

Cynulliad Cenedlaethol Cymru Pwyllgor Amgylchedd a Chynaliadwyedd	National Assembly for Wales Environment and Sustainability Committee
Egwyddorion cyffredinol Bil yr Amgylchedd (Cymru)	General principals of the Environment (Wales) Bill
Ymateb gan Ymddiriedolaeth GIG Felindre	Response from Velindre NHS Trust
EB 16	EB 16

Consultation on the Environment (Wales) Bill

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Summary of Key Points / Recommendations

The Bill will benefit Velindre NHS Trust and the patients and donors we serve in respect of managing its environmental impact and working with natural resources and the local community, in particular regarding new construction projects and refurbishments. Areas that will provide the biggest costs for Velindre NHS Trust are Carbon Budgeting and Waste Segregation in terms of both labour and cost. The Welsh Government proposals are clear, however how the priorities and opportunities will be achieved is not.

The 'at least 80% carbon emission reduction' target could be difficult to achieve, however this target must have been researched and will hopefully be achievable by all organisations. Interim targets should be illustrated to convey progress.

The relationship between this Bill and the Well-being of Future Generations Act 2015 and the Planning (Wales) Bill is clearly defined, our natural resources are essential for us to achieve the well-being of a sustainable Wales and the management of our land must be done alongside how we manage our natural resources.

It is great to see Wales step up and look at managing its impact on the environment on a national scale. Unfortunately cost will be a factor in the success of the Bill, particularly regarding Carbon Budgeting and Waste Segregation. These additional costs need to be justified in order to get the support of Welsh organisations and ensure successful implementation of the Bill. Costs and benefits have been accurately defined and explained within the Regulatory Impact Assessment. The 10 year time period is sufficient for analysis of costs and benefits.

Consultation Questions

Part 1: Natural Resources Management

- 1.1 Do you agree with the Welsh Government's proposals on definitions for 'natural resources' and 'sustainable management of natural resource'?
- Agree with the Welsh Government proposals.
- 1.2 Are there things missing that you think should be included?
- None at this present time.
- 1.3 What are your views on the proposals for a National Natural Resource Policy? Is the Bill clear enough about what this will include?
- Proposals are clear; however how the priorities and opportunities will be achieved is not.
- 1.4 Do you agree with the proposals for area statements? What should these cover and is the process for their development clear enough in the Bill?
- Area statements should cover all of Wales at a local level to ensure accurate representation. The three Area Trials are a good approach, may need more though for accurate representation.
- 1.5 What are your views on the proposal to strengthen the biodiversity duty on public authorities operating in Wales?
- I believe it is a good approach, with the four examples listed. Public authorities may struggle if the approach incurs significant cost increases.
- 1.6 Are you content with the proposals for NRW to have wider powers to enter into land management agreements and have broader experimental powers?
- Yes as long as it doesn't add additional bureaucracy and costs with planning applications etc.

Part 2: Climate Change

- 2.1 Do you agree with the proposals for the 2050 target?
- At least 80% could be difficult to achieve, however this target must have been researched and will hopefully be achievable by all organisations.
- 2.3 For your views as to whether the interim targets should be on the face of the Bill?
- Yes they should to illustrate progress.

- 2.4 Do you believe that the introduction of carbon budgets is a more effective approach than the 3% annual emissions reduction target that is currently in place in Wales?
It may add more pressure to reduce emissions but will it cause additional costs and bureaucracy. Also what will happen if an organisation doesn't meet the requirements of a carbon budget?
- 2.5 What are your views on what emissions should be included in targets?
Utility emissions and business travel emissions should be included. It is very difficult to monitor patient and visitor travel emissions.
- 2.6 All Welsh emissions or those within devolved competence?
All Welsh emissions.
- 2.7 Do you agree with the Bill's proposals as to what should happen if the Welsh Ministers fail to meet emissions targets or carbon budgets?
Cannot find this information in the bill.
- 2.8 What should the role of an advisory body on climate change be?
A body that provides impartial advice to a range of stakeholders regarding the delivery of the desired outcomes.

Part 3: Carrier Bags

- 3.1 Do you agree with the proposal that Welsh Ministers should have powers to raise a charge on all types of carrier bags not only single use bags?
Agree.
- 3.2 Do you agree with the proposal that Welsh Ministers should have powers to raise different charges on different types of bags?
This may be confusing with different prices.
- 3.3 Do you agree that the profits from the sale of carrier bags should be directed to all charitable causes rather than just environmental ones?
Yes.

