

MENTER AR GYFER
CADWRAETH NATUR CYMRU



INITIATIVE FOR NATURE
CONSERVATION CYMRU

Petitions Committee
National Assembly for Wales

15th June 2020

Dear Petitions Committee

INCC's Comments following the Minister's response (LG/00673/20) to the petition (P-05-941) - Biodiversity Remit for Natural Resources Wales (NRW)

Thank you for the opportunity to provide comment and further evidence in relation to the Minister's response (LG.00673/20) to the INCC Petition (P-05-941) - Biodiversity Remit for Natural Resources Wales.

INCC welcomes the progress made by Welsh Government in light of the petition, particularly the recognition of the nature emergency and the added emphasis on NRW as the major facilitator to halting and reversing the decline in nature in Wales (NRW Remit Letter 2020-21).

However, in her response (LG.00673/20) the Minister continues to celebrate the 'tools' (policies and documents) without consideration of whether NRW has the resources, structure and organisational ethos to apply those tools effectively enough to counter the escalating nature emergency.

The Minister fails to acknowledge the very real need for NRW to change if it is to deliver more for nature. This lack of acknowledgement regarding NRW's ability to deliver effectively creates a distorted representation of Welsh Government's true commitment toward halting and reversing the decline of nature in Wales.

It is clear that NRW needs to alter its approach toward delivering for nature conservation to fully meet the escalating nature emergency in Wales. A stronger, more explicit biodiversity remit would enable the organisation to change its mind-set to better prioritise nature conservation. Resources could be better applied and importantly, skilled and experienced staff would be at the heart of biodiversity decision making.

As highlighted in previous correspondence (16.02.2020), one of the current failings of NRW is their silence regarding the planning process in Wales. Planning represents both a means to protect habitats and species from harm as well as an opportunity to secure biodiversity gains in the long-term. Given the escalating nature emergency, NRW should be influencing the process far more than at present and working with Local Planning Authorities (LPAs) to ensure a collaborative approach to securing biodiversity gains. Instead, NRW have reduced their input to just a reductionist list of specific areas for comment and many local sites are being lost as a consequence. This contributes to the continual erosion of the landscape's overall resilience to support wildlife and the well-being of local communities.

If NRW was to have a stronger, more explicit biodiversity remit then the organisational management would be better placed to plan and deliver for the long-term (a necessity for nature conservation). Even the much welcomed project funding (highlighted in the Minister's response) appears to be relatively short-term in its delivery. Although these projects have a capacity to deliver for nature, they are often (on account of their funding) short-term, rushed and unsustainable in the long-term. If NRW are to fully play their role in meeting the escalating nature emergency, then projects need to have funding guaranteed over longer periods of time and delivered by an NRW which is well resourced with skilled and experienced nature conservationists. This would ensure that funding can build on already identified best practice.

Information received from NRW (ATI-19096a) shows that as the Statutory Environmental Body and leading organisation charged with nature conservation responsibilities in Wales, NRW does not have a clear awareness of its own staff skill-set with regard to the skills and experience needed to halt and reverse the declines in nature.

It is imperative for any organisation to employ and retain staff that have the skills and experience needed to further the organisation's objectives, and to ensure that those staff work in areas within the organisation where their skills and experience are best placed to effect positive change. This is even more important in nature conservation as it depends on highly skilled nature conservationists, taxa experts and habitat managers to determine the appropriate course of action required to halt and reverse the declines of particular species and/or habitats. The skills of a taxon expert take a life-time to build and cannot be substituted or easily replaced.

Since the creation of NRW in 2013, there has been a dramatic reduction in the number of skilled and experienced staff (and job roles) able to help the organisation halt and reverse the declines in nature. Furthermore, NRW do not currently hold information on the number of staff employed by the organisation who are recognised habitat and/or species specialists, nor are there records regarding taxa experts within the organisation, their particular expertise, or whether they have a remit to influence delivery for their area of expertise.

If the organisation charged with halting and reversing the declines in nature has little knowledge of its own internal skill-set with regard to overcoming the challenges facing Wales and its escalating nature emergency, then it is difficult to conclude that the organisation has the appropriate biodiversity remit for the job.

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

Yours Faithfully



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