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Consultation – summary of responses

Consultation on the Nature Recovery Plan for Wales

December 2014

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Executive Summary

The Nature Recovery Plan (NRP) for Wales will set out the ambition to reverse the decline of biodiversity, the goals we will put in place to achieve that ambition and the actions we will take to achieve those goals.

The consultation on the NRP was open between 10 September and 3 December 2014 and sought views on our proposed ambition, goals and actions, and asked how we could deliver the NRP together to best effect.

Respondents were asked to consider twelve questions and were also given the opportunity to comment on related issues which may not have been specifically addressed in the consultation document. There were 131 responses to the consultation. Almost all responses were received from organisations, groups and individuals either representing, or directly involved in, the environment sector.

The majority of respondents agreed with our proposed ambition ‘to reverse the decline in biodiversity and ensure lasting benefits to society by building the resilience of our ecosystems, by focusing on effective natural resource management.’ Despite the overall support for the direction, there were concerns that natural resource management alone would not deliver the ambition.

Concerns were raised regarding how the NRP relates with the introduction of the Environment Bill and other policies and programmes.

Respondents would like to see recognition of the intrinsic value of nature and not just the financial and economical benefits to conserving biodiversity.

It is important to note that at the time of this consultation the detailed proposed provisions contained in the Environment (Wales) Bill were not publically available, including, for example, how the Bill specifically includes provision on intrinsic value and how biodiversity is being taken forward in Wales through new statutory requirements as part the sustainable management of natural resources.

Respondents also expressed a view that there is a need to continue to focus on priority habitats and species at a local level. Others were of the view that the NRP does not adequately outline an approach to protection and management of important sites, or conservation measures for important habitats and species.

The vast majority of respondents are concerned that the CBD (Convention on Biological Diversity) and EU targets will not be met by 2020 and that any plans of action need to cover a longer timeframe.

Respondents proposed that the revised plan must include a fully funded action plan with SMART targets, actions and monitoring expressed with clear terminology.

By the end of 2015 we will publish:

1. A Position Statement for Biodiversity in Wales, stating our current position

with regard to our biodiversity commitments, resource and policy, and clarifying the relationship between the Nature Recovery Plan and other Welsh Government policies and programmes.

2. An Action Plan, programming priority actions for nature recovery, in the first instance in the areas of improving evidence; increasing engagement and support; restoration of habitats; working with agriculture; and governance arrangements.

1. Introduction

The Nature Recovery Plan (NRP) for Wales will set out the ambition to reverse the decline of biodiversity, the goals we will put in place to achieve that ambition and the actions we will take to achieve those goals.

As part of Welsh Government's renewed approach to enable more joined-up and proactive management of Wales' natural resources, this consultation set out a proposed direction of travel for biodiversity action in Wales, in the context of our commitment to putting in place an integrated approach to Natural Resource Management (NRM), and fulfilling our international commitments under the Convention on Biological Diversity over the next five years.

The consultation sought views on our proposed ambition, goals and actions, and asked how we could deliver the NRP together to best effect.

The consultation was launched on 10 September 2014 and was open for responses until 3 December 2014. There were 12 questions within the consultation document. Responses were received via email and by post.

This document provides a representative summary of the responses and is not an exhaustive record of all the issues raised. Full responses will be published online at www.wales.gov.uk

In total, 131 responses were received. Of these, 47% answered the questions set out within the consultation. The remaining 53% did not directly answer the consultation questions. Responses were submitted by individuals and organisations.

Table 1: Breakdown of responses by respondent type

Individuals	44%
Public Sector	13%
Private Sector	7%
Third Sector	27%
Biodiversity Partnerships	9%

The majority of the 131 responses came from individuals and organisation based in Wales; just 8% of those who responded were from outside Wales.

There were two co-ordinated campaign responses from RSPB Cymru and Wildlife Trusts Wales. Exactly half of the responses from individuals were as a direct result of these campaigns.

2. Key Messages

Support for the general direction

Natural Resource Management (NRM) is supported in principle; however it was strongly felt that NRM alone will not be enough. For example:

“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”. (Gwent Wildlife Trust)

Particularly, given the emphasis on delivery through putting in place effective natural resource management (NRM), there was concern over how this would actually work given the information available at that time.

Terminology

A lot of respondents commented on the language used in the document (these are generalised and have not been attributed to specific responses):

“The language seems over complicated for the general public; the NRP would benefit from clearer and more consistent language.”

“If communities are going to be engaged and enthused, it is absolutely vital that a range of better terminology and language is developed and promoted.”

“The terms ‘building resilience’ and ‘integrated natural resource management’ require definition, and are still not clearly understood in terms of the outcomes they might have for biodiversity.”

It should be noted that definitions and further explanation of the terminology used for Natural Resource Management has now been provided in the Environment Bill and supporting documents

Actions

Almost all of the respondents agreed that the document didn't read like a 'plan' but more like a strategic document and that when the revised document is published it must include a fully funded action plan with SMART targets and actions. In its current form, respondents expressed their concern with the lack of detail in how the NRP is going to be put into action.

