HRLN 35 - Evidence from: Plant Life

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).

The decline in 42% of flowering plant species and 44% of bryophytes in Wales since the 1970s demonstrates the need for immediate action. Although, 29.4% of Wales is designated as protected area, only 10.6% of Wales's land are dedicated to nature conservation.

We support legislation and policy to halt and reverse the loss of nature by 2030, as set out in the White Paper on environmental principles, governance and biodiversity targets. But it lacks the necessary enforcement mechanisms and funding for effective results, like policies with long-term vision for regular monitoring, management and financing.

In addition to 30x30, the Global Biodiversity Framework (GBF) includes goals to: 'Reduce risk from pesticides by at least 50% by 2030; Reduce nutrients lost to the environment by at least 50% by 2030; Reduce pollution risks and negative impacts of pollution from all sources by 2030 to levels that are not harmful to biodiversity and ecosystem functions.' These are not mentioned in the White Paper but should be considered in developing the broader suite of targets.

We welcomed the additional protections afforded to species-rich grassland, as part of in the irreplaceable habitats list. Welsh semi-natural grasslands have declined more than 90% since the 20th century, primarily due to intensive farming and land use. Restoring all remaining semi-natural grasslands is essential for achieving biodiversity targets.

Additional protections for irreplaceable habitats and other protected areas are ineffective, with only 20% of Wales protected site's features in favourable condition and nearly half in unknown condition. Existing strategy for protected

areas needs to be significantly improved, and their management and monitoring plans needs to be properly applied. Natural Resources Wales (NRW) need more funding and resources dedicated to implementing these suggestions. The current under-resourced state will worsen as more responsibilities come into effect, like SFS, and shared resources, like specialist ecologist, are stretched further. It is essential to secure new funding rather than reallocating existing funds away from other under-resourced responsibilities.

Protected sites face pressures outside their boundaries, such as nutrient enrichment from atmospheric nitrogen deposition, as well as internally. These external challenges must also be addressed in their monitoring and management to ensure ecosystems remain healthy and functional.

We strongly support the large-scale restoration of priority habitats, like the ambitious National Peatland Action Programme. The success of the programme has enabled it to surpass its initial restoration targets, with new targets and budgets to triple restoration activity by 2031. Support in law and policy, like Low Carbon Wales strategy, has contributed to its success. Broader cross-cutting goals, such as upscaling to national coordination and national monitoring, has further driven Wales's ability to deliver peatland restoration where most needed.

We want to see a similar strategic approach to semi-natural grasslands, for example through a National Grassland Action Programme. Plantlife are already working with NRW to begin the process of establishing what such a programme could look like and have jointly organised a workshop with other environmental stakeholders in Wales to scope next steps.

Air pollution is one of the primary causes of wildlife loss and environmental degradation in Wales, from intensive farming practices and fossil fuels. The persistently high levels of atmospheric nitrogen have meant 99% of sensitive wildlife habitat is suffering and is consistently above the critical threshold for bryophytes and lichens across 60% of Wales. Ammonia emissions in Wales increased between 2005 and 2021, caused from agriculture. Urgent action is needed to reduce agricultural emissions through stronger regulation and better advice and support to farmers as part of an integrated approach...(SEE Q14

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).

We support the Biodiversity Deep Dive (BDD) recommendations which offer valuable guidance for many of Wales's biodiversity objectives. To effectively implement these recommendations, the Welsh government should not only incorporate them across governance of relevant work, but also create policy and legislation that specifically supports BDD recommendations.

Many BDD recommendations require expert advice from ecologists, biodiversity officers or local environmental experts- for example the proposal "Investing in sustainable land management pilots to build knowledge and experience in delivery for species and habitats". Pilot projects often uncover valuable insights and new directions, and ecological advisors are key to identifying issues and suggesting improvements.

Incorporating input from ecological advisors not only for environmental government departments or building and planning, but across the Welsh government would ensure that Wales's nature is considered in Welsh policy and legislation across all sectors. To achieve this, the Welsh government should allocate sufficient resources for ecological advisors to provide input at a national level.

