

Consultation on the Nature Recovery Plan in Wales

10 September 2014 - 3 December 2014

Consultation Responses 101 – 115

Ref. 101 - National Parks Wales

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?

- NPW broadly welcomes the draft NRP's ambition. We suggest that the ambition will need to be supported by detailed actions, targets and timetables in order to achieve headline goals such as the Aichi targets. The structure of the NRP (e.g. habitat and species outcomes, ecosystem functioning, trends in impacts affecting these) should inform reporting and therefore allow WG and stakeholders to determine the rate of progress towards those targets. These components are essential if the NRP is to become the roadmap whereby international targets are to be achieved regionally, supporting local and national biodiversity action plans.
- The ambition includes the phrase "to reverse the decline of biodiversity", an ambition which National Parks Wales wholeheartedly supports. The ambition then moves into a statement of method. We suggest that it is not necessary to include a statement of method in the ambition, and that furthermore the method is limiting because it is incomplete. For these reasons we think this part of the ambition ("by...management.") should be removed. If a summary of method is to be included, it is suggested that it is more accurate for this (and consequent actions) to focus on reducing human impacts than on building resilience. Ecosystem health, however defined, is a function of natural processes and human impacts. The most controllable factor, by definition, is human impact. The phrase 'building resilience' requires definition.
- We suggest that the ambition statement, or a linked paragraph, could contain reference to the intrinsic value of biodiversity.
- Wales is rich in diverse examples of effective nature conservation. Within National Parks, examples include the Berwyn and Migneint LIFE Project, the Conserving the Park land management programme, and the Meithrin Mynydd Project. More widely, the network of terrestrial, freshwater and marine designated sites, national and local planning policies, and the application of regulatory frameworks (Strategic Environmental Assessment and Habitats Regulations Assessments), are evidence of a coherent and evolved approach to biodiversity

conservation.

- Nevertheless, Europe in general failed to achieve the 2010 biodiversity targets. The Nature Recovery Plan should set out the reasons for failure as they affect Wales and how they will be addressed. The National Ecosystem Assessment (NEA) identifies as the major driver of biological decline in the UK during the past 60 years. This impinges on conservation in the wider countryside, and the connectivity of designated sites, which will be key to meeting the 2020 targets. Other factors include air, soil and water pollution, inadequate support and complementarity around designated sites, invasive non-native species (INNS) and pathogens. The NRP could usefully highlight the anthropogenic source of all of these factors, identify limits of acceptable change and identify where these are exceeded already. The NRP should then set out clear plans to ameliorate each anthropogenic factor, alone and in combination, explaining how negative trends will be reversed.
- We suggest that the trends and issues identified in Annex 1 of the NRP would usefully inform the focus of action in Wales i.e. provide an outcome orientated, issues-based structure for the developed NRP. We suggest that the ecosystem approach can be applied at all levels, and crucially at the strategic level of the NRP. The Convention on Biological Diversity (CBD) principles can serve as high level performance indicators and/or as part of a screening process alongside Strategic Environmental Assessment and Habitats Regulations Assessment.
- We suggest that the NRP should highlight the particular role of smaller-scale mixed agriculture in rebuilding Wales' biodiversity, as part of local, circular economies which improve local environments and improve people's well-being. Common Agriculture Policy finance represents a closing window in terms of longer term support for agriculture in western Europe and we feel that now is the time to invest in land-based business, resilient, low-input farming and value chains for the future - an ecosystem approach for farming, linking resource conservation and food production to place and biodiversity. A similar case can be made for support for sustainable fishing and the significant marine and terrestrial wildlife component of Wales' visitor economy.
- We believe it would be helpful to set out where the NRP will sit relative to other WG strategic plans and the ways in which other plans will need to support the NRP. We believe the NRP will be able to help achieve WG's goals in relation to well-being and future generations, as conservation and sustainable resource management are intimately linked to health, outdoor recreation, food production, and access to resources/equity issues.
- NPW believes that National Parks and Areas of Outstanding Natural Beauty are key delivery areas for the ambition and for the ecosystem approach, with partnerships, mechanisms and action already in place. National parks and AONBs are Wales' only areas governed by statutory, integrated natural, cultural,

recreational and learning resource management plans.

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

- NPW suggests that the essential role of biodiversity should be emphasised more strongly; it is only by conserving and enhancing biodiversity that societal benefits from ecosystem goods and services will be achieved. Thus we recommend simplifying the statement as follows: “To reverse the decline in biodiversity.” Benefits to people would then be implicit in the statement.
- The NRP could usefully describe how Wales and UK and European partners will collaborate across administrative boundaries.
- The NRP correctly explains that many species and habitats have declined despite investment and effort. However we suggest that a key part of the revitalised approach needed to address will be to redouble efforts known to be effective and remove those factors which work against success.
- Key to recovery will be improved habitat buffering, transitions, and variability across the landscape commensurate with the ecological conditions associated with the geographical area.
- Reversing habitat fragmentation (the principal cause of decline, accelerated by the effects of climate change), will be achievable through the simple upscaling of tried and trusted methods, e.g., riparian buffer strips, field headlands and margins, ploughing along contours, cutting hedges at the right time of year, under-planting of crops, retention of fallow fields during winter etc., working with the grain of nature and within a farm holding’s carrying capacity. Added value will be achieved through reduced farm overheads, reduced runoff and pollution, higher quality produce, and, potentially, through increased employment within a more labour intensive, but environmentally less harmful, approach.
- There is potential confusion between the phrases ecological resistance and ecological resilience; perhaps these could be clarified.
- NPW wholeheartedly supports the ecosystem approach, existing conservation methods, mechanisms and processes are still integral to nature recovery. Therefore actions and targets must be based not only on retaining what is left, but also on expanding, connecting and enriching this, on land, in freshwater and in the marine and intertidal zones. We suggest that the CBD principles as performance indicators or screens for policy decisions, helping to eliminate or reduce conflicting policies.

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

- NPW supports the NRP goals in principle but, like the ambition, they should

be made more tangible by the addition of detailed actions, targets, timetables and indicative costings.

- The word 'goals' is used in different contexts within the document. To an extent this is because the goals are taken from a number of other documents, however it may be worth using another term for the intentions/mechanisms of the Nature Recovery Plan.
- Nature recovery could be expressed in terms of addressing the issues listed in Annex 1 and thereby moving towards the goals in Annex 2. The goals listed on pages 14 – 15 generally support this. However, the headings between p16-23 are confusing; actions and the justification for them appear under several groups of different headings. We suggest that the goals on p14-15 could be used as the headings for action. This would make it easier to see which actions are necessary and sufficient to achieve the goals.
- The goals need to be realistic about the scale of the challenge to restore Wales' biodiversity. For example, the Brecon Beacons National Park Authority has estimated that it will cost in the order of £800,000 to restore an area of approximately 60 ha of heavily eroded blanket bog in the Park. There are several hundred hectares of eroded peat in the Park, and this picture is multiplied several-fold across Wales. This is just one of many examples of the true cost of restoring habitats at scale in order to restore ecosystem function, and highlights the cost-effectiveness of preventing habitat loss.
- The goal "To improve degraded habitats at scale," includes the phrase "... make landscape-scale impacts on ecosystem services." We suggest simplifying this to, for example, "we will expand habitat and species management", with associated targets.
- The draft NRP refers to "less diverse habitats." We suggest that this should be reworded as there are several naturally less-diverse habitats e.g. acid grassland and dwarf shrub heath.
- We are unclear of the meaning of the phrase "restoring 15% of degraded ecosystems contributing to climate change mitigation?" We believe that ecological functions need to be maintained, but these will not be readily expressed as a percentage.
- NPW welcomes the goal "To address key negative factors of biodiversity loss and increase connectivity significantly". We suggest that this goal makes explicit reference to INNS or alternatively another goal is set for this.
- The text in support of the goal "To improve management of our highest quality environments," is confusing because it uses the words environment, systems, ecosystems, wider environment and high quality areas.

- NPW offers the following goals as alternatives or to supplement the existing ones:
 - o “More, bigger, better and connected”
 - o The Welsh economy is managed as a wholly-owned subsidiary of the environment;
 - o Obstacles to biodiversity conservation are reduced and eliminated;
 - o Wales’ biodiversity workforce and skills are expanded and improved;
 - o A clear set of biodiversity conservation (and restoration) targets and actions are agreed and shared nationally and locally, building on, and expanding, existing and historic good practice;
 - o A clear and strong relationship is established between local biodiversity partnerships and the WBP and national experts;
 - o A local biodiversity skills framework is developed to utilise the added value available in the skills, knowledge and expertise invested in local partnerships;
 - o A national biodiversity data management plan is implemented, run by Local Records Centres Wales;
 - o The public policy initiatives and decisions that conflict with biodiversity conservation will be clearly identified and an action plan implemented to amend them;
 - o A clear set of public engagement targets and actions are agreed and shared nationally and locally;
 - o Targets are set for annual increases in investment in biodiversity conservation across public, NGO, voluntary and private sectors; and
 - o A governance competency framework is agreed across Welsh Government portfolios, also applicable to local government and privatised utilities, to provide a common sense of purpose and strengthen how decision-makers work together to achieve biodiversity conservation.
- It may be possible for LBAPs to be aligned with natural resource planning areas, although it is accepted that the latter will not necessarily provide a definitive biogeography and that it may not be desirable to alter local LBAP partnership areas and create less wieldy partnerships.
- We suggest that for protected sites, a goal is to expand them and to join them up by establishing complementary management between them. This need not adversely affect existing land uses. We urge caution in stating that the diversity

encapsulated in protected sites should “maintain the ability of ecosystems to adapt to whatever disturbance is applied to them.” Current protected sites were not identified or designated in order to support ecosystems but to provide the best examples of their type. The SSSI selection criteria consider ‘ecological coherence’ in terms of the functional role that SSSIs play within a network of sites, but this will apply the designation of future sites and, in retrospect of the previously designated sites, filling the gaps where these do not achieve this functional role. The Joint Nature Conservation Committee’s (JNCC) current revision of the “Guidelines for the Selection of [Biological] SSSIs” is scheduled for completion by 2017. The NRP could usefully refer to this work.

- The NRP implies that because of the pressure that the wider countryside is under to provide other goods and services, it cannot deliver high ecological value. However, until they were designated, all protected sites were part of the wider countryside, demonstrating that it does provide high ecological value. Furthermore, protected sites are designated from a suite of similar sites, all of which are deemed to be of national importance but only the very best of which are ever designated. There are, therefore, other nationally important sites in the wider countryside but they were not designated as such, further emphasising the fact that high ecological value exists there. In any case, we suggest that improving ecological management and value in the wider countryside does not require wholesale changes and is essential to nature recovery. It generally implies extensification rather than intensification, working with rather than against the grain of nature and striving to put something back. Simple but effective measures include minimum widths for headlands and buffer strips, only ploughing along contours, retention of topsoil and soil nutrients and elimination of INNS.
- NPW welcomes the explicit inclusion of the marine environment in the scope of the NRP, and the acknowledgment of the richness of marine life and seabed habitats around Wales. We also welcome the explicit acknowledgement of the need to contribute to an ecologically coherent network of marine protected areas, ensuring that these areas are well managed, and the goal of achieving Good Environmental Status to meet the requirements of the Marine Strategy Framework Directive. We note that the NRP will need to align with the Welsh Marine Plan - or perhaps vice versa - which in turn must be in alignment with the UK high level objectives for the marine environment.
- The Management Schemes for European Marine Sites, and the statutory Relevant Authority Groups which help deliver the schemes, are a key delivery mechanism for biodiversity conservation in the marine environment. The approach helps to ensure compliance with European Directives on habitats and on the protection of birds, and for achieving the UK’s vision of clean, healthy, safe, productive and biologically diverse oceans and seas. It is essential that the progress made through the Relevant Authority Group/support officer model is continued.

Officers of Pembrokeshire Coast National Park Authority have also submitted comments on the NRP as a member of the Carmarthen Bay and Estuaries European Marine Sites Relevant Authorities Group.

4. Are the actions proposed right and adequate?

- NPW feels that this area needs considerably more detail, and that detailed consultation with stakeholders on an action plan would assist Welsh Government. LBAPs offer a wealth of reasoned, researched and (subject to resourcing) deliverable actions. Taken in the round, these will provide a good idea of where action is sufficient, where more is required and where qualitatively different approaches are required (i.e. gaps where the NRP can propose new workstreams and resourcing). The NRP can help provide a collaborative working environment for all LBAP and land management stakeholders (most conservation and restoration work takes place on private land).
- We suggest that biodiversity is not a “cross-cutting issue,”; rather, it is the factors that affect biodiversity that are the issue.
- We suggest amending the phrase “biodiversity conservation is an integral part of natural resources management...” for clarity.
- We suggest that an action is developed for long term and convincing public engagement and support in and for biodiversity conservation, working through local biodiversity partnerships.

Putting in place effective natural resource management

- NPW welcomes the idea of enhancing nature as a core element of local well-being plans. We suggest that the simplest way to achieve this would be to strengthen the duty under Section 40 of the NERC Act 2006, from the current have regard to biodiversity conservation, to take active steps to conserve biodiversity and that this amendment should be achieved using the Environment Bill.
- The NRP could helpfully provide clarity on how favourable conservation status will be delivered.

Facilitating cross-sector policy integration

- NPW welcomes this in principle. However it is not clear why, given the stated aim of embedding the ecosystem approach across government, natural resource management and marine planning and the Environment Bill will only have an indirect influence on economic development, transport and energy, whereas there will be direct engagement in health and education. Identifying any conflicting policies and programmes that undermine biodiversity is essential.

Funding our partners

- NPW is reassured to see this topic addressed. We would welcome further clarity on how WG will ensure a long term commitment to schemes that are fit for purpose and delivering. Continuity in delivery of LBAPs and sites management schemes and plans for UK and European sites is essential.
- We would be pleased if the RDP were to be a significant “vehicle for integrating nature into practice on the ground.” However, this will require active engagement between RDP scheme delivery bodies and local biodiversity partnerships/conservation management organisations. National park authorities and AONB administrations are purpose-designed integrated landscape management organisations. We would be delighted to help in design and delivery of conservation-orientated RDP schemes. One useful area to test we suggest is that of workable payments for ecosystem services (PES) schemes, together with development of knowledge and understanding about biodiversity conservation and a growing conservation and ecological work force.

Identifying financial instruments

- We suggest that effective use can be made of agri-environment schemes by deploying them as venture capital loans for farmers and other landowners to develop and implement PES business plans. The loans can be recouped and then re-deployed elsewhere whilst the PES grow and attract new private investment and consumer interest, providing added value to Wales.
- We broadly welcome the PES and green growth proposals and would welcome the opportunity to work with the WG to develop these further. We believe that a parallel plan is required to raise public awareness of ecosystem goods and services, in particular in relation to water and renewable energy. The well-being agenda can be used to achieve this.
- We suggest that the phrase “investment to increase habitat or species resilience that could form a basis for the development of schemes to receive funding to offset dispersed impacts from individual development plans, or the potential to trade emissions within capped limits” needs clarification. NPW strongly opposes any form of biodiversity offsetting, which we believe is at odds with the ecosystem approach and is not ecologically effective but highly damaging overall.
- NPW welcomes the challenge funding that WG has been available in recent years (the Ecosystem Resilience and Diversity Fund, the Resilient Ecosystem Fund, the Nature Fund) and we urge WG to develop longer-term finance schemes that are unconstrained by financial year-ends in order for ecosystem approach based projects to be better explored.

Reviewing designated sites and species

- We have commented on this above.

Monitoring and reviewing regulatory instruments

- The NRP could usefully explain what powers NRW may need to achieve the integrated management approach and how existing and potential policy conflicts that undermine biodiversity conservation will be identified, ameliorated and eliminated.

Improve the evidence base: research, monitoring and surveillance

- NPW welcomes this intention and believes that habitats and species condition assessments can serve as indicators for the ecological functions for which they are identified. We believe that the species and habitat indicators used to inform the State of Nature Report should also be used locally, so that local surveillance and monitoring can feed into a national picture; this would be a useful means of collaboration with LBAPs and of growing the skills base.
- A Strategic Research Partnership has been established between the Brecon Beacons National Park Authority and Cardiff University's PLACE (Sustainable Places Research Institute). This partnership is developing projects to fill the evidence gaps in biodiversity conservation (WBP Evidence Gaps Project) and to improve the understanding of the State of the Park through original research, surveillance and monitoring. We believe that this is an example of the sort of long term commitment and investment that is required for surveillance and monitoring and growing the skills base.
- It would be fruitful for the NRP to relate to the WBP's Evidence Gaps Project and Local Records Centres (LRCs). We are not clear how the developing Information Hub will collaborate with and complement the work of LRCs. LRCs have a unique position in Wales, supporting and being supported by an army of local naturalists and county recorders who give time and share data free of charge.
- We seek clarification on how the WG intends to use "Nature Fund projects to develop monitoring and evaluation of the multiple benefits of landscape-scale interventions." We hope that this means that WG intends to invest for the long term in these partnership projects.

Encouraging effective communication and engagement

- We believe that the existing good work that happens already through WG, conservation organisations, local government, national park authorities, local biodiversity partnerships and individuals (including volunteers) provides a sound basis for engagement. For example, the Brecon Beacons and Pembrokeshire Coast National Park Authorities recently launched a three year, £900,000 Skills in Action project, funded by the Heritage Lottery Fund. This provides land-based skills apprenticeships and professional qualifications to a number of trainees each year. Brecon Beacons NPA has also sought NRW Partnership funding to create a full time

Volunteers Development Officer (currently a part-time role) and an Assistant Ecologist (monitoring) to develop citizen-science-led monitoring projects.

Providing better governance to benefit nature

- NPW would welcome more clarity on these proposals. Governance and buy-in may be the most critical success factor for the NRP and establishing the ecosystem approach across government.
- We suggest that a competency framework is developed.
- In view of financial constraints, localised, bottom-up partnerships and financial availability and continuity must be developed to support action. It would be helpful if the NRP could describe options for drawing down EU structural funding to conserve biodiversity at scale.
- We offer the following suggestions for priority areas for the WBP during the next 10 years:
 - o Building the level of practical action underway
 - o Biodiversity Evidence Gap project
 - o Increasing the revenue spend available
 - o Building the workforce and expertise
 - o Building the level of surveillance and monitoring
 - o Working closely with Local Records Centres Wales
 - o Building and supporting the volunteer work force
 - o Re-vitalising LBAPs
 - o Providing national support for LBAPs

5. What additional action would you wish to see?

- We suggest that the WBP should compare the range of local and national biodiversity actions and the issues listed in Annex 1, asking the questions “what is covered?” and “what is missing?” The Nature Recovery Plan could then help to address strategic and/or locally-intractable gaps.
- The Review of Protected Landscapes in Wales, amongst other initiatives, coupled with the NRP, the Environment Bill, the Well-Being and Future Generations Bill and the Welsh National Marine Plan offer the tools for delivery of the NRP in a comprehensive, integrated and path-finding manner in protected landscapes. We suggest that the NRP includes specific measures in this regard, with the potential to

draw on RDP finance to assist delivery.

- As an example of the opportunities available in National Parks, the Brecon Beacons NP provides up to 90% of Cardiff's and over 70% of Swansea's drinking water (Usk and Taf catchments, Tawe catchment, respectively; Dŵr Cymru Welsh Water figures). As a nation, Wales is predicted to experience water deficits within the next 30 to 40 years. There is therefore a strategic imperative to use landscape management to safeguard Wales' strategically important water supplies within Brecon Beacons National Park, principally through upland blanket bog restoration, woodland expansion and wetland restoration. Such actions could also help to restore ecosystem functions such as nutrient retention, carbon sequestration and infiltration, thereby benefiting wetland biodiversity and farm and community economic resilience (reduced nutrient and water pressures, hydro-electricity potential). To improve the resilience of this sort of work, the WG would in turn need to address the negative influences on biodiversity conservation and water management, be they agricultural or, interestingly, marine pollution-related. Applying the ecosystem approach in this way in a protected landscape illustrates the modern and relevant role that they should play, provided they are given the enhanced powers and resources to do so.

- NPW welcomes the recognition of the successes achieved through the protected sites network and that these sites will continue to play an integral and essential role in biodiversity conservation.

- However, while we see a benefit in identifying popular 'flagship' species to galvanise public interest, we do not agree with identifying "priority species or habitats that society wishes specifically to see benefit from improvements to our ecosystems." Neglecting some habitats and species to favour popular ones would undermine the principles of the ecosystem approach. Instead we suggest focusing on public engagement and understanding, which local biodiversity partnerships can lead on, and through a stronger biodiversity conservation focus in education.

- We suggest that the green growth agenda includes an action plan for ecological skills development in the work force, working with academia and public, non-governmental organisations, voluntary and private sector delivery partners to grow the work force. There is a growing deficit of ecological knowhow ranging from natural history and taxonomic skills to site management, surveillance and monitoring. A principal beneficiary of a larger work force could be the farming industry, where these skills are grown from within the industry (e.g., through relevant RDP schemes).

- With the emphasis in the EU on green infrastructure, and, following the publication of the Countryside Council for Wales' standards for accessible natural greenspace provision, we suggest that these standards are included in Planning Policy Wales.

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

- The National Ecosystem Assessment identifies the most effective ecosystem recovery scenario as having a strong regulatory underpinning. NPW supports such a scenario, believing that it can stimulate innovation and efficiency in natural resource use within a (sustainable) space defined by regulatory boundaries. However, regulation must be enforced, and penalties must be meaningful, otherwise they are simply accommodated as a cost of doing business.
- We suggest that there will be scope for targeted PES schemes, but that the beneficiaries of many of the goods provided by sustainable farming, fishing, development, energy and tourism are widely distributed and consequently that UK government and WG will retain key roles in terms of distributing public funds and in terms of regulation. We need to be aware of the risk, and perhaps likelihood, that PES schemes will only ever have a limited take up, for a variety of reasons; and that perhaps, therefore, innovation and investment needs to be driven by clear, fair regulation, and incentives, rather than over-reliance on market forces.
- We recommend that the WG or NRW undertakes a review or ‘meta-review’ of existing effective PES schemes and/or added value schemes, e.g. business benefits of the red kite recovery in Wales.

