

Evaluation of implementation of the Section 6 Biodiversity Duty

Mae'r ddogfen yma hefyd ar gael yn Gymraeg.

This document is also available in Welsh.

Evaluation of implementation of the Section 6 Biodiversity Duty

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Glossary

Acronym/Key word	Definition
ENRaW	Enabling Natural Resources and Wellbeing Scheme
LNP	Local Nature Partnership
NRAP	Nature Recovery Action Plan
NRP	Natural Resources Policy
NRW	Natural Resources Wales
PSB	Public Service Board
RAG	Red, Amber, Green
SDCC+	Sustainable Development Coordinators Cymru Plus
SMNR	Sustainable Management of our Natural Resources
SoNaRR	State of Natural Resources Report
WFG	Wellbeing of Future Generations
WLGA	Welsh Local Government Association

1. Introduction

1.1 OB3 Research, in collaboration with BRO Partnership, was commissioned by the Welsh Government to undertake an evaluation of the implementation of the section 6 biodiversity duty (the duty).

1.2 The aims of the evaluation were to:

- establish the extent to which the duty has been implemented/complied with in the first three years, through the production of plans and reports, and/or through mainstreaming action across organisations
- investigate the enablers and barriers to its implementation
- establish to what extent the guidance provided has been useful, has been followed, and what further guidance and/or support could be provided.

1.3 The objectives of the evaluation were to:

- establish the numbers of public authorities who have published plans and reports
- investigate the reasons why public authorities have not published plans and/or reports, if that is the case
- establish to what extent the plans and reports align with the requirements of the duty, and whether they follow the guidance and use the objectives of the Nature Recovery Action Plan (NRAP) for Wales
- establish the extent to which public authorities have adapted their management and corporate frameworks to ensure biodiversity is adequately considered in decisions and service delivery
- establish how biodiversity considerations are communicated within organisations e.g. to members, leaders, voters and citizens at a local level

- investigate the extent to which actions for biodiversity are embedded across the functions of the organisation
- investigate the enablers and barriers to implementing the duty
- explore whether new ways of working have been developed to comply with the duty
- identify what are the key actions that public authorities can take to improve compliance with the duty and mainstream biodiversity actions
- recommend what further guidance, support, training or other action is needed to enable this
- provide examples of best practice and case studies showcasing what success looks like in terms of mainstreaming biodiversity action.

1.4 This report sets out the findings of the desk review and fieldwork with public authorities covered by the duty.

1.5 This report is presented in seven chapters as follows:

- chapter one: this introduction to the report
- chapter two: outlines the study methodology
- chapter three: provides background and an overview of the duty
- chapter four: presents the findings of the evaluation in terms of compliance with the duty
- chapter five: considers the enablers and barriers to implementing the duty
- chapter six: presents the findings of the study on the difference made to public authorities and enhancing biodiversity
- chapter seven: presents our conclusions based on the study findings and offers recommendations for the Welsh Government to consider.

2. Methodology

- 2.1 This chapter sets out the method deployed for undertaking the evaluation, including the number and profile of public authorities who engaged with various elements of the research. This chapter also considers some of the key methodological issues faced by the evaluation team.

Method

- 2.2 The study was undertaken between April and June 2021. It involved the following elements of work:
- an inception stage, which included a virtual inception meeting with a Welsh Government official and the preparation of an inception report setting out a refined methodological approach and project plan
 - preparation of research instruments, including a bilingual web-based survey (see Annex A), a discussion guide for interviewing representatives from public authorities (see Annex B) and a template for analysing section 6 plans and reports prepared by public authorities
 - desk-based research, which involved a review of relevant Welsh Government policy documents and documentation, such as guidance, relating to the duty
 - receiving a database with contact data for 125 public authorities from the Welsh Government. For organisations where no contact data was made available, efforts were made to source an appropriate contact email address
 - distributing the web-based survey to all public authorities and receiving a total of 52 survey responses. Three responses were submitted in Welsh and the remaining 49 in English
 - accessing documentation (be that a plan and/or report, published or not published) for a total of 58 authorities. The documentation was

sourced via a mix of approaches including accessing plans/reports published on the Wales Biodiversity Partnership's website¹ (34 public authorities), submitted survey responses² or via a public authority website search. The plans/reports were analysed in terms of quality, comprehensiveness, adherence to the guidance and alignment with NRAP objectives. A RAG³ status system was adopted to make an informed assessment against the guidance requirements

- interviewing 31 representatives from a total of 29 public authorities. These representatives were primarily ecologists, biodiversity officers, environmental officers or policy compliance officers
- receiving a written statement or information by email from three authorities (who had not contributed in any other way to the review)
- interviewing representatives from the Welsh Local Government Association (WLGA) and One Voice Wales
- facilitating three focus group discussions with attendees of the following networks:
 - the all-Wales Local Nature Partnership (LNP) Network⁴
 - the Sustainable Development Coordinators Cymru Plus (SDCC+) Network
 - one Local Nature Partnership
- synthesising the findings of the fieldwork and desk-review and drafting of this report.

¹ [Wales Biodiversity Partnership - Biodiversity Duty Reporting \(biodiversitywales.org.uk\)](https://biodiversitywales.org.uk)

² Public authorities could either upload their plan/report to the survey or share a link to a published plan/report

³ A Red/Amber/Green traffic light system to analyse the quality of the project documentation evidence available

⁴ [Local Nature Partnerships Cymru - Home \(lnp.cymru\)](https://lnp.cymru)

Methodological considerations

2.3 The following issues need to be considered in relation to the methodology adopted for this study:

- all interviews were undertaken by phone or virtually via Microsoft Teams to minimise face-to-face contact during the coronavirus (COVID-19) pandemic and to adhere to Welsh Government guidance on conducting research at this time. This approach worked well and offered greater flexibility for participants to have a discussion with a member of the research team
- the number of interviews planned (at 40) was not fully achieved despite efforts to contact all public authorities by email (and phone in most cases) on several occasions
- our intention was to undertake interviews with Chief Executive Officers and/or Chairs of public authorities but in the event, only one such interview was undertaken. In all other cases, our requests for interview (and completing the survey) was delegated to suitable officers. This is an important finding in itself and provides an insight as to those who are most informed of the duty across public authorities. Interview contributors primarily were:
 - governance and compliance officers
 - corporate services managers
 - policy officers
 - environmental, conservation and sustainability officers
 - biodiversity officers and ecologists
 - estate and property managers
- over the course of the study it became apparent that two public authorities (the Police and Crime Commissioner for Dyfed-Powys and Police and Crime Commissioner for Gwent) were not included on the Welsh Government's database of public authorities.

However, they were later approached as part of the evaluation, and one contributed to the study

- two public authorities listed on the Welsh Government's database have merged into a single authority (Severn Trent Water and Hafren Dyfrdwy)
- two entries on the database were for the same public authority (Boundary Commission for Wales)
- in response to being approached to contribute to the evaluation, two of the public authorities set out in the Welsh Government's database responded stating that they did not consider themselves to be a public authority. These were:
 - Parc Prison, Bridgend
 - Equality and Human Rights Commission
- A number of the public authorities listed in the database shared with the research team are exempt from publishing a plan under the duty due to them not being a stand-alone authority or a Ministry of the Crown. Our analysis of the database provided would suggest that 16 entries could be classified as government departments rather than a public authority, although it is not always straightforward to define an organisation as one or another. In three cases, identified below, public authorities did contribute in some way to the study and their feedback has been considered:
 - Agricultural Land Tribunal
 - CADW
 - Department for Work and Pensions
 - Health and Safety Executive
 - Intellectual Property Office (*responded to the survey*)
 - Land Registry
 - Law Commission

- Local Government Boundary Commission for Wales
(*responded to the survey*)
 - Mental Health Review Tribunal for Wales
 - Ministry of Defence
 - Ministry of Justice
 - National Commission for Infrastructure for Wales
 - Planning Inspectorate (*provided correspondence*)
 - Residential Property Tribunal Wales
 - The Adjudication Panel for Wales
 - Visit Wales
 - Wales Office
 - Welsh Internal Drainage Advisory Committee
- taking all this into consideration means that the number of public authorities within scope for the review was 110⁵. The number of public authorities who contributed in some way to the study was 72, representing approximately two-thirds of those within the scope of the duty. A third of all public authorities, at 38, did not contribute in any way to the study.

⁵ Including the three authorities classified as government departments above and who responded in some way

3. Policy context and overview of the duty

- 3.1 This chapter sets out a review of key Welsh Government policy documents which are relevant to the Environment Act and the duty. It also provides an overview of the guidance in place relating to the duty.

Introduction

- 3.2 The Welsh Government's response to a decline in biodiversity and the loss of species and habitats was set out in a legislative framework, starting with the overarching **Wellbeing of Future Generations (Wales) (WFG) Act 2015**. This required the public sector 'to improve the economic, social, environmental and cultural well-being of Wales in accordance with the sustainable development principle.' Within the Act there are seven goals and five ways of working that all public authorities must strive to adhere to. Public authorities must also participate in the Public Service Board (PSB) for their area, with each responsible for undertaking an assessment of wellbeing in their area and preparing and publishing a Wellbeing Plan.

The Environment (Wales) Act 2016

- 3.3 The **Environment (Wales) Act 2016** was introduced to better manage natural resources in a sustainable way and to safeguard and build the resilience of natural systems.
- 3.4 Part 1 of the Act included the framework for the Sustainable Management of our Natural Resources (SMNR) comprising:
- the State of Natural Resources Report (SoNaRR), published by Natural Resources Wales (NRW) in 2016
 - the Natural Resources Policy (NRP), published by Welsh Government in 2017
 - and Area Statements, published by NRW in 2020.
- 3.5 Section 6 of the Environment Act put in place an enhanced biodiversity and resilience of ecosystems duty for public authorities, which required that they must **seek to maintain and enhance biodiversity in**

exercise of their functions, and in so doing, promote the resilience of ecosystems, so far as consistent with the proper exercise of those functions. To comply with the duty, public authorities must embed the consideration of biodiversity and ecosystems into their day-to-day activities, policies, plans, programmes, and projects.

- 3.6 The section 6 duty requires each public authority, which is not a Minister of the Crown or government department, to prepare and publish a plan, and then to report every three years to show what they have done to comply with the duty. The first reports from each public authority were due in 2019.

