

MENTER AR GYFER
CADWRAETH NATUR CYMRU



INITIATIVE FOR NATURE
CONSERVATION CYMRU

Petitions Committee
Welsh Parliament
Cardiff Bay
Cardiff
CF99 1SN

10th November 2020

Dear Petitions Committee

INCC representation following the Minister for Environment, Energy and Rural Affairs' response (LG/02480/20) to Petition P-05-941 – (Biodiversity Remit for Natural Resources Wales).

Thank you for the opportunity to provide further representation to the committee following the response made to the committee by the Minister for Environment, Energy and Rural Affairs (LG/02480/20).

INCC welcomes the investment and recent initiatives toward peatland restoration in Wales as outlined in the Minister's response. Restoring peatland habitats will be an essential component toward reversing the decline in biodiversity in Wales. As well as its importance for biodiversity, peatland restoration will also contribute to addressing Wales' climate emergency and our growing flood risk issues.

However, it is important that the Welsh Government clearly states whether a greater budget for this essential peatland restoration works would have been provided to NRW, if NRW still had the internal staff resources to deliver additional works. Does the £1.135 million represent the maximum achievable peatland restoration possible with the current staff resources to deliver it? The gradual erosion of specialist species and habitat staff within NRW has meant that the organisation as a whole is less able to deliver for biodiversity and less able to take

advantage of opportunities for biodiversity enhancement when they arise.

In her response, the Minister also fails to mention that a substantial amount of spending on peatland restoration in Wales will be used to ameliorate the deleterious impacts on peatland habitats caused by historic and ongoing forestry management operations. Inappropriate afforestation and forest management practices by NRW and its legacy body has caused an inordinate amount of damage to peatland and other upland habitats in recent decades. INCC would welcome clarification on the Welsh Government's position toward removing harmful conifer trees from areas of deep peat across Wales.

Species and habitats continue to be lost in Wales through ongoing forestry operations and neither the Minister nor Forest Resource Plans or Area Statements are able to successfully explain how these conflicts will be managed for the benefit of wildlife in future. Resolving the conflicts between forestry operations and nature conservation should have been a priority for NRW since its inauguration in 2013. Despite this, very little operational change or tangible benefit for biodiversity has occurred within the Welsh Government woodland estate.

If NRW are unable, or unwilling to take action for biodiversity on their own managed estate, it is difficult to see how:

“NRW's purpose and focus supports the transformational change needed to halt and reverse the decline in biodiversity”

Clare Pillman - Chief Executive
Natural Resources Wales

One underlying issue that both NRW and the Welsh Government have failed to resolve over the past seven years is that there are no specific targets set for achieving biodiversity gains. Without firm, evidence based targets to aspire to it is impossible to measure and evaluate success or identify areas for improvement. Instead of targets, NRW's approach has been to announce broad, unmeasurable 'visions' and 'statements that together effectively creates a distorted representation of NRW's ability and capacity to halt and reverse the decline in biodiversity.

The upcoming State of Natural Resources Report (SoNaRR 2020) will be published before the end of the year. Once published, the report will provide a vital insight on how biodiversity and nature conservation is faring in Wales. I would suggest to the Petitions Committee that if

the SoNaRR indicates that the situation regarding biodiversity remains bleak, then a full independent inquiry into NRW's role and ability to reverse the declines should be launched.

An independent inquiry would be able to identify any gaps in NRW's delivery for biodiversity, and identify the reasons for those gaps. Importantly, an inquiry would be able to provide a series of recommendations and solution to help make NRW better equipped at tackling the problem facing biodiversity in Wales.

It has become increasingly clear throughout 2020 that we need to act now if we are to save many iconic Welsh species and their habitats from extinction. To do this we need to know that our statutory environment body is equipped for the task, and if not, what else is needed? Criticism, challenges and independent inquiries are not designed to undermine NRW, its staff or its ability to deliver. Instead, they are designed to ensure that Wales has the best chance possible of halting and reversing the declines in biodiversity.

I would like to thank the committee for debating this petition and if you require any further information regarding this response please feel free to contact me.

Yours Faithfully



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