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

- We suggest above that the NERC Act duty to “have regard to” biodiversity conservation should be strengthened and that the Environment Bill provides the opportunity to make this change.
- Local biodiversity partnerships are already the key delivery partnerships and deserve more support. To help them, WG has a role in bridging the gap with the farming and land owning sectors, not least of all by ensuring that its agricultural programme advisors and negotiators (e.g., Farming Connect, Commons Development Officers, Glastir Contract Managers, and Farm Business Advisors) collaborate with local biodiversity partnerships and LRCs to ensure that publicly funded schemes help to deliver local targets. WG’s programmes can lead by example, e.g. gearing RDP programmes to deliver local biodiversity and National Park and AONB Management Plan objectives.
- WG support for local partnerships could include providing longer term funding streams (3-5 years plus) and provision of innovation funding for biodiversity partnerships. Programmes also need to be geared to help local partnerships to continue and to build upon existing successes, rather than be forced to invent new projects when what is required is often mainstreaming not innovation. Rather than create new schemes, it would also be appropriate to channel new revenue through existing financial measures, such as the Sustainable Development Funds run by

NPAs and AONBs, as well as through organisations like the Heritage Lottery Fund. The WG's policy position for national parks as test beds for rural development is very welcome and implies a delivery role for NPAs in terms of RDP finance.

- The ecosystem approach, working at appropriate scales, means that outcomes will not fit with political cycles. Ecosystem-led projects, or rather programmes, require a long time, over several political cycles, to deliver measurable outcomes. While ecological outcomes might be slow, other socio-economic benefits will be visible, through employment, skills acquisition, added value businesses, public awareness and understanding of the work carried out. For example, the Rhododendron eradication programme in the Snowdonia NP is long term, having started in the Maentwrog NNR during the 1970s. To date, 5,500 ha have been controlled or brought into management agreements, at an estimated cost of ca. £4 million. This is essential, ongoing work which is successful, provides employment and adds value (e.g. biochar), as well as immediate landscape change but longer term biodiversity improvements.
- We recommend that WG uses the RDP and Business Wales to align with existing and new businesses that develop in response to habitat management and restoration.

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

- NPW has provided some suggestions under Q7.
- Local and national biodiversity outcomes might also be reported in terms of benefits to Well-Being and Future Generations.
- Local biodiversity partnerships rely and benefit strongly from local volunteer groups, who are recruited, trained and supported by their lead organisations. This pays dividends to the lead organisations through monetary return on investment and health, well-being and social capital for participants. We suggest that the NRP action plan includes actions to strengthen and integrate this support, so that lead organisations collaborate and share their skills.
- For reasons explained under Q4, improve the evidence base, we strongly suggest that WG provides financial assistance to Local Records Centres.
- The Review of Protected Landscapes in Wales is examining the statutory purposes of these landscapes and how they might collaborate more. This presents WG with a great opportunity to improve and strengthen the biodiversity conservation and ecosystem resilience within these landscapes, thereby achieving benefits over a quarter of Wales' area. With reference to working better together (Q7), NPAs already collaborate very well with regional and local stakeholders, e.g. through local biodiversity partnerships, Raglen Tir Eryri, the Pembrokeshire Grazing Network, Rural Alliances, The Green Valleys, Community Council Charter, Glastir Common

Land Scheme successes, National Park Ambassador schemes, Dark Skies Reserve, Strategic Research Partnership, the Biodiversity Business Fayre (Snowdonia), and the Sustainable Development Funds.

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

- NPW suggests that duplication is not necessarily a bad thing, in fact there are positive elements to duplication, for example the multiplication of good practice, and delivery partners routinely share this. Consequently, we believe that growing the conservation work force is an essential element to success.
- Eliminating policy conflicts and poor practice will also be essential.
- Longer term funding streams will help to reduce the duplication in project development and management (economies of scale), as will building on successful projects and programmes rather than having to build new ones. The WG could develop subsequent funding streams as guarantee schemes for other funding streams, where projects that come to an end are provided with bridging support to provide time for subsequent funding to be found; not all projects can be ‘floated’ into the market once initial finance ends. The WG could also ensure, through for example the RDP, that successful projects benefit from complementarity and absorption into good agricultural and environmental practice.

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

- We have commented previously on the very valuable role of Local Records Centres, their unique working relationships with county recorders and the innovative products and services they have developed. A centralised data hub would be useful to most organisations but we are not clear how this would differ from the National Biodiversity Network. It would be useful to somehow regularise the proliferation of smart phone apps for species identification, in particular ensuring that records get back to LRCs rather than just to the app providers.
- We suggest that the NRP should contain additional focus on the essential role of surveillance and monitoring. There is a multitude of national recording schemes, which Wales might use to provide national and regional ‘state of nature’ summaries.
- For the Information Hub, data must be geo-referenced and disaggregated on a range of boundaries, including unitary authorities, protected landscapes, catchments and broad habitat types.
- We suggest that the Strategic Research Partnership established between Cardiff University and the Brecon Beacons National Park Authority, described previously, is one example of a proactive approach to data acquisition.

- We also refer again to the decline in the Welsh, and British skills base, of taxonomic and natural history skills as the bed rock of biodiversity conservation. This must be reversed if the ecosystems approach is to be realised. We recommend that the NRP action plan includes targets for growing the skills base in this regard.

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?

- We support the proposed statutory State of Natural Resources report. It would also be very helpful if regular bulletins on the NEA updates were provided
- We have previously suggested that the 12 ecosystem approach principles should be used as performance indicators and these can be applied at a variety of societal scales.
- Suggestions made above on surveillance and monitoring are relevant to this question too.

12. We have asked a number of specific questions. Please let us know if you think there are related issues which we have not specifically addressed, and provide further information.

- We suggest that the NRP would benefit from clearer and more consistent language. A variety of terms is used (goals, aims, targets; natural resource management, ecosystem approach, resilience etc). It would be helpful if these could be used more consistently.
- We feel that clarity could be provided on monitoring ecosystem function (e.g. nutrient cycling, decomposition, the functional role of species, succession stages, dispersal, migration etc.). It may also be simpler to rely on existing measures of the components of ecosystems such as assessments of habitat condition and conservation status, with additional metrics drawn from e.g., river flow, meteorology and the Environmental Change Network. These can then be pooled to provide a measure of ecosystem function(s). This would be an effective proxy for inherently dynamic systems.

National Parks Wales is grateful for this opportunity to comment.

Ref. 102 - Alec Dauncey

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?

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

Delete: “by focusing on effective natural resource management.” It is a “means” not part of an ambition, you did not use it in question 1.

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

Mostly, but: “achieve ‘no net loss’ of biodiversity” is unambitious and illogical in the context of a Nature Recovery Plan. It would amount to a “nature stability plan”.

I propose: “achieve a net recovery of biodiversity”, more consistent.

4. Are the actions proposed right and adequate?

5. What additional action would you wish to see?

Add: “Using natural processes of biodiversity recovery.”

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

Cut their costs. Use deregulation of farming and forestry to allow natural processes of recovery where possible.

This should be linked to the Aichi Targets:

3. “By 2020, at the latest, incentives, including subsidies, harmful to biodiversity are eliminated, phased out or reformed in order to minimize or avoid negative impacts,”

7: “By 2020 areas under agriculture, aquaculture and forestry are managed sustainably, ensuring conservation of biodiversity.”

Common Agricultural Policy requirements to maintain agricultural use and grazing may be harmful to natural cost free recovery of nature by free market choices of farmers to extensify and allow relative land abandonment, where biodiversity can “recover” naturally at no cost to the business or taxpayer.

Scrub succession on less-grazed agricultural land meets woodland creation targets without expenditure.

Imposing costly restocking obligations on forestry businesses for felled forestry areas may not aid nature recovery.

The biodiversity “recovery” value of forestry subsidies for exotic conifer forestry should be subjected to scrutiny, including NRW expenditure on further conifer forestry investment on the public estate.

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

Good transparent ministerial responsibility for the actions of NRW will be important.

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

It will be particularly important to ensure NRW expenditure and potential win-win savings have a focus on “Nature Recovery”:

- There may be a case for cost saving managed retreat and new wetland creation.
- There may be a case for yielding current income from coniferous felling without costly restocking with conifers.
- Greater use of close-to-nature forestry might be a financial and biodiversity win-win.

Wales Audit Office should be asked to examine some of these issues with rigour.

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?

Good statistical reporting rather than glossy reports.

Ref. 103 - Game and Wildlife Conservation Trust

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?

We totally agree with the focus of the ambition and although the words in this consultation conveys what is needed we believe that following the State of Nature report in 2013, some species that has declined dramatically needs a huge focus by everyone concerned if they are ever to come back in the numbers needed to sustain themselves. The rural environment of Britain is very largely man-made shaped by generations of private sector farmers and other land managers. The days of single activity funded projects looking at one particular concern are over so we have to focus together on the joint objective. One collaborative scheme that encompasses all of the issues involved in Nature Recovery has to be taken into account and there has to be buy-in from all relevant Government departments and all single body organisations. Nature knows no boundaries therefore action has to be of a landscape scale so that corridors are continuous. It must also be mentioned that the only way to protect the considerable bank of improved grassland which is so important to water quality, carbon sequestration and the landscape is making sure we have a resilient livestock sector. Without farming, society and nature are in

trouble. We must recognise that nature needs the care of both, so engaging private land managers is key.

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

Although having a new approach sounds positive the £6m Nature Fund created in response to the State of Nature report last July has been so late in its announcement leaving very little time for the work of the ground to produce positive outcomes in the time scale provided. If WG is determined to have a new approach it must remember that the work has to be done in the different seasons. There has to be flexibility when working with nature and a reasonable expectation in delivery of outcomes when strict deadlines are issued. If we are to keep everyone enthused we have to be realistic and fair. Wales is changing the way farmers are paid moving from headage to area basis. This will change the landscape immediately. We reiterate that the landscape in Wales is man-made shaped by generations of private sector farmers and other land managers. Nature needs farming and mobilising private land managers is key.

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

The goals are correct but the direction of travel depends on a lot of joined up thinking with everyone involved in the Environment. If we want our environment to be more resilient we need everyone around the table to agree the objectives from the outset and to look at the bigger picture of the importance of this task and we must not underestimate the importance of ensuring a resilient livestock sector. Habitats and species are declining; land use is changing increasing pollution along with climate change and invasive species. There are many different government departments dealing with these sectors on an individual basis. Protecting isolated areas needs a different approach. A bottom-up collaboration of upland owners, local graziers and stakeholders with a team of experienced technical advisors working with NRW in co-production is critical to deliver positive biodiversity outcomes. We must look at the wader population in the Berwyns compared with the Pennines and take note as to what is happening there.

4. Are the actions proposed right? What might be added?

We welcome the recognition that it is a complex issue which involves the appropriate mix of regulation, technology, financial investment, education as well as behavioural changes. GWCT is an evidence-based organisation that knows full well how to stop the decline of habitats and species identified but it believes that training will be a key requirement in Wales if there is to be any step change in the recovery of nature in Wales. With only four full time gamekeepers employed in the whole of Wales, there is a severe lack of skilled people who can actively manage the moors as required. The skills have been lost and the younger generation are not aware of

the importance that nature plays. NGOs and the private sector are very well versed on this and need to be mobilised. We are however pleased that this discussion document recognises that a coherent strategy is required to reverse the declines in biodiversity. The development of this strategy is crucial to delivery of incremental gain at all levels. The biggest challenge in this process will be

the development of a national framework of integrated targets relating to the full range of key themes which link together all the key strands of scientific evidence, policy and regulation.

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

Education at every level is key here, especially just how interconnected all these things are. The term 'ecosystem services' has been around for many years, yet its meaning is not widely understood. The same could be said for biodiversity which relies on moorland being managed much of which comes from private investment in other parts of the UK. The biggest impact will come when we can place a financial value on our natural resources (via green credits, offsetting or compensation schemes) that will create a viable market and give them greater attention to the financial world. We will need to ensure this approach is fully integrated with the development of overarching delivery targets.

There is a big knowledge exchange requirement in this process here to educate policy makers, politicians and the wider public before these values become embedded. There is also great merit in integrating the farmed environment back with its neighbouring built environment. Local level landscape projects, which may involve community-led/partnerships, who will represent agriculture, wildlife, the public and farmers help rebuild relationships and engender local ownership. We believe this type of approach will deliver more efficient delivery.

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

It is critical first and foremost that we positively engage with farmers and landowners at every step of this challenge and create a necklace of landscapes so that we all become connected. As well as upland owner's local graziers and stakeholders with a team of experienced technical advisors working with NRW in co-production is critical. This way more conversations take place throughout the neighbourhood and everyone can share in the success of a project. Schemes and payments must be agreed with farmers and landowners and clarity of schemes and how they work need to be better understood. Far too many temporary staff are involved in advising farmers in Wales who then have their contract ended after only a short term which means a new person comes in. Relationships between farmers and those advising them is a very special one that takes time and patience so that real trust can be formed which is no different to relationships with their bank managers and

accountants. Only then will progress be made. There is a huge amount of mistrust between farmers/landowners and Welsh Government. There has been far too many disappointing schemes that stop abruptly delivering nothing. Farmers and landowners feel blamed. It's time to use a truly bottom-up approach and get the industry to design the scheme needed to deliver the objective themselves. The people on the ground have the knowledge and the know how to reverse a lot of the declines that are taking place in the environment so they need to be better respected and allowed to take more of a leading role.

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

We have to trust each other in the first place and truly believe in the overall objective. It is not just farmers/landowners that are suspicious of NGO's and Government Departments. There is much to be done on real joined up thinking and honesty in what we truly believe is possible. We reiterate that this trust has to start at the bottom with the landowners and land managers doing the work on the ground. They have to believe in the scheme and be part of its design from the start.

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

Real clarity of schemes is needed. Glastir for example has no real guidance so there is suspicion surrounding it. Farmers/landowners can get penalised for not carrying out a function on their land maybe because of poor weather conditions. This is too restrictive and draconian and puts more people off from taking up schemes that are needed if desired outcomes are really wanted. Flexibility and being reasonable has to be implemented and having a long term person (advisor) assisting farmers in making these decisions are critical. Farmers/landowners need a friend in these situations that works with them and not against them. Schemes need to be positively engaging with landowners/managers. Training courses in Upland Game & Wildlife Recovery & Management also needs to be a priority.

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

Good news travels fast. As soon as good results are available there is no problem in spreading the word to the industry. Farmers/landowners get to know very quickly when someone is doing something good. We have a very effective Farming Connect Scheme in Wales that is respected and we have good journalists that understand all the issues. We need to brief them regularly as we adopt this new approach to Nature Recovery and keep everyone together. Keeping too many tracks on people could be conceived as burdensome and big brotherish.

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?

A big PR campaign could be adopted to really thrash out all the issues of our moorland and reminding people of their importance regarding water and air quality, carbon storage, climate change, alleviating flood risk etc. Why have we neglected such a wonderful National Asset knowing this? We welcome the profile that the Nature Fund has offered Wales. Very little was mentioned before. There are cases of abandoned moorland in Wales because of the lack of key economic drivers. There is now a great story to be told as action now begins. Let us all support it wholeheartedly.

12. We have asked a number of specific questions. Please let us know if you think there are related issues which we have not specially addressed.

Restoring lost habitats and wildlife starts with the collaboration of upland owners, local graziers and stakeholders with a team of experienced technical advisors working with NRW in co-production.

Ref. 106 - Frances Cattnach

The diversity and richness of nature in Wales is amazing and is a constant source of joy to many. However, nature is in trouble as we are continuing to see declines in the wonderful wildlife we have in Wales including both rare and common species.

Therefore, as a supporter of the Wildlife Trust, I am pleased that the Welsh Government is working towards a Nature Recovery Plan. However, I have some concerns that that the plan will not be as effective as it could be at halting the loss of nature and creating Living Landscapes and Living Seas.

Therefore, I would like to see:

- The intrinsic value of nature placed at the heart of the plan.
- The inclusion of a fully resourced action plan that will enable the recovery and to give greater recognition to species and habitat restoration and enhancement.
- The plan enabling the better management of our most precious sites including the Local Wildlife Site system. These sites need to be bigger, better and more connected.
- The restoration and enhancement of our seas.
- The recovery of nature to be requirement on all public bodies in Wales.

Thank you for giving me the opportunity to comment on this plan. I hope that you will consider my feedback.

Ref. 108 - Snowdonia Society

Cymdeithas Eryri the Snowdonia Society is a charity which has worked since 1967 to protect, enhance, and celebrate the special qualities of Snowdonia National Park.

We believe that Wales' National Parks represent established exemplars for 'integrated natural resource management'. National Parks have for some time taken the leading role in Nature Recovery with their unique combination of landscape-scale management plans, integration of development and conservation, and existing concentrations of surviving biodiversity hotspots. With more resources, rather than less, National Parks will help us to deliver the turnaround which is needed if we are to rebuild biodiversity - our life-support system.

National Parks can play a leadership role as delivery areas for the ecosystem approach. Already governed by integrated management plans, they are purpose-designed areas, with dedicated staff, that can, in partnership with others, deliver in accordance with the ecosystem approach.

We welcome the opportunity to contribute to the development of the Nature Recovery Plan, in the hope that it will become a functioning Biodiversity Strategy for Wales through the addition of specified actions, the necessary resources, and their implementation and evaluation.

We support the stated ambition for Nature Recovery, but believe that without actions, responsibilities, mechanisms, and resources this document is not yet a plan.

We provide below our suggestions for how the Plan can be strengthened.

1. Getting to the point

The Plan must emphasise that biodiversity is essential – that it is our life support system.

The Plan must spell out clearly the threats to Wales' biodiversity and set out clear plans to address these threats.

We will not meet existing biodiversity targets for 2020, and the Plan must state what Wales will achieve, and how.

The plan risks losing its way in generalities and therefore losing credibility. The document suffers from a reluctance to describe the problem in plain words. It reads at times like a manifesto, with a belief that the problem (continuing biodiversity decline) is best solved by changing the terminology used around it.

An ecosystem approach is most likely to be useful at a high strategic level. We

believe that it is better, and clearer, to focus effort on maintaining ecosystem function and measuring achievement for this through the management, condition and status of habitats and species, i.e., building on what we do already. This way, habitats and species serve as indicators of healthy ecosystem function.

2. Start from where we are.

Let the Nature Recovery Plan say it: the greatest challenge is how it will engage with agriculture and fisheries, on the ground and in the sea, to secure the biodiversity recovery. Agriculture and fisheries hold the key to any such recovery for the majority of terrestrial, freshwater and marine species and habitats, yet the word 'agriculture' appears only five times in this document, and several of those instances are references to the economic benefits generated by agricultural activities.

We think the Plan should address the fact that the current requirement on public bodies to 'have regard' for biodiversity is inadequate. The Plan must recognise the need for a requirement 'to foster biodiversity' in all relevant legislation and guidance. How will a Nature Recovery Plan succeed when it is envisaged as having only an 'indirect' influence relationship with major branches of Government such as Economic Development? This is setting the Plan up for failure.

There is a need to sharpen the confused thinking in the Plan regarding the conclusions that should be drawn from the failure to meet the 2010 targets and the continuing declines of biodiversity.

Let the Plan say clearly, and having said it move on: 'conventional' nature conservation has been a story of considerable and widespread successes and immense practical learning in the context of spectacular failures by consecutive governments to give it the resources, priority, political will, and cross-cutting legislative and policy support.

Let the Plan also say clearly that the evolved system of designations – SSSIs, SACs, NNRs, National Parks, etc - is the main reason that we still have any biodiversity left at all. There is evidence of confusion in this Plan on this point. The overwhelming failure has been in the lack of effective complementary measures to support biodiversity in the undesignated wider countryside. That is the opportunity which this Plan must seize with both hands.

2. Make best use of the resources we already have.

The Nature Recovery plan needs to recognise and embrace the achievements and the knowledge, data, and understanding which exist in statutory and non-statutory nature conservation. There seems to be a reluctance to engage with this vast and valuable inheritance.

The conservation community in Wales has:

- Decades of real-world experience of actual biodiversity management in Wales.
- World-class expertise in WBP, in Local Record Centres, in universities, in NRW's science teams, in conservation NGOs and in the biological recording community.
- Evolved and sophisticated integrated land management and conservation systems which already exist in National Parks, AONBs, SSSIs, SACs and NGO reserves.

Let us not, therefore, sweep away or reinvent any of this, but recognise its vital role in providing many of the cornerstones and building blocks of a Biodiversity Strategy and Action Plan.

The Plan needs to demonstrate clear and positive engagement with the existing opportunities:-

- Building on the existing suite of protected sites and organising a determined push to make them bigger, better and more connected.
- Clear commitment to expansion of the SSSI series, the most successful single tool we have for biodiversity conservation. We are concerned that the Plan makes no mention of the important opportunity offered by the SSSI criteria revision currently underway at JNCC.
- There are exciting opportunities for meaningful new alignments of tools and structures – for instance LBAPs could be aligned with the new NRW natural resource management areas.
- Well-constructed and well-implemented area-based RDP schemes (along the lines of the Snowdonia National Park Authority's Rhaglen Tir Eryri).
- Making full use across the board of the vast data resources and capabilities in the Local Record Centres network.
- Making full use of the world-class expertise in ecology, conservation and land management which is centred in and around WBP and the Ecosystem expert groupings.
- Making full use of the strong local networks which result from years of LBAP partnership development work.

3. Focus on biodiversity first, not economic gain

Recognition of the intrinsic value of nature is missing from the Plan. This needs to

be rectified.

The Plan would benefit from giving higher priority to species and habitat restoration and enhancement and building on (rather than ignoring) successes to date.

Current emphasis on economic value derived from nature must be balanced by recognition of non-economic or unmeasurable values, and by clear reference to the risks in applying arbitrary monetary values to specific elements of nature.

4. Public choice of conservation priorities.

There is repeated emphasis in the Plan, and rightly so, on the need to strengthen the evidence base and to improve monitoring so that natural resource management is science based.

This does not sit comfortably with the suggestion that we focus effort on 'priority species or habitat that society wishes specifically to see benefit from improvements to our ecosystems'.

The latter approach can only exacerbate the already entrenched situation where a small number of photogenic vertebrates are the target for the lion's share of resources.

