

HRLN 29 - Evidence from: UK Environmental Law Association

Senedd Cymru | Welsh Parliament

Pwyllgor Newid Hinsawdd, yr Amgylchedd a Seilwaith | Climate Change, Environment, and Infrastructure Committee

Atal a gwrthdroi colli natur erbyn 2030 | Halting and reversing the loss of nature by 2030

1. Your views on the effectiveness of current policies / funds / statutory duties in halting and reversing the loss of nature by 2030.

(We would be grateful if you could keep your answer to around 500 words).

UKELA does have concerns about the current situation in which there appears to have been significant loss of nature and biodiversity; the Wales-wide situation is likely to reflect the UK position. However, one of the concerns flagged in our response to the Wales White Paper is the lack of effective data, including baseline data, which has been obtained on the current state of nature: www.ukela.org. We are aware of the recent Cabinet Written Statement: Biodiversity Deep Dive (25.7.24) which appeared to start to address the question of robust baseline data in some specific areas. This will be key. UKELA's submission to the consultation on the White Paper of 26 April 2024 raised concerns about the lack of funding to tackle biodiversity loss.

2. Your views on the progress towards implementing the Biodiversity Deep Dive recommendations.

(We would be grateful if you could keep your answer to around 500 words).

UKELA notes the recent Cabinet Statement of 25.7.24 mentioned in answer to the first question. We have not been monitoring the full implementation of the Biodiversity Deep Dive recommendations and so welcome further detailed information on this.

3. Your views on current arrangements for monitoring biodiversity.

(We would be grateful if you could keep your answer to around 500 words).

See UKELA's comments to the first and second questions and in response to the White Paper available at: www.ukela.org.

4. Your views on new approaches needed to halt and reverse the loss of nature by 2030.

(We would be grateful if you could keep your answer to around 500 words).

In its response to the White Paper, UKELA strongly agreed with the proposal for a Nature Recovery Framework. However, a weak baseline is likely to compromise any further work so it is good to have targets. However, it needs to be made clear on how these will be met.

We added there are concerns about the Framework itself. UKELA understood that Natural Resources Wales (NRW) had been unable to secure fully up to date or complete data and monitoring for habitats and species. This concern may have been addressed with the development of DataMap Wales. If not, it is unclear how necessarily robust baselines and targets can be set and so provide the starting point for improvement. Take, for example, climate change. There does not yet appear to be a clear understanding of how nature, habitats and species are currently being impacted by a rapidly changing climate in Wales, or how any predicted changes may affect the present position. For instance, the series of Sites of Special Scientific Interest (SSSI) underpins national and international obligations, as well as being the key component to inform judgements on the status of habitats and species. Under the UK Common Standards for Monitoring, SSSIs should be monitored at least every 6 years. However, many sites have not been assessed within 6 years with some not having been visited for over 10 years.

UKELA does support the notion of extensive data gathering and monitoring. However, NRW and any associated organisations will need substantial additional resources to meet its current monitoring, management, and protection requirements. There will need to be additional further resources for NRW and any associated organisations to undertake the necessary research, data gathering and monitoring and management to achieve the Welsh Government's ambitions on biodiversity. Further, any targets set will need to be SMART targets: Specific, Measurable, Achievable, Realistic, and Time-Bound.

Further comment and information on halting and reversing the loss of nature in Wales: see UKELA's response to the White Paper at www.ukela.org.

5. Do you have any other points you wish to raise within the scope of this inquiry?

(We would be grateful if you could keep your answer to around 500 words).

Not at present. Although we note that the timing of the inquiry call for submissions has been when some UKELA members may have been unavailable for comment. UKELA would be very happy to provide oral evidence to the Committee should this be thought of value to the Committee.