

Senedd Cymru  
Y Pwyllgor Newid Hinsawdd, Amgylchedd  
a Materion Gwledig  
Ymgynghoriad ar effaith argyfwng  
Covid-19  
CCERA(5) CP 14  
Ymateb gan Cyfoeth Naturiol Cymru

Welsh Parliament  
Climate Change, Environment and Rural  
Affairs Committee  
Consultation on the impact of the Covid-19  
pandemic  
CCERA(5) CP 14  
Evidence from Natural Resources Wales

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## Background

As the largest Welsh Government Sponsored Body with almost 2000 staff, we welcome the opportunity to respond to this consultation. The role and responsibilities of NRW are varied and wide ranging, and are set out below:

- **Adviser:** principal adviser to Welsh Government, and adviser to industry and the wider public and voluntary sector, and communicator about issues relating to the environment and its natural resources
- **Regulator:** protecting people and the environment including marine, forest and waste industries, and prosecuting those who breach the regulations that we are responsible for
- **Designator:** for Sites of Special Scientific Interest – areas of particular value for their wildlife or geology, Areas of Outstanding Natural Beauty (AONBs), and National Parks, as well as declaring National Nature Reserves
- **Responder:** to some 9,000 reported environmental incidents a year as a Category 1 emergency responder
- **Statutory consultee:** to some 9,000 planning applications a year
- **Manager/Operator:** managing seven per cent of Wales' land area including woodlands, National Nature Reserves, water and flood defences, and operating our visitor centres, recreation facilities, hatcheries and a laboratory
- **Partner, Educator and Enabler:** key collaborator with the public, private and voluntary sectors, providing grant aid, and helping a wide range of people use the environment as a learning resource; acting as a catalyst for others' work
- **Evidence gatherer:** monitoring our environment, commissioning and undertaking research, developing our knowledge, and being a public records body
- **Employer:** of almost 2000 staff, as well as supporting other employment through contract work

## Overview

1. The introduction of Lockdown, with social distancing and controls on movement for all but essential activities, brought with it major challenges in the way NRW operated. Through our Pandemic Emergency Plan, only a limited number of activities were deemed essential, and all other work was either switched from office to home working, or where site visits were non-essential, work was curtailed and transferred to alternative projects which could be undertaken within government guidelines.
2. Those essential work areas included:
  - a. Protection of public safety and public health (e.g. flood warning and flood response),
  - b. Protection of the environment (e.g. attending serious pollution incidents),
  - c. Supply of essential products and services to the economy of Wales (e.g. timber harvesting for production of pallets), and,
  - d. Good stewardship of our land, assets and the Welsh Government Woodland Estate (e.g. maintaining the land we manage).
3. Our investment in information technology and associated systems over recent years enabled NRW to quickly increase its already well-developed ability for remote and homeworking for most staff. Because of this, the business was able to operate successfully away from the office environment and liaison with Government and other customers and stakeholders continued as near to normal as possible. This ICT flexibility, including using on-line meeting software, allowed us to retain good communications and maintain key business meetings with others. For example, stakeholder work on Environmental Principles and Governance; Four agencies regulatory and Statutory Nature Conservation Bodies meetings; meetings with business sector groups e.g. CBI.
4. Our preparation for the outcomes that Brexit may generate have proven to be both extremely useful and resilient for what we have faced during the pandemic. We have been able to use our incident preparation to tackle many of the issues and to refine them as a result of unexpected and unforeseen consequences. The additional resources we had put in place for the Brexit work has also been invaluable in amending our approaches and reacting positively to the challenges thrown up by Covid 19. This includes the rapid development of a range of Regulatory Decisions, to inform our regulated customers how we will manage key legislative decisions in difficult and unusual circumstances.
5. We have continued to maintain excellent links with our external partners throughout. We liaise with eNGOs on a weekly basis, and have agreed approaches we can take together, especially when it comes to how we manage the public's access to the outdoors. A useful example of this relates to Access and Recreation Guidance, both from the Advisor and Land Manager perspective, which we shared with Visit Wales and

other partners.

