



yn rhoi
cartref i
fyd natur

giving
nature
a home

RSPB Cymru

Lord Dafydd Elis-Thomas AM
Chair of the Environment & Sustainability
Committee
National Assembly for Wales
Tŷ Hywel
Cardiff
CF99 1NA

27 February 2014

Dear Dafydd,

Sustainable Land Management Inquiry – Additional Evidence to Committee regarding the Environment White Paper

RSPB Cymru was pleased to be invited to give evidence to the Committee as part of the Sustainable Land Management inquiry. At the evidence session on 15th January I undertook to provide the Committee with further information regarding:

- i) the definitions within the Environment White Paper, and
 - ii) our concern that the current proposals are not strong enough to effect the change needed, particularly in terms of delivery by bodies other than NRW.
- i) The definitions will be critical to framing the scope of the Bill, and RSPB Cymru is continuing to work with partner organisations to develop our thinking on them. Key changes we believe are required are as follows:
- There should be explicit reference to biodiversity, including species and habitats (in addition to 'biomass and biological resources' currently under the *Natural resources* heading) and reference to the intrinsic value of nature. This would make clear in the Bill that biodiversity is considered important in its own right, rather than only in terms of its exploitation, as stated in paragraph 2.13 of the White Paper. It would also make it clear that the Bill is intended to support delivery of biodiversity objectives.
 - The definition of *integrated natural resource management* should refer to 'conservation, enhancement, restoration and use'. This would better reflect the conservation imperative that is fundamental to the ecosystem approach, as defined by the Convention on Biological Diversity (CBD), and would recognise that our nature is depleted as a starting point. Conservation and restoration are fundamental to secure the healthy, resilient ecosystems we depend on for a range of benefits.

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Mae'r RSPB yn aelod o BirdLife International, partneriaeth o gyrrff cadwraeth sy'n gweithio i sicrhau cartref i fyd natur o amgylch y byd.
The RSPB is a member of BirdLife International, a partnership of conservation organisations working to give nature a home around the world.

Noddwr/Patron: Ei Mawrhydi y Frenhines/Her Majesty the Queen **Cadeirydd y Cyngor /Chairman of Council:** Professor Steve Ormerod, FIEEM
Cadeirydd Pwyllgor Cymru/Chairman, Committee for Wales: Dr Havard Prosser **Cyfarwyddwr, RSPB Cymru/Director, RSPB Cymru:** Katie-jo Luxton

Mae'r Gymdeithas Frenhinol er Cwarchod Adar (yr RSPB) yn elusen gofrestrdedig: Lloegr a Chymru rhif 207076, yr Alban rhif SC037654
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- The word 'optimise' is unhelpful in the definition of *integrated natural resource management*, because it suggests the environmental need could be curtailed in order to ensure socio-economic benefits, rather than being delivered in order to ensure sustainable economic benefits.
 - It must be clear that the aim of the Environment Bill is to establish improved systems and processes to deliver, specifically, the resilient environment that will provide the basis for sustainable development. If this principle is not established the sustainability of the environment (and consequently its ability to support sustainable development) risks **not** being the clear focus of effort around integrated natural resource management. The current definition of *sustainable management* is not sufficiently explicit about the environmental focus of the Bill.
 - Terminology more in keeping with the Brundtland definition of sustainable development should be used, referring to the needs of present and future generations rather than wellbeing or aspirations.
- ii) In addition, during our evidence session we briefly touched upon our view that the White Paper does not set out mechanisms for ensuring the delivery of priorities identified through the new natural resource management process. How the new approach influences and integrates with processes like land use planning, marine management, and deployment of rural payments, as well as project specific decisions, will be fundamental to its success or failure. The White Paper proposes a duty on public bodies to co-operate with NRW around natural resource management, which is welcome. However, there is no proposed requirement for other bodies to take account of the outputs of the natural resource management process, or to deliver the actions identified. We believe that such an outcome-focused duty is needed to ensure the new process will influence or effect action by bodies other than NRW.

I hope this further information is helpful.

Yours sincerely,



Annie Smith
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