

Consultation on the Nature Recovery Plan in Wales

10 September 2014 - 3 December 2014

Consultation Responses 1 - 30

Ref. 0001 - North Ceredigion Bat Group

As a voluntary Bat Worker I've been trying to get to grips with the Nature Recovery Plan for Wales. I am not an ecologist but a volunteer conservationist. Although the document sets out some high ideal and ambitions, it is totally vacuous and meaningless to the majority of those (like myself from the voluntary sector) who are being asked to help implement the plan. I read one paragraph and then can not really work out what has just been said. There is lots of highfalutin terms without much content. It's totally meaningless and useless as a working document and lays out no clear lines how the 'strategies' are to be implemented. What we as volunteers are expected to take from this is totally inexplicable! There is far too much room for various interpretation. Its aim is to please the Minister and those who see the environment as as 'resource' on which a financial tag can be put. I know there is a need to 'sell the idea' to those with the money of course but the document panders to much to this and not enough on conservation for its own sake and the protection of species for their own sake. I understand the worthy (no sarcasm intended here) principle that we need to concentrate on the whole environment not just on specific sites and species because this leads to fragmentation and not joined up thinking, but how is it expected to 'continue to protect our priority sites and species' as a whole if they are not identified specifically in this document!

Ref. 0002 - Hugo Burke

- 1) We should plant ambitiously greater areas of Wales with natural woodland
- 2) We should then build into that woodland paths for Walking, Picnic, Mountain biking, Horse Riding and fuel the outdoor life.

The environment has been sculpted by man for millennia – we should continue this – but with an emphasis on encouraging family participation in the outdoor world

Ref. 0003 - Capita

1. Do you agree with the focus of the ambition on addressing the underlying resilience of our ecosystems and identifying and capturing benefits for society? If not, what else do we need to consider?

The term 'ecosystem services' is a disingenuous one in this context and needs to be clarified as 'UK ecosystem services', to exclude such invasive species as Himalayan balsam, which can be regarded as fulfilling some of these services e.g. Action Plan for Pollinators.

The current SNCO for Wales, NRW, appears to be degrading its conservation and ecological science base at a reprehensible rate. How can Wales deliver competent science-based environmental and ecological goals (part of Strategic Goal E) when in-post personnel are being demoted, made redundant or driven out by policies that favour the former Environment Agency's role, rather than the former Countryside Council's role?

2. Does the ambition statement capture this new approach fully? What might be added?

Sounds suspiciously like the 2010 target, which wasn't achieved. To be believable, the policies need to match the rhetoric.

The opening paragraph is full of ambiguous references: 'several forms of natural woodland' – which should say that there are 8 (of which fens and heathlands are not a form of woodland!); 'a multitude of wetlands... an array of wildlife.' This lack of specifics makes the document look wishy-washy and written by someone with a poor knowledge base as indicated in the previous comment.

3. Are our goals the right ones? What might be added?

2nd paragraph p. 8: 'This could be especially the case for rare species which may support unique ecosystem functions but rely on the protection and appropriate management afforded by protected sites for their continued survival. The wider countryside, in contrast, is under pressure to deliver particular services as efficiently as possible, and as such, cannot necessarily maintain this underlying diversity.' This is a scandalous cop-out statement and implies that conservation can be gathered into specified areas and the remaining c.86% of the land can be 'business as usual'. Conservation of wildlife & natural resources must be integrated into economic growth at every level and not partitioned. Protected sites are the flagship, but not the total reservoir.

The 'no net loss' target looks a weak commitment post 2010, especially as the commitment again resorts to non-specific language: 'A wide range of decisions in different sectors have an impact on our ecosystems'. The major sectors should be named: pastoral agriculture, development, energy production. The impacts should be identified: eutrophication, habitat loss. Project specific protection targets cited in line with all EU & UK biodiversity goals. Show commitment, not platitudes.

4. Are the actions proposed right and adequate?

The Focus for Action is a laudable goal.

The Review of Designated Sites and Species appears to have some teeth, reinforced by the commitment that the WG 'will if necessary, look for a future legislative opportunity further to align and focus the legislative framework to remove conflicting objectives and increase integration'. We can take some comfort from that.

The 'refresh' (p.23) states: 'identify priority species or habitat that society wishes specifically to see benefit from improvements to our ecosystems.' This implies conservation priorities are a democratic process and they are not – they are evidence-based. If it was a democratic process, people would favour the protection

of red squirrel over that of Geyer's Whorl Snail

5. What additional action would you wish to see?

The commitment should emphasise and state some sort of penalty for failing in this approach.

The 2010 target came and went. Under a toothless commitment, the 2020 target will go the same way with a metaphorical shrug of the shoulders from the Assembly.

6. How do we engage with business more effectively to deliver our ambition?

Private sector ecologists should be invited to contribute to the statutory process. Many big companies have them. There is a 'them and us' culture between Public & Private sector which is divisive and counter-productive, when basically we all strive to ensure the same vocational goal.

There should be public/private exchanges, where staff from one sector could exchange with their equivalents in the other. This is the best way to ensure we all work to a common goal and would almost certainly save money.

7. How can we strengthen the way we work together?

See previous comment

8. How can we share budgets and look at integrated outcomes?

See previous comment

9. What else should be done to avoid duplication and to deliver our goals?

See previous comment

Ref. 0005 - Anonymous

There are two ideas that I think will greatly improve Biodiversity in Wales if they were adopted.

1. Local Authorities - Grass cutting/hedge cutting is a massive destroyer of biodiversity. I have had endless talks with a particular councils parks department who are so stuck in the Victorian mind set of all grass must be cut!!

They need training in order for them to realise the damage they are causing, the sooner this no cut/common sense policy is adopted throughout Wales the sooner the general public will get used to the idea of seeing grass and hedging doing what it naturally wants to do, grow!!

Personnel experience with local grass cutters is that they are "Agency" staff who to be fair don't care what they cut. I've seen them mow down rows of daffodils and wildflowers growing the grass.

In regards to the hedge cutting although many local authorities do maintain hedges it is often farmers who do the majority of the work. Again education is the key.

Cutting hedges in September/October when the hedges are laden with fruit and berries for birds and insects to survive on throughout the winter is crazy, is there no wonder Biodiversity is struggling since agriculture became mechanized. Either cut early spring, once every 4 years or establish a scheme to promote traditional hedge laying techniques.

2. Welsh Government Show Farm - This may already exist, not sure!?

A working farm owned and run by NRW as a best practice bio diversity friendly farm showing that production doesn't have to be hugely affected by promoting sustainable ideas.

Using traditional breeds of livestock which can flourish on local native grassland without the need for continuous ploughing and sowing of modern pasture.

Using wood boundaries around fields to help capture water run off, diversifying - market garden, bee keeping etc, holistic grassland management techniques - which in turn will reduce the need for ploughing and silage/hay making which in itself is a huge contributor to bio diversity decline and high CO2 emissions. Promote renewable energy production etc.

Show farmers ways to increase bio diversity which if implemented and managed successfully will reduce CO2 output but more importantly for farmers is the reduction in fuel, feed, fertiliser bills. The agricultural sector is well known for being a large contributor to CO2 emissions

As a high percentage of Welsh farms are hill farms this would be the best type of farm to demonstrate on. Short courses should be offered at a reduced rate or if possibly free to farmers to demonstrate these techniques both in the class room and around the farm on a practical level.

Ref. 0006 - Institution of Civil Engineers Wales Cymru

1. Do you agree with the focus of the ambition on addressing the underlying resilience of our ecosystems and identifying and capturing benefits for society? If not, what else do we need to consider?

Response 1: yes

2. Does the ambition statement capture this new approach fully?

Response 2: yes

3. Are our goals the right ones?

Response 3: yes

4. Are the actions proposed right and adequate?

Response 4: yes

5. What additional action would you wish to see?

Response 5: Welsh Government sharing their best practice

6. How do we engage with business more effectively to deliver our ambition?

Response 6: Sharing real examples of how individuals and companies/organisations can improve biodiversity and using them as ambassadors.

7. How can we strengthen the way we work together?

Response 7: networks, forums, on line and face to face

8. How can we share budgets and look at integrated outcomes?

Response 8: Joint funding of projects across boundaries.

9. What else should be done to avoid duplication and to deliver our goals?

Response 9: Sharing practices

10. How can we best use the Information Hub to collate and disseminate data and evidence?

Response 10: make it user friendly and promote easy access

11. How best should we communicate progress with delivery of our ambition, for example, by a three or five year work programme or an annual delivery plan?

Response 11: an even longer term plan would be better but communication is key to success. There should also be annual delivering monitoring as well as long term goals. This may be many small incremental steps to achieve a bigger stride forward.

Ref. 0007 - Denbeigh Vaughan

In principle this is all very good and sound and admirable. Below are my concerns, questions and thoughts - they do not relate specifically to your consultation form questions as I find these difficult to answer; I have no experience of forming policy or thinking in the way that the questions seem to demand.

My chief concern is that the plan is realised in such a way that allows it to actually happen and not get hijacked by turns in the tides of politics. I don't know how or even if this is possible but I would like to see mechanisms and structures that keep politicians and their short-term motivations out of it - this sort of thing is by default a very long term approach which the current political system and general public

attitudes do not encourage. And biodiversity is not a priority for most people at the best of times.

Will the approach capture benefits for species and environments when these do not benefit society as it sees as appropriate or 'as value for money'? Currently, ancient woodland is not immune from development despite its rarity and the impossibility of biodiversity offsetting for this habitat (HS2).

Planning policy and regulations are key to the functioning of the Plan - will they be adequately supported in a time of shrinking budgets? Our councils must not go the way of the English where many have no ecologists. These positions should be a key pin in implementing the plan on the local level, and in terms of getting things done. For example, effecting the proper management of activities such as hedge and verge management to maximise benefit to species. Also, making sure relevant planning policy is properly implemented.