Part 4: Collection and Disposal of Waste

- 4.1 For your views on whether the Welsh Ministers need further powers to require that certain types of waste are collected, treated and transported separately?
No view.

- 4.2 Do you agree that non-domestic premises should be required to put their waste out for collection in line with any separation requirements set out by the Welsh Government?
It may be unrealistic and impractical to separate waste further than mixed recycling on site due to space and labour restrictions. This may require too many resources and additional labour and costs.
- 4.3 Whether you agree that the Welsh Government needs wider powers to ban some recyclable waste from incineration?
Yes
- 4.4 What will the impacts of these waste proposals be for you or your organisation?
There will be a real impact in terms of practical arrangements and additional cost. However, the aim remains the correct one.
- 4.5 Are there other waste proposals that you think should be included in the Bill?
None at present, but ensuring that any future methods could be included at a later date.

Parts 5 & 6: Marine Licensing and Fisheries for Shellfish

- 5.1 Do you agree with the proposals to introduce charges for further aspects of the marine license process?
Agree if it protects the marine environment and prevents overfishing
- 5.2 What will the impacts of these changes be for you?
There will be limited impacts for us.
- 5.3 Do you agree with the proposals to give Welsh Ministers powers to include provisions in Several and Regulating Orders to secure protection of the marine environment?
Agree with provision of power to reduce harm.
- 5.4 For your views on the proposals to give Welsh Ministers powers to issue site protection notices where harm may have been caused by the operation of a fisheries Order to a European marine site?
Agree with provision of power to reduce harm.
- 5.5 Are there any other marine and fisheries provisions you would like to see included in the Bill?
None at present.

Part 7: Flood and Coastal Erosion and Land Drainage

7.1 Do you agree with the proposals to replace the Flood Risk Management Wales committee with a Flood and Coastal Erosion Committee for Wales?

Agree

7.2 Whether you agree with the proposal for powers to be given Welsh Government agents to enter land to investigate alleged non-compliance with an Agricultural Land Tribunal order in relation to drainage?

Agree if it allows sufficient drainage.

Overarching Question

- For your views on the relationship between this Bill and the Well-being of Future Generations Act 2015 and the Planning (Wales) Bill? Are the links and connections between them clear?

The relationship is clearly defined, our natural resources are essential for us to achieve the well-being of a sustainable Wales and the management of our land must be done alongside how we manage our natural resources.

Finance Questions

- What are your views on the costs and benefits of implementing the Bill? (You may want to consider the overall cost and benefits or just those of individual sections).

It is great to see Wales step up and look at managing its impact on the environment on a national scale. Availability of financial resource will be a factor in the success of the Bill, particularly regarding Carbon Budgeting and Waste Segregation. These additional costs need to be justified in order to get the support of Welsh organisations and ensure successful implementation of the Bill.

- How accurate are the costs and benefits identified in the Regulatory Impact Assessment?
Costs and benefits have been accurately defined and explained in Regulatory Impact Assessment.

- Whether there are any costs or benefits you think may have been missed?

None at present.

- What is the cumulative impact of the costs or benefits of the Bill's proposals for you/your organisation?

The Bill will benefit us in respect of managing its environmental impact and working with natural resources and the local community, in particular regarding new construction projects and refurbishments. Areas that will provide the biggest costs for us are Carbon Budgeting and Waste Segregation in terms of both labour and cost.

- Do you think 10 years (2016-17 to 2025-26) is appropriate to analyse the costs and benefits?

10 years is sufficient.

- The cumulative cost and/or benefit to organisations who will be affected by the Well-being of Future Generations (Wales) Act 2015, the Planning Bill and the Environment Bill?

The Bill will benefit us in respect of managing its environmental impact and working with natural resources and the local community, in particular regarding new construction projects and refurbishments. Areas that will provide the biggest costs for us are Carbon Budgeting and Waste Segregation in terms of both labour and cost.

- Are there any other options that would achieve the intended effect of the Bill in a more cost effective way?

There may be schemes that are already in place and working well for organisations. These could be used or expanded on rather than introducing new schemes (e.g. we are currently working to achieve ISO14001 certification, there is a fee associated with achieving and maintaining this. Could this certification be used as part of waste and carbon schemes and be enforced for other Welsh organisations to achieve.)