Reporting guidance

- 3.7 In 2019, the Welsh Government published guidance for public authorities⁶ to assist them in meeting the reporting requirement of the duty. The guidance sets out that reporting should not be burdensome and should be proportionate to the size and type of organisation.

- 3.8 The guidance set out that public authorities were awarded flexibility in the form that their section 6 report could take, e.g., it could be incorporated into an annual report or be a stand-alone document:

‘Best practice would be that reporting is part of their ordinary reporting systems and/or processes, such as their annual report, demonstrating how the consideration of biodiversity is being embedded within the public authority.’⁷

- 3.9 The guidance suggested that public authorities subject to the Wellbeing of Future Generations Act could report against the duty as part of their reporting against the wellbeing objectives of that Act whilst those whose statutory remit focused on biodiversity e.g. NRW, could embed their reporting against the duty into annual reports.

⁶ [Wales Biodiversity Partnership - Biodiversity Duty Reporting \(biodiversitywales.org.uk\)](https://biodiversitywales.org.uk)

⁷ Environment (Wales) Act 2016 Part 1 Guidance for Section 6 – The Biodiversity and Resilience of Ecosystems Duty Reporting Guidance p. 4

- 3.10 The guidance provided a reporting template for authorities to adopt, should they wish, which set out the basic information which would be beneficial to collect and report upon. The main themes set out within the template were:
- an introduction to the public authority, its functions and governance in relation to biodiversity
 - highlights, key outcomes, and issues
 - key enablers and barriers to implementing the duty
 - action reporting, adopting each of the five NRAP objectives
 - how they are meeting the six objectives of the Nature Recovery Action Plan (NRAP) in terms of:
 - embedding decision-making
 - protecting species
 - enhancing habitats
 - identifying key pressures
 - collecting robust evidence and
 - establishing a framework for governance.
- 3.11 The duty encourages the embedding of biodiversity at the corporate level, with the ultimate responsibility vested with Chief Executives and Chairs of public authorities.
- 3.12 Section 6 lists the wide range of public authorities which the duty applies to. They include Welsh Ministers, public bodies, holders of public office and statutory undertakers. They also include a range of organisations such as local authorities, local health boards, national health trusts, national park authorities and local town and community councils. The list is vast and varied and there is considerable variation in the degree to which public authorities can undertake actions which reflect the duty. To aid this process, organisations can categorise themselves into one of three groups, set out at Figure 3.1, so that

action for biodiversity can be proportionate to the size and type of organisation.

Figure 3.1: Types of public authorities and possible actions to be carried out relative to their function

Group 1

Public authorities that own or occupy an office building only and whose functions are not directly connected to biodiversity and/or land management. Actions related to buildings management, procurement, sustainability, awareness raising, training, or in partnership with other organisations

Group 2

Public authorities that own, occupy or manage land, their own buildings and grounds, whose functions are connected with biodiversity and/or land management, or that can influence those who own or manage land. As per Group 1 above PLUS grounds management, cascading funding criteria, providing education and training.

Group 3

Public authorities that own or manage land beyond their own grounds, whether their functions relate to biodiversity and/or land management or not. As per Groups 1 and 2 above PLUS land management to maintain and enhance biodiversity and promote the resilience of ecosystems.

- 3.13 For some, there may be relatively few ways in which their day-to-day activities impinge upon biodiversity – and as a result mean that they find it more challenging to identify actions and changes which they can report upon or fail to see the imperative of doing so even though it is a legal requirement. For others, notably local authorities, the range of different activities that could be reported on is vast and complex. Biodiversity in each geographical area is also subject to wider influences, often outside the immediate control of that authority, e.g.,

climate change or agricultural practises. Whilst this complexity might hinder some local authorities in complying with the legal requirements of reporting it could on the other hand provide greater opportunities to engage in activities which benefit biodiversity.

4. Compliance with the duty

Key findings

- The evaluation found that 62 public authorities had prepared at least one document (a plan or report) in line with the requirements of the duty. Of these 26 public authorities had prepared both a plan and report.
- Most of the plans/reports reviewed are standalone documents. Very few plans/reports are embedded into corporate documents although this is suggested as good practice by the guidance.
- There is good level of awareness and involvement with the duty amongst those public authorities who engaged with the review. The profile of those who have engaged with the study is skewed towards those who have made most progress.
- The process for producing and approving plans and reports has varied across public authorities, with a single officer often taking this responsibility.
- Most of the plans and reports considered as part of this evaluation were found to be very or fairly comprehensive and some three-quarters of reports were found to adhere to the guidance provided.
- Strong plans/reports are those which are well considered, informed by clear evidence, easy to read, well laid out, highly visual, make clear reference to NRAP objectives and contain specific and measurable actions and achievements.
- Weaker plans/reports tend to be briefer and less well considered, more akin to a policy statement than an action plan, and overly focused on wider environmental actions rather than specific biodiversity actions.

- 4.1 This chapter considers the findings of the fieldwork in relation to how many public authorities have published plans and reports and the general progress made in respect of compliance with the duty.

Public authorities who have published plans and report

- 4.2 Overall, the study found that 62 public authorities have prepared either or both a plan and report, suggesting that just over half of all public authorities comply with the duty. They include three plans/reports which were not approved at the time of conducting the fieldwork as well as one plan/report which had been approved but not published.
- 4.3 In four cases we were unable to access the plan/report. In three of these cases, the authority did not share documents with the research team; and in the fourth, the link provided only contained an overview rather than the full report. As such our document analysis is based on a total of 58 public authorities reports/plans.
- 4.4 As shown at Table 4.1, 45 public authorities had produced a plan and 39 had produced a report. The vast majority of documents prepared by public authorities and reviewed as part of this study are standalone ones (50 of the 58). In all, 19 authorities had prepared a plan only and 16 authorities had prepared a report only. Around half of authorities, 26 authorities, had prepared both a plan and report (in eight cases this was a combined document).

Table 4.1: Section 6 plans and reports prepared by public authorities

Type of document	Number
Standalone plan only	15
Standalone plan and standalone report	14
Standalone report only	13 ⁸
Combined standalone plan and report	8
Embedded plan only	4

⁸ One of these authorities also had an embedded plan in place but this was not sourced as part of the research.

Embedded plan and report	4
Total	58

- 4.5 Plans or reports which are embedded into other documents, tend to be referenced as part of the full report in corporate plans, corporate strategies, management plans, annual reports, and environmental reports.
- 4.6 It is known that 38 public authorities have published either or both of their section 6 plan/report(s), as the research team has been able to source a document in the public domain via the authority's website or the Biodiversity Partnership website.
- 4.7 Table 4.2 sets out our analysis of plan and report comprehensiveness. Most of the plans and reports produced by public authorities are considered by the research team to be either very or fairly comprehensive. Some quarter of the plans and some 15 per cent of the reports assessed were not considered to be comprehensive.

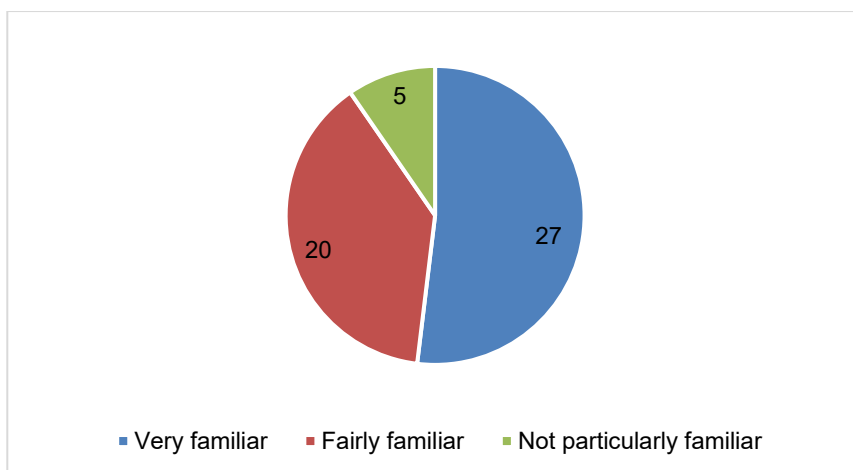
Table 4.2: Analysis of public authorities' plans and reports

	Number of plans	Number of reports
Very comprehensive	29	25
Fairly comprehensive	5	8
Not particularly comprehensive	11	6
Total	45	39

Public authorities' level of involvement with the duty

- 4.8 Most surveyed public authorities (47 of the 52 respondents) were either very or fairly familiar with the duty. As shown at Figure 4.1, very few (five respondents) were not familiar with the duty, suggesting that the profile of those who completed the web survey tended to be those who are actively involved with this area of work.

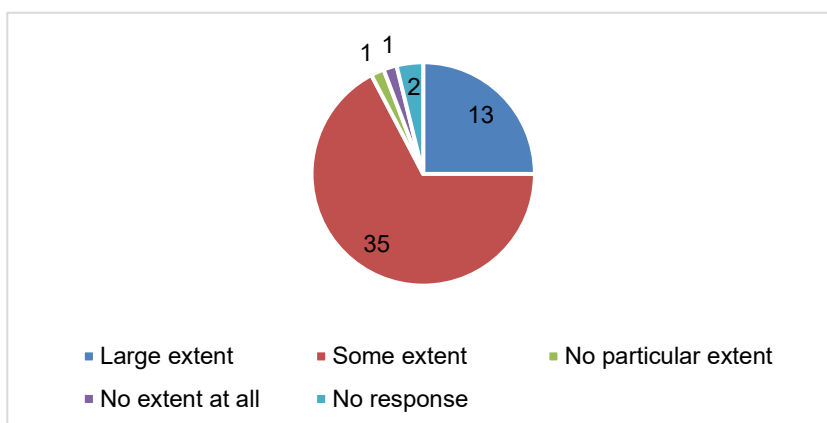
Figure 4.1: Public authority respondents' level of familiarity with the duty



Source: OB3 Survey (52 respondents)

- 4.9 The majority of those interviewed had been heavily involved with the duty and were well informed of it, often having been involved with the duty since the outset. Most had been actively involved in the drafting of the plan or report and considered themselves to be the ‘lead’ from within their organisation. A minority of those interviewed were less informed about the duty and these tended to be individuals from authorities which did not have a plan or report in place. These also tended to be from authorities which did not have a biodiversity or ecology officer in place.
- 4.10 A high proportion of surveyed authorities (48 respondents) had also embraced the duty either to some (35 respondents) or a large (13 respondents) extent, as shown at Figure 4.2. Only two surveyed authorities had not embraced the duty to any extent.