Forums of local county ecologists, NRW regional staff, land managers (conservationists, farmers, developers), professional ecologists - to work out the practical issues in order to make things work on the ground - Policy from on high will not work well in the rural social environment (nor any other, probably).

The farming sector is the essential sector to get on board. Agri-environmental schemes that are sensible, simple, fair and accessible and available to all-comers. And an implementation/support staff that is adequate, qualified, and experienced. Farmers should be involved in putting together these schemes. My experience suggests that this has not happened.

Ref. 0008 - Betty Lee

Surely more specific measures need to be implemented in order for this plan to work?

I would like to see:

1 – Protect what is working well for biodiversity.

What is already working well should be appreciated and supported. For example the splendid work being done in North Wales by their Ecologists and Biodiversity Officers coupled with that of COFNOD, the recording centre, is something to be proud of. But far from encouraging the essential business of recording our wildlife, COFNOD is suffering from cutbacks! Of course money is tight but it is unrealistic to make optimistic claims about biodiversity when the reality is unattainable through lack of funding. Money is available so where does 'nature recovery' stand in the order of priority?

The RSPB (their work is not just for birds), the Wildlife Trust and other NGOs who do such good work should have support particularly when rail and road linkages with their reserves and the wider countryside can be enhanced as wildlife corridors. Hopefully the amalgamation of CCW, the Environment Agency and the Forestry Commission, into Natural Resources Wales, should have made it easier to work together on landscape scale projects. Money must have been saved by this joining

up and be available to make the recovery plan a realistic plan? However this change has sidelined conservation making liaison more difficult. There is obviously no political will, this plan being cynical exercise!

2 – Improve on current grant aided schemes to encourage landowners to participate in landscape scale projects.

There were schemes like the Tir Canol one which, in theory, was simple and could have been very effective. Like the Better Woods for Wales such schemes suffer from far too much office work and too little field work. Continuous changes are wasteful, diverting resources from the chance to improve existing projects into wasteful bureaucratic exercises.

Agricultural subsidies often have extremely damaging consequences to wildlife while grants given to farmers to mitigate such harm are inadequate. Without addressing this the plan is doomed to failure!

3 – Controversial grants to shooting estates might be more acceptable to the public if shoots were licensed. Native birds and animals ‘controlled’ so that artificially raised, alien species can be shot does not help biodiversity. Even grouse moors have a dubious reputation with regard to hen harrier slaughter. Is it right that anyone can start a shoot without a licence? No licence equals no control. Ask hen harriers about self regulation.

4. Something most people know but politicians never mention is that the burden of our over population needs to be addressed if sustainable and diverse life is to continue. Too big a problem to consider?

Nothing in the plan as it stands delivers real opportunities to maintain, much less improve, the poor state of Britain’s fauna and flora.

Ref. 0010 - John Goodwin

I am disappointed that the proposed Nature Recovery Plan contains so little by way of specific action to aid the recovery of our natural environment and biodiversity. I fully support the RSPB position regarding the Recovery Plan. Specifically:

We need a fully funded plan of action that meets nature’s needs. The Welsh Government seems to think that our wildlife will recover through adopting the Natural Resource Management approach alone. The integration of policies and plans to change the way people work across the environment in Wales may go some way to help, but on its own it is not enough. We must have a fully funded plan of action on the ground to restore our most precious and threatened wildlife, and create space for nature in our network of special sites, and across our wider countryside and seas. Monitoring measures must be included so we can see whether we’re meeting nature’s needs.

Improving our network of special places and most threatened and precious wildlife is essential. We need Welsh Government to invest in restoring our special sites and priority species and habitats. Our sites must be bigger, better and more connected and our threatened and precious wildlife restored. Commitment to improving these crucial nature conservation tools in the Nature Recovery Plan is essential.

Investment in scientific evidence is essential. We need to be able to see what's working and what's not – monitoring the condition of sites and trends for a full range of species and habitats is essential. This helps us see nature's needs and ensures we're using the right tools for the job. We can't restore the nature we've lost if we can't see what we're doing.

Welsh Government must show strong leadership and ambition by making it law to achieve nature's recovery. We need the Environment (Wales) Bill to enshrine in law long-term legally binding targets that promise to reverse declines in nature. We need the law to also declare it a duty of all public bodies "to further the conservation and enhancement of biodiversity" in their activities.

I hope that we will see a development of the proposed Nature Recovery Plan to incorporate these points.

Ref. 0011 - John Roach

Whilst I am pleased that the Natural Resources Minister, Carl Sargeant, and his Welsh Government officials are developing a Nature Recovery Plan as part of a new Environment (Wales) Bill I am concerned that, apparently, the Nature Recovery Plan doesn't say much about how we're going to achieve nature's recovery. It seems that this bill is similar to the Active Transport Bill in that it is lacking in strong leadership from Government. For the Nature Recovery Plan to be effective:

We need a fully funded plan of action that meets nature's needs. Welsh Government thinks our wildlife will recover because a new approach called "Natural Resource Management" will integrate policies and plans to change the way people work across the environment in Wales. This process may go some way to help, but on its own it is not enough.

Improving our network of special places and most threatened and precious wildlife is essential. We need Welsh Government to invest in restoring our special sites and priority species and habitats. Our sites must be bigger, better and more connected and our threatened and precious wildlife restored. Commitment to improving these crucial nature conservation tools in the Nature Recovery Plan is essential.

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Welsh Government must show strong leadership and ambition by making it law to achieve nature's recovery. We need the Environment (Wales) Bill to enshrine in law long-term legally binding targets that promise to reverse declines in nature. We need the law to also declare it a duty of all public bodies "to further the conservation and enhancement of biodiversity" in their activities. This will give nature recovery the power it needs to succeed.

Ref. 0012 - Annie Halliwell

I thoroughly agree with the RSPB in all their efforts to safe guard our birds and

environment. We must not lose sight of what is important and which cannot be replaced once we have lost it

Ref. 0014 - Sally Hall

Dear Sir or Madam, it was clear from the 2013 State of Nature report that we are failing to help protect and sustain the natural environment. As someone who regularly monitors wildlife (birds, moths/ butterflies, mammals and plants) over the last 20 years I have seen significant declines in many species, even those that were once classed as 'common'. I am concerned that once again the proposals put forward do little to actually help reverse the current trends.

If you really want to see a sustained improvement then practical action is necessary - protection of habitats, more areas set aside for 'nature', linked by appropriate corridors so species can move around in safety, incentives, and if applicable, education, for those with suitable land so they are encouraged to create and maintain suitable habitats and protect declining species. Once a species declines it is a long and hard job to ensure its recovery before it is too late.

Ref: 0015 - Ian Palmer

Dear Minister,

I am very concerned to see that although you and your department are developing a Nature Recovery Plan and new legislation, the Environment (Wales) Bill, the Nature Recovery Plan doesn't say much about how we're going to achieve the recovery of nature that you apparently seek.

Sadly, there is very little action included in the plan. It contains many good words, but it doesn't show the commitment to action or access to funding that will make the difference nature needs. Without these concrete commitments and targets, the aims of the Bill will be so much wishful thinking.

For effective results, strong leadership from Government is required. The RSPB have set out a structured way forward which I quote below:

- We need a fully funded plan of action that meets nature's needs. Welsh Government thinks our wildlife will recover because a new approach called "Natural Resource Management" will integrate policies and plans to change the way people work across the environment in Wales. This process may go some way to help, but on its own it is not enough.
- Improving our network of special places and most threatened and precious wildlife is essential. We need Welsh Government to invest in restoring our special sites and priority species and habitats. Our sites must be bigger, better and more connected and our threatened and precious wildlife restored. Commitment to improving these crucial nature conservation tools in the Nature Recovery Plan is essential.

- Investment in scientific evidence is essential. We need to be able to see what's working and what's not – monitoring the condition of sites and trends for a full range of species and habitats is essential. This helps us see nature's needs and ensures we're using the right tools for the job. We can't restore the nature we've lost if we can't see what we're doing.
- Welsh Government must show strong leadership and ambition by making it law to achieve nature's recovery. We need the Environment (Wales) Bill to enshrine in law long-term legally binding targets that promise to reverse declines in nature. We need the law to also declare it a duty of all public bodies "to further the conservation and enhancement of biodiversity" in their activities. This will give nature recovery the power it needs to succeed.

I ask therefore, that you and your department take on board these proposals and make the most of the opportunity that the Environment (Wales) Bill now provides. With strong leadership, this can be a historic step in the development of Nature's recovery in Wales and provide a major stepping stone for the future improvement of the natural environment in Wales. What better legacy for the Minister for Natural Resources to bequeath his country? I firmly hope that you will seize this opportunity with both hands.

Ref: 0016 - Dick Finch

Nature Recovery Plan: It seems this must be a well-funded strategy to restore threatened wildlife and special sites, with strict scientifically-based monitoring.

Environment (Wales) Bill: Should have long-term legally-backed targets, and should force public bodies to further the conservation and enhancement of biodiversity.

Ref: 0017 - Louise Carragan

Please see below for my comments relating to the public consultation on the Environment (Wales) Bill.

As a wildlife volunteer and a person who cares deeply about the environment I am observing on a daily basis the persistent and continual loss of vital wildlife habitat. As a result, habitats are also becoming more and more isolated creating island populations that will, over time, become extinct as a result of their isolation regardless of how good that small area of habitat is.

