



Welsh Government Consultation Responses

Development of the Natural Resources Policy

July 2017

Consultation Response Form

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Consultation to inform the development of the Natural Resources Policy

Question: *Written feedback on the priority themes and key objectives within them outlined in this document would be welcome as part of this consultation exercise. In particular, taking into account the legal framework and its requirements as outlined in this document, it would be helpful to receive contributions on:*

- ☐ *the key steps that need to be taken in order to deliver on the priority themes and address the key challenges; and,*
- ☐ *the barriers that need to be addressed.*

If you have any related issues which we have not specifically addressed, please use this space to report them:

A huge effort is required, driven centrally and through industry to improve public relations between farmers and taxpayers. Recent publications have done nothing to improve the ill-perceived image of the farmer, holding them responsible for much of the biodiversity declines. We must remind the public that our farmers have done all that has been asked of them, that biodiversity declines are as a result of the imposition of post-war intensification legislation, not their neglect. Also, make it known that only with their ongoing support and pro-activity can we see the biodiversity improvements we aim for. Biodiversity cannot be confined to small protected pockets, but needs to be supported throughout the countryside in the way that taking action upon farmland will allow. We must balance out the current perceptions with positive messages about farmers, furnish them with stories of farmers' successful efforts to support vulnerable species and habitats. Only then will the taxpayer appreciate that they are getting value for money in a wildlife-rich countryside, healthy water and soil and a thriving rural economy which contributes to the overall economy. Thriving biodiversity should be considered a multi-functional aspiration; a thriving biodiversity requires employed support, attracts businesses and visitors, supporting a thriving rural economy, increasing rural employment and investment. Taxpayers should be helped to understand that their money helps farmers to provide ecosystem services that cannot be provided any other way through the market.

Much of our current food production practices are unsustainable and food production will face many co-inciding pressures over the next few decades. Current production methods are degrading the environment and natural resources to such an extent that even production at current levels cannot be sustained let alone support volume increases to feed the predicted 1 billion rise in population by 2030. Only relatively recently have we realised what an essential contribution a bio-diverse, heterogeneous environment is to modern society and life-supporting natural resources, via the ecosystem services it provides and which cannot be replaced by the market. Food production of the

future must set a firm focus on firstly improving then maintaining support of such an environment otherwise it will not just be the wildlife within it that declines.

An increasing proportion of the world are expected to be able to afford “better” food in the near future. On the other side of the spectrum, nutritional deficiencies amongst the less affluent communities must also be addressed so both quality and variety of food will need to be increased. As food of a higher quality generally requires a greater area given over for production, it is clear to see that the pressures on food production in the future are compound.

A new “green revolution” is needed, this time with the welfare of the environment kept firmly in sight, employing a variety of approaches, holistically, current and novel, to break the stubborn yield plateaus we are now experiencing. Many experts in the sector believe that we already possess the knowledge to increase our productivity sustainably but there is no “silver bullet” approach, only the employment of existing techniques combined together is likely to achieve the desired results, and will be enhanced by technological advances.

Focus should be put on educating and incentivising farmers to intensify sustainably through for example techniques such as the integrated farm management approach, or other more novel techniques scarcely used such as agroforestry, alongside the more frequent focus of technological advances.

Post Brexit regulation

Much of EU environmental and agricultural legislation detail was written with strong leadership from the UK, so most of it should remain relevant post-Brexit and therefore be patriated. Of course there are current elements that are widely accepted as obstructive or having little benefit, and these should be the first areas to be amended, such as the 3 crop-rule, but any major changes should take time and careful consideration and consultation. Commitment to long-term plans is required to bring about the benefits to the environment we need. Policies should be created with the needs of all stakeholders taken into account, which could be achieved through the establishment of an independent policy commission, and should complement and align to other linked policy areas such as climate change, education, nutrition and health etc.

In order to improve upon what we have, we must know, confidently, what we have got which the Area Statements have the potential to provide a central data hub. Plans and ring-fenced budgets should be mandatory for, habitat improvements, expansion, restoration, connectivity, and creation with a targeted approach to support our wildlife. Priority must be given to improve then expand those habitats where wildlife already thrives using a variety of tools and practices which have been proven to be successful such as the positive effects predator control can have on populations of declining ground nesting birds. We must first be sure what makes up a “good” habitat. Once the quality of the individual existing habitats is good, focus can be shifted to joining them up, via habitat creation, to create the vital ecological networks. This approach will help us to understand the full suite of requirements and management needed on newly created sites in order to generate and maintain the same levels of biodiversity.

Stronger protection needs to be given to lesser protected sites such as ancient woodlands which are important ecological networks and buffer zones be created around existing special sites to allow for natural ecological processes and climate change. The concept of local communities, businesses and conservation charities etc. partly resourcing such local restoration schemes in order to qualify for local government funding should be used more widely. Similarly, it could be made mandatory to ecologically enhance the large amount of land owned by public bodies such as the MOD, railways,

and church, and funds be made available to support such projects where some resource has already been secured from private organisations and the public.

A centrally-driven initiative should begin to remind private businesses of the positive contribution of being involved in such local conservation initiatives would make to their environmental and social targets, such as carbon sequestration, water resource protection and employee volunteering for example, as a type of voluntary biodiversity offsetting.

The imposed form of biodiversity offsetting policy, through planning applications, should be reviewed as soon as possible as the perception is that it has become a “licence to destroy”. The weakness in Local Government with regards to supporting biodiversity conservation overall is in assessing the successes of their conservation attempts. This is largely due to the lack of competent resource able to conduct or understand post-provision assessments, or lack of resource available to even ensure that agreed conservation efforts are begun and completed as planned. Biodiversity offsetting has the potential to significantly contribute to the UK’s conservation “bank” but it must be adequately and competently resourced to ensure that the expected biodiversity gains are brought to fruition.

It is comforting that Welsh Government has been working towards protecting our heather moorlands, their wildlife and upland economies through Sustainable Management Scheme (SMS). The science has continually proven that the traditional approach to grouse-moor management is supportive of many species, not just game birds and this is now becoming more widely recognised and accepted. Conservation charities and relevant countryside organisations should not become complacent and must continue to investigate and communicate ways to further strengthen the contribution this approach makes to our biodiversity and economy.

Resource protection has fast become one of the top priorities for policy makers. EU policy such as the Water Framework Directive and Cross Compliance has provided us with a framework to address these states, with targets for their improvement. It would be prudent to review the detail of these policies, remove irrelevancies and some over-burdening constraints which are known to bring little benefit, and repatriate them into legislation to ensure that improvements continue to be made.

Soil conservation should be given greater emphasis within environmental legislation where possible. Making soil and water resource protection practices a basic benchmark from which more complex environmental assurance scheme awards can be gained would be one option. Similarly, riparian boundaries should be awarded more protection, including ponds, due to their recognised high biodiversity value. Diffuse and point source pollution should be tackled through measures such as those being shown to be effective in landscape scale projects such as the Water Friendly Farming Project, as a basic practice benchmark to be gained prior to being able to apply for more complex environmental assurance scheme awards.

Incentivising Natural Resource Management

It is widely accepted that the environment was damaged by the agricultural intensification driven through CAP’s support of overproduction, but since then, much remedial work has been undertaken. Environment supporting schemes have been developed to their current form through several lessons learned exercises, for example there is now less focus on prescriptive actions and more focus on providing a whole support package to wildlife i.e. collaborative landscape scale habitat opportunity. Benefits are being seen and more time is needed in order to realise the full fruits of the labour, and more of the same effort is required to continue the uptrend.

Most farmers want to ensure that their land is kept in the best order possible including for nature but strains on income, volatile prices etc. have meant that many farmers cannot afford to do what they want to do, instead their focus is on breaking even to maintain their position. Natural Resource Management funding helps to bridge this gap for farmers.

Whilst the existing schemes are imperfect they do essentially contain the key options to improve biodiversity and the environment on agricultural land and in the countryside generally. We now need funding for the options which deliver the most, better and we need packages of measures which complement each other ecologically.

The flexibility for the farmer to build an application that is appropriate to the holding and local biodiversity priorities rather than to meet a certain £/ha is a strength of the current SMS approach that should continue to be pursued. The recent introduction of support for collaborative landscape scale initiatives potentially being led by farmers and landowners is ground-breaking and we would welcome continued support for this.

There should be in-built flexibility within future agri environmental schemes which allows farmers to use their professional judgement on many of the management matters, with advice from suitably qualified advisors. To be avoided are excessive regulations and inflexibility within the rules. Environmental schemes and direct payments should not just provide a financial incentive to landowners to participate but should actively encourage them to put together measures that they find personally enticing, or better still, working with others in a larger scale scheme.

The future support for Agri Environment needs to promote good habitat management practices therefore funding for maintenance of the best habitat not just the creation of new improved habitat. For many years farmers and landowners who dedicate much of their life to creating the best environmental benefit possible on their farms feel that historical schemes have rewarded those least inclined to do any conservation work which effectively rewards the initial poor management practices.

Conflict between rural tourism and biodiversity is becoming more recognised and widespread. For example, the impact of dogs on the nesting success of ground nesting birds is well known. We must continue to encourage rural tourism not only to support rural economies but to maintain education opportunities, raise the profile of the vulnerable species and habitats which need help and to fund conservation efforts. Future Natural Resource Management schemes could fund alternative routes or fencing to help relieve the pressure on vulnerable species and habitats and countryside and farming education opportunities could be subsidised through such schemes as it has done before. The success and uptake of the latter will depend on the removal of cost barriers to those attending, such as funding the transport to such rural facilities for schools.

The divergence in Natural Resource Management approaches, which has developed in the devolved administrations, should be continued and broadened where necessary, as they foster appropriate prioritisation and action within local areas. What is vital is that the practices which have been proven to benefit our common resources, habitats and species underpin the individual approaches and policies. The Environment (Wales) Act 2016 and Wellbeing of Future Generations (Wales) Act 2015 are current examples of this approach. Information sharing to ensure that each administration learns from each other is key. For example, in Wales the strict interpretation of the CAP rules on the density of trees on farmland has led to farmers being reluctant to plant trees or worse still remove them, whilst in England provided a farmer can demonstrate that he has trees planted in a grazed field, rather than livestock grazing in a wood, the land remains eligible.

The wording of agri-environmental schemes overall needs to be more motivating to farmers, to attract more participation. The current language is PR focussed, more geared towards helping the public understand the benefits to the environment than helping farmers to understand the added benefits to farm productivity and profitability.

We advocate future agri-environment funding should aim to increase the take-up of schemes, increase the extent and quality of the provision for biodiversity within farmland and encourage landscape-scale collaborations to improve habitat connectivity.

Education

The preceding paragraphs have detailed many examples of where the public should be re-engaged with particular topics in order to change perceptions, or to increase awareness and appreciation. This is an immediate priority for the government. With a rise in confidence in the industry we could expect to see more people choosing it as a career, which is needed to address the aging farming workforce. This injection of youth and innovative ideas is sorely needed, so making the industry more attractive is a top priority.

Similarly, many proposals have been put forward in this document for increasing the knowledge and understanding of the farming community and the advice and guidance offering from government. A more pro-active approach for the future is required and can be sought through formal education. Natural history curriculums should be expanded and farming and wildlife topics made mandatory, including external visits to farms. Natural History GCSE's and GCE's should be made widely available if not made mandatory.

Science Research and Innovation

We need both greater efficiency and innovation if we are to meet the demand for more food in the UK and remain competitive in an international market.

Recent innovations in agricultural production techniques have focussed upon technological advances. This means that the majority of new “techniques” are out of reach for most farmers who do not have large capital budgets to obtain the necessary equipment. A focus should be made upon advancing techniques and holistic approaches which are more attainable to everyday farmers. It is unlikely that industry will focus on this approach as the development of their own products is likely to be more profitable, although they are beginning to recognise the potential in backing environmentally supporting producers. Government should therefore ensure that the research gap, particularly in sustainable farming intensification, should become a top priority for funding.

Publishing agricultural and conservation research should not be about increasing academic prowess for the researcher but should be made widely available, in an easily understandable format, to those who are able to take the action suggested by its results. Farmers don't want to read complicated scientific papers they want to see the results for themselves. There are already in existence, organisations such as the (GWCT's) Allerton Project which aim to communicate such research through practical demonstration and more such organisations should be encouraged and funded. In addition, databases such as Agricology, which interpret scientific research into a more digestible format to farmers and landowners should be supported and promoted.

Regulation

The entire CAP regime has become over-burdened with checks and regulations which wastes valuable resources which could be put to better public good. More than half of the farmers polled prior to the referendum were in favour of leaving the EU despite being collectively the biggest beneficiary of EU directed money. We believe the reasons for this, and even among those who voted to stay, was based largely on their frustration at the complexity and minutia of the CAP rules. We are not advocating an “inspection free” regime after exit from the EU; we fully accept the public should have confidence that their money is being invested in wildlife and protecting the environment and those proven to deliberately make false claims should be subjected to appropriate fines.

The valuable biodiversity supporting practices of cross compliance could be enshrined within “earned recognition” schemes such as the LEAF Marque or accreditation through assurance schemes. This accreditation could then be a mandatory pre-requisite for stewardship funding. It is unlikely that farmers could afford to fund compliance without subsidy so this would encourage more participation in environmental stewardship, particularly if a flat payment rate to cover a farmers’ administration costs could be made as part of any additional stewardship funding. Small farmers have said that they have not joined accreditation schemes in the past as the cost of joining is the same for small farmers as it is for large and they can’t afford the fee. It is important that any earned recognition schemes do not incur excessive charges for farmer’s especially small farmers who will become disillusioned and resentful of what they may see as excessive cost for the benefit returned.

There are many private assurance schemes such as “Conservation Grade”, RSPCA Assured, LEAF and Red Tractor and significance of the assurance to the public is not always fully understood. It is thought that this is due to a combination of the confusing diversity of assurance schemes and the lack of promotion. The industry should attempt to streamline these schemes in order to raise the profile and improve understanding and appreciation. Once this is achieved, consumer demand could move the industry towards self-regulation, through preference for produce from an assured supplier. This approach should be underpinned by solid legislation placed upon the food industry to source their produce responsibly

To assist particularly small farmers, ALL regulation affecting them should be simplified, kept up to date and made easily accessible through one central advisory service including common additional regulations that would arise from common diversifications i.e. exporting etc. Marketing, costing and budgeting advice for farmers i.e. how to measure their costs of production and what to measure, should also be made available through the same source. This should include a benchmark so that farmers can compare their productivity and costs to others. All advice should be delivered by accredited advisors as for agronomists, who have the option of signposting the enquirer to more specialist advisors through other organisations if necessary and have good strong links to advisors local to the enquirer to help facilitate that handover.

Common elements of regulatory information gathered on line from farmers should be shared between central systems i.e. those which hold BPS data and those which hold agri environment scheme data. Much duplication still exists across systems and annual submissions in that the same data has to be entered each year rather than amended from an existing template. For example, a previous years’ submission could be carried forward as a template each year with each feature recorded as consistent, such as a riparian grassy buffer, or rotational such as a cover crop, and then changed updated annually as necessary.

All stakeholders in the sector including the consumer should be consulted when reviewing regulation to ensure that all needs are met but also that excessive or obstructive regulation that holds little benefit is eliminated. One such example is the energy efficiency regulations which are not suitable or attainable for rural properties and discourage investment.

Regulation should only be implemented where incentives, advice and information have failed to change behaviour. It should be science-led and reviewed regularly so to include most recent advances. Additionally, evidence suggests that farmer led stewardship schemes can deliver better outcomes than the more prescriptive, top-down approach.

GM

Development of genetically modified food would be welcomed and has the potential to be a significant factor in achieving our environmental improvement goals, such as reductions in the need

for inputs such as nutrients and pesticides. An initiative to better inform the public about the potential of such food is vital in order to reduce the suspicion of it.

Energy Crops

The funding of initiatives to produce energy crops has faced criticism due to failure to focus on the environmental impacts of such production. Energy crops grown on a commercial scale, as a monoculture are linked to poor environmental conditions, such as reduced biodiversity and poor soil health. Land capable of food production is to become an even more valuable asset with a rising world population to feed so depleting such a resource is not prudent. Such production should face restrictions or offsetting charges. Small scale energy generation from local vegetative waste however should be encouraged and supported to fuel local processing plants, or wood chip generation for local heating.

Risk

Legislation or regulation is often imposed because it is deemed prudent in the event of hazard. However, there is a distinction between hazard and risk.

‘A *hazard* is something that can cause harm, e.g. electricity, chemicals, working up a ladder, noise, a keyboard, a bully at work, stress, etc. A *risk* is the chance, high or low, that any *hazard* will actually cause somebody harm.’ In the context of farming, pesticides may be banned or their use curtailed because they represent a hazard whereas regulation should be based on risk.

For example, there is much about our habitat and species and their ability to thrive which is still unknown. It is only through testing out innovative approaches in practical pilots which can provide the answer to the best way to work with nature. More risk are necessary to be taken in order to move forward in developing better approaches to Natural Resource Management.

Another example, there are calls for the herbicide glyphosate to be banned because one study of many suggests it might be carcinogenic. This represents a potential hazard. The fact that the chemical has been used for many years without any apparent ill effects would indicate that the risk of harm is very low.

Mistakes have been made in the past, for example the licensing of thalidomide in 1956. The Silent Spring was a seminal book written by Rachel Carson and published in 1963 highlighting the harm caused by chemicals such as DDT. However, DDT represented a huge leap forward in pest management; with a very low Mammalian Toxicity its impact on operators was vastly lower than the previous pesticides employed which were based on inorganic heavy metals such as copper and mercury or organic products such as arsenic and nicotine. These products, particularly in the absence of adequate protective clothing, were extremely harmful to operators. Had DDT not been such a good insecticide and had alternative products been available then arguably its usage would not have led to resistance in pest species and widespread an excessive use. Current EU pesticide regulation fails to utilise comparative risk assessment approaches which leads to excessive reliance on individual active ingredients which leads to greater levels of environmental load and a much greater likelihood of the build-up of resistance.

