

Y Pwyllgor Newid Hinsawdd, Amgylchedd a Materion Gwledig | Climate Change,
Environment and Rural Affairs Committee

Ymchwiliad Bioamrywiaeth | Biodiversity Inquiry

Ymateb gan : Parciau Cenedlaethol Cymru

Evidence from : National Parks Wales

1. Brecon Beacons, Pembrokeshire Coast and Snowdonia National Parks cover 20% of Wales. Wales' five Areas of Outstanding Natural Beauty cover a further 5%.
2. The three national park authorities, working in partnership as National Parks Wales (NPW), welcome the opportunity to contribute to the Climate Change, Environment and Rural Affairs Committee's inquiry on biodiversity restoration in the context of the proposed Public Goods Scheme.
3. The Committee's inquiry overview sets out the context of biodiversity decline. We note that the State of Natural Resources Report 2016 identifies that the root causes of biodiversity decline are embedded in social and economic systems, and suggests that partners should consider integrated place-based solutions that maximise contribution across Wales' well-being goals.
4. Welsh Government's post-Brexit support structure provides a unique opportunity to contribute to these solutions, by providing land managers with the right incentives and tools to restore a landscape rich in nature and to ensure that future generations experience a Wales richer in wildlife than it is today.
5. The majority of NPW's comments derive from the authorities' experiences in running conservation land management programmes complementary to national agri-environment schemes. As a general comment, NPW feels it is fundamental that Wales retains a strong land management sector which is able to undertake the work needed to provide both food and public goods and which can help tackle the challenges posed by climate change. Accordingly, NPW strongly supports the principle of a Public Goods scheme.

Q1: How could the Welsh Government's proposed Public Goods scheme, set out in Brexit and Our Land, be applied to restore biodiversity?

Ambition

6. Nature recovery in Wales will require a step change in the scale of ambition for land management change. If it is to halt and reverse the decline in biodiversity, the proposed Public Goods scheme must significantly widen participation in ecological restoration across Wales.
7. The phrase coined in the Lawton Review (Making Space for Nature, report to Defra 2010) applies: the Public Goods scheme must create "more, bigger, better, joined" habitat to buffer and increase the size of existing conservation sites and allow a landscape more permeable for wildlife to evolve.
8. NPW considers that biodiversity restoration must be considered hand in hand with:

- other public goods (including landscape, tranquility and dark night skies, air quality, soils, water resources and quality, and heritage and cultural values associated with biodiversity and the landscape)
 - aspects of well-being (e.g. the resilience of rural communities and skills and workforce issues in delivering biodiversity) and
 - wider environmental and economic risks (e.g. climate change, invasive species, pests and diseases, Brexit).
9. NPW perceives that there is a risk that differentials in funding and / or take-up between the proposed Public Goods and Economic Resilience schemes may result in the Public Goods scheme being unable to achieve the step change in biodiversity restoration that is necessary. The proposed Public Goods scheme must be resourced appropriately.
10. NPW understands the principle of an Economic Resilience scheme, however we feel it is important to learn from previous production incentive programmes and ensure that environmental, welfare and social factors are integrated into the scheme design. It will be critical to set the floor at the right level to deliver the widespread environmental improvements which are desired. This could be applied to the Economic Resilience scheme in order for it to be positive or neutral to the Public Goods scheme and in order to provide a springboard towards the Public Goods scheme.

Long term

11. The proposed Public Goods scheme will need to give land managers the assurance and confidence of long term support if biodiversity restoration is to form part of a viable long term business option. Thus the scheme should be long term - subject to adaptive review, and capable of responding to and anticipating environmental and economic change, but effectively unending.

