

HRLN 31 - Evidence from: Natural Resources Wales

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**

Written Evidence: 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.

Nature must be integral to all decision making. Halting and reversing nature loss is already set out in the Welsh legal framework including the Wellbeing of Future Generations Act (WbFG Act), the Environment (Wales) Act (EWA) and the Planning (Wales) Act. Wales' Natural Resources Policy and Nature Recovery Action Plan, Future Wales, Planning Policy Wales and the Welsh National Marine Plan also have aims, objectives and policies that support biodiversity and resilience of ecosystems. However, the [State of Natural Resources Report \(SoNaRR\) 2020](#) and the [State of Nature Report 2023](#), both clearly show biodiversity loss is continuing. To move Wales into nature recovery, we must be bold and proactive in the implementation of existing legislation and policy.

The Environment (Wales) Act, in putting the UN Ecosystems Approach into law, provides a framework to help co-ordinate both policy and delivery. The Act introduced a 5 yearly sustainability assessment for Wales, a policy response which applies across the Welsh Cabinet and implementation plans; namely SoNaRR, the NRP & Area Statements. There is much unused potential in the powers and duties under the Act. SoNaRR has the potential to engage civil society in the run up to a Welsh general election, as well as to feed information into the Town & Country Planning system. The Natural Resources Policy can set out a refreshed environment policy which will apply across the Welsh Cabinet. Area Statements can co-ordinate the public sector to help deliver the NRP, using section 11 and 12 powers as well as feeding into the Planning system.

The Wildlife and Countryside Act and Conservation of Habitats and Species Regulations (2017) are primary pieces of legislation for protecting both habitats and species. These can be effective in helping to protect priority habitats and species, particularly when supported by the spatial planning system and respective enforcement. The Planning Act provides a useful foundation to incorporate ecosystem resilience into the planning system, however the effectiveness of the current net biodiversity benefit approach is still in its infancy and its impact is unclear.

More recent statutory mechanisms and tools are proving helpful in embedding nature more widely into decision-making in Wales, although resources to support implementation are challenging. Under Section 6 of the EWA public authorities – including NRW - are required to consider nature through their functions. As a result of the WBfG Act, foundational discussions are underway between Public Service Body partners about mainstreaming biodiversity, with nature and climate now featuring highly in most recent PSB Wellbeing Plans. However, public bodies alone are not able to address the causes of loss of nature. Other mechanisms, such as Area Statements, can have an important role in supporting

wider partnership working in place, for example in developing resilient ecological networks throughout Wales.

The Global Biodiversity Framework (GBF) is being transposed into Welsh policy and legislation to deliver Wales' commitments and actions as part of the UK's new National Biodiversity Strategy and Action Plan (UK NBSAP). In Wales we take collaborative approaches such as through the Ministerial Biodiversity Deep Dive Recommendations, putting protected sites at the centre of resilient ecosystems and adjusting our ways of working. Accordingly, and reflecting the existing and future policy and legislative direction, nature restoration is at the heart of the NRW [corporate plan](#) to ensure nature and society thrive together based on a shared commitment of sustainable use that also provides for essential needs, such as food, water and energy.

In our unique role as Wales' statutory nature conservation body (SNCB) we know access to relevant evidence and expertise is critical to support robust decision making, including financial decisions, to deliver throughout our many functions and that often, data and information becomes outdated, incomplete or is rendered poor quality. Being financially flexible allows us to target evidence bases required for live projects and programmes and we seek collaborative opportunities with others within and outside Wales to enable innovative and joined-up evidence and funding to inform better decision making.

From a regulatory perspective, the wide spectrum of tools available, applied according to the Regulators Code and our Regulatory Principles, is reported in our annual regulatory report ([Natural Resources Wales / Annual Regulation Report 2022](#)). Where enforcement action results in fines, we advocate those funds are reinvested in nature recovery activities.