- We need a bigger commitment to prevent loss of habitat. Only too often housing or commercial development is given priority over wildlife habitat. Even brownfield sites are a valuable wildlife habitat for reptiles, plants and rare bumblebees for example.
- We need a fully funded plan of action that meets nature's needs. Welsh Government thinks our wildlife will recover because a new approach called "Natural Resource Management" will integrate policies and plans to change the way people work across the environment in Wales. This process may go some way to help, but on its own it is not enough. There should be a serious commitment to creating a clearly defined plan of action together with details of how this is to be funded.

- Improving our network of special places and most threatened and precious wildlife is essential. We need Welsh Government to invest in restoring our special sites and priority species and habitats. Our sites must be bigger, better and more connected and our threatened and precious wildlife restored. Commitment to improving these crucial nature conservation tools in the Nature Recovery Plan is essential.
- Investment in scientific evidence is essential. We need to be able to see what's working and what's not – monitoring the condition of sites and trends for a full range of species and habitats is essential. This helps us see nature's needs and ensures we're using the right tools for the job. We can't restore the nature we've lost if we can't see what we're doing.
- Welsh Government must show strong leadership and ambition by making it law to achieve nature's recovery. We need the Environment (Wales) Bill to enshrine in law long-term legally binding targets that promise to reverse declines in nature. We need the law to also declare it a duty of all public bodies "to further the conservation and enhancement of biodiversity" in their activities. This will give nature recovery the power it needs to succeed.

Ref: 0018 - Verity Picken

Dear Mr Sargeant

I note that you are developing a Nature Recovery Plan and proposing new legislation – the Environment (Wales) Bill.

I write now to request that you make absolutely sure that the Plan includes a fully funded plan of action specifying the restoration and conservation of Wales' wildlife and their habitats. Wildlife sites should be of an adequate size and, most importantly, connected to other sites. Monitoring these actions is essential so should also be funded.

It is vital that the Environment (Wales) Bill sets long-term legally-binding targets for the recovery of nature – it should be a duty, enshrined in law, for all public bodies to conserve biodiversity.

You have the power to make this happen and save our countryside and our wonderful wildlife for future generations – please make sure your Plan and Bill results in action on the ground.

Ref: 0019 - Ceri Thomas

Annwyl Sir neu Madam,

I grew up in rural north Wales, with memories of catching butterflies, singing larks and a love for our beautiful country. I am now one of the many refugees who had to move South (but thankfully not East) in search of work but as much as I miss my mountains I have the light inside of me that somewhere hares are buzzards are flying through our wild places, which I see as the largest jewel in Wales resources.

But Nature is in decline, and the government is not doing enough to halt this loss, let alone develop this resource. It is Wales ONLY strength - do not fool yourselves with imaginings. We are small and must embrace who and what we are, not struggle to mimic others.

The Nature Recovery plan needs to be a fully funded plan of action that meets nature's needs (don't just integrate plans and policies as currently suggested). We need to commit to improving our network of protected sites and priority species and habitats. Invest in gathering the scientific evidence we need to see how recovery is going (or not going!) and enshrine in law through the Environment (Wales) Bill a strong duty for public bodies to further conservation and enhancement of biodiversity in their activities and specific targets that promise to reverse declines in nature.

Please help us make Wales a country where we can be proud to live in, to pass on to our children. I want to be proud of you, and the work that you will do for a Welsh future.

Pob lwc

Ref: 0022 - Roger Pawling

Good day

I am writing to comment on the Nature Recovery Plan and Environment (Wales) Bill. In principle I fully support such a bill and its current general proposals. However, I believe it is weak in several areas which need to be strengthened if it is to achieve its objectives.

- We need a fully funded plan of action that meets nature's needs. While "Natural Resource Management" will integrate policies and plans to change the way people work across the environment in Wales. On its own it is not enough.
- Improving our network of special places and most threatened and precious wildlife is essential. The sites designated as important for biodiversity must be bigger, better managed and more connected if our threatened wildlife is to be restored. And they must be effectively protected. The plan to build the M4 relief road right through one of the most important sites in Wales is of course utterly at odds with this, and it seems doubtful that the Assembly Government has any credibility left in claiming to protect the biodiversity of Wales.
- Investment in scientific evidence is essential. We need to be able to see what's working and what's not. Therefore monitoring the condition of sites and trends for a full range of species and habitats is essential.
- Welsh Government must show strong leadership and ambition by making it law to achieve nature's recovery. We need the Environment (Wales) Bill to enshrine in law long-term legally binding targets that promise to reverse declines in nature. We need the law to also declare it a duty of all public bodies "to further the conservation and enhancement of biodiversity" in their activities. This will give nature recovery the power it needs to succeed.

- Renewal energy and protecting biodiversity can and should develop "hand-in-hand". Our biodiversity will only survive if we strenuously work to reduce and ameliorate the effects of climate change. This means pushing hard to move from fossil fuels to renewable energy sources. A necessary part of this is building wind farms. These are generally opposed by those living locally. But, the Assembly Government and Assembly Members need to show courage in their convictions and explain to objectors that these are necessary. At present AM's fall over each other to curry favour with objectors. This is patently incompatible with a national policy on protecting the environment.

Thank you for the opportunity to comment.

Ref: 0023 - Doug Bennett

As a resident of Wales, a member of the WWF and the RSPB, and a contributor to various other conservation bodies, I write in response to the public consultation regarding the Nature Recovery Plan and the Environment (Wales) Bill, to express my dismay and concern over what appears to be a serious lack of action and funding contained therein.

The Welsh Government is responsible for providing a protective framework for the preservation and improvement of the environment in Wales, for the protection and well being of wildlife and the quality of life for the people of Wales, and this requires a firm and funded commitment to act positively. Investment is required to restore and create special sites and reserves, large enough to provide suitable habitat for wildlife, especially threatened and endangered species, and to provide links between these areas, thus encouraging movement of wildlife, enabling stabilisation and growth of populations. Action is also needed to monitor these sites and reserves, to see exactly what is needed to achieve success.

The Nature Recovery Plan and, vitally, the Environment (Wales) Bill and any subsequent Act, MUST incorporate adequate and long term action to protect, preserve and create the right environment for nature and wildlife to thrive and flourish. By so doing, the quality of the Welsh environment, the richness and diversity of it's wildlife, and the quality of life for everyone in Wales will be greatly enhanced.

Please take this opportunity to make a significant improvement for the benefit of the people and wildlife of Wales.

Ref: 0024 - Tessa Pearson

As a member of RSPB I am writing to ask you to please include a fully funded plan of action on the ground to restore our most precious and threatened wildlife and create space for nature in our special sites and our wider countryside and seas in the Nature Recovery Plan.

Welsh Government must show strong leadership by making it law to achieve

nature's recovery. We need the Environment (Wales) bill to enshrine in law legally binding targets that promise to reverse the declines in nature. Also we need the law to declare it a duty of all public bodies "to further the conservation and enhancement of biodiversity" in their activities. This will give nature recovery the power it needs to succeed.

Ref: 0025 - John & Gillian Cooke

We are pleased to note that the Welsh Government is preparing a Nature Recovery Plan and a new law, the Environment (Wales) Bill. However the plan contains very little action to meet nature's needs. The State of Nature report published by 25 wildlife organisations in May 2013 showed clearly that one in ten of all species assessed in the report are under threat of extinction.

The Natural Recovery Plan doesn't say much about how nature's recovery is to be achieved. The plan contains many good words, but doesn't show the commitment to action or access to funding that will make the difference nature needs. Instead there is an idea called "natural resources management" to join up the different ways people work across the environment in Wales. This joined up approach is necessary, but is not a substitute for action for nature in our field, wetland, seas and mountains.

The Nature Recovery Plan must include a fully funded plan of action on the ground to restore our most precious and threatened wildlife, and create space for nature in our network of special sites, and across our wider countryside and seas. Monitoring measures must be included so we can see whether we are meeting nature's needs.

The Environment (Wales) Bill needs to use its power to unite society to save nature. It must set long-term legally binding targets for nature's recovery, and declare it a duty of all public bodies "to further the conservation and enhancement of biodiversity" in their activities. With these points enshrined in law, action for nature will be a priority in Wales.

Please ensure the Bill incorporates the required fully funded plan of action that meets nature's needs. Our wildlife will not recover as a result of the Government's "Natural Resource Management" approach alone. This integrated policy to change the way people work across the environment in Wales may go some way to help, but on its own it is not enough.

Improving our network of special places and most threatened and precious wildlife is essential. We need Welsh Government to invest in restoring our special sites and priority species and habitats. Our sites must be bigger, better and more connected and our threatened and precious wildlife restored. Commitment to improving these crucial nature conservation tools in the Nature Recovery Plan is essential.

Investment in scientific evidence is essential, We need to be able to see what's working and what's not – monitoring the condition of sites and trends for a full range of species and habitats is essential. This helps us see nature's needs and ensures we're using the right tools for the job. We can't restore the nature we've lost if we can't see what we're doing.

Welsh Government must show strong leadership and ambition by making it law to achieve nature's recovery. We need the Environment (Wales) Bill to enshrine in law long-term legally binding targets that promise to reverse declines in nature. We need the law to also declare it a duty of all public bodies "to further the conservation and enhancement of biodiversity" in their activities. This will give nature recovery the power it needs to succeed.

Ref: 0026 - Simon Bazeley

Please gwt it right for nature as without nature wales would not be the same and it also a good business on Wales as well a good learning curve for our children

Ref: 0027 - Ian Morris

I am writing to you in order to express my concern at the weak proposals you are currently putting forward to assist the rejuvenation of nature in Wales. It is clear they will not be anywhere near sufficient.

I would ask you to prioritise the following matters.

Fully fund a plan of action that meets nature's needs and do not integrate plans and policies as currently suggested.

Commit to improving our network of protected sites in Wales.