Regulators tend to invoke the precautionary principle. If there is any doubt, then it is prudent to ban or control activity or products in case it may turn out to be harmful. That stifles innovation and can lead to reduced investment in research. As a consequence, there is interest growing, not least in Brussels, in the Innovation Principle. The Precautionary Principle (PP) considers the harm caused by taking an action that has unforeseen results whilst the Innovation Principle considers the cost of not taking action. Applying both principles should result in more balanced and proportionate regulation. Regulators are supposed to consider both with equal measure, but fail to do so under pressure from interest groups.

All innovations involve some element of risk, it is how these risks are managed and contained which is important. The PP is used to block innovation by those who are often opposed to a technology or for wider potential environmental concerns.

Post EU Funding

The regulatory mechanisms of CAP pillar I funding were designed to offer some basic protection of the environment. It is important to be aware that any wholesale withdrawal of Basic Payment Scheme “type” direct payments from farmers will remove an important compliance mechanism, beneficial to UK biodiversity, which currently requires limited policing.

Cross compliance environmental measures should be re-examined and the detailed rules on their management should be reviewed. Direct payments should be degressed over a period of time, a minimum of 5 years, in order to allow farmers to plan for the alternative and a small but inviting proportion retained to maintain this compliance mechanism.

We suggest that, as modulation has done part of in the past, the majority of funds be moved from direct payment to farmers and made available through Natural Resource Management schemes, without a reduction in the overall budget. This will release the resources sorely needed to fund the more complex and successful schemes which are vital for a thriving ecological network.

CAP Pillar I direct payments are currently determined by farm size with the largest farms receiving the most support. There is a perception that the smaller holdings are more in need of financial support whilst those of size should be able to use their own gains through economies of scale to offset their environmental impacts. Whether this be true or not, we believe that direct payment capping and a movement of resources from direct payments into the stewardship allocation would allow and encourage greater participation from landowners and the development of more ambitious biodiversity-boosting schemes with no need for increased over-all funding. It could also help to diminish the contentiousness of area-related payments. Funding should be targeted towards those who are actually responsible for the delivery of measures which promote biodiversity rather than the landowner, where these are separate.

If flood protection budgets in the UK are to be a separate entity, then the money should be accessible to farmers who undertake upper catchment mitigations to reduce downstream flooding. Provision of compensation to farmers in the lowlands who allow farmland to be flooded in times of need should be considered.

The rural development funding process can be cumbersome and over-administrative. It needs to be more flexible with greater eligibility; if it's good for the rural economy and community, it should be supported within reason.

There is value in small farms, in that they are often in the family for generations, have good links to the rural community as they have been part of it for so long, and can appreciate the local values of the landscape in a way that larger more commercial farms cannot. But they need support. More advice and support should be made available to help more groups of small farmers to establish co-operatives or collaborate so they are able to better negotiate with large industry and enjoy some economies of scale. This would also help to reduce the gap between farm gate and supermarket shelf prices due to inefficiencies in the supply chain, the costs of which are generally passed on the line to the producer.

One farmer has suggested that parish councils should receive devolved funds to administer and disseminate to farmers who create footpaths and bridleways. We support this and other concepts of the local community being involved in local decision making and local spending.

Welsh Government Consultation to inform the development of the Natural Resources Policy

Response from the North East Wales Biodiversity Network, February 2017

Date of issue: 14th November 2016

Biodiversity Network North East Wales - Background

The North East Wales Biodiversity Network was formed in October 2009 and renamed in 2010. It brought together local biodiversity partnerships that had existed in the Counties of Conwy, Denbighshire, Flintshire and Wrexham. It is made up of a number of organisations including Conwy, Denbighshire, Wrexham and Flintshire local authorities, Natural Resources Wales, North Wales Wildlife Trust, RSPB, Amphibian and Reptile Conservation, the North Wales trunk Road Agency, British association of shooting and conservation, Butterfly conservation, Chester Zoo, Clwyd Badger Group, Keep Wales Tidy, North East Wales Wildlife, The North Wales Environmental Record Centre: Cofnod and independent recorders and consultants. The broad aim of the network is to conserve, protect and enhance biodiversity for current and future generations. Coordination and collaboration are seen as being important to the partnership alongside other objectives that include raising awareness and the promotion of biodiversity and identifying local priorities to deliver local nature targets.

Key Points

- We agree broadly with the content of the document, however we feel the language throughout is vague and open to mis-interpretation. The document fails to set out clear policy direction and language is often ambiguous, particularly if this policy is going to inform the scale and content of Area Statements and implementation of the Nature Recovery Action Plan for Wales.
- The Natural Resource Policy will be a high level guidance document it therefore needs to emphasise the intrinsic value of biodiversity in line with Welsh Government's international commitments under the Convention on Biological Diversity (CBD)¹, the ambition and objectives in the Nature Recovery Action Plan for Wales and within the objective of sustainable management of natural resources and in particular the application of its principles².
- With the exception of the section referring to the Biodiversity and Resilience of Ecosystems Duty there is very little reference to biodiversity or nature conservation. There is no direct reference to International targets in the document which seeks to halt the loss of biodiversity and the degradation of ecosystem services by 2020, and restore

¹ Convention on Biological Diversity Aichi targets <https://www.cbd.int/sp/targets/>

² Environment (Wales) Act, 2016 – Section 3 SMNR and Section 4 Principles of SMNR

them as much as is possible. This has been discussed in previous consultation comments and is covered thoroughly in the Nature Recovery Action Plan for Wales.

- The document would benefit from a definitions/glossary which should collate precise definitions for terms including natural resources/Sustainable Management of Natural Resources/Nature.
- The State of Natural Resources Report (SoNaRR) should provide the evidence base to inform the NRP. It is not clear how the findings of SoNaRR have helped identify priorities in the consultation document.
- It is essential that the NRP accurately reflects the evidence from SoNaRR.
- Although the content in the three themes can generally be viewed as positive there are numerous opportunities for conflict with nature conservation and SMNR. For biodiversity in Wales to be maintained and enhanced there needs to be an overarching nature conservation aim which is prioritised throughout the document. There are minimal references to intrinsic biodiversity value, maintenance and enhancing ecosystems and halting and reversing biodiversity loss.
- The document would benefit by setting out a clear timeline showing the evolution of the Living Wales agenda from the first consultation in 2010 through to the creation of the Environment Act and Nature Recovery Action Plan for Wales, which are now the focus of implementation, referencing the link to the international targets.
- An overview of how the raft of new legislation and policy fit together is needed. This should build on the diagrams in the delivery framework section to set out where the Natural Resources Policy Statement fits in and how the Natural Resources Policy will help to deliver and inform the objectives of the Nature Recovery Action Plan, Area statements and other Welsh Government (WG) departmental policies such as Marine, Agricultural and Forestry policies. We would reiterate our point from the previous environmental consultations that conformity across Welsh Government departments, the processes and how they relate to wider policy and enable change is key to the success of the Sustainable Management of Natural Resources (SMNR) approach.
- It is important that the document provides information on how WG will deliver on the content of the consultation document, embed the principles throughout their functions and lead by example.
- There are numerous references to Welsh Ministers' policy / priorities throughout the document. A definition should be provided in the document glossary clarifying that this represents the WG policies and priorities.

Theme 1: Accelerating green growth by increasing resource efficiency, renewable energy and supporting innovation.

We are in support of green growth but would seek clarification how the socio-economic and environmental needs will be truly integrated and prioritised ensuring that environmental needs are met and the resilience of ecosystems maintained and enhanced. In the past the socio-economic priorities have resulted in the environment losing out – the new approach much emphasize this will not be allowed to continue to happen. There is no place for business as usual - biodiversity /nature recovery should be highlighted as a fundamental aim in the NR Policy.

It is important to note that there is the possibility of conflict between theme one and nature conservation, for example re-newable energy provision or tourism and biodiversity. Often re-newable energy sites are opportunistic and can result in the loss of valuable wildlife habitat, a wales wide strategic re-newable energy plan could provide criteria which would guide where re-newable energy sites are located ensuring that green growth does not impact on the quantity and quality of biodiversity.

Theme 2: Delivering nature-based solutions to improve resilience and the benefits derived from natural resources.

We support using nature based solutions to improve resilience however like theme one there is a risk of conflict between delivering nature based solutions and nature conservation. There are also barriers preventing a number of beneficial nature based solutions being adopted, these include:

Policy issues with regard to Sustainable Urban drainage Systems (SUDS) water treatment systems: There are issues with discharge rates and the long term maintenance requirements of SUDS systems. WG need to resolve the policy issues regarding adoption of drainage systems in order for it to become a requirement on all new developments.

Compensation issues with regard to natural flood management and carbon sequestration: At present there are no incentives for landowners to plant the right tree species in appropriate locations or allow higher catchment water retention on their land. The planting of native tree species would deliver nature based solutions for climate change, flooding and habitat fragmentation “the right tree in the right place”. But at present these actions may result in loss of payments and reduction of what is seen as more productive agricultural land.

We welcome green architecture and are keen to promote it along with maximising the biodiversity opportunities within the structure of new builds but often additional capital costs and concerns regarding future management of green architecture are a deterrent to developers. Case studies detailing costs and maintenance requirements to address these concerns may assist in increased adoption of such architecture. There are also opportunities to improve the ecological value of some green architecture systems for example use of more pollinator friendly species with advice notes.

Community based allotments can be hugely successful but it's worth highlighting that they are often not particularly environmentally friendly with an abundance of pesticide and herbicide

application. Community allotments should be promoted along with the benefits of organic food production. There are successful examples of organic community allotments in Wales.

Additional mechanisms are required to address land out of our control where there is often no incentive to work towards biodiversity gain in fact there are some cases where landowners are incentivised to have adverse impacts on biodiversity.

Theme 3: Improving community and individual wellbeing by taking a place and landscape based approach

Landscape based projects such as Wildlife Trusts' Living Landscapes and RSPB's Futurescapes landscape initiatives are made possible through partnership working and often complex and challenging funding bid processes. Many projects have also involved EU money, e.g. LIFE, ERDF, RDP. Especially in the context of Brexit what resources will enable such large scale projects across the whole of Wales in the future? We expect a clear description of Welsh Government policy in relation to how these types of projects and other Nature Recovery Action Plan interventions will be facilitated. The NR Policy must outline what it intends to do in relation to biodiversity as required under the Environment Act section 9 (2) – making clear how WG will enable such work to take place is critical.

Bionet works at a regional and local level with communities and individuals across North East Wales, we have a strong partnership with good local knowledge and contacts and link work into key national plans such as the Action Plan for Pollinators. This is essential in delivery of conservation actions, particularly those within the Nature Recovery Action Plan.

Barriers

- Insufficient data can cause barriers to effective nature conservation and SMNR. In addition opportunities for use of data are not always explored fully due to resource and capacity limitations.
- The ongoing management of SSSI and Wildlife sites, management of these sites is integral to maintaining and enhancing biodiversity. With a large proportion of nationally protected sites in unfavourable condition if this long term management is not improved it will form a barrier to SMNR.
- 80% of our land in Wales is under agricultural management, if more sustainable farming methods are not adopted it will form a barrier to nature conservation and SMNR
- Availability of grant funding, Bionet members are continually implementing partnership projects which rely on grant funding, these projects deliver huge benefits with limited resources and provide excellent value for money. A lack of sufficient funding will form a barrier to nature conservation work.

Key Steps

We would propose WG makes commitments to the following:

- The use of Local Environmental Record Centres to not just collect records but to collate and interpret data sets: An example in North East Wales is the collation of the significant

Great Crested Newt monitoring data set. This enables knowledge of species status/range to inform land management and sustainable green growth.

- Ongoing funding mechanisms (such as SMS under RDP and a replacement for LIFE post-Brexit)
- Funding and facilitating a governance framework embedding the Nature Recovery Action Plan into public authorities to help deliver Nature Recovery objectives and the s.6 biodiversity and ecosystems duty.
- Build or continue capacity within public bodies to implement the ecosystem duty i.e. staff within local authorities and beyond e.g. housing associations
- National Policy to improve local sustainable green growth e.g. a renewable energy plan to avoid valuable ecological habitats being lost, address issues with SUDS systems to facilitate adoption.

Consultation Response Form

Your name: Rebecca Sharp

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Question: Written feedback on the priority themes and key objectives within them outlined in this document would be welcome as part of this consultation exercise. In particular, taking into account the legal framework and its requirements as outlined in this document, it would be helpful to receive contributions on:

- the key steps that need to be taken in order to deliver on the priority themes and address the key challenges; and,
- the barriers that need to be addressed.

If you have any related issues which we have not specifically addressed, please use this space to report them:

The Natural Resource Policy Priority Themes - General Comments

Section 3 of the consultation document refers to drawing on the previous NRP statement and the programme for Government 'Taking Wales Forward' to identify the 3 priority themes. It is therefore unclear how the State of Natural Resources Report (SoNaRR) has informed the choice of the themes. As the legal framework suggests that SoNaRR and the Nature Recovery Plan feed into the NNR policy, further narrative in the final policy document would be helpful to clarify how the priorities identified have taken account of these documents and evidence. It is also unclear how the biodiversity duty has been integrated into the selection of the priority themes. The section on the biodiversity and resilience of ecosystems duty appears separate to the remaining document and there is little reference to this duty within each theme. As embedding biodiversity into decision making is a key element of the biodiversity duty, it's expected that there would be clear integration of the duty into the themes. The Authority would recommend that further integration of this duty be considered as part of the final policy.

The proposed priority themes appear to be rather broad and encompass various and possibly conflicting disciplines and delivery mechanisms, which may be difficult to deliver effectively. The Authority would wish to see the policy set out clear direction in the final iteration and tackle the potential conflicts to ensure a route of delivery is achievable.

Priority Theme 1: Accelerating green growth by increasing resource efficiency, renewable energy and supporting innovation.

Whilst the Authority would be supportive of this theme in principle, it is unclear how this relates to the evidence and recommendations set out in SoNaRR. Further discussion linking this theme to the evidence presented in SoNaRR would be beneficial in the future policy.

This theme appears to focus upon the economic drivers rather than specifically addressing evidenced issues set out in SoNaRR. It is unclear how this theme fits within the legal process set out, and how the biodiversity duty will be addressed. We would suggest that further narrative in the final policy would be helpful.

The proposed measures to support green growth appear to be limited to existing approaches (resource efficiency, more renewable energy projects, developing new markets) without taking the opportunity to introduce any new or additional provisions or to strengthen the overall policy emphasis. In order to influence the planning approach or for the planning system to support the new policy, it might be more effective to introduce new initiatives which could feed through to changes to planning legislation and guidance.

Renewable Energy

In particular reference to renewable energy, it should be recognised that renewable energy schemes may not always be 'green energy' sources, for example wind farms on peat bogs can have significant biodiversity and carbon emission impacts. We would recommend that any support given to renewable energy takes into account the impacts of such schemes on our environment, nature and landscape. The NRP could take the opportunity to promote but refine support to such development to make sure such development is sited in the correct place, putting the protection and conservation of our natural resources, including landscape, carbon and biodiversity at the heart of decision-making. For example, any refinement of TAN 8 could ensure that biodiversity is further integrated into the decision making process.

Consideration could be given to requiring all new builds to be built with solar panels, or other small-scale renewables. In theory, the cost borne by the house builders for this installation could be passed onto the home-buyers, who could recoup costs from energy bill savings. If this was required as standard this could potentially result in driving down the cost of householder renewable energy equipment and installation, allowing such to be more affordable for home owners and to enable retro-fitting. Using market drivers to reduce costs rather than subsidising may be a longer term and more sustainable option to encouraging a behaviour change in energy efficiency, but a strong policy trigger, which feeds into the planning system, may be necessary to start this

process. As stated above, take up of renewables within new builds has been limited at a local level to date, so a stronger lead from WG appears to be necessary for this to be realised and to become the norm.

Energy-efficiency for existing households is currently looked at via a piece-meal approach, with different funding pots for different elements, consideration could be made to looking at this on a whole-house basis to ensure the most appropriate and sustainable measures are applied and funded.

Priority Theme 2: Delivering nature-based solutions to improve resilience and the benefits derived from natural resources.

Nature-based Solutions

The way existing communities are laid out, especially in the valleys or central areas of towns, have left little space to retrofit nature-based solutions such as green infrastructure or SUDs, however many of these areas are particularly susceptible to issues such as flooding. New developments can build these types of green infrastructure options into layouts, although take up to date has been limited. Innovative green infrastructure techniques, for example those being retro-fitted in New York (see NYC Green Infrastructure Plan), could be considered in some high risk situations where funding was available to investigate such options. Otherwise, particularly in relation to flooding, upstream and upland natural flood management could be a more achievable option. However, these measures are heavily reliant upon landowner engagement to deliver options such as ponds, restoration of peat bog, and allowing over land diffuse flow etc, delivery of which may need some sort of incentive for landowners. The work undertaken by Coed Cymru through the Nature Fund and Sustainable Management Scheme provides one example of how this could be achieved, and further collaboration between flood risk managers in Local Authorities, Natural Resource Wales and Landowners, with appropriate funding mechanisms, would be needed.

The restoration of peat bogs and general upland ecosystems should be identified as a further solution to this priority. Such restoration provides options for reducing flood risk, improving water quality, improving carbon sequestration, soil management and biodiversity. Traditionally some of the land uses in our uplands, such as agriculture or forestry, have exasperated or even caused problems downstream. Upland restorations to reinstate functioning ecosystems will most likely need to be incentivised for landowners (particularly farmers) and the WG forestry estate may need to reconsider their approach to woodland cover to enable such restoration. Whilst woodland is an important ecosystem in its own right, some forestry plantations are actually causing damage both to the upland ecosystem and to downstream habitats and communities. Current woodland policy and legislation doesn't allow a reduction in the forestry cover, rather a push to increase it, therefore consideration to revisiting such policy and legislation may be needed. Further detailed consideration of placement of woodland or forestry cover is recommended to ensure our natural resources and ecosystems services are appropriately conserved. Greater ecosystem benefits may be realised via a mosaic of habitats rather than intensive forest cover.