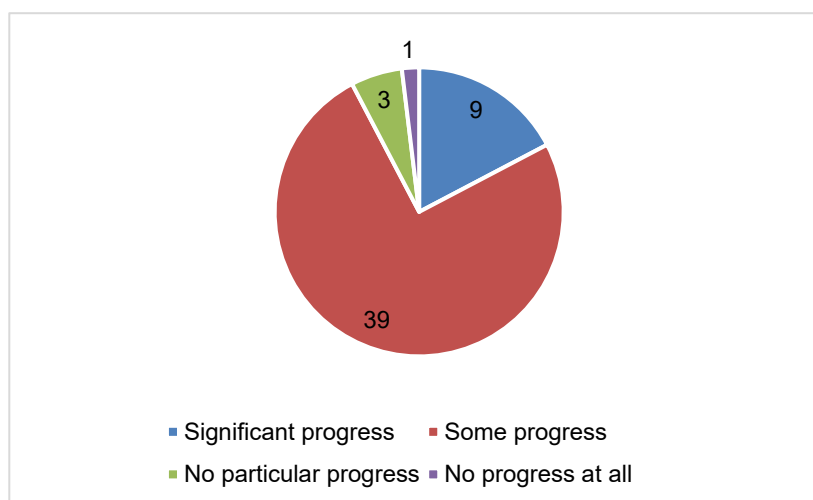
Figure 4.2: Extent to which public authorities have embraced the duty



Source: OB3 Survey (52 respondents)

- 4.11 In the same manner, the vast majority of surveyed public authorities (48 respondents) thought that they had made either some (39 respondents) or significant (nine respondents) progress in respect of the duty.

Figure 4.3: Progress made by public authorities in respect of the duty



Source: OB3 Survey (52 respondents)

- 4.12 When asked about the level of progress made by their organisation in respect of its duties under section 6, the main achievements identified by interviewed public authorities was that they had prepared plans and/or reports and therefore complied with the duty.
- 4.13 Feedback from those interviewed suggested that in four cases, plans and/or reports had been prepared, often in 2019, but had not been approved for publication by the appropriate board or committee. The COVID-19 pandemic was identified as the main reason why these plans and/or reports had not been put forward for formal approval. It was not unusual therefore to hear that these plans/reports were now being put forward for formal approval e.g., during one discussion it emerged that one authority's report 'was only approved yesterday'.
- 4.14 Other areas of progress in relation to the duty identified by interviewed public authorities involved raising awareness of the duty across the organisation, mapping out existing activities relating to biodiversity and identifying opportunities for further work in this area. Several public

authorities also observed that the focus of the duty on planning and reporting was enabling them to report more formally on biodiversity actions being carried out across their organisation.

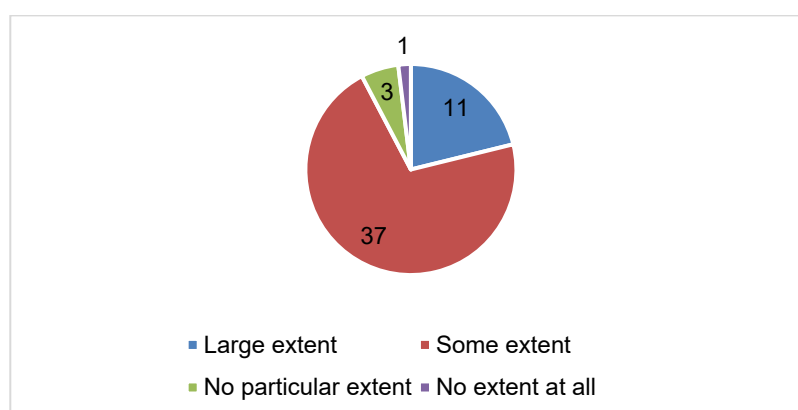
- 4.15 A small number of public authorities found it more difficult to pinpoint the progress made by their organisation in relation to the duty as they felt they were 'doing a lot anyway' in this area of work. In these cases, progress was thought to be about better evidencing and reporting upon the actions which were already being undertaken by the organisation.
- 4.16 Others which considered that their authority had only managed to undertake some progress believed that the work was being driven by key individuals, rather than the whole organisation. Only in one public authority had the lead operating officer taken responsibility for the duty themselves and contributed to the evaluation.
- 4.17 Other public authorities had made less progress, primarily because they were unsure whether their organisation was within scope of the legislation. In some of these cases, the advice received from Welsh Government had been that it was up to the public authority to decide if they were within scope. Two public authorities who contributed to the interviews were aware of the duty but were not aware of the need to prepare a report prior to being contacted as part of the evaluation.

Process for producing and approving plans/reports

- 4.18 The process for producing and approving plans and reports has varied across public authorities. Across many public authorities who were interviewed, a single officer has taken responsibility for the process whereas in other cases the process has been more embedded and has involved a much wider contribution from across the organisation. In contrast to this somewhat mixed picture about the extent to which the implementation of the duty has been embedded across the authority gathered via the interviews, surveyed public authorities thought that biodiversity considerations were either very or fairly embedded at a senior level across their organisation. Figure 4.4. shows that a fifth of surveyed public authorities (11 respondents) thought that biodiversity

considerations were very well embedded and a further three-quarters (37 respondents) thought that biodiversity considerations were fairly well embedded at a senior level. Very few (four respondents) did not think this to be the case.

Figure 4.4: Extent to which biodiversity considerations are embedded at a senior level across public authorities



Source: OB3 Survey (52 respondents)

- 4.19 It has been common for a single officer with responsibility for biodiversity or green infrastructure issues to have drafted the section 6 plan and report. This was evident from the feedback gleaned from members of the SDCC+ group, as only two of those present in the workshop had played an active role in developing the plan or report within their organisation. Most of these officers had heard of the duty but not all were informed as to whether their authority had complied or not. In many cases across Group 3 public authorities, the drafting of a plan or report would have been informed by the officer's liaison with other departments as well as, but to a lesser extent, facilitated workshops across the organisation.
- 4.20 In a small number of public authorities the drafting process has been less embedded, with a plan and/or report being submitted to an executive level committee for approval without any wider consultation or engagement across the authority. Many public authorities, particularly those from local authorities, mentioned that they had appointed an elected member to champion the duty and its delivery plan. Some local authorities found it difficult to decide which Council member should take this responsibility, given that the duty encompasses different councillor

portfolios. Nonetheless, public authorities consider this approach to work well as ‘it means we have someone on the governing body to push it through’.

The duty is becoming increasingly regarded as a whole organisation responsibility across **Blaenau Gwent County Borough Council**. The Natural Environment team, which has taken responsibility for the preparation of the plan and report, approached all departments to gather ideas and actions which could be included within the plan and for which individual departments could take responsibility for delivering. A Biodiversity Champion has also been appointed at Councillor level. The Corporate Governance Team has been informed of the need to consider the duty within their business planning processes and their section 6 duty plan and report is considered by elected members at the Council’s scrutiny committee.

In another public authority, a lead officer prepared the plan and discussed its content with the management team and other teams across the organisation. Amendments were made to it based on feedback received. The plan was then shared with all staff for further comments which resulted in some changes to the actions set out.

- 4.21 Time wise, the process of producing and approving plans and reports has varied from between two months up to some two years. Less embedded approaches have tended to be completed within a shorter timeframe. In several cases, the process stalled following initial development and drafting work, as plans and reports were not put forward for formal improvement or public authorities were unsure how they would be able to monitor progress made.
- 4.22 Several interviewed public authorities thought it had been valuable to have had a dedicated funded officer with knowledge and expertise in ecology and biodiversity in place to drive forward the planning and

reporting work. These postholders were often funded via external grant funds (including via the Nature Fund grant). In one case a public authority contracted out the work of developing a biodiversity plan and report to an experienced consultant whilst another (a higher education setting) appointed a student to support the work.

- 4.23 Several public authorities reported that they had either specifically established or used an existing steering or advisory group to help oversee the drafting and implementation of the plan. These included internal working groups such as Sustainability or Environmental Action or Implementation Groups, Biodiversity Groups, Climate Emergency Working Groups and Futures Working Groups.
- 4.24 It was also common for interviewed representatives to observe that their plans and reports had been approved through their usual formal approval channels, including gaining approval at the departmental level, senior management/executive leadership approval as well as elected member or non-executive board level.

Content and quality of plans and reports

- 4.25 In terms of good practice in relation to the content and format of plans and reports, it is worth observing that:
- some plans/reports are much easier to read than others. These tend to be published plans/reports which are well laid out, highly visual and clearly reference which NRAP objectives their actions relate to. For instance:

Public Health Wales 'Making Space for Nature' is an excellent example of an easy to read, relatively brief document which clearly articulates what the authority plans to achieve and what it has achieved against each of the NRAP objectives. Both the plan and report are highly visual documents which contain illustrative case studies which reference projects such as the 'veg on the ledge' scheme. The report contains an embedded link to the plan, and vice versa, making it easy to access either document.

- one public authority has produced a signposting document which helpfully sets out how the organisation is meeting its duty requirements:

Pembrokeshire Coast National Park Authority has published a brief signposting document outlining the approach taken to embed the duty within its corporate planning framework and reporting. This signposting document is referenced within its annual report on the wellbeing objectives and provides an overview of the actions being taken to comply with NRAP objectives. It is intended to satisfy the reporting and monitoring requirements of the duty, given that existing corporate plans and reports demonstrate how the authority maintains and enhances biodiversity, as part of its core function.

- some plans/reports are well considered and there is clear evidence that time has been spent on their development, that organisations have taken the duty seriously and attempted to embed responsibility across all operations:

Mid and West Wales as well as **South Wales Fire and Rescue Services** have both developed detailed and well considered biodiversity action plans which consistently reference the need to embed biodiversity across all areas of the organisation. These include actions at designated sites, estates management, new buildings, and major refurbishment work. The plans also set out the need to develop strong links with other organisations including local authorities, local nature partnerships, public service boards and Natural Resources Wales.

- several plans and reports helpfully set out specific and measurable actions, in some cases with named officers allocated responsible for each. Some of these plans/reports also set out achievements, benefits as well as outstanding actions. For instance:

Conwy County Borough Council has published a combined stand-alone plan and report. All actions are identified under their respective NRAP objective and each one is allocated to a specific department and named lead officer. As part of its reporting, a status position is set out for each action as well as an update on progress.

