



## RE: CONSULTATION ON IMPACTS OF COVID-19

Thank you for giving the Marine Conservation Society (MCS) the opportunity to respond to your consultation on the effects of COVID-19 on the Environment and Rural Affairs in Wales.

MCS is the leading UK's leading marine charity. We work to ensure our seas are healthy, pollution free and protected. Our vision is for seas full of life where nature flourishes and people thrive. We have actively been working in Wales to improve the health of Welsh seas for the past 13 years.

### *The Committee would welcome your views on the following:*

- *the scale and impact of the pandemic on your work and/or sector*

### **Environment sector, specifically marine:**

Whilst we appreciate the unprecedented nature of the crisis, we have concerns about the redistribution of civil service work force from Marine and Fisheries Division to work on COVID-19 and the longer term impacts this will have on the Division's work programme, given many projects are already significantly delayed due to Brexit, internal staffing issues and budget restrictions. For example, the identification and designation of Marine Conservation Zones and the development of new fisheries bylaws within European Marine Sites are already lagging several years behind similar work programmes in England and Scotland. A redistribution of staff has delayed this work further and the timeframes for staff returning are unknown.

£1.8 million of the Marine and Fisheries Division budget was recently repurposed in the Welsh Government's May 2020 supplementary budget<sup>1</sup>. This Division of the Environment MEG only originally had £4.9 million allocated for all work areas, which includes planning, licensing, fisheries protection, conservation, and non-cash investments previously made (such as new enforcement vessels). Again, we are concerned that the impact that both Brexit and COVID-19 has had on the ability for the Division to carry out their work programme will be compounded further by a now much reduced budget.

We remain concerned about the continued financial prioritisation of fisheries management within the Division, which is only one work stream within marine management, yet receives a disproportionate amount of its funding which, for many years now, has resulted in a 'squeeze' on funding on all other marine conservation duties. It is well documented that well managed seas with fully functioning ecosystems bring

about economic, environmental and societal benefits.

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<sup>1</sup>Welsh Government supplementary budget explanatory note, May 2020:

<https://gov.wales/sites/default/files/publications/2020-05/1st-supplementary-budget-2020-2021-note.pdf>



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Given the significant impact that Brexit is likely to have on marine and fisheries legislation in Wales, additional funding is needed to re-establish domestic work programmes within the Division, and undertake new work on Brexit bills, given the urgency in which both the Fisheries Bill and Environment Bill are being advanced through Westminster at the current time of writing this.

### **Pollution in Wales:**

We are aware that there is likely to be a significant delay to the introduction of measures to tackle pollution in Wales, e.g. potential delays to the introduction of a Deposit Return System for drinks containers, Extended Producer Responsibility, and charges for single-use plastic items. Without staying on track with much needed introduction of these essential schemes to reduce the amount of single use material and packaging that Wales consumes, we will miss our opportunity to become the “Zero Waste” Nation that Wales aspires to become, especially given that public opinion currently favours the introduction of these schemes.

Further compounding the problem of plastic waste, we anticipate that the level of pollution on Welsh beaches is set to rise over the summer months given that there are now limited opportunities for organisations such as ourselves to be able to undertake beach cleans using dedicated volunteers, coupled with a likely overall increase in domestic coastal holidays.

There is likely to be a lack of survey data from our beach cleans to inform the Welsh Government of the types of materials that are having an impact on our rivers, coasts and seas in 2020. This data for several years now has been used to inform Welsh Government policy on waste.

Waste is a very visible and urgent issue to resolve post COVID-19. As demonstrated by those visiting beaches during lockdown, there was an increase in litter on beaches. The media has also highlighted an increase of fly tipping and now fast food waste with lockdown restrictions being eased.

### **Agricultural pollution:**

At the most recent CCERA Committee scrutiny session with the Environment Minister (June 2020), the Minister announced that there will be no introduction of the Agricultural Pollution Regulations until the virus has passed.

We have serious concerns about the delay to statutory management of agricultural pollution, given that pollution incidents in rivers and on the coast continue to occur. For example, only a few weeks ago a pollution incident was reported to NRW whereby a slurry spill into the Afon Peris in mid Wales resulted in the death of fish and pollution of at least 4km of the river<sup>2</sup>. The estimates conducted by Natural Resources Wales, tell us that the population of sewin and brown trout in Welsh river systems is on the decline, in the case of some rivers significantly so.

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<sup>2</sup> Slurry pollutes 4km of a river in mid-Wales, NRW, May 2020: <https://naturalresources.wales/about-us/news-and-events/news/slurry-pollutes-4km-of-a-river-in-mid-wales/?lang=en>



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The Welsh Government need to take an ecosystem based approach to ensure that river systems are not overloading by the cumulative and combined effects of diffuse pollution - we need stricter requirements, better enforcement of good practice and a greater sense of urgency from Government on this matter.

