

## **HRLN 33 - Evidence from: Wildlife Trusts Wales**

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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**

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**Ymddiriedolaethau Natur  
Cymru  
Wildlife Trusts  
Wales**

## **Wildlife Trusts Wales response to Climate Change, Environment and Infrastructure Committee Inquiry into Halting and reversing the loss of nature by 2030**

**August 22, 2024**

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

Halting and reversing the loss of nature by 2030 is a critical deadline for addressing the nature crisis in Wales. This date has arisen through agreements made at the [2022 United Nations Biodiversity Conference of the Parties to the UN Convention on Biological Diversity \(COP 15\)](#) which led to the international agreement to maintain and effectively manage at least 30% of land, freshwater and oceans by 2030 and the adoption of the Kunming-Montreal Global Biodiversity Framework. Along with this, there were 22 other targets agreed to reduce biodiversity loss. The Welsh Government (WG), represented by Julia James MS, attended this Conference along with the UK Government. It is vitally important that as we assess how effective to date the WG has been in stopping and reversing the loss of nature by 2030 we do not lose sight of the clear commitments and targets the WG has made to address the nature crisis through the UN Convention on Biological Diversity. This is especially important given the upcoming [COP 16 meeting](#) that will be taking place in Colombia this autumn from October 21 to November 1, 2024, and where countries will be asked to provide evidence on how they are working to achieve the COP 15 targets. [The United Nations Environment Program Executive Director Inger Anderson](#) has emphasized that implementation of this agreement is now key saying that “Success will be measured by our rapid and consistent progress in implementing what we have agreed to.”

What is of concern is that for a number of these targets agreed at COP 15 there has been no clarity on how these targets will be achieved. Although we have welcomed the Biodiversity Deep Dive it has been just a process. There is no clarity on what is needed, where (spatial planning) or how to achieve this. What is more concerning is that the majority of this process has only examined the land and not the freshwater or marine requirements. Also, the other 21 targets have not been examined in particular the need to “reduce by half both excess nutrients and the overall risk posed by pesticides and highly hazardous chemicals.” Local authorities have not received any guidance as to how they may help achieve the target for the reduction in pesticide use by 2030 and yet it is almost 2 years since the COP 15 agreement was signed. Some local authorities are developing their own initiatives to reduce pesticide use but many are not. The same concerns apply to the nutrient targets with no clear plan yet developed by the Welsh Government as to how the 50% reduction in harmful nutrients will be achieved. The developing Sustainable Farming Scheme (SFS), for example, to date has no targets to reduce nutrient runoff

from agricultural activities into the water environment. Also, we have seen repeated calls for the critical Water Pollution (Wales) Regulations to be weakened and even scrapped.

The Environmental Principles, Governance and Biodiversity Bill has yet to be brought before the Senedd. Although the intention is that this will happen before the end of this Senedd in 2026 we have had no clarity on the exact timeframe. The Bill is supposed to contain clear targets for biodiversity and a strengthening of environmental law. Whilst this may help to address the loss of biodiversity there is no guarantee as of yet that it will contain the necessary targets, timeframes for achieving these targets and tougher environmental legislation to make a real difference to the ongoing loss of the natural world across Wales. Wales already has good environmental regulations, but we have never had sufficient monitoring or enforcement to stop further loss to nature. At the moment we continue to have an unsatisfactory arrangement where the Interim Environmental Assessor for Wales continues to fill this gap in governance. However, this role has no powers of investigation and can not take the necessary action on issues raised by the public. The Assessor can only examine the functioning of environmental law and recommend any changes needed to the Welsh Government. This needs to change and the environment sector has repeatedly asked Welsh Government for the introduction of National Minimum Standards (NMS) and for further Civil Sanction powers for Natural Resources Wales (NRW). Wildlife Trusts Wales is very clear that without the introduction of National Minimum Standards there will be no clear regulatory baseline to underpin the Sustainable Farming Scheme from the start. NMS will also apply to all farmers, land managers and landowners regardless of whether they choose to enter the Sustainable Farming Scheme. Such an approach is absolutely critical if the issue of agricultural pollution of our water environment and the continuing impact on wildlife is to be effectively addressed.

A recent report by [Wildlife Trusts Wales](#), RSPB and National Trust assessed the long-term investment needed in nature and climate-friendly farming to address the worsening climate and nature crisis. Independent analysis, commissioned by these NGOs, found that increasing Welsh investment to £594 million per annum is essential in order to fund Welsh farmers to address these twin crises. Funding streams to address the nature crisis need to be joined up across all sectors of Government as currently they are not. A good example is future funding for the SFS. It is clear that the current budget and future budgets to support the SFS will still not be sufficient to achieve all the actions required to address the nature crisis. Therefore, funds from other areas, such as those to address flooding and climate change should be made available by the Welsh Government to farmers for the creation for example of wetlands, either temporary or permanent, on flood plains which will help alleviate flooding as well as creating habitat for wildlife to thrive.

