

AIDAC

Asesydd Interim Diogelu'r Amgylchedd Cymru

IEPAW

Interim Environmental Protection Assessor for Wales

Lessons Learned Report



Contents

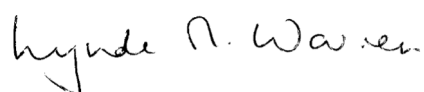
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Foreword from the Interim Assessor

Dr Nerys Llewelyn Jones was appointed as the Interim Environmental Protection Assessor in March 2021. She was joined in May 2024 by two deputy assessors, myself and Anna Heslop. I took over from Nerys in March and we were joined by John Henderson, our new deputy assessor.

A large part of this report is based on Nerys's experience as the Interim Assessor as she was the only person to have been in post from the beginning. The appointment of the deputies led to some changes in the way of working and we have also drawn on this experience where appropriate.

Nerys, Anna, John and I hope that the lessons we have learned will be of value to those responsible for establishing the new statutory body that will replace us.





List of Abbreviations

CCEIC	Climate Change, Environment and Infrastructure Committee
EC	European Commission
ESS	Environmental Standards Scotland
EU	European Union
IEPAW	Interim Environmental Protection Assessor for Wales
NRW	Natural Resources Wales
OEP	Office for Environmental Protection



1 Introduction

This report has been drawn up in response to the following recommendation made by the Climate Change, Environment and Infrastructure Committee (CCEIC) in its Report on Operation of Interim Environmental Protection Measures, 2023-2024¹

The IEPAW should produce and publish a “lessons learned” report, based on her experience of the interim arrangements, to inform the transition to a permanent governance body. The Welsh Government should commit to publishing a response to the IEPAW’s report.

The report provides a brief overview of the background to the IEPAW and its role before going on to consider the lessons we have learned in trying to fulfil this role. These lessons include comments on obstacles that have arisen and how we have addressed these. We also highlight those aspects of the operation of IEPAW that have worked particularly well.

The lessons learned can be grouped under several, somewhat overlapping headings: Independence, Resources and Powers and Accountability. Drawing all these lessons together, we make the following recommendations:

Independence

The new body must have sufficient independence over its own functions and administration to be effective and efficient. We do not consider this to be possible if those functions are delivered by the Welsh Government.

¹ Report on operation of interim environmental protection measures, 2023-2024 (October 2024), Welsh Government, Recommendation 7.

Resources

The new body must be sufficiently resourced to deliver its mission and the mission must match its resources. It will not be possible to deliver environmental oversight effectively for the Welsh environment and public on a shoestring.

Powers and Accountability

The new body must be given sufficient powers to deliver its mission effectively. The limited powers provided under the interim arrangements have demonstrated that wider powers are needed.

2 Background to the IEPAW

When the UK was a Member State of the European Union (EU), the European Commission (EC) had powers to hold the UK Government to account where there were alleged failures in the application of environmental law. These powers included being able to refer matters to the European Court of Justice for possible legal action against the UK. The British public (including non-governmental organisations) were able to raise matters with the EC. Statutory bodies to provide an alternative mechanism in place of that previously undertaken by the EC have been established in England, Northern Ireland and Scotland.² The IEPAW was set up to provide a partial stopgap between the end of the EC's oversight of environmental law and the introduction of permanent statutory measures for Wales. The Welsh Government intended the IEPAW to be in place for a short time whilst arrangements were made for a new permanent, statutory body to be established. The initial appointment of the IEPAW was for a term of two years with the option to renew for a further year although this has now been extended to ensure that there is no gap before establishment of the permanent body.

The IEPAW's remit³ is not the same as that of its partner organisations. It was set up, primarily, to: provide members of the public with a mechanism to raise submissions about the functioning of environmental law in Wales. It will further provide for those submissions to be considered by an Interim Assessor, who will advise the Welsh Ministers if the submissions raised are valid and make recommendations for any action they consider may need to be taken.

The IEPAW's main purpose is to:

- provide oversight of the functioning of environmental law in Wales; and

² The Office for Environmental Protection (OEP) for England and Northern Ireland and Environmental Standards Scotland (ESS) for Scotland.

³ Terms of Reference of the IEPAW, 2021, Welsh Government

- consider systematic issues relating to the working/functioning of environmental law in Wales.