There is no possibility of achieving meaningful biodiversity recovery targets if this idea is allowed to direct where our scarce resources are deployed.

Ref. 111 - Wildlife Trusts Wales

Thank you for giving Wildlife Trusts Wales the opportunity to comment on the Nature Recovery Plan for Wales. Our detailed comments are contained within Appendix 1 and are summarised below.

Why is this needed? As highlighted by the State of Nature report in 2013, nature is vanishing at an alarming rate. Despite Welsh, UK and international legislation and policy, we are continuing to see the loss of biodiversity and sharp declines in the favourable conservation status of many habitats, species and designated sites.

As biodiversity and nature is fundamental to our health, economy and quality of life, it is therefore essential that we take urgent action.

An ambitious vision is needed. We need to accelerate our efforts and think bigger, better and over a longer term. We need to re-connect the fragmented habitats in our towns and countryside in order to transform our landscape. To do this we need to be visionary and create a step-change in how we manage our environment. This will

require local as well as national leadership and increased resourcing.

Therefore, Wildlife Trusts Wales welcomes the Nature Recovery Plan (NRP) as part of Wales's response to the EU Biodiversity Strategy. However, we have a number of concerns and suggestions regarding specific aspects of the Plan. These are:

- Priority species and habitats should be central to NRP, otherwise the Plan will not succeed in protecting Wales's biodiversity. There is a lack of any mention of how we will protect rare species. If we do not continue to protect these species they will simply drift into extinction. The Plan seems to infer that by concentrating on protected sites this will stop the decline. This is not the case and we will need to continue to have specific site and species interventions outside of these areas to stop the loss of biodiversity. It must be remembered that as well as having a moral duty, we also have international obligations for certain habitats and species.
- We are concerned that this document places too much emphasis on economic and social rather than the intrinsic value of nature. This emphasis may lead to only habitats or species that are deemed to be of economic or social value being the subject of recovery efforts. We recommend that the social and economic value should not be at the heart of the NRP but in an accompanying Communications Plan.
- The NRP reads more like a strategy rather than an action plan to tackle the loss of biodiversity. It lacks detail on specific, on the ground, actions that are needed to recover nature. We recommend that a pro-active, funded and a Specific, Measurable, Achievable, Realistic, Time-Related (SMART) Delivery Plan is created to sit alongside the NRP.
- We agree with the principles set out rather than the ambition and goals as stated. The ambition and goals are weak and not as strongly worded as those within the Aichi Targets or EU Strategy. We would like to see the NRP use stronger language to promote the recovery of biodiversity e.g. 'restore, recreate and reconnect habitats and species at an appropriate scale'.
- It is unclear whether the NRP will be a statutory document integrated into the Wellbeing and Future Generations Bill, The Environment Bill and the Planning Bill, as well as existing legislation (e.g. NERC Act) and forthcoming policy (e.g. Wales National Marine Plan).
- The Environment (Wales) Bill should be used to strengthen the biodiversity duty (section 40) of the Natural Environment and Rural Communities (NERC) Act 2006.
- The decline of biodiversity is not because traditional conservation efforts have failed. This decline is partly due to the scale of the challenge, the failure to integrate nature conservation into other sectors, a lack of significant long-term

funding and the lack of leadership to gain the political momentum to tackle the issues causing the decline in biodiversity. Therefore, we recommend that traditional conservation approaches are recognised and continue as a key component of the NRP alongside the new but untried Natural Resource Management process.

- Nature conservation is successful when fully resourced and when adequately integrated into other plans and policies. As such, a significant obstacle to the implementation of the NRP will be the lack of funding. Related to this is the lack of capacity within statutory bodies, local authorities and non-statutory organisations. Therefore, we recommend that a Funding Strategy accompanies the NRP. The NRP should also highlight the need for greater capacity within organisations and a requirement that the NRP is integrated into all other ministerial portfolios.
- Protected site management is vital to sustain our natural resource base. Therefore, while we welcome the goals for Natura 2000 sites, we recommend that more emphasis is placed on our domestic sites. These include Sites of Special Scientific Interest (SSSI) and Local Wildlife Sites. We support the recommendations of the Lawton Report and believe that they must be implemented in Wales.
- We are concerned about the low importance within the NRP given to agriculture and the marine environment. We recommend that a section is devoted to the recovery of nature in these sectors.
- The recommendations of the Environment and Sustainability Committee's Inquiry into Biodiversity in Wales should be implemented.

The recovery of nature will require a strong leadership, clear and measurable actions and clarity as to whom is responsible for delivering the Plan. The NRP should give a clear remit to both NRW and Welsh Government to be Wales's environmental champions.

Once again, thank you for the opportunity to comment on this document.

Ref. 113 - British Dragonfly Society

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?

No, you need to include site and species specific management in the plan. Ecosystem resilience and bigger, better more together are all good approaches but rarer and specialist species and habitats will need to be managed carefully on top of

this.

Many organisations are carrying out projects delivering biodiversity conservation and collecting evidence and these need to be recognised and supported.

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

We believe that the plan should be more long term, perhaps to 2050?

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

The goals and their general principles are going in the right direction. They require more detail, for example targets, timescales, outcomes and indications of who may fulfil them. There should also be a goal delivering correct management and conservation of priority habitats and species (red data book and s42).

4. Are the actions proposed right and adequate?

You should fund for targets and milestones delivered and monitoring. Continued monitoring (and resources made available for this) is needed to determine the success of projects.

5. What additional action would you wish to see?

Site and species specific management for rare and fragmented habitats and species in needed to stop the decline in biodiversity.

Delivering for our natural environment needs adequate resources including funding. The current resources are insufficient to deliver all that is required to halt biodiversity loss. Many third sector organisations already deliver a lot for our environment but cannot afford to continue to do so; a loss of these will also be a loss of the many volunteers that they work with. Carefully planned and coordinated targets and payment for delivery of these targets would allow the continuation of delivery for the natural environment by the third sector and their volunteers.

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

As we are third sector, this answer has a third sector slant. WG should support its third sector partners who are expected to deliver many of the aspirations in the plan on depleting resources, funding to enable delivery of targets and milestones would allow continued delivery of targets.

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

Clear structure in the targets including stating who will (or may) deliver the work.

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?

Five years for detailed reporting (maybe 6 to tie in with section 17 reporting), perhaps reporting timing should be target specific. Annual feedback should be incorporated to resolve any issues and improve on plans.

It should be clear that some of the targets may take many years to achieve, longer than 3 or 5 years.

Ref. 114 - Pat Armstrong

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.

Improving our network of special places and most threatened and precious wildlife is vital. 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 absolutely vital

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.

Wales is loved the world over for its beautiful mountains and valleys, its fields and streams and rivers and woods and all the wildlife that lives in them – you must see that they are preserved for the next generations, or this generation and all future generations will mourn their loss – and will also mourn the loss of tourism too which is vital to our economy! We must see more action to save wildlife!

Consultation on The Nature Recovery Plan for Wales.

Mark Barber – mark.barber@arc-trust.org

Consultation Questions

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?

No, ARC do not agree with a focus on this ambition alone. To help nature recover in Wales the plan must focus on protecting and restoring our biodiversity for its own intrinsic sake as well as achieving our international obligations. This does not mean that we cannot recognise where healthy functioning ecosystems benefit Welsh communities.

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

The ambition statement should reflect the international and EU obligations on biodiversity, this should extend to 2050. The ambition should be based on the concept of 'Conservation Status'. The aim of the Habitats Directive is for the maintenance, or restoration of, the 'Favourable Conservation Status (FCS)' of habitats and species listed under the provisions of the directive. This concept could be applied to the suite of habitats and species considered to be important in Wales. The WG is reminded of duties under Regulation 9 (1) of the Conservation of Habitats and Species Regulations 2010, which requires compliance with the provisions of the Habitat's Directive.

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

The goals need to be more strategic, robust and clearer. There needs to be unambiguous references to the direct conservation of priority habitats and species.

4. Are the actions proposed right and adequate?

There needs to be more definite and well defined goals focused around actual nature conservation. ARC supports the focus on monitoring and surveillance, the National Amphibian and Reptile Recorders Scheme (NARRS) can provide the information required. The LBAP partnerships (and county council biodiversity staff who help run them) and citizen science schemes are essential for encouraging effective communication and engagement, they need to be supported and funded. WG needs to provide and help secure long term funding for nature conservation organisations and partnership projects.

5. What additional action would you wish to see?

Site and species specific management needs to remain at the heart of this plan. The review of designated sites needs to be extended to SSSIs and NNRs, but only to strengthen this network not weaken. Reinforce the duty under section 40 of the Natural Resources and Communities Act 2006. To achieve the aims of this plan nature





conservation, including NGOs, need to proper long term integrated funding.

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

A strategic steer to business from WG would be welcomed. One example would be business species and habitat champions supporting and funding the work of NGOs and partnerships.

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

Concrete joint partnership working with WG and long term funding for NGOs / partnerships.

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

Through Wales Environment Link and Wales Biodiversity Partnership. RDP, agriculture and health.

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

Integrated grant giving plan – WG, NRW and NGOs. Support for local record centres and BARS.

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

By utilising the Welsh local record centres and providing them with long term funding

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?

3/5 year work programme as minimum plus annual reviews.

12. We have asked a number of specific questions. Please let us know if you think there are related issues which we have not specifically addressed, and provide further information.

This document is a generally promising set of principles by which the WG wishes to develop a Biodiversity Strategy, rather than the actual plan. More species specific nature conservation is needed. What will the format of the NRP be?

It is easy to dismiss the nature conservation work that has taken place over the last few decades because we haven't halted the decline of species and habitats in Wales, but without it our ecosystems would have been in a far worse state and we were actually making headway. The approach was working and with more long term funding we could of and can make a difference.

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here:

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Gwent Wildlife Trust

Ymddiriedolaeth Natur Gwent



Response to the Welsh Government Nature Recovery Plan

About: Gwent Wildlife Trust (GWT) was established in 1963 and is a registered charity. With over 10,000 members, GWT aims to protect and enhance the wildlife of Gwent, and encourage public enjoyment and awareness of local wildlife for all with its vision of an environment rich in wildlife for everyone. We work to inspire people about the natural world and to encourage individual action for wildlife.

The Trust works across the unitary authorities of Monmouthshire, Torfaen, Blaenau Gwent, Caerphilly and Newport. It works in partnership with many voluntary and statutory organisations and is a member of Wildlife Trust Wales and the Royal Society of Wildlife Trusts.

Gwent Wildlife Trust is working to deliver a vision of a Living Landscape and Living Seas, where biodiversity is a valued part of our environment, and where wildlife flourishes in harmony with human activities. Our day to day work to achieve this includes maintaining and improving 27 nature reserves featuring a wide range of habitats and species; education of over 4000 school children each year; organising and running events, courses, walks and talks to connect people with wildlife; providing management advice and support to landowners; working with local authorities, LBAP partnerships and others to ensure better outcomes for local biodiversity.

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Summary

Gwent Wildlife Trust welcomes production of a Nature Recovery Plan, as there is an urgent need to address biodiversity declines. We are surrounded by nature in crisis, where pressures from development, intensive agriculture, pollution and climate change are eroding our wildlife, despite an increasing awareness of the positive impacts that biodiversity has on peoples everyday lives.

However, **we do not feel that this plan is sufficient to fulfil our European and International commitments to reverse biodiversity decline**, for the following reasons:

- **The plan is too vague.** It reads more like a strategy, and is lacking in any specific actions. It is unclear who the target audience is, how it relates to other plans and strategies, and what the next steps will be.
- **The plan fails to acknowledge the intrinsic value of biodiversity.** The main aim of the plan should be to reverse biodiversity decline by conserving it, not exploiting it. Taking the view that nature is to be exploited for the benefits it can deliver will only be counterproductive to the goal of reversing biodiversity decline.
- **The plan relies too heavily on Natural Resource Management.** Over-emphasis of an untested conservation strategy is very risky. There needs to be recognition that traditional conservation, focused on priority species and habitats can make a significant contribution to ecosystem resilience.
- **Biodiversity needs to be embedded across all government departments and public bodies.** In order for the plan to be successful, targets for conservation should be assigned to all government departments and public bodies, with subsequent penalties for failure. Only when biodiversity is mainstreamed and departments and public bodies accountable will nature recovery be possible.
- **The plan does not acknowledge existing partners and systems.** Local authorities, the third sector, the Welsh Biodiversity Partnership, Local Biodiversity Partnerships, Local Records Centres, and the general public are barely mentioned, yet delivery of the plan will rely heavily on these partners.
- **The plan lacks commitment to delivery on the ground.** There is very little actual commitment within the plan – many ‘actions’ merely identify opportunities, or list actions already taking place. As highlighted by the State of Nature reports, biodiversity is in crisis, and the Welsh Government needs to strengthen their commitment significantly if this is to be addressed.

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?

Whilst we support the commitment to reversing biodiversity decline, the EU and CBD visions both include concepts of valuing and conserving or protecting wildlife – the idea that we are guardians of nature is sadly lacking and the intrinsic value of biodiversity is lost. Taking the view that nature is to be exploited for the benefits it can deliver will only be counterproductive to the goal of reversing biodiversity decline.

The paragraph explaining the role of protected areas is not clear. Protected areas can act as 'safehouses' for certain species, and allow repopulation of areas, but they are not sufficient to maintain our biodiversity or ecosystem function. The idea that we can sacrifice the rest of the landscape as long as we maintain protected areas is entirely contrary to the concept of ecosystem resilience. We need to be focussed on increasing biodiversity and connectivity outside of protected areas and implementing the recommendations of the Lawton Review.

Natural resource management is held up as a 'silver bullet' that will restore our ecosystems. The reality is that this is a new, invented concept, which has barely been tested in the field, and has not yet yielded any results. Whilst we support the concepts of building resilience and addressing the whole ecosystem, we need to be wary of holding up natural resource management as the ultimate solution. 'Traditional' conservation that focuses on species and habitats has a proven track record of success and will be needed to complement natural resource management. The Nature Recovery Plan needs to acknowledge that different approaches may be needed in different circumstances, and 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 statement needs to include reference to the intrinsic value of biodiversity, so that the main focus is reversing biodiversity decline by conserving it, not exploiting it. It should align more closely with the CDB and EUBS visions, which are much stronger.

The statement needs to be time limited - by 2020 - in order to fulfil our EU and CBD obligations. Without a time limit, there is no impetus for action, and it is even more likely that we will fail to meet our European targets again.

It is unclear who this ambition belongs to – is it the Welsh Government, its associated bodies, such as Natural Resources Wales, or the wider Wales Biodiversity Partnership? As NRW are the key environmental body delivering natural resource management, it must be assumed that this is for them, but the urgent need to reverse biodiversity decline should be embedded across government, so that it can be reflected in policy and delivered across different work areas, from health to highways, as NRW cannot possibly hope to achieve this alone. The contribution of local government, the third sector and the public also need to be specified.

It would therefore be logical to utilise the existing resources of the Wales Biodiversity Partnership, who already recognise the need to restore biodiversity, and who are already actively delivering nature conservation on the ground. However, many LBAP partnerships and individual organisations

within will not identify with 'natural resource management' (even if that's what they're already doing). If this ambition statement is aimed at everyone working to preserve biodiversity and ecosystems in Wales, it needs to be a lot more inclusive.

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

We feel strongly that whilst we support the principles of the goals, they are too broad and vague. We are also extremely concerned that there is no time limit and no specific targets. It would also help if there were some examples of existing action or proposed actions such as policy changes, agri-environment etc. There is also no indication of who is ultimately responsible for achieving these goals.

To improve degraded habitats at scale – Whilst we support the principle of this goal, it is lacking any detail. Which habitats, which scale, how much improvement needs to be achieved? How is 'degraded' defined? There is a considerable difference between a meadow suffering from lack of management, which can be restored within a few years, and land that has historic contamination from mining. Ideally we want to restore entire river catchments, whole mountain tops and stretches of coastline. How will priorities be set, as to which areas are restored? Specific details are needed, as well as examples of the landscapes which need improvement, and the types of action needed to increase ecosystem resilience and deliver biodiversity recovery.

To address key negative factors of biodiversity loss and increase connectivity significantly - Whilst we support the principle of this goal, it is lacking any detail. Which factors will be addressed; how will connectivity be increased? It would be more logical to break this into two separate goals, as many negative factors and connectivity are often completely unrelated. Lack of connectivity and fragmentation are negative factors themselves, whereas there are issues such as pollution and invasive species that have nothing to do with connectivity.

To improve management of our highest quality environments – It is not clear whether this goal refers exclusively to protected sites, and at which level. Currently, we are failing to meet Objective 21 from the Wales Environment Strategy - only 32% of SSSIs assessed are in favourable condition, and more than half haven't even been assessed (SSSIs in Wales- Current state of knowledge report 2006-2006, CCW). The Nature Recovery Plan should take this opportunity to investigate the reasons we are failing to manage our best sites effectively, because to continue in the current vein will mean continuing failure.

As stated, less than half the SSSIs in Wales have been assessed in detail in recent times. There are also shortcomings in the monitoring system, whereby a site is judged to be in unfavourable condition depending on factors such as the presence or absence of a fence, rather than the biodiversity of the site, or indeed the condition of the features for which the site was designated.

The Nature Recovery Plan should commit to assessing the condition of protected sites on a scientific basis, and also commit resources to monitoring sites. Without an effective, properly resourced monitoring system in place, there will be no way to tell whether management has improved.

We do not believe that this goal will fulfil the Aichi target relating to the extent of protected areas. The document does not state how close we are currently to the Aichi target of 17% of terrestrial areas and 10% of coastal and marine areas within the protected sites system, but we assume that we are falling short. Therefore there is a need to continue to designate protected areas, as well as secure positive management.

To achieve 'no net loss' of biodiversity - We believe that this goal is inappropriate. Firstly, 'no net loss' is not enough to generate biodiversity recovery, as 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, so we should be looking to provide net biodiversity gain. This is already embedded in planning policy, within TAN 5 (2009). In order to support biodiversity recovery and resilient ecosystems, the Welsh Government needs to be promoting, supporting and resourcing action that delivers positive gains for wildlife and facilitates creation and restoration of habitats and species recovery.

Additionally, the ideas of 'net loss' or 'net gain' are themselves counterproductive, and we are deeply concerned that this relates to biodiversity offsetting. This implies that biodiversity is transferable, as if there could be some sort of balance sheet for nature where losses and gains could be totted up. The reality is that many habitats are irreplaceable, and that even where compensatory habitats can be created, they will take many years to be equivalent to the loss. If the Welsh Government intends to pursue biodiversity offsetting as a conservation measure, this should be subject to separate consultation.

We believe that this goal could be re-worded to focus on supporting positive biodiversity action, and to include a focus on species and habitats (i.e. Section 42 priorities) which is lacking elsewhere. For example: *'To deliver biodiversity gains through supporting positive nature conservation action across a wide range of priority habitats and species.'* This should be followed by examples and a list of priorities.

Finally, we do not believe that this addresses the 'mainstreaming' of biodiversity across government and society'. We support the *'need to integrate biodiversity into decision-making and increase societal awareness'* but this is not specifically reflected in the wording of the goal. Please refer to our recommended additions below.

To put in place a framework of governance to support delivery, working together across sectors and strengthening our collective evidence base. It is very concerning that this goal appears to indicate that such a framework doesn't already exist. Whilst we welcome government commitment to support delivery and strengthen the evidence base, it is worrying that the existing Wales Biodiversity Partnership is unacknowledged. The third sector already works in effective partnerships with local authorities, statutory bodies and businesses, through Local Biodiversity Partnerships or

otherwise. Whilst we welcome investment and improvement to the system, the Welsh Government needs to recognise and utilise systems already in place.

Suggested Additions

To increase biodiversity in areas outside of protected sites. 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, such as the local wildlife site system. This is particularly important for urban areas, where there are few protected sites, and where ironically, the need for green infrastructure with its associated health and educational benefits is greatest. Action to promote biodiversity and improve connectivity outside of protected areas will ultimately result in a more resilient environment. Specific actions are needed in the document and could include investment in the Wildlife Sites System, implementation of the Lawton Review recommendations, Glastir improvements, planning policy etc.

To aid species recovery. Although a focus on ecosystems and protected sites will help species recovery, it will not be enough to fulfil our commitments to protecting vulnerable and endangered species. A variety of specific actions, from policy and legislation to practical works, will be needed to ensure that declining species are saved from extinction. Specific species are often fundamental to ecosystem function; therefore species conservation needs to form a key part of any plan addressing ecosystem health and resilience.

To embed biodiversity recovery into all government departments at all levels. In order to integrate and mainstream biodiversity government sectors, there needs to be high level commitment to biodiversity recovery. 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 specific sub-targets on biodiversity, to ensure integration of the commitment to halt biodiversity loss.

To engage the public in biodiversity recovery - In order to mainstream biodiversity across society, there needs to be an element of public engagement and education. This is one area where Wales has been successful, as many people are interested in nature conservation, and many schools are involved in schemes such as Forest Schools and Eco Schools. We now need action to capitalise on this interest and turn it into action for biodiversity.

4. Are the actions proposed right and adequate?

The Focus for Action doesn't include action on the ground, unless implied in 'maintaining' habitats and species. It should be noted again, that maintaining current levels of biodiversity is insufficient to deliver resilient ecosystems. It is also very concerning that priority species and habitats are to be chosen by society, as if conservation was a public relations exercise. The CBD requires signatories to make decisions based on sound science, not popular culture.

Putting in place effective natural resource management

Please refer to our earlier comments on natural resource management in response to question 1. We are concerned that natural resource management is a new approach that will take considerable time before it yields results, and that 'traditional' conservation focused on species and habitats is being sidelined. We are also concerned that the focus on natural resources will lead to a damaging emphasis on maximising productivity from the environment, rather than a holistic focus that recognises the importance of biodiversity.

It is unclear as to how the National Natural Resource Policy and the State of Natural Resources Report will integrate with this plan. It appears that there will be considerable overlap and duplication, especially as this document appears to be more of a strategy than a plan. Will the National Natural Resources Policy actually be the action plan stemming from this document, or will the end result be two strategic documents, and subsequent action plans. There does not appear to be a clear flow from strategy to plan to action on the ground.