Monmouthshire County Council's report sets out the highlights, outcomes, and benefits for each of its key objectives. The report also identifies which of the NRAP objectives each of its organisation's objective contribute towards. Issues experienced in achieving each objective are set out. The report also contains a series of project level case studies.

- some plans/reports are clearly embedded into wider agendas, such as the wellbeing agenda and the wider environmental agenda.

4.26 The main common issues with the plans and reports reviewed by the evaluation team, were that:

- some reports are more akin to plans than reports, despite being identified as a report
- some plans/reports were particularly brief and resembled more of a policy statement than an action plan
- some plans/reports were overly focused on environmental actions such as those relating to reducing energy use, reducing carbon emissions, reducing waste, increasing recycling and increasing green procurement practices as opposed to actions relating to enhancing and protecting biodiversity
- many Group 1 public authorities, which are primarily office based organisations, understandably tended to set out very limited

biodiversity actions and placed greater emphasis upon environmental actions such as those outlined above

- some plans/reports are not particularly well structured and were challenging to read (due to their level of technical content, length, and lack of use of tables, figures or visual content to summarise the narrative). Some plans could also benefit from adopting a more explicit approach to demonstrate which NRAP objectives their actions are aligned with.

5. Duty guidance

Key findings

- Section 6 plans and reports have generally aligned well with the requirements of the guidance and the NRAP objectives.
- Awareness of the guidance amongst those who had prepared a plan or report was generally high and most public authorities had used the guidance to prepare their plans and reports and had found it useful in terms of providing them with a framework and structure.
- Those who had yet to prepare a plan or report had not been as aware of the guidance until being contacted for this research.
- Public authorities would generally welcome more case studies and best practice examples within the guidance.
- It was felt that the Welsh Government could communicate more regularly with public authorities, particularly to raise awareness at a more senior level about the importance of complying with the duty to improve and maintain biodiversity.
- Many public authorities would welcome greater feedback from the Welsh Government on the content of their section 6 reports.

5.1 This chapter addresses two of the research objectives and looks to establish the extent to which plans and reports align with the requirements of the duty, in particular whether they follow the guidance and make use the objectives of the Nature Recovery Action Plan (NRAP) for Wales. It also draws out key findings in terms of any further guidance, support, training, or other action public authorities would find useful to enable this.

Alignment with guidance and NRAP objectives

5.2 Table 5.1 sets out whether plans and reports produced by public authorities adhere to the duty guidance. Overall, some three-quarters of the plans and reports reviewed were judged to adhere to the guidance

whilst a small number were considered to adhere in part. Relatively few plans or reports were not considered to adhere at all to the guidance, and these tended to be more generic policy statements and those which did not make any reference to NRAP objectives.

Table 5.1: Analysis of whether public authorities' plans and reports adhere to duty guidance

	Number of plans	Number of reports
Yes	34	31
In part	7	5
No	4	3
Total	45	39

- 5.3 The analysis also considered which six NRAP objectives the plans and reports were aligned to. Of the 45 plans analysed, there was good alignment to NRAP objectives across the board, with fewer being aligned to objectives 3 (increase the resilience of our natural environment by restoring degraded habitats and habitat creation) and 5 (improve our evidence, understanding and monitoring).

Table 5.2: NRAP objectives aligned to in plans (n=45)

Objective	1	2	3	4	5	6
Yes	41	34	33	39	34	41
No	4	9	12	6	11	4

- 5.4 The analysis also considered the extent to which these NRAP objectives had been adopted by public authorities to inform their plan. Table 5.3 demonstrates that two-thirds of the plans were considered by the research team to have been well informed by the NRAP objectives.

Table 5.3: Assessment of NRAP objectives in plans

RAG ⁹ Status	Number	Percentage
Red	3	6%

⁹ Red, Amber, Green

Amber	12	26%
Green	30	68%
Total	45	100%

5.5 Those categorised in 'green' typically had detailed and comprehensive plans with specific actions in place. Those categorised as 'amber' or 'red' had much less detail and were often largely a tick box exercise rather than outlining any real actions. These plans also tended to outline activities such as reducing waste, energy use or emissions rather than biodiversity specific actions in line with the NRAP objectives or did not fully respond to the requirements set out in the guidance.

5.6 In considering the NRAP objectives aligned to within published reports, a similar picture emerges to that of the plans.

Table 5.4: NRAP objectives aligned to in reports (n=39)

Objective	1	2	3	4	5	6
Yes	31	23	22	31	22	30
No	8	16	17	8	17	9

5.7 Again, our assessment of the extent to which the NRAP objectives were reported against shows that the vast majority of reports showed a high level of relevance and quality content:

Table 5.5: Assessment of NRAP objectives in reports (n=39)

RAG Status	Number	Percentage
Red	2	5%
Amber	10	26%
Green	27	69%
Total	39	100%

- 5.8 'Green' categorised reports were detailed and well laid-out with clear read-across to the NRAP objectives. Those categorised as 'amber' or 'red' tended to highlight wider environmental activities rather than biodiversity related ones or contain less detail on achievements.

Views on usefulness of the guidance and NRAP objectives

- 5.9 The majority of interviewed public authorities considered the guidance to be useful and helpful, particularly when developing reports. Three interviewed public authorities simply could not recall the guidance as they had prepared their reports back in 2019.

- 5.10 The guidance was deemed to be useful because it:

- helped public authorities to be more focussed and logical in the preparation of their reports by providing a solid structure or framework to work towards:

 'the report came together quickly so the guidance must have been good'
- enabled them to take a more holistic view of what they were doing
- broadened their view on what could be achieved
- helped to identify gaps.

- 5.11 In terms of the NRAP objectives specifically, public authorities found that they helped provide a structure to the plan. For those with little or no knowledge of biodiversity, the NRAP objectives had pointed them in the right direction and provided a useful steer. Public authorities liked how the NRAP objectives could be utilised to ensure compliance.

- 5.12 Only four interviewed public authorities had not made much use of the NRAP objectives in preparing their plans or reports. In one instance their biodiversity plan was already in a quite advanced stage when the guidance was published so the NRAP objectives were only used to check that they met all requirements, and no re-drafting was undertaken. Another recalled that the NRAP objectives were not easy to get hold of at the time of drafting their plan and a further two could not remember

whether they had made use of the NRAP objectives in the drafting of their reports or not.

- 5.13 Only one of those interviewed who had a plan in place was not aware of the guidance and said that they had put their plan together using their own knowledge and background in biodiversity.
- 5.14 Two interviewed respondents, both from Group 1 public authorities, had not found the guidance very useful. They had found it too broad and not focused enough on what small organisations with no biodiversity remit could achieve.
- 5.15 Of those who did not currently have even a draft plan or report in place, most were not previously aware of the guidance until informed of it as part of this evaluation. The main reason for not having viewed the guidance initially was that these public authorities had assumed that they were not covered by the duty.

How current guidance could be improved

- 5.16 Despite the guidance already including a reporting template, one of the main requests from interviewed public authorities was for such a template, suggesting a lack of awareness of what is already available. It was recognised that adopting a consistent template would make it easier for the Welsh Government to assess the impact of the duty, as more comparable reports would make it easier to measure progress and build up a national picture of what is happening.
- 5.17 Another request from several public authorities was for the guidance to include more on what best practice looks like. This could be in the form of case studies or good practice examples. Public authorities felt that this would help them see how others in a similar position to themselves were changing the way they worked or were contributing to the duty. Two public authorities noted that case studies that included an element of cost-benefit analysis demonstrating how responding to biodiversity priorities could be done in a cost-neutral way could be useful as they could help influence decisions internally to proceed with new ways of working.

- 5.18 Group 1 public authorities in particular were keen to know how they could access other similar organisations' plans and reports in order to gain ideas for action they could take.
- 5.19 Other suggestions offered for improving the current guidance included:
- more information or set criteria on what should or has to be done:
 'this would give the organisations more leverage to get it done'
 - more clarity on which public authorities fall under the duty
 - more reflection on outward impacts rather than just a focus on the internal operations of the organisation
 - suggestions on how to work in partnership or to find partnerships within Wales who can support the biodiversity enhancements that public authorities lay out in their plans
 - setting out the alignment between the duty and area statements (for Group 3 public authorities in particular)
 - an update to the priority list in Section 7 of the Act
 - include a requirement for public authorities that fall under the WFG Act to explicitly link their section 6 plans/report with that Act:
 'there is a natural synergy between biodiversity and wellbeing in nature and there is an opportunity here to tie them together and to get public authorities to achieve more than one objective by protecting biodiversity'.
- 5.20 Of the public authorities who had yet to prepare a plan/report, most had gained an opportunity to look at the guidance and felt that it was clear and good. One interviewed public authority who had not yet prepared a report felt that the guidance was too long-winded and would welcome a more concise step-by-step approach whilst another commented that 'there is a lot of guidance out there and we've just ignored it if I'm honest'.

What additional support would be welcomed

- 5.21 Interviewed public authorities offered several suggestions in terms of additional support that they would like to receive to better comply with the duty.
- 5.22 Firstly, it was suggested that communication from the Welsh Government could be improved. A few public authorities mentioned that they could only recall receiving one or two letters in relation to the duty. As most public authorities had published their reports in 2019 (or just after) and were working on the three-year reporting cycle outlined in the guidance, it was suggested that a webinar, presentation, or short video could be distributed prior to the next reporting period to raise awareness: ‘the three year cycle is quite a long time and interest is waning so it will need a big push again’.
- 5.23 It was also observed that greater awareness of the duty at a more senior and strategic level across public authorities, particularly amongst chief executives and senior management teams, was required to raise its profile. It was suggested that a Minister-led event targeted at chief operating officers to outline the importance of biodiversity would help, and that it was important that senior civil servants, in addition to more junior officers, engaged with public authorities on the issue.
- 5.24 Many public authorities observed that they had not received any feedback, and in some cases no acknowledgement, from the Welsh Government on their published reports. This would be welcomed in the future, not least to provide reassurances that published reports are of acceptable quality but also to allow authorities to identify any areas of improvement: ‘we would welcome constructive feedback from Welsh Government or anyone – we’ve never received anything’.
- 5.25 One interviewee suggested that lessons could be learnt from the way Welsh Government has implemented the Play Duty on local authorities. Initially, local authorities had been submitting annual plans in relation to this duty but were not receiving feedback. When the issue was raised, a dedicated Welsh Government officer was appointed to work with the

sector and respond to plans submitted which led to an improvement in the quality of plans and actions being undertaken. It was suggested that a similar approach could work well in relation to the section 6 duty.