Legislation

Many respondents felt that the NERC Duty isn't adequate and needs to be strengthened in the Environment (Wales) Bill. Inclusion of targets within the Environment Bill was also a recurring theme:

“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”. (RSPB Cymru)

It should be noted that the Environment Bill is proposing to repeal and strengthen the NERC 2006 section 40 Biodiversity Duty by introducing a biodiversity and resilience of ecosystems duty for public bodies.

Funding and monitoring

The vast majority of respondents were concerned that without the necessary funding the NRP will fail to reach its targets and outcomes. It was agreed by most that it must be a fully funded plan with monitoring measures.

Timescale

The vast majority of respondents are concerned that the EU 2020 targets will not be met and that any plans of action need to be long-term in order to reverse the decline in biodiversity.

Joined-up working

Respondents welcome Welsh Government’s intention to embed the ecosystem approach across Government.

Intrinsic value of nature

Some respondents (including organisations) felt strongly that the NRP is too fixed on a utilitarian view of wildlife and the natural environment with too little focus on the intrinsic value of nature.

Species and habitats

Many respondents said there was a need to continue to focus on priority habitats and species at a local level. Others were of the view that the NRP does not adequately outline an approach to protection and management of important sites, or conservation measures for important habitats and species. Examples include:

“Explicit reference to the conservation (protection, restoration, and enhancement) of priority habitats and species (including ecological communities/assemblages of species) should [be] include[d] in the final Plan to deliver nature recovery in Wales.”
(WBP Species Expert Group)

“We do not believe that the role of designated sites and species is in need of a fundamental review. We would however support a review that looks into how designated sites and species can be integrated into the natural resource management approach. We believe that designated sites should remain focused on conservation of the important habitats and species which they protect. Designated sites are a huge reservoir of biodiversity and while in some cases they could be

better managed we do not feel that their role needs to be reviewed. Rather, we should be recognising them as gems within the landscape and exploring how through creation of buffers and enhanced connectivity we can make the wider landscape and ecosystems make the work undertaken in them produce benefits beyond their boundaries.” (National Trust)

3. Responses to the Consultation Questions

Question 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?

There was support across a wide range of stakeholders on the focus on addressing the underlying resilience of our ecosystems and identifying and capturing benefits for society.

The Chartered Institute of Ecology and Environmental Management said that *“The proposed ambition to ‘reverse the decline in biodiversity and ensure lasting benefits to society by building the resilience of our ecosystems, by focussing on effective natural resource management’ is very welcome”*.

The Farmers’ Union of Wales supports *“the ambition of building resilient, sustainable ecosystems which supports diverse habitats across Wales. The Union recognises that increasing biodiversity at species and habitats level would contribute to the wider aspirations of Welsh Government’s objective of developing a resilient economy, to manage climate change and to meeting its commitments under the Convention on Biological Diversity”*.

Newport City Council agree *“that building resilience is an important element in preventing further biodiversity loss and that managing resources to allow them to without negative pressures is fundamental for society as well as the economy”*.

Respondents commented that building *‘the resilience of our ecosystems’* is best achieved by taking actions such as preventing them being damaged and fragmented, protecting them from development or disturbance, or promoting and resourcing proper management regimes.

In their response, National Parks Wales said 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”*.

Many respondents said that immediate action is required for species and habitats and that the NRP will not succeed if priority habitats and species are allowed to be lost. The Welsh Government has international obligations on a number of these habitats and species. Some respondents suggested that the ambition should be more in line with the NERC Duty and the Convention on Biological Diversity 2020 targets. The vast majority of respondents felt 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 and that the ambition should be more clearly linked to the Global and EU commitments. Europe in general failed to achieve the 2010 biodiversity targets and respondents felt that the NRP should set out the reasons for this failure, how they affect Wales and how they will be addressed.

The overall ambition of achieving ecosystem resilience by focussing on NRM is a desirable outcome for the broad environment but many felt that this alone will not be enough. Some welcomed the Welsh Government’s ambition to become more

proactive towards nature recovery, leading to a commitment to embed the ecosystem approach across Government and a whole system approach to conservation. Furthermore, 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. Also, many welcomed the plan to promote the value of this approach to the Welsh public and to businesses.

There were many respondents (including many organisations) who felt strongly that the NRP is too fixed on a utilitarian view of wildlife and the natural environment with too little focus on the intrinsic value of nature. Many feel that nature should be allowed to exist for its own sake as much as for the economic benefit of people.

The vast majority of respondents made comments on the terminology used. Requesting, for example, for clarity and definition for: *'No net loss of biodiversity'*, *'reversing the loss'* and *'reverse the decline in biodiversity'*.

The vast majority stressed the importance of a funding strategy to accompany the NRP.