Competitive with other land uses

12. The scheme must be available and attractive to all land managers in Wales. It is suggested that the scheme should include land in use for intensive food production, land managed explicitly for biodiversity, and everything in between. (Depending on Welsh Government's preferred options on how to allow access to tenants and common land graziers, a review of agricultural tenancy laws and common land laws may be required.)
13. Payments for biodiversity and other public goods must be competitive with alternative land uses and be able to reflect the comparative advantages of different farmland types and systems. As a general principle, more biodiversity should equate to more income. This suggests a shift from a profit-foregone to a goods-and-services provided formula – a results-based approach which is incentivised and competitive in the market place.
14. The Committee may wish to consider whether the proposed Public Goods scheme should reward historic and current conservation land management for outcomes already achieved, and if so how this might be done. (There might be potential for a differentiated 'basic payment' based on existing public goods values for example.)

15. The provision of a significant new income stream under the Public Goods scheme must be clearly understood and trusted by land managers as they prepare their businesses for change. Much of the communication of biodiversity as a public good may take place most effectively at a local level, alongside discussion of ideas for restoration of biodiversity and other public goods.

Collaborative and results-based

16. There is evidence to suggest that results-based schemes offer a number of benefits over traditional prescription-based schemes. We would like to draw the Committee's attention to the following schemes (although there are many examples from the UK, Europe and further afield):

- The Burren Farming for Conservation Programme
<http://burrenprogramme.com/impact/outputs/>
- Dartmoor Farming Futures Project (an example on common land)
<https://ecosystemsknowledge.net/sites/default/files/wp-content/uploads/2014/6/Dartmoor-Farming-Futures-Independent-Project-Evaluation.pdf>
- Results-Based Agri-Environment Payment Scheme (RBAPS) pilot study in England
<https://www.gov.uk/government/publications/results-based-agri-environment-payment-scheme-rbaps-pilot-study-in-england>

17. Results-based schemes can offer land managers greater freedom and flexibility to decide how to manage their land, opening doors to scheme managers to support land manager delivery through training, mentoring and collaboration, fostering greater levels of dialogue and understanding and ownership of scheme objectives.

18. The Burren Scheme (for example) has used a hybrid approach which combines a fixed rate payment alongside a results-based premium which can help to mitigate perceived uncertainty and risks for landowners taking part in output led schemes.

19. Results-based schemes can also foster collaboration with peers and in landscape-scale initiatives - so small high nature value farms and early adopters need not be disadvantaged if they are located in a low nature value setting.

20. Collaboration can offer better transparency and value for money. If higher levels of environmental outputs are achieved through collaboration, this can be rewarded through higher payments.

21. Results-based agreements combine to form meaningful scheme monitoring metrics in a way that compliance monitoring in prescription led schemes cannot. (We make further comment on this at question 3.)

22. The scheme (locally and as a whole) will likely need to reflect some indeterminate outcomes and might be expected or even designed to generate emergent, naturally dynamic landscapes. This has implications for determining overall scheme results, and individual agreements may need to reflect a desired direction and rate of

change - waypoints in adaptive management rather than some specific long-range destination.

Locally delivered

23. Defining public goods at the most local level possible will enable all concerned to understand how best to deliver them. In order to foster the long term relationships necessary to achieve the scale of outcomes required, we believe that there needs to be a substantial shift away from the current 'self-service' and 'contract manager' approach towards providing land managers with the opportunity to build sustainable long term relationships with locally-embedded, skilled advisors.
24. With adequate resourcing, these skilled advisors would also broker access to a wider enhanced support network (e.g. access to a pool of experts and guidance on priorities from Local Nature Partnerships). We believe this approach would help the scheme to develop a more nuanced local delivery interface, promoting innovative and creative thinking and collaboration, capitalising on ideas grown from the 'bottom up' and mitigating the pressure on the scheme to come up with all the answers.
25. NPW would welcome early discussion with Welsh Government regarding scheme delivery in National Parks. National Park authorities have considerable experience in working directly with the land management sector, running land management schemes (e.g. Tir Eryri, Pembrokeshire Grazing Network and Conserving the Park (Pembrokeshire Coast), Black Mountains Land Use Partnership), managing registered common land (e.g. Meithrin Mynydd) and working with commoners (graziers) associations. There may be scope for the authorities to help develop pilot and demonstration projects.
26. NPW believes that the designated landscapes of Wales are public goods in their own right as landscapes and as destinations that have a positive effect on local and regional economies. Designated landscape management plans are ideal vehicles to support regional and local approaches to scheme delivery, encouraging enterprise and regional distinctiveness, delivering food production, land management, nature recovery, rights of way improvement, heritage management, culture, health and visitor management for 25% of Wales, developing new models at appropriate scales in rich landscapes. Welsh Government's ambition for the designated landscapes of Wales as set out in "Valued and Resilient" identifies opportunities to develop such an approach in delivering public goods.

