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## Welsh Government Consultation – summary of responses

Welsh Seabird Conservation Strategy

Date of issue: 2025

Mae'r ddogfen hon ar gael yn Gymraeg hefyd / This document is also available in Welsh

## **Overview**

This document provides a summary of responses to the consultation on proposals to introduce the Welsh Seabird Conservation Strategy. We would like to thank all respondents for sharing their views with us.

## **Action Required**

This document is for information only.

## **Further information and related documents**

Large print, Braille and alternative language versions of this document are available on request.

## **Contact details**

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## **Additional copies**

This summary of responses and copies of all the consultation documentation are published in electronic form only and can be accessed on the Welsh Government's website.

Link to the consultation documentation: [Welsh seabird conservation strategy | GOV.WALES](https://gov.wales/Welsh-seabird-conservation-strategy)

## **Introduction**

In late 2024, the Welsh Government consulted on its proposals to introduce the Welsh Seabird Conservation Strategy (The “Strategy”). The consultation ran between 18 December 2024 closing on 14 February 2025. The consultation document explained why we were proposing to introduce the Strategy, detailing its objectives, scope and process for identifying recommendations. Included with the consultation was the seabird species cards, which are an important element of the vulnerability assessments. Further details of these can be found on the Welsh Government website.

## **Overview of responses to consultation**

There were a total of 20 responses to the consultation. These include full and partial responses (this accounts for some questions being unanswered).

The consultation response forms were available in Welsh and English and with individuals able to response in their preferred language. Responses were split between the two languages below

Welsh	0
English	20

Respondents were able to respond using the Welsh Government’s consultation webpage or download a response form and submit it to a designated electronic mailbox. An overview of the split in these responses is included below.

Responses submitted online	12
Responses submitted via email	8

A breakdown of the type of respondent is provided below:

Type of organisation	Number of responses
Member of public (not affiliated with a group)	4
Non-Governmental Organisation	6
Other public sector organisation	3
Local Authority/Local authority representative group	2
Consultants	2
Anonymous	2
Education	1

## **Consultation responses**

### **Question 1. Do you agree with the objectives set out in the Strategy?**

	Yes	No	No Answer
Numbers	15	2	3
Percentage	75%	10%	15%

The majority of respondents (75%) were in favour of the objectives set out in the Strategy document. Of those who are in favour, a large proportion agreed with the importance of the objectives with some going further and calling for the inclusion of an action plan. Other respondents emphasised the importance of the objectives being underpinned by a strong evidence base.

One respondent agreed with the objectives but caveated with some suggestions. For example, they are calling for a “long term” funding mechanism within one of the objectives. Another respondent, called for objective 4 to go beyond setting out recommendations, instead calling for them to be underpinned by an “action plan with SMART targets” enhancing the recommendations.

Of those respondents who responded with no answer, some general support was shown for the objectives, however one respondent expressed concern about the suitability of evidence which underpins the vulnerability assessments.

Of those respondents who responded with no to the question, no further detail was provided.

### **Question 2. Do you agree with the methodology used to undertake the vulnerability assessments (including sensitivity and exposure assessments)?**

	Yes	No	No Answer
Numbers	12	3	5
Percentage	60%	15%	25%

Responses to this question were mixed with the majority (60%) in favour. Several respondents noted the similarity in the methodology used in both this Strategy and the English Seabird Conservation and Recovery Pathway (ESCaRP) and agreed this was the right approach for Wales.

One respondent agreed with the methodology and sought more clarity on how seabird disturbance would be assessed noting this as a concern. Another respondent agreed in part to the vulnerability assessment process, however, they highlighted the process does not allow “for how vulnerable seabirds will be to future change” or “threats outside of Welsh waters” recognising the migratory lifecycles of some species included in the Strategy.

Of those respondents who responded no to the question (15%), one respondent was concerned with how the fishing sector was represented in the sensitivity assessments captured in the species cards accompanying the consultation document. Further concern was highlighted with the term 'fishing' being used to represent both commercial and recreational fishing.

Of those respondents who responded no answer to the question (25%), no further information was provided.

### **Question 3: Do you agree with the implementation period for the Strategy?**

	Yes	No	No Answer
Numbers	8	6	6
Percentage	40%	30%	30%

Responses to this question were mixed with no distinctive majority, however, 40% did agree with this question. A significant proportion of respondents didn't express a clear view to this question in addition to those who responded no.