The scale of the nature emergency and addressing the challenges around halting biodiversity loss and securing recovery will also necessitate transformational changes. This includes generating increased financial resources, securing governance that incorporates nature into institutional decision-making, using scientific advancements and robust repeatable data and evidence streams, and public education and engagement to support societal and behavioural changes needed to address the nature emergency. Collaboration between governments, public authorities, institutions, NGOs, businesses, and individuals to achieve this is essential.

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

The Biodiversity Deep Dive Recommendations and actions are a mixture of new actions to be taken immediately, expansion and acceleration of existing schemes, and longer-term actions that deliver throughout the Senedd term and beyond. These ambitious and

integrated actions are required to put nature on the path to recovery; delivering the actions requires a collective response, momentum, resources and long-term commitment by all.

NRW was heavily engaged in the development of the Recommendations and is a key organisation in their delivery. As they move into implementation we continue to input to the Biodiversity Deep Dive Core Group with Ceri Davies, Executive Director of Evidence, Policy and Permitting chairing the Monitoring and Evidence Expert Group. Our specialists are engaged in the Other Effective Area-based Conservation Measures (OECMs) and Nature Recovery Exemplar Areas (NREAs) Expert Group, Designated Landscapes Expert Group, and the Coast and Seas Partnership Cymru (CaSP). Through our engagement in these groups we have been driving activities at pace with initial findings, reports and next steps prepared. The shift into implementation has seen tangible progress being made on a number of immediate actions. We contribute progress updates to the bi-annual report (May 2023) and the recent Ministerial written statement (July 2024).

In terms of specific recommendation delivery NRW has for example, delivered a Nature Networks map, publishing terrestrial and marine Priority Ecological Networks (PENs). This evidence is supporting prioritisation of on the ground action for ecosystem resilience and we will continue to refine these maps to support further targeted action both by ourselves and partners. Alongside this we are working closely with Welsh Government on its Nature Networks Programme (NNP), which continues to expand to improve the condition and connectivity of protected sites both through direct action within NRW and through a wider NLHF administered grant programme. We are scoping the review of the sites of special scientific interest (SSSI) series to inform an accelerated notification programme and the National Peatland Action Programme (NPAP) delivery capacity is being increased to a target of 45,000 ha of peatland restored by 2050. NRW has produced refreshed guidance for designated landscape authorities on the production of their management plans which now strengthens advice for embedding nature recovery action at a landscape scale. Although further progress is dependent on continued efforts and collaboration to achieve the 30 by 30 target, which is reliant on the ability of partners to contribute, in the absence of and dedicated resources such as core funding.

However, the delivery of the Biodiversity Deep Dive recommendations is not, and should not, be presumed to be, solely for Welsh Government and NRW to deliver alone. A collaborative Team Wales approach working at pace is critical to achieving the scale and ambition needed to support meaningful delivery of 30 by 30 target. CaSP Cymru is driving forwards a number enabling / transformative areas of work to support positive outcomes for our seas in line with the Deep Dive recommendations, and around which there is now a significant body of collaborative work and delivery established. An Ocean Literacy Strategy for Wales is intended for publication later in 2024 with partners collaborating around a funding proposal to deliver the actions identified. Concurrently partners are working with WCVA to establish Marine Fund Cymru, bringing together private funding to deliver activities supporting nature recovery at sea. In these positive examples, both NRW and WG are involved in a wider partnership seeking to explore and drive forwards action collectively. We suggest that an action plan for the whole Deep Dive is needed that enables Team Wales to collectively deliver the recommendations to ensure clear ownership and expected timeframes for actions, thus ensuring greater accountability and transparency.

The expert Deep Dive groups that are working on the OECM framework, designated landscapes and monitoring have highlighted the challenges and reliance on ‘good will’ from group members rather than having any dedicated or additional resource to help drive delivery impact and implementation. The absence of capacity from partners is a limiting factor for further develop the Deep Dive recommendations. This has placed additional pressure on NRW in order to enable progress to be made through the work of these groups.