Because the IEPAW is a non-statutory body, it can only act in an advisory capacity and does not have the enforcement powers available to the OEP and ESS. It is not able to consider:

- breaches in environmental law;
- areas of non-compliance with environmental law; or
- issues raised that are covered by another complaints mechanism or process.

The IEPAW's aim is to identify where action may need to be taken to correct functioning issues that will improve environmental outcomes. Its strategic objectives are to:

provide a service to the public that allows them to make submissions to the IEPAW;

advise the Welsh Ministers on any action that may be required;

and contribute to the development of the permanent approach to environmental governance in Wales.

3 Independence

The Welsh Government is committed to establishing an independent, permanent statutory environmental governance body. One of its functions will be to hold the Government to account. It must, therefore, be free to act without government interference. The same cannot be said for the IEPAW because it does not have formal powers of investigation and enforcement.

However, while the Cabinet Secretary for Climate Change is responsible for setting the IEPAW's strategic objectives and aims, there have been no directions as to how the role of Interim Assessor should be carried out. From its inception, the IEPAW has operated on the understanding that it is free to give independent advice to Welsh Government and neither the Interim Assessor nor the Deputies are Welsh Government employees.

Unfortunately, the independence of our advice has not been matched by independence in the running of the organisation. Secretariat support is provided by Welsh Government. Although the two full time members of the Secretariat act exclusively for the IEPAW, they are Welsh Government employees and their working practices are governed by Welsh Government. The need for them to comply with all Welsh Government policies and procedures, coupled with our position as independent advisors has created a number of problems that have impacted on the IEPAW's ability to plan for and carry out its work efficiently. These include issues with:

- email addresses
- web page
- social media
- information management systems
- student placements.

3.1 Emails

Correspondence for the attention of the Interim Assessor is addressed to the IEPAW@gov.wales email account. This account is monitored daily by the IEPAW Secretariat. The Secretariat also uses this account to provide briefings and support to the Interim Assessor and Deputies and to provide stakeholders and submitters with responses to their queries and with news of any forthcoming events.

These emails are sent from the IEPAW account and are retained in line with Welsh Government policy which also allows all Secretariat staff to access historical information for continuity and audit purposes.

As the Interim Assessor and Deputies are not employed by the Welsh Government, they do not have gov.wales email addresses. Considerable efforts have been made to procure dedicated email addresses. These have not been successful so far, however, because of the complications arising from the complex nature of the relationship between the Welsh Government, the Interim Assessors and the Secretariat. The Interim Assessor and Deputies have therefore had to use their personal email addresses. This restricts their access to some electronic resources including the IEPAW inbox.

This is far from ideal and a solution to the problem has been requested since the IEPAW was established. It is a potential security risk and can slow down email correspondence and occasionally results in emails not being received.

It also has an impact on responses to Freedom of Information requests since not all emails are stored on Welsh Government servers. Additionally, where Freedom of Information requests are received, they are dealt with through internal Welsh Government procedures and the IEPAW has no control over the responses.

3.2 Web Page

The IEPAW does not have its own website. An internet search for IEPAW takes the reader to an IEPAW web page hosted by the Welsh Government.⁴ This gives a brief explanation of the role of IEPAW with a link to its Terms of Reference and to a submission form for those wishing to report an issue to us. There are also sections on publications and announcements. Some important documents, including the prioritisation principles, can only be located by the link to 'view all latest'. The IEPAW's status as an advisory body acting independently of the Welsh Government is not made clear and the reader could easily come to the conclusion that the IEPAW is a Welsh Government body.

We have no control over the format of the web page. Although we can submit material to be added to it, we cannot add it ourselves. Furthermore, we have found that the material we do submit is likely to be reformatted to meet the Welsh Government house style. When our Autumn 2024 newsletter was uploaded, the IEPAW artwork and all photographs had been stripped away with only the text remaining. We believe that a dedicated website would have gone some way towards raising our profile with the Welsh public.