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

A range of respondents said that the ambition statement captured this new approach fully and welcomed the ambition to develop NRM as this will help to move away from simply feature based conservation measures.

The Chartered Institute of Ecology and Environmental Management said that it *"fully agrees that 'our designated sites are the jewels in the crown of our natural environment and need to be core to our refreshed approach.' Since the late 1940s the network of SSSIs across Wales (and the rest of Great Britain) have provided a basic framework of protected high quality habitats with associated rare species. Drawing from John Lawton's Making Space for Nature paper, these sites are crucial to retaining this biodiversity, however, to function correctly they need to be of an adequate size and well connected to other areas of semi-natural habitat. In this state they can then provide an important biodiversity resource and provide real ecosystem service potential, and retain natural resilience to climate change and other natural and man-made impacts"*.

Others said that whilst they support the concepts of building resilience and addressing the whole ecosystem, we need to be wary of holding up NRM as the ultimate solution. 'Traditional' conservation that focuses on species and habitats and has a proven track record of success will be needed to complement NRM.

Again, many respondents stressed that biodiversity means more to society than simply a commodity to be traded and that recognising the intrinsic and non-use value of biodiversity would better reflect the ambitions of the Convention on Biological Diversity. The essential role of biodiversity should be emphasised more strongly.

The South East Wales Biodiversity Records Centre (SEWBREC) said that the strategy *"should have a shorter-term aim of reversing decline and a stated longer-*

term aim of enhancing biodiversity, not just by building ecosystem resilience, but by actually increasing the health of populations of native flora and fauna”.

It was recommended by many that the ambition statement should mirror the international and EU obligations on biodiversity and that it should go beyond 2020 and extend to 2050 as outlined in the Convention on Biological Diversity Strategic Plan for Biodiversity.

Neath Port Talbot County Borough Council said that the plan “*should include a statement supporting and strengthening designated sites*”.

National Parks Wales said that “*reversing habitat fragmentation will be achievable through the simple up scaling 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*”.

Many of the Local Biodiversity Action Plan (LBAP) partnerships agreed that the ambition statement should include reference to public engagement in, and understanding of, biodiversity conservation. For example, Pembrokeshire Biodiversity Partnership said that:

“Without greater public understanding and support, conservation effort will always be marginalised” and that “*mainstreaming biodiversity applies to public attitudes as well as policy making*”.

RSPB Cymru recommended that “*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*”. These comments were echoed by many respondents.

Some respondents, including NFU Cymru, stressed the importance of recognising the contribution that farmers and landowners already make, and will make, to delivering the ambition of the NRP. The Country Land and Business Association (CLA) went on to say that “*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*”.

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

The goals, in principle, have support from many respondents.

For example, The Chartered Institute of Ecology and Environmental Management said that “*the proposed goals to “restore degraded habitats at scale, address key negative factors of biodiversity loss and increase connectivity significantly, improve management of our highest quality environments and achieve ‘no net loss’ of biodiversity’ is also very welcome. Resilience of ecosystems will depend on various factors, especially connectivity and extent, both of which have been seriously compromised by urban development and modern farming techniques*”.

However, many expressed their concern that the NRP includes no details on how these goals might be achieved i.e. through the inclusion of clear targets, timescales, and outcomes.

Some respondents said that 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. Others said that the goals need to be more strategic, robust and clearer and that there needs to be unambiguous references to the direct conservation of priority habitats and species.

The Gwent Wildlife Trust suggested that the following goals should be added: *“To increase biodiversity in areas outside of protected sites; To aid species recovery; To embed biodiversity recovery into all government departments at all levels, and; To engage the public in biodiversity recovery”*.

RSPB Cymru 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) habitats and species (including ecological communities/assemblages of species) to ensure we could see real progress for the recovery of nature”*.

Wildlife Trust Wales (WTW) said that the goals *“are not as strong as they should be and they need to enable and direct strategic delivery and action on the ground. The current goals could be strengthened and made SMART in order to make them more meaningful”*. WTW also suggest that the NRP *“should recommend the full implementation of Professor Lawton’s Report, requiring protected sites to be bigger, better and more connected”*.

NFU Cymru highlighted the role *“that farmers have had in creating, shaping and maintaining the environment of Wales over centuries”*. NFU Cymru endorses principle 11 of the Convention on Biological Diversity which highlights the need to consider all forms of relevant information, including scientific together with local knowledge, innovation and practices.

The Wales Biodiversity Partnership Lowland Grassland and Heathland Ecosystem Group recommended that an additional goal should cover *“public understanding, engagement and participation”*. Many respondents said that raising awareness, education and involving the public in the natural environment is essential. The National Trust agreed, suggesting an additional Goal for inclusion: *“Public understanding, engagement and participation”*. And went on to say that *“there is nothing in the above goals that sets out a pathway for enthusing, educating and involving the public in the natural environment. Actions encompassed by this goal range from early years engagement to higher education funding. At graduate and post graduate level there could be strengthening of the research and monitoring role in the environment that is already taking place”*.

