

Summary of WEL recommendations

1. The Welsh Government's proposed public goods scheme should reward activity beyond legal requirements and contain biodiversity objectives that focus on:
 - restoring priority species and habitats, and more habitat everywhere
 - tackling pollution
 - climate change mitigation and adaptation
 - targeted action at a landscape scale
2. The scheme should be fully integrated with and help to deliver existing Welsh Government legislation and policy, in particular the Nature Recovery Action Plan (NRAP) and the Sustainable Management of Natural Resources (SMNR), but wider Government action is needed.
3. The scheme should be robustly monitored, with biodiversity outcomes to be measured over time and to include monitoring of rare and vulnerable species.
4. The Welsh Government's Nature Recovery Action Plan needs to be more ambitious, with SMART objectives, and should include actions for marine biodiversity.

Q1. How could the Welsh Government's proposed public goods scheme, set out in Brexit and Our Land, be applied to restore biodiversity

1. Wales Environment Link (WEL) welcomes the Welsh Government's proposed change of direction for land use and management in Wales, with the clear indication that future payments will need to be focused on the payment of public money for the delivery and care of public goods.
2. We welcome the recognition by the Welsh Government that the Common Agricultural Policy (CAP) has not delivered a sustainable future for Welsh land or land managers, and the ambition to break the link between the levels of public subsidies a farm business receives and the level of commodity production achieved, and / or the size of that business. As we face catastrophic loss in biodiversity and environmental degradation (as demonstrated in the State of Natural Resources Report¹ and recognised by the Committee) continuing with the current status quo is not an option.
3. We strongly support the introduction of a public goods scheme that promotes biodiversity protection and enhancement, protects our soils and air quality, abides by the Water Framework

¹ Natural Resources Wales. (2016). State of Natural Resources Report. Chapter Three. Accessed from: <https://naturalresources.wales/media/679417/chapter-3-state-and-trends-final-for-publication.pdf>

Directive (WFD)², Bathing Water Directive and Marine Strategy Framework Directive³ and addresses climate change mitigation and adaptation. All of these aspects are important for healthy, thriving, connected ecosystems and biodiversity.

4. Biodiversity underpins our ecosystem services and the functioning of the environment, as well as being essential for our emotional well-being and providing a range of utilitarian benefits (ecosystem services). Yet the 2016 State of Nature report highlighted that nature remains under increasing pressure across Wales. Work to inform the report also identified that intensive agriculture has been, and remains, the biggest driver of biodiversity decline across the UK: agriculture occupies 70% of UK land and 85% of Welsh land⁴.
5. Declines in pollinators in recent decades have been dramatic, and are already known to be affecting the health of ecosystem services. The repercussions of continued declines in key groups of pollinators for agriculture and the health of our environment would be profound. Declines in farmland birds are also a particular concern, as shown in the RSPB's State of Birds in Wales 2018 report⁵, as is the increasing fragmentation of our native woodlands. Rural pollution, such as sediment and nutrients from agriculture practices affects rivers and bathing waters in Wales and both macro and ^{6 7 8}micro plastics from diffuse pollution often end up on Welsh beaches. The health of Wales' marine environment is, therefore, clearly linked to agricultural activities, necessitating a truly ecosystem-based approach to the design and implementation of biodiversity measures, from catchments to the Welsh offshore area median line.
6. Previous Public Goods type schemes (e.g. Tir Gofal and Glastir) designed to benefit biodiversity have met with varying success and have largely failed to maintain and/or restore priority species. There are many reasons for this, including scheme popularity, the overly prescriptive nature of interventions and inadequate provision of advice and guidance. To address these failings, we believe future initiatives must be more inclusive of farmers and land managers and, where appropriate, adopt a more flexible approach to decision making and delivery, based on results and outcomes at the appropriate scale. For biodiversity, the appropriate scale includes being large enough to provide the full ecological requirements to support viable populations of target species, which is typically landscape scale, especially for highly mobile species. Ongoing and appropriate advice and guidance will be essential in securing successful outcomes.
7. The Welsh Government must take account of the last three decades of experience, including independent recommendations to improve scheme design and delivery⁹ so that it can develop a public goods scheme, supported by an effective regulatory baseline, which proves popular

² Currently, only 37% of Wales water bodies under the WFD are in good or better ecological status, with a poor ambition to increase this to 42% of water bodies at good status by 2021.