3.3 Raising Awareness of the IEPAW

Publicising the existence of the IEPAW and its role has been a challenge both within the Welsh Government and externally. Although, as noted below, we have an excellent relationship the Welsh Government policy team working on the Environment (Principles, Governance and Biodiversity Targets) (Wales) Bill our role is not well understood across Welsh Government departments

Externally, the onus has been on the public to obtain information about the existence of the

⁴ <https://www.gov.wales/interim-environmental-protection-assessor-wales>

IEPAW and the services offered. Following the appointment of the two Deputies in May 2024 and the accompanying additional resources it was agreed that we needed to develop and implement an effective communications strategy. The IEPAW does not have the resources to do this without external support. However, our dependence on Welsh Government administration means that accessing this support has not been straightforward. We have had to follow the Welsh Government's procurement requirements. Whilst these ensure transparency, accountability and value for money, they have also presented obstacles to addressing this issue quickly. Having to rely on approved suppliers and to follow the internal processes has both limited the range of possible suppliers that can be approached and added to the administrative burden of arranging bids. The former has resulted in insufficient interest being expressed to allow the IEPAW to obtain appropriate services. Given the resources available to the IEPAW, the latter issue has proven problematic since it has taken up significant staff time.

The use of social media to publish information about an organisation is now common practice. It has been difficult for the IEPAW to do this partly because of the lack of resources (discussed below), but also because of the constraints imposed by the Welsh Government.

We decided that LinkedIn would be the most appropriate social media channel for the IEPAW but could not set up an account without obtaining prior approval from Welsh Government. This led to delays of several months.

3.4 Information Management Systems

When the IEPAW was established, it was not expected to be in place for long and no information management system was put in place. This was not a problem while the amount of material was small. However, as the Secretariat and the volume of material grew, information management became a serious issue.

It was agreed that an IEPAW information infrastructure should be set up. The fact that the Interim Assessor and, in due course, the Deputies were not Welsh Government employees and did not have access to Welsh Government systems meant that arms-length arrangements had to be made.

The solution has been to organise IEPAW's information across multiple platforms with the Welsh Government hosting the primary digital resources and the Interim Assessors working remotely without secure access to these resources.

The information management system, Objective Connect, was installed and is being used as a secure information sharing tool alongside Welsh Government's network. In theory, Objective Connect allows the Interim Assessor and Deputies to access information quickly and easily. Work can be shared collaboratively across this platform securely, ensuring the IEPAW complies with data protection requirements. However, the complexity involved in operating Objective Connect alongside the Government system places great demands on the Secretariat. For the most part, the system has worked well but there have been occasions when the Assessors have been unable to find information or open files. We have often had to call on the expertise of the Secretariat to help us navigate the system. There have been occasions where our efficiency has been adversely affected by the failure to access information.

3.5 Student Placements

The IEPAW has benefited from the Welsh Government's student placement scheme. We are grateful for the opportunity to participate in this scheme. The recruitment process is run by the Welsh Government and IEPAW's involvement is limited to interviewing candidates it considers may be suitable from a list forwarded to it. For various reasons outside IEPAW's control, there can be delays in recruiting students. This can make it difficult for us to plan the way we will use a

student's expertise and means we cannot rely on having their support when needed. It can also affect budget planning. We understand that sometimes delays may be inevitable; the main issue for us is the uncertainty this causes.

Dependence on the Welsh Government's administrative systems for electronic communication and information management has constrained the ways in which IEPAW has been able to operate. We believe we would be more efficient if we had full responsibility and control of our own systems.

Dependence on the Welsh Government's arrangements for procurement has limited our ability to recruit third party support.

4 Resources

The IEPAW's activities have been constrained by limited resources both in terms of manpower and funding, especially in relation to communications.

4.1 Ways of Working

The IEPAW provides a link between members of the public and the Welsh Government on matters relating to the functioning of environmental law. Although it has a duty to advise the Welsh Government, there is a strong focus on the public facing side of its work, from encouraging people to submit their concerns through to engaging with others to gather information to inform its advice.

When the IEPAW was set up, submissions were accepted by email directly to the IEPAW inbox. This led to lengthy email conversations to obtain the necessary information to evaluate submissions. A significant number of early submissions were also deemed outside of the scope of the IEPAW. It was concluded that there was a lack of clarity about the information required and the scope of the IEPAW's role.

To address this, a submissions form was developed. This clarified the sorts of issues that could be submitted. It also provided a clear framework for submitters to ensure that sufficient information was provided when they first contacted the IEPAW. The IEPAW has also published prioritisation principles which explain how it decides which submissions to prioritise.⁵

Providing clear information to the public on the sorts of issues that the IEPAW can (and cannot) consider and on how they can submit a concern to us has improved the quality of the submissions we have received and simplified the process of determining how we should address them.