Of those who responded yes to this question, one respondent stated they agreed with the question, however they would like to see "a flexible emergency review option". Another respondent also supports the proposed approach to implement the Strategy stating "the implementation approach seems sensible and appropriate, and support the proposed 10-year lifespan for the Strategy, to align with existing marine assessment review cycles".

Of those who stated no, one respondent agreed with the rationale of the implementation period however they stated the "implementation of the strategy should be maintained through regular working group meetings".

Those respondents who provided no answer to this question did not provide further comments.

### **Question 4. Do you agree with the process to identify recommendations?**

	Yes	No	No Answer
Numbers	9	7	4
Percentage	45%	35%	20%

Responses to this question were split between yes and no, with a slight majority (45%) answering yes. Of those answering yes, one respondent agreed with the proposal however, they urge "implementations to be well resourced and funded and to be delivered quickly". Another respondent was broadly in agreement with the

proposal, calling for “further detail to explain the process used to identify recommendations” in the Strategy document.

For those respondents who disagreed with the proposal, one respondent stated that they would give “top priority for protection to the Atlantic puffin... and roseate tern” due to the population “they knew to be increasing in Wales and to the one [species] they knew to be the rarest in Wales”. Another respondent also disagreed with the proposals stating “there is insufficient detail provided”, however, they would be “happy to collaborate with the Welsh Government and others” to develop recommendations.

Those respondents who neither agreed nor disagreed didn’t explicitly leave any comments.

**Question 5: We've asked a number of questions, but are there any other issues you'd like to mention here?**

Responses to this question covered a variety of subject areas in relation to the Welsh Seabird Conservation Strategy.

Many respondents took the opportunity to welcome the development of the Strategy and the opportunity to respond through the consultation. Several responses focused on the recommendations and/or actions which were referenced in the consultation but is acknowledged as a next step. Respondents called for SMART targets to underpin the recommendations, and stressed the importance of long-term, dedicated funding streams to support the Strategy.

Respondents agreed with and emphasised the importance and evidence based approach to underpin the recommendations within the strategy. Others also expressed the need for regular monitoring to build confidence in the evidence base.

Some responses focused on the need for the Strategy to be flexible and adaptable. This relates back to similar comments raised under Question 3, highlighting the need for a mechanism to allow the functions of the Strategy to be flexible, responding to emergencies and un-predictable pressures.

Respondents highlighted the need for the Strategy to integrate with other plans and policies at regional, national and international levels, with some respondents highlighting migration and foraging areas meaning increased overlap with other areas.

Some respondents called for effective stakeholder engagement as part of the implementation of the Strategy, seen as crucial to its success, bringing together expertise and local knowledge.

**Question 6: We would like to know your views on the effects that this strategy would have on the Welsh language, specifically on opportunities for people to**

**use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?**

**and**

**Question 7: Please also explain how you believe the proposed strategy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.**

Respondents to these two questions covered a number of themes relating to the Welsh language.

Some respondents welcomed the inclusion and promotion of the Welsh language used in the Strategy. It was highlighted as important to ensuring the language remains a key tool for discussing, understanding and protecting the marine environment.

Others highlighted the cultural identity of the language and how it relates closely to our natural environment with an emphasis on coastal communities. Some comments related to the need to align with Y Mor a Ni – Wales Ocean Literacy Strategy.

Respondents highlighted the importance of inclusion of the Welsh language in a scientific and policy context to enrich the language and its application.

### **Government response and next steps**

We welcome all responses made to this consultation. On balance, we accept that most responses were broadly in favour of the Strategy and its intentions, however, we recognise some very specific concerns raised by some respondents.

To that effect, we have made some minor changes to the wording in the Strategy to strengthen and add clarity to some areas which had been raised by some respondents. A summary can be found below:

We have added some extra detail to clarify how the vulnerability assessments were undertaken and recognise that publishing the sensitivity assessments in this consultation without the full exposure assessments may have caused some confusion.

We have also added further detail on how we will identify and set out our recommendations following the completion of the vulnerability assessments.

Alongside publishing this Government response, Welsh Government will now formally publish the Welsh Seabird Conservation Strategy and will also be publishing

the first iteration of recommendations, with accompanying actions. Detail on how the recommendations were determined will be included as an annex to the Strategy.

We once again thank all those who took the time to respond to this consultation.