Delivering a Welsh National Marine Plan (WNMP)

Gwent Wildlife Trust supports production of a Welsh National Marine Plan (WNMP). It is important that the Nature Recovery Plan, and subsequent plans such as the National Natural Resource Policy and any action plans, take account of the WNMP to ensure integrated action. Land and sea are not discrete, and this needs to be recognised. Currently the WNMP is in the early stages of development, but it is lacking in biodiversity and conservation actions. There should not be an assumption that the National Marine Plan will include all of the issues and action needed to restore marine biodiversity. There is likely to be a need for marine biodiversity actions to be included within the action plan stemming from this document.

Facilitating Cross – sector policy integration

This strategic action 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 and 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. We support the recommendation from the Inquiry into Biodiversity (2011) that the NERC act be strengthened by new legislation placing '*a duty to support and promote biodiversity on relevant organisations*'.

Funding our partners

We welcome a review of WG and NRW funding - this should include a review of previous grants awarded and the success of the funded projects, so that the most effective funding models can be identified. We believe that the Nature Fund has not demonstrated an appetite for collaborative working. Collaborative working was in fact already happening through LBAPs and other existing

partnerships. Sadly, the Nature Fund, in its shortcomings, demonstrated: 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 ongoing work as well as new projects; and the need for funding to be allocated according to conservation priorities and value for money rather than on a first come first served, haphazard basis.

Whilst funding for partners is welcomed, it is clear that there also need to be 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.

Identifying financial instruments

Whilst investment is welcomed, the payment for ecosystem services approach needs to be treated with caution. Most businesses still do not '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.

Whilst the private sector should be seen as a potential source of income, payment for ecosystem services should also be investigated in the public sector. Significant beneficiaries of ecosystem services include local health boards and local education authorities. The Welsh Government needs to promote the positive outcomes for health and education arising from investment in biodiversity.

Reviewing designated sites and species; Monitoring and reviewing regulatory instruments

Gwent Wildlife Trust welcomes these reviews, 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 - these need to be upheld without compromise.

Improving the Evidence base: Research, Monitoring and Surveillance

We are in urgent need of effective research and monitoring and our evidence base is currently very poor. However, this action commits to very little other than reporting through SoNaRR, for which there are no details.

There is no mention of BARS or integrated reporting with other UK countries. There is no mention of the network of county recorders, species interest groups or the wealth of information within our Local Records Centres. More information is needed about what the Information Hub actually is and how it will be used – is it intended to replace BARS?

There needs to be stronger commitment to funding research, both new and ongoing projects. There also needs to be improved communication between conservationists and researchers, so they can inform each other's work.

In order for monitoring to be effective, several elements are needed. Firstly, information must be captured in a consistent way that encourages participation across all levels. Secondly, commitment to using the system must be secured from NRW, local authorities and larger NGOs. One reason for the ineffectiveness of BARS is that CCW and then NRW have not engaged with it. Lastly, there needs to be commitment and appropriate resources to review the data gathered and then take action on the ground.

Encouraging effective Communication and Engagement

We are deeply concerned that WG ignores the existing BAP system and the contribution it has made. This section describes opportunities and goals, but not any actual action. There is very little commitment to involve the wider public and no mention of ensuring that caring for biodiversity is embedded within formal education.

Providing better Governance to benefit nature

We are concerned that the Welsh Government intends to '*refresh the role of local biodiversity action and the responsibilities of public authorities in the context of implementing natural resource management legislation*'. It is unclear what this means, and shows a lack of understanding of local biodiversity partnerships. Public authorities will have new duties and responsibilities under the Environment Bill, but these cannot be applied to biodiversity partnerships as they are largely voluntary.

In order to achieve the CBD and EUBS goals, the Welsh Government needs to work with WBP and local biodiversity partnerships, by listening, supporting and providing resources. We are also concerned that the BAP system is becoming a top-down mandate rather than the grass roots system that was originally intended by the CBD. Successful LBAPs are those that respond to and act to meet local needs, not government policy. These partnerships are already delivering actions on the ground that contribute to the goals of this plan – therefore Welsh Government should be asking how they can support these local partnerships, rather than adding layers of bureaucracy.

Again, we are concerned that priorities are being set by popularity, rather than scientific evidence. Priorities should be set using the existing Section 42 list.

4 What additional action do you wish to see?

Improved Funding and Resources: Gwent Wildlife Trust would like to see funding that reflects the holistic nature of the ecosystem approach. This means that funding should be long term and for large scale projects that meet the goals of this plan. Funding should be awarded according to conservation priorities and value for money. We would also like to see continuation funding for projects with a track record of success.

Support for local authorities: We would like to see substantially improved support for ecologists and LBAP officers within local authorities. Too often, responsibility for adhering to National and European legislation, including the NERC duty, is falling to one overworked person. These positions

urgently need to be protected, and supported. Just as in Welsh Government, responsibility for biodiversity recovery and associated targets should be embedded across all local government departments.

Action outside of protected areas: It needs to be acknowledged that the biodiversity within our protected sites is insufficient to maintain healthy ecosystems. Therefore the biodiversity in both the wider countryside and urban areas needs to be recognised, conserved and enhanced. The green areas in towns and cities, for example, provide a wealth of ecosystem services, such as dust suppression, exactly where they are most needed. Protecting biodiversity beyond protected areas requires actions such as support for the Wildlife Sites System, agri-environment schemes that deliver on the ground conservation and advice and support for landowners and community groups.

Action focused on species and habitats: As already stated, the Nature Recovery Plan lacks focus on conserving species and habitats. This is concerning as sole reliance on the untested Natural Resource Management will not fulfil our European and International obligations. Traditional wildlife conservation, using the Section 42 lists, has an important role to play in ensuring biodiversity recovery, and subsequent ecosystem health.

Public engagement: As stated in question 3, the public needs to engage with conservation. Actions include embedding biodiversity messages within education, supporting relevant higher education courses, inspiring and informing the general public so that they are empowered to take action of their own. The area of gardens in Britain is thought to be larger than the area of nature reserves, so there is an untapped resource for biodiversity recovery.

Joined up policy and working practices: Government agencies and departments need to communicate and work together more effectively. For example, Glastir agreements should not conflict with SSSI management plans. This will ultimately result in savings for the government as there will be less duplication and better use of resources.

Support for action on the ground: As stated in response to question 4, there needs to be commitment to action on the ground, at the local and regional level. There needs to be a clear indication that this 'plan' (which is more like a strategy) will be followed by an action plan with SMART actions assigned to specific bodies.

Commitment and accountability from Welsh Government: The Inquiry into Biodiversity (2011) stated that *'For biodiversity loss to be addressed, the Welsh Government and its delivery bodies must take full ownership of the targets and accept responsibility for achieving them. More than anything else, it was the general failure on behalf of the Government and its agencies to accept responsibility for Wales having missed the targets that was of greatest concern.'* It is therefore incumbent on the Welsh Government to take ownership of this plan, and subsequent related plans, and be ultimately accountable for their implementation.

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

Local businesses will only support conservation work if they are engaged and informed of the benefits. There needs to be widespread education and promotion of biodiversity within the business

sector, using exemplar projects to demonstrate real business benefits. Businesses need either incentives to engage with the conservation agenda or penalties to enforce good practice.

6 How can we strengthen the way we work together?

Firstly, the Welsh Government needs to acknowledge that they cannot achieve these goals without the support of local authorities, local partnerships and the third sector. There need to be effective lines of communication and appropriate resourcing.

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

As above – resources need to be allocated to support the third sector, local authorities, local partnerships and NRW itself in such a way that delivers collaborative working. Communication must be improved between government, NRW and partners, and within government itself.

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

The Welsh Government needs to examine and engage with existing frameworks and tools (BAP, BARS and similar). There is no point in reinventing systems that are already effective. As above, communication must be improved between government, NRW and partners, and within government itself.

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

It is important that Local Records Centres are involved in any work to gather and disseminate biological data. We have not had any experience of giving or receiving data from the Hub so we are unable to comment.

10 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?

Work programs should be long term, in line with EUBS goals (i.e. to 2020). Reporting should be regular, but needs to be integrated with SoNaRR, and with reporting rounds for Europe/CBD, so that duplication of reporting is minimised. Reporting frequency may vary depending on the goals and actions.

12 We have asked a number of specific questions. Please let us know if you think there are related issues which we have not specifically addressed, and provide further information.

We are extremely disappointed that the 3rd sector is not acknowledged within this document. Having contributed to nature conservation in Wales for over 50 years ourselves, it seems odd that the Welsh Government would not want to use our considerable expertise. Whilst we are a part of local biodiversity partnerships, and have been recipients of Welsh Government funding, there is no direct recognition of our sector and the work that we do. Should the Welsh Government want our support in delivering these actions, we would like to see our expected role defined.

This being said, the roles of local authorities, community groups, the Wales Biodiversity Partnership, local biodiversity partnerships and government bodies other than NRW, are also absent. It is very unclear who this document is for, and who is expected to deliver these actions. It is unclear what the

status of this document is, and how it relates to previous plans, such as the Wales Environment Strategy, and future plans and legislation, such as the National Natural Resources Policy. It is also unclear what will happen next – will there be a detailed action plan? If so, who will contribute to it?

We are disappointed that there is no reference to the previous successes of the nature conservation movement in Wales. Although we have failed to meet our 2010 target, there have been positive steps, such as the reintroduction of water voles on the Gwent Levels, which show that well planned and scientifically informed conservation work has been successful. Equally, we would like to see examples of how these goals are expected to translate into action on the ground.

We were surprised that there is very little review of previous conservation action, and the frameworks to co-ordinate this action. Had this taken place, there would be more of an idea of what works and what needs to change, whereas the current assumption appears to be that everything needs to change.

It is very worrying that there is no ultimate accountability for this plan. Just as there is very little commitment to action on the ground, there is very little assignation of responsibility, either to Welsh Government or to NRW.

Whale and Dolphin Conservation (WDC) response to consultation on the Nature Recovery Plan for Wales

Whale and Dolphin Conservation (WDC) is the leading global charity dedicated to the conservation and protection of whales and dolphins. We defend these remarkable creatures against the many threats they face through campaigns, lobbying, advising governments, conservation projects, field research and rescue. Our vision is a world where every whale and dolphin is safe and free. WDC has had a presence in Wales for many years including a long-term research project in North Wales studying Risso's dolphins and harbour porpoise which has emphasized the importance of Welsh waters for cetaceans.

WDC welcomes the opportunity to comment on this important document. We know that the threats to our whales and dolphins are growing with the increased use of our seas for transport, energy developments, certain fisheries and leisure interests. The Welsh Government also has an international commitment to halt all declines in biodiversity by 2020 – this is only 5 years away and WDC are concerned that it will be very difficult to meet this target, let alone see the start of population recoveries.

WDC is very disappointed by the consultation. It is written in a form that is difficult to follow and does not seem to understand basic ecological concepts. We are concerned there is no 'plan' just a vague aspiration to use 'Natural Resource Management' to achieve vague aims. The language seems to emphasise resource use rather than nature recovery.

WDC believe that we need a fully funded plan of action that meets the conservation needs of all cetaceans (whales, dolphins and porpoises) found in Welsh waters. This must include clear targets for population increases for key species. We do not think that "Natural Resource Management" on its own is enough to deliver proper and sustainable protection.

Improving our network of protected sites is essential. Despite a legal obligation since 1992 we still have no protected sites for porpoise in Wales. We also need a fully coherent network of protected sites across Wales to fulfil existing obligations under the Habitats Directive, OSPAR and the Marine and Coastal Access Act and these sites must be properly protected and managed– this must be a key feature of the Recovery plan. We need Welsh Government to invest in restoring our special sites and priority species and habitats. Commitment to improving these crucial nature conservation tools in the Nature Recovery Plan is essential.

There must be investment in developing scientific evidence. We need to be able to see what's working and what's not – strategic planning and monitoring the condition of sites and trends for a full range of species and habitats is essential. This helps us understand 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. Currently most monitoring is carried out by NGOs such as ourselves – unfortunately NRW's grants scheme specifically excludes research and monitoring. Welsh Government must fully fund the necessary research and monitoring in association with experts, NGO's and universities.

WDC believe the Environment (Wales) Bill must 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. WDC considers that this point is very important – there must be legally binding targets where the Government can be held to account if they do not deliver. If they are not prepared to do this it shows very little commitment to nature.

WDC is happy to work with Welsh Government to deliver a real plan for the recovery of cetaceans in Welsh waters, and their subsequent long term recovery to sustainable populations. WDC believe we must be ambitious in looking to recovery not just halting declines. In short, to look forward to a time where every whale and dolphin is safe and free.



**NATURE RECOVERY PLAN
Natural Resources Wales - Consultation Response
3rd December 2014**

Introduction

Thank you for consulting Natural Resources Wales on the draft Nature Recovery Plan. We welcome this development and many of the proposals within it. We are pleased to see that many of our previous comments are reflected in the current version. We do, however have a number of comments which we hope will help to improve the focus, detail and achievability of the Plan

The purpose of Natural Resources Wales is to ensure that the environment and natural resources of Wales are sustainably maintained, sustainably enhanced and sustainably used. Natural Resources Wales works as a regulator, partner and advisor to businesses, non-governmental organisations, local authorities and communities to help deliver Welsh Government and European Union policies and priorities. We take an ecosystem approach to promoting integrated natural resource management that delivers social, economic and environmental benefits to the people of Wales.

Set out below are the key messages contained in our response. Our response to the specific questions is set out in Annex 1. Annex 2 contains some specific comments on the text within the plan.

The Key Messages:

1. The consultation document reads as a Nature Recovery Strategy not a Plan: it sets out strategic direction and action rather than a detailed action plan. As such it needs to clearly signpost the emerging legislative programme and other delivery and funding mechanisms to ensure its success.

2. Integration

Biodiversity underpins a healthy, resilient environment and is affected by a complex range of issues. Policy integration is essential to reverse biodiversity loss and deliver ecosystem services, but this is also a key challenge. The Nature Recovery Plan should be the strategy that sets out how Wales will address this challenge of integration across the range of potential delivery mechanisms.

It is important to set out where plans like this sit in the hierarchy of strategy and delivery to ensure an integrated approach to Natural Resource Management.

The Well-Being of Future Generations Bill, the Environment and Planning Bills and the National Marine Plan will all have a significant role in improving integration. The Nature Recovery Plan should not run parallel to these processes but instead should seek to influence and work through all relevant policy areas and delivery mechanisms. Appropriate measures developed to report on the Nature Recovery

Plan should be adopted into other policies and reported as part of the State of Natural Resources Report (SoNaRR). In this way, nature recovery is an integral part of the national policy priorities on integrated natural resource management.

3. Timeframe

The Nature Recovery Plan sets out the strategic delivery framework to 2020. It should also include a longer term mission or vision and review cycle beyond 2020. The Welsh legislative framework currently under development has a longer timeframe and the key mechanisms will not be in place to deliver for some years. It is important therefore that the Nature Recovery Plan is clear on how it will deliver on-the-ground improvements for biodiversity in the interim, in order to make real, measurable progress towards the goals and wider EU and Global commitments.

4. Broad ownership

A range of stakeholders and Government Departments need to be actively involved in the development and the delivery of the Nature Recovery Plan to capitalise on opportunities through the delivery by others. This will provide the incentive for new and existing stakeholders, and engage the full range of decision makers from all parts of the public sector at a local and a Wales level. This aligns well with implementing natural resource planning and management using the ecosystem approach. Mechanisms to achieve this should be set out.

5. Resources:

Successful delivery will depend on Welsh Government maximising opportunities for joint working and funding across Departments, and on its ability to secure biodiversity benefits from a range of European funds. Each strategic action needs to clearly identify resources to support its delivery, and link to a co-produced set of national and local priorities reflected in the existing and new policies and plans. Delivery of these should be supported by secure and vibrant partnerships across the voluntary/third, public and private sectors.

6. Delivery for species

The Nature Recovery Plan needs to recognise and reflect management requirements that provide specific targeted action for the most vulnerable species, particularly N2K Annex II species.

7. Sustainable land/water management

The current Nature Recovery Plan provides the opportunity to secure sustainable land and water management by active engagement with land/water owners and managers. To effectively address biodiversity declines in Wales, it is absolutely imperative to engage with these stakeholders to enable them to work individually and collaboratively



whilst still sustaining viable businesses within rural communities. To support appropriate action in the right places there needs to be greater explanation on how current and future mechanisms such as Glastir will be informed by the Nature Recovery Plan and also by future area based evidence and advice.

8. Incentivise Businesses

Natural Resources Wales welcomes the opportunity to review how we, Welsh Government, and others work alongside businesses to review instruments which will encourage land / water owners and managers and other businesses to respond positively to action which supports recovery of ecosystems and biodiversity. We will need to work together to encourage engagement in delivery through advice that is linked to better regulation and improved implementation of regulation. We also advise that Wales demonstrates more effectively how a recovering environment can create a platform for sustainable development and opportunities for green growth.

9. The Goals

While recognising the need to keep these simple and focused they must also be meaningful to all involved, and measurable and time-bound.

10. Evidence and Knowledge

We welcome the inclusion of an action specifically on improving the evidence base. The development of a strategic evidence base to underpin this work is a high priority. Current capacity to monitor and report on priority species and habitats to inform SoNaRR and other statutory commitments is limited. Natural Resources Wales has formally recognised the importance of securing an improved evidence base for natural resource management and has produced its Evidence Strategy. However, we also recognise that there is a gulf between ever greater expectations and diminishing resources. It would be helpful to have some more explicit consideration of roles and responsibilities in this area, as well as looking for opportunities to gain evidence from crowd sourcing or citizen science.

11. Capacity

To deliver the requirements of the Nature Recovery Plan, existing knowledge skills and resources will need to be used more effectively. Increased capacity can come from changing ways of working as well as from increasing investment. Local authorities, Natural Resources Wales, the agriculture sector, other NGO sectors and others are already refocusing their activities in response to natural resource management policies. New stakeholders can also increase capacity to deliver.

12. Public engagement

How we engage people in different sectors of society requires a goal with measurable targets. This is arguably the biggest challenge, as without public support and political will we are unlikely to deliver the other goals. This work links to improving health and well-being, cultural services and social values. It should be supported by the education sector through curricular developments and integration into life-long learning and professional development programmes across sectors.

13. Maximise funding opportunities

Funding streams particularly European (EU) funds, but also including others such as aggregates/waste tax funds, have potential to maximise benefits from public funding invested in nature.

Greater effort will also be needed to identify new financial instruments and market opportunities. The LIFE N2K project has let a contract to explore such opportunities. The contract will identify and appraise both current and potential funding mechanisms for N2K in Wales.

14. The Wales Environment Strategy Clarity is required on the future of the commitments made in the Wales Environment Strategy.

15. Global impact of Wales

This is twofold:

- The impact of decisions and actions taken in Wales on global biodiversity. The latest Living Planet report stated that the population sizes of vertebrate species have fallen on average by 52% in the last four decades.¹ All countries have a responsibility to reduce their global impacts and this plan should set out how Wales will do this.
- Wales supports edge of range habitats which are significant in a European and Global context, such as Atlantic oak woodlands, species-rich marshy grasslands, blanket bog, dwarf-shrub heath and the most southerly UK examples of montane habitats.

¹ WWF (2014) The Living Planet Report 2014 – Species and Spaces, People and Places

Annex 1 – Consultation Questions

Q1. 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 ambition to reverse the decline of biodiversity is welcome but should have a timeframe. Is this to be achieved by 2020 or is it longer term? It should include management and restoration of biodiversity and ecosystem services as far as feasible, and also be underpinned by a commitment *to value biodiversity (not just economically) and facilitate/encourage every sector of government and society to act*. The focus on natural resource management will deliver benefits if biodiversity is properly embedded in its policies, decision-making and funding mechanisms. However, other delivery tools will be needed to address the complex and increasing pressures causing biodiversity decline in the terrestrial, freshwater and marine environment.

Q2. Does the ambition statement capture this new approach fully? What might be added?

The Nature Recovery Plan needs to establish a sensible and resourced policy framework for the recovery of species and habitats in Wales and clearly state how developing legislative and policy tools in Wales will contribute to delivery. Linking back to the governance set out in the Well-being of Future Generations Bill has the potential to secure delivery at a local level by ensuring biodiversity is properly considered within local Well-being plans. It is important that those who refer to the Nature Recovery Plan understand a) that species and habitat conservation is part of the ecosystem approach and b) their own role in delivering nature recovery. The ambition and goals could be improved to promote this understanding.

Q3. Are our goals the right ones? What might be added?

The Nature Recovery Plan needs to set out the immediate goals that Wales will achieve in response to the Convention on Biological Diversity (CBD) Strategic Plan for Biodiversity² by 2020. The wording of the goals should be meaningful, measurable and time-bound. It also needs to set out its review/reporting cycle and a longer term vision.

Each goal needs a number of measurable milestones or targets (expressed spatially wherever possible) that will lead to action in the next 5 years. In addition, future milestones or targets beyond this date need to be agreed. In 2006 the Welsh Assembly set out its vision for the environment in 2026 within the Environment Strategy for Wales³. The targets in this Plan need to reflect the biodiversity ambition set out in Strategy outcomes 19-22 (pp 36 and 38). These have provided an important lever for co-

² The Convention on Biological Diversity (2011) *The Strategic Plan for Biodiversity 2011-2020 and the Aichi targets – Living in Harmony with Nature* Secretariat of the CB, Quebec, Canada

³ Welsh Assembly Government (May 2006) *'Environment Strategy for Wales'*



ordinated action over the years, including drawing down European and other funding.

We suggest there needs to be 7 Goals. Goal 2 should be split into two and an additional two goals should be added (proposed Goals 6 and 7).

Goal 1: To restore degraded habitats at Scale

This should be changed to *'restore and enhance habitats and species populations working at the appropriate scale in the marine, freshwater and terrestrial environment'*

Targets can then be set to measure progress against this goal which links back to Strategic Goal C and D. The 15% restoration target should be linked to any No Net Loss targets set.

Goal 2: To address key negative factors of biodiversity loss and increase connectivity significantly.

This goal should be divided into 2 goals (goals 2 and 3)

We suggest:

Goal 2: to use green/blue infrastructure at neighbourhood, local authority and national scales to connect habitats and ecosystems to benefit both people and biodiversity.