Invest in gathering the scientific evidence needed to determine whether any progress is being made to arrest environmental deterioration.

Enshrine in law via the Environmental(Wales) Bill a strong duty for public bodies to prioritise environmental issues more than at present.

Without these assurances from you I shall in future not be supporting your party at the forthcoming elections and will switch my allegiance to the Green Party.

Ref: 0028 - Christine Matthews

I live in beautiful Gwynedd where nature is so important, but survival of wild life of all sorts is balanced on a knife edge. I am delighted to hear that you have devised a Nature Recovery plan for Wales, but would urge you to take the next logical step and set plans and targets to measure the results your actions. Your progress will be watched carefully, because many of us care deeply about such matters.

Ref: 0029 - Malcolm Appleton

I am pleased to hear that the Welsh Government is trying to keep its promise to halt wildlife loss and reverse declines by preparing a Nature Recovery Plan and a new law, the Environment (Wales) Bill. However I feel that the following must be considered:

- We need a fully funded plan of action that meets nature's needs. Welsh Government thinks our wildlife will recover because a new approach called "Natural Resource Management" will integrate policies and plans to change the way people work across the environment in Wales. This process may go some way to help, but

on its own it is not enough.

- Improving our network of special places and most threatened and precious wildlife is essential. We need Welsh Government to invest in restoring our special sites and priority species and habitats. Our sites must be bigger, better and more connected and our threatened and precious wildlife restored. Commitment to improving these crucial nature conservation tools in the Nature Recovery Plan is essential.
- Investment in scientific evidence is essential. We need to be able to see what's working and what's not – monitoring the condition of sites and trends for a full range of species and habitats is essential. This helps us see nature's needs and ensures we're using the right tools for the job. We can't restore the nature we've lost if we can't see what we're doing.
- Welsh Government must show strong leadership and ambition by making it law to achieve nature's recovery. We need the Environment (Wales) Bill to enshrine in law long-term legally binding targets that promise to reverse declines in nature. We need the law to also declare it a duty of all public bodies "to further the conservation and enhancement of biodiversity" in their activities. This will give nature recovery the power it needs to succeed.

Ref: 0030 - Robert Dennison

As a long-standing member of various conservation bodies in Wales, I am concerned that the Welsh Government's proposals in respect of its Nature Recovery Plan and the Environment (Wales) Bill are missing some essential components.

Nature Recovery Plan

The joined-up thinking underlying the 'Natural Resource Management' approach is not without merit, but it would be misguided and hopelessly optimistic to think that this is sufficient in itself to ensure the recovery of our wildlife.

If Welsh Government is serious about the recovery of nature, then the Nature Recovery Plan must be much clearer about what specific actions will be needed on the ground.

Just as important, those identified actions must be underpinned by a clear allocation of funding and by establishing a range of objective, long-lasting and scientifically-based monitoring measures.

Not only must Welsh Government invest in restoring our special sites and priority species and habitats, but it must also commit resources to counteract chronic fragmentation, by ensuring improved connectivity across the wider Welsh landscape.

Environment (Wales) Bill

The Bill needs to extend the welcome, 'joined up' approach represented by 'Natural Resource Management', by declaring a duty on all public bodies to reverse declines in nature and to further the recovery, conservation and enhancement of biodiversity

in all their activities.

The Bill needs also to set measurable, legally-binding and time-bound targets for reversing nature's decline and for achieving its recovery.

With these points enshrined in law, only then can the Welsh Government can demonstrate its genuine commitment to the recovery of nature in Wales.

Land Agent:
T. L. Till, A.C.A., F.R.I.C.S., F.A.A.V.

09 OCT 2014

Powis Castle Estate Office,
Welshpool,
Powys.

SY21 8RG

6th October 2014

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Welsh Assembly Government
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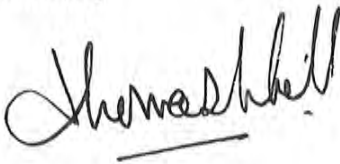
Dear Sir/Madam

Nature Recovery Plan for Wales – Consultation Response

We have pleasure in enclosing our response to your consultation and note that comments have to be received by 3rd December 2014. We would be obliged if you would acknowledge receipt of the enclosed and take account of the points raised therein.

Wales has the capability of undertaking habitat and nature conservation in a far more pragmatic action based and cost efficient way and we would urge you and the relevant departments to resist the temptation to introduce yet more legislation. There is however a desperate need to rationalise and prioritise existing legislation to get a better “balance”.

Yours faithfully



Enc

NATURE RECOVERY PLAN FOR WALES – CONSULTATION RESPONSE

(T.L.Till FRICS - Land Agent with 35 years in rural estate management)

EXTRACTS FROM "A QUESTION OF BALANCE"

First Published in 1999 by what is now called The Game and Wildlife Trust

This excellent book summarises beautifully the tensions within the British countryside when it comes to conservation. It highlights the consequences of modern living and the product of some Government policies that affect our wildlife and everyone concerned about it should be encouraged to read it.

WE URGE THE WELSH GOVERNMENT TO CONSIDER FULLY THE RECOMMENDATIONS HIGHLIGHTED IN CHAPTER 3.6 A COPY OF WHICH IS ATTACHED. GOVERNMENT WILL ACHIEVE LITTLE WHEN IT COMES TO CONSERVING BIODIVERSITY IF IT ALIENATES LANDOWNERS THROUGH INFLEXIBLE LEGISLATION AND REGULATION.

30 YEARS OF EVER INCREASING LEGISLATION HAS NOT BEEN PARTICULARLY SUCCESSFUL IN DELIVERING EFFECTIVE CONSERVATION YET IT HAS COST A HUGE AMOUNT OF TAXPAYERS MONEY. THIS HAS BEEN HIGHLIGHTED IN THE "STATE OF NATURE IN WALES" REPORT – AN ADMISSION OF THE FAILURE OF RELIANCE ON LEGISLATION.

MORE WILDLIFE LEGISLATION IS CLEARLY NOT THE WAY FORWARD.

IF GOVERNMENT POLICY AND/OR LEGISLATION REMOVES THE "PRIDE OF OWNERSHIP" FROM LAND OWNERS THEY WILL ABANDON THEIR EFFORTS TO PRESERVE, ENHANCE AND INVEST IN THE FUTURE FOR OUR WILDLIFE AND INSTEAD REQUIRE GOVERNMENT TO DO OR PAY FOR THE WORK. NO GOVERNMENT WILL EVER HAVE SUFFICIENT RESOURCES TO MEET DEMAND AND THE DOWNWARD TREND IN LOSS OF WILDLIFE AND HABITAT WILL CONTINUE OR EVEN ACCELERATE.

ANY NEW OR CONSOLIDATED WILDLIFE LEGISLATION MUST RECOGNISE THAT WHEN A SPECIES THAT HAS NO NATURAL PREDATOR, SUCH AS SOME BIRDS OF PREY, FOXES, BADGERS AND DEER, ARE GIVEN STATUTORY PROTECTION BY HUMANS THEN HUMANS HAVE A RESPONSIBILITY TO KEEP THEIR NUMBERS IN BALANCE – THAT MEANS ALLOWING SOME CULLING. (Example: In our area we now have so many badgers we have not seen a hedgehog in fifteen years – that can't be right, the 'balance' is wrong and someone has to be authorised to make amends).

WELSH GOVERNMENTS 'STRATEGIC ACTIONS' OUTLINED IN THE CONSULTATION SEEM TO US TO BE LITTLE MORE THAN A WISH-LIST, MOSTLY INVOLVING TALKING AND PRODUCING YET MORE PAPERWORK. IN OUR VIEW THE ONLY RELEVANT ACTION IDENTIFIED IS TO 'PRODUCE BETTER GOVERNANCE TO BENEFIT NATURE'. TO DO THAT YOU HAVE TO INSENTIVISE AND MOTIVATE LANDOWNERS AND ENSURE THAT WG'S LIMITED RESOURCES ARE UTILISED TO "DO" SOMETHING IN THE COUNTRYSIDE – REPORT WRITING, DESK JOBS, LEGISLATION AND LITIGATION WILL NOT PLANT OR SAVE THE HABITAT OF A SINGLE RARE SPECIES.

WE URGE THE WELSH GOVERNMENT TO FOCUS ON WHAT IT CAN DO AND NOT GET DISTRACTED BY WHAT, AS AN ACADEMIC EXERCISE, IT MIGHT LIKE TO DO I.E. BE REALISTIC AND PRAGMATIC OTHERWISE ALL OUR EFFORT AND MONEY WILL CONTINUE TO BE WASTED.

6.10 2014 (ttill@powis.org.uk)

The Privatisation of Biodiversity?

New Approaches to Nature Conservation Law

A summary report of an AHRC-funded project examining the legal issues concerning potential new legal mechanisms for the conservation of biodiversity.

Prepared by:

Prof. Colin T. Reid
Dr. Walters Nsoh

School of Law, University of Dundee



Arts & Humanities
Research Council



SUMMARY

The UK failed to meet its target of halting biodiversity loss by the end of 2010. Although some progress is being made, the current policy and regulatory approaches have not prevented, far less reversed, the loss of biodiversity across the country. There is scope to introduce a wider range of mechanisms to support conservation, making greater use of private sector initiative and resources and introducing elements of a market approach.

Such mechanisms include:

- **Biodiversity offsetting:** development causing a loss to biodiversity in one place is allowed to proceed so long as ecological gains are achieved elsewhere, thereby ensuring no net loss to biodiversity.
- **Payment for ecosystem services:** land managers receive payments to reflect the benefits that their land is providing to the wider community, e.g. habitat for pollinating insects or water management, thereby creating an incentive for them to maintain or enhance these services whilst those who benefit contribute to the cost.
- **Conservation covenants:** landowners make long term agreements which control the future use and management of the land, by them and by their successors in title, either as a conservation tool in its own right or as the legal basis for delivering an offset or payment scheme.
- **Tradable development rights, taxation and impact fees** can also be used.