Comments specific to our proposed goals included:

‘Restore degraded habitats at scale’

Some respondents said that this goal needs clarity and that it should include restoration, enhancement and maintenance of habitats and extend to include both habitats and species populations.

‘Address key negative factors of biodiversity loss and increase connectivity significantly’

Interventions and mechanisms will be required to deliver increased connectivity and other key drivers of biodiversity loss need to be addressed. Some respondents suggested that invasive non-native species need to be incorporated into this goal. Others said that the role of agri-environment schemes in species and habitat recovery and connectivity need greater emphasis in the NRP.

‘Improve management of our highest quality environments’

Respondents felt this goal needs clarity and definition. National Parks Wales said that the NRP “*could usefully refer to*” the work of the Joint Nature Conservation Committee’s (JNCC) current revision of the ‘Guidelines for the Selection of [Biological] SSSIs’ that is scheduled for completion by 2017.

‘Achieve ‘no net loss’ of biodiversity’

There was support for this goal, but again, respondents felt this goal needs clarity and definition.

The Wales Biodiversity Partnership Species Expert Group said that they “*would welcome a more ambitious framing of the ‘no net loss’ policy to include ‘net gain’ and a robust mechanism to record biodiversity loss. Habitat re-creation and translocation should be seen as a last resort and not applied to ancient habitats or habitats that cannot be created due to their importance for biodiversity*”.

South East Wales Biodiversity Records Centre said that “*if ‘no net loss’ implies the establishment of a biodiversity offsetting system, then it is an unambitious goal that implies that biodiversity quantity matters more than biodiversity quality*”.

In its response, the National Trust said that “*while we agree that no net loss of biodiversity is desirable we would emphasise that no loss of biodiversity is more desirable*”.

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

The South East Wales Biodiversity Records Centre said that this “*is a laudable goal and one that is essential if we are to have any hope of achieving real benefits for the biodiversity and wider environment of Wales*”.

Question 4 - Are the actions proposed right and adequate?

The vast majority of respondents recommended that the actions need to be made clearer, stronger and more in line with international targets/goals such as the Aichi targets. It was also suggested that detailed consultation with stakeholders on a practical action plan would assist Welsh Government.

Many respondents agreed that monitoring, evidence needs and data sharing need to be improved.

Comments specific to our Proposed Actions included:

'Putting in place effective natural resource management'

Respondents found it difficult to identify from the NRP exactly how natural resource management (NRM) will deliver action for species and habitats. Some said they needed more information.

'Delivering a Welsh National Marine Plan'

The Wales Biodiversity Partnership Species Expert Group said that the *“creation of a robust and ecologically coherent series of marine conservation zones series is required”*. Natural Resources Wales recommended that 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.”*

'Facilitating cross-sector policy integration'

Again, many respondents reiterated that the NERC Duty needs strengthening and embedding into the Future Generations and Well-Being Bill and the Environment (Wales) Bill.

The Wales Biodiversity Partnership Species Expert Group said that *“the focus on integration is important both within sectors and across sectors, in particular agriculture and forestry. WG need to embed the Plan into departmental activities and across public sector bodies”*.

Wildlife Trusts Wales strongly agrees with mainstreaming biodiversity across government, going on to say that *“every government policy, strategy and commitment must contribute to the recovery of nature as part of a strategy for sustainable development that runs through all government considerations”*.

'Funding our partners; and identifying and using other financial instruments'

Many respondents said that biodiversity is under resourced compared to other strands of sustainability. It was recommended that the Welsh Government must utilise other sources of EU funding for nature's recovery.

Respondents suggested that funding should be aimed at specific targets and international obligations with different biodiversity funding streams merged to lessen administration.

Many respondents referred to the Nature Fund in their responses. For example, in its response, Gwent Wildlife Trust said that *“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”*.

In their response to this Action, some respondents expressed concerns about biodiversity ‘offsetting’. Neath Port Talbot County Borough Council said that *“offsetting needs to be delivered on a local basis to ensure that the local biodiversity resource is not adversely impacted and that local communities continue to be able to benefit from their local biodiversity”*. In their response, National Parks Wales said that they *“strongly oppose any form of biodiversity offsetting, which we believe is at odds with the ecosystem approach and is not ecologically effective but highly damaging overall”*.

There was also the recommendation that if there was sufficient capacity to support bids, organisations in Wales could draw down more European LIFE Funding.

‘Reviewing designated sites and species’

Respondents requested clarity over what this meant and recommended that any review would need to be fit for purpose. Some went on to say that a fundamental review wasn’t needed and that instead they would support a review that looks into how designated sites and species can be integrated into the NRM approach.

‘Monitoring and review regulatory instruments’

Some respondents welcomed an audit of regulatory instruments and their impacts on biodiversity. The National Trust said that they *“believe that all regulatory instruments should have a duty to further sustainability including the enhancement of biodiversity”*.