At the local level for planning and environmental enforcement, the value of expert advice is under appreciated and under-resourced; for example, biodiversity officers in local authorities are often secretariat for partnerships. Funds they do receive (such as via Local Places for Nature) already have associated priorities that prevent Biodiversity Officers and other local staff from implementing their own local priorities – especially for biodiversity rather than communities. BDD relies on local action plans to be well informed but doesn't empower local authorities to improve their nature plans and their delivery, like providing more professional input or less restricted funding opportunities.

The BDD has a predominantly land-use focus on agricultural land or management of designated landscapes. This perspective is extremely useful for land managers, but lacks the more ecological objectives, like species recovery. There is no mention of priority habitats like restoring temperate rainforests, protecting species-rich grasslands or grasslands with fungi interest. Instead, it

relies on local action plans and management to include them. Without the guidance and encouragement to approach priority habitats in this way, under-resourced local authorities may lack the expertise and capacity to create well-rounded local biodiversity plans

(Please feel free to contact for references or website links mentioned in any question)

3. Your views on current arrangements for monitoring biodiversity.

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

We are disappointed in the current monitoring of biodiversity, especially for important and protected areas of biodiversity. In NRW's 2020 Protected sites baseline assessment, the condition of nearly half of protected sites are still unknown, while only 20% are considered to be in favourable condition. The significant time lapse since the last 2003 large-scale survey and the huge number of unmonitored sites mean many protected areas could be under serious, unrecognised environmental deterioration.

The current health and state of most Welsh grasslands is essentially unknown. Apart from protected sites network and SSSIs, we have to rely on the original Terrestrial phase I survey based on decades-old surveys for grassland habitat information. This data is based on surveys from 1979 to 1997, with its method review over a decade ago (2010). Meanwhile, recent reports of Wales's wider environment describe nature's accelerating deterioration, like the 42% decrease of flowering plant species distribution across Wales. These reports highlight the significant disparity between the true current state of grasslands and the out-dated available data.

The lack of monitoring means that, although species-rich grasslands now have additional protections as part of the priority habitat list, it does not guarantee their conditions will improve. With the current state of many grasslands unknown, the effectiveness of their new additional protections, and new management plans, will not accurately measure their effectiveness or success in terms of improving their ecological condition.

Protected sites must all be regularly monitored at appropriate intervals as part of a programme of active management and investment. We note that it is very important to have discussions about monitoring that take place at the same time as the creation of the targets – deciding on monitoring approaches too late could lead to poorer quality monitoring, and even perverse outcomes.

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).

We strongly recommend that the Welsh Government commits to developing a government-led, policy-driven strategy for semi-natural grasslands to realise BDD recommendations like transform protected sites; unlock potential of grasslands within designated landscapes; reform planning to protect species-rich grasslands; incentivise nature restoration as part of development; unlock public & private finance to deliver for nature, ensure future farm support fully addresses grassland restoration, and make the most of managing road verges and grassland greenspace for biodiversity. Welsh Government-funded 'Nature Isn't Neat' project exemplifies how managing road verges for biodiversity can contribute towards nature recovery aims.

According to UK studies, climate change impacts arable land, calcareous grasslands, and urban areas most severely; causing more habitat loss, land use change and reduce species redistribution ability. Currently, semi-natural grasslands are estimated to occupy only 9% of Wales's land while agriculturally 'improved' grasslands extend over half of the land area.

These semi-natural grasslands offer a wealth of benefits for people, nature and climate.

Biodiversity - Supporting upto 40 species per square meter, they can store more soil carbon per hectare than 'improved' grassland, with links between carbon sequestration and species-rich plant communities and fungi.

Carbon sequestration- Grasslands in Great Britain are estimated to store around two billion tons of carbon, with potential to store more through restoration.

Nature-based solution and farming- Semi-natural grasslands also provide a range of other ecosystem services, from flooding mitigation to productive farmland.

A grassland strategy restoring and expanding semi-natural grassland would enhance the ecosystem service multifunctionality; support farming livelihoods; improve the wider landscapes health and resilience through connectivity; contribute to the global 30x30 targets.

