
**Representation to
The Environment and Sustainability Committee of the National Assembly for Wales
by Plantlife Cymru on our experience of working with Natural Resources Wales.**

Preamble

1. Plantlife Cymru is part of Plantlife International, a charity established in 1989 to campaign for and protect wild plants and fungi in their natural habitats, to educate people so as to improve their understanding, appreciation and awareness of the value of plants and the need for conservation and to undertake research and study to further their conservation.
2. Plantlife Cymru has been active in Wales since 2002 and has two grassland nature reserves, one at Lampeter and the other on the Llŷn peninsula. It also operates in partnership with other bodies such as the RSPB, National Trust, BSBI and NRW to carry out active conservation of Wales threatened flora. For example for the last 5 years we have worked with Bridgend County Borough Council and NRW to undertake practical work at Kenfig NNR/SAC to remobilise dunes and conserve threatened plants such as the fen orchid.
3. One of the most important areas of work that has been undertaken in Wales, as elsewhere throughout the world, is the scientific identification of Important Plant Areas (IPA's). There are currently 24 IPA's in Wales covering an area of 830,000 hectares. Many of the IPA's overlap with the existing Special Areas for Conservation (SAC).

Our views on working with Natural Resources Wales

4. In our operations in Wales we have dealt with over 30 staff from NRW in a wide variety of roles over the last 12 months. We would wish to record here that we remain impressed by their dedication, enthusiasm and professionalism, especially during a period when they are losing colleagues and expertise, taking on additional responsibilities and operating in an environment where budgets are increasingly restricted due to the constraints of public funding.
5. We would also like to record the proficiency with which staff at NRW managed the Resilient Ecosystem Fund, of which we were a recipient, and the aims of the fund which we feel have enabled essential conservation work to be undertaken. For example, our award within the Meirionnydd Oak Woodlands has allowed us to carry out essential work to conserve lower plants and to lay the foundations of a much larger project which we are working on with RSPB that, if successful, would draw down £3m of EU LIFE funding into further practical conservation work. This is in stark contrast to, say, the management and distribution of the Nature Fund.

Joint Working Partnership and Competitive Funding

6. Plantlife Cymru has been a participant in a funded Strategic Partnership with CCW (later NRW) since 2010.
7. Like many conservation organisations we sought to refresh our Strategic Partnership with NRW when a new round of funding for Joint Working Partnerships was announced in 2014.
8. Unlike the previous arrangement that existed between CCW/NRW and Plantlife Cymru, the new partnership did not entail any agreement between the parties on what the conservation priorities were for Wales for plant conservation nor what each organisation would mobilise in terms of staff and financial resources to deliver a jointly agreed programme. Rather the partnership, if it could be called one, sought to deliver NRW's Business Plan which made little reference to plant conservation other than Business Plan Priority Area E3 - *'Play our part in halting biodiversity loss, to ensure that by 2020 ecosystems are more resilient'*. In effect, NRW were offering third sector conservation organisations a grant to help deliver parts of their Business Plan and this is not a partnership.
9. In sending out the information connected with the JWP a copy of the Business Plan was provided and indications of where organisations were allowed to make submissions for partnership funding. It subsequently came to light on the 9th September that an out of date version of the Business Plan had been used and, crucially for conservation bodies, that the Business Plan Priority Area E3 was the section affected. This is the one section where conservation bodies could assist NRW and therefore make proposals. Bearing in mind that the bids had to be submitted to NRW by 30th September, this left just 15 working days for charities and other organisations to revise and redraft their bids.
10. As part of the development process for both the JWP & Competitive Funds, two workshops were held to inform applicants. At the Cardiff event, held on the 18th July, following a specific question about Full Cost Recovery (FCR), it was asserted that NRW would support FCR and this was further established in the documentation - on page 2 of the guidance document. The principle of FCR is also one of the Funding Principles set out in the Welsh Government 'Code of Practice for Funding the Third Sector'¹. Having submitted bids for both funding streams we were dismayed that in awarding funds NRW had unilaterally capped the amount allowed for FCR to just 7%. In our view this is unrealistically low and in contravention of the spirit of the Third Sector Scheme. In my 5 years as a Chief Executive of a Wildlife Trust the percentage for FCR varied between 12% and 16% dependent on the project. Such figures were accepted by funders such as HLF and the Big Lottery. For most organisations that were offered funding this means that they will now have to raise additional funds or subsidise their grant offers from NRW as the explanation for the 7% cut off was, *"to make our funds go further"*.
11. Similarly after applications had been made under both programmes NRW also capped the mileage rate at 25p/mile which is contrary to the recommended allowance on the HMRC website², currently 45p/mile, and which is used by most charities to determine mileage rates as well as the Welsh Assembly. This too will mean further fund raising or charities and groups using their own finances in order to receive funds from NRW.

