

Cynulliad Cenedlaethol Cymru

Y Pwyllgor Amgylchedd a Chynaliadwyedd

NRW 2015 – 83

Cyfoeth Naturiol Cymru – Craffu Cyffredinol 2015

Ymateb gan Chartered Institute of Ecology and Environmental Management (CIEEM)

Introduction

1. The Chartered Institute of Ecology and Environmental Management (CIEEM) is the leading organisation representing and supporting professional ecologists and environmental managers in the UK and Ireland. CIEEM was established in 1991 and received its Royal Charter in 2013. The Institute has led the way in defining and raising the standards of ecological and environmental management practice with regard to biodiversity protection and enhancement. It promotes knowledge sharing through events and publications, skills development through its training programme, and best practice through disseminating technical guidance.
2. CIEEM has more than 5,000 members drawn from local authorities, government agencies, industry, environmental consultancy, teaching/research, and voluntary environmental organisation.
3. Natural Resources Wales is the largest employer of ecologists and environmental managers in Wales.
4. CIEEM (Welsh Section) welcomes the opportunity to respond to this consultation. We have the following comments to make on our experience of working with Natural Resources Wales and the delivery of its statutory functions in its first two years of operation.

Skills and knowledge in NRW

5. CIEEM (then called IEEM) commissioned a review on the availability of ecological skills in the UK (IEEM, 2011). This concluded that ecological skills in the UK are in such short supply that, if neglected further, could seriously undermine our capacity to deliver good natural resource management. The main gaps highlighted were:
 - Species identification - especially for invertebrates, plants and fish
 - Ecological survey, evaluation and monitoring - especially for invertebrates, plants and fish)
 - Ecological Impact Assessment techniques across a range of habitats
 - Strategic Environmental Assessment techniques
 - Habitat creation, restoration and management in marine, coastal and upland environments
 - Techniques to control the spread of invasive species and wildlife diseases.
 - Microbial ecology – particularly poorly understood, especially in relation to biosecurity and ecosystem processes.

6. Wales has high and laudable ambitions to deliver natural resource management and recovery of its biodiversity. NRW clearly has a crucial role in achieving this.
7. Over the last 2 years, it is clear from our members' experience of dealing with NRW that there has been a significant loss from the organisation of ecological skills, precisely in the areas listed above. This is an important issue which we hope that the Committee will address. Voluntary Exit schemes for staff were run in 2013-14 and 2014-15. In 2013-14, we understand that there were a disproportionate number of former Countryside Council for Wales staff (i.e. those mainly with ecological skills) amongst those who left, compared to the proportion of former CCW staff in the current workforce as a whole.

Ecology, nature conservation and biodiversity – profile, resources and statutory duty in NRW

8. Over the last 2 years, it has been noticeable to our members that the profile of NRW's work in the areas of ecology, nature conservation and biodiversity has dropped considerably. This is evident in the organisations media profile and in the jobs it has recruited externally. We had hoped that NRW would play a leadership role for this area of work and for the profession in Wales.
9. We do not have access to data on trends in the level of resources that NRW is putting into ecology/nature conservation/biodiversity and this is an area which we hope that the Committee will investigate. It is noticeable that in the area of European Protected Species (EPS), personnel resources, and their experience, appear to have declined resulting in confused and conflicting approaches and responses; additionally it has also been noted that responses to, and indeed apparently interest in, ecological issues other than those surrounding EPS (e.g. reptiles) have been devolved to Local Planning Authorities which do not themselves necessarily have the resources or appropriate experience to deal with as necessary.
10. It is important to note that NRW's work in this area is based on statutory duties and is not discretionary and is essential to meet biodiversity targets. We recommend that the Committee should seek data from NRW on the achievement over the last 2 years of specific statutory functions on nature conservation and biodiversity (e.g. designation of Sites of Special Scientific Interest, National Nature Reserves) and the allocation of resources to this work.

Culture of NRW

11. Our members have had a positive experience over many years of working in partnership with the predecessor bodies of NRW and clearly wish this to continue with the new organisation. However, we have noticed what is best described as a change in NRW's culture in working with other organisations: from a partnership-based, enabling, approach to a more contract-based (supplier) approach. We appreciate that NRW is now a large multi-faceted organisation and has to ensure value for money. However, it would be a backward

step to lose the co-operative, partnership-based ethos which will be needed to meet Welsh Government's objectives on integrated natural resource management.

12. Our members report that over the last 2 years NRW has become a very Cardiff-centric organisation. The profile of the organisation in North and Mid Wales has declined. The majority of senior (Executive Team) staff are based in Cardiff and new appointments at this level have all been in Cardiff. There is a feeling of resources draining from North and Mid Wales where the Forestry Commission and Countryside Council for Wales HQs were sited.

Independence of NRW

13. The Welsh Government's 2012 consultation on Natural Resources Wales stated that the body would be "independent, respected and professional" and CIEEM supported this aspiration in our consultation response. We recommend that the issue of NRW's independence, its track record to date in providing timely, objective advice and how decisions have been made, should be examined by the Committee. CIEEM members are aware of the emerging concerns about NRW's independence and the extent to which the NRW has responded to pressure to change its position on some contentious planning cases. These concerns undermine the image of NRW as a respected and professional organisation which can take a leading role in the profession of ecology and environmental management in Wales.

Summary

14. We would recommend that the Committee:

- a) looks at the level and diversity of ecological skills and experience of NRW's staff, and makes recommendations as necessary;
- b) looks at NRW's overall ecology/nature conservation/biodiversity staffing levels and resources and makes recommendations to ensure that staffing levels are in fact sufficient to deliver NRW's statutory functions across Wales (i.e. its geographical representation);
- c) examines the leadership role of NRW (to include co-operative and partnership working) in respect of ecology and environmental management and make recommendations as necessary
- d) gathers, reviews and publishes data on nature conservation and biodiversity statutory functions and achievements since NRW's inception and provides a forward looking response to any issues raised; and
- e) examines the independence of NRW in exercising its statutory functions.