

Lesley Griffiths AM
Cabinet Secretary for Environment and Rural Affairs
Welsh Government

16 October 2017

Dear Lesley,

Natural Resources Policy for Wales

The Climate Change, Environment and Rural Affairs Committee held a stakeholder workshop on 4 October to discuss the Welsh Government's Natural Resources Policy ('NRP'). A list of those who attended is attached at Annex 1. This session was part of our follow up scrutiny of the Environment (Wales) Act 2016 ('the Act').

The NRP is a significant output arising from the Act and is intended to form a key part of the delivery of the sustainable management of natural resources. As such, we believed it was important to hear from stakeholders at an early stage, to seek initial views on the policy, to inform the process of implementation and to suggest improvements for the next iteration of the policy.

Purpose and alignment with the Environment (Wales) Act 2015

We sought stakeholders' views on the extent to which the policy aligns with its purpose as set out in the Act. Generally, stakeholders were concerned that the NRP is aspirational, with an absence of clear outcomes to achieve the sustainable management of natural resources. There is a lack of clarity about how those aspirations will be translated into actions.

Stakeholders believed that there should be greater clarity in the NRP of the Welsh Government's desired balance between economic, environmental, social and



cultural considerations. This would aid practitioners and decision-makers to implement the NRP appropriately.

1. Will you issue guidance on the balance between the economic, environmental, social and cultural considerations that should be the basis of the decision-making and implementation process?
2. How will you address stakeholders' concerns about the lack of clear objectives and measurable outcomes in the NRP?

Implementation of the NRP

Stakeholders believed that the NRP could be strengthened through the inclusion of a set of robust performance measures and targets. The absence of targets and indicators in this first iteration of the NRP was a missed opportunity. Targets should include, but not be limited to, biodiversity, afforestation, emissions reductions and renewable energy. Such targets would give a clear direction to practitioners which, unfortunately, is currently missing.

Given the lack of detail in it, stakeholders emphasised the need for further discussion and engagement with practitioners about implementation of the NRP.

Stakeholders emphasised the need for the Area Statements approach to be robust and rigorous if the NRP is to be effective. It is vital that NRW, local authorities and Public Services Boards have sufficient resources to implement Area Statements in a meaningful way. Otherwise, the NRP may not be realised fully.

Stakeholders commented on the importance of collaboration to deliver the NRP. However, they were concerned that the NRP does not appear to facilitate a collaborative approach. The policy was a missed opportunity for Welsh Government to demonstrate leadership by improving joint-working across government departments. It was felt that a framework would be useful to ensure a joined up approach and to drive increased collaboration.

Furthermore, stakeholders did not believe the NRP recognises the importance of collaboration across the private, public and third sectors. Indeed, they believed that there is an imbalance at the heart of the NRP, namely that it is the public sector that will be expected to deliver the NRP even though 80% of land in Wales is



in private ownership. This will clearly have implications for the outcomes that can be achieved by the NRP.

3. Will you clarify how you expect Area Statements to deliver the NRP in practice? Will you prepare and publish guidance for NRW setting out how you expect the NRP to inform the development of Area Statements?
4. How will you support and facilitate collaborative and partnership working to ensure delivery of the NRP?
5. Can you provide the Committee at the earliest opportunity with details about the measures and indicators you will use in the NRP evaluation framework? Will you consult stakeholders on the evaluation framework? When will the evaluation framework be published?

Alignment with domestic and international policies

Stakeholders raised several issues relating to a perceived lack of clarity about how the NRP other policies or Welsh legislation relating to natural resources fit together. They referred to the Well-being of Future Generations (Wales) Act, the Nature Recovery Plan, the Welsh National Marine Plan, Taking Wales Forward, and planning mechanisms such as those in Planning Policy Wales.

They believed it was necessary to have a clear, published, framework to clarify how these policies integrate with the NRP and to set out the NRP's status within that framework. Furthermore, clarity is needed about how the Welsh Government intends to bring all of these policies together to drive forward progress in this area. In particular, the Welsh Government should clarify how it ensures there is a balance in its decision making processes between economic development and nature recovery.