Nature-based solutions of the types listed have been discussed for many years but there appears to be a relatively slow adoption of such measures in general. More could be done to facilitate the multiple use of retained natural spaces (combining drainage, biodiversity/ecology, open space, corridor functions etc.). Barriers to this include ownership and maintenance issues, health and safety concerns and funding issues. While some funding can be sourced through planning obligations, the implications for development viability are significant and other funding mechanisms need to be considered and addressed.

For uptake of these nature-based techniques to increase they need to be considered as a standard requirement that are expected to be applied in preference to traditional infrastructure, this will take time to realise and may need some sort of driver for change, be it through policy, TANs or via funding criteria. The use of BREEAM may also be of help to embed these approaches into construction.

Parks, Reserves and Open Space

Parks and Local Nature Reserves are important resources for local communities but funding available to maintain them is ever reducing. Whilst some management can be undertaken by volunteers, staff resources, equipment and expertise is still needed to guide such effort if our local parks and reserves are to continue to provide the benefits mentioned and be safe places for residents and visitors to use. Similarly, any natural space that is accessible to the public requires a certain level of maintenance, for which resources are ever diminishing.

Priority Theme 3: Improving community and individual well-being by taking a place and landscape based approach.

This theme seems to be quite large and all-encompassing of the issues and opportunities identified in the SoNaRR; it may be clearer / more productive to sub-divide this theme further, for example: 'improving community and individual well-being through education' and 'taking a place and landscape based approach'. This would give a greater opportunity to address the issue of the needed cultural and attitude changes through educational opportunities.

RDP and Funding

The RDP LEADER (revenue projects) and Rural Community Development Fund (capital projects) currently contribute towards the delivery of the approach set out for this theme. The crucial element to both of these schemes is that local communities are invited to have substantial influence into how the funding is spent in order to ensure that community needs are met. The £2.1m of LEADER funding awarded to Neath Port Talbot can fund feasibility studies into various approaches of land management, community renewable energy schemes, walking and cycling trails and tourism infrastructure. This funding is already proving incredibly useful in establishing best-practise examples for making best use of our natural resources, yet there are many more avenues still to be explored.

RCDF funding applications have been submitted for renewable energy projects, and for tourism infrastructure and both will take advantage of the rural landscapes in Neath Port Talbot. There is much more scope for different projects too, with fairly broad priority areas put in place by WG. There is still £57m worth of projects to be implemented under this scheme across Wales.

As an Authority we have proven that we can successfully run Programmes of this nature and we are ready to continue this post-Brexit, provided adequate resources are made available. This could form a key delivery mechanism for natural resource policy and the nature recovery plan. However, in light of the Brexit vote, there is great uncertainty over the future of RDP funding post 2020. RDP is currently funded jointly through the EU and Welsh Government, yet after 2020, European resources will no longer be available which could greatly diminish any subsequent Programme which may occur in the years after. A lot depends on the UK Government's willingness to continue to fund similar schemes, but this will not become apparent until after Brexit negotiations have occurred.

In addition, currently RDP programmes are restricted to the 24 rural wards of Neath Port Talbot and this can restrict the positive outcomes of RDP. Brexit offers the chance to re-evaluate how these Programmes are run and moving forward there should be more integration with other Welsh Government schemes with less stringent rurality rules to ensure a joined up approach, and increased opportunities for positive and sustainable project outcomes by building on stronger relationships between our urban and rural communities.

Ecosystem services - Tourism

It is recognised that our natural resources are key for tourism. In NPT, Afan Forest, Margam Park and our coastline at Aberavon are all particularly important for tourism in NPT. Maintaining the 'naturalness' of these areas and making sympathetic improvements to facilities will be important in the future. With ongoing declines in funds this is going to become more difficult to deliver. Suitable funding streams to develop such ecosystems services will be important to ensure such services can be realised.

Ecosystem Services - Payments

From lessons learnt on the Biodiversity Compensation Scheme in NPT we would strongly recommend to WG that potential delivery mechanisms will need to ensure that payment for ecosystem services actually realises the required ecosystem improvement, rather than banking funds and providing a mechanism for responsibilities to address significant environmental or ecosystem impacts to be 'offloaded'. Through the compensation scheme being developed in NPT we have researched how habitat and species losses to development could be compensated for. It has become clear that the offsetting approach being developed largely in England is unlikely to be workable in NPT and possibly in a Welsh context, as we don't have the extent of available land that would be needed to deliver the required offsets. Alternative delivery mechanisms and innovative approaches to ensure we do not continue to see declines in our habitat and species and the ecosystem benefits they provide will be needed, for example use of sites that provide multiple-benefits, use of vertical spaces such as walls and roofs, mechanisms that pool resources to deliver a more sustainable and substantial compensation

Landscape Scale Approach

It is agreed that the scale at which we work needs to be relevant to the resource and type of action we are delivering. The approach to landscape-scale restoration has been recognised for some time to address habitat and species decline, and a number of projects have taken place at this scale. However, whilst it may be possible to bring together the funding, expertise or partnership working that is needed, it is often the landownership and land management constraints that restrict further landscape-scale projects being taken forward. Where there are multiple landowners, absentee landowners or large numbers of commoners, all with differing interest on the land, it requires significant time to establish a workable partnership to deliver at such a scale, particularly where there are conflicting priorities. The existing Local Biodiversity Action Plan partnerships are an excellent resource to draw upon for the necessary partnerships needed to deliver landscape scale projects. They already have members of suitable partner organisations signed up to deliver the work for such projects, they just need landowners to get on board, be it private farmers, WG forestry estate, Welsh Water, minerals operators, wind farm operators.

Reconciling all the different priorities will however continue to be a barrier to such work. Along with State Aid Rules, that have been restrictive to some projects in the past, conflicts with existing farming, forestry and urban development will need to be overcome. For example, policy may require the maintenance of woodland/forestry cover, whilst farming may wish to be more productive than is compatible with the habitat restoration objective; and urban development and industry may have pressing economic and employment issues that are prioritised. The complexities to delivery on a landscape scale in Wales, particularly in the valley and urban areas, will require significant resources to overcome.

A landscape scale approach will be helpful to address declines for many species, however the ecology of habitats and specific species are in danger of being misrepresented by a broad brush approach and the key drivers behind the declines could potentially be forgotten. A better-connected and larger scale approach may certainly deliver a significant amount towards reversing the decline of many habitats and species but we will continue to need targeted conservation action for certain habitats and species. Some habitats and species are so restricted in their ecology that very specific action may be required to ensure that they are not lost from the Welsh fauna and flora.

Future agriculture and forestry policy will be key to the delivery of a landscape based approach, which may require alignment with the approaches set out in this theme. In addition, the planning system can play a fundamental role in the protection and enhancement of landscape scale ecological and associated networks, through protective policies and funding opportunities through planning obligations etc. (although it is acknowledged that viability may be an issue) This wider place and landscape approach needs to feed into, and underpin, planning decisions in relation to landscape designations (including local designations such as green wedges and special landscape areas) and development allocations etc.

Woodland Cover

See previous comments on woodland and uplands under theme 2.

Networks and corridors of green spaces

Funding and resources are a universal issue for delivery e.g. managing verges for pollinators may actually require additional costs not normally borne by an Authority, e.g. for different machinery, or requirements to dispose of arisings, or cost of seed.

In relation to the reference made to a good public path network it should be noted that these (public rights of way) do not have verges in the same way as some highways do, and there is no legal control to manage any habitats adjacent to such PROWs, rather to ensure the routes are usable. To improve the verges/hedges next to such paths would require working with and incentivising landowners.

Health and well-being

The section in this theme about improving community and individual well-being and health improvements could be built upon along with education opportunities. We would welcome further information and direction on such issues, for example opportunities for organisations to work together on green prescribing. The lessons learnt and good practice developed under projects such as Coed Lleol/Small Woods' Actif Woods Project could be built on for this element of the policy theme.

Key Challenges

- Carbon – In relation to sequestration of carbon we would suggest considering other habitats, not just peatland and woodland, as habitats that may help sequester carbon and contribute towards tackling climate change. It is however, considered logical to prioritise upland restoration particularly to ensure the Welsh peatland resource is restored to a functioning and carbon sequestering ecosystem; thereby providing these carbon benefits.
- Productive capacity – Invasive non-native species are a widespread problem and we would suggest that this issue needs a strategic and funded approach. Piecemeal and ad hoc treatment programmes are not considered effective, particularly in the long-term. Local authorities do not have the necessary funds to tackle this alone.
- Flooding – SUDs and nature-based solutions including green infrastructure may be useful in tackling this issue. See comments for theme 1.
- Health and equity- green prescribing, green infrastructure and green space management and urban trees may all contribute to addressing this challenge. Costs of the latter two could however be prohibitive. See comments under theme 3.
- Water – Projects such as minewater treatment through reedbeds has been recognised and proven successful for many years. Nature-based solutions may be helpful to reduce water quality problems.
- Quality and connectivity of habitats – The quality and connectivity of habitats may be tackled through a landscape scale approach, supplemented with targeted action, along with better links and incentives for landowners/land managers. However, to achieve this, a behaviour/cultural change will be needed to ensure that the value of our natural resources, including habitats and species, are recognised, and considered to have as much weight as economic factors in our decision making. See comments for theme 3.
- Distinctiveness – This may largely be tackled by ensuring development is targeted to 'the right place' taking account of our natural resources. The planning process will be key to overcome this challenge. See comments for theme 1.

We would also recommend that air quality/pollution and carbon emissions; noise and light pollution; and cultural or behaviour change towards valuing natural resources be included as key challenges.

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here:

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To: NaturalResourceManagement@wales.gsi.gov.uk
Cc: [.gov.uk](mailto:NaturalResourceManagement@wales.gsi.gov.uk)

Your Ref:
Our Ref:

From:
Location:

Date: February 2017

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NFU Cymru Response – Welsh Government Consultation to inform the development of the Natural Resources Policy

Introduction

NFU Cymru welcomes the opportunity to respond to the Welsh Government Consultation to inform the development of the Natural Resources Policy. We have also been pleased to attend and contribute to a number roundtable discussions and workshops on Natural Resources Policy in recent months.

NFU Cymru champions Welsh farming and represents farmers throughout Wales and across all sectors. Our vision is for a productive, profitable and progressive Welsh agricultural industry and our aim is to establish the background conditions in which farm businesses can be profitable and develop.

The importance of the farming industry in rural Wales cannot be over-stated. Welsh farming businesses are the backbone of the Welsh rural economy, the axis around which rural communities turn. The raw ingredients that we produce form the cornerstone of the multi million pound Welsh food and drink industry which is Wales' largest employer employing over 222,400 people. We are part of a UK food and drink industry worth £108bn to the economy.

Welsh farmers also play a key role maintaining and enhancing our natural environment – Wales' key asset. Farming activity across over 80% of the land area of Wales supports a diverse range of species, habitats and ecosystems; provides a range of ecosystem services including flood alleviation, carbon sequestration, climate change mitigation; and delivers the spectacular backdrop for Wales' tourism and recreation sector worth an estimated £2.5bn annually.

Overall Welsh farming makes a unique and unparalleled contribution to the economic, environmental, social and cultural well-being of Wales. The contribution of the sector to the Well-Being of Future Generations Act and the seven well-being goals is summarised in Annex 1 for information.

Our response to this consultation has been informed by extensive consultation with our members and includes member feedback to our consultation '*NFU Cymru options paper to shape Welsh farming's future post-Brexit*' – one of the largest consultations in the history of the Union - which took place during autumn 2016 and included our next generation farmers. The consultation informed the development of the NFU Cymru Brexit Policy Statement which was considered and agreed at the NFU Cymru Council on 7th February 2017.

The NFU Cymru Brexit Policy Statement is attached in Annex 2 and provides information on our position with respect to trade, a domestic agricultural policy, regulation, science and technology and access to labour post Brexit.

Summary response

- NFU Cymru notes the Natural Resources Policy will be an important step in moving the Environment (Wales) Act 2016 from concept to delivery phase.
- In our discussions with our members, it is clear that the new Environment (Wales) Act 2016 and the legislative framework is not at all clear and well understood. This presents a challenge and barrier to both the development and delivery of a 'fit for purpose' Natural Resources Policy and domestic agricultural policy, which we understand, will be informed by the Natural Resources Policy.
- With over 80% of the land area of Wales farmed, agricultural is by far Wales' largest land use activity. Farmers actively manage much of the Welsh environment on a day-to-day basis, farming activity also underpins the delivery of many other economic, environmental, social and cultural goods and services. Farmers will, therefore, be instrumental and should be viewed as key delivery partners for Natural Resources Policy implementation.
- The Natural Resources Policy must be flexible and adaptable. It should be developed in the context of the profound uncertainty brought about by the decision to withdraw from the EU. The Natural Resources Policy should also reflect the future challenges to our global food production system.
- NFU Cymru would emphasise the positive contribution that farmers have made to protecting and enhancing the condition of our environment over many years. There is more that can be done and farmers recognise the pivotal role that have to play in the years ahead contributing to further environmental improvements, maintaining and enhancing our treasured Welsh landscape, delivering the multiple benefits that society seeks alongside their core food production role.
- A number of mechanisms such as SMS and PES identified within the roundtable discussion paper have a clear role to play in the future delivery of the Natural Resources Policy. However, these mechanisms cannot be considered as a comprehensive replacement to the Common Agricultural Policy which has a broader suite of economic, social and cultural goals - including ensuring consumers have access to food that is affordable, safe and produced to high animal welfare, food quality and environmental standards - that remain highly relevant to Wales.
- We are pleased that Welsh Government has identified through its White Paper, the importance of protecting rural interests and the call for the UK Government to make equivalent or greater resources available to support farming in Wales.
- NFU Cymru does not believe that the environment and the sustainable management of natural resources should be the sole driver of future domestic agricultural policy. The future domestic agricultural policy should be viewed as a key mechanism for the delivery of Natural Resources Policy alongside broader economic, social and cultural objectives and the unparalleled contribution of farming to the seven Well-Being Goals.
- Consultation with our members has demonstrated support for a domestic agricultural policy that comprises a suite of instruments and elements aimed at the delivery of a range of public goods and outcomes that society seeks. The future domestic agricultural policy should be transparent and have clarity of purpose for both the public and farmers and a transitional period must be factored in to manage change from current arrangements. It should also be outcome focussed with progress charted to demonstrate how the industry is continuing to contribute to the Well-Being goals established in the Well-Being of Future Generations Act.
- Moving forward, there is a need for appropriate governance around the development and implementation of the Natural Resources Policy, how this influences the domestic agricultural policy and is translated into the area statements.

Context for Natural Resources Policy in Wales

NFU Cymru recognises the entirely new legislative framework for the sustainable management of natural resources established via the Environment (Wales) Act 2016. In addition, we note the Well-Being of Future Generations (Wales) Act 2015 places a duty on all public bodies to protect and enhance the economic, environmental, social and cultural well-being of Wales.

The Natural Resources Policy will be an important step in moving the Environment Act from concept to delivery by establishing the Welsh Ministers' policies for contributing towards the sustainable management of natural resources; also setting out the risks, opportunities and priorities for action.

With over 80% of the land area of Wales farmed, agriculture is, by far, the largest land-use activity. As such the views put forward within this response should be adequately 'weighted' to reflect the fact that it is farmers who actively manage much of the Welsh environment on a day-to-day basis. Farming activity also underpins the delivery of many other economic, environmental, social and cultural 'goods and services'. Going forward, the farmers will be a significant 'delivery partner' for Natural Resources Policy implementation.

Natural Resources Policy must be developed in the context of profound uncertainty brought about by the decision to withdraw from the EU. For agriculture this has resulted in uncertainty in terms of the future of CAP, future trading arrangements and also in the area of environmental regulation. Government is about to embark on a period of negotiations to decide the terms of our withdrawal and the outcome cannot be predicted at this stage. By necessity the Natural Resources Policy must, therefore, retain an element of flexibility and adaptability.

NFU Cymru has welcomed the positive acknowledgement of the role agriculture plays for Wales in the Welsh Government's Securing Wales' Future White Paper, published recently. This paper highlights the importance of protecting rural interests as Wales works towards a future outside of the EU. The paper accurately documents the unique challenges faced by those working in the Welsh agricultural industry and acknowledges the damage that any significant reduction in access to the Single Market will cause. NFU Cymru is pleased to see the call, within the White Paper, for the UK Government to make equivalent or greater resources available to support farming in Wales.

We highlight that around 80% of Welsh farms are not viable without the £274m share of CAP support they receive each year. Brexit now presents us with an historic opportunity to replace the Common Agricultural Policy with a policy and measures that are better suited to Welsh farmers and aligned with Welsh taxpayer and consumer expectations and wishes.

The Natural Resources Policy must also recognise global challenges. Climate change, population growth and diminishing natural resources all pose significant threats to our global food production systems and have brought the importance of maintaining sustainable agricultural production within Wales into increasing focus. The reality is that, globally, there are not significant areas of additional land that can be brought into agricultural production and, as a result of the increasing impact of climate change, agricultural production is likely to be increasingly challenging in many parts of the world.

Wales is predicted to be an area naturally favoured for agricultural production in the future given its predicted climate and rainfall. Going forward it will be even more important for farmers to manage the natural environment in a sustainable way which seeks to find a workable balance between the demands of food security, water share and availability, climate change mitigation, biodiversity and wildlife protection, flood risk management, water quality and farm business viability.