Examples actions include:

- develop robust green/blue infrastructure policies e.g. through refreshing planning policy, using the existing Local Development Plan process, the National Development Framework and Strategic Development Plans proposed in the Planning (Wales) Bill,
- engage others e.g. local authorities, landowners/managers and businesses in improving connectivity through management of their estate;
- Commit to manage non-built spaces on the Welsh Government estate (including NHS Trusts, and all AGSBs) as multifunctional green infrastructure to benefit both people and biodiversity.

Goal 3: To address the key negative factors causing biodiversity loss.

Example action include:

- identify and map the main pressures on biodiversity and identify the potential mechanisms to address them. Some work on this has already been started through the Water Framework Directive and the LIFE N2K project.
- specific time-bound actions to address priority pressures and threats.

Goal 4: To improve management of our highest quality environments

Change this to *"to improve the management of our highest quality environments and connectivity between them".* The goal also needs to commit to the marine, terrestrial and freshwater environments. It should complement the new proposed Goal 2 and focus on "bigger, better and

more connected” high quality environments. We need to see a commitment to maintain and restore a full range of natural habitats, enhance critically scarce habitats and sustain/enhance more modified ecosystems (an important aspect of connectivity) to deliver the full range of ecosystem services and improve resilience for nature and for people.

Goal 5: To achieve No Net Loss

The goal for ‘No Net Loss’ needs to be more specific and be part of wider regulatory processes (beyond planning). Currently environmental assessments and best practice support decision making to avoid damage and/or deliver biodiversity benefits.

Action examples include:

- Agree a ‘No Net Loss’ policy and build this into the National Natural Resources Policy, area natural resource management statements and SoNaRR.
- Establish the baseline, monitoring and surveillance in order to determine ‘No Net Loss’.
- Engage with different sectors and explore what ‘No Net Loss’ would look like to help businesses understand what they need to do and how this can provide a variety of benefits to their operations.

Goal 6: (proposed goal): Everyone will understand the importance of nature and green infrastructure in supporting human life, and will regard public money spent prudently upon these as a crucial investment.

All sectors of society have a responsibility to reverse biodiversity loss. This goal needs to set out ambitious targets that will drive action to promote understanding of the value of biodiversity, influence public policy and encourage people to act. Education will be vital to build the understanding on which change can take place (see key message 12). Targets could include making more effective use of outdoor classrooms and outdoor education to make the connections between living in and using the outdoors, and the consequences of behaviour, lifestyle and product design on the biodiversity that people experience.

Goal 7: (proposed goal) – To reduce the global impacts of decisions and actions taken in Wales

The focus of goal 7 should be on reducing the impacts on global biodiversity of decisions and actions taken in Wales. This aligns with the EU Biodiversity Strategy⁴ Goal 6 (averting global biodiversity loss) and should be delivered largely through the Well-being of Future Generations Bill.

Goal 5⁵ in the current consultation document is an action rather than a goal and is picked up under actions 8 and 10 below.

⁴ European Commission (2011) *The EU Biodiversity Strategy to 2020* Publications Office of the European Union, Luxembourg

⁵ “To put in place a framework of governance to support delivery, working together across sectors and strengthening our collective evidence base.

Q4. Are the actions proposed right and adequate?

The actions need to be set out more clearly and directly link back to legislation and delivery mechanisms.

Each action should set out:

- The Action
- Strategic commitments / lead organisation
- Timeframe for delivery
- Resources
- How this will benefit species and habitats
- How progress will be measured
- Accountability

Action 1 - Putting in place effective natural resource management.

This is an important element of future biodiversity action. However, it is difficult to identify from the current Nature Recovery Plan exactly how natural resource management will deliver action for species and habitats. A diagram might help explain this. There needs to be a clear line of sight from the Nature Recovery Plan to the development and delivery of the WG legislative programme including National Natural Resource Policy and SoNaRR, and to area natural resource management statements. This would improve accountability across sectors for biodiversity loss and degradation, and encourage implementation of the Natural Environment and Rural Communities (NERC) Act 2006: Biodiversity Duty and Section 42 species and habitats.

Action 2 - Delivering a Welsh Marine Plan

This action should include reference to the protection and management of Marine Protected Areas, in particular the N2K network. The objective is to bring features on sites into favourable condition.

Action 3 - Facilitating Cross-sector policy integration

The following strategic commitments could help progress this action:

- Review government subsidies with an aim of eliminating those that are damaging to biodiversity/nature (CBD Aichi target 3. In Wales work has focused on the agricultural sector, however there may be other subsidies that damage biodiversity and these should be reviewed and new incentives developed that encourage positive decisions.
- Embed Nature Recovery Plan priorities and measures/indicators in the Well-being of Future Generations Bill to improve accountability for delivery across sectors, and report through SoNaRR.
- Carry out a biodiversity audit across Government departments. The National Assembly for Wales Sustainability Committee Inquiry into biodiversity loss report 2011⁶ included a recommendation: “*Welsh*

⁶ National Assembly for Wales Sustainability Committee (January 2011) *Inquiry into Biodiversity in Wales*

Government to complete and publish an audit on how Government's aspiration to halt biodiversity loss is reflected in the current work of all Government departments and agencies".

Some local authorities have already done this.

- Support implementation of the NERC Act Biodiversity Duty across government and its agencies, and support and monitor progress.
- Use the EU Structural Funds in an integrated way to support nature recovery alongside wider economic and social objectives. The European Commission, Director General of DG Environment stated in 2011 that: *"Consecutive LIFE programmes have placed a high priority on Natura 2000. However, the strategic objective has been to mainstream the funding of Natura 2000 into the key sectoral funds and in this context important resources have been allocated from the main EU financing instruments such as rural development policy or regional, cohesion and marine funds".*⁷
- Local authorities have appointed Biodiversity Champions at Cabinet level. We would advocate nominating Biodiversity Champions across government and industry at a senior level. Champions could communicate the risks and opportunities associated with biodiversity to particular sector groups in a language they understand.

Policy integration across all sectors outside the environment sector such as economic development, transport and health links back to our ability to mitigate for, and adapt to climate change. The new legislative and policy framework will provide wider opportunities to influence key sectors.

The key mechanisms for delivering integration we recognise are:

- i) the Resilient Wales well-being goal in the Well-being of Future Generations Bill - "A biodiverse natural environment with healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change"
- ii) the National Natural Resource Policy as set out in the Environment Bill - which should be clear about the importance of the underpinning biodiversity and where activity for biodiversity helps to deliver the Nature Recovery Plan goals
- iii) the Area-based Approach and Area Statements as set out in the Environment Bill – which should provide a clear steer to other public bodies in the contribution that they can make in delivering the Nature Recovery Plan goals, thereby complying with the NERC Act Biodiversity Duty and demonstrating the application of the Sustainable Development principle and the contribution to the Well-being goals

⁷ Kettunen, M., Torkler, P. and Rayment, M. (2014) *Financing Natura 2000 Guidance Handbook*. Part I – EU funding opportunities in 2014-2020, a publication commissioned by the European Commission DG Environment (June 2014)

iv) likewise the National Marine Plan should be clear about the expected role that different industry and sector groups will need to play in contributing to the resilience of marine biodiversity and ecosystems.

The Well-Being of Future Generations Bill will require the public sector to consider the sustainable development goals in their decision making processes. The “Resilient Wales” Goal in the draft provides an opportunity to ensure all sectors consider resilience - and therefore biodiversity - in decision making processes, but success will require the involvement of biodiversity expertise. Natural Resources Wales’s statutory membership of Public Service Boards will help embed natural resource priorities in the development of Well-Being Plans. Local biodiversity arrangements will also have a crucial role, and can help with both local prioritisation and delivery. This resource is a key risk as local authorities and others face budget reduction. Welsh Government needs to secure agreement on how to retain critical expertise, skills and mechanisms to deliver nature recovery and wider natural resource management and planning policies.

Biodiversity expertise from across Wales needs to be involved in the development of the National Natural Resources Policy, the area natural resource management statements, and mechanisms developed as part of the Wales National Marine Plan. This will ensure that, when balancing the different requirements of land and water management, the impacts on, and opportunities for, biodiversity are considered in an informed way.

Embedding biodiversity in the new delivery mechanisms can be guided by existing priorities and draw on work already undertaken at a local and a national level. Protected sites and species and the NERC Act (2006) Section 42 list of habitats and species underpin this work. Natural Resources Wales continues to undertake connectivity mapping for priority sites and habitats, and the Wales Biodiversity Partnership (WBP) have produced maps showing where urgent action is required for different ecosystems. These are fundamental to delivering the Goals highlighted in the Nature Recovery Plan. We see these as critical to informing the area-based approach, particularly where they can be presented as strategic opportunity maps. Similarly, local authorities have mapped their local wildlife sites and Local Biodiversity Action Plan Partnerships (LBAPs) have identified priorities. Along with all the work undertaken by partner organisations this provides a wealth of information on which future prioritisation can be built to inform new statements, policies and plans.

Action 4 - Funding our partners

There needs to be some separation between the action ‘Funding Our Partners’ and the action ‘Identifying financial instruments’.

Currently the Funding Our Partners action covers Welsh Government and Natural Resources Wales funding, in addition to the European Maritime and Fisheries Fund (EMFF) and LIFE. The action on financial instruments

contains reference to the Natural Capital Financing Facility which is part of the LIFE Programme. We suggest that the Funding section could cover Welsh Government and Natural Resources Wales financial support and the other section could cover European and other funding streams.

We very much welcome the commitment to fund our partners as the Nature Recovery Plan cannot be implemented by Welsh Government or Natural Resources Wales alone. It will need to involve a range of stakeholders who will need resources (staff and finance) to deliver, and so this action will underpin a considerable share of the contribution some partners make. Funding opportunities need to be developed and delivered in a coordinated manner.

Two headline messages that need to be embedded into any Government approach to funding are:

- A programme of funding over 3-5 years with an annual launch would establish a longer term timeframe for delivery. This longer term approach would not only enable continuity and encourage partners to develop better quality projects but would take into account the time required to make a real and measureable difference to habitats and priorities.
- Any fund must take account of time required for application, assessment and establishment of projects and initiatives: a short lead-in time is not conducive to quality projects.

Welsh Government could explore further Strategic Joint Working through partnerships, building on and expanding the work currently underway in Natural Resources Wales. Welsh Government could develop a joint partnership around a specific issue, develop ideas and improve capacity to address this issue. One example is the emerging Welsh Government-led Peatlands for the Future project. There are other significant opportunities including the wider use of the model developed for the Welsh Government Resilient Ecosystems Fund.

Action 5 – Identifying financial Instruments

A number of European funding mechanisms have the potential to support nature recovery.

- **LIFE Funding:** The LIFE Programme is the only European fund solely for funding of the environment. The opportunities offered by LIFE cover all aspects of the environment, including biodiversity, nature conservation and in particular for climate change mitigation. The Consultation document refers to the perceived complexities of this fund, and it will be essential for Welsh Government to support LIFE applicants to access these funds in order to ensure that the opportunities offered are maximised. The Natural Capital Financing Facility (NCFF) is part of the LIFE Programme and is intended to encourage investments in revenue-generating or cost-saving

projects promoting natural capital and green growth. Reference to the NCFF in the Consultation document is welcomed, as this can promote the recognition of the economic role of the natural environment.

A strategic framework laying out broad objectives and relative priorities for funding is important. The LIFE N2K project managed by Natural Resources Wales can provide this framework for Wales's Natura sites but a similar framework could be developed for other sites and would act as a guide to funders and applicants alike. However, this would require dedicated funds.

Development of major externally funded projects by partners should be encouraged and supported with a clear pathway to information, match funding opportunities, bid preparation, project management expertise, and Welsh Government support.

Funding to support technological developments and other innovative methods to solve biodiversity management problems would be welcome, as is happening with the Small Business Initiative in which Natural Resources Wales is already engaged. There should also be investigation into the feasibility of initiatives such as a visitor payback schemes, and the development and marketing of produce from wildlife areas.

We would also welcome strategic funding mechanisms that improve nature through targeted sustainable land management of privately owned farmland. This would need to be at a landscape scale by encouraging the cooperation and collaboration of farmers. The popularity of the Welsh Government Nature Fund clearly demonstrates that, with the right incentives in place, there are many groups of farmers that are willing to deliver a broad range of services that benefit nature in addition to producing sustainable food on their farms.

There needs to be clear and open dialogue between Welsh Government, Natural Resources Wales and other stakeholders on improving and joining up existing mechanisms and developing new ones to encourage greater investment in the natural environment. Further opportunities may arise by tackling where there is market failure, and by linking beneficiaries of services with those who provide the benefit.

Action 6 – Reviewing designated sites and species

Natural Resources Wales welcomes the statement that *“Our designated sites are the jewels in the crown of our natural environment and need to be core to our refreshed approach.”*

The proposal is about the integration of conservation objectives rather than the species and habitats. We suggest this action is renamed to reflect this.

The text should clarify that the management and restoration of N2K sites will be delivered under the strategic framework of the LIFE N2K Programme and Prioritised Action Framework (PAF). The programme will set out actions, costs and priorities for the network. Welsh Government's support for this initiative is welcome. Delivery of high priority actions identified in the N2K Programme and PAF should be supported, for example, by access to external funds so that favourable condition of features is achieved within identified timeframes.

This action commits "*Government to set clear objectives for the European designated Natura 2000 network (N2K) in the statutory National Natural Resource Policy.*" We agree that it would be helpful for the National Natural Resources Policy to make clear that meeting the conservation and restoration requirements of the N2K network is a priority. This should also be stated in the Nature Recovery Plan. However it is not clear what is meant by the proposal for Welsh Government to set clear objectives for the N2K network. Any such objectives will need to align closely with the Habitats Directive's strategic aim, otherwise it runs the risk of creating tensions between the new Natural Resources Policy and Wales's obligations under the Habitats and Birds Directives. Also, any national or strategic level objectives for the N2K network will need to support and reinforce the site level objectives set out in the management plans for N2K sites.

We would welcome some further discussion on the proposal for "*Natural Resources Wales to review and strengthen the approach to site management plans so that they proactively address the underlying challenges facing the designated areas and so that regulatory and funding activity is fully aligned to deliver the management objectives*". This is a potentially significant piece of work. Natural Resources Wales is already carrying out a review and updating the N2K management plans. We would welcome the discussion being based on these findings.

The SSSIs and N2K sites represent the most important sites in Wales for the conservation of biodiversity. Successfully halting and reversing biodiversity loss will require concerted action, both inside and outside the designated sites network. The emphasis of this particular strand of work should therefore be on looking at how measures in the wider environment can help strengthen and complement the ability of these sites to deliver their statutory purpose of helping to conserve and restore biodiversity. With this caveat we support the principle of seeking to treat N2K sites, other designations and the wider environment in ways that deliver multiple benefits. Wales's current suite of designated sites already provides a wide range of benefits in terms of ecosystem services. Recent research commissioned by Defra on the benefits of SSSIs in England and Wales showed that the estimated value of SSSIs in terms of provision of

ecosystem services far exceeds their cost⁸. That report also provides evidence that the value of SSSIs as providers of ecosystem services is further enhanced if they are well managed so as to achieve the favourable condition of the designated features.

We note the intention is to explore opportunities for future legislative change if it is considered necessary, and we look forward to continuing to support and advise Welsh Government in identifying and understanding the nature and causes of any conflicting objectives around designated sites and protected species, and possible solutions.

In general, the objectives from the different legislations do not conflict, but there are often different levels of aspiration and a different focus. Work is already underway to align objectives (e.g. the Water Framework Directive with the Habitats Regulations), and where it may not be possible to remove objectives it would be better to consider increasing transparency, alignment and integration of those objectives around a particular place.

Action 7 – Monitoring and reviewing regulatory instruments

We note that the new EU Commissioner for Environment, Maritime Affairs and Fisheries, Karmenu Vella, has stated that he will be carrying out a “Fitness Check” of the Habitats and Birds Directives, therefore, these findings will need to be taken into account.

Action 8 – Improving the Evidence Base: Research, Monitoring and Surveillance

The Plan needs to include recognition of where we are now and where we need to be with biodiversity evidence-based development. We should then focus on the strategic action required, who needs to be involved and how this will be resourced, with a view to informing SoNaRR and our international reporting commitments as well as providing evidence-based advice.

Natural Resources Wales has developed an Evidence Strategy in association with Welsh Government, which includes 8 strategic objectives. These describe our long term ambition and are all relevant in the context of this consultation response (see Annex 3). Specifically Objective 6 is important here “*We will work on securing the evidence needed to halt biodiversity loss (including achieve the CBD and EU targets) and for climate change adaptation and mitigation.*” The deliverables for this objective include:

- Provide the evidence base to secure the strategic long-term management and restoration of our designated sites;
- Continue to provide the evidence base to inform our understanding of ecological connectivity;

⁸ GHK Consulting Ltd, in conjunction with Dr Mike Christie of Aberystwyth University, ADAS, IEEP, Rick Minter and the Research Box (June 2011) Benefits of Sites of Special Scientific Interest DEFRA, London

- Continue to develop our strategic biodiversity evidence base (e.g. habitat mapping);
- Provide the evidence to inform our efforts to meet CBD/Aichi targets to halt and reverse biodiversity loss.

These cannot be achieved without delivering all of the 8 objectives to build our capacity, our knowledge base, our partnerships and our ability to interpret evidence. This in turn will underpin our advice both internally and to Welsh Government, and improve our reporting.

Improvements in monitoring and surveillance require broadening out these programmes into the wider environment. This needs to include monitoring and surveillance for species, habitats, ecosystem functioning, environmental variables and human pressures affecting biodiversity. In particular there needs to be a record of the losses and impacts associated with development or regulatory decisions. This requires a significant increase in resources. An inadequate or uncertain evidence base will generate risks which could compromise the Recovery Plan and the progress of the required environmental management.

We support the suggestion to include testing and monitoring of fundamental aspects of ecosystem functioning such as soil condition. This is consistent with European and international policy responses to biodiversity loss, where soil issues are increasingly and explicitly being considered e.g. CBD⁹ and Sustainable Development Goals^{10,11}.

A lack of understanding of soils presents a significant knowledge gap¹², which hindered the achievement of the 2010 headline target for biodiversity and is an obstacle to reaching the 2020 biodiversity headline target and vision¹³. Work to establish the condition of soil and assessing the risks of soil biodiversity loss will need to utilise robust indicators and be integrated with programmes that study the relationship between soils, above-ground biodiversity, and the resulting ecosystem services¹⁴. We recognise the significance of the soil quality monitoring work being carried out for the Glastir Monitoring and Evaluation Programme. The augmentation of monitoring to adequately cover soils as part of

⁹ Report of the Subsidiary Body on Scientific, Technical and Technological Advice on the Work of Its Seventeenth Meeting. UNEP/CBD/COP/12/2. <http://www.cbd.int/doc/meetings/cop/cop-12/official/cop-12-02-en.pdf>

¹⁰ The Future We Want: Outcome document adopted at Rio+20. A/RES/66/288. http://www.un.org/ga/search/view_doc.asp?symbol=A/RES/66/288&Lang=E

¹¹ Report of the Open Working Group of the UN General Assembly on Sustainable Development Goals. A/68/970. http://www.un.org/ga/search/view_doc.asp?symbol=A/68/970&Lang=E

¹² EU 2010 biodiversity baseline. EEA Report No 12/2010. http://www.eea.europa.eu/publications/eu-2010-biodiversity-baseline/at_download/file

¹³ Impact assessment (SEC(2011) 540) accompanying Our life insurance, our natural capital: an EU biodiversity strategy to 2020 (COM(2011) 244 final). <http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52011SC0540&from=EN>

¹⁴ Soil biodiversity: functions, threats and tools for policy makers. Technical Report - 2010 - 049. http://ec.europa.eu/environment/archives/soil/pdf/biodiversity_report.pdf

Sustainable Land Management and Integrated Natural Resources Management will require significantly increased resources.

We are also mindful that the relationship between biodiversity and concepts such as ecosystem resilience, resistance and services, are complex and still poorly understood. There are primary and large scale research needs around understanding ecosystem structure and functioning; climate change interactions; cumulative pressure effects; and sustaining and increasing ecosystem benefits. We recognise that the need for this type of research extends beyond Wales and is reflected in UK science strategy, such as the UK Marine Science Strategy. As a consequence Natural Resources Wales is seeking to influence the research agenda of other organisations such as the Natural Environment Research Council.

Natural Resources Wales is fully committed to the operational ambition of the Hampton Principles - collecting data once, sharing it, and using it often. We also believe the overall objective of evidence is to provide the context to motivate the societal and governmental changes needed to protect nature for the future.

Given the significant challenges set out above and the commitment to developing evidence-based policy, it is vital that Welsh Government works with partners to look for opportunities to address the key gaps in resources and capacity. The suggested development of a shared evidence base between Natural Resources Wales and Welsh Government is welcome. It will further support our evidence and reporting work if we also engage with existing and planned UK mechanisms such as the State of Nature Partnership. In line with this we strongly support the use of the Information Hub and its role in making environmental data open and available to anyone with a need or interest. This work should link to, and build on existing initiatives and engage in wider partnerships. In Wales this includes, the Local Records centres, the WBP Evidence Gaps project and the continued use and support of BARS as the monitoring and evaluation framework for the Nature Recovery Plan.

We welcome the commitment to monitor and model the Nature Recovery Plan and we would support a wider discussion, including partners, on how this might be achieved. Any monitoring of the impact of the Nature Recovery Plan will need to be aligned to the requirements for SoNaRR and ultimately CBD reporting, and include data from current statutory monitoring. Monitoring should also seek to make use of existing long term monitoring programmes e.g. for butterflies, bats and some bird species, as well as data from the long term environmental monitoring schemes.

Action 9 – Effective Communication and Engagement

To secure delivery of the outcomes, engagement about the value of Wales's biodiversity is key. This should be achieved by effective communications to a diverse range of audiences with a clear focus to encourage behaviour change where appropriate.