We would like to refer the CCEI Nature Loss Inquiry to the Wales Environment Link (WEL) submission on the lack of funding in Wales to address the nature crisis and the WEL [Pathways to 2030 report](#). This report examines 10 key areas for investment in nature's recovery across Wales. In simple terms, Wales cannot achieve its commitments without the NGO sector yet the relationship between the sector and the WG is not a partnership. The [Well-Being Future Generations \(Wales\) Act 2015](#) sets Five Ways of Working of Long-term, Collaboration, Integrated, Involvement and Prevention which is not possible in a funding culture. What is needed is full recognition of the sector that then enables more efficient and effective delivery through long-term investment.

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

Wildlife Trusts Wales is of the view that fundamentally the Biodiversity Deep Dive approach was through the wrong lens. What we believe was needed was to be clear about what Wales looks like in 2030 and then work backwards and discuss and agree on what actions are required by when to achieve the 30x30 goals. This has not happened. What we are left with is a list of actions and recommendations that are not closely tied to the 2030 timeline with no agreement on how and when these actions need to be delivered and by whom. In some instances, there are no conclusions at all. There was no proper assessment in the initial discussions of what the starting point is and what does or doesn't count in an assessment of the current situation regarding biodiversity.

One of the recommendations of the Biodiversity Deep Dive was concerning protected sites and transforming them so that they are better, bigger and more effectively connected. To date, it is not clear how this will be achieved. Of concern is the cut in funding of the Nature Networks programme which is supposed to improve the condition, connectivity and resilience of protected sites. A budget cut of £3.7 million of funding has occurred which is effectively a 27% cut in this budget. The large funding facility (£250-£1million) within the Nature Networks Fund is at the moment the only funding route available for significant landscape-scale collaborative projects. What was needed was an investment available to SSSI owners to manage their land. What we have is a wider (and still needed) fund that requires community input. This is problematic in term of managing marine protected sites. The recently announced Integrated Natural Resources Scheme (INRS) by the Welsh Government whilst welcomed has of yet got no detail about the level of funding this Scheme will receive and for how long this Scheme will operate. This Scheme is supposedly designed to support farmer-focused partnerships delivering nature-based solutions across a landscape of catchment or on a pan-Wales scale.

Most of the wildlife in Wales is found outside protected areas yet there is no clarity on measures needed and implemented to conserve and recover wildlife in these areas. There has been a discussion on Other Effective Area-Based Conservation Measures (OECMs) and whether or not OECMs are a suitable way to address this issue. What was clear was that this approach was problematic in the Welsh landscape with a large amount of private ownership of land. Time was wasted on Designated Landscapes as these are mainly privately owned and they cannot count towards the 30x30 COP 15 target.

The Sustainable Farming Scheme is supposed to be designed to ensure farmers are rewarded for appropriate management of protected sites and for actions that improve the prospects of nature in the wider landscape and freshwater habitats. It is welcomed that the Welsh Government recently announced that the management of SSSIs will be included in the universal baseline payment for the SFS. However, it is far from certain, at the moment, how effective the Scheme will be to protect and restore nature across the wider farmed landscape. Discussions are ongoing between Welsh Government and stakeholders but there is a strong lobby for the weakening of environmental ambition and targets currently proposed within the Scheme. In addition, there is still no clarity from Welsh Government about the level of payments that farmers will receive when they join the Scheme. On top of this, the overall level of funding for the Scheme is uncertain but what is clear is that it will not be sufficient. This is of vital importance if there is to be enough funding available to ensure effective actions in the Optional and Collaborative layers for biodiversity are undertaken.

### **3.Your views on current arrangements for monitoring biodiversity.**

There is without doubt a significant issue around the lack of data due to inadequate monitoring, particularly in the marine environment. This needs to be urgently addressed. For example, there has been an assumption that Marine Protected Areas (MPAs) in Wales will form part of the 30x30 target. The problem is that MPAs have been established to protect designated features, not the whole site. A lack of data on the extent or condition of these features means that it currently is not possible to assess if many MPAs will be able to contribute to the 30x30 target. From data available at present only 3% of MPAs have all their features in good conservation status.

The lack of adequate biodiversity data for the marine environment also applies to the freshwater environment. The high level of public concern over river pollution demands adequate action on biodiversity monitoring of this environment in order to ensure that measures undertaken to address river pollution are effective in protecting and restoring biodiversity.

What is clear is that science-based decisions are critical and there is a lack of funding for our universities to provide this. Their role is critical in not just understanding environmental trends but also in the testing of recovery methods. This lack of capacity stifles the ability of the NGO sector to work in partnership.

Citizen science as part of the Team Wales approach can undoubtedly help plug gaps in our knowledge about the current state of nature in Wales. In order for this to be enabled the Welsh Government needs to recognize the significant benefits of citizen science and if necessary, assist with providing funding for this approach when required.

NGOs often have considerable expertise in this area and are willing to assist as and when needed. They can also provide advice and training for land managers and farmers who want to increase their skills in biodiversity monitoring. Welsh Government needs to ensure that NGOs are brought into the discussions about providing advice to land managers and farmers, as part of the SFS, and that funding is available to allow NGOs to participate in training when required.