In summary, Welsh farmers will be crucial partners in the delivery of future Natural Resources Policy. Whilst we recognise the ambition of the Environment (Wales) Act 2016 and the Natural Resources Policy, we also recognise that predicting the future will be very difficult, in the context of Brexit and the global challenges set out above.

The Natural Resources Policy and the delivery of its actions, therefore, cannot be considered independently of a range of other factors. Policy formulation will require understanding and careful balancing of environmental, economic, social and cultural factors.

Agriculture and the natural environment

Farmers have an inherent interest in maintaining and enhancing the quality and condition of our environment – they are dependent on the land for their living after all. It is also important to recognise that the Welsh countryside is not natural *per se*, it is very much a managed landscape – the result of centuries of farming and other human activity. Without sustainable agriculture, the Welsh countryside and many features of its unique landscape would not be maintained.

NFU Cymru believes Welsh farmers have an extremely positive story to tell with regards our natural environment, resources and the crucial role they play in maintaining and enhancing our rich and varied countryside alongside their core food production role. Following the publication of the State of Natural Resources Report (SoNaRR) in October 2016, NFU Cymru took the opportunity to highlight some of the significant good work that has been undertaken in Wales over many years to protect and enhance the condition of our environment. At the time of publication, NFU Cymru expressed disappointment that the SoNaRR report understated the significant contribution that farming makes to the economic, environmental, social and cultural well-being of Wales. For example, no recognition was given to the fact that the value of the wildlife and outdoor activity is underpinned by the Welsh landscape and countryside which is delivered and maintained, on the whole, by farmers. The Report also included a number of negative assertions that do not correlate with farming in Wales today.

We were surprised that NRW did not include information on a number of positive trends emerging from the Glastir Monitoring and Evaluation Programme (GMEP) - one of the most comprehensive monitoring programmes of agri-environment schemes anywhere in Europe. These include:

- Stable overall plant species richness in woodland habitat but evidence of a decline in arable, improved and habitat land up until 2007 when it appears to have stabilised
- Recent stability for upland farmland birds and an increase in woodland bird species
- No further decline over the last 10 years in specialist butterfly species
- General ongoing improvement in the condition of small streams since 1990 based on macro-invertebrate communities with 80% of streams surveyed through GMEP in good or high ecological condition
- A significant trend for increasing area of woodland over the last 15 years.
- An increase in woodland bird indicators
- Land use, land use change and forestry in Wales has changed from a small GHG source to a sink between 1990 and 2013 as a result of increased carbon storage in vegetation and soils
- Reductions in nitrogen fertilizer consumption across Wales by approximate 45% between 1990 and 2013
- A significant decline in available phosphorus for improved land providing benefits for freshwaters
- The 30 year record of topsoil carbon indicates no decline and there is ongoing recovery of soil acidity – both are positive outcomes.

We acknowledge, of course, there is much more that can be done and farmers in Wales recognise the role they have to play in the years ahead contributing to further environmental improvements and delivering the multiple benefits that society seeks alongside the production of safe, high quality,

affordable food. Throughout the consultation our members have demonstrated their willingness to play their part. Farmers are also increasingly aware of the wider set of goods and services they provide and are receptive to exploring a broader set of market opportunities than those currently rewarded through conventional commodity markets.

Whilst Welsh farmers are ready to embrace future opportunities presented in the Natural Resources Policy, it is also important to recognise that many of the schemes and mechanisms that facilitate the delivery of environmental management and enhancement in Wales currently face an uncertain future post Brexit. In addition, public funding for the management of designated sites through Section 15 Agreements is also declining. NFU Cymru would emphasise that Welsh Government, through the Natural Resources Policy should appreciate the risks and opportunities associated with this.

Agriculture and Natural Resources Policy

NFU Cymru notes the three priority themes identified within the consultation for the Natural Resources Policy to realise the significant opportunities and address the challenges ahead:

- Accelerating green growth by increasing resource efficiency, renewable energy and supporting innovation
- Delivering nature-based solutions to improve resilience and the benefits derived from natural resources
- Improving community and individual well-being by taking a place and landscape based approach

In discussions with our members as part of this consultation process, it has become clear that the new Environment (Wales) Act 2016 and accompanying legislative framework comes with a completely new language and vocabulary. Thus far, our experience of the Act is that the new legislation appears process-driven as opposed to outcome-focussed. We would highlight that the new Act, and what it means in practice, is not at all understood by farmers. We stress the consultation is a long way off the clear thinking required to inform the development of the most important policy for Welsh agriculture in a generation.

The consultation provides limited information and clarity on how Natural Resources Management will work in practice. Given the apparent significance of this consultation we express concern that Natural Resources Policy has been neither described nor communicated appropriately to engage a good level of interest and interaction with our members.

In our view, this represents a significant challenge and barrier to the development of a 'fit-for-purpose' Natural Resources Policy. As we move from the concept to the implementation phase, we emphasise the delivery of environmental action on the ground is highly reliant on farmers understanding what the objective of such action is and being prepared to participate in such activities. We emphasise that a partnership approach with the farming industry will be pivotal to securing the best outcomes.

The discourse around the Natural Resources Policy has, however, developed and advanced during the consultation period. The discussion paper circulated ahead of the Roundtable Workshop on Natural Resources Policy on 23rd January 2017 perhaps provides a clearer insight into some of the Welsh Government thinking with respect to Natural Resources Policy implementation, based on what is currently happening. NFU Cymru is concerned and disappointed that this level of clarity and detail was not provided within the public consultation process.

We take this opportunity to provide comment and feedback on the aspects of this paper relevant to agriculture within this consultation response, as follows:

- Sheet 1 – Landscape Scale Support – The Sustainable Management Scheme (SMS)

The concept of landscape scale support is one that NFU Cymru can support; farmers view themselves as central to the delivery of such an approach. We note that Welsh Government identify the Sustainable Management Scheme (SMS) as a mechanism for delivering landscape scale support. SMS builds on the previous Nature Fund and we are not aware if the final evaluation of the Nature Fund is publically available as yet. At this stage, we are also unclear of the extent to which SMS projects have progressed through the application process to implementation stage. We, therefore, take this opportunity to place on record a number of observations on the Nature Fund/SMS approach to the delivery of sustainable management of natural resources.

Put simply, the project-based approach adopted by Nature Fund/SMS sees the role of farmers develop from that of 'scheme participant' to 'scheme designer'. This flexibility, which contrasts with the prescriptive nature of the Glastir Agri-Environment Scheme which has caused some frustration amongst the farming community, has been welcomed by some farmers who have readily embraced the concept. These farmers have made considerable efforts to develop bids for funding to undertake the delivery of environmental actions collectively. The low rates of success within farming circles compared to other groups has been a source of ongoing disappointment and there is an emerging perception that despite managing 80% of the land in Wales, this approach is not targeted at farmers and does little to empower them to take the lead. The view has been expressed that the approach simply changes the role of 'scheme designer' from Welsh Government to a range of other bodies where the levels of transparency and accountability are not always easy to determine.

The SMS approach is heavily reliant on the willingness, capacity and tenacity of farmers to take forward project development and implementation. This will not be the case in every location with the result that SMS approaches are likely to lead to areas where sustainable management of natural resources practices are readily implemented and other areas where they are not. The result is a 'post code lottery' of environmental delivery which, in our view, undermines the aspiration of the Act.

Ensuring value for money for the tax payer will be increasingly important going forward. In a period of austerity, there is a necessity to prioritise the limited resources available directly into environmental action on the ground. Projects should offer clear measureable impact and the value for money in terms of ratio of practical action to administration/management/promotional costs. A lack of join-up and integration is also a potential issue with funding of multiple projects some of which have competing/duplicating objectives but which lack the scale for transformational impact. There is also a risk that the start-stop nature of project funding can lead to the development of projects that are organisation driven underpinning core business activity as opposed to focussing on the delivery of environmental outcomes. We highlight that project approaches can result in a confusing picture for farmers that limits their ability to participate and deliver. This does not align with the long-term, landscape scale approach advocated by the new legislation.

Overall farmers in Wales, whether they have participated or not in this novel approach, are unlikely to suggest that it should be viewed as a replacement/successor for the 'traditional' pan-Wales, multi-annual funding mechanisms such as Glastir, Tir Gofal and Tir Cynnal Schemes which have developed and evolved in the light of emerging evidence over decades.

Glastir was not included as an example of landscape scale support within the discussion paper. This is very surprising given the budget allocation and the land area of Wales that falls under Glastir contract for the delivery of multiple environmental outcomes currently.

Whilst Glastir is not without its problems, the positive trends emerging from the GMEP are referred to earlier in this document. This work has made some important observations such as the need to make a long-term commitment to interventions if they are to deliver the full benefits. There is often a substantial delay, potentially several years and decades between the adoption of changes in land

management practices and the delivery of the desired environmental outputs. This fact is manifested in Principle 8 of the Convention of Biological Diversity. It is also important to recognise that changes in land management need to be sustained. Long-term thinking must be manifested into the delivery mechanisms that emerge from the Natural Resources Policy.

Overall, whilst we acknowledge there is a role for innovative, collaborative, flexible approaches within the Natural Resource Policy mix. Given the fact that the Environment Act enshrines an evidence-based approach, NFU Cymru would emphasise the need for both an entry level farmed environment scheme which would be voluntary and accessible to all farmers aimed at the protection of landscape features, biodiversity, carbon, soils and water; together with an advanced farm environment scheme that goes above and beyond the entry level and would suit farm businesses in designated areas or with designated sites. Further information is provided later in this paper.

- Sheet 2 – Nature Based Solutions

NFU Cymru welcomes the fact that Welsh Government is considering all possible funding streams for developing more sustainable and robust land management. NFU Cymru is acutely aware that farmers remain largely unrewarded through conventional markets for the vast majority of the goods and services they provide. We identify farmers in Wales would be keen to explore options to attract private funding to secure and enhance the ecosystem services they provide through a Payment for Ecosystem Services (PES) approach.

Welsh Government rightly recognises the challenge of turning PES from an aspiration to reality. Our observations suggest that whilst PES has been increasingly emphasised in recent years as a model for delivering sustainable management of natural resources objectives - and we are supportive of the concept - the extent to which 'pure' markets can be established remains questionable and the evidence, thus far, suggests that connecting beneficiaries and providers is far from straightforward with private investors disinclined to engage.

Whilst the examples of small scale schemes such as the Welsh Water Weedwiper trial which provides equipment free on loan are welcome and they have been shown to deliver measurable improvement in water quality – they bring no direct income to farmers so they do not pay for an ecosystem service as such.

In terms of farmers managing a catchment for water, for example, from our discussions with water companies we are clear they will require enhanced standards of regulation and enforcement of the farming sector before they are prepared to 'come to the table'. NFU Cymru does not believe this to be a realistic proposition, particularly in the context of Brexit and our transition out of the EU. It is important to acknowledge that trading partner expectations will be a key driver in shaping the post-Brexit regulatory landscape. Farmers in Wales cannot accept ever increasing levels of regulation on the vague promise that it could possibly lead to a PES approach for some of them. We emphasise that farmers in Wales cannot be disadvantaged *vis a vis* their competitors in the other UK home nations, residual EU and globally when it comes to the regulatory regime under which they are expected to operate. Welsh Government must safeguard the industry's interests in this regard by not introducing regulation which undermines Wales' competitive position.

We also foresee a danger that the value of services such as food, fuel and fibre production together with future production potential are undervalued. Whilst market data is readily available for current values to agricultural produce we do not feel that these values recognise the future value to society of food security and of home-produced food as supplies in the global context tighten in years to come. The importance of maintaining and preserving productive agricultural land for future food security, reflecting its long-term value to society must be a key consideration with the Natural Resources Policy.

- Sheet 3 – Resilience

We note that Welsh Government refer to the inter-relationship between the Natural Resources Policy and Nature Recovery Action Plan under this heading.

NFU Cymru would take this opportunity to highlight that the last decade has shown an improving situation for the natural environment as evidenced through the Welsh Government's Sustainable Development Indicators. Sustained efforts by farmers in the main, but not exclusively, through participation in agri-environment schemes has resulted in an improvement in the condition and maintenance of many habitats and species. Many of the species valued by society are present due to existing land management practices undertaken by farmers. The delivery of wider non-market benefits including biodiversity are, therefore, highly dependent on active land management.

This active land management undertaken by farmers can only take place if core agricultural businesses are viable. Indeed it is important to note the fact that viable agricultural businesses are vital to underpin the delivery of a wide range of environmental, social and cultural benefits, including biodiversity. The term resilience must, therefore, be considered in the broader sense.

As we enter a period of transition out of the EU there is a need to recognise that continuing active land management is now especially vulnerable with mechanisms delivered through the Common Agricultural Policy that contribute to both viable agricultural businesses and the maintenance and enhancement of our environment coming to an end. A key focus of Natural Resources Policy should be to recognise this and develop and fund new mechanisms to replace them.

We would also take this opportunity to highlight the very important role of our native Welsh livestock breeds, in particular, the hefted flocks which are increasingly under threat. We note that this genetic resource is afforded protection under Aichi target 13, which the Nature Recovery Action Plan is aligned to, and we would stress that it is vital that the genetic diversity of our farmed livestock together with the very specialist skills required to keep them are not lost.

- Sheet 4 – Landscape Scale & Nature Based Solutions

NFU Cymru notes that under this heading, Welsh Government is referring to Post EU Exit – Future Land Use support and we welcome that the fact that Welsh Government state that *'following the UK's departure from the EU, the Welsh Government has made it clear it expects to receive at least commensurate funding from UK Government to that received via the Common Agricultural Policy'* within this document.

We further note that Welsh Government expect to have *'devolved freedom to operate bespoke support policies tailored to the needs of rural Wales and framed within the context of our legislative duties under the Environment and Well-being of Future Generations Acts'*. NFU Cymru would suggest that in addition bespoke support policies need to also consider the broader context set out earlier.

In developing a future land use support approach, Welsh Government should recognise the need to ensure the level of support made available to Welsh farmers together with the regulatory environment is on a par with our principal competitors; this will include farmers within the rest of the UK as well as with countries in the rest of the EU.

On that basis we believe that there is a strong argument for the four UK Governments to jointly agree a common overarching agricultural framework that will determine the level of funding made available to farmers in the four countries and this should be hypothecated using the same formula that is currently used to distribute CAP payments from the EU to the UK devolved administrations. Similarly we believe that communication between the administrations is vital to ensure that all four countries

work together in partnership to ensure that we have 'fit for purpose' policies which farmers understand, that cross border farmers are in no way disadvantaged and there are no constraints on trade within the UK.

NFU Cymru believes that the move away from CAP allows for the establishment of a new deal with society – a clear and stable consensus on what farming can deliver for the economy, for consumers and for the environment. A deal that recognises and values the full range of goods and services provided by farmers and that delivers a fair deal on trade, a secure business environment, reasonable returns from the market and access to the modern technology needed to compete on a global stage. NFU Cymru wants our farmers to play a part in producing food to world leading standards of animal health and welfare whilst at the same time maintaining and enhancing the quality of our environment.

We note from the discussion paper circulated ahead of the 23rd January workshop, that the '*Natural Resources Policy will inform and direct the design and delivery of the package of measures*' for future land use support post Brexit. We are somewhat concerned that this is not explicit within the Natural Resources Policy consultation. We place on record our concerns that this lack of clarity will severely hamper the ability of our members to engage and respond properly to the consultation. This is most concerning to us.

Given that the Natural Resources Policy will set out the Welsh Ministers' policies for contributing towards the sustainable management of natural resources together with the risks, opportunities and priorities for action, NFU Cymru is concerned that this relatively narrow framing of future land use support will result in the economic, social and cultural well-being of rural Wales being understated in future domestic agricultural policy as a result.

We refer to the five objectives of the Common Agricultural Policy which determines support across the 28 Members States of the EU currently:

- To increase agricultural productivity
- Thereby, to ensure a fair standard of living for agricultural producers
- To stabilise agricultural markets
- To guarantee regular supplies for food to consumers
- To ensure reasonable prices of food to consumers

Since its creation, the Common Agricultural Policy has adapted to meet new challenges. Successive reforms have increased market orientation and improved the integration of environmental requirements. The Common Agricultural Policy ensures consumers have access to food that is affordable, safe and produced to high animal welfare, food quality and environmental standards expected by consumers.

Whilst Welsh Government now has the opportunity to reshape agricultural policy so that it is fit for purpose, forward thinking and operates within its own new legislative framework, the policy objectives that underpin the Common Agricultural Policy remain as relevant to Wales as ever before.

To be clear, NFU Cymru does not believe that environmental and sustainable management of natural resources objectives should be the sole driver of future agricultural policy. Instead the future package of land use support post CAP should be viewed as and designed to be a key delivery mechanism for the Natural Resources Policy on 80% of the land area of Wales. In addition, future agricultural/land use support policy should also be viewed as a key delivery mechanism to deliver wider economic, social and cultural well-being goals. This will be vital if the Natural Resources Policy is to be delivered successfully.

The discussion paper establishes a number of goals for future land use support and makes reference to the fact that Welsh Government will seek to diversify land use to increase resilience and ensure greater value from primary production sectors. NFU Cymru is concerned that insufficient information has been provided within the consultation and in the discussion paper for us to provide a detailed response.

In principle NFU Cymru is a strong advocate of farm business development that takes advantage of emerging market opportunities, indeed creating the policy and regulatory framework within Wales that allows this to happen forms a key part of our role. We would be concerned if the Natural Resources Policy and the Area Statement process resulted in limitations or restrictions on business development in certain sectors or in certain areas. NFU Cymru would not support this.

