

Huw Irranca-Davies MS

Deputy First Minister & Cabinet Secretary for Climate Change and Rural Affairs

2 June 2025

Dear Huw,

Thank you for attending the Committee's meeting on 27 March 2025 to discuss Welsh Government policies on Climate Change and Rural Affairs. The Committee agreed that I should write to you to request clarification of several issues raised during the session.

Forestry and woodland

The Committee remains concerned that tree-planting rates remain considerably below the Welsh Government's target of 43,000 ha of new trees by 2030 (almost 5,000 ha per year), rising to 180,000 ha by 2050 (over 6,000 ha per year), as recommended by the UK Committee on Climate Change (CCC).

When asked if this remained your target, you said: "I think it's hugely stretching, but I think we are committed to working towards that target."

1. Please could you confirm that the Government is committed to its target of 43,000 ha of new trees by 2030 (almost 5,000 ha per year), rising to 180,000 ha by 2050 (over 6,000 ha per year)?

Just as important as the overarching target is the detailed work on how the target is to be achieved.

During the discussion, you set out that the Government is "trying to work through the [Trees and Hedges Stakeholder Delivery] group now to say what the trajectory will be. Do we go very early and steep? Do we have a more level line towards doing it? That's the discussion we're currently in."

2. Bearing in mind that the target has been in place for over four years, it is important that these discussions are brought to a conclusion swiftly. We would like you to share with the Committee the year-on-year milestones that Government will require to meet these targets.

As you set out to the Committee, tree planting will require action not just from Government but from other stakeholders too. However, the Committee did not get a sense from your answers of the quantum of tree planting that will be achieved on public sector land.

3. Could you set out for the Committee how the Government will achieve significant tracts of new planting on Welsh Government land?
4. Additionally, could you set out for the Committee how the Government will achieve significant tracts of new planting on non-Welsh Government land?

You stressed the work of the Sustainable Farming Scheme in achieving improved tree-planting rates. We saw opposition to tree planting from farmers during the SFS consultation last year and tree planting will now be an optional action, rather than mandated under the scheme.

The question remains for the Committee, what will the Government do specifically to encourage behavioural change?

During the Committee session Gian Marco Currado said payments will be at risk if farmers don't make progress on the plan.

5. Please could you set out for the Committee how will the Welsh Government define "progress" in delivering tree planting through the new SFS? How will you ensure that this is meaningful and does not just amount to "one more tree"?
6. Could you share the membership of the SFS Trees and Hedges Stakeholder Delivery Group with the Committee, as you indicated you would?

In terms of the work of the above group, Clare Bennett said that she saw it as "an action-orientated group" rather than producing "some grand report".

7. The Committee would be grateful if you could share the work programme of the group and the likely outcomes and outputs that you expect from their work, together with timescales.

The Committee also notes that you have not yet consulted the UK Climate Change Committee (UKCCC) on the proposed changes to the SFS scheme design around tree planting but that you will do so when the scheme design is finalised. The final scheme is expected in the summer.

8. Could you explain when you expect to consult the UK CCC and how will you ensure that the Government will have necessary time to take account of its input?

The Committee would also be interested to understand how the new SFS scheme will help to achieve other policy goals. For example, the Committee is currently taking evidence about the recent floods.

9. How will the Welsh Government ensure that the SFS is used to promote the planting of other plants as a preventative measure against both flooding and run off from farms? Specifically, the Committee would also be interested to understand what more can be done to encourage the use of continuous cover forestry when NRW are engaged in clear felling operations.

The Committee is also particularly interested in the work of the Woodland Finance Working Group to look at models to attract private investment that avoid disadvantaging rural communities and disrupting existing patterns of land ownership. You said that your thinking “has moved on apace” on this.

10. When will the Woodland Finance Working Group conclude its work and publish its outputs?

Air quality

As you know, the Environment (Air Quality and Soundscapes) (Wales) Act places a duty on the Welsh Ministers to set an air quality target for PM2.5 by 2027. The Committee welcomes your confirmation that you will consult upon this in autumn of this year.

11. Could you confirm when you expect to meet your statutory duties under the Act (in advance of the hard deadline of February 2027, set out in the Act)?

In relation to the (now closed) consultation on local air quality management and smoke management guidance, we discussed the view of Asthma and Lung UK that this “fails to provide the necessary ambition and clarity required to protect public health”. You committed to reflect on that feedback.

12. The Committee would urge you, in doing so, to consider how the draft guidance can be strengthened.

The Committee remains concerned about the slow rate of delivery in relation to other planned consultations. You said that the following consultations originally planned for autumn 2024 will now commence this month:

- a delivery plan for promoting awareness of air pollution;
 - regulations to set a penalty range for the offence of stationary vehicle idling.
13. You originally timetabled for these to be implemented (following an autumn 2024 consultation) in spring 2025. Given the delay, can you confirm that you will still be able to implement this year?

Similarly, you previously advised the Committee that you intended to consult on draft regulations on domestic burning of solid fuels in early 2025, with a view to laying regulations in autumn 2025. You have not yet laid a draft.

14. Could you update the Committee on your timetable for bring forward these regulations?

Biodiversity

As we discussed, Audit Wales has published its study on implementation of the “biodiversity and resilience of ecosystems duty” by public authorities. This duty arises from section 6 of the Environment (Wales) Act 2016.

The anticipated Environment (Principles, Governance and Biodiversity Targets) (Wales) Bill is expected to introduce a new biodiversity framework and targets. You have said that the Government will use the existing section 6 duty as a mechanism for public authorities to contribute towards the biodiversity targets.

The current duty requires public authorities to “maintain and enhance biodiversity so far as consistent with the proper exercise of their functions and in so doing promote the resilience of ecosystems”.

It is therefore a matter of concern that almost half of public authorities included in its study have not complied with the section 6 duty to both prepare and publish a biodiversity plan. The Committee notes your view that, despite this lack of compliance, the duty has still driven positive change. However, this situation is far from ideal.

Given poor implementation of the biodiversity duty, it is incumbent on the Government to explain how it intends to improve awareness and delivery, either through the Bill or new guidance. The Committee will wish to look at that matter closely during the scrutiny of the legislation.

Secondly, the fact that the Welsh Government itself is failing to comply with the duty should alarm you, just as it alarms the Committee. The Government cannot credibly expect other public authorities to fulfil this legal duty if the Government itself does not do so.

15. Could you set out how you will improve your own compliance with this duty and that of other public sector bodies and the timetable for doing so?

Deposit Return Scheme (DRS)

You explained that the (previous) UK government has diverged from the original four-nation approach to the Deposit Return Scheme (DRS) and that this was why the Welsh Government withdrew from the planned UK-wide DRS in late 2024. You confirmed to the Committee that you wish to develop a scheme that includes glass.

You will be aware that in 2023 the UK Government used its powers under the UK Internal Market Act to prevent the Scottish Government from including glass in its planned DRS.

In answer to the Committee's questioning you stated that

"We haven't gone to seek an exemption from UK Government on the United Kingdom Internal Market Act 2020 because we've been working, now, in partnership. It's a very different approach now."

16. It is the Committee's view that, given your intention to consult on a Wales-only DRS to include glass, this should be taken forward having had reassurance from the UK government that Wales will not be prevented from introducing the scheme. Will you seek such a reassurance before launching the public consultation?

I should be grateful for a response as soon as possible, and by 30 June at the latest.

Yours sincerely,



**Llyr Gruffydd MS,
Chair, Climate Change, Environment and Infrastructure Committee**

Croesewir gohebiaeth yn Gymraeg neu Saesneg | We welcome correspondence in Welsh or English.