We agree with the statement that Welsh Government need to engage with, enthuse and communicate the value of biodiversity so that stakeholders are encouraged to act. We feel that this section of the Nature Recovery Plan is vital and this is why we have suggested that engaging people and encouraging them to act becomes an explicit new goal for the plan (as mentioned in our response to Q3). This goal should have clearly defined targets and outcomes so that we can track and measure progress over time.

Much work was done around prompting people to value, care and act for biodiversity for the International Year of Biodiversity in 2010, and Futerra – a creative communications agency - developed a guide to creating effective messages:

http://www.futerra.co.uk/downloads/Branding_Biodiversity.pdf. The key idea from this work is that we need to humanise and personalise the environmental message. But ultimately we must ensure that people understand “why” nature recovery is important in building a secure future. The key output from this work is that by personalising the environmental message, we make it more meaningful to those people that we want to reach.

However, biodiversity and nature must not be seen as a stand-alone – we must ensure that they become the cornerstone of our message. Integrated Natural Resource Management is a developing concept and Welsh Government leads on developing an agreed definition. Welsh Government must describe the concept in an accessible way, with easy to understand language. This way more people will understand the ideas behind the theory, encouraging momentum in its take up as a foundation for our decisions.

The Nature Recovery Plan communications plan: we believe that this needs to be strengthened. Welsh Government needs to lead, inspire and engage others so that we can work collaboratively to deliver a shared communications approach against which our work can be evaluated and measured.

While the consultation document refers to some existing partnerships, there are many other programmes of work that could be exemplar. Natural Resources Wales has a key role to play in the development of an effective communications and engagement approach, and is willing to work collaboratively to create the best results for the benefit of Wales.

Action 10 – Providing Better Governance for Nature

Natural Resources Wales is supportive of this action. It is important that the 'refresh' fully engages existing partners and builds on the successes of the current arrangements.

All-Wales groups are an important element of the delivery of this plan. It has been invaluable to have groups that are able to give informed advice to those who deliver action. There is a need to establish a robust governance structure to oversee the management and restoration of the N2K network across Wales in addition to ecosystem and species and INNS groups. The challenge will be to ensure that strategic needs are embedded into the local governance structures that are developed, as well as all-Wales level groups.

It has been a challenge in the current structure to build in a way of engaging new stakeholders to improve integration and broaden ownership without diluting the robust scientific basis on which the ecosystem and species groups are built. It might be best to establish this through robust links from the WBSB to the wider public sector, as part of the formal governance and reporting arrangements for the Well-being of Future Generations Bill.

Ultimately good governance should lead to greater activity on the ground and the realisation of the goals set out in this plan. Regional partnerships, forums and groups (referred to as regional groups), LBAPs and LRCS are examples of initiatives that have galvanised local effort.

Regional groups have a more strategic role and work to deliver shared priorities across a number of LBAPs e.g. through landscape-scale initiatives as well as developing common guidance and funding proposals that cross boundaries.

LBAPs bring together local people, local authority staff and others with the expertise to plan action and deliver shared local and national priorities. Action has included practical management, influencing local decision making, collecting the evidence, educational activities and a variety of events such as those held during Wales Biodiversity Week, all aimed at increasing knowledge, interest and understanding about the importance of nature.

LRCS have a key role in citizen science and engaging local recorders and recording groups. They have a lot of experience in this area as well as a uniquely local perspective and well established contacts.

As local authorities restructure it will be important to maintain local expertise. Welsh Government should work with the WLGA and Natural Resources Wales to consider what local level action will help deliver local Well-being Plans. This work is vital if national policies for nature and wider natural resources management are to work. A commitment to develop these links could make effective use of local knowledge, expertise and skills.

This action commits to identifying priority species and habitats that society wishes to see benefit. This is important, especially if the Nature Recovery Plan is to engage with the public, and to some extent this has been done through initiatives such as Plantlife's County Flower. However, the Welsh priorities for action must be based on robust evidence and informed by the relevant expertise as well as aligned with existing commitments defined in European and UK legislation.

Q5. What additional action would you wish to see?

The plan proposes a fairly comprehensive suite of high level actions. The main gaps identified are actions to support the proposed Goals 2 and 7. Inclusion of an action that commits to achieving favourable condition on all designated sites would be helpful. The assumption is that this high level 'Plan' will be supported by the development of a resourced action plan to enable delivery on the ground.

The focus should be on getting the proposed actions right and linking them firmly to governance arrangements emerging from new legislation and policy and to SoNaRR. This should ensure shared responsibility and greater accountability for the Nature Recovery Plan, and support real benefits for nature on the ground by using the full set of existing and developing mechanisms and tools.

Q6. How do we engage with business more effectively to deliver our ambition?

- Engage stakeholders from key business sectors in understanding the benefits of nature and in the development of mechanisms and tools for delivering the Nature Recovery Plan, embedding their knowledge, learning from their experience and utilising their skills.
- Increase the Nature Recovery Plan's focus on the 'start of pipe' solutions that remove the causes of biodiversity loss. A deeper, more transparent engagement with business and the co-development of workable solutions will be an important part of fixing problems at source.
- The Natural Resources Wales Board Champion for Innovation is investigating the potential creation of a Wales-focused Natural Resources Coalition to bring together leaders of progressive businesses with policy makers and staff, to develop potential routes to success that factor in the radical, transformative change that will be needed.
- Revise incentives, other than for agriculture, as suggested under Action 3 on Integration. This could also extend the 'polluter pays' principle to biodiversity by offering financial rewards or exemptions from charging for businesses which participate effectively in schemes to promote biodiversity (e.g. the Wildlife Trusts' Biodiversity Benchmark scheme), and recover the money from fines or charges for those which do not - rendering this policy fiscally neutral.

- Use the new legislative and policy framework (including the marine Plan) to take a fresh look at how Wales develops its infrastructure. There is an opportunity to adopt a strategic and long term approach to integrating green, blue and grey infrastructure to ensure future economic, environmental and social resilience. This will help Wales attract long term, sustainable business.
- Use the new RDP to focus on (i) a more targeted approach to the land management payments available under Glastir; (ii) capital investments that contribute to resource efficiency; and (iii) advisory systems which provide farmers with practical tools to measure the contributions of their businesses to sustainable land management.
- Welsh Government could consider the employment of environmental advisors for the enterprise zones to ensure that these zones actively contribute to the Nature Recovery Plan and other environmental goals. These could be linked to the area natural resource management statements and delivery of local Well-being Plans.

The Nature Recovery Plan sets out the ambition for biodiversity and ecosystems. However, the goals and actions can inform future strategies and should be supported by government through funding, incentives and investment opportunities for all sectors, from agriculture and forestry to energy and fisheries.

Q7. How can we strengthen the way we work together?

Integration: Ensuring nature recovery is firmly integrated in the new legislative and policy framework and the resulting delivery mechanisms. Throughout this consultation response we have set out how we think this can be achieved to ensure that the Nature Recovery Plan is delivered through the Welsh Government's new approach to sustainable development, natural resource management, planning and marine planning. Central to this is linking the governance and reporting for biodiversity to that of sustainable development. This must happen at a strategic and a local level so that there is joint accountability.

Partnership: Maintain and support the biodiversity and ecosystem expertise that has been developed at a local and Wales level. Limited capacity means that partnership working is essential to develop and act on evidence, and invest in appropriate action in the right places. The partnership approach provides a single voice for those taking local action. This is an effective and efficient use of the limited expertise available in Wales.

Sustaining local delivery: At a local level the LBAPs and LRCs have proved to be a successful mechanism for coordinating evidence and action through engaging and enthusing different sectors. Continued investment in delivering local action will be necessary. There is much that can be learnt from these approaches.

Engaging stakeholders: Empowering, broadening and incentivising local involvement by engaging new stakeholders such as local business and health authority representatives is a key challenge and an opportunity. Stakeholder groups such as agriculture and fishing can bring valuable local knowledge, supporting the collection of new data and information as well as ideas on how to engage in their wider communities to deliver action. Understanding, where relevant, the economic value of taking action for biodiversity will be vital to encourage input from some key sectors and for influencing decision makers about budget allocations. It is good to see the consultation includes reference to the Wildlife Economy Wales report¹⁵, however, there are gaps, consideration could be given to targeting or tailoring this economic / benefit assessment work to specific sectors or audiences.

Cross border working: For some species, habitats and ecosystem services strong collaboration with the other UK countries and Ireland will strengthen our ability to achieve benefits. Welsh Government will need to consider how we can maximise these opportunities as we develop new Welsh legislation and policies.

Q8. How can we share budgets and look at integrated outcomes?

The Well-being of Future Generations Bill aims to ensure budgets are aligned to the Well-being goals for government and its agencies to encourage integrated shared outcome delivery. Evidence such as the UK National Ecosystem Assessment increasingly demonstrates that action that benefits biodiversity also benefits other government priorities¹⁶. There is therefore a real opportunity for government to demonstrate how it can work across sectors to secure collaborative delivery, sharing expertise, staff and budgets. To achieve this, biodiversity and ecosystem values (not just financial) need to be embedded in the corporate strategies/plans of a range of stakeholders using the Resilient Wales Well-being goal as the lever.

One example might be a collaboration with Public Health Wales (PHW) and local health boards. Currently a number of schemes have been successfully trialled to test the use of outdoor activity in the natural environment as an alternative to conventional prescriptions for patients with certain physical and mental health issues. An ambition would be to work towards a shared budget between environment and health departments to deliver common outcomes and providing a funded alternative to prescribing whilst also maintaining natural green space. Common indicators could be adopted to meet objectives in the Nature Recovery Plan and the Health Strategy e.g. via Public Service Boards.

¹⁵ Mabis (2001) 'Wildlife Economy Wales': An Economic Evaluation Scoping Study' – Final Report A report Commissioned by the Valuing our Environment Partnership

¹⁶ UK National Ecosystem Assessment (2011) 'The UK National Ecosystem Assessment Technical report.' UNEP-WCMC, Cambridge



In many cases collaborative working will need additional and sustainable funding to support delivery of the shared outcomes. The Nature Fund process has led 14 new farmer collaboration groups set up in 2014. This demonstrates the potential for delivering on a landscape scale in areas where this has been difficult due to the patchwork of individually owned private land in Wales. Future funding needs to be part of a longer term programme to secure long term benefits.

Welsh Government should adopt a more coordinated approach to European Funding including LIFE, plus provide support for accessing these structural funds.

The revised Prioritised Action Framework (due to be completed in August 2015) should be used as the strategic framework to determine and prioritise applications for European funds for the N2K network.

Q9. What else should be done to avoid duplication and to deliver our goals?

- Close working with United Kingdom Environmental Observation Framework. <http://www.ukeof.org.uk/> (UKEOF) to avoid duplication of monitoring effort.
- Close working with the National Biodiversity Network (NBN) and the Marine Environmental and Data Information Network (MEDIN) to avoid duplication of ecological data tools, guidance and standards.
- Close working with the LRCs in Wales to take advantage of their work with local recorders and recording groups and the data management services they offer.
- Co-ordinated and comprehensive use of BARS.
- Support and engagement with the WBP Evidence Gaps project.
- Work with the Wales Environment Research Hub which can provide synthesized evidence, and build capacity to deliver evidence-based policy.
- Engage with LBAPs, regional groups and Wales-level WBP groups.
- Close working with Welsh Government on development and delivery of Payment for Ecosystem services and other mechanisms.
- Coordinate and support development of European funding bids.
- Continued support for collaborative working with partners.
- Continue to engage with land/water owners and managers and other businesses in Wales using various current/new mechanisms and incentives.

Q10. How can we best use the Information Hub to collate and disseminate data and evidence?

The data and information Hub represents a great opportunity to make ecological data relating to Wales available to a wide range of people. There are a few points which need to be considered to get the most out of it, however:

- a. Links need to be made with existing data portals, especially the NBN Gateway (<https://data.nbn.org.uk/>) and the Local Record Centres' Data Access Tool (<http://www.lrcwalesdat.org/eng/index.php>). This will avoid duplication and also there is an opportunity to use web services to pull data in from these locations, and display it through the information hub.
- b. Consideration of access and rights controls. Without a system of approving access to various areas of the download and/or datasets we will be limited to open data, which loses the opportunity to use the system to give licence-controlled access to data. This would be a huge time saving for Natural Resources Wales and other data providers, and a much quicker and simpler method of accessing data for our data customers.
- c. The Hub needs to be a mechanism to help Natural Resources Wales and others meet their obligations under the INSPIRE Regulations.
- d. Careful thought will need to be given to standards and formats for the Hub to ensure inter-operability of datasets. This is required so that information on various aspects of the environment can be combined, viewed and queried together, allowing an ecosystem approach to be taken.

Q11. 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?

The reporting cycle should link to other key reporting cycles. Wales needs to contribute to the UK CBD report and thought also needs to be given as to how the Nature Recovery Plan will be reported through the SoNaRR and the Sustainable Development duty.

In addition to formal reporting, Welsh Government should consider how it reports back to the public and other stakeholders. Current communications mechanisms could be developed to support this e.g. WBP website and development of social media; feedback from LBAPs to Public Service Boards; better use of the WBP Conference and Wales Biodiversity Week.

Q12. We have asked a number of specific questions. Please let us know if you think there are related issues which we have not specifically addressed, and provide further information.

We have no further comments. However, we have specific suggestions concerning the text in parts of the Plan that we would be happy to discuss with members of the Welsh Government Biodiversity and Nature Conservation team. These are provided in Annex 1.



ANNEX 2 – Specific comments on the text within the Plan

General:

Diversity: There are many references to the importance of diversity. There needs to be recognition that some natural systems are not diverse and are equally important. If they become more diverse (in terms of species) it could be because they have become degraded (enrichment from pollutants/INNS etc) – so in these cases, *less* diversity may be more reflective of a healthy resilient ecosystem.

Page 4 paragraph 4 - Please add freshwater into terrestrial and marine environments.

Page 6 - This section is currently a description of some of the rich areas for biodiversity in Wales (or explains why Wales is important for biodiversity) and if this is what is intended it should include some representative species e.g. western woodland birds (pied flycatcher, wood warbler), marsh fritillaries, lesser horseshoe bats etc. If the intention is to describe the landscape/seascape of Wales today then this paragraph would look very different, and include reference to a landscape shaped by agriculture, forestry, tourism and coal, slate and energy developments etc. Alternatively you could use the key findings from the Wales chapter of the National Ecosystem Assessment (set out in Annex 1 of the consultation document) or a selection of these. The ambition could then go on to explain how biodiversity can thrive alongside and be part of the wider industries and developments that sustain the economy in Wales, e.g. agriculture, fisheries, tourism, forestry, utilities, energy, house building and other development. Whatever is intended the message is that the title to the section needs to be clear and the text needs to accurately reflect the title.

Page 7 - scale or extent. Pollinators are not a good example for this. It would be better to use a wetland example: smaller wetlands are more threatened by impacts at their edges from, e.g. fertiliser, drying, scrub invasion.

Page 8 - role of protected areas. Also important is the fact that they may support only part of a species habitat requirement. We cannot, for example, notify all the feeding range of the bats using a building that is a SSSI; upland raptors need ffridd or even coastal areas to support their winter feeding. Habitats in protected areas also sit within the wider matrix of that and other habitats within the wider countryside.

This section needs to cross reference with the review of Designated Landscapes in Wales.

Paragraph 1 says that *‘The diversity should maintain the ability of ecosystems to adapt to whatever disturbance is applied to them’*. This statement is not correct and should take out ‘whatever’ and change to “natural disturbance”.

Annex 3 – Natural Resources Wales Evidence Strategy Objectives

The **8 Objectives** in the **Natural Resources Wales Evidence Strategy**:

1. We will further develop our independent capacity to report on the state of our natural resources and the pressures they face (including statutory environmental monitoring).
2. We will have the evidence to provide the context for Natural Resources Wales's decision-making and operations.
3. We will have the evidence needed to underpin advice to Welsh Government, including potential areas of policy development.
4. We will provide the evidence required to support implementation of The Ecosystem Approach, Natural Resource Management and Ecosystem Services Assessments.
5. We will increase our in-house capacity to analyse and interpret data and wider evidence in the context of changing operational and policy needs.
6. We will work on securing the evidence needed to halt biodiversity loss (including achieve the CBD and EU targets) and for climate change adaptation and mitigation.
7. We will expand and develop evidence partnership opportunities and seek to influence the research agendas of others.
8. Through succession planning we will secure and develop the Natural Resources Wales knowledge base in terms of staff skills.

3 December 2014

Our ref: 14-15-30



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Dear Sir/Madam

Consultation on the Nature Recovery Plan for Wales

Natural England's purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Nature does not recognise administrative boundaries and so, we have developed many fruitful relationships with Welsh partners. For example, we manage the Welsh area of the Fenn's, Whixall and Bettisfield Mosses National Nature Reserve (NNR) on behalf of Welsh Government, we are collaborating with the Brecon Beacon National Park Authority to find better solutions to repair peat scars in the Black Mountains SSSI and, we work with Natural Resources Wales, through membership of the Land Use Policy Group, to develop a better evidence base on the environmental impacts of various approaches to agricultural and forestry land use. These, and other, partnerships have proved beneficial to nature in both Wales and England; whether through more joined up site management, action on trans-border issues or, by securing a better evidence base for policy makers.

The Nature Recovery Plan for Wales, as set out in the consultation document, whilst recognising the European and UK policy framework, does not explicitly recognise the need, or benefits, of transnational working. For example, to deliver your ambition of building the resilience of your ecosystems, the consultation document states "we need to ensure that our habitats are well connected: that we have diversity and mosaics of habitats and species across Wales". We would suggest that the connectivity, diversity and mosaics of habitats and species need to be acted on beyond administrative boundaries. Tackling these issues in a collaborative way will be beneficial to nature in both England and Wales. The approach you propose for nature recovery in Wales is broadly similar to our approach in England. This consistency will aid collaborative working in future. We have not responded to the consultation questions rather, we focus our comments on cross border and trans-national issues which have not been explicitly covered. We believe these can continue to be addressed through collaboration and close joint working. We look forward to continuing to work with partners in Wales to the benefit of nature in both England and Wales as you take forward your Nature Recovery Plan for Wales.

Cross border sites

Our common border, the trans-boundary attribute of nature and, the legacy from former administrative arrangements has resulted in a number of protected sites which straddle the English / Welsh border. This can present a number of challenges as we seek bigger, better more resilient sites. For example:



Natural England is accredited to the Cabinet Office Service Excellence Standard

- The Fenn's, Whixall and Bettisfield Mosses NNR. is primarily owned by Natural Resources Wales but, is managed in its entirety by Natural England. Close working arrangements have developed to secure the land necessary to provide a buffer to the site and, to impact on its hydrology. Only through cooperation can we achieve a bigger, better more resilient site.
- Natural England have joint responsibility with Natural Resources Wales for the Rivers Dee and Severn. The Severn is a particularly large cross border site facing multiple issues – energy generation (2 nuclear power stations, barrage and tidal lagoon proposals, wind turbines), port development, dredging, managed realignment, coastal squeeze, water quality, water quantity and, fish migration. Managing these issues and building the resilience of the site is only possible with a transnational collaborative approach with all stakeholders.
- Black Mountains SSSI – Here we have been working with the Brecon Beacons NPA and Natural Resources Wales to find solutions to address peat scars along the border of England and Wales. Management of the site has been a regular discussion point between Natural Resources Wales and Natural England as we seek ways to work with land managers, many of whom have land on both sides of the border, and engage them in our land management schemes.
- Liverpool Bay / Bae Lerpwl SPA is a large cross border site extending from Anglesey in the west to Fleetwood in the north and out to around 6 nautical miles and is protected for non-breeding red throated diver *Gavia stellata* and common scoter *Melanitta nigra*. Natural England and Natural Resources Wales work closely together, in an advisory role, to ensure on-going operations such as fisheries and new development proposals such as offshore wind farms are as sustainable as possible and avoid adversely affecting the site.

Cross border issues

Beyond specific sites, a number of wider cross border issues arise. These issues are consistent with those arising from a landscape scale approach, only complicated by the necessity of working collaboratively with another administration and achieving buy in from a further set of stakeholders. We would suggest that your Plan recognises the need for landscape scale working beyond the borders of Wales. This would address issues with, for example:

- the Wye Valley woodlands, a grouping of 16 woodland SSSI's, 8 in Wales, 7 in England and one cross border site, face significant pressure from deer browsing and invasive species. This pressure is leading to unfavourable condition of the sites. Such issues cannot be solved by one country alone, effective cooperation between England and Wales is essential to if these sites are to achieve favourable condition.
- Wye Valley and Forest of Dean Bat sites / Safleoedd Ystlumod Dyffryn Gwy a Fforest y Ddena, an archipelago SAC, with 13 component SSSI's, 9 in England and 4 in Wales. The SSSIs protect some maternity roosts and hibernacula of lesser and greater horseshoe bats. Many sites with qualifying numbers of these species are not notified as SSSIs, and so are not included in the SAC. The SSSI/SAC boundaries are drawn tightly to the structures, so there is virtually no protection given to emergence cover, flight lines, feeding sites and swarming sites. Evidence suggests that the bat population is not just connected across the River Wye, but also with sites in the Malverns, and possibly even the Cotswolds.

Collaborative working on science – evidence, research and monitoring

Your Plan recognises the need for action focussed on evidence, research, monitoring and surveillance. We currently engage with Welsh colleagues on those issues, at a variety of levels, to the benefit of nature in England and Wales. We would suggest that your Plan recognises the need and value of cross border partnerships / collaboration on scientific work. For example:

- With regard to Liverpool Bay / Bae Lerpwl SPA, Natural England and Natural Resources Wales, together with the Joint Nature Conservation Committee, work closely to monitor the bird species and assess the site's condition for these species.
- We work with Natural Resources Wales on Site Improvement Plans under the International Programme for England's Natura 2000 Sites (funded by European Union LIFE+ funding) and the equivalent programme in Wales. These programmes seek to identify the main issues impacting sites, the actions to resolve these and who needs to undertake these actions.
- Natural England, and the Environment Agency, are in discussions with colleagues in Natural Resources Wales and Welsh Water on an action plan to address phosphate entering the Wye SAC from sewage treatment plants and diffuse sources from agriculture, following a modelling exercise on the sources of the phosphate.
- On the Dee Estuary (Dee Estuary SSSI, Dee Estuary/ Aber Dyfrdwy SAC, Dee Estuary SPA/Ramsar) Natural England and Natural Resources Wales work through the Dee Sea Fisheries Liaison Group providing advice on the management of sustainable fisheries eg cockles.
- At a more strategic level, we work with Natural Resources Wales, and the other UK statutory agencies, through the Land Use Policy Group (LUPG), currently chaired by Natural Resources Wales, to develop a better evidence base on the environmental impacts of various approaches to agricultural and forestry land use. This joint approach has developed valued evidence on common issues such as Sustainable Intensification, Agri-environment and Greening; evidence that has proven useful at country, UK and European levels.