³ The WFD's coastal water bodies physically overlap with parts of the MSFD's marine waters.

⁴ National Assembly for Wales. (2018). [Research Briefing: The farming sector in Wales](#).

⁵ Bladwell S, Noble DG, Taylor R, Cryer J, Galliford H, Hayhow DB, Kirby W, Smith D, Vanstone A, Wotton SR (2018) The state of birds in Wales 2018. The RSPB, BTO, NRW and WOS. RSPB Cymru, Cardiff.

⁶ [Luca Nizzetto](#)^{***}, [Martyn Futter](#)[§], and [Sindre Langaas](#) (2018) Are Agricultural Soils Dumps for Microplastics of Urban Origin? *Environ. Sci. Technol.*, 2016, 50 (20), pp 10777–10779

⁷ <https://ieep.eu/uploads/articles/attachments/3a12ecc3-7d09-4e41-b67c-b8350b5ae619/Plastic%20pollution%20in%20soil.pdf?v=63695425214>

⁸ De Souza Machado, A., Kloas, W. et al. 2018. Microplastics as an emerging threat to terrestrial ecosystems. *Global Change Biology*, 24 (4): 1405-1416

⁹ WAO & Glastir Evaluation

with farmers and other land managers. This should result in the appropriate management of habitats and be an effective means of aiding the recovery of priority species.

8. To achieve these aims we propose that a future public goods scheme, designed to restore and maintain biodiversity, will require the following elements:
 - **A robust regulatory baseline.** To ensure that payments for public goods secure value for money by being made on a foundation of effective regulation, with a particular focus on the continued application of the polluter pays principle.
 - **Widely available land management payments.** Available to all farmers and land managers to address challenges such as declining farmland wildlife, degraded soils and climate change, amongst others. Given lessons from previous 'broad and shallow' schemes, securing value for money should be a particular focus and payments should only be made for activities that go beyond legal requirements. For biodiversity, this would include payments for (a) existing good habitat management essential for restoring and maintaining wildlife populations and/or (b) appropriate (new) management for the same reasons.
 - **Payments for more targeted and complex interventions in targeted landscapes.** Restoring and creating habitats including woodland, recovering priority species and improving the condition of designated sites, will necessarily require more intensive, targeted effort (often at scale).
9. As we leave CAP and are able to create an entirely new support system **we particularly advocate for a system that supports field officer facilitation** in a range of situations. These should include facilitating targeted larger scale multi-site and multi-objective planning of new woodland and site tailored agroforestry options, including a good hedgerow scheme. Local facilitators should have significant influence on directing and assigning funding. We need a simplified, robust and informative process, unlike existing agri-environment schemes with their inflexible options and criteria and complex application processes.
10. To help frame this and target resources and investment, local nature recovery maps, which show ecosystem service opportunities, can be used in combination with more advanced tools, and primary and secondary data. **The government must include targets and milestones** and design the public goods scheme to deliver these. WEL has long advocated the introduction of biodiversity targets and we are currently undertaking more detailed work on what these targets should look like. The public goods scheme should reward delivery towards achieving a set of robust biodiversity targets.
11. To be effective **a future public goods scheme must be adequately funded to meet objectives.** RSPB, National Trust and the Wildlife Trusts have already established that Wales will require a minimum of £210 million per annum to enable Welsh Government to meet biodiversity and wider environmental commitments¹⁰. Much of this would be paid to farmers and other land managers in return for appropriate land management. WEL believes farmers should be able to access the Public Goods and Economic Resilience Schemes, and that the two schemes should combine to help farmers maximise the biodiversity value of their land and produce food (and other commodities) as efficiently as possible.

