

Dr Andrew Goodall CBE

Permanent Secretary of the Welsh Government

24 March 2025

Dear Dr Andrew Goodall,

Re: Staffing and resources in Welsh Government for biodiversity and nature recovery

I am writing to you following the [Welsh Government's response](#) to the Climate Change, Environment, and Infrastructure Committee's [report on Halting and Reversing the Loss of Nature](#).

Our report highlights a worrying trend of delays in meeting commitments made by the Welsh Government to support Wales' response to the nature crisis. This includes commitments to revise key nature policy documents and to develop statutory targets aligned with global biodiversity commitment. We are concerned that this may be due, at least in part, to a lack of capacity and resource within the relevant Welsh Government division.

Delays in the review of the Natural Resources Policy (NRP)

The Welsh Government is required to review the NRP after each general election. As we near the end of the fourth year of the Sixth Senedd, a review has yet to be completed.

In our report, we recommended that "The Welsh Government should explain the reason for the delay in completing the review of the NRP."

In its response, the Welsh Government stated: "*The Welsh Government, following the 2021 Senedd general election, decided to postpone the review of the Natural Resources Policy (NRP). This decision was made to allow the Welsh Government to focus on delivering Programme for Government commitments including four Senedd Bills / Acts and a range of actions which would lead to a positive impact on natural resources.*"



Delay in Publishing the Nature Recovery Action Plan (NRAP)

The NRAP is meant to set out how the Welsh Government will halt and reverse the loss of nature by 2030. Two years after committing to the Global Biodiversity Framework (GBF), a revised NRAP has yet to be published.

In our report, we recommended that "The Welsh Government should explain why the revised NRAP was not published in May 2024, as anticipated".

In its response, the Welsh Government stated: "*Given the tight legislative timescale for bringing forward the Environment (Governance, Principles and Biodiversity Targets) (Wales) Bill and its associated elements, officials' time has been prioritised to meet this critical deadline. Despite resource and capacity constraints, the Welsh Government has continued to collaborate across the UK to develop the UK National Biodiversity Strategy which was published on the 26 February 2025.*"

Delay in Developing Biodiversity Targets

We were concerned that biodiversity targets may not be set until 2029 – a year before the GBF 2030 targets, including the key 30 by 30 target, need to be met. The UK Government has already set biodiversity targets for England, and Scotland is also ahead of Wales.

In 2023, the then Minister for Climate Change assured this Committee that work on "scoping appropriate targets" was already underway.

In correspondence with the Committee, the Cabinet Secretary explained that targets would not be in place until at least 36 months after the Environmental Governance Bill receives Royal Assent. The rationale for this is that "*Creating the secondary legislation alone takes 12 months at a minimum (from consultation through to introduction), depending on the allocated plenary slot.*" Given these timescales, we were not persuaded by the need for a 36-month delay.

Finally, the timing of the Bill means that implementation of its provisions will be a matter for the next Welsh Government. This raises a fundamental concern that the current Welsh Government will not be able to implement its priorities during its term of government. Depending on the make-up of the next Welsh Government, this may mean that these commitments may never be delivered.

The need for a review of staffing resources

Given the numerous delays outlined above, we made the following recommendation:

"In light of the significant delay to the development of targets, and given that this is a priority of the Welsh Government, the Welsh Government should undertake an urgent review of the resources allocated to departments dealing with this policy area with a view to satisfying itself

that these are sufficient. It should report back to the Committee on the findings of the review within 3 months of the publication of this report."

This recommendation was rejected on the basis that staffing is a matter for the Permanent Secretary, working "within the budget allocated by Ministers and in line with their priorities". However, the evidence presented to the Committee strongly suggests that staffing shortages and resource constraints are affecting the Welsh Government's ability to deliver its commitments.

Given that addressing biodiversity loss has been identified as a key priority for the Welsh Government, I would be grateful if you could clarify how staffing resources have been allocated and adapted to ensure the delivery of these commitments. I would appreciate your response to the following questions:

1. What discussions have you had with cabinet members about the allocation of staffing resources in this policy area?
2. Can you provide details of the staffing levels assigned to support the development of biodiversity targets since the start of this Senedd term? How has this changed over time?
3. What specific resource constraints have impacted the progress of the development of biodiversity targets, and what steps have been taken to mitigate these constraints?
4. Given that a dedicated team has now been established, what additional capacity has been allocated to ensure timely development of the targets?
5. What processes are in place to assess whether staffing allocations within relevant departments are sufficient to meet the Welsh Government's biodiversity commitments?
6. What mechanisms exist to ensure that workforce planning within your department aligns with Government priorities and prevents resource shortages from hindering key policy developments in the future?

I look forward to your response.

Your sincerely,



Llyr Gruffydd MS,
Chair, Climate Change, Environment, and Infrastructure Committee
Croesewir gohebiaeth yn Gymraeg neu Saesneg. / We welcome correspondence in Welsh or English.