‘Improving the evidence base: research, monitoring and surveillance’

There was support for improving the evidence base that incorporates knowledge and information sets from Welsh Government, Natural Resources Wales (NRW), NGOs, Local Record Centres, the Wales Biodiversity Partnership Evidence Gaps project and Biodiversity Action Reporting System (BARS). Respondents stressed the importance of having appropriate scientific evidence to support any actions on biodiversity that is open and accessible to all.

There was support for Local Records Centres holding the most comprehensive biodiversity database in Wales and some respondents felt strongly that this data should be utilised as much as possible to inform any research, monitoring or surveillance programmes.

Some respondents said that the role of volunteers to record data wasn't acknowledged and should not be over looked.

'Encouraging effective communication and engagement'

Many respondents were disappointed that the work carried out by Local Authorities and Local Biodiversity Action Plan (LBAP) partnerships, in communicating and raising awareness of biodiversity and nature conservation, was not acknowledged in the NRP.

Again, many respondents stressed the importance of more appropriate terminology. For example, the South East Wales Biodiversity Records Centre said that *"if communities are going to be engaged and enthused, it is absolutely vital that a range of better terminology and language is developed and promoted"*.

It was also suggested that at a national strategic level, a revised internal communication programme from Welsh Government and NRW together with a targeted focus on external communication would be welcome. Again, LBAP partnerships were highlighted as experts in doing this at a local level. The Wales Biodiversity Partnership Species Expert Group commented that, at a national strategic level, *"a reinvigorated internal communication programme from Welsh Government and NRW together with a targeted focus on external communication would be welcome. The use and support of existing mechanisms is advised and NGOs' and LBAP partnerships have considerable knowledge and expertise in delivering effective communication and engagement programmes and their continued support is required"*.

'Providing better governance to benefit nature'

There was support from LBAP partnerships for a refresh of the Wales Biodiversity Partnership, including the governance arrangements, to provide clarity and a level of certainty, with financial and strategic support also being required.

Monmouthshire County Council suggested that it *"should be considered whether there could be shared roles in relation to Biodiversity Action between LAs and NGOs such as Wildlife Trusts as seen in England"*.

National Parks Wales said that *"governance and buy-in may be the most critical success factor for the NRP and establishing the ecosystem approach across government"*.

Question 5 - What additional actions would you like to see?

A number of respondents disapproved of the following statement: *'Identify priority species or habitats that society wishes specifically to see benefit from improvements to our ecosystems'* (see page 23 of the consultation document). For example, in its response, The Vincent Wildlife Trust, said they *"would be wary of letting society dictate 'priority species or habitats that society wishes specifically to see benefit from improvements to our ecosystems.'* *These decisions should be led primarily by informed conservation groups, with public consultation and wider awareness work*

addressed as part of the feasibility and implementary process". The Chartered Institute of Ecology and Environmental Management (CIEEM) also suggested caution because *"the general public is often only aware of large charismatic mammals and birds and frequently do not understand the greater benefits delivered by, for example, invertebrates and lower plants"*.

A number of respondents stressed the importance of the NRP being properly funded and said that clarity is needed on this; some suggested that investment is needed in the Wales Biodiversity Partnership.

A number of additional actions were proposed, including:

- *"A robust monitoring strategy for species and habitats"*. (Association of Local Environmental Records Centres)
- *"Site specific and species management: A focus on the most vulnerable, rare and fragmented species and habitats is required to arrest the decline in biodiversity"*. (Wales Biodiversity Partnership Species Expert)
- *"It would be useful to have an additional action that will determine how the Welsh Government will promote an ecosystem based approach to natural resource management across departments and to the public and businesses"*. (Marine Conservation Society)
- *"We would like to see an action relating to all public bodies reporting on their actions in relation to the NERC Duty and sanctions where they have not adequately discharged that duty. An action to support LAs to deliver their biodiversity duty would be helpful"*. (Neath Port Talbot County Borough Council)
- *"NFU Cymru would also identify that a programme of action is required to address Invasive Non-Native Species and other detrimental species which require control such as bracken and ragwort"*. (NFU Cymru)
- *"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"*. (National Parks Wales)
- *"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)"*. (RSPB Cymru)

Some respondents commented on existing and new legislation, and the need to ensure linkages with key statutory instruments, such as the Environment (Wales) Bill and the Well-Being of Future Generations Bill. Wildlife Trusts Wales said that *"alongside new legislation there should be a commitment (including the allocation of necessary resources) to the full implementation of existing natural environment legislation"*.

In its response, RSPB Cymru said that *"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”.