Similarly NFU Cymru could not support a Natural Resource Policy that puts in place mechanisms to drive widespread land use change away from agriculture. We believe such an approach would not contribute to the economic, environmental, social and cultural well-being goals; would not be in line with Wales's global responsibilities; would not be in line with long-term thinking enshrined in the Acts and would need to form part of more detailed consultation.

NFU Cymru also wish to place on record that the delivery of Natural Resources Policy should not be achieved through additional regulation on farm businesses. Regulation adds cost and complexity and hinders business confidence and economic growth. Farmers in Wales must not be placed at a competitive disadvantage to their counterparts in the UK and EU. Instead the Natural Resources Policy should provide an 'enabling framework' to help farmers make informed choices about environmental management.

We note Welsh Government will also seek to implement nature-based solutions at scale to alleviate wider societal concerns such as flood, air and water quality whilst also generating additional opportunities to improve public health and education through increased public access to the countryside. NFU Cymru would reiterate the point made throughout this response – many of the goods and services delivered by farmers including those described above remain largely unrewarded through conventional markets. Whilst some nature-based solutions at scale potentially contribute and enhance existing farming activity, there should be no doubt that others will severely impede on the day-to-day running of farm businesses and overall food security. They have the potential to reduce productivity and competitiveness and hinder the ability of farmers to earn a living through conventional markets. As such it will be necessary to ensure that farmers involved in the delivery of these benefits are both compensated and rewarded through the public or private purse. Such schemes must be developed in collaboration and must work for farmers.

In terms of public access we highlight that with 80% of the land area of Wales agricultural, farmers are the key providers of the landscape and countryside upon which many access and recreation activities depend. In terms of increased public access to the countryside as a mechanism to improve public health and education, NFU Cymru would highlight that whilst we are strong advocates of measures that improve public understanding and appreciation of farming and we acknowledge the role that outdoor recreation can play in helping to address low levels of physical activity in Wales, we have found no evidence to show that the solution lies in simply providing greater and greater amounts of public access. Indeed, the evidence shows that despite a threefold increase in land accessible by right since devolution, usage numbers have remained fairly static and have been shown more recently to be declining. Our assessment is clear that in taking forward such an approach Welsh Government would be exposing access users to unnecessary levels of risk that could not be mitigated.

With respect to renewable energy, we highlight that farmers in Wales have a significant interest in land-based renewable energy production and more acknowledgement should be given for agriculture's potential to decarbonise the rest of the economy through land-based renewables.

However, many barriers remain to the implementation of renewable technologies at farm level including the planning and permitting systems, establishing grid connection for export. This opportunity also has to be considered in the context of reducing certainty over public support via the Feed In Tariffs and the Renewable Heat Incentive which challenges the viability of many farm scale projects.

NFU Cymru recognises that adding value to primary produce will provide an opportunity for some farm businesses in Wales. It is also important to acknowledge that this will be insufficient to address the vulnerability of some sectors should Brexit result in lack of access to market and free trade with the remaining EU Member States.

We take this opportunity to highlight the opportunities presented by public procurement. The share of Welsh produce in public procurement contracts remains low with considerable room for improvement. EU legislation has often been cited as one of the reasons why we cannot support Welsh producers through public procurement contracts and EU exit provides Welsh Government with an opportunity to revisit this.

We note, from the discussion paper, that Welsh Government proposes to deliver the goals through a combination of mechanisms including reviewing examples of best practice from existing support schemes; considering the opportunities that arise from removing some of the constraints of CAP rules; using the best available science, robust monitoring; together with increasing aim to operate programmes at a collaborative landscape scale involving multiple partners.

In our view these are not mechanisms for delivery in themselves, rather the key considerations that Welsh Government plan to take into account by which new mechanisms for delivery can be developed. NFU Cymru has already embarked on this process. As highlighted in the introduction to this consultation, NFU Cymru has undertaken significant consultation with our members on what the shape of agricultural policy in Wales should be post-Brexit. The Policy Statement that has emerged from this consultation process is attached in Annex 2 for information.

We are clear that Natural Resources Policy formulation cannot occur in Wales in isolation given the extent of inter-dependency with a range of other factors.

- Sheet 9 – Climate Change Mitigation and resilience through Nature-Based Solutions

NFU Cymru would stress that Welsh agriculture should not be put at a disadvantage compared with some of its competitors through the development of the Natural Resources Policy. In addition, Welsh carbon budgets established under Part 2 of the Environment Act must reflect practicable but stretching interim goals with production sectors incentivised to take action without being placed at an unreasonable competitive disadvantage.

Welsh emissions targets should not be achieved through reduced production in Wales and increased reliance on imports. Whilst such imports would not be included within carbon budgets and targets for Wales, such a practice would effectively 'export' production related emissions. An over-reliance on such an approach would not be in line with the aspiration of being a 'globally responsible Wales' as enshrined in the Well-Being of Future Generations Act. It is also important that Wales does not become over reliant on overseas production given the potential risks to food production globally as a result of a changing climate.

We also highlight that scientific evidence amassed so far indicates that there is an ultimate limit to GHG reductions from agriculture, bearing in mind the physical and biological constraints of what will remain a predominantly outdoor production process as well as consumer concerns about the shape of the countryside. Consequently there is a need to recognise that agriculture may face a steeper

trajectory of GHG emissions reduction after 2030 but additional mitigation measures will be fewer in number with generally less certainty about their applicability or mitigation potential.

We remain concerned that overall there is a lack of monitoring of measures that mitigate GHG emissions from Welsh agriculture. The majority of emissions accounted for by the Agriculture Inventory are in the form of methane from enteric fermentation in ruminant livestock and from slurry/manure stores and nitrous oxide from application of manufactured nitrogen fertiliser and from slurry/manure applied and deposited. Key opportunities for mitigation occur through reducing the GHG intensity of Wales's agricultural production (i.e reducing GHG per unit production); protecting existing stores of carbon on farm (trees, soils with high organic matter which are currently accounted for in another part of the Inventory); off-setting operations by increased C sequestration and on-farm energy generation, however, the mitigation potential of such actions are not captured at present. This severely limits the ability of the sector to demonstrate year-on-year measurable improvement that carbon budgeting will require.

Overall, NFU Cymru believes that in taking forward the development of the Natural Resources Policy, Welsh Government needs to:

- Recognise that post Brexit, any future trade policies and the ability to access markets, inside or outside the EU will have a significant influence on the design and mechanisms used to support a new domestic agricultural policy. The new domestic agricultural policy needs to build on agriculture's environmental role but also contribute to the economic, social and cultural well-being of Wales
- Recognise that we need a productive and progressive farming industry that is also profitable. Profitable farm businesses are not only more likely to invest in the environment, continued active land management is highly dependent on viable farm businesses.
- Recognise the ambitions to increase growth in agricultural production in line with the Food Strategy for Wales and the predicted challenges to our global food production system, alongside protecting and enhancing the environment. This does not mean that agricultural production should be increased at cost to the environment – farmers recognise that the natural environment is key to their productive potential
- Recognise that farmers are part of the solution – the agricultural sector manages over 80% of the land area of Wales and are key to helping protect, maintain and enhance our environment and the Welsh landscape and also key to producing high quality, safe and affordable food.
- Recognise the contributions and improvements that farmers have made to the environment and our landscapes and continue to undertake in the context of profitable business models. Many indicators and trends show an improving picture for our environment and we need to be proud of our successes and continue to build on this
- Further improvements in landscape character, soil management, water quality, wildlife and air quality are best achieved through efficiency gains, better use of resources, participation in agri-environment schemes and voluntary, partnership approaches
- Recognise the need for a range of instruments and measures within the post Brexit agricultural policy and acknowledge the importance of a workable agri-environment scheme, accessible to all farmers
- Recognise that the environment can't be improved in every regard in every location – for example, protecting water quality may require wildlife habitats or landscape character to be changed in appearance and location; what is good for nitrate mitigation may be poor in terms of greenhouse gas emissions.
- Recognise that land management that provides multiple benefits and public goods must be positively rewarded. Income foregone calculations provide a crude measure of public value and do not properly compensate for primary and secondary goods and services provided by farmers.

Framework for a future domestic agricultural policy

NFU Cymru recognises that the decision to leave the EU presents us with a unique opportunity to set out a clear vision for the future of Welsh agriculture. It provides us with the chance to shape and develop policies that will enable us to realise our ambition of a productive, progressive and profitable industry that will deliver jobs, growth and investment for Wales. We are clear that the focus must be on a growth agenda whilst recognising the need to do this sustainably.

For decades Welsh farming has been subject to policies set at a pan-European scale, implementing successive CAP reforms driven by political and economic pressures on the European stage. Looking forward, the creation of a new policy framework designed for Wales will reflect the new legislative framework enshrined in the Well-Being of Future Generations and Environment Acts. Future domestic agricultural policy should also be shaped by our emerging understanding of the post Brexit trading environment and other global drivers. Brexit also presents opportunities to amend our regulatory framework to do things in a simpler, most cost effective way. This is not about lowering environmental standards, but rather this is about establishing policies and regulatory frameworks that are outcome focussed, evidence based, established on sound science, proportionate and fair.

NFU Cymru believes that we now have a golden opportunity to bring together the full range of goods and services provided by Welsh farming under the umbrella of a 'Brand Wales' concept and marketing our story globally – an integrated strategy encompassing food, tourism and the full range of ecosystem goods and services provided by Welsh farming and our reputation for high quality produce underpinned by high environmental, human and animal health standards.

Post Brexit Agricultural Policy has been the focus of considerable discussion and debate amongst our membership and during the course of the consultation process, our members re-affirmed that the following ten key policy principles established and agreed by the NFU Cymru Welsh Council on 5th July 2016 should form the basis of a 'fit-for-purpose' post Brexit domestic agricultural policy:

- To secure the best possible access to European markets which will continue to be the main export market for the Welsh food and drink industry.
- To secure trade agreements with countries outside the EU on the most favourable terms possible.
- New trade agreements must not open our own market to imports that are not produced to our world leading standards.
- Securing food supplies for our nation in the context of global challenges must be a priority and Wales must continue to be seen as a country that produces food of the highest provenance and quality.
- Implement a domestic agricultural policy that ensures we remain competitive with farmers in the EU who will remain our principal competitors. The support given to Welsh farmers must be simple to administer, easy to understand, on a par with EU farmers and target support at those who take the financial risks associated with food production.
- Implement rural development policies that improve productivity on farm in a sustainable way.
- Implement agri-environment schemes that positively reward farmers for public / environmental good measures.
- The regulatory landscape in Wales must be overhauled; voluntary approaches should be adopted wherever possible with regulation considered as a last resort.
- Sound science must be at the heart of all decision making. Populist and sensationalist campaigning must not be allowed to cloud and shape decision making.
- The Welsh food and drink industry must be able to access the necessary supplies of labour, both seasonal and full time.

Form and scope of future domestic agricultural policy

In taking forward the development of a domestic agricultural policy, there is a need to recognise that most countries in the world have introduced agricultural policy measures to address various issues, including price and market volatility, environmental protection and enhancement and improvements in sectoral economic performance.

Consultation with our members demonstrated support for a policy comprising a suite of different instruments and elements aimed at delivering a range of public goods and outcomes that society seeks. The NFU Cymru Policy Framework sets out a purposefully high level with respect to our preference for specific agricultural policy instruments. This is because the nature of future trading arrangements is not yet known and will dictate the competitive environment in which farm businesses operate. Agricultural Policy measures must be modulated to match and prepare farm businesses for this trading environment. The key policy elements are:

1. Crisis Management/ Market Stabilisation

Measures that underpin Welsh agriculture to deal with crisis and exceptional / emergency events e.g. crisis management of the market in the event of trade bans, extreme commodity cycle downturns, exceptional weather events, serious adverse impact on income as a result of pests and disease and other exceptional events are a critical component of future agricultural policy.

2. Base Support

Farmers are subject to significant levels of income volatility driven by environmental, economic and political factors. The majority of these factors are beyond the farmers control; this volatility weakens the rural economy, threatens the continuity of supply to the food processing industry and exposes consumers to food price inflation.

A basic support measure open to all farmers that underpins agriculture and food production and recognises the unparalleled contribution of farming to the economic, environmental, social and cultural vibrancy across the whole of Wales, in line with the Well-Being of Future Generations Act.

3. An Entry level Farmed Environment scheme

A voluntary measure, accessible to all farmers which gives every farm business the opportunity and potential to contribute to practical environmental management including the protection of landscape features, maintenance of farmed habitats to support farmland biodiversity, carbon, soils and water. This delivers landscape scale sustainable management of natural resources in line with the aspiration of the Environment Act and Natural Resources Policy.

4. An Advanced Farmed Environment Scheme

This is a scheme designed for farmers who wish to go above and beyond the entry level farmed environment scheme, offering multi-annual agreements in line with the latest evidence that demonstrates the need for long-term commitment to interventions. It will be a key mechanism to address a number of the key challenges outlined in the Natural Resources Policy consultation including safeguarding and increasing carbon stores, improving the quality and maintaining the availability of water, improving the quality and connectivity of our habitats and retaining the distinctiveness of our places and historic landscapes.

It would more likely suit those farming in designated areas or with designated sites on their farms, areas with significant natural constraints and farms who have been involved for a significant period of time in agri environment measures. This scheme could be a mix of area based payment and capital measures and be on a whole farm or part farm basis. This element would also include an option specific to farmers' involved or entering Organic production. In the future, if and when markets for

ecosystem services are developed there may be the opportunity to include this type of approach within the Advanced scheme.

5. Investment Measures

Investment measures are required to facilitate the development of farm businesses with funding made available to support investment in modern on-farm infrastructure, the latest technologies and innovations. Driving improvements in business and environmental performance at farm level is central to our vision of a productive, progressive and profitable industry that will deliver jobs, growth and investment for Wales and enhance the competitiveness of Welsh farming on a global stage.

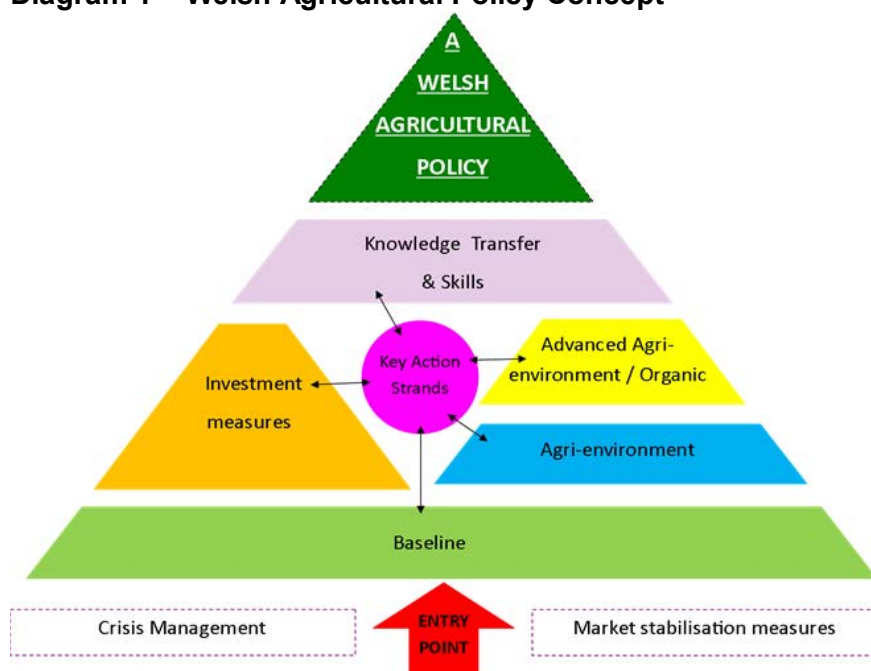
This would encompass instruments like capital grants and measures to incentivise the uptake of new equipment, facilities and technology on farm. Investment measures have a significant role to play in the delivery of the Natural Resources Policy. Investment in on-farm infrastructure and equipment has a significant contribution to make in terms of water quality and soil management. Measures that improve the efficiency of farming systems bring about a carbon emissions mitigation effect through reduced emissions per unit of production. Innovation and advancements in technology have the potential to further contribute to Natural Resource Policy objectives in the coming years – this measure should support rapid and widespread deployment.

6. Key Action Strands / Knowledge Transfer and Skills

Closely linked with the Investment measures and Advanced farmed environment scheme and based on the concept of supporting and incentivising farmers through an iterative process of measurement, action and review would be a knowledge transfer and skills element that would ensure that Welsh farming businesses are given access to the latest Research and Development, knowledge and teaching to ensure that they are equipped with the information and technical ability needed to improve business performance through increased efficiencies, improved environmental performance and improved market returns.

Overall, the measures combine into an integrated model of sustainable agriculture utilising financial capital to simultaneously raise levels of human, social, environmental and physical capital. A model that delivers on the Well-Being Goals established in the Future Generations Act and sustainable management of natural resources enshrined in the Environment Act.

Diagram 1 – Welsh Agricultural Policy Concept



Key outcomes include increased financial resilience to economic and environmental pressures; safeguarding and promoting self-sufficiency; supporting Welsh food and drink industry – Wales's biggest employer; driving investment, innovation and productivity; promoting rural jobs and supporting social, cultural economic and environmental sustainability for the rural and wider economy; delivery of environmental outcomes and maintenance and enhancement of our treasured Welsh landscape.

Moving forward with the development of the Natural Resources Policy and future domestic agricultural support, NFU Cymru is clear that transparency and clarity of purpose for both the public and farmers is critical. Charting progress and demonstrating how the industry is continuing to increase our contribution to the well-being goals through a range of key performance indicators relating to production, competitiveness and the environment will be central to this.

We are also clear that a transitional period lasting a number of years must be factored in to manage change from our current arrangements to a new agricultural policy framework. The process of leaving the EU, establishing new trade deals and creating a domestic agricultural policy will inevitably take time, possibly several years. To maintain productive capacity; to support employment in food and farming to underpin the vibrancy of our rural communities; to maintain investment in agri-environment and to protect public investment already made a period of transition will be needed.