Any clarification you may require on the detail of the submission can be obtained from Graeme Kerr , Senior Specialist, 0300 060 1159, Graeme.kerr@naturalengland.org.uk .

Yours faithfully



Alan Law
Director, Biodiversity Delivery



Consultation on the Nature Recovery Plan for Wales

Introduction

CLA Cymru is the membership organisation for owners of land, property and businesses in rural Wales. We help safeguard the interests of landowners and those with an economic, social and environmental interest in rural land and the rural economy. Between them, CLA Cymru members own and manage about half of the rural land in Wales including edge of settlement locations and some urban portfolios.

We have been looking after the interests of our members, as well as promoting the positive aspects of land ownership, land management and rural business activities for the past 100 years. The quality of the countryside and its natural resources are of vital importance to our members. Most objectives for the countryside - economic, social and environmental - rely on landowners and managers for their success. Equally a healthy environment relies upon a thriving rural economy and financially viable agricultural businesses.

General Comments

It was encouraging to see such wide acceptance of the State of Nature report which conclusively demonstrated the decline in biodiversity over the last several decades. This period, which saw the introduction of increasingly restrictive regulation and policy promoted by environmental interest groups, failed completely to maintain the nature-rich landscape created by generations of landowners, farmers and foresters.

The rural environment in Wales is largely man-made. As it is this active management which has created the bio-diverse landscape we want to conserve, it would appear logical to assume it is people in these roles who would have the best expertise and knowledge to do so. People whose businesses and livelihoods depend on the land have a vested interest in ensuring that it is well maintained.

Welsh Government must always consider that land based industries need a healthy, diverse landscape in order to survive and never forget that such businesses must be economically viable in order to ensure that the countryside is actively managed for generations to come. Biodiversity is one strand in larger management concerns. The competing pressures of food production, carbon sequestration, water quality, renewable energies and biodiversity are significant and we must begin to acknowledge that solutions must be sought that work within the wider context if they are to become sustainable.

With a limited resource such as land and so many competing demands on its utilisation, it is time for Welsh Government to acknowledge that biodiversity targets must be met within existing, sustainable farming and forestry land management practices. In order to realise

this Wales must adopt the ideas of improving what we already have and encouraging connectivity as outlined in the Lawton review. Significant portions of Wales are already subject to environmental protection designations yet these areas do not necessarily have more biodiversity.

Consultation Questions:

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

As outlined above, CLA Cymru believes that the resilience of our ecosystems is fundamental to the long term survival of those who live and work in the countryside. As a man-made landscape, its long-term survival is best served with the active management from economically viable land based businesses. CLA Cymru would like to encourage Welsh Government to have this at the forefront of their decision making on how to encourage biodiversity within Wales. Whilst we can all agree with the first sentiment of Welsh Government's ambition statement; that there is a need to reverse the decline in biodiversity and build a resilient ecosystem, it is the concluding sentiment that raises concern.

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

Whilst the ambition statement does capture the flavour of what must be achieved, CLA Cymru would question what is understood by Welsh Government to constitute "effective natural resource management". The State of Nature report revealed that the land practices and regulation adopted in recent years have not been effective. Welsh Government must acknowledge this and ensure that our understanding of natural resource management is re-addressed. As outlined in the introduction, it is the people on the ground whose livelihoods depend on the land that have the most appropriate knowledge and understanding of local issues to deliver Welsh Government ambitions.

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

The goals are, broadly, the right ones however it is how these goals are interpreted that is key. All-encompassing definitions of terms such as "degraded landscapes" adopted at a national level do not acknowledge the subtleties of situation at a local level. Whilst we can adopt national goals and aims it must also be recognized that the path to achieving these must be flexible and adaptable for local landscapes.

Considering the current landscape of Wales and the competing demands on what it provides, connectivity is the most realistic method to address biodiversity shortfalls. At present, over 25% of Welsh land is currently covered by some form of environmentally protected landscape designation; 7% of our landmass is directly managed by Natural Resources Wales; National Parks have significant influence over their areas of conservation – Brecon Beacons National Park alone owns at least 14% of the areas within their control. There are ample areas of Wales within the remit of environmentally focused bodies that can and should deliver excellent biodiversity. Work should be encouraged with private landowners to provide connectivity habitats that do not diminish their existing business interests, but add to the overall biodiversity targets.

4. Are the actions proposed right and adequate?

To address your actions individually:

- Putting in place effective natural resource management – as highlighted in question two, CLA Cymru has some concern as to what Welsh Government understands to be effective natural resource management. The people who have lived and worked in the countryside for generations have and will always have a vested interest in ensuring that our natural resources are managed effectively. With so many disparate demands being placed on our landscape it is essential that we ensure biodiversity is delivered alongside existing land-use practices not instead of them.
- Delivering a Welsh National Marine Plan – CLA Cymru welcomes the introduction of a marine plan and would encourage Welsh Government to seek counsel and advice from those individuals actively engaged with marine businesses.
- Facilitating cross-sector policy integration – CLA Cymru believes that there is ample policy concerning environmental matters coming from numerous sources within Welsh Government and would support the unification and simplification of such guidance and regulation, but would not support the introduction of yet more layers of red tape and bureaucracy.
- Funding our partners; and identifying and using other financial instruments – to date we have seen endless projects delivered by „partner” organisations that have a range of ideas but no method to deliver these on the ground. Too often monies spent on partnership work has resulted in nothing more than regular stakeholder meetings. Funds need to be directed to practical action on the ground with minimal “middle man” interference. Welsh Government must learn to engage with those whose continued stewardship of the land can facilitate, not inhibit, biodiversity actions.
- Reviewing designated sites and species – an extremely large proportion of Wales is currently under some form of environmental designation. The system is clearly not working as more and more land has been placed under designation yet our biodiversity has significantly declined. The Lawton review suggests that these designated sites should be the shining beacons of best practice in terms of effective natural resource management. The ones that currently exist in Wales are far from this ideal and it would be redundant of Welsh Government to introduce more until those already in existence are brought up to a better standard. The National Parks in Wales own or control significant proportions of the land in their areas yet have seen the same levels of biodiversity decline as non-designated areas. Would it not be prudent to start improving the areas already designated before introducing new ones? The inflexibility inherent in the regulations of designated sites can cause more harm than good to certain landscapes. There is a need to fix the flaws in the current system before exacerbating the problem with more designated sites.
- Monitoring and reviewing regulatory instruments – as highlighted above, CLA Cymru does not believe there is a need for more bureaucracy. The State of Nature report has proven that our regulatory approach has not worked. No national regulation can adequately address the issues faced by our diverse ecosystem and we need to learn from the past and return to the methods that created our natural ecosystems.
- Encouraging effective communication and engagement – effective communication and engagement are essential. There is a lot of work being done on biodiversity across Wales that is not widely known and if we need to communicate and

understand these efforts better. Language such as the ecosystems approach is not palatable to those expected to deliver on the ground.

- Improving our evidence base – CLA Cymru believes it is essential to have appropriate scientific evidence to support any actions on biodiversity. This should be open and accessible to all.

5. What additional action would you wish to see?

Additional action is a problematic term. CLA Cymru would like to see appropriate action. Specifically we would like to see a decentralised approach that is flexible enough to allow different actions and approaches to address local problems. Actions need to have a long-term approach, work within the natural cycles of the landscape and give due consideration to those who have lived and worked on the land for generations and therefore have more appropriate local knowledge and expertise.

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

Welsh Government must do more to engage with private landowners. The overarching objective of Welsh Government's Nature Fund was extremely positive. The goal of adopting a bottom-up approach and asking landowners what they wanted to do to address nature concerns was, unfortunately, hampered by poor advertising, misunderstanding of how to engage with the landowning sector and some unfortunate political staff changes. With at least a portion of the overall fund making its way to genuine private landowners interested in nature recovery works, CLA Cymru hopes that this style of work can be improved and extended.

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

Welsh Government needs to acknowledge that existing partnerships have led to a decline in biodiversity and seek to forge new working relationships with new partners. Welsh Government has previously overlooked the importance of local knowledge and the benefits of seeking advice and counsel from those directly affected by policies. As many of biodiversity improvements will be delivered, by necessity, by private landowners, CLA Cymru would suggest that now is an opportune time to engage more closely with this group of individuals.

Working relationships with private landowners can only be strengthened with time and mutual trust and understanding. As outlined in question 6, the landowner engagement as envisioned in the Nature Fund proposals were admirable. If this system can be improved and rolled out more extensively with regard to biodiversity engagement, it has the potential to create more long lasting changes and improvements.

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

Biodiversity, if it is to become more sustainable, must be achieved in harmony with existing land management practices. If it is not, we are resigning ourselves to endless public purse

investment every few decades to re-address the issue. Welsh Government must adopt an approach akin to that of the Pontbren project. This particular example clearly demonstrates that environmental benefits can be delivered in ways that are also beneficial to landowning businesses. It also recognized that one size does not fit all; each individual landowner has challenges of existing business structure, landscape, soil types and permanent features. Interventions and environmental improvements must be flexible enough work around these challenges.

To achieve greater integration Welsh Government must look at the interaction of decisions made by its own departments and statutory bodies. The extensive paperwork that will soon be necessary under greening rules has led many upland farmers to turn away from the practice of crop rotation. Traditionally, root crops were rotated into land management practices to improve soil structure and ph levels. This practice, which was extremely beneficial to biodiversity, is now being abandoned due to the inflexible and burdensome regulations introduced to increase diversity. The biodiversity of upland heath and fen areas is greatly increased by controlled cattle grazing as they consume troublesome species such as Molinia and their hoof prints create miniature pond ecosystems that attract the midges and flies that constitute the base of a strong food chain. These benefits are now not realised due to the marked decline in suckler herds due to the persistent unresolved problems of bTB.

Invasive Non-Native Species (INNS) are an under-appreciated problem that should be more actively and fairly addressed. The spread of phytophthora has been devastating, especially for private woodland owners who have to grapple with the problematic issue of a regulatory body, Natural Resources Wales, with a significant vested interest due to their own forestry ownership. If INNS are tackled, it must be with a targeted, unbiased effort across public and privately owned land.

Budgets should be spent on tackling the issues that have caused the decline in biodiversity not creating new areas of conservation or funding partners who have so far delivered little improvement. Integration should be achieved through the regulatory bodies first aligning their goals and actions then seeking input from those who are most affected by the issue – the landowners.

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

Information about projects, partners and outcomes must be more widely accessible. If the Information Hub is to be more widely utilised as a tool to collect and disseminate data and evidence, could a similar approach not be taken to consolidate information about the work undertaken by various schemes and initiatives?

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

The Information Hub has the potential to be an extremely effective tool to evaluate and monitor biodiversity works across Wales. However, as with every database, the quality of

information you extract is dependent on the quality of information provided. Taking the recent ban on Neonicotinoids as an example, reactionary public perception based on unsound science with no regard for the consequences of replacement chemicals or practices and information from other countries led to an EU ban of the product. It is vitally important that the Information Hub does not become entrenched in politically biased research but remains aloof of such problems.

To be most effective the Information Hub must be an impartial, freely accessible service.

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

Progress can be a difficult thing to quantify especially when evaluating such long term issues as biodiversity and resilient land management. With a specific three or five year work programme there is too much emphasis on what numbers have been achieved in the time frame which is unrealistic. Whilst there are many “quick-win” changes that can see improvements within three or five years realistically it can take decades to see and understand the outcomes of specific courses of action.

12. We have asked a number of specific questions: please let us know if you think there are related issues which we have not specifically addressed, and provide further information.

We have reached a critical point with regards biodiversity. CLA Cymru firmly endorses the beneficial role that landowners can play in addressing the decline. The land has been shaped and stewarded by generations of farming and forestry enterprises and engagement with these groups must be sought. Long-standing biodiversity improvements cannot be realised without understanding that they must be delivered in conjunction with existing land-use practices.

With diminishing public spending across the board, CLA Cymru believes that biodiversity must be delivered with practices that are economically viable. In a joint venture with the Game and Wildlife Conservation Trust, we submitted a bid for the Nature Fund. Our project seeks to address the degradation of our moorland areas and was organically formed by a group of owners, tenants and gamekeepers who have concern for this issue. Although we are seeking initial investment to kick-start improvement works, the long-term goal of the project will be financially self-sustaining. The habitat improvements will lead to the increase and reintroduction of several bird species, grass types and the invertebrates that inhabit these areas. There are also significant benefits with carbon storage, water quality improvement and diminished flooding risk downstream whilst creating a pleasant and inviting landscape, the majority of which has open access to the public. This project was driven by the people on the ground and will deliver across the whole sustainability remit.

CLA Cymru would like to encourage Welsh Government to engage with landowners; seek integrated solutions that are economically viable and that do not inhibit essential land management practices. Lastly we would like to suggest that this can be achieved without the

need for more regulation and bureaucracy – diminishing public funds need to be spent on action on the ground.

Consultation on the Nature Recovery Plan for Wales

Response from RSPB Cymru

03 December 2014

RSPB Cymru is part of the RSPB, the country's largest nature conservation charity, inspiring everyone to give nature a home. Together with our partners, we protect threatened birds and wildlife so our towns, coast and countryside will teem with life once again. We play a leading role in BirdLife International, a worldwide partnership of nature conservation organisations.

Introduction

RSPB Cymru welcomes the opportunity to respond to the consultation on proposals for the Nature Recovery Plan for Wales. We feel that the central ambition – reversing the decline in biodiversity through a ‘natural resource management’ approach - could represent a useful additional opportunity to move to a more proactive and ambitious approach to nature conservation alongside effective existing mechanisms and approaches (covering protection, conservation, enhancement and restoration of species, habitats and protected sites), with the potential to provide a sound basis for sustainability in Wales. The case for a step change, and greater ambition for our nature, is highlighted for example in the State of Nature report, which we are pleased to see referenced in the consultation document.

However, we consider this opportunity is jeopardised by the overwhelmingly utilitarian approach to the natural environment espoused, and failure to reflect the critical role of nature - species and habitats and ecological communities in achieving the healthy, resilient ecosystems that are sought (which is integral to the ecosystem approach as developed under the Convention on Biological Diversity - CBD). Furthermore, as it stands, we are not convinced the proposed Plan/Strategy will lead to the step change in delivery that is needed; the approach appears to depend upon its benefits being broadly recognised and acted upon without clear targets or actions, compulsion or identification of resources.

Our key concern about the way in which the new approach is described is that it is presented as a long term alternative to the existing framework and mechanisms for nature recovery. From our analysis of the challenges facing the natural environment, we contend that the greatest opportunity for the new approach to deliver what nature needs, in order to support broader societal aspirations, is through working in combination with the existing conservation tools that are effective and fully applied.

Key Messages and Recommendations

Nature conservation is successful where it is adequately resourced and where the requirements of biodiversity (species and habitats) are properly considered in the context of other resource use/management activities. In simple terms, the state of nature in Wales is due to poor management of our impacts, and insufficient efforts to integrate nature conservation into planning and policy decisions, grant schemes, and so on, in pursuit of truly sustainable solutions.

1. We are supportive of an integrated approach to the sustainable management of our natural resources that **recognises and enables nature conservation** as an essential component. This must be about an integrated environment, society and economy agenda, inclusive of a very wide range of Wales' aspirations. It has to be about more than just a more tightly defined agenda to add environmental sustainability to current Government/industry practices which would be as much about maintaining the viability of production (and consumption) as about achieving ecological goals.
2. It is our expert advice that **Natural Resource Management (NRM) alone will not deliver nature recovery or ecological resilience** particularly in the short timeframe that this draft Plan/Strategy is focused. This advice is based on our experience and expertise as well as using evidence from other countries where NRM has been embedded in policy and practice for a number of years. A focus on this approach alone is constricted and while we have a responsibility to face realities, it is more than processes that many of us value.
3. The final Nature Recovery Plan/Strategy for Wales must create the framework to enable us to be **explicit about what we value in our biodiversity**, encapsulate those values in nature conservation goals and direct on-ground activity that contributes meaningfully to those goals. Many of these species (for example, Natura 2000 Annex II and Schedule 1 species) require specific and targeted action because of current and past activity that has dramatically altered or fragmented the habitats they rely on. They require defined habitat niches or a series of habitat types and extents over their life cycles (and/or the successional stages of habitats). The Nature Recovery Plan/Strategy must recognise and enable actions to address these requirements/issues as part of achieving Global biodiversity commitments.
4. **Protected sites and landscapes are fundamental to nature's recovery.** The activities they enable and support also provide a diverse range of goods and services including nature conservation, sustainable farming, forestry and fisheries, recreation, cultural and knowledge development and, well-being. Improving our network of special places for wildlife is essential. Our sites must be bigger, managed better and more connected (ecologically) – commitment to improving these crucial nature conservation tools in the Nature Recovery Plan/Strategy is essential.
5. The 'Plan' as it is currently laid out, **lacks specificity** about what to focus on. It is more akin to a broad strategy or a set of principles than a plan that will lead to action. Further, very few of the actions, as they are currently articulated in the Plan/Strategy, will lead to any direct activity for nature recovery. Most of the commitments detailed are process driven rather than **outcome driven**.

6. There is no clear route to fund this Plan/Strategy. As part of the final Nature Recovery Plan/Strategy for Wales the Welsh Government must develop a **convincing funding strategy for the natural environment** and measures of shared responsibility across Government.

7. **Investment in scientific evidence and knowledge is essential.** We need to be able to see what's working and what's not – monitoring the condition of protected 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 and focusing them in the right places to get the job done. We can't restore the nature we've lost if we can't see what we're doing.

8. **Connecting people with their natural environment requires effective communication and engagement** and is essential to secure the broad public support required to achieve nature recovery. This requires a clear focus with relevant targets and actions to ensure civil society recognises that public money spent prudently on nature conservation is a crucial investment in terms of health, well-being, cultural services and social value.

9. **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 targets that enable Wales to reverse the declines in nature. We need this 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.

10. **Renewed commitment to support effective leadership for nature conservation** is essential – this can be achieved through the existing Wales Biodiversity Partnership, enabling all sectors to contribute and empowering local partnerships to deliver on-ground activity for nature's recovery. Welsh Government should aim to optimise rather than minimise administrative and/or transaction costs. Without an appropriate institutional framework (for nature recovery) investments could be completely misplaced and communities and industry might be disinterested in or actively block proposed new policy (i.e. the proposed National Natural Resource Management Policy).

11. Nature recovery, sustainable natural resource management, planning at local, regional and national scales and the well being of our future generations are all intrinsically linked through people and places. **The Nature Recovery Plan/Strategy for Wales must be integrated across the legislative and policy programme** (including the Well Being and Future Generations (Wales) Bill, the Environment (Wales) Bill, the Planning (Wales) Bill, Welsh National Marine Plan and existing policies and legislative mechanisms) – it should not operate in isolation or in parallel to these processes and should influence policy and on-ground delivery through all relevant policy areas and delivery mechanisms.

Response to Consultation Questions

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?*

No. We do not agree with the focus of the ambition, it is too fixed on a utilitarian view of wildlife and the natural environment with too little focus on the intrinsic value of nature and the benefits we accrue from its conservation in addition to the goods and services we derive from its use.

We agree with and welcome the focus of the ambition to ‘...reverse the decline in biodiversity...’. However, in reality this is a long-term commitment that extends well beyond 2020. This ambition needs to be tempered with the reality that in the immediate future we need to focus on protecting what we currently have (in terms of native wildlife – species, habitats/ecological communities) and then restoring species populations, habitats and functioning ecosystems.

There is plenty of evidence that demonstrates the vital underpinning role of nature in supporting human endeavour; our health, well being and economic prosperity relies on or is heavily influenced by our engagement and interaction with wildlife and the goods and services we derive from healthy diverse ecosystems. As such we do not recognise the need to focus as part of the ambition in the Nature Recovery Plan/Strategy for Wales on ‘...ensuring lasting benefits to society...’. This is an altogether utilitarian approach and while the final Nature Recovery Plan/Strategy and rolling programme of action to be developed will be an integral part of effective natural resource management (which is based on an ecosystem approach); it is vital that it (the Nature Recovery Plan/Strategy) remains focused on protecting and restoring our biodiversity for its own sake (intrinsic value) alongside developing/supporting activities, policies and instruments that can harness the benefits of nature, and its many processes and functions, to improve our prosperity and well being.

The ambition should be more clearly linked to the Global and EU commitments:

‘To halt and reverse the loss of biodiversity and the degradation of ecosystem services by 2020, and that by 2050, biodiversity is valued, conserved, restored and wisely used, maintaining ecosystem services, sustaining a healthy planet and delivering benefits for all people’.

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

No, it’s use in this context appears to be attempting to reframe nature conservation into a resource focused approach rather than using NRM as an approach to achieve sustainable development goals (of which nature conservation is a fundamental component).

Generally, NRM policy and programmes have been used to reflect a fundamental shift in societal expectations of agriculture, forestry, fisheries, mining etc, from stand-alone commodity-based industries to those that have social, economic, and environmental responsibilities. As such it is curious that the approach detailed in the draft Nature Recovery Plan/Strategy appears to turn this on its head and propose a broad approach to biodiversity

conservation that must fit into a framework centred on resource-use for economic and social gain.

The ambition statement does capture to some degree the focus of an NRM approach. However, it does not capture fully an approach that will automatically lead to halting or reversing declines in biodiversity.

We recommend the ambition for the Plan/Strategy needs to capture **an approach that is consistent with CBD and EU commitments and will lead to nature recovery**. This can be articulated in such a way as to be consistent with and complement NRM policy and programmes. For example, it could be as simple as:

Wales' biodiversity is healthy, diverse and resilient to threats, and valued both in its own right and for its essential contribution to our existence.