On agri-environment schemes, NFU Cymru stressed *“the need for continued support and a long-term commitment to agri-environment schemes that contribute positively to the protection of landscapes, soils, water and biodiversity with continued access to ALL farmers; together with support to invest in the latest beneficial technologies and techniques such as precision farming and winter storage reservoirs to help farmers better manage their inputs and secure essential supplies”.*

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

Respondents suggested that the business community should be invited to attend national conferences such as the Wales Biodiversity Partnership Conference. The Association of Local Environmental Records Centres said that it is *“crucial to ensuring that businesses not only appear green, but also contribute to the delivery of biodiversity related ambitions, in ensuring they are using the best possible evidence to make their decisions”.* Gwent Wildlife Trust suggested that there *“needs to be widespread education and promotion of biodiversity within the business sector, using exemplar projects to demonstrate real business benefits”.*

Some respondents said that a strategic steer to businesses from Welsh Government would be welcomed and that Welsh Government could offer a suite of measures to business including advice on environmental issues, incentives to work with NGOs and recognition of best practice. In their response, Tidal Lagoon Power said that they *“would encourage demonstration of innovative approaches, collaboration and partnership with business to deliver outcomes. Frameworks that enable innovation and proactive or flexible approaches should be considered, as should streamlining of processes. A helpful approach to engagement might be to improve understanding of the business sector perspective”.*

On enforcement, Neath Port Talbot County Borough Council suggested that in order to encourage businesses to be greener *“there needs to be an incentive[s] or a sanction[s]”* in place. National Parks Wales said that *“regulation must be enforced, and penalties must be meaningful, otherwise they are simply accommodated as a cost of doing business”.*

Some respondents expressed their disappointment that there was little reference to Glastir or agri-environment schemes in the NRP. The Farmers Union of Wales said that some of its members *“felt that farmers’ existing efforts to manage the land in a sensitive sustainable manner was not recognised. It should be recognised that most farmers in Wales are not interested in food production only, to the exclusion of everything else”.*

A recurring theme was that there is a large and valuable resource of knowledge and expertise at a local level and that the Welsh Government must do more to engage effectively with private landowners.

Question 7 - How can we strengthen the way we work together?

In its response, the Wildlife Trust of South and West Wales said there was a need to *“make longer term commitments to key projects and partnerships”*. Many respondents commented on the need for greater networking and clearer, transparent and increased communication from Welsh Government to ensure people are aware of Government proposals and can provide their views.

Neath Port Talbot County Borough Council said that there was a need to *“acknowledge that the LBAP system works on a basic level and that the LA officers have a vital role in steering LBAPs and as go between from LBAPs to [Wales Biodiversity] Strategy Board”*. Commenting on the local level, Torfaen County Borough Council said that *“only through a clearer picture of how biodiversity actions are implemented at a local level and the constraints that exist, can a plan actually reflect a realistic approach to reversing biodiversity declines”*.

In its response, the Farmers Union of Wales suggested that *“more sustainable environmental benefits would be realised if more land managers had the opportunity to engage in the consultation and programme design processes between government and the industry in the first instance”*.

On responding to public consultations, Wildlife Trusts Wales said that *“often, it is difficult to see if significant contributions [by Wildlife Trusts] on Welsh Government consultations have made a difference to the outcome. Therefore, to encourage increased participation and enthusiasm, the Welsh Government should highlight how contributions have been considered even if this is via an informal conversation”*.

Some respondents commented on the role of the Wales Biodiversity Partnership (WBP). The WBP Species Expert Group said that *“a strong and effective WBP with a clear mandate will help with the delivery of the Nature Recovery Plan”*. Others suggested that the Welsh Government needs to do more to facilitate dialogue with the NGO sector and that expert opinion provided is given recognition and feedback on how this has shaped policy decisions.

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

Respondents said that the Welsh Government needs to financially support, in the medium to long-term, existing partnerships and collaborate with business.

RSPB Cymru said that *“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?”*

On current and future grant funding, in its response, Rhondda Cynon Taff County Borough Council said that Welsh Government grants *“for all sectors should take into account biodiversity requirements (as per NERC) and ensure that applicants are not penalised due to seasonality requirements”*. This was seconded by Neath Port Talbot County Borough Council: *“Grants for infrastructure, regeneration, health projects and businesses could include biodiversity requirements”*.

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

Respondents suggested there needs to be better communication between funders and policy makers, including communication of successes and failures so lessons can be learned; more efficient planning; clarity of who is tasked for each outcome, and; support for Local Record Centres and the Biodiversity Action Reporting System.

As with responses to other questions, many respondents said that the sector is poorly funded. For example, Rhondda Cynon Taff County Borough Council said that *“if Welsh Government do believe that biodiversity underpins all other sectors then why is the sector so poorly funded?”*

In its response to this question, RSPB Cymru commented on existing and forthcoming legislation:

“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. 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 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”.

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

Most respondents welcomed the idea of an Information Hub and agreed that it could be an effective way of monitoring and evaluating biodiversity across Wales. However, some were not aware of it and a few confused it with the Wales Environment Research Hub¹.

Some respondents however expressed concerns that this is an example of duplication because Local Records Centres already have in place an online data delivery system. The National Trust recommended that the Information Hub *“should build on the work of Local Record Centres and the National Biodiversity Network”*.