NFU Cymru further identifies the need for appropriate governance frameworks around the development and implementation of the Natural Resources Policy, how it influences the future agricultural policy and is also translated into the area statements. The governance of the area statementing process is a particular concern given that these are expected to drive NRP on the ground and could lack an overarching framework leading to varied, disparate approach to both funding and delivery across Wales.

Finally, the need for flexibility in the face of uncertainty and for long-term intentions for the full benefits to be realised have been emphasised throughout this response. The need for a stable policy enjoying cross party support which establishes a confident basis for long-term industry investment will be vital for both the Natural Resources Policy and post Brexit domestic agricultural policy.

Conclusion

NFU Cymru has welcomed the opportunity to respond to the Welsh Government Consultation on Natural Resources Policy which sets out the Welsh Ministers' Policy for contributing towards the sustainable management of natural resources together with risks, opportunities and priorities for action.

Given that over 80% of the land area of Wales is farmed, farmers in Wales will have a crucial role in the delivering the aspiration of Natural Resources Policy. Farmers in Wales are ready to play their part. The development of a future domestic agricultural policy for Wales should, therefore, be viewed as a key mechanism to deliver Natural Resources Policy in Wales. Future domestic agricultural policy should also be framed to support the delivery of broader economic, social and cultural goals that recognise the strategic importance of the sector and underpin the vibrancy of rural Wales during the period of unprecedented change and uncertainty ahead.

Embedding the ways of working enshrined in the Environment Act including adaptive management, evidence-based decision making together with collaboration and engagement will be important if we are to secure the best outcomes and NFU Cymru would welcome the opportunity to work in partnership with Welsh Government and other partners on the development and implementation of both the Natural Resources Policy and future domestic agricultural policy for the benefit of farming, the environment and the economy of Wales.

Annex 1 - The Contribution of Agriculture to the Well-Being of Wales

The Welsh Government Well-Being of Future Generations (Wales) Act 2015 is designed to improve the social, economic, environmental and cultural well-being of Wales. The Act establishes seven goals that all public bodies, including Welsh Ministers, must work to achieve. The contribution that farming makes to achievement of all seven goals is unparalleled by any other industry, as highlighted in the following below:

Well Being of Future Generations Act: Well-being Goals	NFU Cymru: Agriculture is the Answer
A prosperous Wales	<ul style="list-style-type: none"> • 60,000 employed full or part time in farming in Wales • £1.5bn Gross Output • Farming underpins a food supply chain worth over £6bn • Over 220, 000 people in Wales are employed in the agri-food sectors – that's 17% of the workforce and Wales's biggest employer • The Welsh countryside managed by farmers provides the backdrop for the tourism industry worth over £2.5bn • The Welsh agricultural industry is a key generator of wealth and employment for the people of Wales
A resilient Wales	<ul style="list-style-type: none"> • Farmers care for 81% of total land area of Wales – that's over 1.84m hectares • 600,000 ha of environmentally designated areas • Almost 560,000 ha managed under Glastir Entry Sustainable Land Management Scheme designed to combat climate change, improve water management and maintain and enhance biodiversity • Farming supports a diverse range of species, habitats and ecosystems • Farmers provide a range of ecosystem services including carbon sequestration and management, water quality and water quantity management for flood alleviation • Low carbon, local energy installations have the potential to meet 57% of Wales's electricity consumption and the evidence shows a large proportion of projects are located within Wales's rural local authorities • GHG emissions from agriculture have declined by 20% since 1990 and further decreases are being achieved through production efficiency measures • Welsh farmers play a key role maintaining and enhancing our natural environment and supporting the provision of a full range of ecosystem services
A healthier Wales	<ul style="list-style-type: none"> • Welsh agriculture is a key provider of safe, nutritious, high quality Welsh food which plays a fundamental contribution in supporting the physical and mental well-being of the people of Wales • Welsh farmers are known to operate to some of the highest standards of welfare and production in the whole world • Welsh farming also delivers a significant proportion of Wales's access provision which includes 16000 miles of footpaths, 3000 miles bridleways, 1200 miles of cycle network, and 460,000 ha of open access land • Welsh farming makes a key contribution to the physical and mental well-being of the people of Wales
A more equal Wales	<ul style="list-style-type: none"> • Rural Wales is home to 33% of the Welsh population. • The vitality and potential of rural areas is closely linked to the presence of a competitive and dynamic farming sector. The NFU Cymru 'Why farming Matters to the Welsh Economy'

	<p>shows that each family farm is typically economically linked to some 40-80 other businesses in the region</p> <ul style="list-style-type: none"> • Through direct and indirect employment in rural communities, Welsh farming underpins the rural economy and contributes to a more equal Wales
A Wales of cohesive communities	<ul style="list-style-type: none"> • Local communities in rural Wales are heavily dependent on agriculture for financial and social prosperity. • Leadership and voluntary roles in rural communities • Welsh farmers make a key contribution towards the provision of attractive, viable, safe communities in rural areas
A Wales of vibrant culture and thriving Welsh language	<ul style="list-style-type: none"> • Agriculture has the highest proportion of Welsh speakers of any sector. • Farming is the bedrock of rural communities across Wales which have been shaped by farming activity spanning hundreds of years. Farmers continue to maintain these traditions, preserving rural culture and sense of place • Welsh farmers are key promoters and protectors of our culture, heritage and the Welsh language
A globally responsible Wales	<ul style="list-style-type: none"> • Current levels of self-sufficiency at a UK level are at 62% • Future challenges to our global food production system include climate change, a growing UK and global population, water scarcity. Given its climate and rainfall, Wales is predicted to be an area of favoured production in the future • Welsh farmers have a key role to play feeding the people of Wales and in contributing to global food security now and in the future.

Policy Statement

BREXIT POLICY PAPER

NFU Cymru

February 2017

Introduction - Building the case for Post-Brexit Agriculture

The decision to leave the European Union presents us with an unique opportunity to set out a clear vision for the future of Welsh agriculture. It provides us with the chance to shape and develop policies that will enable us to realise our ambition of a productive, progressive and profitable industry that will deliver jobs, growth and investment for Wales. This was the clear message that we received from our members during the course of the NFU Cymru Brexit roadshows across Wales.

For decades Welsh farming has been subject to policies set at a pan-European scale, implementing successive CAP reforms driven by political and economic pressures on the European stage. Looking forward, the creation of a new policy framework designed for Wales will reflect the new legislative frameworks enshrined in the Well-Being of Future Generations and Environment Acts.

The Well-Being of Future Generations (Wales) Act 2015 places a duty on all public bodies to protect and enhance the economic, environmental, social and cultural well-being of Wales. Whilst the Environment (Wales) Act 2016 establishes a new legislative framework for the sustainable management of natural resources and puts in place the legislation needed to plan and manage Wales' natural resources in a more proactive, sustainable and joined up way.

This new legislative framework allows for the establishment of a new deal with society - a stable and transparent consensus on what farming can deliver for the economy, for consumers and the environment. A deal that recognises and values the full range of goods and services provided by farmers and that delivers a fair deal on trade, a secure business environment, reasonable returns from the market and access to the modern technology needed to compete on the global stage. These objectives held true before the Brexit vote, but will be ever more relevant and necessary in the decades ahead.

Our vision is simple: that productive, progressive and profitable farm businesses are central to a growing and dynamic Welsh food and drink industry. The Welsh Food and Drink sector can meet the ambitious £7 billion sales target by 2020 and work must take place now on the strategy to grow the sector beyond that. It is important that we focus on a growth agenda whilst recognising the need to do this sustainably – indeed this is viewed as central to the positioning of our global brand. Farmers manage over 80% of the land area of Wales and we want all our farmers to play a part in producing food to world leading standards of animal health and animal welfare whilst at the same time maintaining and enhancing our environment and ensuring we are continually improving our carbon footprint per unit of production.

Our membership is proud of what they contribute to the nation and to the economic, environmental, social and cultural well-being of Wales. Welsh Farming businesses are the backbone to the Welsh rural economy, the axis around which rural communities thrive. The raw ingredients produced on Welsh farms are the cornerstone to the multibillion pound food and drink industry, employing nearly a quarter of a million people. We are part of a UK food and drink industry worth £108bn to the economy.

Welsh farmers also play a key role maintaining and enhancing our natural environment and supporting the provision of a full range of ecosystem services which not only supports a diverse range of species, habitats and ecosystems but also provides a significant backdrop for our tourism and recreation sector worth an estimated £2.5bn annually.

Overall Welsh farming makes a unique contribution to the well-being of Wales as summarised in Annex 1.

The extensive benefits which agriculture provides to the wider economy, society and to the environment exemplifies the strategic importance of the sector to Wales as a whole. This is likely to

increase significantly going forward. The challenges to our global food production system are, by now, well documented. A growing world population; increasing demand for high quality diets; greater competition for land, water and energy and the increasing impact of climate change which will see Wales become an area of favoured production in future with an increasingly important role in securing food supplies.

In the global context, the importance of maintaining and preserving productive agricultural land for future food security is, therefore, an ecosystem service that should be safeguarded. Welsh farming also produces a range of other products such as fuel, fibre and electricity through a range of renewable technologies. It is important to note that many of the wider benefits that farming delivers do not currently have a market value. Whilst Payments for Ecosystem Services (PES) has been increasingly emphasized in recent years, the potential to establish 'pure' markets for a range of ecosystem services has yet to be realised.

Our members are clear that this is our opportunity to put the building blocks in place for a post Brexit Welsh Agricultural policy that delivers for Wales and ensures we are competitive on UK, EU and global markets.

NFU Cymru believes that we now have a golden opportunity to bring together the full range of goods and services provided by Welsh farming under the umbrella of a "Brand Wales" concept to market our story globally. This would focus on having a unique selling point for marketing Wales and all the products and services that we provide. Our vision is for an integrated strategy encompassing food, tourism and the full range of ecosystem services provided by Welsh farming and attracting inward investment to Wales based on Wales being a country of high quality products based around a strong natural asset base.

The NFU Cymru consultation following the Brexit vote has been the biggest of its kind in our history. All of our members have had an opportunity to have a say and share their views on what a future agricultural policy should look like for their businesses. Our next generation of farmers are also very actively engaged in our consultation process; decisions made now will shape their working lives. Our members are clear that this is our opportunity to put the building blocks in place for a post Brexit Welsh Agricultural policy that delivers for Wales and ensures we are competitive on UK, EU and global markets.

The process of leaving the EU, establishing new trade deals and creating a domestic agricultural policy will take time, possibly several years. To maintain productive capacity, to support employment in food and farming and to maintain investment in agri environment a transitional period lasting a number of years must be factored in to manage the change from our current arrangements to a new policy framework.

Our analysis and our member consultation shows that there are strong links and inter-dependencies between different parts of the policy settlement the UK Government must agree with the EU – trade will be a key part of these negotiations. What trade agreement is eventually agreed will quite possibly define the regulatory system in which businesses must function. That is why this paper provides some early advice to our Governments on the critical elements for farming in any future relationship.

Brexit is not about burning bridges, but building them; making clear the industry's importance to politicians and consumers, but also maintaining links with the Europe, our largest and closest export market and a critical source of labour for the food and drink industry.

An important theme running through member meetings has been a request for NFU Cymru to work with new as well as current partners to highlight the strategic importance of our sector - the unparalleled contribution agriculture makes to the social, economic, environmental and cultural well-being of Wales to Government. Competition for the Government's attention and resources will only increase in the months and years ahead - we must present a clear vision and fight to have farming's

voice clearly heard. We are committed to that process and are already actively involved in this engagement through Amaeth Cymru, the strategic framework for Welsh Agriculture partnership as well as through dialogue with key environmental stakeholders and supply chain partners.

Whilst Brexit has dominated discussions these past few months it is also important that we focus on the key issues of today. Commissioner Hogan has already assured us, the UK has not left the EU until it does, so our Governments in Cardiff Bay and Westminster must continue to seek the best deal for Welsh food and farming in Brussels, as it must at home. The UK NFUs, through our well-respected Brussels office, will need to play a more influential role as the negotiations proceed. Our influence is especially important as the legacy of over 40 years of EU legislation is highly unlikely to be reformed on the UK's exit and may well form the basis of future trading relations with the EU. Throughout NFU Cymru's task is to achieve long term confidence and, crucially, short term certainty.

Realising our vision

NFU Cymru believes that we now have a unique opportunity to implement a policy framework in Wales that can deliver our vision of a productive, profitable and progressive Welsh agricultural industry. During the course of our extensive consultation roadshows this autumn our members reaffirmed that the following 10 key policy principles agreed by NFU Cymru Council on the 5th July should form the basis of our discussions with industry partners and Government for a fit for purpose post Brexit domestic agricultural policy:-

- To secure the best possible access to European markets which will continue to be the main export market for the Welsh food and drink industry.
- To secure trade agreements with countries outside the EU on the most favourable terms possible.
- New trade agreements must not open our own market to imports that are not produced to our world leading standards.
- Securing food supplies for our nation in the context of global challenges must be a priority and Wales must continue to be seen as a country that produces food of the highest provenance and quality.
- Implement a domestic agricultural policy that ensures we remain competitive with farmers in the EU who will remain our principal competitors. The support given to Welsh farmers must be simple to administer, easy to understand, on a par with EU farmers and target support at those who take the financial risks associated with food production.
- Implement rural development policies that improve productivity on farm in a sustainable way.
- Implement agri-environment schemes that positively reward farmers for public / environmental good measures.
- The regulatory landscape in Wales must be overhauled; voluntary approaches should be adopted wherever possible with regulation considered as a last resort.
- Sound science must be at the heart of all decision making. Populist and sensationalist campaigning must not be allowed to cloud and shape decision making.
- The Welsh food and drink industry must be able to access the necessary supplies of labour, both seasonal and full time.

In this paper we develop aspects of the ten key policy principles based on feedback from our consultation exercise. In undertaking this process, we recognise the need for this to be a fluid document that should develop and change over time as the impact of the referendum vote and negotiations become clearer and as discussions with industry partners and our members continue.

Framework position on trade

Introduction

The consultation confirmed that trade is a very important issue for NFU Cymru members. The EU single market is by far our biggest export destination, with around 90% of Welsh food and drink exports going into the EU market. Over a third of our lamb crop ends up on the European market.

The European market is relatively mature and growing more slowly than some emerging and developing economies. For that reason, access to these new markets is seen as becoming increasingly important in future.

NFU Cymru members are equally concerned about the future terms of import access to the UK market. The risks are seen as a potential unilateral lowering of UK tariffs, as some proponents of Brexit advocate, or bilateral free trade arrangements with countries like New Zealand or Brazil where agricultural interests risk being traded off in return for access to services markets.

The established NFU Cymru policy principles that impact in this matter are:-

- To secure the best possible access to European markets which will continue to be the main export market for the Welsh food and drink industry.
- To secure trade agreements with countries outside the EU on the most favourable terms possible.
- New trade agreements must not open our own market to imports that are not produced to our world leading standards.

Key policy elements:

- **Access to the EU Single Market**

Of the existing models, the Norwegian European Economic Area arrangement and the Swiss European Free Trade area arrangement were the most favoured from the consultation responses but a larger number are looking for some bespoke UK arrangements.

NFU Cymru was pleased to see the quite extensive references to agriculture, and the overwhelming importance of Single Market participation in the Welsh Government/Plaid Cymru Brexit White Paper, we do however now know that the UK Government intends to withdraw the UK from the Single Market, and from full participation in the Customs Union as currently constituted.

NFU Cymru appreciates that the UK Government's position on the single market participation has been informed by political sensitivities and considerations around the free movement of people, adherence to the judgements of the Court of Justice of the European Union, and contribution to the EU budget.

Despite this, NFU Cymru's primary concern remains that our access to European market should not be fettered by tariffs or non-tariff barriers. It is therefore essential that the UK Government does secure the greatest possible access to the single market via a free trade agreement, and that such a trade agreement includes agricultural produce, from the outset. It is also essential that such a free trade agreement is 'signature ready' for the point at which we depart the European Union so as to provide the industry with the certainty and continuity it needs. Losing access to EU export markets, even for a short period of time will be very detrimental to Wales' farmers.

- **Access to markets in the rest of the world**

The EU has negotiated more than 50 preferential access agreements with countries around the world. In the worst case all these would need to be renegotiated by the UK, in addition to any further deals which the UK government might like to conclude. Our determination is that any future trading

arrangements with any country, in or out of the EU, must be balanced, with the same conditions applying to imports as to exports.

- **Exposure to imports produced to lower standards**

The consultation demonstrated overwhelming support for arrangements which limit our exposure to imports produced to lower standards (for example, lower animal welfare standards, goods produced with chemicals prohibited domestically etc). This is not a straightforward matter as WTO rules prohibit discriminating against imports on the basis of their production methods.

We can help ourselves by strengthening our brand and promoting the qualities and values of Welsh and British production through assurance schemes, and NFU Cymru believes more needs to be done both publically and privately in this area. But there are limits to what can be done and this can only be a partial solution.

In addition we will need to see an adequate level of tariffs maintained and for “sensitive” sectors to be treated differently in trade negotiations.

A Framework for a Domestic Agricultural Policy

Introduction

Most countries in the world have introduced agricultural policy measures to address various issues, including price and market volatility, environmental protection and enhancement and improvements in sectoral economic performance.

The nature of the trading relationship the UK Government negotiates with the EU and non-EU countries will dictate the competitive environment in which farm businesses will operate. During the member consultation it became clear that agricultural policy measures must be designed to match and prepare farm businesses for the business/trading environment in which they will operate.

It is a valid criticism of the Common Agricultural Policy that there has been a lack of clarity over what the purpose of direct payments is, and particularly since the introduction of “greening” that the same policy instrument was expected to deliver different policy goals.

