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25<sup>th</sup> November 2020

FOA Assembly Public Accounts Committee,

**RE: Barriers to the successful implementation of the Wellbeing of Future Generations (Wales) Act**

The Marine Conservation Society (MCS) welcome opportunity to respond to your inquiry into the implementation of the Wellbeing of Future Generations Act.

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.

Our primary focus for this response will be in relation to the natural environment. We have answered questions 1, 5 and 6. We have grouped questions together to form one answer, as there were many synergies between the three questions:

**Questions 1) Awareness and understanding of the Act and its implications, 5) Any other barriers to successful implementation of the Act, 6) How to ensure that the Act is implemented successfully in the future.**

MCS have been involved in the development of the Wellbeing of Future Generations Act from Bill stage, including when the 'National Conversation' was first spearheaded by Cynnal Cymru. We have then responded to many consultations over the years from the Commissioner's Office to help shape the implementation of indicators, priority setting, progress reports, etc.

We are deeply saddened therefore that we have been unsuccessful in nurturing any evidenced understanding of the social, economic and environmental importance of our seas and coasts to the wellbeing of people in Wales (see Annex A). A couple of examples:

- There is a very obvious gap in the National Indicators for measuring Wales' marine ecosystem health within the indicator's technical measures: The technical measure for indicator 43 'Areas of healthy ecosystems in Wales' only requires an assessment of 'terrestrial semi-natural habitat'. This means that Wales could meet our target for this indicator, and thus the overall wellbeing goal for Resilience, by having healthy land habitats, whilst completely failing to protect our seas.
- In various consultations, such as the draft report to Public Bodies (March 2020), there has been no considerations given to how our seas around Wales could be better managed by Public Bodies (such as through improving fisheries and protected area management), despite detailed considerations being provided for land management.



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We have repeatedly highlighted to the Commissioner's Office that **the Welsh sea area managed by the Welsh Government is a third bigger than the land area that it manages**, and has huge potential for socio-economic and environmental recovery (see Annex A for details). 60% of people living in Wales also live or work on the coast. Our rainwater, drinking water, weather, climate, coastlines, much of our food, and even the oxygen in the air we breathe, are all ultimately provided and regulated by the sea<sup>1</sup>. Yet, chronic funding limitations and a lack of leadership from Local Authority right up to National Government level, has meant that our seas and coasts around Wales, are not in good shape. For example:

- Recent evidence suggests that marine ecosystems are not fully resilient and that there is a lack of confidence in the conservation status of many protected habitats and species<sup>2</sup>.
- Wales is failing in 11 of 14 indicators of Good Environmental Status (GES), a requirement of the EU Marine Strategy Framework Directive<sup>3</sup>. The target for achieving GES was 2020, which Wales, as part of the UK, has now missed.
- Wales, as part of the UK, is struggling to meet targets for the [UN Sustainable Development Goal 14 'Life Below Water'](#), particularly with regards to reducing marine pollution and ending overfishing.

Given that Wales has recently missed several national and international marine targets, it is critical that future implementation of the Act **must recognise the importance of our marine environment in Wales**, if Wales is to be a world leader in sustainability, and enhance our seas for future generations. Recovered seas bring about, not just environmental, but also economic and social benefits to local communities (see Annex A). There is a wealth of resources within our seas, but a lack of resource and historic mis-management have resulted in a degraded environment that cannot support human wellbeing to its full potential.

Looking ahead to the 6<sup>th</sup> Assembly, there is much to be done in implementing the Act, to recognise the important natural, social and economic resources that Welsh coasts and seas provide, starting with an improvement in the way we measure Wales' resilience, right through to the advice for public bodies and PSBs, particularly those with a coastal remit. **Prioritising the protection and management of our seas is critical if we are to become a healthy, resilient and globally responsible Wales.**

We hope you find our feedback helpful and you would like to discuss any of our points in further detail, please do not hesitate to get in touch.

Yours Sincerely,

*C. Trotman*

Clare Trotman, Policy and Advocacy Manager

*Gill Bell*

Gill Bell, Head of Conservation, Wales

<sup>1</sup> UN Sustainable Development Goal 14, 'Life Below Water': <https://www.un.org/sustainabledevelopment/oceans/>

<sup>2</sup> Indicative Feature Condition Assessments for European Marine Sites, Natural Resources Wales, 2018: <https://naturalresources.wales/guidance-and-advice/environmental-topics/wildlife-and-biodiversity/find-protected-areas-of-land-and-seas/indicative-feature-condition-assessments-for-european-marine-sites-ems/?lang=en>

<sup>3</sup> Good Environmental Status is a requirement of the EU Marine Strategy Framework Directive, 2008: <http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32008L0056>



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## Annex A

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. A recent NRW report (July 2020)<sup>4</sup> highlighted that at least 113 Million tonnes of carbon are already stored in Welsh marine habitats; this equates to almost 10 years' worth of Welsh carbon emissions. It furthermore represents over 170 % of the carbon held in Welsh forests.
- 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>5</sup>.
- jobs for local communities relating to, for example, fisheries, aquaculture, renewable energy, tourism and recreation<sup>6</sup>. In 2018 holiday visitors brought £6.3bn to the Welsh economy<sup>7</sup>.

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<sup>4</sup> Armstrong, S., Hull, S., Pearson, Z., Wilson, R. and Kay, S., 2020. [Estimating the Carbon Sink Potential of the Welsh Marine Environment](#). NRW, Cardiff, 74p

<sup>5</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>

<sup>6</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>7</sup> Welsh Government, Priorities for the Visitor Economy, 2020-2025: <https://businesswales.gov.wales/tourism/welcome-wales-priorities-visitor-economy-2020-2025>