HRLN 40 - Evidence from: Welsh Fisherman's 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**

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Climate Change, Environment, and Infrastructure Committee.

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Dear Committee,

Halting & Reversing the Loss of Nature by 2030 : Invitation to Contribute to the Committee's Consultation.

With our thanks to you and the Committee for your kind invitation for the Welsh Fishermen's Association-Cymdeithas Pysgotwyr Cymru (WFA-CPC) to contribute to the above titled consultation/committee inquiry:

Unfortunately, we are not best placed to answer the questions of interest to the inquiry as we are not directly involved in this particular policy development area.

We understand from a distance that the Welsh Government has committed to the COP15 targets and the embedding of the nature and climate change emergencies within the current programme for government, however, with nothing more than a vague recollection of a marine biodiversity expert group discussion and a long running but equally vague memory of the preliminary work undertaken by the Welsh Marine Conservation Zone (MCZ) Task & Finish Group, led by the JNCC and NRW gap analysis/assessment of the contribution of Welsh MPA's towards an ecologically coherent MPA network in 2016, otherwise we remain outliers in the broader landscape of policy expert groups that generally drive the developing narrative under the high level government commitments/objectives, which as in this case results in significant marine stakeholder interests being late to the arrival of good intentioned but potentially far reaching consequences/implications from policies that unnecessarily conflate a loss of nature and biodiversity across land and marine in Wales suggesting that both natural environments are in an equally degraded state. This is not the case within the Welsh marine environment, we completely agree that the marine environment and its biodiversity is increasingly at risk from terrestrial sources of pollution, chemical, pharmaceutical, sewage, run-off, litter, climate driven change and INNS for example that, despite regulations, continue to escalate. If these known and long standing sources of terrestrial contamination cannot be effectively controlled through existing legislation (most of which until recently was subject to environmental governance and scrutiny) in a targeted way it would in our opinion be reasonable to ask how any government expects new laws or protections to; 'Halt & Reverse the Loss of Nature by 2030'; given that existing protections have been in force for decades and that any new legislation/bill will not likely complete its passage through the Senedd until 2026 leaving 4 years remaining to comply by 2030, which will, (assuming it can be afforded) consume the proposed new environmental governance body with a whole new level of regulatory compliance issues to address without having effectively resolved existing non-compliance.

Furthermore, if the intention of the legislation is to halt and reverse the loss of nature by 2030 we must first have a very clear and unambiguous understanding of what that means, and what evidence exists that points to the species or habitat marine and terrestrial that are most at risk and why.

If we consider the statutory reporting requirements under the former EU Habitats Directive – Article 17; six yearly reporting was a legal obligation to each member state to report on the progress toward the conservation status of European Natura 2000 designations in accordance with the conservation objectives. However, we would argue that the reporting process is flawed and therefore not a reliable baseline to support the current conservation status of marine SAC's in Wales. In simple terms, the monitoring of designated sites is a statutory requirement therefore it would be reasonable to accept the favourable or unfavourable conservation status of a site or feature is based on the assumption that adequate monitoring takes place throughout the six yearly reporting period - But this is not the case.

The implications of choosing not to monitor on an ongoing basis are important to understand at the reporting stage. If monitoring has not taken place authorities can only record, unknown. If more than one unknown is reported, even if other site components are favourable the reporting process will trigger an unfavourable conservation status as a default conclusion, thereby presenting a perpetual negative outcome rather than measuring actual progress against conservation objectives, particularly in the Welsh marine area. We understand that data and evidence are expensive to collect and maintain but they are nonetheless statutory and for these reasons we cannot agree with the more emotive terms: loss of nature/biodiversity decline used to describe the marine environment as they do not reflect the reality that fishermen and women see in their everyday working lives throughout Wales.

Against this background, it would appear to be a waste of resources to create a new environmental governance body in Wales with all the associated costs, given that the EU equivalent has evidently also failed to improve nature and prevent biodiversity loss and presumably continues to do so as the EU is also a signatory to the COP15 targets inter alia.

The inconvenient truth is that in Wales's marine area we have significant areas that are designated for different purposes, it would appear that site extent/area were not adequately considered at the time of designation which we suspect in today's economic climate means the cost of monitoring statutory or otherwise is not feasible or affordable given the considerable size and scale of designated sites within the Welsh Zone.

It is also true that if sufficient scientific evidence of feature presence did not exist prior to the expansion/moderation process of SAC's in Wales, as required under the SAC site designation procedures, there would be no feature to assess or monitoring required. Unless or until such uncertainties are appropriately addressed we cannot with any confidence support the broader ambitions of the proposed Bill and the intention, however well meaning, of placing biodiversity targets into Welsh law.

We understand that the challenges of climate driven change and biodiversity loss are interlinked, however, given that no government has the levers to control the influences of climate change directly we fail to understand why would or should such targets be included in the proposed Bill (Wales) and if they are what could realistically be the expected outcome of doing so.

In our considered opinion the risks of unintended consequences are increased further when cross cutting policies are developed in isolation. The Welsh marine area is a prime example whereby strategies exist for energy and conservation that have little regard for fishing activities as no strategy exists for reference/guidance.

Spatial squeeze, is the combination of areas identified for floating offshore wind developments, associated cable routes, interconnectors and landfall sites, together with increasing Marine Protected Areas within and outwith the Welsh zone. The increasing competition for development in the marine space will inevitably result in displaced activity into the Welsh zone within which currently the Welsh National Marine Plan is not equipped to assess impacts or implications, that being the case the controls necessary to manage displacement do not exist. Similarly, the environmental impacts of floating offshore wind (FOW) and the associated infrastructure are not clearly understood, the Environmental Impact Assessments (EIA) only consider impacts to protected species, the process does not interrogate the known effects of heavy metals introduced into food webs and environment from sacrificial anodes used to reduce the corrosion of renewable energy devices for the duration of the life expectancy of offshore wind farm developments. Neither are the known implications of electro magnetic frequencies (EMF) emitted through array cabling and corridors, particularly mid water umbilical cabling necessary for FOW arrays understood sufficiently enough to ensure no lasting or damaging effects are introduced and accumulated by multiple site/array/cable offshore developments.

These facts are important to note as in the pursuit to generate more cleaner energy from the marine area there are as yet unanswered questions regarding the in-combination effects and implications to the marine environment that would in our view, without a definitive answer, potentially exacerbate and undermine the health of marine species and habitats in Wales and potentially the physical health and wellbeing of the public, all of which we would argue add to rather than reverse negative impacts on nature.

WFA-CPC
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