3. Your views on current arrangements for monitoring biodiversity.

Biodiversity monitoring in Wales includes a range of important activities. SoNaRR uses what available data there are from multiple monitoring programmes and draws on assessments such as the State of Nature Report and the [Global Assessment Report on Biodiversity and Ecosystem Services](#). SoNaRR 2020 said *we need more data to track biodiversity change, determining the effectiveness of biodiversity policy, delivering strategic outcomes, and providing alerts of changes to the environment. Technical advances like eDNA, opportunity mapping, and earth observation could assist in this delivery, but this must not displace invaluable on-the-ground expertise and observation.*

Realistically we do not have the capacity to address all identified evidence gaps. Although recognise this would be desirable we address evidence gaps through highly targeted risk based prioritised use of our resources to focus evidence generation where we need it most. Such a risk-based approach helps mitigate the risks around evidence gaps and helps maximise both impact and our understanding of key strategic pressures on our environment. For example we use risk assessment tools to identify when and where water monitoring should take place as part of our annual programme planning.

The specific evidence implications for supporting 30 by 30 are continuing to crystallise. NRW is actively involved with the Deep Dive process and the supporting expert groups to identify the emerging evidence needs and how they could be addressed in cost-effective ways. We are committed to the continuation of the monitoring and evidence sub-group of the Biodiversity Deep Dive to develop approaches to generating the required evidence and understand the cost implications for a range of options.

Lessons learnt from the Deep Dive highlight challenges including the absence of existing resources to monitor protected sites (55% unknown status) which cover ~11% of Wales. Expanding monitoring to cover at least 30% of land and sea presents a substantial challenge in the face of resource constraints, data management, standardisation, prioritisation of monitoring and capacity building. Overcoming these obstacles requires a concerted effort to invest in monitoring infrastructure, develop standardised methods, and build capacity at all levels.

Monitoring statutory protected sites (SSSIs, SACs, SPAs etc) follows the inter-agency Common Standards Monitoring model. This risk-based approach focusses on habitats and

species for which sites were designated. It was designed to provide cost-effective feedback for management and policy aimed at maintaining or improving the condition of designated features.

Our protected site condition [desk-based evaluation](#) in 2020 across the terrestrial and freshwater environments showed 15% of features as favourable, 29% unfavourable, and 55% unknown, highlighting significant gaps in knowledge. In a similar 2018 marine assessment, indicative condition assessments for the 128 features of marine SACs and SPAs showed 46% of marine features were in favourable condition, 45% in unfavourable condition, and 9% unknown.

Resourcing protected sites monitoring, data collation, analyses, and assessment to inform evidence-based decision making continues to be a significant long-term challenge because of historic and current funding limitations. In response, our terrestrial protected sites monitoring strategy reflects a highly targeted approach to monitoring to support place-based evidence needs but is an approach that increasingly struggles to maintain certainty about understanding the health of sites at the national scale. Similar approaches in the marine environment are supplemented by high value long-term datasets, tracking biodiversity change through time e.g. Skomer MCZ monitoring.

Structured species monitoring programmes are primarily conducted by citizen science volunteers, often coordinated at a UK level (e.g. Wetland Bird Survey, UK Butterfly Monitoring Scheme) with trend data at UK or Welsh levels depending on data quality. Similarly, the Conservation of Habitats and Species Regulations requires governmental and statutory body reporting on a six-year cycle for species and habitats identified within the regulations.

Strategic projects such as the Nature Networks programme, National Peatland Action Programme, LifeQuake, Sands of Life and ProjectSIARC also include monitoring to support targeted restoration actions. Recent projects have positively impacted approximately 250 sites, including peatlands, rivers, marine areas, sand dunes, and grasslands.

Wider environmental monitoring programmes such as the Environment and Rural Affairs Monitoring and Modelling Programme (ERAMMP) and Water Environment Regulations (WFD) monitoring include biodiversity components. More specifically, the WFD compliance monitoring includes: macrophytes, aquatic macroinvertebrates, and fish for rivers and lakes; benthic invertebrates, seagrass, and fish (in transitional waters) for transitional and coastal waters; and freshwater fish stocks (particularly salmon and trout). The WFD compliance monitoring records other water quality indicators including chemical data (e.g. ammonia, phosphate) to help assess the state of those ecosystems.