¹ The Wales Environment Research Hub helps to co-ordinate environmental research in Wales to strengthen the evidence base for the Welsh Government: <http://www.werh.org/>

There were a number of other recommendations and suggestions, including:

- *“We recommend that Welsh Government instigate a standard format for data collection and collation across Welsh Government and Natural Resource Wales”.* (Marine Conservation Society)
- *“Access to academic studies can be very important particularly where guidance is lacking”.* (Monmouthshire County Council)
- *“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”.* (National Parks Wales)
- *“We would suggest that in designing a more powerful system, which for instance may give live access to data, it is important to agree the appropriate access and not just rely on having access to the data as being sufficient”.* (COFNOD)
- *“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”.* (Gwent Wildlife Trust)
- *“The Wales Environmental Hub should work in partnership with Wales Biodiversity Partnership, Wales Environmental Link and Local Records Centres to disseminate data and evidence to wider partnerships”.* (Wildlife Trusts Wales)

Question 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?

Respondents suggested that targets should be ambitious but achievable. Recognising that many of the actions will be medium to long term deliverables, they suggested that an annual reporting system will help ensure targets are kept on track; within a five year programme, annual milestones can be included and reported on. Wildlife Trusts Wales suggested that *“reporting cycles should be aligned with the UK, EUBS and CBD reporting cycles (which links to a longer term vision) with an annual action plan and separate progress report”.*

Some respondents recommended that a clear and concise plan of how the ambition will be delivered is needed and that it should include Specific, Measurable, Achievable, Realistic, Time-Related (SMART) targets agreed by those who will deliver them.

Question 12 - Additional Issues / Comments

The general consensus amongst the vast majority of respondents was that the NRP needs to be more ambitious in its targets and very clear about how its effects are measured. Respondents stressed what they saw as the huge gap between the development of the NRP strategy and the actual changes on the ground that are needed. Many said that urgent work is needed if we are to achieve the changes that

are needed. Some were of the view that Welsh Government needs to set an example before it can expect others to do the same.

Most respondents agreed in principle with NRM but were concerned, or did not understand, how it would be put into practice.

Many responses said that The Environment (Wales) Bill should be used to strengthen the biodiversity duty (section 40) of the Natural Environment and Rural Communities (NERC) Act 2006.

4. Next steps

Having read and analysed the responses to the consultation, we recognise there are a number of key and recurring themes, as outlined in the key messages section, above including calls for further clarity on biodiversity policy and action and how for example this will be implemented as part of Welsh Government's commitment to putting in place an integrated approach to Natural Resource Management (NRM).

It is important to note that at the time of this consultation, specific information on the proposals for natural resource management, was limited to that contained in the Government's Green and White paper consultations. Detailed proposed provisions have since been set out in the Environment (Wales) Bill and supporting documents introduced to the Assembly in May.

As we move forward to address many of the issues highlighted by this consultation we will be working with the Wales Biodiversity Strategy Board through a number of task and finish groups to plan implementation. These will include opportunities under the Rural Development Programme; addressing evidence gaps; priorities for restoration of habitats; public engagement, and the governance arrangements around delivery.

We have been consistently clear that we are committed to move beyond merely halting the decline of biodiversity in Wales by putting in place a new approach that helps to enhance biodiversity which is framed by the following;

The Well-being of Future Generations (Wales) Act 2015

The Well-being of Future Generations Act came into force on 29 April and will apply to public bodies in Wales. In adopting fully the principles of sustainable development, we must recognise the need to tackle long-term trends and the root causes of the strategic challenges we face. This is why the Well-being of Future Generations (Wales) Act 2015 includes the resilience of ecosystems as one of the seven Well-being Goals. –‘A nation which maintains and enhances a biodiverse natural environment with healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change (for example climate change).’

The Environment (Wales) Bill

There is an international recognition of the need for a more joined-up approach to managing our natural resources, recognising that our water, land and air are all interlinked and our economy, society and environment are all interdependent. The Environment (Wales) Bill will seek to establish legislation that enshrines the principles of the UN's Convention on Biological Diversity by adopting an ecosystem approach to achieve the sustainable management of natural resources in Wales. It seeks to tackle long-term trends and the root causes of biodiversity loss by addressing these within whole system approaches that deliver lasting benefits to communities and the economy as well as for the environment and nature. This approach is being increasingly recognised internationally as best practice.

The Bill also replaces the existing duty in section 40 of the Natural Environment and Rural Communities Act (NERC) 2006 in relation to Wales, with a strengthened duty on public authorities to seek to 'maintain and enhance' biodiversity.

A Natural Resources Policy statement is being prepared, which will identify the priority actions Welsh Government will take to address the root causes of biodiversity loss through integrated natural resource management and which will inform the Nature Recovery Plan.