⁵ <https://www.gov.wales/interim-environmental-protection-assessor-wales-iepaw-prioritisation-principles>

Although the use of the submission form has made it easier to process submissions, it has not solved all the problems. Most of the submissions we receive have been made by people with little or no knowledge of how environmental law works in practice. The IEPAW quickly realised that working with people to gain a greater understanding of their concerns from a legal perspective was essential.

The IEPAW team has had to devote time to gain an understanding of the legal issues behind concerns raised by the people making submissions and cannot rely on them to provide a clearly defined case for investigation.

Although the IEPAW can investigate any aspect of the functioning of environmental law in Wales, its work has been guided by the submissions it has received. Its major investigations have all been instigated in response to submissions.

Where the IEPAW considers there is a need to obtain a wide range of views on an aspect of environmental law it may decide to issue a Call for Evidence. The initial analysis of the responses has usually been undertaken by third party organisations commissioned by the IEPAW, usually academic institutions. The drafting of recommendations and the final report is carried out by the Assessors.

Engaging with other public and non-governmental environmental bodies in Wales has been a core activity for the IEPAW from the outset. The main way in which we engage with these stakeholders is through our quarterly online stakeholder meetings. These are regarded as a good means of engagement by both the IEPAW and the stakeholders. We have also hosted in person events in a variety of venues including the Royal Welsh Show.

The IEPAW also produces a newsletter several times a year which is made available through Welsh Government's IEPAW web page. It is also forwarded directly to those on the IEPAW stakeholder mailing listed and will be posted on LinkedIn.

4.2 Human Resources

The IEPAW was created with limited resources. Until May 2024 there was a single Interim Assessor working for a minimum of 20 days a year. Dr Nerys Llewelyn Jones, who held the post until the end of February 2025, was initially appointed for two years. The expectation was that the need for the IEPAW would be short-term pending the creation of a permanent body and the role was resourced accordingly. It is now expected that the IEPAW will remain in existence long enough to ensure an efficient transition to the new body. The appointment of two Deputy Assessors in May 2024, each working for a minimum of two days a week, has increased the capacity of the IEPAW but the IEPAW role still amounts to less than one full time post.

The provisions for secretarial support have changed over the years. There are currently two full time members of the Secretariat with additional part time support from another Welsh Government employee. Much of their time is spent on arranging meetings, corresponding with those making submissions to the IEPAW and liaising with Welsh Government officials leaving little time for investigative work and report drafting. A particular limitation of the current structure is the lack of legal expertise or appropriate environmental and ecological knowledge amongst Secretariat staff. Ideally, the Secretariat should be responsible for reviewing submissions and advising the Assessors on whether they are within remit and, if so, how the issues raised might best be addressed. In practice, much of this work has to be done by the Assessors, taking up time that would otherwise be spent on addressing investigations and writing reports.

The OEP has set up a College of Experts comprised of individuals with knowledge in environmental law and science to provide it with advice. The IEPAW is not able to call on the College of Experts and does not have the resources to set up a similar body. However, the IEPAW has been able to draw on the knowledge and expertise of external bodies such as Natural Resources Wales (NRW) to provide information needed to enable us to evaluate submissions. They have also been able to provide additional information on request.

The IEPAW's latest Annual Report includes sections detailing impact monitoring and internal scrutiny of performance. While we acknowledge the importance of providing this additional information, developing and testing a simple but informative way of demonstrating impact has taken up time that could otherwise have been devoted to preparing advice on specific topics.

The production of reports has been delayed by lack of resources. The IEPAW published its first report, on the Retained EU Law (Revocation and Reform) Bill, in February 2023. Two further investigations were started in 2021 and one in 2022. We are disappointed that we have not been able to meet expectations for reporting on these investigations. Two reports (trees and woodlands and protected sites) have still not been completed. Support from student placements and external contracts to universities has provided essential input by collating evidence and carrying out additional legal research but the time needed to bring this together and formulate recommendations exceeds the time allocated to the Assessors. The situation was particularly difficult when there was only one Assessor. Even with two further Assessors progress has been slow. The slow pace means that we are continually having to update drafts to take account of recent developments. At the same time, we have to address issues raised in new submissions.

The underlying problem here is a lack of capacity. A single assessor working for a minimum of 20 days a year could not possibly deal with all the submissions in a timely way and even with the appointment of the two deputies each working for two days a week, there is still only the equivalent of about one full time post to deal with nearly 40 submissions, engage with the public and stakeholders and provide advice to the Welsh Government. The problem is exacerbated by other factors including:

- lack of legal support in the Secretariat
- delays in recruiting student interns
- time spent on overseeing administrative activities including development of a communi-

cation strategy

- periods of ill health, notably Covid.