Elements of these are already present within the UK and further developments are currently under active consideration. There is undoubtedly scope to achieve conservation gains through developing such mechanisms. Stakeholders from all sides see the potential of these, but also risks, so that careful working out of the details is necessary before significant progress can be made. Experience in other countries or with other environmental policies and markets cannot be simply copied. There is room to experiment, so long as initiatives are used to supplement, rather than immediately replace, existing regulation.

INTRODUCTION

The current law on biodiversity conservation ultimately rests largely on the state designating protected sites and species and then imposing restrictions on activities (on- and off-site) that might harm these. In practice this legal foundation is built on in order to produce a partnership approach, working through management agreements to ensure that areas important for wildlife are properly cared for. Various agri-environment and other schemes also provide incentives to landowners who adopt environmentally-friendly practices rather than seeking simply to maximise the commercial productivity of their land. Nevertheless, strong protection of the designated sites and species remains at the core of law and policy. This system has been perceived by some as being inflexible, whilst arguably paying not enough attention to biodiversity in the wider environment which in practice is given little consideration in the planning and other regulatory systems.

In other jurisdictions, a wider range of tools is employed to support biodiversity, most of which rely more heavily on private initiative and funding than the present law. An AHRC-funded project at the University of Dundee explored the potential for their use in the UK, examining the ways in which they might fit within the legal context here. At a time when the resources available to the public conservation agencies are likely to be restricted, the greater emphasis on private initiative and funding is of particular interest.

Such mechanisms also present a different view of biodiversity interests in terms of their legal status, their nature as public or private goods and their place in relation to competing public and private interests. To the extent that they represent a “privatisation” or “commodification” of biodiversity, this marks a significant departure from existing conceptual approaches which view nature more as a common heritage than as a subject of commercial transactions. Similar issues have arisen in other areas of environmental law, e.g. arguments that pollution taxes represent an unacceptable licence to pollute so long as one has enough money.

A number of possible mechanisms can be considered. Most of these do already operate within the UK, but only in a very limited way and they could be developed to play a more major role in biodiversity conservation. The mechanisms are outlined first before consideration is given to some pervasive issues which affect any assessment of their potential and the design of particular schemes.

NEW LEGAL MECHANISMS

Biodiversity Offsetting

The basic idea is that where development is justified but there is still some unavoidable harm to biodiversity, then compensatory steps should be taken, on the same site if possible, but if not, elsewhere. This is in accordance with the hierarchy already set out in the planning framework, whereby harm to biodiversity should be avoided, then steps taken to mitigate any harm caused and finally compensatory action taken. The objective is to ensure no net loss to biodiversity, as opposed to allowing the continual erosion which has marked past decades. This approach would allow an alternative to the current position where biodiversity is paid very little attention except where a development may significantly affect a designated site and may be refused permission for that reason. Brokers may be used to match those in need of offsets with those able to offer land and projects for this purpose.

Offsetting is a feature of EU habitat protection law, with compensatory action being required if damage to a Natura 2000 site is permitted because of imperative reasons of overriding public importance. “Mitigation” is a well-established feature of the law in the USA protecting areas of wetlands. In Australia there are various Bio-banking schemes, where developers can buy credits to support approved conservation schemes to make up for harm their projects are causing. Such overseas experience is useful, but must be used cautiously since the mechanisms operate against a very different physical and legal background.

Defra started a two-year pilot project on offsetting in spring 2012, based on voluntary arrangements linked to the planning system. A Green Paper was published in September 2013¹ and was subject to an enquiry by the Environmental Audit Committee of the House of Commons.² Specific issues raised include the metrics used to calculate what constitutes an appropriate offset and how distant from the development site the offset can be located. Also at issue is whether a mandatory system should be used to stimulate the market and encourage land owners to come forward with sites that might be used as offsets.

¹ Defra, *Biodiversity Offsetting in England: Green Paper* (September 2013).

² House of Commons Environmental Audit Committee, *Biodiversity Offsetting* (6th Report of 2013-14, HC 750) and *Government Response* (9th Special Report of 2013-14, HC 1195).

Payment for Ecosystem Services (PES)

The idea of PES builds on increased recognition of the role of the “natural” environment in providing a range of services of great practical, economic and cultural value to society. Those providing such services should be paid for them by those who benefit. Such payment is not entirely new to the UK since there are various powers for the statutory conservation bodies to enter agreements under which landowners receive payments to manage their land as prescribed. A level of environmentally-friendly management has become a pre-requisite for grants under EU agricultural and rural support schemes, with enhanced payments for more far-reaching commitments. Matching those who benefit from a service with those who provide it can be difficult and may be best done through grant and subsidy schemes, although more individualised arrangements are possible, e.g. a company paying the landowner who is providing it with a biodiversity or carbon offset.

In the spring of 2013 Defra published the *PES Best Practice Guide*³ that identified among other things a number of key principles that ought to underpin PES schemes and a number of pilot projects are currently being funded. The pervasive issues noted below apply here, relating to monitoring, enforcement, the duration of any scheme and the degree of compulsion, and the inherent difficulties of valuation and attributing costs and benefits to specific people.

It is important to specify the particular service being paid for, including whether services should be treated singly or as a bundle, e.g. restoring a peat bog that counts as a biodiversity gain for an offset may also serve as a carbon sink, potentially attracting further payments. Most existing schemes pay for the input, i.e. the cost of certain management activity such as planting a hedge, rather than for the actual service provided, e.g. the number of birds in fact benefiting from the hedge. This can mean not rewarding those responsible for maintaining the service flow in the medium and long term. Other issues include reconciling different PES contracts with overall development plans and strategies, the cost of identifying all the parties involved and establishing the form and structure any agreements should take. Also at issue is whether payment should go to those who have maintained their land in good condition, or those whose land is most degraded, offering the greatest opportunity for immediate biodiversity gains.

³ Defra, *Payments for Ecosystem Services: A Best Practice Guide* (May 2013).

Conservation Covenants (also known as conservation easements or burdens or servitudes)

These are enduring restrictions on the use of land to serve a conservation purpose. The restriction is accepted by the landowner (in return for payment or through personal motivation) and is not just a personal agreement between the parties but becomes a long term restriction on the land, continuing when the land is transferred to new owners (in perpetuity or for a fixed duration). These can be enforced by the holder of the covenant, e.g. a conservation body, and are a matter of private law rather than public regulation. Legal policy has historically been against supporting such enduring limitations on the use of land, unless for the benefit of specific neighbouring land. However they are widely used in the USA and in Scotland conservation burdens were introduced as part of the wholesale reform of land law at the start of this century. Covenants can be used as a conservation measure in their own right, or as the vehicle underpinning the long term arrangements required for offsetting or PES schemes.

The Law Commission in England and Wales issued a consultation paper on this subject in 2013⁴ and a report, including a draft Bill, is expected before the middle of 2014. Significant issues arise over whether only certain designated bodies should be able to enter such agreements with landowners, over how these terms can be enforced and by whom, and over whether and how it should be possible to override the restriction in the future. The current proposals in England and Wales only allow covenants to be made with certain public or approved bodies and to be made in perpetuity or for a fixed period, but with the possibility of their being extinguished by agreement or with third party approval (e.g. by tribunal). It may be possible for a third party (e.g. the Minister or statutory conservation body) to intervene if a covenant holder is not enforcing the terms of a covenant.

Tradable Development Rights

Following the pattern of “cap-and-trade” models developed for greenhouse gases and other emissions, it might be possible to identify areas of a distinct habitat and set a maximum amount of development causing loss/degradation of that habitat that is acceptable. The right to carry out such development could then be allocated between the landowners affected, who are free to use their rights or not as they wish. Those who wish to maintain their land in its current

⁴ Law Commission, *Conservation Covenants: A Consultation Paper* (Law Com No 211, 2013).

state are free to sell their rights to allow others to increase the extent of development elsewhere.

This approach highlights conceptual issues over converting “nature” into a tradable commodity and expressly recognising the right to destroy (part of) a valued habitat. Significant further issues include establishing the boundaries of the scheme, the level of development to be permitted, the allocation system used (from equal shares to open auction), the monitoring of the habitat that is marked for conservation and the extent to which additional forms of regulation are still necessary to avoid localised problems.

Taxation

More use could be made of the tax system, whether to encourage the careful stewardship of valuable habitat, to discourage damaging activities or as the means of delivering payment for ecosystem services, whether collecting from beneficiaries or rewarding providers. There are opportunities in relation to taxes of many sorts, linked to income or capital transactions. These could build on existing arrangements for relief in relation to works of art and other forms of national heritage. Such tax arrangements could make use of established administrative regimes, but may not always fit easily within the wider financial, regulatory and policy contexts.

Impact Fees

Where damaging development is taking place, there are arguments that the developer could be required to pay a fee to compensate for the harm being done to nature. The Community Infrastructure Levy in England and Wales might be used as a model, with the sums raised being dedicated to conservation purposes. Issues arise over valuation, the recipient of the payment and the ways in which the proceeds can be used to ensure a benefit to biodiversity. Again this can be seen either as a form of implementing the Polluter Pays Principle, or of allowing those with the capacity to pay to destroy what should be cherished as our common heritage.

PERVASIVE ISSUES

In considering the fundamental acceptability or detailed design of any such mechanisms a number of pervasive issues arise, with different intensity at different points. It is important to realise that many of these are not unique to this context, e.g. deciding what species and habitats to designate for special protection already involves a form of comparative valuation, and that although

they raise challenges there is experience of overcoming these. Awareness that the perfect solution has not been found should not stand in the way of initiatives which can improve the present situation.