5.26 The issue of feedback was closely linked to a call for more scrutiny and accountability in relation to the duty. Several contributors wished to see a stronger requirement to send in reports and receive acknowledgement from Welsh Government that they had been produced. A small number suggested a penalty was needed for not complying, but most authorities felt that detailed feedback sent to a senior officer would be sufficient in helping to raise the profile and ensure the duty became more embedded in senior decision-making processes.

5.27 Other suggestions offered by contributors included:

- setting up a facilitated network of public authorities to learn from each other (this was a request from Group 3 respondents in particular)
- access to expert advice and support (a request from several Group 1 respondents)
- the provision of training around what can be done or practical examples. This could include specific training or awareness raising with community councils (for Group 3 in particular) so that they could work with their local authorities to implement enhancements to biodiversity
- appointing an Environment Commissioner (working in the way that the Future Generations or Welsh Language Commissioners can hold organisations to account) who would have responsibility for biodiversity matters:

‘this would make a huge difference in status and action’
- giving due consideration as to whether the duty could be used as a lever within the Welsh Government’s circular economy funding approach. One public authority had seen this funding being used

to eliminate single use plastic and felt it could be used to support biodiversity in a locality as well.

6. Barriers and enablers

Key findings

- The key barriers and enablers to implementing the section 6 duty relate to three themes: a) resources, b) knowledge and information, and c) priorities and influences.
- Lack of resources was identified as the main barrier, particularly by local authorities, due to austerity cuts, depleting 'green' teams and changes to the way biodiversity work is funded.
- Public authorities who do not have dedicated natural resources staff lack knowledge and information about biodiversity.
- The duty has often been championed by dedicated individuals who have the appropriate ecology/environmental expertise and strong communication skills.
- A key enabler for Group 3 public authorities has been the appointment of elected members as champions for biodiversity across the organisation.
- Smaller authorities without land have found it difficult to identify plans of action they can take.
- The duty has struggled to secure a high level of prominence as other priorities have overshadowed it, including the Wellbeing of Future Generations (Wales) Act and the climate change agenda.
- There are several reasons why public authorities have not prepared or published a plan/report including delays to formal approval processes (often because of COVID-19), lack of awareness of the need to report, and lack of time and resources to do so.
- The main reasons why community and town councils have not prepared or published a plan or report include being informed

very late of the need to do so as well as a lack of knowledge resources.

- 6.1 This chapter sets out the key barriers and enablers to implementing the duty. It also considers the main reasons why some public authorities have not prepared or published a section 6 report.

Key barriers

- 6.2 The barriers to complying with the duty can be broadly categorised into three areas:
- lack of resources
 - lack of knowledge and information, and
 - priorities and influences,

Lack of resources

- 6.3 This was the most frequently mentioned barrier by public authorities. Local authorities were particularly likely to highlight this as an issue, citing austerity cuts and a depletion across their 'green' teams having resulted in fewer staff available to deal with increased workloads and duties. Having said that most local authorities interviewed had complied with the duty.
- 6.4 Changes to the way biodiversity related work is funded across local authorities is having a major impact. The loss of the NRW Partnership Funding stream and subsequently the Single Revenue Grant has led to uncertainty for staff and reduced capacity to deliver. One public authority interviewed highlighted that this had directly resulted in the loss of one member of staff. Whilst the new Enabling Natural Resources and Wellbeing (ENRaW) scheme funding was welcomed, the competitive nature of the grant, and the significant delays some have experienced in gaining funding approval, mean that there is less consistency to the work that can be delivered, including complying with the duty. It was also acknowledged that whilst most Welsh Government funding focused on capital projects, there was often a greater need for revenue funding to

ensure that existing sites could be managed and maintained in a way which would allow public authorities to deliver upon their section 6 plans.

- 6.5 For other public authorities, the lack of resources restricted them from buying in specialists to help them implement the duty and address their internal lack of knowledge. Some Group 1 public authorities also held the perception that complying with the duty would require financial investment on their part.

Lack of knowledge and information

- 6.6 A lack of knowledge was a particular issue for non-local authority organisations. Local authorities tend to have a dedicated natural resources team or at a minimum a dedicated ecologist with the necessary knowledge to write and implement a plan. However, for other organisations without this dedicated resource, a lack of knowledge of biodiversity issues was a barrier, at least initially and many had to rely upon a member of staff with a personal interest in this area to help develop and implement a plan.
- 6.7 As well as a lack of biodiversity knowledge, a lack of knowledge about what their plan should or could contain was also raised. For organisations with land, be it an extensive estate or even just land surrounding a building, this provided a focus for development of a plan. However, smaller organisations with limited staff numbers and often small, rented offices had to be more creative with their plans and the lack of information about what their plans could contain or what they should look like was a barrier. The lack of good practice examples, collaboration amongst public bodies and a lack of communication from Welsh Government were all raised by organisations interviewed.
- 6.8 Poor communication from Welsh Government was a consistent theme from many public authorities, particularly non local authorities. Issues included a lack of dialogue outside of formal reminders to comply, lack of contact details for a named individual within the Welsh Government to ask questions, a need for initial training and greater feedback on plans and reports submitted to let organisations know if their efforts have

resulted in 'compliance'. One organisation interviewed said that they felt like they were 'in it alone' and observed that more information, feedback, and networking opportunities would have enabled them to comply earlier.

- 6.9 The issue of public perception was also raised as a barrier, mainly by local authorities. Where actions include, for example, leaving verges uncut to encourage wildlife they will often get complaints from members of the public saying that the verges are untidy. Reference was made by a couple of local authorities to a project run by Monmouthshire County Council entitled 'Nature Isn't Neat' as a good example of efforts to inform and change people's perceptions of nature.

Priorities and influences

- 6.10 The need to comply with competing priorities and other legal duties was cited as a major barrier to complying with the duty. Local authorities highlighted the difficulty of getting other departments to engage with the duty as they have their own priorities and legislative requirements. Biodiversity is often considered to be someone else's problem. Economic development pressures were cited as often overriding other considerations. A lack of a 'top down' approach in many public authorities was raised, with the duty delegated to the 'green' team to deal with rather than seeing it as a corporate, cross cutting issue.
- 6.11 Many contributors felt that the duty was overshadowed by the Wellbeing of Future Generations (WFG) (Wales) Act 2015 which most public authorities have embraced. Whilst there are obvious synergies between this Act and the Environment (Wales) Act 2016, these are not always being recognised by public authorities. Actions to achieve a resilient Wales do not always include actions to ensure resilient ecosystems. Creating better links between the two, with better information about how the two correlate would be helpful as complying with the WFG Act is often seen as a corporate function delivered as part of the Chief Executive's office. Having the duty more closely linked with Public Service Boards (PSBs) would also help to share experiences and resources.

- 6.12 Similarly, local authorities mentioned that climate change and carbon zero plans did not necessarily include mention of the role the natural environment has to play in achieving targets. These are also often delivered as a corporate function and closer links with the duty would help to mainstream its implementation.
- 6.13 One reason identified for the duty and biodiversity issues not gaining greater importance in competing priorities was the lack of consequences of not complying. Many asked ‘what happens if you don’t comply?’. Some pointed to the successes of other areas of Welsh Government intervention such as achievement of recycling targets by local authorities where significant financial penalties were imposed for authorities that failed to do so. Whilst no one asked for similar consequences to be imposed for the duty, a lack of any penalty for not complying was recognised as a barrier to ensuring compliance.
- 6.14 The need to ensure compliance with the duty across various Welsh Government funding streams was also highlighted as a way to impose some element of consequence, particularly within local authorities. For example, it was suggested that housing grants should require all projects to be compliant with the duty and local authority plans.

Key enablers

- 6.15 As to be expected, the enablers to complying with the duty were often the same as those identified as barriers. For example, a lack of resources is a barrier, but with sufficient resources compliance is easier.

Resources

- 6.16 The key enabler for complying and embedding the duty across the work of a public authority was identified as having the right people in place. Whilst this obviously referred to people with the right knowledge, of equal importance was having people with the correct skills and at level of seniority to communicate and bring others along with them. This was evident for both local authorities and other public authorities.
- 6.17 For local authorities having someone dedicated to complying with the duty was considered important. Teams are often spread thin and

additional duties can fall through the cracks with pressure to keep up with day-to-day work. Having an officer with good communication skills who has the time to engage with other departments and provide advice and assistance was key, with one interviewee describing using a 'carrot and stick' approach, telling people about the duty and how they could help them to comply. Similarly, they found it easier to engage with other departments when there was an individual there who had a personal interest or with whom they already had an established good working relationship.

Knowledge and information

- 6.18 Some smaller public authorities found it useful to search for examples of what other similar organisations had done to comply with the duty. The Wales Biodiversity Partnership website was cited as a good source of information, but it was noted that not all plans and reports produced seem to be held here. As already discussed, it was felt by many public authorities that more could be done by Welsh Government to share good practice.
- 6.19 Raising awareness of the duty and the issues involved across an organisation was also considered to be important. Education and working closely with schools was also seen as a way of ensuring future generations would be more environmentally aware.

Priorities and influences

- 6.20 There were several ways that local authorities identified that could ensure that the duty was given increased priority across the work of the council. These included:
- having a named councillor responsible for biodiversity issues and ensuring they are considered in decision making. However, it should be noted others stated that this does sometime allow others to absolve themselves from responsibility leaving it to this one councillor

- identifying biodiversity champions in each department of the council
- public pressure. Whilst this was also raised as a barrier, as environmental issues are increasingly discussed in the media, and with the public's increased awareness of their local environment during the COVID-19 pandemic, the public have a strong role to play in ensuring biodiversity and other environmental issues are at the forefront of local authority delivery
- clear advice from Welsh Government on the importance of the duty. Two local authorities positively commented upon a letter written by the Chief Planner sent to all authorities setting out the need to consider the duty in forward planning and planning decisions. They felt that this had helped to strengthen the role of ecological advice in the planning process, and consideration should be given to issuing similar letters for other areas of delivery influenced by Welsh Government
- ensuring biodiversity issues and the duty are considered as corporate cross cutting responsibilities and adopting a top-down approach, although it should be noted that none of the authorities interviewed specifically said they had achieved this.