¹⁰ (2017), Matt Rayment. Assessing the costs of Environmental Land Management in the UK.

Q2. How could the various existing Welsh Government policies and legislation for biodiversity restoration be applied in the design and implementation of the proposed public goods scheme

12. The Welsh Government is committed to halting and reversing the decline of biodiversity as part of the UK, as signatory to the International Convention on Biological Diversity. This is also outlined in key Welsh Government policy such as the Natural Resources Policy (NRP) and the Nature Recovery Action Plan (NRAP)¹¹.
13. The new principles and scheme framework for future land management has enormous potential as a key mechanism¹² to make progress towards achieving the Government commitment to halt and reverse biodiversity decline and ensure the status of this essential ‘public good’ is improved. It should be developed so it can make a substantial contribution to statutory Nature Recovery objectives as set out in the NRAP (specifically objectives 2, 3, 4 and 5¹³) and towards achieving the SMNR (SMNR) by enhancing the resilience of ecosystems of which the status of biodiversity is an underpinning factor¹⁴. This means ensuring resources and outcomes direct land managers towards taking positive action for the recovery of Wales’ biodiversity.
14. There are two specific areas where a future land management scheme needs to ensure Welsh Government, NRW, public authorities and a range of other stakeholders can work proactively together to achieve the objectives in the Nature Recovery Action Plan. Land managers need to be given the financial support, skills, advice and direction to help them appropriately manage habitats and provide for species’ needs with the aim of:
 - improving the condition of biological protected site¹⁵ features which are on or adjacent to their land, and
 - improving the population and range status of section 7 species and habitats across Wales, outside of protected areas.
15. NRW identifies the significant potential of the future land management scheme to deliver the necessary action on the ground to help improve condition of our species and habitats, and goes as far as setting itself an organisational goal in its biodiversity strategy, to – *“Encourage the development of a funding framework for agriculture and forestry post-EU exit that has at its core the maintenance and enhancement of biodiversity and ecosystem resilience, and provide support and expert advice to the Welsh Government to enable that to happen.”*¹⁶

¹¹ Welsh Government (2015) The Nature Recovery Plan for Wales. <http://gov.wales/docs/desh/publications/160225-nature-recovery-plan-part-1-en.pdf>; Welsh Government (2017) Natural Resources Policy, pp.10.

<https://gov.wales/docs/desh/publications/170821-natural-resources-policy-en.PDF>

¹² Evidence in the NRW (2016) N2K LIFE Programme report shows how important grazing and other agri related management action is for SPA and SACs. Actions (in the PIPs) are all designed to “making significant progress towards favourable conservation status for Summary report, pp.10-13 - https://cdn.naturalresources.wales/media/674546/nrw28788-life-natura-2000-report-december-2016-update_english_spreads.pdf?mode=pad&rnd=130970726370000000

¹³ I.e. future land management must directly help to achieve Objective 2 – Safeguard species and habitats of principle importance; Objective 3 – Increase the resilience of the natural environment by restoring degraded habitats and habitat creation; Objective 4 – Tackle key pressures on species and habitats; Objective 5 – Improve our evidence, understanding and monitoring.

¹⁴ Sanderson Bellamy, A. (2018) ‘The relationship between biodiversity and ecosystem resilience’, in Sanderson Bellamy, A. and Galliford, H.J. (eds), Biodiversity and the area-based approach in Wales. How can the sustainable management of natural resources (SMNR) framework deliver nature recovery? (Cardiff, UK: Cardiff University and the Royal Society for the Protection of Birds), pp. 68–84. <http://bit.ly/SPRIareastatements>

¹⁵ Species and habitat features of nationally and internationally important sites - SSSI, SPA, SAC and Ramsar sites in particular.