Exchangeability

Biodiversity is not fungible like greenhouse gas emissions; creating new wetland sites does nothing for the lizards whose habitat is destroyed if areas of heathland are built on. Limiting offsets to “like-for-like” arrangements, so that the habitat being provided must be of the same sort as that being lost, may provide stronger protection for biodiversity but limits the flexibility which is an attraction of the scheme. Conservation might benefit if there could be some “trading up”, achieving gains for particularly rare habitat at the cost of something more “ordinary”, but on the other hand biodiversity might suffer if offsets concentrate on providing less special or a smaller range of habitats (e.g. because they are easier and cheaper to establish).

Valuation

There has to be a means of valuing the ecosystem services to be paid for or the biodiversity losses and gains within an offset deal. There is tension here between a sophisticated system that captures the complexity of the natural world and one that is much simpler and easy to operate. Issues such as the public preference for certain species come into play as well as the absence of certainty over whether current action will actually deliver biodiversity benefits in future.

Timing and duration

Habitat restoration or creation is not an instant or guaranteed process; steps to create even some of the apparently simple habitats such as salt-marshes may not deliver sites of the same richness as the natural ones being lost. It may need a very long time for habitats such as woodland to become established. This temporal dimension raises the question of how much credit should be given today for measures to establish an offset or provide a service that may (or may not) produce biodiversity benefits only in several decades’ time. There is also the issue of how far into the future an offset should be guaranteed before it can be accepted as compensating for the loss of habitat. Moreover any projections are rendered uncertain by the possible effects of climate change and other changes in the future. Such risks have to be factored into the valuation process and may also suggest allowing a degree of flexibility as opposed to having arrangements fixed in perpetuity. This avoids being stuck with terms which may in future no longer be offering the best ecological option, but does create a risk of arrangements being altered for other reasons.

Location

New habitat creation or restoration requires a larger area to provide benefits equivalent to those provided by an area of long-established habitat that is being lost. There are also strict physical limitations (geology, climate, elevation, water resources, disturbance) on whether and where any habitats can be enhanced, restored or created. Moreover there is the dimension of human engagement. A small woodland in an urban setting may be scientifically less valuable than the same area connected to a larger forest in a remote area, but it will have much more value in terms of human interaction of all sorts. It is undesirable to end up relocating all biodiversity sites away from the areas of development pressure, leaving the population in urban areas even more removed from the natural world. A possible solution is “unbundling” benefits to allow different elements (e.g. amenity and ecology) to be compensated in different places or rewarded separately.

Coherence

Effective conservation of biodiversity also requires a coherent programme and cannot be achieved in a fragmented way. Whereas the main concern in relation to greenhouse gases is simply the overall global concentration, there is no point in focusing on measures that will support only one stage of a species’ life-cycle or one stage of its migration. Habitat is also more valuable when connected with other suitable areas as opposed to being located in isolation, and sites that are of limited inherent value may play a significant role in connecting more valuable areas.

Additionality

The award of any offset credit or payments for ecosystem services must be for providing something more than would be provided in any case. Judging this can be difficult, especially against what is an ever-changing background of reforms to the Common Agricultural Policy, rural support and planning policies, which alter the priority given to conservation.

Market creation

A scheme based on trading of any sort between parties (e.g. offsetting) must establish a working market, setting out what can be traded and seeking to achieve a sufficiently large market to operate effectively and efficiently and without distortions or high transaction costs. This can affect decisions such as whether schemes are voluntary (willing participants but likely to be few in number) or mandatory (many more participants creating the basis for a healthy

market, but with not everyone sharing a commitment to the overall objective of stronger conservation).

Property rights

The entitlements, liabilities and responsibilities within any scheme must be clearly defined and secured, potentially over prolonged periods into the future. The precise nature of any new rights created must be clear and fit with existing structures, e.g. the different rights of landlords and tenants, the special rules for agricultural tenancies and the rights of the various parties over common or crofting land.

Monitoring and enforcement

The monitoring and enforcement of any arrangements creates challenges, especially since the new mechanisms may seek to secure benefits decades into the future. Provisions must be in place to provide assurance that initial valuations have been carried out properly, that promised work and future management is actually carried out and that the terms of any agreements will be enforced.

Governance

The outcome of conservation measures is of interest to the wider community, not just those engaged in individual arrangements. Governance structures must be established which allow for transparency (not least to reassure the public that people are not “getting away with” damaging the shared natural heritage for private gain), accountability (of schemes as a whole and at the individual level) and appropriate public participation (especially where schemes in effect transfer the responsibility for conservation from public bodies to private markets).

Ethics

Beyond the technical, legal questions is the more ethically based concern of whether it is ever acceptable to see biodiversity as something that can be traded. It can be argued that putting an economic value on biodiversity creates incentives for conservation, providing a new source of funding for valuable conservation work and the opportunity to ensure that the “polluter is paying”. Planning and policy prioritisation are dominated by economic thinking, and giving biodiversity an economic value allows it to “become part of the game” as opposed to being ignored. On the other hand, putting an economic value on biodiversity risks treating nature (part of our shared heritage) as something humans are free to use or destroy at will just like commercial goods, and

permitting the natural world to be sacrificed for economic gain. We should be stewards of nature for future generations. From this perspective, it would be fundamentally wrong to treat the living (and non-living) entities we share the planet with as mere commodities with an economic value and nothing more.

CONCLUDING REMARKS

New initiatives such as the ones discussed here, that engage the private sector and include elements of a market approach, have potential in the field of biodiversity conservation. There are major challenges in designing effective and enduring frameworks, but concern that we do not have a perfect solution should not stop us doing things which can be an improvement on the current position. A legal analysis such as this can identify the scope for and obstacles to the adoption of these new mechanisms; it cannot tell the whole story but a fuller evaluation is possible only once the options have been identified. As well as technical issues, the different relationships between humans and nature embodied within different approaches must also be considered. Schemes developed overseas to protect large areas of pristine habitat may not be suitable for supporting biodiversity in a richly varied, densely packed and heavily managed environment created by human intervention over many centuries. Nevertheless, there are useful lessons that can be learned. Initially these new approaches are likely to be a supplement to direct regulation, not a replacement for it, allowing more scope for experiment and imperfections.

The Privatisation of Biodiversity? is an Arts and Humanities Research Council (AHRC) funded research project at the School of Law in the University of Dundee ending in April 2014. It is led by Prof. Colin T. Reid, with Dr. Walters Nsoh as a full-time postdoctoral research assistant.

A book arising from the project should be published in 2015.

For further information

- contact Prof. Reid at c.t.reid@dundee.ac.uk
- or visit his pages on the University of Dundee's Discovery Research Portal at [http://discovery.dundee.ac.uk/portal/en/persons/colin-t-reid\(b578f8df-9c72-4d4b-80ff-19d96971a185\).html](http://discovery.dundee.ac.uk/portal/en/persons/colin-t-reid(b578f8df-9c72-4d4b-80ff-19d96971a185).html)
- or visit <http://www.dundee.ac.uk/law/research/archivedevents/>

Fuller examination of many of the issues discussed here can be found in the following publications:

C.T. Reid: Between Priceless and Worthless: Challenges in Using Market Mechanisms for Conserving Biodiversity

- (2013) 2 Transnational Environmental Law 217-233

C.T. Reid & W. Nsoh: Biodiversity Offsets and Conservation Covenants

- (2013) 25 Environmental Law and Management 93-96

W. Nsoh & C.T. Reid: Privatisation of Biodiversity - Who can sell ecosystem services?

- (2013) 25 Environmental Law and Management 12-20

C.T. Reid: Conservation Covenants

- [2013] 77 The Conveyancer and Property Lawyer 176-185

C.T. Reid: The Privatisation of Biodiversity? Possible New Approaches to Nature Conservation Law in The United Kingdom

- (2011) 23 Journal of Environmental Law 203-232

C.T. Reid & W. Nsoh: Whose Ecosystem is it anyway?: Private and Public Rights under New Approaches to Biodiversity Conservation

- Journal of Human Rights and the Environment (forthcoming)



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1 Do you agree with the focus of the ambition on addressing the underlying resilience of our ecosystems and identifying and capturing benefits for society? If not, what else do we need to consider?

The approach of addressing the underlying resilience of our ecosystems is welcomed however it should be acknowledged that nature/biodiversity have the right to exist equally to human beings, not simply to provide services and benefits to human society. The EU and CBD visions both include concepts of valuing and conserving/protecting biodiversity – the idea that we are guardians of nature is absent and the intrinsic value of biodiversity is lost.

The role of protected areas should be clarified, protected areas alone are not sufficient to maintain biodiversity; the focus should be on increasing biodiversity and connectivity outside of protected areas.

The partnership supports the concept of building resilience and addressing the whole ecosystem but would like it to be noted that natural resource management is a new concept which has not yet been tested; other approaches may also be needed. The success of natural resource management will depend on the financial and policy commitment from all Welsh Government departments.

2 Does the ambition statement capture this new approach fully? What might be added?

The language and ambition statement is business like detailing the economic value of biodiversity and for nature conservation to be treated as an investment and/or insurance policy and speaks of ways to manage resources for human society. The statement needs to include references to the intrinsic value of biodiversity as stated above and the tone needs to be altered in light of the points made in answer to question 1 - that is that we are guardians of nature and nature is not simply present to serve us. The statement also needs to be time limited - by 2020 - in order to fulfil our EU and CBD obligations.

3 Are the goals the right ones? What might be added?

We support the principles of the goals however they are too vague - time limit and specific targets should be added along with examples of existing or proposed actions such as policy changes or agri-environment schemes.