By the end of 2015 we will publish:

- A Position Statement for Biodiversity in Wales, stating our current position with regard to our biodiversity commitments, resource and policy, and our current and proposed action to reverse the loss of biodiversity in Wales. The statement will clarify the relationship between the Nature Recovery Plan and other Welsh Government policies and programmes, particularly the Well-being of Future Generations Act, and the Environment (Wales) Bill, and state how the Aichi biodiversity targets will be addressed in Wales. This statement will form the strategic part of the Nature Recovery Plan for Wales.
- An Action Plan, programming priority actions for nature recovery, in the first instance in the following areas:
 - improving our evidence, understanding and monitoring;
 - identifying priorities for restoration of habitats;
 - increasing engagement and support to mainstream biodiversity throughout decision making at all levels;
 - identifying opportunities for biodiversity under the RDP and working with agriculture strategy
 - ensuring good governance arrangements for delivery within the developing policy landscape.

The Action Plan will form the delivery part of the Nature Recovery Plan for Wales.

Annex: List of Respondents

Individuals

- Alec Dauncey
- Anne Brenchley
- Annie Halliwell
- Anonymous (x2)
- Barbara Symons
- Barry Lynes
- Betty Lee
- Blaise Bullimore
- Ceri Thomas
- Chris Taylor
- Christine Matthews
- Claire Baker
- David Griffiths
- Dawn Thomas
- Delcie Simkin
- Denbeigh Vaughan
- Dick Finch
- Doug Bennett
- Elinor Evans
- Fiona Openshaw
- Frances Cattanach
- G Wattle
- Godfrey Bradshaw
- Gordon Parfett
- Hilary Wilson
- Hugo Burke
- Ian Morris
- Ian Palmer
- Jim Davies
- John & Gillian Cooke
- John Bowers
- John Bratton
- John Goodwin
- John Hubert
- Jonathan Stone
- K.J. and R.H. Regelous
- Kate Gibbs
- Ken Maurice

- Kenneth Simkin
- Louise Gorrigan
- Malcolm Appleton
- Mick Green
- Mr and Mrs Smith
- Mr R W Dennison
- Mrs L Jones
- Pamela Hymphries
- Pat Armstrong
- Paul King
- Rachel Tindall
- Ray Chesters
- Roger Pawling
- Sally Hall
- Simon Bazeley
- Tessa Pearson
- Verity Picken
- Veronica Haines
- Wendy Scrase

Public Sector

- Association of Welsh RIGS Groups
- Carmarthen Bay and Estuaries European Marine Site Relevant Authorities Group
- Ceredigion County Council
- Crown Estate
- Joint Nature Conservation Committee
- Monmouthshire County Council
- National Parks Wales
- Natural England
- Natural Resources Wales
- Neath Port Talbot County Borough Council
- Newport City Council
- North Wales Biodiversity Officers
- Pembrokeshire County Council
- Rhondda Cynon Taff Council
- Sustainable Places Research Institute
- Torfaen County Borough Council
- University of Dundee

Private Sector

- Capita
- Confederation of Forest Industries
- Dŵr Cymru
- Farmers Union of Wales
- Institute of Civil Engineers Wales
- NFU Cymru
- RWE Generation UK plc
- Tidal Lagoon Power

Third Sector

- Alliance for National Parks Cymru
- Amphibian and Reptile Conservation
- Association of Local Environmental Records Centres
- Bat Conservation Trust
- Biodiversity Information Service - Powys & Brecon Beacons National Park
- Biodiversity Information Centre - West Wales
- British Association for Shooting and Conservation
- British Dragonfly Society
- British Wildlife Management
- Bumblebee Conservation Trust
- Chartered Institute of Ecology and Environmental Management
- Cofnod - the Local Records Centre for North Wales
- Country Land and Business Association
- Coed Cadw
- Coed Cymru
- Edward Llwyd Society
- Elan Valley Trust
- Game and Wildlife Conservation Trust
- Gwent Wildlife Trust
- Llais y Goedwig
- Marine Conservation Society
- National Gamekeepers' Organisation
- National Museum Wales
- National Trust
- Plantlife Cymru (on behalf of Plantlife International)
- Powis Castle Estate
- RSPB West Glamorgan
- RSPB Advisory Committee for Wales

- RSPB Cymru
- SE Wales Biodiversity Records Centre
- Snowdonia Society
- Vincent Wildlife Trust
- Welsh Ornithological Society
- Whale and Dolphin Conservation
- Wildlife Trust of South and West Wales
- Wildlife Trusts Wales
- Woodland Strategy Advisory Panel

Biodiversity Partnerships

- Blaenau Gwent Biodiversity Partnership
- Bridgend Biodiversity Partnership
- Cardiff Biodiversity Partnership
- Carmarthenshire Biodiversity Partnership
- Newport Biodiversity Partnership
- North East Wales Biodiversity Network
- Pembrokeshire Biodiversity Partnership
- Wales Biodiversity Partnership Lowland Grassland and Heathland Ecosystem Group
- Wales Biodiversity Partnership Species Expert
- Wales Biodiversity Partnership Upland Ecosystem Group