Reasons for authorities not preparing/publishing a plan/report

6.21 Thirteen public authorities who either replied to the survey or were interviewed had not prepared or published plans and reports to date. Several reasons were provided:

- in four instances (all Group 3 organisations) a draft report had been produced in line with statutory requirements in 2019 but there had been delays in their internal formal approval processes, often due to delays associated with the COVID-19 pandemic
- in another four instances, public authorities had not been aware that they were required to prepare a report, until they were

contacted for this evaluation, or in one instance had received a letter from Welsh Government but did not think it applied to them

- a further four public authorities cited lack of time and resources to prepare the plan/report. These were mainly Group 3 public authorities with sustainability or biodiversity departments that were currently under-staffed or did not have an officer in post
- one public authority stated that the preparation of a report had not been a priority for a small organisation such as themselves that had no estate and only occupied a floor in an office block. They also stated that the requests from Welsh Government had not been sent to the correct part of the organisation, so it had taken time for the request to reach the right individual. In this case, the authority had tried to engage with Welsh Government to clarify if they needed to report against the duty but had not received a response thus far.

6.22 Only a small proportion of community and town councils are compliant with the duty and several reasons account for this:

Very few of the 735 **community and town councils** across Wales have been able to comply with the section 6 duty to date, primarily because they were late being informed by the Welsh Government that the duty applied to them. The sector only received formal instruction and guidance towards the end of 2019/early 2020, that they were required to produce plans. Since this guidance was issued by the Welsh Government, One Voice Wales has been supporting the sector to comply by disseminating information to members.

Nine community and town councils are listed on the Biodiversity Partnership website as having published a report, although many of the links provided to their reports do not work. Feedback sought as part of this review suggests that approximately 60 councils have shared reports with the Welsh Government.

One of the key issues facing community and town councils is the lack of knowledge and resources to develop plans and reports which satisfy the legislative requirements. Furthermore, One Voice Wales lacks specialist expertise and resources to provide the necessary advice and support to councils on the development of their plans and reports. The sector would benefit from additional resources to help provide tailored support and guidance to community and town councils. This would also allow for greater promotion of the duty amongst councils, the provision of tailored information webinars and responding to individual council requests for advice.

7. Difference made

Key findings

- The main impact of the duty has been to increase awareness and understanding of biodiversity across public authorities.
- It has contributed positively, but to a lesser degree, to biodiversity becoming more embedded across public authorities' decision making and service delivery.
- The difference made to reversing the decline in biodiversity varies by type of organisation – many local authorities were already active in this area prior to the duty being introduced but the duty has helped to secure greater prominence and importance to the agenda.
- Many public authorities report that they now mow grass less frequently than previously and better manage it for pollinators and other wildlife. Other changes introduced include wellbeing wildlife gardens, bird and bat boxes, and creation of log piles when trees are removed.
- Public authorities without land have found it more difficult to implement actions which make a positive contribution to biodiversity and their range of actions are more limited.

- 7.1 This chapter sets out the findings of the fieldwork in relation to the difference which the duty has made to public authorities' way of working and reversing the decline of biodiversity.

Difference made to public authorities

- 7.2 An analysis of the plans and reports available suggests that most public authorities demonstrated strong evidence across the five themes of action which flow from the NRAP objectives. These are set out at Table 7.1 and shows that some three-quarters of plans/reports reviewed are geared to safeguard specific and habitats and improve the resilience of habitats.

Table 7.1: Section 6 plans and reports delivering against the five NRAP themes of action

	Evidence of mainstreaming action	Used evidence	Supported action by others	Safeguarded species and habitats	Improved resilience of habitats
Yes	38	38	43	45	42
No	10	12	9	11	11
Difficult to say	10	8	6	2	5

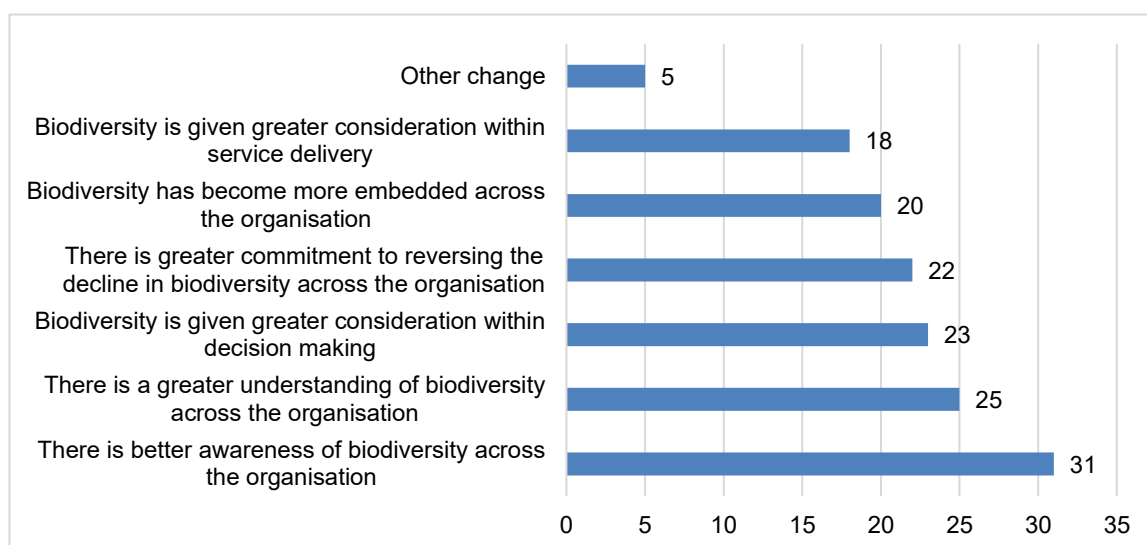
7.3 Our assessment of the available evidence within published plans and reports suggests that around half of public authorities were able to demonstrate that complying with the duty was having a significant positive impact upon their organisation, as coded 'green' at Table 7.2. The majority of the remaining plans/reports considered were coded 'amber' and these would include authorities who were already actively involved in biodiversity issues i.e., the introduction of the duty had some impact upon their work. A small number were coded as 'red' and these were authorities where the duty was considered to have had no impact at all upon their work.

Table 7.2: Assessment of the duty's impact on public authorities

RAG Status	Number	Percentage
Red	4	7%
Amber	22	38%
Green	31	53%
Total	58	100%

7.4 The findings from the web survey echo this analysis. Figure 7.1 sets out the changes observed by surveyed public authorities as a result of complying with the duty. It suggests that the introduction of the duty has helped to increase awareness and understanding of biodiversity issues across organisations but has had less of an impact upon embedding biodiversity considerations across organisations and service delivery.

Figure 7.1: Changes experienced across public authorities from complying with the duty



Source: OB3 Survey (52 respondents)

Consideration within service delivery

7.5 The fact that the duty is a formal legal requirement which public authorities are required to comply with is the main way in which it has made a difference to the focus given to biodiversity, according to those interviewed. The duty has made it easier to get corporate buy-in. Several interviewed authorities mentioned that the duty had given them the ‘hook’ to talk to other staff members or departments about biodiversity issues:

‘we use it to engage with colleagues to explain to them why they need to be more proactive in how they manage or develop land’

‘Section 6 has given our comments more weight – they are no longer just seen as observations, but important issues for consideration. It has helped to get people to think about biodiversity from the beginning and consider environmental issues more holistically’

‘it’s been an additional drive and we’ve been able to make a case for additional funding to help deliver the objectives’.

7.6 Several local authorities had noticed that planning departments, in particular, were now giving biodiversity more attention and that consideration of biodiversity conservation and enhancement was

happening earlier in the planning process with a better opportunity to influence the final decisions as a result. Another public authority was changing its grounds maintenance contract specification to include biodiversity enhancements across all their sites.

- 7.7 Smaller public authorities, often based in a single small office felt that they were less able to make major service delivery changes to their day-to-day work.

More embedded across the organisation

- 7.8 Examples were given within local authorities where the duty had successfully been utilised to drive changes in working practices within planning, transport, or estates departments – particularly in terms of embedding biodiversity considerations more routinely and earlier in new developments. However, there was little evidence of biodiversity being fully embedded across all functions of the organisation.
- 7.9 In other instances, particularly national parks, the maintenance and improvement of biodiversity and ecosystems was seen as core to their main purposes and therefore the requirements of the duty were embedded across the organisation with clear expectations of staff and key partners to help them achieve this.
- 7.10 In non-local authority organisations, the development of a duty forward plan had resulted in things being done in a more systematic way.
- 7.11 In at least four of the public authorities interviewed, a new biodiversity or sustainability officer was now in post, and in two of these cases, the existence of the duty had contributed to the decision to create these posts. These organisations saw an opportunity for these newly created roles to increase understanding of biodiversity issues across the organisation and further embed the requirements of the duty in activities.

Greater commitment to reversing decline in biodiversity

- 7.12 Overall, very little evidence was provided during the interviews that public authorities were demonstrating a greater commitment to reversing

the decline in biodiversity. Despite this, some examples were captured, including:

- one public authority mentioned how the duty had made them review the land that they managed and their level of ecological importance; had allowed them to communicate what they were already doing and made them consider what more could be done.
- another regulated public authority was making new challenging corporate commitments to ensure that where impacts to biodiversity and ecosystems could not be avoided by their work, they would deliver a 10% net gain in biodiversity and ecosystem services as well as enhancing the biodiversity and environmental value of the land that they owned and managed:

‘this increase in level of commitment is the most significant change implemented across our business’

- another public authority who responded to the survey was engaging with staff on a biodiversity and decarbonisation strategy and were looking to develop a detailed action plan alongside this
- one public authority mentioned how they wished to see closer working within localities or regions. They mentioned a growing appetite for more collaboration across PSBs and saw opportunities for PSBs to work with NRW in their area to consider community projects that could support the ethos of the duty e.g., planting trees in key community sites.

Greater consideration within decision-making

7.13 Some examples were provided of the duty being integrated into formal management or corporate frameworks. For example:

- three public authorities mentioned that the duty was now referenced and discussed within their corporate plan or strategy
- in one public authority, biodiversity had now been introduced as an essential consideration within their procurement policy

- in one local authority, the duty was now included in their policy integration tool and two others mentioned how it was now a part of their impact assessment processes
- one public authority who responded to the survey mentioned how biodiversity was now given more formal consideration when preparing forward programmes of work.