We strongly agree BDD's recommendation to use designated landscapes, like National Parks and National landscapes which cover nearly 25% of Wales, to better drive nature recovery and enhance grassland restoration.

As mentioned in White Paper Bill responses and BDD, biodiversity action should be embedded across governments responsibilities (transport, planning, circular economy, etc.) For transparency and accountability, these roles and responsibilities need to be clearly defined and monitored.

Planning and nature recovery policies must work together to strengthen the health and resilience of the local environment, through stronger protection and investment in nature recovery with any planning proposals. To ensure such protections are effective, the monitoring and enforcement for these policies also need to be detailed.

There is insufficient consideration of the interface between biodiversity targets and farming, when the two are inextricably linked and there's growing concern that vital actions initially proposed for SFS are at risk of being significantly diluted. Encouraging nature friendly farming practices through SFS could be the biggest tool to deliver on biodiversity in Wales and needs to remain ambitious and impactful. For example, many wildlife species depend on grazed meadows and other semi-natural grassland habitats and so are inherently dependant on farmed and productive land.

As Wales commits to moving towards a more circular economy, investing in system changes in green infrastructure management would significantly contribute toward a more bio-based energy source.

Wildflower verges require less frequent mowing during the year, lowering the carbon footprint and cost of road infrastructure maintenance and construction without fertile topsoil. Most grassland species prefer low fertility soil, so removing grass cuttings creates beneficial conditions for diverse plant communities and their pollinators. The costs can pay back on capital investment in cut-and-colle...(SEE Q14

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).

(CONT. Q10)... to nutrient management. In particular, intensive cattle units must be regulated through the environmental permitting system and permitting thresholds lowered for poultry units.

As the impacts of climate change increase in severity, there must be increased resources and funding put towards nature recovery and climate change mitigation and adaptation, to account for increasing extreme weather, flooding, temperature rises and other unexpected pressures.

We welcome the Welsh government's commitment to creating a Welsh environmental governance body. It's funding must be seen alongside the wider investment needed to deliver targets, with a guarantee that the funding of the body will not detract resources from delivery on nature recovery.

The current deficit of resources, like staff cuts in NRW, need to be corrected so government bodies have the resources to fulfil the new watchdog's advice. The proposed staff team of only 12 staff is also a concern, considering the substantial task at hand.

Giving the body power to monitor and investigate the effectiveness of the law, like Scotland's body, is a better measure for nature recovery and could be more effective than only investigating implementation and non-compliance.

Powers to levy fines would give stronger compliance incentive, but this has not been given to the governance body. This power could contribute to the environmental finance, with any funds raised would be reinvesting in positive environmental outcomes in Wales.

(CONT Q13)..cut-and-collect machinery within viable timeframes. Evidence for this comes from Dorset Council in England which reduced its verge management budget by 45% over 6 years. Furthermore, revenue streams can offset costs by utilising the biomass from vegetation maintenance. Technologies can transform waste grass cuttings into a huge range of sustainable resources, from bioenergy to bio-based road surfacing materials. Plantlife have been involved in small-scale government-funded trials in England testing these new technologies. We recommend that the Welsh Government creates a Taskforce to investigate the

opportunities that could be delivered through a system-level change to managing road verges for biodiversity, as part of a bio-based circular economy. The Taskforce could investigate the feasibility of scaling up trials, and unlock potential barriers, such as service contracts management, inflexible waste regulations and business planning to generate viable returns on capital investment. These measures could improve existing green infrastructure projects, like the Gwent Green Grid partnership, and act as a pilot for many others.

Species diversity is the key measure of a healthy environment. Species recovery plans need to be incorporated and financially-supported in national nature recovery, with a balanced focus for both habitat and species recovery projects. The Natur Am Byth project focuses on grassland, with NRW closely involved, but is only a fixed-term project. As a species-focused project, the current conservation framework has required them to adjust and work around it, rather than support. The conservation structure should be adjusted to create a more balanced approach that equally prioritises species and habitat through longer-term support, improving resources for new and existing species projects, like NAW.

APOLOGIES FOR THE OVERFLOW OF PREVIOUS QUESTION INTO Q14.