6. Overall, as an organisation we have adapted to the lockdown extremely well, and in many parts of our business we continue to deliver. We are still managing the impact of the pandemic on NRW as a serious incident' and so need to ensure we can prioritise and deploy our resource for those critical activities where we need to. This may mean we need to pause other areas of our work to free up time, but through our horizon-scanning work we are confident we are taking account of the risks to the business in doing this.
7. Our focus is now to:
  - a. continue to manage our response to Covid in the best way for our organisation,
  - b. further the recovery work to enable us to adapt to changes in WG advice,
  - c. consider future risks such as managing the EU Exit work alongside the Covid response, and
  - d. ensure we can perform our incident response duties as required should we experience any further environmental incidents, such as flooding, pollution or even drought.

## **Q1. The scale and impact of the pandemic on your work and/or sector**

8. As the Covid-19 crisis began to impact more significantly, we quickly focused our efforts on what was needed to manage risk – both to NRW internally and to our external facing services and customers. As a Category 1 responder, we have significant expertise in dealing with incidents, and so we moved into incident response mode to ensure we could manage the situation effectively.
9. Our initial concern was our staff and the effects on their health and wellbeing, as well as ensuring effective business continuity of our prioritised business activities. We activated our Pandemic Emergency Plan, establishing our Incident Response and Recovery Group (IRRG) to provide strategic leadership and governance of how we manage the incident. Underneath that, our tactical IRRG, made up of different workstreams (cells) manages specifics in different areas of the business, including the detail and technical expertise required.
10. Our priorities in managing this incident have included:
  - a. Ensuring a focus on staff wellbeing, with regular messaging and support given from line managers. We fully appreciate that staff need to work flexibly and have home commitments with children and other family members to consider, and we gave advice and guidance to support and reassure all.

- b. Ensuring that Government and Public Health Wales guidance and guidelines are being implemented fully across all our activities.
- c. We took a precautionary approach with our fieldwork activities, giving colleagues clear guidance on what they could and could not do, issuing letters to those considered key or essential workers to allow them to travel on NRW business or take advantage of the childcare opportunities at schools.

- d. As Welsh Government guidance changed, we carried out reviews of our fieldwork activities, to see if we were able to restart any work. We have developed further guidance, producing a traffic light approach to help the different business areas to assess the risk of allowing activities to restart.
- e. Initially, we carried out daily reporting on staff availability for our prioritised business activities using our recently updated business continuity plans. As we emerge from the phases of lockdown, this reporting is now being undertaken weekly.
- f. We kept daily monitoring of all our incident response rotas to ensure we had the ongoing capability to respond to other incidents and could be sighted on any issues needed us to act quickly and move resource if required. As yet, we have not needed to do this, but we are continuing to monitor the situation.
- g. Attendance at the four Strategic Coordination Groups (SCG's) and the Tactical Coordination Groups (TCG's) across Wales, where we supported the multiagency response as required.
- h. We provided guidance to all staff, external customers and partners, on many different subjects, including: procurement; regulation; access to the estate; and HR advice. For example, we amended our Commercial approach and have notified colleagues and our customers of those changes. We had mechanisms in place, through the tactical IRRG cells to bring issues to the discussion and provide advice to colleagues and external partners and customers very quickly.
- i. We recognised that some parts of the organisation are under more pressure with the Covid response than others, and identified business critical work, and so we have put mechanisms in place to allow reprioritisation of resource across teams if needed. We also have a process to support any mutual aid requests that come into the organisation from Welsh Government or our Multi-agency partners.
- j. Our Leadership Team focused on horizon scanning, looking at the short, medium and long-term risks and opportunities for the organisation. This includes thinking through issues affecting delivery, finance, our staff, our partners, reputational and environmental. It also gave us the opportunity to consider what we have found beneficial from the situation that we want to take into our future ways of working.
- k. Whilst dealing with the immediate impacts of the Covid incident, we started to think through what Recovery would need to look like. Conscious that the situation is changing all the time and we need to be ready to act, we have invested time into thinking through our recovery and renewal and the principles around this to give us a framework to plan and prepare for a return to life after Covid.

11. We continue to treat Covid as a very live situation, ensuring we understand the advice and instruction from WG on how we should respond to the crisis.