7.14 Some interviewed public authorities felt that there was increased prominence to biodiversity issues within their organisation, with senior managers driving improvement and biodiversity being given more formal consideration in decision making. However, this was not a common message - feedback from several other public authorities suggested that biodiversity considerations were not high on the agenda at the most senior level and that other issues, such as the environment, often took precedent because there were so many demands on organisations in this area:

‘there is a real danger that biodiversity is being lost within this prioritisation for reducing carbon emissions’.

7.15 However, a few interviewed respondents felt that knowledge of sustainability in general was growing at a strategic level within their organisation, and biodiversity was one element of that.

Cardiff Council has a series of policies in their adopted Local Development Plan (LDP) relating to designated sites, ecological networks, priority habitats and species, and trees/hedgerows. In addition, one of the LDP’s key policies requires them to take an integrated approach to the management of green infrastructure during development.

These policies are implemented in full when significant likely impacts on green infrastructure are identified.

Cardiff Council have prepared and published a Biodiversity and Resilience Ecosystems Duty Forward Plan, approved comprehensive ‘Green Infrastructure’ Supplementary Planning Guidance, employed

a Local Nature Partnership Officer and started the process for a Local Nature Recovery Action Plan for the City.

Consideration of green infrastructure and biodiversity is also an integral part of the city's One Planet Cardiff Strategy.

Greater understanding and awareness across the organisation

- 7.16 A few surveyed public authorities mentioned that there was a higher awareness and understanding at both senior and operational level regarding the requirements of the duty but many larger Group 3 organisations felt that this remained 'patchy'.
- 7.17 Interviewed public authorities noted how the duty had increased awareness of biodiversity across their organisation simply because a report had to be prepared and approved. For example, one local authority's biodiversity officer was seeing more departments getting in contact and asking them for advice. Two other surveyed public authorities noted how biodiversity was now a more regular topic of conversation amongst staff:
- 'staff are discussing biodiversity more, they are more open to ideas and change, and we are ready for the next phase of our work'.
- 7.18 One public authority also mentioned that they had developed a biodiversity duty e-learning module for all staff.
- 7.19 In general, there was very little evidence provided of how biodiversity considerations was being communicated within organisations or with the wider community. Some public authorities such as universities were attempting to raise awareness among staff and students, but it remained the case that it was only mainly those with a previous interest in biodiversity who were likely to be aware of the duty rather than staff across the whole organisation. One local authority had started to see some members of the public asking questions about how the council was implementing the duty and this was increasing awareness amongst elected members.

- 7.20 Three of the smaller Group 1 authorities interviewed felt that the duty's impact upon their organisation had been more limited simply because they did not feel that they were able to achieve much to make a big difference when they worked in a small, rented office with no land.

At **Wrexham Glyndŵr University**, reporting on progress against the duty is now part of all workstreams and is something that is required across the organisation. As a result of the requirement to comply with the duty, there has been an increase in communication with students and the wider community about biodiversity and the environment.

Some specific projects have also been undertaken as a result including the development of a biodiversity trail through Wrexham town centre. This has involved putting in place a series of planters filled with plants to attract pollinators which leads people to the University's Science Garden. In the future, the Student's Union intends to do more planting around the campus. The University is also changing its grounds maintenance contract to have greater regard to biodiversity and change mowing regimes.

Difference made to reversing the decline in biodiversity

- 7.21 The difference made to reversing decline in biodiversity varies by type of organisation.

Local authorities

- 7.22 Most of the local authorities who contributed to the review noted that they were already delivering biodiversity outcomes prior to the duty being introduced. Despite this, they all felt that the legal requirement to comply with the duty had helped to give their work greater prominence and importance within their organisation. Whilst there is still work to do in ensuring consideration of biodiversity in all decision-making authority wide, a number of key actions were highlighted as having made a difference. Of particular note are:

- a number felt the duty (alongside mentions in Planning Policy Wales and the WFG Act), and the letter sent by the Chief Planner to all local authorities setting out how the duty should be considered in planning situations, had ensured that the advice they give on planning applications now had a greater importance
- a number of authorities have now included the duty and biodiversity within their policy development tools to ensure that all new policies and projects consider the issue at the outset
- one authority reported that as a result of the duty they now have a project ecologist embedded in the engineering design team ensuring that biodiversity considerations are included in projects from the start rather than as an add on at the end of the process in order to get planning permission
- one authority also noted that they felt the duty would help them to ensure that all the work they had done to improve the biodiversity within their area over the last 30 years would be managed and maintained for the future.

As a result of section 6, **Isle of Anglesey County Council** has managed to secure over 100 swift nesting boxes on new developments as part of planning conditions. Whilst they have yet to monitor how many of these boxes have been installed to date, this represents a considerable step forward in securing suitable habitat for the species.

Other public authorities

- 7.23 For other public authorities, the duty has given them the opportunity to consider how their ways of working impact upon biodiversity. The approaches taken can generally be split into two categories:
- those with a responsibility for land (Groups 2 and 3)
 - those without any responsibility for land (Group 1).

Other public authorities with responsibility for land

- 7.24 For those public authorities with responsibility for land the acreage involved varied from land surrounding an office, a multi-site estate or even a responsibility for farms and open access land.
- 7.25 For these organisations, actions tended to focus on land management with the most common behaviour change to mow grass less frequently and manage it for pollinators. This can also have a beneficial financial impact making it a quick win action and something that is easy to 'sell' to those in a decision-making role.
- 7.26 Other types of interventions highlighted included:
- development of wellbeing wildlife gardens
 - installation of bird and bat boxes
 - creation of log piles when trees needed to be removed
 - an increase in the use of recycled materials.
- 7.27 Organisations with large land holdings mentioned that the duty, and in particular the writing of the action plan, provided them with an opportunity to take stock of the land they were responsible for and realise their duty to ensure good stewardship going forward. New species were identified and even pockets of land that had been forgotten brought to the fore with new management regimes put in place for the future. As a direct result of the duty, these areas of land will be more appropriately managed for the benefit of biodiversity.

Other public authorities without responsibility for land

- 7.28 For those without any land, public authorities have adopted a more lateral approach to minimise the impact of their actions through procurement and travel policies. These organisations found it a challenge initially to identify actions they could take to make a difference. Most actions proposed focus upon office-based activities such as using recycled paper and those which will not necessarily have a direct impact on biodiversity in Wales.

- 7.29 One organisation interviewed noted that following COVID-19 and a change in working practices, they are looking to downsize their office space. As a direct result of the duty, they intend to find a new location which will be close to public transport, with limited parking for staff, all furniture will be recycled from their old office, and they intend to secure a green energy supplier.

South Wales Fire and Rescue Service has introduced wellbeing gardens to all their sites. These gardens, often designed in collaboration with local schools, generally include features such as bird boxes, bug hotels and wildflowers. Some locations are also considering introducing beehives as part of their efforts to protect and encourage wildlife. Awareness and understanding of biodiversity issues has increased and is having positive impacts on other day to day operations.

Mid and West Wales Fire and Rescue Service has embraced the duty. They now mow less frequently in order help pollinators and try to use recycled materials wherever possible. Their new building in Aberystwyth has been built with 95 per cent recycled materials. They have identified that their most damaging activity is using firefighting foam, especially in rural areas where it can damage wildlife, and are actively seeking a more environmentally friendly replacement. Their Sustainability Officer aims to identify eight actions to implement each year to help them constantly improve how they delivery their services and manage their estate.

Complying with the duty provided **Bangor University** with the opportunity to review and understand what it had in terms of land holdings. Writing the plan helped to highlight all of the protected species, habitats and sites they were responsible for and set out

how they were going to manage them going forward. It has helped them to move from a position of thinking this is nice to have to thinking this is important and we need to look after it to the best of our ability.

8. Conclusions and recommendations

- 8.1 This chapter presents our conclusions, drawing upon the desk review and fieldwork, and offers recommendations for the Welsh Government and public authorities to consider for the future.

Extent to which the duty has been implemented

- 8.2 The evaluation found that 56 per cent of public authorities (62 of the 110 who fell within the scope of the study) comply with the requirements of the duty, in that they have produced Section 6 plans or reports. This finding suggests that further work is required to improve compliance and implementation. Most plans and reports are standalone documents and very few public authorities have embraced the suggestion made within the guidance to embed reporting into corporate documents. This suggests that further work is required to truly embed the duty across public authorities.
- 8.3 Most of the plans and reports considered as part of this evaluation were comprehensive. Strong plans/reports were found to be those which are well considered, informed by clear evidence, easy to read, well laid out, highly visual, make clear reference to NRAP objectives and contain specific and measurable actions and achievements. Weaker plans/reports tend to be briefer and less well considered, more akin to a policy statement than an action plan, and overly focus on environmental rather than biodiversity actions.
- 8.4 The evaluation found that the duty has achieved some positive impacts in that it has helped to increase awareness and understanding of biodiversity across public authorities. It has contributed positively, but to a lesser degree, to biodiversity becoming more embedded across public authorities' decision making and service delivery. The difference made to reversing the decline in biodiversity varies by type of organisation as many local authorities were already active in this area prior to the duty being introduced. In these cases the duty has helped to secure greater prominence and importance to the agenda. Many public authorities report that they now mow grass less frequently than previously and

better manage it for pollinators and other wildlife. Other changes introduced include wellbeing wildlife gardens, bird and bat boxes, and creation of log piles when trees are removed.

- 8.5 There are several reasons why public authorities have not prepared or published a plan/report including delays to formal approval processes (often because of COVID-19), lack of awareness of the need to report, and lack of time and resources to do so. The main reasons why community and town councils have not prepared or published a plan or report include being informed very late of the need to do, lack of knowledge and lack of resources. Many of these issues could be addressed via the recommendations offered below.

Enablers and barriers to implementation

- 8.6 The key barriers and enablers to implementing the duty relate to the three themes of resources; knowledge and information; and other priorities and influences. Lack of resources was identified as the main barrier, particularly by local authorities, due to austerity cuts, depleting 'green' teams and changes to the way biodiversity work is funded. Many public authorities who do not have dedicated natural resources staff lack expertise and knowledge about biodiversity and smaller authorities without land have found it difficult to identify action they can take. The duty has not secured the same level of prominence as other priorities, such as the Wellbeing of Future Generations (Wales) Act and the climate change agenda, across public authorities and this needs to be addressed in the future.

Views on the guidance provided

- 8.7 Awareness of the guidance amongst those who had prepared a plan or report was generally high and most public authorities had used the guidance to prepare these and had found it useful in terms of providing them with a framework and structure. It was felt that the Welsh Government could communicate more regularly with public authorities, particularly in raising awareness at a more senior level about the importance of complying with the duty and to raise the profile of the

legislation. Many public authorities felt that section 6 reports should be subject to more accountability and would welcome constructive feedback and suggestions on their content.