WTW also has concerns about the lack of effective communication about the outcome of the Biodiversity Deep Dive and what the next steps are following the recommendations that came out of this process.

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

#### **Green Finance**

At the moment there is currently no clear costed plan by WG for nature's recovery. This is sorely needed in order for the scale of the investment needed to be properly assessed and a strategy developed to ensure this investment can be achieved. One approach is through High Integrity Green Finance. To date Welsh Government has not enabled Green Finance in order to secure additional funds to achieve more positive outcomes for biodiversity.

The Wildlife Trusts secured a £38 million donation from Aviva in 2023 to restore Britain's lost temperate rainforests. Working with the Wildlife Trusts has ensured Aviva can achieve significant carbon sequestration now through restoring this endangered rainforest to offset their Scope 3 emissions expected by 2050. The Wildlife Trusts believes the Welsh Government needs to significantly upskill itself and engage with the Wales Development Bank in opening up investment markets in Wales. Working with NGOs will ensure high-integrity projects that produce permanent results for nature and climate and critically involve local communities. The opportunities are considerable yet we have only seen political delays.

### **Reduced use of Pesticides**

Continued use of pesticides is of particular concern. In stark terms, no insects mean no wildlife. Wales is in a unique position to reduce pesticide use as it can influence public bodies and a campaign to raise awareness domestically could see significant reductions in line with COP 15 commitments.

### **Renewables in the right place**

The scale and pace of offshore renewables are of particular concern. This will cause further loss of marine wildlife and will impact MPAs if there is not clarity on where offshore renewables are located without significantly impacting on wildlife. In addition, there is a lack of discussion on cabling and maintenance impacts. We continue to see calls for a Severn Barrage that would severely impact this ecosystem with significant impacts on wildlife. We are increasingly concerned about onshore wind with proposals on important habitats such as peatlands being proposed. Renewable energy is urgently needed to help address the climate crisis, but this should not be at the expense of biodiversity and threatened wildlife. Wales can be a world leader in renewables if it enables a community energy production model and takes steps to address the sometimes negative impacts of renewable energy projects on biodiversity.

### **Species reintroduction targets**

The Welsh Government has no policy on species reintroductions. This needs to be urgently developed. Species reintroductions, particularly those of keystone species and ecosystem engineers, such as beavers, are known to have significant biodiversity benefits and are being developed by many countries. Wales is behind the curve on this discussion. Wildlife Trusts Wales is currently supporting both beaver and white-tailed eagle reintroduction projects. The beaver project has suffered however from a lack of leadership and commitment from both Natural Resources Wales and the Welsh Government. This needs to change. The UK Government has set up a Species Reintroduction Taskforce which is an independent technical advisory group. This Taskforce brings together experts from a range of disciplines to provide evidence-led advice and guidance on existing and potential species reintroductions in England. A similar Task Force is urgently needed in Wales. Marine species such as native oysters and horse mussels need to be reintroduced at scale along with a whole Wales ambition to restore marine habitats such as salt marsh, seagrass and mudflats. To this point, although some marine habitats have been recognized by Welsh Government not all are. What the science tells us is that a mosaic of marine habitats needs to be restored together.

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

### **Global Responsibility**

Under the Well-being of Future Generations (Wales) Act 2015 Wales has a requirement to be globally responsible. Actions in Wales should result in negative impacts on biodiversity overseas. For example, imported products such as palm oil and soya, often used as animal feed, are well known to be linked to ongoing deforestation in tropical countries in areas such as the Amazon rainforest. As biodiversity targets are developed through the Environmental Governance Bill it will be crucial that these targets help reduce the negative impacts on biodiversity hot spots in other parts of the world and not exacerbate them.

### **Wales Environment Link (WEL) Report on Pathways to Recovery**

In March 2023, WEL released a report [“Pathways to 2030: 10 Key Areas for Investment in Nature’s Recovery in Wales”](#). This report outlined 10 key areas recommended for action by the Welsh Government to help achieve the 2030 targets agreed at COP 15. This report sets out actions that require stopping activities damaging biodiversity, reducing negative impacts on nature and commencing positive actions to protect and restore nature. Wildlife Trusts Wales recommends the CCEI have a close look at this report which covers a range of habitats where action is proposed including farmland, coasts, seas, peatland, grassland, woodland, rivers wetlands and species.

### **Transition to more sustainable farming methods**

Wildlife Trusts Wales is concerned that the nature and climate actions so urgently needed within the Sustainable Farming Scheme will be weakened due to the significant criticism that this Scheme has received from the farming lobby. This criticism has been partly based on a campaign of mis-information. Farming in Wales has to change if we are to meet our Nat Zero and Nature targets. However the reality is that farmers are being offered very little assistance in transitioning to more sustainable farming methods. A reduction in livestock numbers will be needed in order to address the climate and nature crisis and therefore farms will need to diversify. Part of this should be the re-introduction of mixed farming including organic horticulture. This in turn will provide healthy, sustainable food for the citizens of Wales.

**ENDS**