¹⁶ NRW (2018) Vital Nature. Making the connections between biodiversity and the people and places of Wales

16. In addition, NRW has a key role in facilitating biodiversity recovery through a landscape scale approach – i.e. development of Area Statements to implement the priorities in the Natural Resources Policy. The NRP identifies the scale and challenge of addressing biodiversity loss and how important it is to “build on our network of protected sites”¹⁷ to maintain and enhance ecosystem resilience and achieve SMNR. This work should include mapping of ecological networks in both the marine and terrestrial environments, and work to enhance the condition and coherence of Wales’ network of protected sites, as key measures.
17. Land management schemes have the potential to bring together public, private and third sector bodies and individuals to work on common aims to maintain and enhance habitat and species condition. WEL is calling for the public goods scheme to make spatial targeted interventions to restore and enhance the resilience of ecosystems and the services they provide in line with the SMNR requirements of the Environment (Wales) Act – including, but not limited to, increasing biodiversity; reducing carbon emissions; increasing ecosystems’ resilience to climate change and improving air and water quality.
18. The effectiveness of land management actions is enhanced where it is informed by on-farm advice. This advice should refer to Environment Network Plans and Area Statements to ensure connectivity and ecosystem resilience. To successfully deliver an ambitious land management policy for the environment, guidance will be necessary to convert research into restoration of the natural environment into workable policy. Managing land for wildlife can be complicated, and land managers who have access to expertise do better than those who do not^{18 19}. The government needs to recognise the importance of this specialist advice in caring for the environment in a future policy. There is an opportunity for the Welsh Government to outsource some of the advisory elements to environmental non-government organisations (NGOs) working to the framework and objectives of the scheme.

Nature Recovery Action Plan

19. The Welsh Government’s Nature Recovery Action Plan (NRAP) is a critical vehicle for restoring biodiversity and wider natural processes through cross-government activities. As such, its objectives should be one of the drivers for designing measures in the public goods scheme. However, as it stands currently, the NRAP is neither ambitious nor focused enough on implementation to have a real impact and ensure the recovery of Wales’ marine and terrestrial environments. As it currently stands, the Welsh Government has chosen to separate out ‘marine’ from terrestrial biodiversity within Part 2, the Action Plan, creating two separate action plans. Such disconnected working practices and ethos do not demonstrate an ecosystems-based

NRW’s strategic steer for biodiversity to 2022, pp.16. <https://cdn.naturalresources.wales/media/686482/vital-nature-final-230718-english.pdf?mode=pad&rnd=131792283550000000>

¹⁷ Welsh Government (2017) Natural Resources Policy, pp.10. <https://gov.wales/docs/desh/publications/170821-natural-resources-policy-en.PDF>

¹⁸ Department for Environment, Food & Rural Affairs. (2013). Review of Environmental Advice, Incentives and Partnership Approaches for the Farming Sector in England.

¹⁹ Boatman, N., Short, C., Elliot, J., Cao, Y., Gaskell, P., Hallam, C., Laybourn, R., Breyer, J. & Jones, N. (2015). Agreement scale monitoring of Environmental Stewardship 2013-4: assessing the impact of advice and support on the environmental outcomes of HLS agreements.

approach to SMNR. These concerns continue to be raised with officials, as such an approach reinforces historic, siloed ways of working on the natural environment.