The time taken to produce our reports may result in them having less of an impact. It has also made the task of writing them more complicated because of the need to take account of new developments as they arise.

There are other ways in which lack of resources has affected our work. As noted above, the main way in which we engage with stakeholders is through our quarterly online stakeholder meetings. These are relatively easy to organise but we do not have the resources to provide support for individuals with visual or audial impairments. We do not have the resources to accommodate mobility difficulties at the outdoor events we have held at nature reserves, sewage treatment works and on farmland. Whilst we have tried to ensure in person events are as accessible as possible, we have had to be pragmatic. In some cases, access challenges have been insurmountable and beyond the control of the IEPAW.

We have not always been able to publish the newsletter as regularly as we would like. It has been a frequent challenge to meet publication schedules. The need for clearance by the Interim Assessor before translation and formatting can be arranged has been hampered by the time allotted to the role. Higher priority issues have limited the time available for this process. Consequently, publication schedules have had to be delayed with contents carried over to the next newsletter.

4.3 Communications Strategy

Effective communication is essential for the IEPAW to be able to fulfil its purpose of providing members of the public with a mechanism for raising submissions about the functioning of environmental law.

The IEPAW is committed to providing current information about its activities. Until recently, however, it has not been able to apply a strategic approach to communications. Our means of engaging with stakeholders has largely arisen on an ad hoc basis and been refined through learning what works best. We now take a more strategic approach to communications. We do not have sufficient resources or the necessary expertise to do this without assistance and have used external bodies to assist us. Managing these contracts, including commenting on the material delivered has taken up a lot of secretarial time. One of the Deputies has taken on the role of overseeing communications. We are pleased that the IEPAW now has a LinkedIn presence but note that managing that presence will take time away from the preparation of reports.

The development of a communications strategy has been long overdue. We believe that, given sufficient resources and greater control over how these are deployed, the IEPAW's profile would be raised.

5 Powers and Accountability

The IEPAW can only provide advice to the Welsh Government. Unlike its partner organisations it cannot take enforcement action where it considers that a public body has failed to comply with environmental law.

The reason for the limitation to our powers is not because holding Government and others to account is not considered to be important. The Welsh Government's wish to set up a mechanism as quickly as possible to enable members of the public to draw attention to concerns about the functioning of environmental law meant that this had to be done without any statutory backing.

As a short-term measure, these arrangements did at least ensure that there was some mechanism in Wales for the public to voice their concerns but in no way can it provide an adequate substitute for the powers that were available prior to Brexit.

For the most part, the non-statutory status of the IEPAW has not affected our relationship with other bodies but this is not always the case. We were initially denied membership of a UK-wide forum on contaminated land, for example, because we are not regarded as equivalent to OEP and ESS.

We fully expect that this issue will be addressed in the legislation to create the statutory governance body. The IEPAW has always acknowledged its limitations in this respect. We believe that our stakeholders understand this.

We do have concerns, however, over our lack of power to do many of things we would like to do. These mainly relate to our quasi-independent status which leaves us free to give advice as we choose but imposes conditions and insurmountable constraints on the way we operate.

5.1 IEPAW Accountability

Under its Terms of Reference, the IEPAW is required to provide an Annual Report on its progress. To date three such reports have been submitted to the CCEIC. The process of producing these reports has changed over the years. Information is collated throughout the year so that the final production of the Report is relatively straightforward. These are subject to scrutiny by the Committee and the Welsh Government and inform discussions during the appearance of the Interim Assessor and Deputies before the Committee. The requirement reflects the need to provide transparency and accountability regarding the activities of the IEPAW. Following recommendations from the Committee, the latest report includes sections detailing impact monitoring activity and internal scrutiny of performance.

The production of the Annual Report has been greatly simplified by bringing together information throughout the year and we would recommend a similar approach is adopted.

6 What Has Worked Well

6.1 Public and Stakeholder Engagement

One of the strategic objectives of the IEPAW is to provide a service to the public that allows them to submit their submissions. The importance of engaging with stakeholders and the wider public has been regarded as an essential part of the IEPAW's role from the outset and we have worked hard to provide effective ways in which this can be done. Our stakeholders include public bodies in Wales including, for example, NRW and national park authorities, private bodies which exercise a public function, such as Dŵr Cymru, and range of non-governmental organisations with interests in the environment and/or farming. We are also pleased to have received submissions from members of the public who are not necessarily affiliated to any of these organisations.