## Engagement

12. From the outset, we were determined to continue to work closely with partners and customers throughout the health emergency. Three groups have been a particular focus for us: our regulated customers, who we have supported in a variety of ways, including easing payment terms and supporting through different phases of Lockdown; the timber trade; and the Environmental NGOs, for whom Covid-19 has presented some massive challenges.
13. We have continued to maintain excellent links with our external partners throughout. We liaise with eNGOs on a weekly basis, and agree approaches we can take together, especially when it comes to how we manage the public's access to the outdoors. One useful example relates to Access and Recreation both from the Advisor and Land Manager perspective that we submitted to Visit Wales and shared with partners.
14. Stakeholder meetings such as the Wales Land Management Forum and its sub-groups have continued to take forward key work at the same pace as prior to the pandemic, ensuring that disruption to this important work was kept to a minimum. In some cases, new groups were established during the lock-down to ensure that planned initiatives have developed as initially planned. Staff have also been able to keep up with their continuing professional development (CPD) via innovative solutions e.g. Civil Service Training courses and Institute of Chartered Foresters 'members hour' lectures and talks via Zoom. The only disruption was mainly focused on staff ability to balance homeworking with their personal health issues and family commitments due to school closures, etc.
15. NRW had planned a number of consultation exercises during the lock-down period. In these cases, we have proceeded with the publication of the consultation documents but have been mindful of how the pandemic may affect respondees. Therefore, we have extended the consultation period beyond the normal 3 months in order to provide more time to respond, for example, consultations such as the that on "Changes to guidance for assessing the impact of ammonia and nitrogen from agricultural developments" have been extended.

## Grants

16. To support the work of our valued eNGOs through the pandemic, we have developed a £1.2m Strategic Allocated Funding Grant pot to support people's connection with nature through safe access to land owned and managed by those eNGOs. The grants offer one-year funding and, recognising the urgency of need, we have streamlined the

procedures and are working closely with the eNGOs to ensure that they are supported through the application process.

## Resources

17. Where pressures have increased to deal with Covid related incidents and issues, some of our planned work has been postponed in order to free up resources. These pressures have not only been caused as a direct effect of new Covid 19 workloads, but also through reductions in our resources. As described above, staff productivity has been affected by the Government guidelines on movement (e.g. home schooling) and illness. Although we have seen some staff affected by the virus, our records show the direct impact to staff has been, very fortunately, quite low.
18. As you will be aware, we have written to the Committee separately on our response to staff wellbeing and health and safety following our recent scrutiny session. We appreciate that remote working for staff can have an impact on their well-being and will continue to engage with and listen their views to inform our future model of working after the pandemic recedes.
19. Due to the impact on staff, we have re-prioritised our work programme to accommodate both the increase in workload and reduction in resources. This will mean that some of our expected 2020 outcomes will be delayed. This has also had an impact on our preparatory work for Brexit, as there have been substantial delays at EU, UK and WG level due to the impacts of Covid, as well as the impact of Covid on our own work.

## Field Working

20. The biggest impact for NRW came with the cessation of field work deemed to be non-essential. Much of the routine monitoring continued as the organisation has operated with telemetered data collection for some time. However, non-routine site visits, which often require staff on the ground, could not be undertaken. Other external engagement, including on-site meetings with customers, also ceased and this has led to a back-log of work and delays in providing consents and other permits in a number of situations.
21. To overcome some of these issues we altered our approaches to many of our tasks to both look at ways of undertaking our remit in different ways, to consider new ways of undertaking the task such as through remote monitoring, and to change processes to push the field work component to the back of the work packages. With the recent relaxation in travel and social contact we are now programming these site visits in order to catch up with this work and believe we can now deliver our outcomes on time, or with minor delays.
22. The impact of Covid on demand and supply of Welsh products has created challenges and increased workloads for NRW. Examples include ensuring the right guidance and

regulatory procedures were in place. When milk demand dropped and farms and dairies were left with excess milk that needed disposal, NRW had to undertake work both to assist and advise farmers and ensure the right disposal options were available and used. We ensured this happened quickly and worked and supported Welsh Government to ensure sound approaches were promoted that limited the impact both for the farmer and the environment. Other examples include dealing with waste beer, meat processing issues, fallen stock removal, and egg distribution difficulties due to a lack of packaging. We also faced an increase in fly-tipping cases as Community waste recycling facilities closed.