20. Whilst disappointed and concerned at the lack of integration in the marine and terrestrial plans, we are pleased that the Welsh Government has recognised that the Plan needs to be more ambitious. It is currently working with stakeholders (including WEL members) to 'refresh' the Plan's actions. It is critical that this 'refresh' serves to increase the plan's ambition and deliver upon the legislative imperative of the Environment (Wales) Act 2016 to halt biodiversity loss and restore our ecosystems.
21. Our view is that this can be achieved in a number of ways. First, **it is critical that the actions it contains are SMART** (Specific; Measurable; Achievable; Relevant; and Time-bound). This currently is not the case, given that the present iteration is a list of government activity, without any evidence to demonstrate why that activity is capable of contributing to the objective to which it is aligned; how it will do so; by when; by whom; and what mitigation steps should be enacted should it not be successful. Shortly before Christmas, WEL presented a proposal to the NRAP Implementation Group to change the structure to reflect these requirements. This was agreed by the group and we look forward to developing these actions in the coming months.
22. Equally, the Plan needs to be prioritised. As the State of Nature Report highlights, Wales is one of the most nature depleted nations on Earth and we are on the verge of missing our international biodiversity commitments yet again. We all have a responsibility to reverse this decline, both for our own well-being and that of future generations. We need to do so urgently, as we are at a tipping point where recovery may no longer be possible. In response the Government needs to prioritise action so it maximises the benefits they bring. Therefore, **the Plan needs to identify where the Government can deliver the greatest benefits** and focus on their delivery.
23. **It is essential that the Plan addresses all the drivers of biodiversity decline**, as identified in Chapter 2 of the State of Natural Resources Report (SoNaRR). It also needs to have clear milestones and target outcomes against which it can measure its progress, and ultimate success or failure. Currently it is unclear how the Welsh Government sees its actions contributing to specific international commitments (such as Aichi targets). This could be improved by mapping international commitments onto the Plan, and using this process to identify whether any gaps exist which jeopardise the Plan's capacity to deliver upon the WFG and Environment Acts. If such gaps exist, the Plan should be ambitious enough to develop new targets in order to faithfully enact Wales' bespoke legislation.
24. It is our view that having an NRAP which is robust and effective will enable the public goods scheme to be more successful and better integrated. It will better enable the Welsh Government to identify actions it can deliver across all its departments, and those of other organisations it can support. If the 'refresh' process is successful and embraces the points made above, it could also serve as a best practice example to support the design and implementation of the proposed public goods scheme. We therefore encourage Assembly Members to scrutinise the final, refreshed version of the NRAP.

The Woodland Strategy

25. The Welsh Government's Woodland Strategy contains many good aspirations and gives a clear indication of the direction of travel sought, for example, that all Plantations on Ancient Woodland Sites on the Welsh Government Estate are prioritised for restoration. We suggest that achieving these objectives requires commitment to targeted delivery plans, both within the Woodland Strategy and NRAP.
26. We support the commitment in the Woodland Strategy, and previous recommendations by CCERA, that the public forest estate should continue to be managed to the independently audited UK Woodland Assurance Scheme (UKWAS), and that further adoption of this standard by the private sector should be encouraged. An alternative to the UK Forest Standard (UKFS), which we believe to be inadequate, could be to make UKWAS certification a necessary condition of funding under the public goods scheme.

The Welsh Government's Forest Estate

27. The Welsh Government and NRW have a considerable opportunity and responsibility to manage their own land to reverse biodiversity decline. The intention to do this is set out in many policy statements including the Woodlands for Wales Strategy. We think a much higher priority must be given to the practical delivery of good intentions, including the commitment to substantive delivery targets. Areas where particular focus is needed to meet published commitments to address biodiversity loss include:
 - Delivery of the commitment to restore PAWS and improve the condition of priority native woodland and open habitats on the Welsh Government woodland estate.
 - Meet the commitment to ensure that woodlands on the estate play their full role in improving environmental quality, particularly water and soil resources, at a local and catchment level in Wales.
 - Meet the commitment to restore priority open habitats such as deep peat on the estate.
 - Address the deficiencies exposed by the UKWAS certification audits of the estate.
 - Provide reports demonstrating timely and significant progress in these areas.

What lessons can be learned from the Glastir Monitoring and Evaluation Programme (GMEP) to ensure effective monitoring and evaluation of schemes to support the restoration of biodiversity. How should the new Environment and Rural Affairs Monitoring and Modelling Programme (ERAMMP) be designed and implemented effectively for this purpose?