The design of a bespoke domestic agricultural policy offers the opportunity not only to design a policy to fit our needs and conditions but also to construct a multi-faceted policy with different instruments targeted at specific issues and delivering multiple benefits for society.

The UK Treasury and Welsh Government have committed to financing the current CAP budget up until 2020. Thereafter the agricultural sector will have to present a compelling case for an appropriate budget allocation reflecting the strategic importance of the sector. Our politicians will in future be directly accountable for the policy and its budget, which was not the case while we were inside the EU and subject to its CAP.

The NFU Cymru established policy principles that impact on this matter are:-

- Securing food supplies for our nation in the context of global challenges must be a priority and Wales must continue to be seen as a country that produces food of the highest provenance and quality.
- Implement a domestic agricultural policy that ensures we remain competitive with farmers in the EU who will remain our principal competitors. The support given to Welsh farmers must be simple to administer, easy to understand, on a par with EU farmers and target support at those who take the financial risks associated with food production.

- Implement rural development policies that improve productivity on farm in a sustainable way.
- Implement agri-environment schemes that positively reward for farmers for public / environmental good measures.

Form and Scope of Agricultural policy

The consultation demonstrated support for a policy comprising different instruments and elements aimed at delivering the range of public goods and outcomes that society seeks. Our concept for a new agricultural policy proposes a single flexible framework with a series of themes targeted at a number of key elements that will support farm businesses to become more productive, progressive and profitable whilst also maintaining and enhancing the quality of our environment

NFU Cymru would expect that most farming businesses will look to access support and assistance across a range of measures within the policy framework. In the following section we briefly touch upon what we see as the key elements and themes required in a new domestic agricultural policy.

Key policy elements:

7. Crisis Management/ Market Stabilisation

Measures that underpin Welsh agriculture to deal with crisis and exceptional / emergency events e.g. crisis management of the market in the event of trade bans, extreme commodity cycle downturns, exceptional weather events, serious adverse impact on income as a result of pests and disease and other exceptional events.

8. Base Support

Farmers are subject to significant levels of income volatility driven by environmental, economic and political factors. The majority of these factors are beyond the farmers control; this volatility weakens the rural economy, threatens the continuity of supply to the food processing industry and exposes consumers to food price inflation.

A basic support measure open to all farmers that underpins agriculture and food production and recognises the unparalleled contribution of farming to the economic, environmental, social and cultural vibrancy across the whole of Wales. This could be in the form of a decoupled payment or linked in some way to food production e.g. a coupled payment. A decoupled payment would be compatible with WTO rules and the infrastructure to deliver it already exists. A coupled payment is classified as blue box in the WTO and there are restrictions on their use.

9. An Entry level Farmed Environment scheme

A voluntary measure, accessible to all farmers which gives every farm business the opportunity and potential to contribute to environmental management. This could be a points-based system aimed at protection of landscape features, biodiversity, carbon, soils and water. The ambition here is to attract as many farmers and as big a land area as possible, not to constantly ratchet up standards.

10. An Advanced Farmed Environment Scheme

This is a scheme designed for farmers who wish to go above and beyond the entry level farmed environment scheme, offering multi-annual agreements in line with the latest evidence that demonstrates the need for long-term commitment to interventions if benefits for biodiversity are to be fully realised. It would more likely suit those farming in designated areas or with designated sites on their farms, areas with significant natural constraints and farms who have been involved for a significant period of time in agri environment measures. This scheme could be a mix of area based payment and capital measures and be on a whole farm or part farm basis. This element would also include an option specific to farmers' involved or entering Organic production. In the future, if and when markets for ecosystem services are developed there may be the opportunity to include this type of approach within the Advanced scheme.

11. Investment Measures

Investment measures are required to facilitate the development of farm businesses with funding made available to support investment in modern on-farm infrastructure, the latest technologies and innovations. Driving improvements in business and environmental performance at farm level is central to our vision of a productive, progressive and profitable industry that will deliver jobs, growth and investment for Wales and enhance the competitiveness of Welsh farming on a global stage. This would encompass instruments like capital grants and measures to incentivise the take up of new equipment, facilities and technology on farm

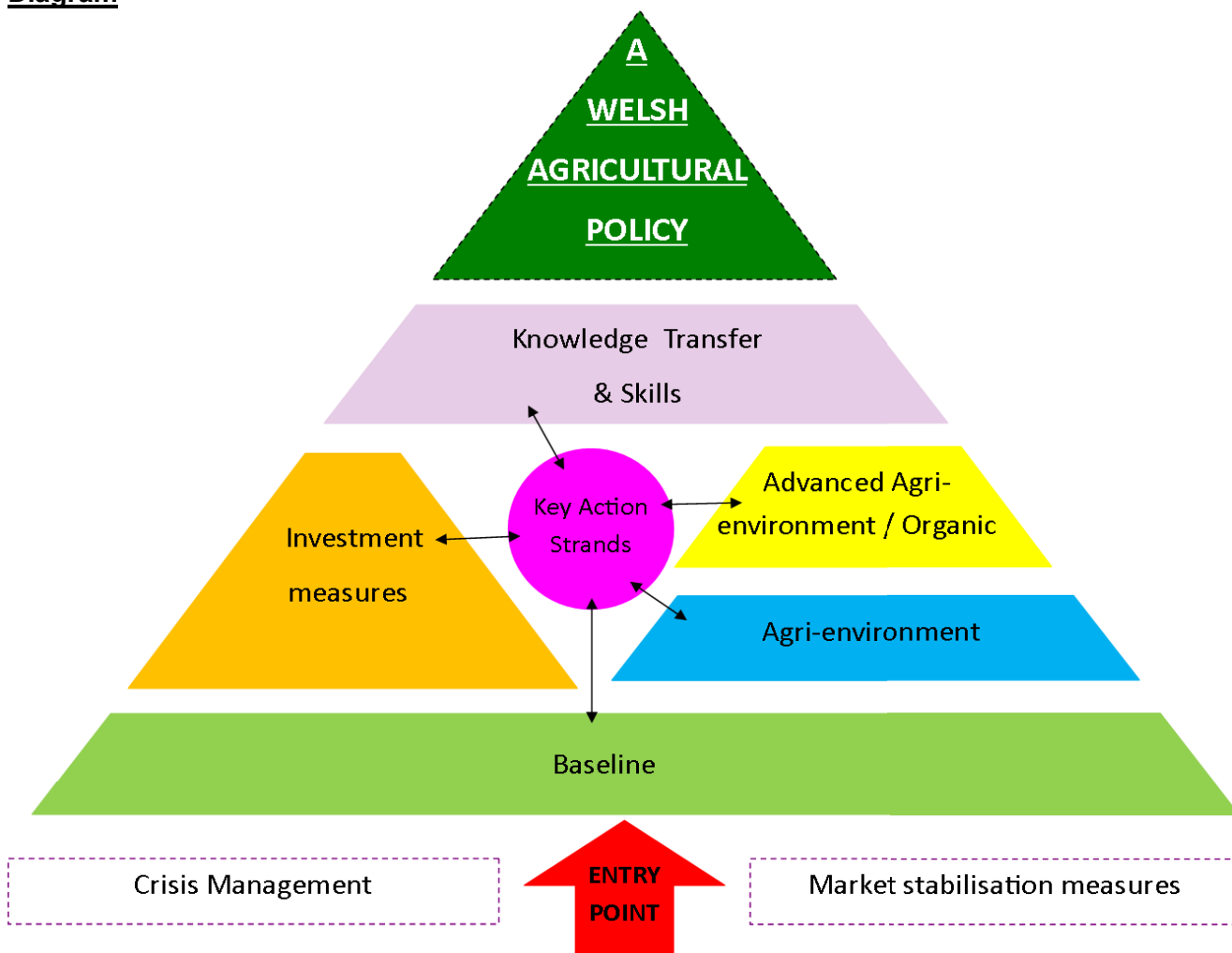
12. Key Action Strands / Knowledge Transfer and Skills

Closely linked with the Investment measures and Advanced farmed environment scheme and based on the concept of supporting and incentivising farmers through an iterative process of measurement, action and review would be a Knowledge transfer and skills element that would ensure that Welsh farming businesses are given access to the latest Research and Development, knowledge and teaching to ensure that they are equipped with the information needed to improve business performance through increased efficiencies, improved environmental performance and improved market returns.

Key Action strands would be specific themes of targeted and integrated knowledge transfer, advice and incentives which individual businesses will be encouraged to participate in to drive forward improvements in economic and environmental performance. Examples of key action strands could include the following:-

- Climate Change mitigation measures
- Environmental management, protection and enhancement
- Animal Health and Welfare
- Grassland Management and Utilisation
- Crop Agronomy and Plant Health
- Soil and nutrient management
- Farm business support / Financial performance
- Risk management measures
- Health and Safety
- Adding Value to primary produce

A Welsh Agricultural Policy Concept Diagram



What budget is required and how should it be shared?

It is not possible to quantify the budget requirements of each policy element until there is considerably more clarity over our future trade arrangements. There are two elements to this. First, if our access to the single market is restricted there could be serious consequences for some sectors: lamb being an obvious example. Second, if our markets become more open to imports from the rest of the world (either by a general lowering of tariffs or through bilateral free trade agreements with countries like New Zealand or Brazil) there will be an impact on domestic farm-gate prices.

If either or both of these things happen there will be relatively more resource needed for volatility / crisis management measures (Measures 1+2 above). If they are avoided there will be a lower resource requirement for those measures, which will allow more resource on other measures. To ensure that we maintain our productive capacity and to ensure continuity of supply to the food supply chain it will be important to consider a transitional period from current arrangements to a new domestic agricultural policy.

It is absolutely critical that there is a smooth and seamless transitional period from our current Pillar 1 and Pillar 2 arrangements to a new domestic agricultural policy. This is vital to ensure that we maintain our productive capacity and continuity of supply to the food supply chain and to ensure continuity with regards agri environment delivery. The design of a new bespoke policy for Wales must occur through a process of evolution rather than revolution and the speed of transition and the

budgetary requirements for each measure will need to be determined once our trade arrangements are known.

A very important issue that Wales has to consider is the way in which funding flows from the UK Government to Wales. Wales is currently funded via the Welsh Block Grant, a population-size based fund, which comes from the UK Treasury to Welsh Government. It pays for expenditure in areas of devolved competence, with any adjustments to the Welsh Block Grant made via the Barnett Formula.

EU funds to Welsh agriculture are not subject to the population share based calculation which underpins the Welsh Block Grant. Should any future support payment for Welsh agriculture be subject to the population share Block Grant calculation rather than the current formula for distributing EU CAP funds to Wales then the implications for Wales are potentially severe. Based on current funding levels for agriculture, NFU Cymru estimate that a population-size based calculation would result in a budget reduction of nearly 40% for Wales.

The potential funding shortfall that will arise in any move to a purely population size based grant is something which has been identified as a significant concern by both the Welsh Government and the National Assembly for Wales.

In his statement to Plenary in November, the Chair of the National Assembly's Climate Change, Environment and Rural Affairs Committee, Mark Reckless AM, spoke of the need to ensure that in terms of future funding, Wales continues to receive the level of funding for agriculture, environment and rural development that it currently receives from the European Union. The Committee Chairman also called upon Welsh Government to commit to protect funding, once transferred to Wales, for the support of agriculture, environment and rural development.

The Welsh Government/Plaid Cymru Brexit White Paper points to the fact that Wales' CAP receipts are significantly above its 'Barnett share' of UK receipts and speaks of the essential need to ensure that equivalent or greater resources to those Wales would have received from the CAP are provided from the UK to Wales to support Welsh farming. This is absolutely crucial to ensure that Welsh farming is able to deliver jobs, growth and investment for Wales and is able to deliver against the seven goals of the Well Being and Future Generations Act.

One of our key policy principles is to ensure that the level of support made available to Welsh farmers is on a par with our principal competitors; this will include farmers within the rest of the UK as well as with countries in the rest of the EU. On that basis we believe that there is a strong argument for the 4 UK Governments to jointly agree a common overarching agricultural framework that will determine the level of funding made available to farmers in the four countries and is hypothecated using the same formula that is currently used to distribute CAP payments from the EU to the UK devolved administrations. Similarly we believe that communication between the administrations is vital to ensure that all four countries work together in partnership to ensure that we have fit for purpose policies, which farmers understand, cross border farmers are in no way disadvantaged and there are no constraints on trade within the UK.

Charting our ambition

The policy elements outlined, we believe, will play a key role in increasing and enhancing our influence on the Welsh economy and we believe that it will be important for us to be able to chart our progress and demonstrate how we are continuing to increase our contribution to the well-being goals through a range of key performance indicators related to Productivity, Competitiveness, the Environment and Climate Change mitigation.

Framework Position on Regulation

Introduction

The nature and extent of the regulatory landscape emerged as quite a distinct theme during the course of our member consultation. Poor regulation is often cited as a reason for lack of farm business confidence, whilst the costs of compliance, the time given over to complying, and perhaps moreover demonstrating compliance, adding significantly to farmers' workload.

Whilst our members accepted and understood how trading partner expectations will inevitably shape the post-Brexit regulatory landscape, it also became quite clear that once we have left Europe, the expectation amongst our members is that there will be some rolling back of regulatory requirements.

The 'cover' that Europe has provided for domestic regulators seeking to pursue ever higher regulatory standards will have fallen away and our members will be looking for objective justification of any new regulatory requirements, as to whether they are truly necessary. Likewise when it comes to public procurement, post Brexit there should be scope for greater use of Welsh produce in procurement contracts, if we are no longer bound by EU rules.

NFU Cymru's members also accept that it is unrealistic to think that all EU legislation will cease to apply at the point at which we leave the EU. Our members recognise the massive task that lies ahead in terms of looking at which pieces of legislation Wales may wish to keep and which pieces we should dispense with. The Cabinet Secretary in an appearance before the National Assembly's Climate Change, Environment and Rural Affairs Committee last September estimated that there may be as many as five thousand pieces of EU derived legislation within her portfolio alone. We are therefore under no illusions as to the scale of the task ahead, but our members are clear that this does not mean the Welsh Government should not be ambitious in its task. NFU Cymru is committed to working with Government and Regulators to develop better approaches to deliver the outcomes society seeks, in line with the new framework for the sustainable management of natural resources enshrined in the Environment (Wales) Act 2016.

During the course of the consultation our members also pointed to the need for Welsh Government to ensure that as far as possible, farmers in Wales are not disadvantaged *vis a vis* their competitors in the other UK home nations and the residual EU when it comes to the regulatory regime under which they are expected to operate.

The UK Government has stated its intention to introduce a 'Great Repeal Bill' to Parliament, which will repeal the legislation which took the UK into the EEC, The European Communities Act 1972. It is widely expected that the Bill will be introduced in May 2017, but beyond repealing the European Communities Act 1972, not very much is known about the nature and scope of the Great Repeal Bill.

It is expected that the Great Repeal Bill's provisions will come in to force in spring 2019 (when the UK departs the EU) and where practicable and relevant, it will take a 'snapshot' of all directly applicable EU legislation (treaties and regulations) effective on 'Brexit day' transpose it into domestic legislation, and preserve its effect. It will also most probably make some sort of saving provision to ensure the ongoing effect of secondary and primary legislation which enacts EU legislation which is not directly applicable (i.e. directives)

What is also unclear is to what extent the Great Repeal Bill will impinge on devolved competencies and where former EU competencies might reside after they are re-patriated via the Great Repeal Bill. We note that in the Prime Minister's statement of 17th January, she spoke of ensuring that as powers are reclaimed from Brussels, *'the right powers are returned to Westminster and the right powers are passed to the devolved administrations'*

We further note that in the same statement, and in relation to existing powers, the Prime Minister said *'I should be equally clear that no decisions currently taken by the devolved administrations will be removed from them'*

The established NFU Cymru policy principle on this issue is:-

- The regulatory landscape in Wales must be overhauled; voluntary approaches should be adopted wherever possible with regulation considered as a last resort.

Key Policy Elements:

- **Overhauling the regulatory landscape and thinking about things differently**

Our members are anxious to see the significant regulatory burden under which they currently operate reduced. There are many potential approaches which can be deployed in order to roll back on regulation; these include a greater use of earned recognition and industry self-regulation. In conjunction with this, the current suite of regulation does need to be reviewed, and we want to see industry and government working together to determine which pieces of legislation can be removed from the statute books. A similar approach also needs to be taken to the rules and quasi-legislation that govern things such as cross-compliance.

- **Public Procurement**

The share of Welsh produce used in public procurement contracts remains low, and there is much room for improvement. EU legislation has often been cited as one of the reasons we cannot make greater use of Welsh produce when it comes to procurement. Post Brexit this area needs to be re-visited, with a view to greatly increasing the proportion of Welsh produce used by the public sector.

- **Regulation as a last resort**

Regulation should be a last resort, when other approaches have failed. In line with the Environment (Wales) Act 2016, ahead of introducing any new legislation, our members will be looking to see any new regulatory requirements objectively justified by government, as to whether they are really necessary. Where regulation is unavoidable, there needs to be genuine consultation and engagement with the industry, including far greater use of regulatory impact assessments.

- **A level playing field**

Wales' farmers must not be competitively disadvantaged compared to the other UK home nations, the residual EU, or the rest of the World when it comes to the regulatory regime under which they operate. Regulation is likely to be an area over which the Welsh Government will have significant control, and we are asking for our Government to safeguard the industry's interests in this regard by not introducing regulation which undermines Wales' competitive position.

Framework Position on Science and Technology

Introduction

One of the principle challenges facing farmers is the need to increase productivity and outputs whilst optimising the use of inputs in order to produce safe, high quality food in an environmentally sustainable manner. Scientific advances have led to increased agricultural production, but Europe has failed to embrace science and technology in the same way as much of the rest of the world. This year's manufactured controversy surrounding the re-authorisation of glyphosate, left many farmers questioning the ability of the European institutions to act objectively and resist the politicisation of the decision making process.