Improve degraded habitats at scale - more detail needs to be added, which habitats, which scale, how much improvement?

Address negative factors and increase connectivity- which factors will be addressed, will connectivity be increased?

Management of highest quality environments – does this mean protected sites? Is there a need to designate more in order to hit CBD targets?

No net loss of biodiversity – 'no net loss' is not enough to generate biodiversity recovery, our systems are so degraded that the current extent of habitat and populations of species is not enough to maintain themselves or the ecosystem services they provide, we should be providing net biodiversity gains in addition. Our concern about 'no net loss' is linked to our concerns about

biodiversity offsetting detailed later. Biodiversity gains should be integrated into planning policy – every planning application to clearly state what the biodiversity gain will be.

Biodiversity outside of protected areas is becoming increasingly important to maintain species populations and deliver ecosystem services. There needs to be a goal to improve management and protect biodiversity beyond protected sites. Measures could include investment in the Wildlife Sites System, Glastir improvements, planning policy etc.

In order to integrate and mainstream biodiversity government sectors, there needs to be high level commitment to embed biodiversity recovery into all government departments. The 2011 Inquiry into Biodiversity clearly stated that the failure to meet the 2010 target was due to a lack of government commitment, and recommended all government departments should be given sub-targets on biodiversity, to ensure integration of the commitment to halt biodiversity loss.

In order to mainstream biodiversity across society, there needs to be an element of public engagement and education. This is one area where we appear to be successful, as many people are interested in nature conservation, and many schools are involved in schemes such as Forest Schools and through LBAPs Officers (where they still exist). We now need action to capitalise on this interest and turn it into action for biodiversity.

4 Are the action proposed right and adequate?

We agree with the proposed actions however we have the following comments to make. The Focus for Action doesn't include action on the ground, unless implied in 'maintaining' habitats and species. It should be noted that maintaining current levels of biodiversity is insufficient to deliver resilient ecosystems. There is the concern that priority species and habitats are to be chosen by society, the CBD requires signatories to make decisions based on sound science.

- **Putting in Place effective natural resource management**

See earlier comments on natural resource management. There is no indication as to how the National Natural Resource Policy (and SoNaRR) will integrate with this plan.

Delivering a Welsh National Marine Plan

We support the delivery of a Welsh Marine Plan.

- **Facilitating Cross Sector Policy Integration**

Integration with the planning system especially needed. No mention of Glastir?

Cross sector policy integration does not go far enough – embedding the ecosystem approach across government means that responsibility for reversing biodiversity decline should rest with all departments and agencies. The nature recovery plan is an opportunity to underline the connection between biodiversity and ecosystem function. Biodiversity also needs to be recognised as a 'central plank' of sustainable development, as opposed to the current focus on society and economy.

NERC and local authority action need to be strengthened/enforced. Currently many local authorities have lost their biodiversity officers, and more are likely to be lost in the proposed mergers. There is

no-one to support local authorities in carrying out their NERC duty. The Inquiry into Biodiversity recommended that the NERC act be strengthened by new legislation placing 'a duty to support and promote biodiversity on relevant organisations'.

- **Funding our Partners**

Funding needs to be extended over more than 12 months (at least three years) to ensure long term visions are realised.

Biodiversity Partnerships are in an ideal position to implement biodiversity work on the ground, along with the LBAP system to guide work and reporting via BARS. The loss of biodiversity officers as a result of Local Authority cost saving measures should be reversed with increased support and acknowledge of the importance of this role within the Local Authority. With the loss of Biodiversity Officer is the potential for collapse of the biodiversity partnerships and associated collaborative projects, the importance of maintaining existing relationships between organisations should not be underestimated. The potential for the existing partnerships is vast, as recently seen by the collaborative projects put together as part of the Nature Fund applications - although it should be noted that the appetite for collaborative working already existed through the LBAPs. The Nature Fund was an experiment which demonstrated a number of things - the need for long term funding; the need for sufficient time for partnerships to plan and develop projects; the need for release of funding to be timed so that work on the ground can be carried out at an appropriate time of year; the need to engage with existing partnerships, such as LBAPs; the need to support on-going work as well as new projects; and the need for funding to be allocated according to project effectiveness or conservation priorities (rather than first come first served).

In addition to funding for partners there needs to be clear lines of internal funding within Welsh Government. This is particularly important for NRW, so that they can deliver effective resource management, and for the Wales Biodiversity Partnership so that they can continue to co-ordinate and support biodiversity action. Different government departments and organisations will also require funding to embed biodiversity in their operations. Biodiversity record centres should be directly funded with their remit potentially expanded.

A WG NERC Duty Officer should be funded to provide support and scrutinise statutory authorities.

- **Identifying Financial Instruments**

We have concerns about biodiversity offsetting as a method of achieving biodiversity gains. With the currently limited resources available to plan for this within Local Authorities in particular, it would be difficult to identify areas suitable for biodiversity offsetting and put together plans detailing suitable strategic areas and cost. Funding for strategic ecologists who have the time/resources to focus on forward planning and identifying suitable areas and targets for offsetting would be needed. With current resources any proposed offsetting strategy within a local authority area would not be planned sufficiently and would ultimately lead to losses in biodiversity – allowing developers to simply pay for getting planning approval without the associated well guided, biodiversity gains that could be achieved. Limits should be set on what loss is acceptable, for example it is impossible to replace high value habitats like ancient woodlands like for like, which could potentially take years to

reach the biodiversity value of the lost site (if ever), contradicting 'no net loss' aim. The aim should always be first and foremost to find an alternative, lower value site for development.

Whilst investment is welcomed, approach needs to be treated with caution. Most businesses still don't 'see' the importance of maintaining ecosystem function. There is considerable education work to be done within the private sector. It is also a concern that payment for ecosystem services could skew conservation work towards whatever pays - the most obvious being water quality and flood risk. Important ecosystem services, such as carbon sequestration, may suffer from lack of investment.

- **Reviewing Designated Sites and Species**

There is a concern that a review of the status of designated sites and protected species may pave the way for some SSSIs to be de-notified and for some species to be removed from the WCA eg reptiles or Schedule 1 birds. This will help vested interests such as developers and the strong hunting/shooting/fishing lobby.

Reviews are to be welcomed, in the sense of questioning and improving the effectiveness of the system, but this exercise should not be used as an excuse to remove protection, or to remove perceived barriers to development. The primary purpose of our legislation and regulation is protection of biodiversity and environment and this needs to be upheld.

Monitoring and review regulatory instruments

The EPS licensing system should be reviewed to make conservation management of sites such as nature reserves easier.

There should be a focus on ensuring there is up-to-date guidance on implementing the regulatory instruments in order to aid development control and guide developers in choosing sites etc.

More external scrutiny of statutory authorities is required with consequences for non-compliance of biodiversity duty. Without penalties the biodiversity duty is largely being ignored. Reporting of biodiversity duty via BARS to be compulsory with the re-commencement of visits by Welsh Government (via a dedicated NERC officer) to ensure compliance and/or penalties for non-compliance.

- **Improving the evidence base: research, monitoring and surveillance**

Wales Biodiversity Partnership evidence gaps project identifies a range of vital projects to ensure work is based on robust evidence, funding should be allocated to see these project fulfilled so that any biodiversity action and future strategies are based on sound, solid scientific evidence.

Effective monitoring and integrated reporting is urgently needed. There is no mention of BARS or integrated reporting with other UK countries. The role for biodiversity record centres should be acknowledged as important sources of information with the potential to do more.

More information is needed about the Information Hub and how it will be used.

- **Communication and Engagement**

The extent of communication and engagement already taking place at a local level is not captured. LA biodiversity officers in partnership with local conservation organisations already visits schools undertaking activities and take school groups out of schools to visit local nature reserves and arrange competitions, events and activities with the community all aimed at communicating the importance of biodiversity. The structure for these partnerships already exists and with a little extra support the potential in this area is vast.

A commitment to involve the wider public should be made along with ensuring that caring for biodiversity is embedded within formal education.

- **Governance**

We support the goals of strengthening the Wales Biodiversity Partnership and would like to reiterate the unique position existing biodiversity partnerships already hold within biodiversity conservation. Existing partnerships have seen a reduction in interest over the last few years yet are uniquely placed to deliver biodiversity protection and enhancement on a local scale. A refresh of how these partnerships work is welcomed whilst also acknowledging the important work previously undertaken and the potential for the future. There is some concern that the BAP system is becoming a top-down mandate rather than the grass roots system that was originally intended.

5 What additional actions would you like to see?

As detailed above – better funding, education/engagement, LBAPs, management outside of protected sites, increased integration with policy, commitment from government.

6 How do we engage with Businesses more effectively to deliver our ambition?

Lead by example, provide incentives and penalties, and introduce education and promotion of biodiversity within sector. Provide a grant scheme specifically for businesses to apply to undertake enhancement projects within their grounds and buildings but also to look at sustainable procurement, better travel plans to reduce pollutants etc – create an award or accreditation for biodiversity that will help businesses promote the good work that they are doing and sell more of their products ‘Biodiversity Accreditation’ or link up with third sector organisations which can offer something similar.

7 How can we strengthen the way we work together?

The partnerships are a good way of reaching the goal of working more collaboratively and reducing duplication, the Nature Fund process has shown that this does work with partnerships quickly formed in order to apply for grant funding – although not these partnerships were already in existence and are not a new concept. Similar support on an on-going basis to keep these partnerships focussed is needed, by focussing grant funding towards working collaboratively (specifically within a local biodiversity partnership) and by having a structure to focus projects - such as the existing Biodiversity Action Plans which are still currently in use (or a new structure) and used to guide projects and inform development control. Welsh Government via Natural Resources Wales to be an active part of these partnerships to include grant officers as well as technical staff.