- 8.8 Our recommendations broadly cover two themes: how to improve compliance across public authorities and recommendations about further guidance, support and training which is required to enable these to take place. We recommend that:

Recommendation 1: Greater clarity needs to be established about the public authorities who fall within scope of the duty. This review found examples whereby public authorities were unclear if they needed to comply with the duty and had assumed, prior to our contact with them, that they were not within scope. The lack of response from 38 public authorities to this review means that further work is required to establish if these remaining authorities are within scope of the duty, and if so, the Welsh Government should communicate this as a matter of urgency to individual organisations

Recommendation 2: Once a definitive list of the public authorities who are within scope of the duty is established, the Welsh Government should set out (within the guidance) how each public authority is expected to comply with the duty's reporting requirements. We would suggest that as a minimum public authorities should be required to submit their plans and reports to the Welsh Government and that a single repository of these documents be maintained. The Welsh Government may wish to consider how it could hold public authorities to greater account if they do not comply with the reporting requirements set out by the duty. This could involve setting out the steps and actions which it will take to address cases of non-compliance e.g. formal reminder to public authorities

Recommendation 3: The Welsh Government needs to improve the contact details it holds for public authorities for the purposes of communicating information about the duty to them. Many of the public authorities included on the database made available to the research

team either did not have any contact details or contact details were outdated. Ideally, this database should include details for chief operating officers as well as individuals who have been actively engaged with the duty e.g., a biodiversity/environmental officer or compliance/policy officer. Updated contact details for many of the public authorities were gathered as part of the review and should be used as a starting point for this work

Recommendation 4: The Welsh Government should continue to raise awareness about the duty across public authorities, ensuring that written communication is targeted at both senior level representatives within public authorities as well as operational staff who are actively involved with planning and reporting against the duty. This will be particularly important in the run up to public authorities being required to produce their second duty report, by the end of 2022. Communication to chief operating officers needs to be reinforced at Ministerial level to increase the status and prominence afforded to the duty

Recommendation 5: The Welsh Government could consider hosting an event or webinar late 2021/early 2022 to promote the duty and launch any new guidance to the sector. This event could be used to set out timescales for preparing a second duty report by the end of 2022, hear from public authorities from across all three groups who have effectively complied with the duty and to help facilitate networking between public authorities in order to share experiences and good practice

Recommendation 6: The Welsh Government needs to consider how it can better provide acknowledgement and feedback to public authorities who share their published reports. This work needs to be appropriately resourced so that it can help improve biodiversity planning and delivery across public authorities. Without this role being in place to monitor and review the work of public authorities, there is a danger that the duty will not be maintained as a priority by authorities

Recommendation 7: The Welsh Government may wish to consider how Group 1 public authorities, as well as town and community councils,

could be better supported in terms of access to expert advice and guidance given that this cohort tend not to have inhouse biodiversity expertise to help develop their biodiversity plans

Recommendation 8: There is scope to enhance the published guidance for the duty by including:

- examples of best practice such as case studies
- links to good quality plans and reports produced by other public authorities, setting out what is considered to be their strengths
- suggestions for how partnership working could help public authorities to achieve their biodiversity objectives
- advice on how the duty can better align with other priorities, including area statements, the Wellbeing of Future Generations (Wales) Act and the climate emergency agenda
- specific actions and examples that Group 1 public authorities, without land, can take in relation to enhancing biodiversity.

Annex A: Online Survey

Introduction

The Welsh Government has commissioned OB3 Research and BRO Partnership to evaluate the implementation of the Section 6 Biodiversity Duty.

Section 6 of the Environment (Wales) Act 2016 put in place a Biodiversity and Resilience of Ecosystems Duty for public authorities. To comply with the duty public authorities are required to embed the consideration of biodiversity and ecosystems into their day-to-day activities, policies, plans, programmes, and projects. The duty introduced a new planning and reporting requirement. This requires that every public authority which is not a Minister of the Crown or government department must prepare and publish a plan. Every public authority must also prepare and publish a report as to what they have done to comply with the duty.

As part of this evaluation, we wish to establish how many public authorities have published a plan or report.

Please note this evaluation is **not** about the performance of individual public authorities or apportioning any blame or taking punitive action, but to establish a baseline, examine how well the duty has been implemented so far and what can be done to improve it.

We would be grateful if you could please take a few minutes to complete this very brief questionnaire.

Name of organisation	
Name of responding officer	
Email of responding officer	

1. How familiar are you personally with the Section 6 biodiversity and resilience of ecosystems duty?	<ul style="list-style-type: none">• Very familiar• Fairly familiar• Not particularly familiar• Not at all familiar
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2. To what extent has your organisation embraced the Section 6 biodiversity duty?	<ul style="list-style-type: none"> • To a large extent • To some extent • To no particular extent • To no extent at all
3. How much progress would you say your organisation has made in respect of its duties under Section 6?	<ul style="list-style-type: none"> • Significant progress • Some progress • No particular progress • No progress at all
4. To what extent would you say that biodiversity considerations are embedded at a senior level within your organisation?	<ul style="list-style-type: none"> • To a large extent • To some extent • To no particular extent • To no extent at all

5. Has your organisation published a plan setting out how you will meet the requirements of the Section 6 duty?	<ul style="list-style-type: none"> • Yes, it has been prepared as a standalone document • Yes, it has been incorporated into an existing organisation report (e.g. an annual report) • No not yet, we are working on it • No, no work has been done on it
6. Has your organisation published a report setting out how you have complied with the Section 6 duty?	<ul style="list-style-type: none"> • Yes, it has been prepared as a standalone document • Yes, it has been incorporated into an existing organisation report (e.g. an annual report) • No not yet, we are working on it • No, no work has been done on it
[Routed] 7. Is the organisation's plan and report a combined document?	<ul style="list-style-type: none"> • Yes • No

8. Could you please attach a copy of your plan and/or report here? Alternatively, please provide a link to the published plan/report.	
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If a plan and/or report has been published:

9. Has complying with the Section 6 duty resulted in any of the following changes across the organisation?	<p>[select all that apply]</p> <ul style="list-style-type: none"> • There is better awareness of biodiversity across the organisation • There is a greater understanding of biodiversity across the organisation • There is greater commitment to reversing the decline in biodiversity across the organisation • Biodiversity is given greater consideration within decision making • Biodiversity is given greater consideration within service delivery • Biodiversity has become more embedded across the organisation • Any other changes (please specify)
10. What would you say has been the biggest change, if at all, for your organisation as a result of complying with the section 6 duty?	

If no plan or report has been published

11. Why has your organisation not published a plan or report?	
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<p>12. What guidance or support (e.g. access to a web based or telephone helpline, examples of good practice), if any, would your organisation find helpful to meet your legal duty?</p>	
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<p>13. Do you wish to make any other comments in relation to the Section 6 Duty?</p>	
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Annex B: Discussion guide for public authorities

A: Background

1. What is your current role?
2. In what way, if at all, have you been involved with Section 6 Duty of the Environment (Wales) Act 2016?
 - What do you understand of the Section 6 Duty and what it requires of your organisation?
 - How has your organisation responded and embraced the Section 6 Duty?
3. How much progress would you say your organisation has made in respect of its duties under Section 6?
 - What is the nature of any progress made?

B: Planning and reporting

4. Has your organisation published a plan setting out how you will meet the requirements of the duty?
 - If not, is work on a plan or report underway?
5. Has your organisation published a report setting out how you have complied with the duty?
6. If so, what format does the plan/report take?
 - Are they embedded into existing organisation reports? If so, which ones?
 - Are they combined?
 - When were they produced and published?
 - Can we access them?
7. What was the process for producing and approving the plan/report for the organisation?
 - Who led the process and who else was involved?
 - What was the process for approving the plan/report (e.g. committee/board approval)?
 - How long did the process take?
8. How useful, if at all, were the guidance and Nature Recovery Action Plan (NRAP) objectives to your organisation in developing your plan/report?
 - What was useful/less useful about them?

- How helpful were they for identifying and developing specific actions which the organisation has since taken (ask for examples)?
- How could they be improved?
- What new guidance documentation or formats would be useful?

C: Alignment of plans and reports

9. To what extent are biodiversity considerations embedded into the organisation?
 - Are biodiversity considerations embedded into senior level discussions and decisions?
 - Are biodiversity considerations embedded into corporate and/or other high level organisational plans?
 - In what way has the organisation utilised the NRAP objectives?
 - What, if any, barriers restrict the embedding of biodiversity considerations across the organisation?

D. If no plan or report has been published

10. Why has your organisation not published a plan or report?
 - What are the barriers to do so?
 - How could these barriers be overcome?
11. Are you aware of the current reporting guidance?
12. What other guidance or support, if any, would your organisation find helpful to meet your legal duty?

E. Barriers and enablers

13. What would you identify as the main enablers to implementing the duty?
 - What factors have driven its implementation?
 - Ask about internal drivers (e.g. expertise, a key champion, pressure from users)
 - Ask about external issues (e.g. decline in biodiversity, funding opportunities)
14. What would you identify as the main barriers to implementing the duty?
 - Ask about internal issues (e.g. resources, expertise, lack of funds, lack of understanding about what action they could take)
 - Ask about external issues (e.g. COVID-19, lack of guidance)

F. Difference made

15. What changes, if at all, has your organisation experienced as a result of complying with the section 6 duty?
- Ask about level of consideration given to biodiversity within decision making
 - Ask about extent to which a framework of governance and support for service delivery has been put in place
 - Ask about extent to which biodiversity has become more embedded across the organisation
 - Ask about extent to which biodiversity considerations are communicated within the organisation
 - Ask about levels of awareness amongst members, leaders, staff, users and voters
16. What new ways of working, if at all, have been introduced by your organisation as a result of complying with the duty?
17. What contribution, if any, has complying with the duty made to reversing the decline in biodiversity e.g. safeguarding species and habitats, improving resilience of habitats etc?
- Ask about impact upon safeguarding species and habitats of principal importance
 - Ask about increase in the resilience of our natural environment by restore degraded habitats and habitat creation
 - Ask about tackling key pressures on species and habitats
 - What evidence do you have of this?

G. Reflections

18. What further action can your organisation take to (further) improve compliance with the duty?
19. What further guidance, support or training would your organisation value in the future?