

Cynulliad Cenedlaethol Cymru Pwyllgor Amgylchedd a Chynaliadwyedd	National Assembly for Wales Environment and Sustainability Committee
Egwyddorion cyffredinol Bil yr Amgylchedd (Cymru)	General principals of the Environment (Wales) Bill
Ymateb gan Sefydliad Rheoli ac Asesu Amgylcheddol	Response from Institute of Environmental Management and Assessment
EB 23	EB 23



Welsh National Assembly Consultation on Environment (Wales) Bill:

Response by the Institute of Environmental Management and Assessment Introduction

1. The Institute of Environmental Management & Assessment (IEMA) is the professional home of over 15,000 environment and sustainability professionals from around the globe. IEMA's role is to support individuals and organisations to set, recognise and achieve global sustainability standards and practice.
2. Our members lead and deliver sustainability in their organisations at all levels, using IEMA standards as their foundation. Equipped with their extensive knowledge and skills, they improve environmental and sustainability performance and drive competitiveness, productivity, resilience and growth. Through the services we provide, IEMA members continuously improve their knowledge, their influence and their network so that they can play a leading role in making their businesses more profitable, less wasteful and future-proof.
3. As an organisation we are independent and international, gathering members' views and experience to deliver evidence to Governments, information to business, inspiration to employers and great stories to the media that demonstrate how to transform the world to sustainability.
4. When responding to consultations IEMA's key aims are: 1. To inform decision-making based on robust and relevant information available at the time; 2. To remain independent and seek to offer impartial credible professional advice; and 3. Where possible, to consult and engage with a range of interests and groups within IEMA membership.
5. The following response has been produced from consultation with IEMA members based in Wales, and is supported by IEMA's prior research.

Summary of Key points

1. There is broad support from IEMA members for the measures outlined in the Bill
2. IEMA members support the carbon targets included in the Bill. IEMA supports the need for professional urgency on Climate Change and encourages individuals, businesses, organisations and Governments to all show climate leadership.
3. There are calls to examine the timescale of review to ensure a durable, coherent policy landscape which is not subject to short term political change
4. There are calls to align the waste and resource management section of the Bill more towards a more circular economy approach.

IEMA response to Consultation Questions

Question: Do you agree with the Welsh Government’s proposals on definitions for ‘natural resources’ and ‘sustainable management of natural resource’ (sections 2-3 of the Bill)?

1. There was support for the proposals on definitions from the IEMA membership.

Question: Is the Bill clear enough about what the proposals for a National Natural Resource Policy (Section 9 of the Bill) will include?

2. There was overwhelming agreement from IEMA members that the proposals for a National Natural Resource Policy included were clear.

Question: What are your views on the proposals for a National Natural Resource Policy?

3. There is broad support for the proposals for a National Natural Resources Policy
4. There are some concerns from the IEMA membership whether there will be any real benefit that can be delivered from the policy.
5. IEMA members noted that there is nothing in the requirement which gives a timescale for the policy other than it is reviewed with the general election. There should be a requirement to ensure a long term perspective to overcome the political cycle and avoid short term measures being introduced. In prior research IEMA members have called for consistent policy drivers to provide certainty and confidence to organisations (the need for a durable, coherent policy landscape, which is not subject to short term political change)¹
6. IEMA members indicated that the Policy should highlight potential areas that NRW should focus on.

Question: Do you agree with the proposals for area statements (section 10 of the Bill)?

7. There was strong support for from IEMA members in regards to the proposals for area statements.
8. Members suggested that Climate Change, Forests, Sustainable energy resources and flooding should be included in area statements, as well as outlining how the market will be supported in maximising value from our natural resources and waste recovery.

Question: Do you agree that public authorities should have a strengthened biodiversity duty on public authorities operating in Wales?

9. There was overwhelming support from the IEMA membership that public authorities should have a strengthened biodiversity duty.
10. From IEMA’s prior research, 77% of IEMA members don’t believe that Public Authorities in the UK are actively addressing their duty to demonstrate regard for

¹ http://www.iema.net/system/files/position_statement_climate_change_and_energy_v4.pdf

conserving biodiversity in all their actions. Therefore is strong support to both strengthen the duty and the ability of Public Authorities to apply the duty.²

Question: Are you content with the proposals for NRW to have wider powers to enter into land management agreements and have broader experimental powers (section 16 of the Bill)?

11. There is overwhelming support from IEMA Members for the proposals for NRW to have wider powers to enter into land management agreements and have broader experimental powers.

Question: Do you agree with the proposals for the 2050 target?

12. There is overwhelming support for the proposals for Welsh Ministers to ensure that the net Welsh emissions account for the year 2050 is at least 80% lower than the baseline.
13. From prior research, IEMA Members call for climate leadership at all levels. As we approach and exceed environmental limits, IEMA supports the need for professional urgency on Climate Change and encourages individuals, businesses, organisations and Governments to all show climate leadership.³

Question: Should the Bill also include interim carbon targets between now and 2050?