Better communication, respect for third sector and local partnerships and resource appropriately.

8 How can we share budgets and look at integrated outcomes?

By working through partnerships as detailed above.

9 What else can be done to avoid duplication and to deliver our goals?

By basing grant funding on being part of a local biodiversity partnership, with all organisations being part of the same partnership no duplication of projects should take place and a wider variety of organisation/expertise will be involved.

10 How can we best use the information hub to collate and disseminate data and evidence?

We have never used the Hub so raising awareness of it and what it can be used for would be a start. Co-ordinate with LRCs, strengthen their role.

11 How best should we communicate progress with delivery of our ambition, for example by a three or five year work programme or an annual delivery plan?

An action plan, with identified funding to cover at least five years with identified methods of delivery of actions. WG/NRW to be actively involved with delivery partners.

Will depend on NNRP SoNaRR – integrate them, and with reporting rounds for Europe/CBD.

12 Additional Issues/Comments

Is the plan a nature recovery plan or biodiversity strategy? There are no set targets or proposed actions for implementation or agreed methods of funding so appears to be a strategy rather than an action plan? In which case will there be an action plan to go with it? The title and the purpose of the document should be clearer to include what comes next and funding/resourcing mechanisms.

Roles of local authorities, communities and 3rd sector are not included.

Next steps not clear. Responsibilities and commitments not clear.

There is no mention of cross border working or integration with UK

Positive messages and examples should be included.

Additional specific comments from partners –

“Consideration should be given to separating the biodiversity partnerships from the Local Authority to make applying for grant funding easier, or WG should fund them directly”

“It is hypocritical to be emphasising the importance of moorland together with the value of peat since NRW (led by WG) have not objected to the Circuit of Wales application to destroy moorland and its associated peat”

“It is total lacking in any meaningful actions. Fine words and new approaches cannot achieve anything without adequate resources to implement, and there are no sign of such resources being made available. The first important decisions relevant to the Plan, the decision on the M4 relief

motorway and CoW seem to drive a coach and horses through the plan; if these are typical of WGs attitude to the Plan we are all wasting our time!"

"Obviously plans are worthless unless they are properly resourced, so I hope this is more than a statement of good intentions that has a low priority when funds continue to be scarce. Resourcing also has to address having the right experts empowered to deliver the objectives of the plan and gathering and maintaining evidence of progress (or not). Your point about the records centres is well made. My second observation is the need to take action on a landscape scale. This will necessarily cross local authority boundaries and so must be achieved with a minimum of bureaucracy"

Submitted by

Katie Partington

Ecologist for Blaenau Gwent County Borough Council

On behalf of the Blaenau Gwent Biodiversity Partnership

14/11/2014

Tel: [REDACTED]

18th November 2014

Dear Minister,

Environment (Wales) Bill

You will be aware of the campaign which has been launched by the RSPB in relation to the above Bill, seeking to strengthen some of its key aspects.

I write in support of the RSPB, with particular emphasis on the need to action some of the key provisions proposed in this piece of legislation. At the outset, however, I also want to join with RSPB in welcoming the Nature Recovery Plan, much needed in my view, and the fact that you intend this to be enshrined in legislation.

My prime concern in the matter with things as they stand is that the Bill does not say enough about how its objectives are to be achieved: at present, therefore, it could appear as a laudable, but essentially ineffective, "wish list". Of course, I am perfectly well aware of current financial circumstances as they affect a wide range of services across Wales. Indeed, in another forum, I join the argument in favour of the Williams Committee Report since I believe that if implemented, its proposals could result in a much greater and more appropriate use of local government finances and related items, including protection of the environment.

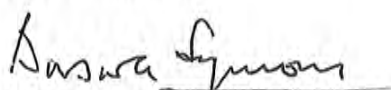
It is essential that the Nature Recovery Plan be funded properly. Even in recent times, in my own area I have witnessed an immense and distressing decline in flora and fauna. For example, we have not heard skylarks or seen yellow hammers around our hills for many years, bullfinches have also all but disappeared, and even commonplace flowers such as primroses seem to be on the decline. And this list is not, of course, in any way ~~an~~ exhaustive.

One of the saddest aspects of these environmental losses is the way in which children presently growing up will have severely diminished opportunities to become familiar with, and to appreciate, our natural wildlife. I know from my own experience with children growing up is that if their interest is caught early enough, they will gain enormously from "simple" pleasures involving learning about our environment, not only giving them the opportunity of developing a life-long source of pleasure but of committing to the protection of the world we live in,

which (hopefully) will be to everyone's benefit. In many places, a good start has been made on engaging young children (and their families) through school-based programmes and projects: perhaps there is further opportunity to develop this relatively low-cost kind of long-term investment in nature recovery/protection? A serious commitment to such schemes, backed by early and realistic financial investment in developing them, is essential.

I very much hope, therefore, that you will do all possible to ensure that the good intentions contained within the Bill will be strongly and meaningfully implemented.

Yours sincerely

A handwritten signature in dark ink, appearing to read 'Barbara Symons', written over a horizontal line.

Barbara Symons

Carl Sargeant AM,
Minister for Natural Resources,
National Assembly for Wales,
c/o Biodiversity and Nature Conservation Branch,
Rhodfa Padarn,
Llanbadarn Fawr,
ABERYSTWYTH,
Ceredigion, SY23 3UR

cc Heather Galliford, Conservation Officer, RSPB Cymru

In the attention of Carl Sargeant.
Welsh Government.

Dear Sir,

The RSPB has drawn my attention to the proposed Nature Recovery Plan which is welcome but its lack of action to meet nature's needs, which is not.

I can do no better than enclose the RSPB briefing note to explain the plan's shortcomings, and add my weight in support.

Yours faithfully
G.R. Watley

Welsh Govt.

Biodiversity & Nature Conservation Branch,

Rhodfa Padarn

Llanbadarn Fawr

Aberystwyth

SY 23 3UR



yn rhoi
cartref i
fyd natur
giving
nature
a home

Tell Welsh Government to put action for nature in its recovery plan

Natural Resources Minister, Carl Sargeant, and his Welsh Government officials are developing a Nature Recovery Plan and new legislation, the Environment (Wales) Bill. The policy plan and new law could go a long way towards saving nature. But there's a problem.

There's not enough action in the plan to meet nature's needs.

Bizarrely, the Nature Recovery Plan doesn't say much about how we're going to achieve nature's recovery. There is very little action included in the plan. It contains many good words, but it doesn't show the commitment to action or access to funding that will make the difference nature needs.

Instead Welsh Government has pinned its hope for nature's recovery on an idea called "**natural resource management**". This proposes to integrate plans and policies to join up the different ways people work across the environment in Wales, from farmers to fishermen, conservationists to construction workers. This joined up approach makes sense and is necessary. But Government is missing the point if they focus on process at the expense of action for nature in our fields, wetlands, seas and mountains. On its own, Welsh Government's "natural resource management" is not enough to bring back our wildlife.

For nature to recover, it needs strong leadership from Government:

- The **Nature Recovery Plan** must include a fully funded plan of action on the ground to restore our most precious and threatened wildlife, and create space for nature in our network of special sites, and across our wider countryside and seas. Monitoring measures must be included so we can see whether we're meeting nature's needs.
- The **Environment (Wales) Bill** needs to use its power to unite society to save nature. It must set long-term legally binding targets for nature's recovery, and declare it a duty of all public bodies "to further the conservation and enhancement of biodiversity" in their activities. With these points enshrined in law, action for nature will be a priority in Wales.

Help put action in the Nature Recovery Plan. The RSPB has over 50,000 members in Wales and there are thousands more nature lovers. You are not a lone voice, but one of tens of thousands of Welsh people who care passionately about our natural environment, and your voice is important. Join us in speaking up loud and clear for birds and wildlife in Wales by telling Welsh Government to include action for nature in the Nature Recovery Plan.

You can do this by sending a letter in response to the public consultation open right now. Email or post your letter to Welsh Government **by Wednesday 3 December** to biodiversity@wales.gsi.gov.uk or Biodiversity and Nature Conservation Branch, Rhodfa Padarn, Llanbadarn Fawr, Aberystwyth, Ceredigion, SY23 3UR.

To help you, here are four points you may like to include in your letter:

- **We need a fully funded plan of action that meets nature's needs.** Welsh Government thinks our wildlife will recover because a new approach called "Natural

Resource Management" will integrate policies and plans to change the way people work across the environment in Wales. This process may go some way to help, but on its own it is not enough.

- **Improving our network of special places and most threatened and precious wildlife is essential.** We need Welsh Government to invest in restoring our special sites and priority species and habitats. Our sites must be bigger, better and more connected and our threatened and precious wildlife restored. Commitment to improving these crucial nature conservation tools in the Nature Recovery Plan is essential.
- **Investment in scientific evidence is essential.** We need to be able to see what's working and what's not – monitoring the condition of sites and trends for a full range of species and habitats is essential. This helps us see nature's needs and ensures we're using the right tools for the job. We can't restore the nature we've lost if we can't see what we're doing.
- **Welsh Government must show strong leadership and ambition by making it law to achieve nature's recovery.** We need the Environment (Wales) Bill to enshrine in law long-term legally binding targets that promise to reverse declines in nature. We need the law to also declare it a duty of all public bodies "to further the conservation and enhancement of biodiversity" in their activities. This will give nature recovery the power it needs to succeed.

Please help us monitor the progress of our campaign – email or post a copy of your letter to Heather Galliford, Conservation Officer (Policy and Campaigns) at campaigns.wales@rspb.org.uk or RSPB Cymru, Sutherland House, Castlebridge, Cowbridge Road East, Cardiff, CF11 9AB.

Thank you for joining us to make a difference and speak up for nature.