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?

27. The proposed Public Goods scheme would be a major and logical initiative in pursuit of Wales' well-being goals and the sustainable management of natural resources. Regionally, the scheme could complement and help in delivery of (for example) area statements, local nature recovery plans, well-being plans and protected landscape management plans.

28. We envisage that the scheme would need to operate within a regulatory sphere that encloses a sustainable 'solution space'. Scheme payments and other market forces would establish the equilibrium within that space.
29. Adequate enforcement of existing regulation (e.g., EIA (Agriculture) (Wales) Regulations 2017, Heather and Grass etc. Burning (Wales) Regulations 2008) is therefore essential to ensure that penalties act as deterrents and are not just an occasional cost of business.
30. It is suggested that it may be necessary to consider how a raised regulatory floor and / or better-resourced enforcement of it can provide a greater contribution to biodiversity delivery, so that the available finance under the proposed Public Goods scheme is required to work less hard.
31. One starting point could be to identify whether elevating existing voluntary Codes of Agricultural Good Practice to regulatory status may be appropriate. The codes cover areas where new regulation would have little or no impact on farm business and could result in cost savings (reducing overheads, enhancing soil quality, and reducing pollution risk for example), while delivering a significant and widespread benefit to biodiversity. Field boundary management is one such area.
32. Wildfire risks (including any additional risks that might be inherent in the scheme) need to be recognised and mitigated.
33. Many of Wales' most valued and iconic landscapes are threatened by a lack of grazing, which is a key means of maintaining most remaining semi-natural habitats in Wales. Local grazing schemes are essential to re-establishing and maintaining sustainable grazing regimes. NPW advocates continued support for a pan-Wales grazing organisation to facilitate and assist with the creation of local grazing schemes throughout Wales.

Q3: 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?

34. As suggested above, monitoring of results-based agreements can be combined to form a broad and meaningful scheme level monitoring metric which nests below, and tests assumptions of higher level monitoring. As an added advantage, the data can be disaggregated to a local level.
35. We also suggested that individual agreements and the scheme as a whole will need to accommodate, or indeed aim to create, emergent, functioning and naturally dynamic landscapes. The scheme's effectiveness in terms of addressing factors affecting the state of nature in Wales can nevertheless be assessed, with analysis applied to separate the impact of other variables.

36. If attributes of some past environmental state (baseline) are to be employed as indicators of a future desired state, at whatever scale, then there must be a clear rationale for the selection of that baseline. A 1990s baseline implies different outcomes to a 1970s baseline for example. Setting a realistic but challenging (i.e. earlier) baseline might provide a way of recognising and rewarding historic achievements on high nature value holdings.
37. We suggested above that the scheme should allow latitude in setting regional and local results. At the most granular level (land managers and land management advisors/project officers), monitoring can help stimulate knowledge, participation and management innovation. There is potential for land managers and members of the community to contribute to monitoring. Incidentally, this could help create a successional resource for local officers.
38. Monitoring will also need to be in place for basic measures and for the regulatory floor. Given the emphasis on public goods, there needs to be more than self-certification; a watchdog role to protect public interests and the taxpayers' investment, for example.

Thank you for the opportunity to input to this inquiry.