14. There is overwhelming agreement for IEMA members on the inclusion of interim carbon targets

Question: Do you believe that the introduction of carbon budgets will provide a more effective approach than the 3% annual emissions reduction target that is currently in place in Wales?

15. There is overwhelming agreement from the IEMA membership that the introduction of carbon targets will be a more effective approach.

Question: What emissions should be included in targets?

16. There was overwhelming agreement from the IEMA membership that All Welsh Emissions should be included in carbon targets.
17. IEMA Members did express concern over the potential implication of the isolation of Wales from existing controls both at UK and European scales.

Question: Do you agree with the Bill's proposals as to what should happen if the Welsh Ministers fail to meet emissions targets or carbon budgets?

18. There is overwhelming agreement for the proposals from IEMA members

² <http://www.iema.net/news/next-government-must-implement-nature-wellbeing-act-rebuild-uks-natural-capital>

³ http://www.iema.net/system/files/position_statement_climate_change_and_energy_v4.pdf

Question: What should the role of an advisory body on climate change be?

19. IEMA Members identified three key areas for the Advisory Body on Climate Change:
20. 1) It should have powers to initiate changes or improvements in order to meet the targets;
 21. 2) To hold the Welsh government to account if it fails to meet its statutory duties;
 22. 3) To communicate success or failure and then to communicate the consequences of that success and failure, to both the government but also to the Welsh people.

Question: Do you agree that non-domestic premises should be required to put their waste out for collection in line with any separation requirements set out by the Welsh Government?

23. There is overwhelming agreement for this from IEMA members

Question: Do you agree that the Welsh Government needs wider powers to ban some recyclable waste from incineration?

24. There is strong support in the Welsh Government needing wider powers to ban some recycling waste from incineration.

Question: What will the impacts of these waste proposals be for you or your organisation?

25. There is uncertainty over what the impacts of the waste proposals outlined in the Bill will be in organisations. Responses ranged from negative cost implications to having potentially positive cost implications, providing that cost effective collection and suitable infrastructure was implemented.
26. There is also uncertainty over the timescale over which there could be cost implications, with some organisations indicating that whilst there would be no immediate costs, there may be potential costs later on.

Question: Are there other waste proposals that you think should be included in the Bill?

27. There is broad support from IEMA members for the proposals in the bid, with a number of respondents suggesting there should be additional measures included in the bill to align it to circular economy approach.
28. From prior research, IEMA members have called for more work from both organisations and government to align to a more circular approach to resource management. IEMA has found that 89% of IEMA members polled say that according to their experience, they do not believe that Government departments and agencies are joined up in their delivery of coherent and clear messages to help organisations improve the efficient use of resources.⁴

Question: What other proposals do you think should be in the bill?

⁴ <http://www.iema.net/news/members-say-government-not-joined-sustainable-resource-management>

29. IEMA members call for further emphasis on circular economy concepts such as waste minimisation and protection of resources through resource efficiency- shifting the position to conservation of use over end-of-life management.

Question: Do you have any comment on the costs and benefits identified in the Regulatory Impact Assessment?

30. IEMA members suggest the costs and benefits should be in line with UK assessments of this issue

Question: What is the cumulative impact of the costs or benefits of the Bill's proposals for you/your organisation, and are there any other options that would achieve the intended effect of the Bill in a more cost effective way?

31. IEMA members advise that the public authorities should not introduce excessive costs on Welsh businesses that may damage their competitiveness with organisations in the rest of the UK. There are calls to balance the concepts of the Bill's proposals with a national context.
32. IEMA members indicate that it is too early to accurately assess the cumulative costs or benefits of the Bill on organisations.

Question: What are your views on the relationship between this Bill and the Well-being of Future Generations Act 2015 and the Planning (Wales) Bill? Are the links and connections between them clear?

33. IEMA members are clear on the relationship between the bills, and it is a good starting point for further action.
34. IEMA members indicated that Climate Change Adaptation requirements whole should be assessed in line with economic developments aspirations

Question: Are there any other considerations that you would like to share in regards to the Bill?

35. There is broad agreement and support for the Bill from the IEMA membership.
36. IEMA members stress the importance of the rapidly approaching dates of international climate change agreement implementation, and that these should be borne in mind with implementation.
37. IEMA members call for increased emphasis on resource efficiency at all levels. This includes increased consideration of resource management in regards to resources originating from other countries, including managing the interaction externally at the international context.
38. IEMA members indicate that more needs to be done to on the National Natural Resource Policy section, as whilst it may be adequate to protect habitats and biodiversity, it may not be enough to provide protection of other natural resources.
39. There are calls from the IEMA membership to ensure the measures described in the Bill are monitored and that accountabilities are assigned for its delivery.
40. There are concerns as to how prescriptive the bill is, and how that could impact the organisational competitiveness and the overall economic success of the Welsh Economy.