23. Our incident response to floods, pollution, potential drought and other issues continued as normal and new procedures were established to ensure our staff well-being and those of our stakeholders and the public at large were protected and undertaken in line with Government guidance. There were some concerns that where we were unable to gain telemetered data, and with fewer people travelling and undertaking their normal work, we may see an increase in unreported incidents. The delay in recognising that an incident has occurred reduces the chance of both identifying the cause and reducing the harm to the environment. This has largely not happened and instead we have seen the public becoming more aware of their local environment and responding in good time.
24. Because of the importance of timber to the energy and freight sectors, and to the economy in general, very early on in lockdown we decided to do all that we could to enable ongoing production, provided our staff and contractors could maintain physical distancing and health and safety more generally. We have worked closely with the timber industry throughout lockdown to ensure that already sold timber could be uplifted from our forests and new stocks brought to market. In April uplift from our sites fell to 50% of what was previously planned, but this rose quickly to 75% in May and over 100% in June. All timber processors are now back up and running, and we are pleased that we have been able to strengthen our relationship with the timber sector by the way in which we have worked and communicated with them during Lockdown. We also maintained our regular timber sales, with the next in September 2020.

## **Budgets**

25. Funding has been an issue for us during the incident; and this will become a greater pressure as we go forward. This is partly due to the reduction in income from some of our permitted activities such as fishing rod licence income. Similarly, as described previously, the market for timber has reduced during the incident.
26. We have been able to make savings, for example, the change to a primarily home working approach in NRW has seen a major reduction in our direct resources use (e.g. energy, water, time), both in running our offices/depots and in our routine travel both to and during work. We are now reviewing the learning from this to adapt our future working arrangements to maintain some of these benefits.



27. However, we expect, as will all public bodies, that the legacy of the crisis will mean a reduction in support from WG in future years due to the need to balance the expenditure required to tackle the current issue. As we look to trim budgets, we are aware that additional funding is required in order to adapt our sites to safely welcome people back into the countryside. Embedding the positive behavior changes and benefits seen from those utilising their local environments for exercise and activity during the lock-down period will need funding, and we continue to work closely with our key partners, Sport Wales and Public Health Wales to ensure that our collective work to increase the activity of the nation is aligned.
28. While we recognise that budgets are being challenged in ways that they have never been before, having the funding to enable us to deliver a prioritised sustainable management of our valuable natural resources (SMNR) is essential to deliver real benefits to all. It is also essential that impacts from additional work and changes due to Brexit are considered and effectively resourced.

## **Q2. How Welsh Government action to date has helped to combat the impact of the pandemic**

29. We have worked closely across Welsh Government departments to ensure that the issues created by Covid 19 were quickly identified and the best solutions were adopted to address them. For other work areas, we maintained our provision of advice and guidance without major interruption.
30. In some cases, we saw the pressure of Covid 19 having a direct impact on WG activity through their staff being seconded to other stretched areas of Welsh Government. In these cases, we stepped up to provide additional support, seconding two members of staff to the Welsh Government Communications Team following a request by the Permanent Secretary to all public bodies. While this created extra pressures for NRW, it was an essential workload to assist the sector and protect the environment. With this support, we were able to provide a timely and authoritative response which helped our customers, stakeholders and the public adopt to the pressures of the incident.
31. Working with Welsh Government, a group of communication representatives from public sector organisations, chaired by Visit Wales, has been meeting weekly to share best practice and to discuss and shape message development around the Covid-19 regulations, and subsequent communication plans to reopen sites as restrictions are eased. This work is informed by research undertaken by Visit Wales and local knowledge provided by NRW, the National Parks, National Trust in Wales, Cadw and other NGOs, and is designed to provide detailed insight into the sentiment and feeling within communities in Wales to help inform our communication messages around the reopening of outdoor sites.

32. These meetings have been hugely beneficial, enabling us to appear unified in our messaging to local communities in Wales and to visitors looking to travel to our outdoor attractions. It has provided an effective platform for horizon scanning for potential issues and opportunities that we have been able to address in partnership where appropriate. It has also led to the development of a new pledge campaign called 'Addo' (Welsh for Promise), which encourages everyone travelling around Wales to care for each other, the land and our communities.
33. This long-term campaign will enable us to see the network evolve in the future and has also led to opportunities to develop further communication activity in partnership with other bodies on other key areas of work.