The Plan/Strategy could then outline the Principles through which nature recovery will be supported and achieved with clear outcomes and actions. A draft Principles paper was developed by the Wales Biodiversity Strategy Board (WBSB), if this was agreed and finalised it could form the basis of this. For example:

- Nature recovery is an integral part of an NRM system (which is based on an ecosystem approach); it is vital that it remains focused on protecting and restoring our biodiversity for its own sake (intrinsic value) whether or not there are benefits to us.
- Biodiversity is best conserved by protecting and improving the condition of existing habitats *in-situ* (including habitats in their own right as well as habitats for species), making them bigger, ecologically coherent and connecting them functionally across landscapes and seascapes. Protected sites form the core of this approach¹.
- Effective nature conservation operates at the landscape and seascape scale across public and private tenures.
- Natural ecosystems are dynamic but have a finite capacity to recover from external threats, impacts and pressures. We need to adapt and diversify habitats for resilience and robustness in the face of broad scale pressures such as climate change and other non-reversible environmental changes (eg nitrogen deposition).
- Building resilience recognises the critical links between ecological and social systems.
- Our efforts to conserve biodiversity must acknowledge and respect the culture, values, innovations, practices and knowledge of local communities.

We recognise this is a broad, long-term commitment but in the context of the Nature Recovery Plan/Strategy it should be possible to identify and include within the ambition an element which contributes to this, but one that is measureable and focused on what halting the loss of nature by 2020 looks like in the Wales context. For example, a proposed ambition in line with CBD/EU commitments:

¹ Making Space for Nature: A review of England's Wildlife Sites and Ecological Network. Chaired by Professor Sir John Lawton CBE FRS. Submitted to the Secretary of State, the Department for Environment, Food and Rural Affairs on 16 September 2010

'All species and habitats that are currently declining will not be declining by 2020 and no additional species & habitats will have commenced declines'

However, given the scale of the task, we suspect that achieving this at face value is unlikely to be possible. We therefore suggest a pragmatic approach that success in 2020 would consist of three elements:

- i. A numerical element (ie the number of species and habitats no longer declining in Wales, or agreed regions of Wales) – *to protect what we have*
- ii. A procedural/mechanism usage element (ie what has been put in place that better allows nature's needs to be taken into account and effectively contributes to halting the loss of nature) – *stop further damage and promote recovery*
- iii. An improvement element (ie what is being done to address the past losses and restore or create new habitats, implement change that addresses the long term consequences for biodiversity of climate change and other non reversible environmental changes) – *restore, connect and increase the extent of habitat at scale*

All of these would need further work to identify the targets and measures beneath these headlines. A proportion of these will be achievable through meeting commitments with regards EU and domestic legislation (Nature Directives; Wildlife and Countryside Act etc), still more will be delivered through existing programmes of work that require start-up and/or ongoing support.

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

No. We believe they are a usable set of goals to open the debate but do not agree they are the right goals to deliver nature recovery.

As they are currently framed, it suggests we might invest less in species and/or habitat based conservation efforts and concentrate more on ecological resilience and adaptability; focusing on broad species diversity at the ecosystem scale to optimise the availability of species (no matter their individual or intrinsic value) to maintain ecological functions to support 'lasting benefits to society' and; at the landscape scale, focusing only on habitats and their connectivity to provide options for species to shift and reassemble.

The proposed shift from goals focusing on species, habitats and ecological communities towards goals focused on processes could offer primary directions for NRM policy and broad implementation strategy. It could favour a low intervention philosophy; ensuring the stage is set for adaptation, especially in environments impacted heavily by human activity.

However, a focus on this approach alone will not lead to nature recovery without setting targets and, identifying and prioritising the necessary management actions. While we have a responsibility to face realities, it is more than processes that many of us value. We identify with our wildlife and it contributes to biological diversity on a UK, European and Global stage. What would Wales be without the Snowdon Lily, lapwings, shrill carder bees or fen orchids ?; we have important Atlantic woodlands, southern upland, marine and coastal habitats supporting diverse natural communities and providing many benefits to society.

Priority species and habitats are central to the special and characteristic biodiversity of Wales. Once we have crossed the line from managing for what we know and have, to managing for what might be it is no longer straightforward to define objectives and targets for nature conservation. The Nature Recovery Plan/Strategy for Wales must create the

framework to enable us to be explicit about what we value in our biodiversity, encapsulate those values in nature conservation goals and direct on-ground activity that contributes meaningfully to those goals. For nature's recovery we also need to adapt and diversify habitats for resilience and robustness in the face of climate change and other pressures.

We strongly recommend the inclusion of a goal that captures the fundamental need to conserve biodiversity with explicit reference to the conservation (protection, restoration, and enhancement) of habitats and species (including ecological communities/assemblages of species) to ensure we could see real progress for the recovery of nature. For example:

'Maintain and restore sustainable populations of all naturally occurring species and subspecies across their natural range and enhance their genetic diversity;

Maintain and restore a diverse range of habitats and ecosystems to a healthy functioning state, enhance critically scarce habitats that are characteristic and sustainable, and sustain the more modified ecosystems in production and urban environments that; contribute to social, economic and ecological resilience, and the capacity to adapt to climate and other forms of unavoidable change'.

Species and habitats are central to nature recovery and NRM - Welsh Government must show clear leadership and commitment to delivering nature recovery and tracking progress towards measurable outcomes.

Wales has a rich natural heritage, a high proportion of it of international importance, affording Wales a significant competitive advantage. Much of it is within protected sites, ranging from small but diverse patches of natural grassland to wide tracts of mountain and moorland. Though these designations do not currently protect all of our important plants and animals (there is still much work to do in the marine environment for example), they form a strong foundation from which to maintain healthy, resilient landscapes and seascapes. With proper investment and good management, protected sites can be at the core of natural resource management and nature recovery.

One or two of the goals within the current Plan/Strategy go some way towards articulating the importance of protected sites. However, we strongly recommend a goal that clearly articulates the importance of a full range of protected sites managed sustainably with clear direction and connection to the wider countryside and sea. For example:

'Develop and maintain a coherent network of protected sites across Wales, connecting, protecting and integrating ecosystems rich in wildlife and managed to the highest standard to conserve biodiversity and deliver benefits for landowners, industry and the public'.

Having these goals in the final Plan/Strategy enables clear outcomes to be embedded in future action plans and organisational/institutional functions. It also ensures the relevant commitments developed as part of the Environment Strategy for Wales 2006 can be enhanced and integrated into the Natural Resource Management Programme and resulting policy, legislation and activity.

The Environment Strategy for Wales represents the current Strategy for Welsh Government to meet UK, EU and Global commitments to biodiversity conservation:

The loss of biodiversity has been halted and we can see a definite recovery in the number, range and genetic diversity of species, including those species that need very specific conditions to survive. Recovery to be underway by 2026.

The wider environment is more favourable to biodiversity through appropriate management, reduced habitat fragmentation and increased extent and interconnectivity of habitats.

Sites of international, Welsh and local importance are in favourable condition to support the species and habitats for which they have been identified. All sites to be in favourable condition by 2026.

Our seas will be clean and support healthy ecosystems that are biologically diverse, productive and managed sustainably.

(Environment Strategy 2006)

We would expect the final Nature Recovery Plan/Strategy for Wales to have goals/outcomes which are at least as clear and focused and nature recovery as these outcomes.

For example, we believe an ambitious strategy is required where at least one fifth of Wales' land and one tenth of Wales' seas are primarily protected and managed for nature conservation. Using this as a basis to truly embed sustainable development and sustainable natural resource management into Wales's culture and economy. These areas should be multi-purpose and deliver multiple benefits but they should focus primarily on nature conservation and the social and economic rewards this will engender for the people of Wales. This is not 'pie in the sky' it is proven that protected sites deliver far more return on investment in their protection and good management than surrounding countryside for example. Wales was a world leader in sustainable development, we need to build on this and demonstrate on a UK, EU and Global stage that the natural environment of Wales is valued and protected for the well being of ours and future generations.

4. Are the actions proposed right and adequate?

No. We do not believe the actions proposed go far enough to ensure delivery of nature conservation.

The 'Focus for Action' section does provide a logical basis for informing the development of clear actions and we would agree that an integrated approach to sustainable management is key to achieving our goals. However, the following narrative on 'strategic actions' is largely centred on theoretical concepts and in their current form it is difficult to envisage how they will lead to any direct activity for nature recovery - most of the commitments detailed in the Plan/Strategy are process driven rather than **outcome driven**.

Specific actions to halt biodiversity loss and begin recovery has largely been done already (designated site features; section 42 NERC Act). However, there is need to have a proper process for risk assessment/horizon scanning and review. There must be a clear line of sight from the actions (whether they be strategic or otherwise) within the Nature Recovery Plan/Strategy to delivery of actions required to conserve species and habitats, deliver site condition and make the wider countryside and sea to be favourable to wildlife.

5. What additional action would you wish to see?

The ongoing decline in nature is a threat so serious and of such public importance that the Welsh Government must commit itself to a positive response, building on the steps it has taken so far. An **unambiguous statutory target for halting and reversing biodiversity declines** would be the foundation of an effective response. The approach follows the same

logic and principles that led to the creation of the carbon reduction targets in the UK Climate Change Act. The logical place to embed such a target is on the face of the Environment (Wales) Bill.

Appropriate action would then flow from this framework, however this will require clear targets. This should include, as detailed in the consultation document:

Action focused on safeguarding species, habitats and ecosystems:

- Achieve a national increase of natural habitat managed primarily for biodiversity conservation across terrestrial, aquatic and marine environments - % of terrestrial and inland water areas and, % of marine areas protected and managed effectively in an ecologically coherent network of protected sites for Wales (see also response to Question 3 and link to suggested goal).
 - Activities and investment identified, aligned and in place by 2020 to achieve favourable condition/good environmental status for all protected sites by 2026 (see also response to Question 3 and reference to existing Environment Strategy outcomes and link to suggested goal)
- Achieve a national increase in the area of fragmented landscapes and aquatic systems being restored to improve ecological connectivity.
- A functional agri-environment scheme that delivers tangible outcomes for nature conservation in place and operating effectively by 2015 with targets identified and achieved by 2020 (requires an effective monitoring element which measures success to the level of habitats and species).
- Reduce by at least X% the impacts of invasive species on threatened species and ecological communities in terrestrial, aquatic and marine environments by 2020.

Action focused on evidence and research:

- Nationally agreed science and knowledge priorities for nature conservation are guiding research activities by 2015 (for example, building on and enabling the expansion and effective delivery of existing activities of the Wales Environment Research Hub, WBP Evidence Gaps project)
- A suite of nationally agreed indicators for biodiversity conservation and sustainable natural resource management are in place by 2017.

Action focused on monitoring and surveillance:

- Establish a national long-term biodiversity monitoring system by 2015 (for example, building on and enabling the effective delivery of NRW's existing evidence strategy and other national monitoring and recording schemes; monitoring the condition of protected sites and the full range of species and habitats – see also bullet point on AES above).

Action focused on engagement and support:

- Achieve a net increase in the number of Welsh people and public and private organisations who participate in biodiversity conservation activities.
- Achieve a net increase in employment and participation in nature conservation and natural environment related activity (links to health, well-being and educational portfolio outcomes)
- Achieve a net increase in the number of nature related outdoor educational activities and opportunities within primary and secondary curriculum
- Achieve a doubling of the value of complementary markets for ecosystem services in Wales by 2020

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

See response under Question 8 below.

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

See response under Question 8 below.

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

This response covers Questions 6, 7 and 8.

There is no clear route to fund this Plan/Strategy and therefore no clear route to support nature recovery. The assumption that market-based instruments or incentives are the most favourable and/or efficient mechanism for delivering NRM needs to be evidenced which leaves us with even less confidence that nature conservation will be achieved without a clear funding Strategy developed and enabled by Welsh Government.

Who pays? Who Benefits?

At present there is no clear market to fund nature recovery; therefore the role of Government is to enable the effective allocation of public money to deliver public goods and where there is market failure.

Because of the mixture of public and private costs and benefits associated with NRM the question of funding and resources is problematic. There are difficult issues associated with who pays and who benefits. In considering funding sources for nature conservation within NRM will this be considered integral or will it continue to be viewed as an optional extra? Should it be privately funded or publicly funded, or a tab picked up by the third sector?

Another problematic area is the restoration costs of cumulative effects of resource use on natural systems. The damage that has occurred in the past is often from activities that had policy underpinning and legal authorisation at the time and curtailing those activities or

addressing the damage caused has implications for past investments where there were expectations of ongoing or future returns.

However, contributions may be required from Welsh Government, industry and community interests in order to progress restoration efforts at the scale required to reverse biodiversity decline and secure long-term sustainability. These types of decisions and investments would need to be founded in regional priorities and made by local and regional communities. This in itself brings further challenges in engaging business/industry at a level that has meaning and value for NRM and local solutions to natural resource challenges and opportunities.

It is disappointing that despite Welsh Government advocating payment for ecosystem services (PES) to others, it is not taking the current opportunities where nature is generating an income to use this to pay for nature's restoration! For example:

- The Environment (Wales) Bill proposes to water down the levy paid on plastic bag use so that it can be spent on any 'good cause' rather than on vital environmental protection and restoration.
- The future of landfill tax credits and its invaluable contribution to nature recovery (through grants for biodiversity projects) looks uncertain following recent consultations (it has already been scrapped in England).
- The money Welsh Government and NRW receive from windfarms on the Welsh public forest estate (>£10m) could be an excellent way of demonstrating and role modelling leadership to the business sector on PES but there are currently no plans to direct this towards restoring nature.

The provision of incentives is generally considered key to encouraging and maintaining participation in NRM², the inability to deliver appropriate benefits that have a sufficient impact at the local level is a major challenge. Welsh Government has a fundamental role to play through ensuring that Glastir is developed to support land management practices that build up wildlife in a sustainable way in modern farming and forestry systems.

However, the link from the Nature Recovery Plan/Strategy to the Rural Development Plan (RDP)/Common Agricultural Policy (CAP) is not clear and this is a missed opportunity to set very clear objectives and targets for nature recovery from the RDP/CAP (see also our response to Question 5).

There is a strong sense within the sector that capacity to deliver nature conservation is at a critical low across eNGO's, Local Government, National Parks and NRW alike. The capacity and longevity of organisations delivering nature conservation and NRM are intrinsically linked and this current economic circumstance threatens to put the brakes on any significant progress in the short and long-term. The capacity issues relate to financial (on-ground delivery), administrative, information (evidence, monitoring) and human resources and the lack of stability of these in the face of cyclical and uncertain funding.

It is clear that the level and evenness of support for nature recovery has been insufficient to drive the desired outcomes overall, but also that outstanding successes have been achieved in places. These successes have achieved on-ground outcomes for biodiversity conservation alongside benefits for economy, health and well-being.

² Suich, H 2013, 'The effectiveness of economic incentives for sustaining community based natural resource management', Land Use Policy

As part of the final Nature Recovery Plan/Strategy for Wales the Welsh Government must develop a convincing funding strategy for the natural environment and measures of shared responsibility across Government.

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

Provide the clarity and focus around the things we need to do (in addition to NRM) to secure nature recovery and ecological resilience. Ensure this is aligned across Welsh Government policy development, legislative programme and delivery of functions.

The Environment (Wales) Bill and the powers this legislative framework will establish for Natural Resources Wales (NRW) can operate to strengthen protection and enhancement for the natural environment across all sectors. With a clear focus on protecting and enabling the restoration and enhancement of biodiversity within its core function, NRW has a key role to play in ensuring effective natural resource management that has nature conservation at its centre. Through its various functions and interaction with Government, business, communities and the third sector NRW, could operate to reduce ambiguity within policy and on-ground activity and make a significant contribution to achieving our goals for nature recovery.

The Planning Bill and associated planning policy, legislation and practice must embrace creative solutions, enabling developments that further nature conservation, create habitat restoration opportunities and include sustainable water management systems and green infrastructure. The Planning regime in Wales must integrate with Natural Resources Management Area Planning; there is strong recognition that addressing NRM at a regional scale is justified and effective. Planning provides a framework for addressing, among things, the impacts of development at the local scale on biodiversity; regionally-based NRM provides a framework for the longer term integration of issues, community engagement and linking between policy initiatives and on-ground outcomes. **However, as previously stated there must be a clear focus on biodiversity outcome, targets and actions in order to achieve nature recovery.**

The proposed Welsh National Marine Plan (WNMP) should include an explicit goal to provide the context for enabling sustainable Marine Protected Areas and a healthy ecosystem, which in turn provide the basis for using marine resources sustainably. Both have overlapping spatial implications and should not be treated separately.

Please also refer to our response to question 12 for examples of opportunities to provide clarity in this regard.

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

Identification of the evidence and information needs – building capacity for research, monitoring and reporting to enable progress to be measured and communicated.

Scientific research must set the compass for us in this regard. Developing the evidence that sets tangible and evidence-based targets and supports effective interventions is crucial. However, this evidence has to be applied; we have to invest in practical management that applies the solutions to our negative impacts on nature.

We must also invest in monitoring and surveillance to understand the current state and trends, and particularly important to know the value of different interventions. Identified outcomes and indicators will form a key measure of the Programme for Government and effective monitoring will ensure progress towards targets can be assessed and reported regularly and communicated effectively to the people of Wales.

These can be supported and developed within existing national monitoring schemes but there is a need to expand the taxonomic base to which this is applied. We do not agree that the existing Glastir Monitoring and Evaluation Programme will be able to adequately provide the evidence-base to meet the requirements (this is widely recognised including by the organisations managing the programme). It will be effective at collating information on 'brown issues' such as carbon, water etc but the ability to capture, analyse and report on the status and trends of species in either the terrestrial or marine environment is a key gap in its performance. While modelling and scenario testing is useful and can help set direction, we need real biological data to enable accurate targeting and assessment of delivery effectiveness.

There is a key role for the Data Hub to develop this capacity alongside the existing suite of Welsh LRCs. There must be a distinction between the type and depth of data/information that the Data Hub handles and the services currently provided by the four Welsh LRCs. The service the LRCs offer could potentially cover the whole of Wales and provide a cost effective means of collating and managing biological data to support nature conservation and NRM. There needs to be a commitment to support this service provision across Government (National and Local) to ensure complete coverage and this needs to link effectively to the National Biodiversity Network (NBN; operating at UK level) where much of the data collated by National monitoring schemes and society's is held (including our own).

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?

As outlined in response to question 10 above, measuring and communicating progress requires clear outcomes and targets and, a robust set of indicators. NRM, ecosystem resilience and ecosystem services can have an important role to play in reversing declines in biodiversity but it is not a way of viewing nature that will necessarily appeal to local communities nor have resonance with the people of Wales.

We identify with our wildlife, habitats and special places; these are the true measures of nature recovery and are recognised as the only sure way to measure progress and eventual success in delivering an ecosystem approach (and integrated NRM) and therefore a fundamental measure of sustainable development. It also provides a powerful metric for communicating to the people of Wales progress in this regard.

Table: Core requirements to help guide monitoring/indicator protocol

	Core requirements
1	Maintain and improve protection for (including adequate compensation for essential losses), and complete networks of, national, international and locally designated sites.
2	Improve the condition of national, international and locally designated sites and nature reserves.
3	Create new habitat and restore degraded habitat in order to buffer and expand existing sites, and create stepping stones
4	Enrich areas under farmland, forestry, urban and fisheries use through management to ensure conservation of biodiversity.
5	Maintain and, where necessary, improve protection for species, and implement species recovery programmes where this is required to achieve favourable conservation status.
6	Alleviate threats affecting nature at their root causes, including invasive non-native species, disease, pollution and climate change.
7	We use existing and new tools to understand and take account of nature's value to society and the economy
7	Decision makers that support nature.
8	Society that values nature and is empowered to participate in decision making about nature and natural resources

12. We have asked a number of specific questions. Please let us know if you think there are related issues which we have not specifically addressed, and provide further information.

In addition to our response to question 9 above; the Environment (Wales) Bill and the powers this legislative framework will establish should also be used to strengthen the biodiversity duty (section 40) of the Natural Environment and Rural Communities (NERC) Act 2006. An amendment to the wording of the duty, for example:

‘...to further the restoration and enhancement of biodiversity...’

We do not believe the NERC Act biodiversity duty should be set in the context of NRM or ecosystem services; it must remain focused on biodiversity conservation in order to contribute meaningfully to nature recovery.

A clear Nature Recovery Plan/Strategy should inform forthcoming legislation, which embeds biodiversity targets in law and enables cross Government and Local Authority support for achieving these targets (e.g. ensuring regeneration projects such as City Regions, Business Investment Districts (BIDS) include designs that maximise the benefits of green infrastructure and therefore contribute to biodiversity objectives as well as social and economic objectives).

Alongside new legislation there should be a commitment within the Nature Recovery Plan/Strategy (including the allocation of necessary resources) to full implementation of existing natural environment legislation. For example:

- A fully resourced programme to deliver favourable status across all Natura 2000 and domestic designated sites. A schedule for achieving this by 2020 and 2026 (as detailed in the Environment Strategy for Wales)
- A commitment to support the effective protection and management of local wildlife sites within National and Local Government (including through planning policy and delivery), ensuring that Local Authorities have the resources to ensure that their Local Wildlife Site systems are operating to common standards. Communities should be inspired and enabled to develop local solutions to the particular challenges in restoring nature in their area.
- A funded strategy to enable National Parks to implement and report on their duty to conserve and enhance their wildlife under the National Parks and Access to the Countryside Act 1949.
- The marine environment must be fully recognised within the Nature Recovery Plan/Strategy. The Welsh National Marine Plan must live up to the commitment of the Marine and Coastal Access Act 2009, enabling a comprehensive, ecologically coherent and well-managed Marine Protected Area (MPA) network made up of both European and national sites to be in place to an agreed timetable.
- Actively build the capacity within Local Authorities to ensure full and effective implementation of legislation to protect biodiversity through the planning system – through direct investment in ecological professionals and enabling access to resources and expertise.

A commitment to a number of targeted nature (species and habitat) recovery programmes (priority areas for ecological restoration with statutory support). These need to encompass locally defined frameworks for ecological restoration that can inform long-term decisions on land use and management.