### **Impacts on the Marine Conservation Society (MCS) as a charity:**

COVID-19, and the subsequent actions taken by the government, have impacted the programmes MCS is able to deliver, the ways that stakeholders can engage, our ability to raise funds and the ways we work together. Therefore, we have modified the programme of our activities and methodologies, for example by increasing our focus on, and capacity for, on-line activities.

We have reviewed our expected income projections for 2020/21. We are anticipating income reduction of between 31-45%. However, if the impacts of the crisis affect our ability to carry out mass engagement activities for longer than 6 months, and if there are rolling lock-downs, then we anticipate that our income could be further affected, resulting in a further reduction from our initially projected 2020/21 income.

To address the expected fall in income, without the need for redundancies, we have reduced our expenditure, as far as possible, by furloughing a third of our staff, freezing salaries, cancelling most recruitment plans and cutting training budgets, as well as savings as a result of reduced travel and event expenditure. We have paused plans for new projects, and will only invest in them if they are a key organisational priority and we receive restricted funding for them, which includes a significant contribution to our core expenditure on the programme related to the new project.

- *how Welsh Government action to date has helped to combat the impact of the pandemic*

As detailed in the bullet above, MCS has had to furlough staff due to COVID-19, for which we are grateful to the Government in helping to address budget shortfalls.

Recognising that COVID-19 impacted fishers in Wales and their potential ability to generate income, which could have jeopardised the industry's ability to bounce back from this national health crisis, we welcomed the April announcement from the Welsh Government to support the sector through a Welsh Fisheries Grant. We would have hoped however that similar COVID-19 relief packages would be made available to other coastal sectors that have been impacted by the virus, such as hospitality and tourism. A recent press article speculated that up to 100,000 jobs in tourism and hospitality in Wales could be lost as a result of the virus<sup>3</sup>, representing 10% of the workforce in Wales.

- *what further steps the Welsh Government should take*

Now is the time to rethink. We will be in a recession regardless of immediate policies.

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<sup>3</sup>Tens of Thousands of Tourism Jobs Could Go in Wales, Shropshire Star, 21<sup>st</sup> March 2020:

<https://www.shropshirestar.com/news/local-hubs/mid-wales/2020/03/21/tens-of-thousands-of-tourism-jobs-could-go-in-wales/>



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Funding Green and Blue infrastructure can offer improved environment, jobs, sustainable business enterprises, social benefits, economic security and cost savings. Funding a clean, zero-carbon economy may require short term borrowing, but if coupled with an effective green funding package, this could be sufficient without the need for tax rises.

Furthermore, it has been demonstrated that the economic, technological, and health benefits of environmental regulation greatly outweigh the costs. The costs of environmental regulation do not significantly change overall productivity, or GDP<sup>4</sup>.

### Re-investment in our natural environment, coasts and seas:

Given the results of recent poll, which highlighted that majority of people want the environment to be prioritised as part of an economic recovery from Covid-19 (IPSOS-Mori April 2020), Welsh Government should take on board the current groundswell of support for radical changes and improve the natural environment in Wales, in order to maximise on the benefits seen by lockdown due to decreased human disturbance.

As a charity, we are re-budgeting and reprioritising. Welsh Government are undertaking the same process, and we are deeply concerned on the impact this will have on funding environmental management as a whole but, in particular, marine management, given this is already of low priority within Government and chronically under-funded. The Welsh sea area managed by the Welsh Government covers approximately 30,000km<sup>2</sup>, which is **a third bigger** than the land area that it manages (comparatively, around 21,000 km<sup>2</sup>) and has huge potential for social, economic and environmental recovery.

Over 60% of the population of Wales also live and work on the coast.<sup>5</sup> The marine environment provides a wealth of benefits supporting the well-being of coastal communities and wider society. These include, but are not limited to:

- a range 'ecosystem services' such as sequestering carbon, recycling nutrients and mitigating coastal erosion
- food from fish and shellfish, and renewable energy from wind, waves and tide. Fisheries in Wales are thought to contribute over £20.8 million to the Welsh economy annually<sup>6</sup>.

<sup>4</sup> A Green Plan to Beat Tomorrow's Downturn, New Economics Foundation, Jan 2020:

<https://neweconomics.org/2020/01/recession-ready>

<sup>5</sup> Wales Marine Evidence Report Summary document, 2015: <https://gov.wales/sites/default/files/publications/2018-05/wales-marine-evidence-report-wmer-summary.pdf>

<sup>6</sup> Welsh Government consultation: Brexit and our Seas, 2019:

<https://gov.wales/sites/default/files/consultations/2019-05/marine-and-fisheries-policies-for-wales-after-brexit-consultation-document.pdf>



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- jobs for local communities relating to, for example, fisheries, aquaculture, renewable energy, tourism and recreation<sup>7</sup>. In 2018 holiday visitors brought £6.3bn to the Welsh economy<sup>8</sup>.