Outside of these structured monitoring approaches, local monitoring by various organisations (e.g. NGOs, local authorities or academia) focuses on specific biodiversity interests, and ad-hoc species observations across Wales often collated through Local Environmental Records Centres and other mechanisms can provide supplementary evidence on biodiversity changes.

Recognising and addressing knowledge gaps to inform where the most effort is required to tackle the joint nature and climate emergencies is essential.

The effective sharing of monitoring data is a key aspect of collaboration. Related to this, we are also aware that significant survey and monitoring data is held privately by developers and considered commercially confidential; finding ways to share this data, e.g. via permit conditions, could provide additional valuable evidence. We recognise more investment is needed in relation to data sharing with continual development of services such as Datamap Wales and ongoing discussions with partners over how best to share evidence. Developing effective data sharing platform takes time and resources.

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

The [State of Natural Resources Report \(SoNaRR\) 2020](#) emphasises the interconnectedness of environmental, social, and economic well-being. It highlights the significant pressures on Wales' natural resources, including climate change, habitat loss, pollution, and invasive species. Addressing the complex challenges facing nature requires a holistic approach that considers the interconnectedness of different systems, such as food, energy, and transport. The report introduces the concept of "Bridges to the Future" as a framework for achieving a sustainable future.

The nature and climate emergencies make clear the current economic and financial system is not currently delivering for people or the planet. Built on maximising growth and short-term profits, our current economic model is imposing enormous costs on communities and nature. A greener sustainable economy requires a change in the relationship between the economy, land and water. It is about redesigning it to deliver good quality livelihoods by working in service of each other, meeting the needs of all, valuing and measuring what actually matters, redefining societal progress, and putting delivery of long-term wellbeing and prosperity of all generations before narrow metrics focused on GDP growth.

It is clear new approaches, such as green finance, are needed to generate the capacity and increased financing required and move away from business as usual- where some structured proactive, plus ad-hoc or reactive work takes place - to embedding continuous nature improvement with business and society. The Biodiversity Deep Dive focussed on one target of the GBF to act as a catalyst to draw in the other GBF 22 targets. It is our view that GBF targets 14-23, which focus on generating increased capacity and mainstreaming biodiversity action (e.g. embedding biodiversity into all decision-making processes, addressing negative incentives and creating positive ones, and working with new stakeholders) are key to deliver the desired ambition. Without this transformative change we believe it unlikely the goal to halt loss and restore nature will be achieved, not only by 2030 but well beyond.

Agriculture currently accounts for the largest land use area in Wales (80-90 %). Agriculture has a prominent role in nature recovery as the majority of our protected sites are linked to farming. We are supportive of the principle in the Sustainable Farming Scheme (SFS) that farmers are funded to deliver environmental goods and services, not at the expense of food, but as an integral part of the products delivered through Welsh farming. Research, development and innovation is the cornerstone of sustainable futures and farmers need new sources of funding beyond the public purse to take advantage of precision farming and Earth observation technologies for example. We would welcome discussion on the scope and appetite to leverage funding to explore potential synergies between the SFS and well-regulated green investment from the private sector making progress towards a regenerative Welsh economy.

The emerging 30 by 30 monitoring requirements will influence Welsh nature recovery with an increased focus on network approaches, effective management assessments, and leveraging Earth observation technologies. How the monitoring community in Wales collectively address these challenges will require improved data sharing and collaboration.

To accelerate nature's recovery it is essential that the tools available complement and deliver for nature and not conflict or detract from each other. The biodiversity outcomes from the WG deep dive can and should be developed to complement and provide resources and impetus to existing long standing and strategic areas of work such as Local Nature Recovery Plans, Area Statements, Resilient Ecological Networks and Green Infrastructure Assessments.