27. We welcome an evidence-based approach to public goods to facilitate transparency and confidence in interventions. We would like to highlight the complexities involved in developing a robust methodology to determine output values and would strongly advise collaboration with academic, private sector and environmental stakeholders to develop this as soon as possible. The State of Natural Resources Report will be an ongoing source of important monitoring information, so it is important for this report to be developed so that it is a useful resource.
28. The consultation on Brexit and Our Land did not suggest any targets for the proposed environmental outcomes or public goods. Without targets, associated milestones and timeframes, it will not be possible to know how we are performing, where we can improve, or

where to target funding. Therefore, the Welsh Government must include targets and milestones, including biodiversity targets, and design the scheme to deliver these. Using existing data and tools can help frame numeric targets to ensure that resources and effort is targeted to the best effect.

29. The new Environment and Rural Affairs Monitoring and Modelling Programme (ERAMMP), is being implemented as a successor to the Glastir Monitoring and Evaluation Programme (GMEP). However, earlier Welsh agri-environment schemes (AES) were also the subject of monitoring programmes between 2009 and 2012, with separate components focusing on ecosystem services, habitats and species. The results of species monitoring have recently been accepted as a peer-reviewed article in the Journal of Applied Ecology.
30. The approach taken by GMEP towards species monitoring differed from earlier monitoring in two key respects. Firstly, it employed a re-surveying strategy, allowing for changes over time to be detected, and enabling the effects of AES management to be more confidently attributed. We are very much in favour of this. Secondly, it did not target dedicated field work to species of conservation concern; rather, it developed indices of taxonomic groups, and reported habitat quality. This latter approach is correct when carrying out a national monitoring programme, as scarce species are more difficult to detect unless sampling design is sufficiently sophisticated and intensive.
31. Nevertheless, we strongly recommend that ERAMMP takes account of scarce species. The ecological needs of some species are imperfectly known, and effects other than habitat quality (for example, predation pressure) may mean that measures of habitat quality may not accurately reflect the impact of AES on the species they are intended to benefit. Planning and carrying out a species-focused monitoring programme in Wales has been possible in the past, and should form part of ERAMMP. This would be additional to the existing survey methods used by GMEP: considering the amounts paid in agricultural subsidies, a small fraction of these resources for effective monitoring should be considered an investment rather than a cost.
32. There can be two different purposes to monitoring, one being to track the status of biodiversity in general, and the other to ascertain whether public goods scheme interventions are achieving the objectives set for them. There is a danger that focusing on the latter can create a situation in which scheme interventions are judged to be successful in their own narrow terms (e.g x km of new hedge established) but fail to achieve the wider purpose of stopping biodiversity decline.
33. Monitoring that focuses on demonstrating recovery on individual sites whilst on-going decline continues at national level reflects a failure in policy. This is a problem of either unclear objectives (or wrong objectives) or post-rationalising monitoring outcomes.

Wales Environment Link (WEL) is a network of environmental, countryside and heritage Non-Governmental Organisations in Wales, most of whom have an all-Wales remit. WEL is a respected intermediary body connecting the government and the environmental NGO sector in Wales. Our vision is a healthy, sustainably managed environment and countryside with safeguarded heritage in which the people of Wales and future generations can prosper.

This paper represents the consensus view of a group of WEL members working in this specialist area. Members may also produce information individually in order to raise more detailed issues that are important to their particular organisation.



Baltic House, Mount Stuart Square Cardiff, CF10 5FH
 Tŷ Baltic, Sgwâr Mount Stuart, Caerdydd, CF10 5FH

Tel: 02920 497 509

www.waleslink.org

Registered Charity Number / Rhif Elusen Gofrestredig: 1022675

Chair / Cadeirydd: Roger Thomas

Joint Directors / Cyd-Gyfarwyddwyr: Susan Evans & Karen Whitfield