Stakeholders did not believe that there was a clear alignment between the NRP and the five ways of working in the Well-being of Future Generations (Wales) Act. Furthermore, a complete assessment of the use of natural resources in Wales



should include the use of resources provided by ecosystems elsewhere. Consideration of Wales's global footprint will be required to assess progress towards the Well-being goal; 'a globally responsible Wales.'

Stakeholders also highlighted the potential impact of planning regulations in delivering changes which have an impact on the natural environment.

On the matter of international policies, it was suggested that the NRP's goals should be mapped against global targets such as the Sustainable Development Goals. This would enable an assessment of the contribution of the NRP to global targets. The NRP addresses the EU Biodiversity Strategy (EUBS) targets in several ways. It recognises the importance of protected sites (both terrestrial and marine) to enhance the resilience of ecosystems. This aligns with Target 1 of the EUBS. Green infrastructure, ecosystem services and habitat restoration align with Target 2 of the EUBS. References in the NRP to safeguarding soil quality links to Target 3 of the EUBS to increase the contribution of agriculture and forestry to maintaining and enhancing biodiversity. Finally, although arguably not as strong a link as those previously mentioned, Target 6 of the EUBS – global biodiversity loss – links to the NRP via resource efficiency and climate change.

In relation to the future of natural resource management policies, stakeholders recognised that there is a degree of uncertainty arising from the decision to exit the EU. The extent of the implications for existing policies and future policy-making in Wales is currently unclear. However, stakeholders believed that the Welsh Government should take this opportunity to set out its vision for the future and to clarify what its priorities in this policy area will be after the UK has exited the EU.

6. How have international policies and global targets informed the development of the NRP? Will you consider how the indicators and targets in the NRP's evaluation framework can work alongside international targets?
7. How will you address the call from stakeholders for the Welsh Government to set out a clear vision for the future policy direction for the sustainable



management of natural resources and clarify its priorities post-Brexit?

8. How does the NRP deliver the goals of the Well-being of Future Generations (Wales) Act 2015?
9. Do you intend to revise Planning Policy Wales in light of the NRP?

Use of evidence

Stakeholders expressed concern that there appears to be a disconnect between the NRP and SoNaRR. For example, it does not address the failings of resource management identified in SoNaRR. It was suggested that each Chapter should include references to the relevant SoNaRR findings, to clarify how they have informed particular sections of the NRP.

Data deficiencies in SoNaRR were also highlighted as a cause for concern and stakeholders emphasised the need to fill gaps in order to improve future policy development.

10. How will you address the comments by stakeholders about the need for the NRP to show more clearly how it has been informed by SoNaRR data?
11. How are you planning to address the deficiencies in the data in SoNaRR?

Timescales and engagement

Stakeholders commented on the consultation process that informed the development of the NRP. There was concern that a final draft of the NRP had not been seen by Public Service Boards before publication, given that their contribution is crucial to delivery. This caused further concern for some about the extent to which the Welsh Government intends to work with local government in implementing the NRP. Other stakeholders expressed disappointment that they had not been consulted on a draft of the NRP.



Stakeholders were also concerned that SoNaRR, the principal evidence base for the NRP, will be compiled every five years. There are risks that a lack of up-to-date evidence will mean that the Welsh Government is less likely to be able to respond quickly to risks to the state of natural resources, if necessary.

12. What are your plans for reviewing and amending the NRP?
13. Can you set out how the Welsh Government will engage with Public Service Boards in the implementation of the NRP?
14. Do you have any plans to assess the appropriateness of the timing and frequency of SoNaRR?

Thank you for considering these issues. The NRP offers an opportunity for Wales to be a leader in the sustainable management of natural resources, but only if those responsible for delivering it are clear on their roles and objectives and are resourced sufficiently for that purpose; and that progress is measured appropriately at each stage.

I would be grateful if you could respond to the Committee by 1 December 2017.

Yours sincerely,



Mike Hedges AM

Chair of Climate Change, Environment and Rural Affairs Committee