Nature Networks provides the opportunity to develop a strategic approach to restore and enhance the Welsh landscape by linking Resilient Ecological Networks throughout Wales supported by Area and landscape partnerships.

In Wales farmers own and manage much of the land, the place-based approach facilitated by Area Statements and RENs can identify outcomes in the landscape which empower and delegate decision making to local partnerships and individuals.

Current funding approaches to halt and reverse loss of nature by 2030 tend to be short term, capital heavy, and opportunistic with limited focus on long term management and evaluation. A more strategic, longer-term approach, with greater funding for revenue activity and for long term monitoring/ evaluation and management would be more sustainable and impactful in terms of outcomes for nature.

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

Alongside a greater focus on direct delivery for habitats, species and ecosystems through mechanisms like the Ministerial 30 by 30 Deep Dive for example, it is becoming increasingly clear how essential it is to also generate increased capacity and financing

needed to holistically achieve the commitments of the UK Strategy and corresponding recovery ambitions of the Global Biodiversity Framework (GBF). In parallel, there is also rapidly growing demand for information and increasing interest by other sectors in relation to their nature-related impacts, dependencies and opportunities.

The UK's National Biodiversity Strategy and Action Plan (UK NBSAP) and associated Welsh commitments, we are extremely supportive of the Cabinet Secretary's commitment to produce statutory nature targets for Wales along with strengthened monitoring and reporting to more fully embed and drive action and accountability.

We would like to see Welsh nature targets and the new Bill reflect this alongside direct action to improve habitats, species and ecosystems, and more comprehensively address the issues and negative pressures and drivers that are responsible for biodiversity loss. We would also like to see greater recognition and emphasis placed on working more actively, creatively and collaboratively with the wide range of sectors and institutional and other interests that are not currently engaged in restoring nature.

The GBF, and associated UK strategy and targets containing Wales' nature commitments, presents a significant opportunity to enhance Wales' biodiversity efforts and develop new approaches. Pursuing a broader, proactive approach alongside more focused habitats and species interventions is crucial for halting nature loss. Ensuring that all the GBF targets as outlined in the UK's strategy for Wales are incorporated into Welsh policy and new legislation will help provide a comprehensive, clear and measurable framework for tracking progress and holding policymakers and key delivery agents to account.

The marine environment makes up almost half of Wales and protecting and restoring biodiversity here will form a significant part of delivering nature recovery. However, the nature of activity needed to protect and manage ecosystems at sea often differs from approaches taken on land. It is also affected by almost everything that happens on land, emphasising the need for holistic approaches and uses of appropriate 'terrestrial' levers (such as the SFS and Planning Policy Wales) to deliver positive marine outcomes.

Planning Policy Wales (PPW) includes the need for plans and projects to enhance biodiversity and ecosystem resilience in development planning becoming more commonly known as Net Benefit for Biodiversity (NBB). However, developing planning policies such as NBB, nature-based solutions and renewable energy assessments are not yet supported by guidance for Local Planning Authorities which may be a missed opportunity to embed S6 into development planning functions. We see a gap in current guidance to support policy delivery as well as a need to establish a clear NBB policy.

Several key developments including the Global Biodiversity Framework, Ministerial Biodiversity Deep Dive, and State of Nature 2023 have been published since the Environment (Wales) Act 2016 was published. As a result, Section 6 guidance needs to better reflect the scale, pace and transformational changes required to respond to the nature emergency and more active monitoring and clearer accountability is needed in relation to S6 delivery. The nature emergency declaration emphasises the importance of

the duty and public authorities can be expected to demonstrate a stronger commitment to biodiversity in their decision-making process.

We would like to see greater attention focusing on how to change and develop systemic and institutional decision-making processes across all sectors to better support nature recovery. These are crucial for generating the increased capacity, delivery opportunities and joint financing needed to enable everyone to help restore nature in line with the nature commitments for Wales and move us beyond reliance on and the limitations associated with current government mechanisms and funding.