¹ Welsh Government, January 2014

² <https://www.gov.uk/rates-and-thresholds-for-employers-2014-to-2015>

12. This leads to a more general criticism that the whole process of grant and partnership working with NRW is not iterative or inclusive either with the applicant or it appears within NRW.
- 12.1. As a responsible conservation body we expended a great deal of effort in trying to match the conservation needs of Wales for plant conservation with the Business Priority Areas within NRW's Business Plan and to further prioritise so that only the most important and significant projects were submitted. In addition we consulted NRW staff pre-deadline, restructured our bid accordingly and submitted it in such a way that elements could be removed without compromising the whole programme. Once submitted there was no further discussion with anyone, other than our contact officer at NRW. We had expected, due to the general environment of austerity, to be approached with a view to reducing the scale and/or extent of the programme or to be informed where NRW's priorities were for plant conservation and adjusting the programme accordingly. This never happened. As both the Botanical Society for Britain and Ireland nor ourselves achieved funding through the JWP, this leaves plant conservation very much weakened in Wales, which is especially concerning considering that 40% of the section 42 species of the NERC Act are plants or fungi and that Wales holds 73% of UK moss and liverwort species and 74% of the UK lichen species.
- 12.2. The written feedback stated, *"Although this is a valuable proposal, the scale of it, when compared with the available budget, means that the individual projects need to be prioritised to bring costs down."* If there had been any discussion with Plantlife or with the contact officer in NRW then it would have been clear that the projects were already in priority order and that they could easily have been reduced in scale or extent albeit with reduced outputs/outcomes.
13. Like many conservation organisations we now feel that where we had once been valued as an active and contributing partner with CCW/NRW in conserving our Welsh wildlife and landscapes and engaging people in education and the understanding of it, we are now simply recipients of grant aid.
14. Decision informing and feedback.
- 14.1. Information in the written feedback was inaccurate. The feedback stated that, *"Plantlife should work closely with the WBP ecosystem, species, INNS and local groups to add value to delivery wherever possible"*. As an organisation we already attend WBP ecosystem, species and INNS groups and contribute to achieving their work plans. We also indicated in our application that we would be working with a minimum of 8 partner organisations.
- 14.2. One of the verbal criticisms of the Plantlife JWP bid was that it did not contain a 'Delivery Plan'. However we would point out that in none of the guidance sent out by NRW was there a specific request to supply such a Plan. To penalise us for failing to provide something that was not requested seems unfair.
- 14.3. For many third sector organisations the use of volunteers is both essential in the delivery of our work and an excellent way to engage with local communities, supply training and work experience and deliver education and understanding. We were therefore disappointed to hear in our verbal feedback that a bid which relied on volunteers to deliver part of its outputs was viewed as 'too risky'. The preference was for contractors to deliver despite the inevitably higher costs and the lower social

returns. We feel that NRW needs to review its approach and understanding of the role of volunteers in the third sector.

14.4. Our current NRW JWP has delivered over £500,000 of additional funding into the conservation sector in Wales. In setting out our new JWP with NRW we also calculated the value of additional external funding that Plantlife and its partners would bring to the sector over the next 10 years. This amounted to £7.6m. In terms of a multiplier effect, this would have meant that for every £1 invested by NRW in the JWP, £4 of external funding would have been generated. At a time of severe pressure on public funding we are surprised that NRW did not appear to consider the effect of such multipliers in its evaluation.

15. Timeliness of decisions. This is another of the Funding Principles set out in the Welsh Government 'Code of Practice for Funding the Third Sector Third Sector'. The letter informing us that we had not been successful in the initial phase was sent out on the 12th December but informed us that we were on a 'reserve list' and that a decision would be made in '*the first quarter of 2015*'. This is contrary to the timetable set out in the report to the NRW Board in April 2014 which, on page 9, indicated that "final recommendations on funding" would be made by the end of December 2014³. For charities such unknowns make financial planning very difficult and for some, such as BSBI, they have already served redundancy notices on their staff. A final decision of whether Plantlife Cymru receives any JWP funding will not be made until 13th April. There needs to be more certainty to allow charities to plan and more proficient delivery of results.

General concerns

16. As a conservation body operating in Wales we remain concerned that NRW does not fully appreciate the legal obligations it has for nature conservation and the role of the environmental conservation sector has in trying to help it to meet them. It feels to us that Senior Managers in NRW don't fully understand its obligations under and its responsibilities for the Convention on Biological Diversity, the Global and European Strategies for Plant Conservation, the Aichi Biodiversity targets, the Habitats and Species Directives, the management and condition of Natura 2000 sites (SAC/SPA), the notification and management of SSSI's and NNR's and Section 42 species and habitat lists of principal importance in Wales under the Natural Environment and Rural Communities Act. The conservation sector wants to see a fully engaged NRW giving leadership in conserving both habitats and species within its role as curator and guardian of Wales's natural resources.

17. We remain concerned that the level of resources dedicated to conserving our natural heritage is diminished within NRW through the amalgamation of the three former constituent organisations and that assertions that it has not declined must be backed up by a much more open and accountable reporting of processes and finances. NRW's role, outlined in part in 16 above, should be enshrined in the forthcoming Environment Bill and it should have a statutory responsibility for delivering "A Resilient Wales" under the Well Being of Future Generations (Wales) Bill.

³ NRW Board Paper, Partnership Funding Strategic Approach, 3 April 2014:ref NRW B O 25.14

18. In meeting its ‘*Good for the Environment*’ purpose of “*wildlife and landscapes are enhanced*” within its Business Plan, NRW needs to recognise the importance of biodiversity and seek to have a meaningful and genuine partnership with the environmental and conservation sector if we are to address issues of declining biodiversity, as outlined in the State of Nature Report⁴, and to make a contribution to the social, environmental, economic, cultural and spiritual life of Wales for those who live in and those who visit our wonderful country.

⁴ State of Nature ; Wales, RSPB on behalf of 25 conservation organisations, 2013