The Welsh Government needs to widen their narrow focus from the push for 'blue growth' of marine renewable energy to look at the much wider benefits that healthy coasts and seas can bring to the Welsh economy and society, such as those highlighted above.

With regards to ecosystem services for example, coastal and marine environments play a significant role in carbon storage, which is often overlooked by policy makers. Blue carbon habitats have been ranked among the most intense carbon sinks in the world and have been found to be disproportionately important in sequestering CO<sub>2</sub> compared with terrestrial habitats.<sup>9</sup> Seagrass meadows and saltmarsh habitats store twice as much carbon as terrestrial habitats per unit area and, unlike terrestrial soils, their underlying sediments never become saturated with carbon, yet these habitats have significantly declined in Wales over the past hundred years<sup>10</sup>.

Post-COVID plans to tackle climate change and halt biodiversity loss must extend into the coastal and marine environment in order to maximise carbon capture opportunities at sea as is happening on land. Much greater consideration needs to be given by the Welsh Government to supporting marine 'public goods for public services' and rewarding/incentivisation of ethical and "carbon-friendly" seafood choices.

There is a growing body of evidence to suggest that access to the coast can benefit human wellbeing. Investment in green and blue spaces to enable better social prescribing post-COVID will reduce mental health and obesity, which have proven to be more effective than traditional measures. The overstretched health service will need significant investment, looking at improving learning from best practice and novel approaches.

Post-COVID funding for a 'green recovery' needs to ensure that nature based solutions include opportunities for sea and coastal restoration alongside terrestrial. Increased funding for marine management will help to deliver these commitments and restore confidence in the Welsh Government to be *the* Government for improving environmental standards.

With this in mind, a clear de-prioritisation of nature through the reduction of the NRW grant by £7.5 million in the May supplementary budget<sup>11</sup> is counterproductive to a green and blue recovery, given the value added by NGOs and their important role in administering nature based solution, management, recovery,

<sup>7</sup> Welsh Marine Evidence Strategy, 2019-2025: [https://gov.wales/sites/default/files/publications/2019-09/welsh-marine-evidence-strategy\\_0.pdf](https://gov.wales/sites/default/files/publications/2019-09/welsh-marine-evidence-strategy_0.pdf)

<sup>8</sup> Welsh Government, Priorities for the Visitor Economy, 2020-2025: <https://businesswales.gov.wales/tourism/welcome-wales-priorities-visitor-economy-2020-2025>

<sup>9</sup> National Assembly for Wales Senedd Research Blue Carbon Research Briefing, Dec 2019: <https://senedd.wales/Research%20Documents/19-080%20Blue%20Carbon/19-080-Eng-Web.pdf>

<sup>10</sup> Natural Resources Wales State of Natural Resources Report, 2016: <https://naturalresources.wales/evidence-and-data/research-and-reports/the-state-of-natural-resources-report-assessment-of-the-sustainable-management-of-natural-resources/?lang=en>

<sup>11</sup> Welsh Government supplementary budget explanatory note, May 2020: <https://gov.wales/sites/default/files/publications/2020-05/1st-supplementary-budget-2020-2021-note.pdf>



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education and well-being. Without this vital money, the Welsh natural environment will suffer further degradation.

### **Improvements to agricultural pollution, waste management and transport:**

As we leave the European Union, we need to ensure that the Welsh Government has in place sustainable farming schemes and support for communities to restore river habitats. We support the proposed 'public goods' scheme as we think this will embed better practices that will improve rivers and coastal water quality, alongside many other environmental benefits that farmers would be properly rewarded for.

Fresh concerns over inappropriate disposal of PPE<sup>12</sup> has re-raised the issue of waste, litter and single use plastics in Wales. The need to move to a circular economy is imperative, as is a reduction of food waste and improved infrastructure for repair and reduction of waste, and improved insulation and heating methods.

There must be a renewed focus on clean, green transport making it easier, cheaper, safer and convenient to walk, cycle or use public transport. This will reduce the risks of 'second spikes' and bring additional health benefits such as fitness and mental health, reducing the burden on health services for primary care.

- *any other areas within our remit you wish to draw to our attention*

We are looking at an obesity and mental health crisis both of which can be mitigated by active volunteering. MCS have thousands of volunteers who undertake outdoor citizen science as part of beach cleans, which in the current lockdown are unable to do unless locally. Once lockdown is eased, we hope to empower people to volunteer for us once again.

Thank you for the opportunity to feed into this consultation. We hope you find our feedback helpful. If you would like to discuss any of our points in further detail, please do not hesitate to get in touch.

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<sup>12</sup> PPE washes up off French coast raising concerns over impact pandemic is having on environment, The Independent, 28<sup>th</sup> May 2020: <https://www.independent.co.uk/news/world/europe/ppe-french-coast-coronavirus-pandemic-environment-a9537116.html>