

Cynulliad Cenedlaethol Cymru | National Assembly for Wales
Y Pwyllgor Newid Hinsawdd, Amgylchedd a Materion Gwledig | Climate Change,
Environment and Rural Affairs Committee
Ymchwiliad Bioamrywiaeth | Biodiversity Inquiry
BIO 03
Ymateb gan: Sefydliad Siartredig Ecoleg a Rheolaeth Amgylcheddol (CIEEM)
Evidence from: Chartered Institute of Ecology and Environmental Management
(CIEEM)

Biodiversity – Public Goods Scheme Inquiry

We welcome the opportunity to respond to the Climate Change, Environment and Rural Affairs Committee inquiry into biodiversity and the proposed public goods scheme. If you would like any further information, please contact CIEEM Policy and Communications Manger JasonReeves@cieem.net.

We strongly support the Welsh Government's suggested approach of rewarding land managers for the delivery of public goods. In our response to the consultation, we highlighted a number of biodiversity-related concerns which need to be addressed in order to have maximum impact. For more information regarding CIEEM's position on the Brexit and Our Land consultation, please view our consultation response¹.

Comments from CIEEM

1. As utilised agricultural land in Wales constitutes around 88% of land area², a shift towards payment for environmentally related public goods could have a considerable impact on the restoration of biodiversity.
2. Payment for public goods can incentivise the creation of resilient habitats and ecosystems by improving habitat connectivity (making bigger, better, more connected wildlife areas) across the Welsh landscape. This is particularly true as the Brexit and Our Land consultation specifies it will be open to all land managers.

For this to happen, the scheme would need to be implemented at a strategic, landscape-scale, encouraging land managers to restore the most beneficial habitats for that area. This could be implemented through the application of Area Statements published by Natural Resources Wales (NRW)³.

3. General untargeted actions should be avoided as they provide low value for money and have been shown to be ineffective at conserving biodiversity⁴.

¹ https://www.cieem.net/data/files/2018_10_30_Brexit_Our_Land_-_CIEEM_response_FINAL.pdf.

² *The Farming Sector In Wales* (2016) National Assembly for Wales, Cardiff.

³ <https://naturalresources.wales/about-us/area-statements/?lang=en>

⁴ Keijn D. & Sutherland J. (2003) How effective are European agri-environment schemes in conserving and promoting biodiversity?, *Journal of Applied Ecology*, 40(6), 947-969. Available at: <https://besjournals.onlinelibrary.wiley.com/doi/full/10.1111/j.1365-2664.2003.00868.x>

4. Long-term contracts (for example 25 years) based on outcomes would also be needed to ensure recovery into the future. The narrative and relationship between land manager, government and taxpayer must change from one of support or subsidy. In a new system the government, and ultimately the taxpayer, is the customer and the land manager is the service provider. Contracts would be commercial transactions securing better and more cost-effective delivery, paying farmers more for better outcomes. Contracts would focus on agri-ecological approaches to farming, working with nature rather than against it, delivering a legally binding duty to restore ecosystems and biodiversity across Wales. Conservation covenants might be used to secure and protect the long-term value of the investments made.
5. We supported the proposals to fund farmers for 'additionality' as this will ensure we are no longer doing the bare minimum to restore biodiversity. A basic level of compliance across all areas must be required to receive payment for a public good.
6. It is important to note that it is possible to achieve multiple outcomes from the consultation list with individual interventions. For example, the well-known example of water companies paying upland farmers to restore upland habitats has the multiple benefits of restoring biodiversity, sequestering carbon from the atmosphere, providing clean water downstream, reducing flooding risk, and reducing soil erosion. The ambition must always be to achieve as many public benefit outcomes from each intervention as possible.
7. Examples of farming systems that CIEEM proposes could secure the highest payments would include:
 - a) high nature value farming over large areas;
 - b) extensification areas – potentially some form of managed 'rewilding' in appropriate locations;
 - c) areas with high landscape and environmental diversity;
 - d) areas focusing on the function of habitats such as wetlands, helping society to be more resilient to the impacts of extreme weather events;
 - e) areas providing clean water;
 - f) areas where chemical inputs are significantly reduced;
 - g) diverse cropping regimes that build habitats for farmland birds, bees and other pollinators, and diverse flora;
 - h) broadleaved woodlands at scale, that add biodiversity and aesthetic value and lock up carbon;
 - i) seasonally inundated floodplain grasslands;
 - j) coastal and floodplain grazing marsh and saltmarsh;
 - k) wet woodland, fen, lowland raised bog, reedbed, blanket bog; and
 - l) upland farms which restore peatland to safeguard historic carbon and facilitate sequestration of new carbon.
8. We advised caution in reference to tourism under the proposed 'heritage and recreation' public good. Welsh Government should ensure that the breadth of what this means is fully explored and potential impacts on biodiversity are taken into account. For example, possible impacts of dogs during the nesting bird season.

9. The principles of sustainable management of natural resources⁵ outlined in the Environment (Wales) Act 2016 can be applied in the development of the scheme. These would ensure public goods are delivered at the correct scale, over the long term and are based on evidence.
10. As mentioned previously, Area Statements, which NRW are legally required to produce as a result of the Environment (Wales) Act 2016, can be used to prioritise ecosystem service for each area.
11. The biodiversity/public goods value of Glastir has been limited, its inflexibility has reduced its biodiversity gain. For any new scheme to make a positive impact on the Environment Act's target to "maintain and enhance biodiversity" in Wales, there is an urgent need to provide an adequate source of qualified and competent advisors to work with the agricultural sector.
12. CIEEM would be happy to further discuss training and competency for agri-environment advisors, or any topics raised above.

⁵ Environment (Wales) Act 2016, Part 1: Sustainable Management of Natural Resources.