There is an opportunity to put questions to or raise issues directly with the Interim Assessor and Deputies in all our stakeholder events. There are no constraints on what can be raised in these forums beyond the requirement that they must relate to the functioning of environmental law.

Since invitations to stakeholder events are freely available, any member of the public can access this facility. The only constraints on access are physical capacity of venues for in person events or requesting a Teams invitation for online events. This ensures equality of access to all events organised by the IEPAW and enables participants to raise matters with us directly.

Stakeholder engagement has been invaluable to the work of the IEPAW. It has enabled us to keep abreast of current concerns about environmental matters and to provide information about our activities. We use a mix of approaches including both online and in person events and a regular newsletter.

6.2 Collaboration with Partner Environmental Governance Bodies

The IEPAW has an excellent relationship with its partner environmental governance bodies. We engage in regular online meetings to update each other on specific work areas and meet in person annually with their board members and senior staff. The IEPAW is involved in collaborative work with the OEP on cross border issues including Special Protection Areas and water quality in rivers and has benefited from sharing both legal and scientific knowledge which the IEPAW might have struggled to access. In some cases, OEP and/or ESS have published reports on issues of relevance which have provided an excellent building block for our investigations meaning that we have not had to commission reports independently. Discussions around similarities and differences between approaches in England and Wales have also served to highlight the strengths and weaknesses of different approaches.

The IEPAW's collaboration with its partner environmental governance organisations has been invaluable to its work.

6.3 Relationships with Welsh Government Policy Teams

We also have excellent working relationships with Welsh Government policy teams. The detailed understanding of ongoing activity across the Welsh Government together with awareness of options being considered to develop Welsh environmental law have proven invaluable as the IEPAW has evolved. Teams have been able to provide a detailed historical context as well as pointing to relevant work across the Welsh and the UK Governments. This has allowed the IEPAW to progress activity confidently, avoiding pitfalls and duplication. We have been able to draw on work in development elsewhere instead of dedicating our own scarce resources to it. Furthermore, teams have been able to provide a critical perspective on IEPAW thinking, improving the quality of work and the appropriateness of recommendations to Welsh Ministers. There have been no

attempts to unduly influence the IEPAW, however. Both sides have been aware of the need manage the relationship carefully to ensure this does not happen.

Having good working relationships with Welsh Government policy teams has enabled us to keep abreast of developments in a rapidly moving field of environmental policy.

7 Conclusion

Since its establishment in 2021, the IEPAW has provided scrutiny of environmental law in Wales and advice to Welsh Ministers. It has also provided a mechanism for members of the public to raise issues about the functioning of environmental law in Wales. The IEPAW has provided a limited stopgap for environmental governance in Wales but it is fundamentally different from environmental governance bodies in the rest of the UK and from the permanent body to be created under the forthcoming Environment (Principles, Governance and Biodiversity Targets) (Wales) Bill.

Because there are only three of us working as Interim Assessors, we are involved in all aspects of the work of the IEPAW and have therefore been able to draw on our collective experience to outline some key lessons learned. We appreciate that the circumstances under which the Interim Assessors have operated, including the limited resources and the need to operate under the auspices of the Welsh Government in a number of areas are not intended to apply to the new permanent body. We nevertheless think it will be useful moving forward for there to be broad understanding of the issues that have faced IEPAW.

Of particular importance are those lessons relating to stakeholder engagement. The new body is likely to encounter a broad constituency with varied understanding of environmental law. Effective engagement and dialogue across the diverse range of stakeholders has been highlighted as a key achievement of the IEPAW in feedback. Opportunities to be updated by the Interim Assessors and to put questions or concerns to them have benefited both stakeholders and the IEPAW. Given the strength of feeling about environmental issues, there have been clear benefits to this approach. We strongly believe that the new body should build on the good relations that we have been able to establish.

There are ambitious expectations for the new environmental governance body for Wales. We strongly welcome these and would love to see the body operating in a comparable way to its partner organisations. We recognise, however, that the organisation's capacity will

be much more limited. The most important lesson we have learned is that the role of the organisations needs to be matched against the resources it needs to carry out this role. There is no point in establishing a body with comprehensive powers if it is not resourced well enough to use them effectively.