### **Q3. What further steps the Welsh Government should take**

34. There is a collective sense that has been a lack of long term thinking and planning across governments more generally, and this has been evident in the lack of preparation for the pandemic and of resilience in response to it. We at NRW are fortunate that our position as a Category 1 responder; our previous investment in technology and our preparedness for a Brexit no deal enabled us to respond quickly and effectively to the pandemic, and it would be valuable to adopt this approach across Government and other public authorities.
35. The success outlined above in using new software communication technology to make connections and allow easier and more flexible engagement between bodies and individuals should be reviewed and expanded. For example, our Covid Renewal work has highlighted that WG and NRW should further encourage the use of information exchange, workshops and CPD through more regular contact with other professional membership bodies. Additionally, this could play a key part in ensuring quicker and broader engagement across sectors resulting in better policy development and engagement.
36. It is important to appreciate that whilst the circumstances were unprecedented, the individual impacts and our collective response could and should be understood and improved upon. It has also demonstrated that where necessary, public bodies are able to move very swiftly to make changes, and the acceptance of large-scale public sector interventions in society and the economy have been largely normalised. These changes, such as the reduction in the use of cars, have the potential for a lasting positive legacy not only to the health and wellbeing of the nation, but also to our local environment and natural world. We would like to build on this to ensure that agile decision making can feature more prominently in the way that we approach the climate and nature emergencies.
37. As an evidence-based organisation, we are keen to capture the momentum of increased public interest in expertise and science, and we welcome the opportunity to work with

partners on the intelligence and data within our Area Statements and State of Natural Resources Reports (SoNaRR) to help inform decision making, and ensure the sustainable management of our nation's natural resources.

38. We warmly welcome the cross-cutting approaches adopted in some parts of WG, such as the Climate Team Wales approach, and suggest that this be further adopted so that cross-cutting issues can be picked up across various departments. This approach also needs to be extended across #TeamWales, as we believe certain organisations should be automatic partners of choice to act as Governments key technical advisors and this will need leadership to draw organisations together, so that the value of collaboration is understood by all. Again, this is an historic cultural issue and we hope that the collaborative approach taken during the pandemic will be extended beyond the response to Covid 19 so that it is embedded within future behaviours.
39. After all major incidents it is key to learn the lessons and ensure these are adopted across the business and built into its culture, so that our next response benefits from this learning. We expect that WG will undertake a similar exercise, and we look forward to working with WG colleagues on our shared learning so that lessons can be adopted into future working practices.

## Green Recovery

40. The impact on communities from the pandemic has been unique; and as a consequence, we have seen very positive local benefits as people have come together to deal with the incident. As you will be aware, Sir David Henshaw, NRW Chair, has been tasked by the Minister for Environment, Energy & Rural Affairs with leading a group to explore a truly Green Recovery. The group will feed into the Minister's EU Transition Roundtable and is tasked with using their networks to help identify practical, innovative and fair approaches that meet the needs of communities in Wales, while accelerating the response to the climate and nature emergencies. We understand that Sir David has written to the Committee with regards this work and will keep you updated on progress.
41. From an NRW perspective, we believe there are real opportunities to be gained from maintaining the positive community reactions exhibited during the pandemic, and we are considering how we can play our part as an organisation in maximising these benefits into the future. This includes looking at Climate Change improvements from changes in travel practices through to greening local areas through tree planting. A programme of work is being developed, building on the success we have had through the recent publication of our Area Statements documents. We are also working with businesses to see how local markets can be maintained following their recent success.
42. While we appreciate that budgets will be challenged for some time to come, we must use this opportunity to consider how to maximise the value of future investment and look

at the opportunity cost for failure to invest in the infrastructure and systems required to support a Green recovery. An example of this is supporting the growth of sustainable energy generation in the marine environment, as funding will be required to deliver the Marine Renewables Consenting Strategic Advisory Group Action Plan. The focus is on evidence collection to support decision-making and the delivery of research outputs likely also to support the research sector in Wales.

#### **Q4. Any other areas within our remit you wish to draw to our attention**

43. While the pandemic has impacted on our work, we are continuing to deliver outcomes set by Welsh Government, including the second iteration of State of Natural Resources Report (SoNaRR). We have agreed with Welsh Government that SoNaRR2020 will be published in 2 phases, with the first phase due to be published in December 2020.
44. As you will be aware, the purpose of SoNaRR is to provide the evidence base and assessment of the extent to which Sustainable Management of Natural Resources (SMNR) is being achieved (including our assessment of biodiversity). The report will identify challenges and opportunities in the management of natural resources, together with gaps in the information needed to do this. The second phase will be published by 31<sup>st</sup> March 2021 and will include more detail on our website, but we will of course inform the Committee of the launch of the report closer to the time.
45. We will also be consulting on the nation's Vision for the Environment by 2050 within the next six months and will let you know how Committee members and the wider public can get involved in this work.