Over the last few decades, the EU has enjoyed exclusive competence around the authorisation of plant protection products and biotechnology. It is unclear whether this competence will lie at a UK or Wales level after Brexit. Wherever the decisions are taken, our members want to see the objective assessment of the potential benefits that accrue from science and innovation placed at the heart of future policy making. Whilst our members accept that trading partner expectations may influence the contents of the toolbox we have available to us, we should not find ourselves hampered at the domestic level and we are urging our politicians to embrace science and technology with an open mind.

Our members recognise there is now a real risk of a scientific brain drain away from Wales and the UK, with the loss of EU research and development funding from Europe. Once this knowledge base is degraded or lost then it will be very difficult for any government to restore. We believe that the UK and Welsh governments have a duty to maintain the world class expertise we have built up in the fields of plant and animal science, post Brexit. As part of the Brexit negotiations we are anxious that a UK outside of the EU seeks to negotiate on-going participation on EU research programmes.

The established NFU Cymru policy principle on this issue is:-

- Sound science must be at the heart of all decision making. Populist and sensationalist campaigning must not be allowed to cloud and shape decision making.

Key Policy Elements:

- **Allowing farmers to meet future challenges**

Farmers need to be allowed to meet future challenges of producing food for a growing population by optimising the use of inputs in order to produce food that is safe, high quality and produced in an environmentally sustainable way.

- **Putting sound science at the heart of the decision making process**

One of the shortcomings of the EU and its institutions was the failure to deal objectively with decisions concerning science. Instead we saw the decision making process become highly politicised, and in some instances completely stalled, something which has left the EU lagging behind much of the rest of the world. Our members are of the view that if we are to leave the EU, then we should not repeat its mistakes at the domestic level, and that is why we need to put objective assessment of the potential benefits that accrue from science, innovation and technology at the heart of the decision making process.

- **Preserving our research and development base**

Historically Wales and the UK has delivered a lot when comes to agricultural and horticultural research and development, with truly world class work in areas such as plant breeding, crop protection and animal health. As an EU Member State we have been a net recipient of EU research and development funding, with the Office for National Statistics reporting receipts of €8.8 billion over the period 2007-2013, compared to contributions of €5.4 billion. With Brexit on the horizon, there is a huge risk that this funding could be lost and with it the world class expertise that currently resides here. NFU Cymru is calling on government to ensure that as part of the Brexit negotiations that a UK outside the EU is able to secure on-going participation in EU research programmes

Framework for Access to Labour

Introduction

The consultation reaffirms the importance of access to a flexible, skilled workforce to farming's competitiveness. Brexit has highlighted access to non-UK EU born labour both on farm and in the processing sector. The number of non-UK born workers needed across the UK food chain for it to remain competitive is significant, official figures are hard to come by.

There are a number of issues that make it difficult to recruit sufficient domestic labour; flexibility of location, hours and tolerance of harsher working environments are prominent reasons. But even amongst the EU labour force there is evidence of a growing difficulty in sourcing the labour force farm business requires - this means the prospect of sourcing labour from beyond the EU also has to be considered.

Businesses indicate there is a very urgent need to focus on the short term labour supply – sterling's devaluation has made the UK labour market less competitive within the Single Market. There is a real danger that production will shift abroad unless the industry can access the supply of labour it needs and with investment plans also on hold. Shortage of labour could impact on our ability to hit our £7 billion growth target for the Welsh food and drink industry.

Our research shows that a home grown food system is highly valued. Retailers are seeking higher volumes of Welsh and British food due to the uncertainty over the exchange rate; consumers express a wish to purchase Welsh and British produce. Growing our domestic food production provides jobs, adds further value to Wales' GDP and will continue to provide us all with safe, quality and affordable food. There will ultimately be significant implications on the balance between domestic production and imports if required labour is hard to recruit, and existing skills cannot be accessed.

NFU Cymru was pleased to see that the Welsh Government/Plaid Cymru Brexit White Paper acknowledged that the Welsh food and drink sector has a 25% non-UK labour force and spoke of the need for the different sectors of the economy to be able to meet their recruitment needs where the domestic labour market has proved insufficient. The Prime Minister in her Brexit statement also acknowledged that a reliable workforce is vital to many industries.

The NFU Cymru established policy principle that impact on this matter is:-

- The Welsh food and drink industry must be able to access the necessary supplies of labour, both seasonal and full time.

Key policy elements:-

- Trial a 'substantial' fixed-term work visa scheme for agriculture and horticulture targeted at non-EU workers during 2017 (suggest max.12months), working title: Seasonal Agricultural Permit Scheme.
- Assurance that EU workers that are already in positions have right of residency in the UK and that they will have right to leave and return to their home member state
- Welsh Government to commit to holding discussions on permanent labour and seasonal labour requirements for the medium to long term within the Welsh food and drink industry.
- Levy Bodies and Government to further support investment in innovation, productive technology, robotics, automation and mechanisation, and to support science funding for research and development.
- In the longer term – working with schools, the National Land Based Colleges and universities to promote and provide the relevant technical skills needed for the industry.

Next Steps

NFU Cymru will continue to discuss and share our thinking with our membership, Government and a range of stakeholders. We will look to further develop and amend our policy and framework in the light of these discussions considering in more detail some of the potential policy elements we have suggested, how we chart progress and measure outcomes, consider implementation issues and look to consider other key themes brought up in our member consultation exercise.



British Association for Shooting and Conservation response to a Welsh Government consultation to inform the development of its Natural Resources Policy

13th February 2017

By email to: NaturalResourceManagement@wales.gsi.gov.uk

Executive summary

Shooting in Wales contributes to the sustainable management of natural resources, including safeguarding and increasing carbon stores; improving health and equity through access to good quality green and blue spaces; improving the quality and connectivity of our habitats; and retaining the distinctiveness of our places and historic landscapes.

BASC recommends that the Welsh Government funds the development of shooting sports in Wales to help improve habitat and species management, recreation and food production.

BASC works in collaboration with the Welsh Government and Natural Resources Wales on Green Shoots Invasive Alien Species Control, the Welsh Game Meat project and Greenland White-fronted Goose conservation.

Introduction

The British Association for Shooting and Conservation (BASC) is the largest representative body for sporting shooting with over 148,000 memberships. It aims to promote and protect sporting shooting and the wellbeing of the countryside. It actively promotes good firearms licensing practice, training, education, scientific research and practical habitat conservation. BASC believes that all who shoot should conduct themselves according to the highest standards of safety, sportsmanship and courtesy with a full respect for their quarry and a practical interest in wildlife conservation.

Shooting contributes £75 million annually to the Welsh economy and this supports the equivalent of 2,400 full time jobs in Wales.

Shooting interlinks with other sectors such as tourism. Shooting tourism represents an important boost for rural areas in Wales, which is especially important in tourist based businesses during the 'off season' months.

The management of 380,000 hectares of land in Wales is influenced by shooting sports. The conservation value of shooting in Wales is considerable, as indicated by the fact that the labour put into conservation work from shooting is equivalent to 490 full time workers (<http://www.shootingfacts.co.uk/>). We would like to work with the Welsh Government to increase these benefits.

Ecosystem approach to land management

Shooting sports are an excellent example of how to deliver the ecosystem approach to land and resource management as follows:

Provisioning services.

In terms of provisioning services, BASC is working in partnership with the Welsh Government on The Welsh Game Meat project which aims to identify and evaluate the potential for sustainable short supply chains, local markets and increased sales and consumption of game meat in Wales. We are grateful for the support from the Welsh Government in this project and expect it will encourage additional shoots to develop, bringing with it the multi-faceted benefits of shooting to the sustainable management of natural resources.

Cultural services.

We know that over 450,000 days shooting takes place in Wales each year which provides an indication of how important shooting is for people's appreciation of landscape and biodiversity, recreation, well-being and tourism.

Regulating and supporting services.

The habitat management and creation provided because of shooting in Wales supports these services. We know that the management of 380,000 hectares of land in Wales is influenced by shooting sports. In addition shooting provides species management on land, helping to control pest and predator populations that can threaten biodiversity and the sustainable management of natural resources.

BASC white paper on lowland game shooting

In 2016 BASC released a white paper on lowland game shooting which draws upon evidence to demonstrate the benefits of shooting. For example it highlighted a range of benefits relevant to the sustainable management of natural resources such as its value for the landscape-scale conservation of non-quarry species groups like farmland birds and butterflies.

<https://basc.org.uk/blog/press-releases/latest-news/new-basc-white-paper-highlights-benefits-of-lowland-game-shooting/>

Deer management in Wales

BASC also helped develop the Wild deer management in Wales Action Plan, which helps meet many of the objectives in the Woodland for Wales Strategy. Deer are an excellent example of the sustainable management of natural resources. They are a resource in their own right but their impact on habitats both on and off SSSI can be negative, which requires management. BASC manage a number of stalking schemes throughout the UK and has a proven track record of meeting culls to a high standard whilst providing stalking opportunities for our members. BASC would be keen to develop further stalking schemes and opportunities to manage deer throughout Wales.

Wildfowling in Wales

Wildfowling clubs and their members around the coast of Wales provide all the benefits of ecosystem services and have been particularly active in responding to issues such as monitoring for Avian Influenza. However their targeted action for conservation should not go unrecorded. A recent example is the conservation of Greenland white-fronted geese where all wildfowling clubs are voluntarily signed up to a moratorium on shooting them. In addition BASC and the Dyfi, Mawddach & Dysynni Wildfowler's Association are members of the Greenland white-fronted Goose Partnership who are delivering targeted conservation work for the species in Wales; this work is benefiting from a Welsh Government grant that the partnership is administering.

BASC Wales Green Shoots Project

BASC's biodiversity programme called Green Shoots is also closely allied with Welsh Government through NRW. We have a grant agreement in place to deliver the control of invasive alien species in strategic locations throughout Wales in partnership with our members and other conservation partners. There are two species for control; grey squirrels control both protects reds and trees and control of the American Mink benefits water voles and wider riparian species.

See: <https://basc.org.uk/conservation/green-shoots/green-shoots-in-wales/>

Key challenges for sustainable use of natural resources

The consultation identifies a number of key challenges. Shooting can help address these challenges as follows.

Safeguarding and increasing our carbon stores

Minded that there is a substantial target for afforestation in Wales, BASC would like to underline that non-upland shooting relies upon and is a driver for woodland creation and planting. Shooting is a potential additional ally for Welsh Government to work with on this target

Maintaining our productive capacity

Shooting provides food for those taking part in the sport and others. Developing shooting would lead to an increase in locally produced and sustainable food production and consumption. In addition shooting is a regulator of pests for example grey squirrel which can damage trees.

Reducing the risk of flooding

Across the UK, wildfowling clubs have undertaken numerous managed retreat projects as new intertidal areas are of use to wildfowling clubs. BASC and our wildfowling clubs have the potential to work with Welsh Government and NRW in identifying possible new projects to assist in flood control.

Improving health and equity

Wellbeing is used by policymakers and the Government as an indicator and measure of our quality of life. Sports and outdoor activity are increasingly being recognised as important for their contributions to our physical, personal and social wellbeing. This report summarises results from a survey which investigated the wellbeing benefits people receive from taking part in shooting, beating, picking up, and habitat management. In short shooting makes an

important contribution to the health and well-being among people of all ages, backgrounds and abilities.

See: <https://basc.org.uk/the-personal-value-of-shooting/>

Improving the quality and connectivity of our habitats

Shooting relies on good quality habitat. In addition connected habitat is important to shooting, from a network of woodlands on a game shoot to a pattern of wetlands for people involved with wildfowling. Therefore policies that allow shooting to grow will stimulate improvements to the quality of habitats as well as the quantity of habitat in Wales.

Retaining the distinctiveness of our places and historic landscapes

Shooting has helped shape Wales' landscapes over the centuries, both by providing the incentive to retain habitat and with creating new habitat. Shooting sports can make the creation of habitats desirable and financially viable in locations where it otherwise would not be.

BASC would be pleased to expand on any of the points covered in this consultation response and to meet with Welsh Government staff to help in the development of this natural resources policy.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Ian Danby', with a long horizontal line extending from the end of the signature.

IAN DANBY
Head of Biodiversity Projects
ian.danby@basc.org.uk

Natural Resources Policy Branch
Welsh Government
Floor 1 East
Cathays Park
Cardiff
CF103NQ

13 February 2017

Dear Consultation Response Team

The Countryside Alliance welcomes the opportunity to respond to the Consultation to inform the development of the Natural Resources Policy. We very much welcome the Welsh Government's recognition of the need for a natural resource policy, particularly in light of the UK's decision to withdraw from the European Union.

We would welcome being part of any future policy discussions as we represent many of those who are involved in the management of the natural environment. As process of policy development needs to respond to the changing situation as Brexit plans unfold, in order to ensure that the Natural Resources Wales policy is fit for purpose.

We support the collaborative approach of the Environment Act, the Well-being of Future Generations Act and the proposed Natural Resource Policy, which as stated by the Minister, can deliver for the environment, the economy, and for cultural and social well-being.

We would like to take this opportunity to briefly highlight the contribution made by the shooting and angling communities, whose engagement will be central to the success of the Natural Resources Policy. We would also highlight the contribution, widely acknowledged, that the natural environment can make to the health and well-being of the people of Wales.

Yours Sincerely, _____

Rachel

Rachel Evans
Director, Countryside Alliance Wales

1. Angling

Angling not only delivers benefits for the environment but makes an important contribution to the well-being of people, enabling them to access the natural environment in urban and rural settings. It is also a major economic contributor to local economies.

Angling delivers environmental benefits through anglers' engagement in conservation, ecosystem monitoring and raising general environmental awareness. It also acts as a 'gateway' for people to access green spaces and creates connections with nature.

Anglers and angling organisations help improve aquatic habitats and lead on, or are partners in, a wide range of projects that aim to improve the quality of aquatic and marine habitat. The rehabilitation of existing waterways, monitoring and improving fish and invertebrate populations, and making structural improvements to waters, such as combating bank erosion in rivers, are common examples of the kind of work in which anglers are involved. In the vast majority of cases these activities are carried out by volunteers, although often in conjunction with statutory agencies.

Anglers' involvement in habitat conservation also has wider community benefits such as:

- Removal of invasive plants (such as Japanese knotweed)
- Removal of invasive species (such as signal crayfish)
- Planting of riparian vegetation to improve the function and appearance of natural habitats
- Removal of rubbish from rivers.

As a result of the huge amount of time anglers spend either in, or alongside, bodies of water developing an intimate knowledge of particular waterways, still waters and coastal stretches, they are often the first to report incidents of pollution and change in ecosystems. Feedback from anglers can therefore be a vital source of early warning where environment problems are occurring.

Although much angler-led habitat improvement takes place on rivers, the work of anglers can also benefit still waters and regenerate neglected urban green spaces and restore habitats.

Improving people's understanding of the environment, and encouraging their involvement in monitoring and conservation is essential if the Natural Resources Policy is to be delivered effectively. Angling organisations help deliver more formal environmental education, often incorporating opportunities for student learning outside the classroom. An example of this is The Countryside Alliance Foundation's 'Fishing for Schools' project. The benefit of outdoor learning develops young people's skills as active citizens and stewards of the environment. Research suggests that an emotional affinity with nature and a desire to protect it can be established through positive childhood experiences in the natural environment.

2. Shooting

As with angling shooting also delivers benefits for the environment and for those participating. The environmental benefits resulting from the management undertaken by gamekeepers and others for shooting cannot be overstated in terms of conservation, ecosystem monitoring and raising environmental awareness.

There are 76,000 participants in shooting across Wales and it is worth a staggering 75 million to the economy, providing the equivalent of 2,400 full time jobs in some of the remotest parts of Wales. 380,000 hectares are actively managed by an army of conservationists, people who are involved in shooting and invest a huge amount of their time and money out there on the ground managing the landscape, improving habitats for wildlife and enhancing biodiversity. Where land is managed for the benefit of game, other species naturally flourish. While the majority of shooting related conservation work focuses on moorland and woodland, it is often the smaller projects that can have the greatest biodiversity impact.

Defra has stated that priority habitats require positive management to enhance their conservation status, such as hedgerow and pond creation can be vital for improving biodiversity. Research by the Game and Wildlife Conservation Trust (GWCT) shows that woodland managed for shooting, rather than for commercial timber production, provides a richer and more varied habitat. For example, in the wide rides required for shooting there can be four times as many butterflies as on woodland edge.

The control of pests and predators by gamekeepers also makes a significant contribution to the conservation of vulnerable species such as ground nesting birds like the curlew or lapwing. For example, rats and crows attack both game and song birds stealing their eggs and eating the young. If left uncontrolled they can have a serious negative impact on biodiversity.

It is also worth noting the importance of moorland and that grouse moor management plays a key role in maintaining upland landscapes that are both rich in wildlife and biodiversity. Heather moorland is home to the red grouse, a species that is unique to the UK. Heather moorland is rarer than tropical rainforest and threatened globally, with 75 percent of remaining habitat found in Britain. It is a habitat of international importance, and supports a rich variety of flora and fauna. The loss of grouse moor in Wales has had a negative impact on the environment and consideration should be given to its restoration.

In the last 30 years, grouse moor managers in England have been responsible for the regeneration and recovery of over 217,000 acres of heather moorland. It is also because of their management that more than 70 percent of England's upland Sites of Special Scientific Interest (SSSI) are managed grouse moors, and over 40 percent are also designated as Special Protection Areas for rare birds and Special Areas of Conservation for rare vegetation under European wildlife directives.

For further information please contact rachel-evans@countryside-alliance.org
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Response to the Consultation Informing the Development of Wales' Natural Resources Policy

Introduction

1. Afonydd Cymru (AC) is the umbrella group for Wales and the Marches' six rivers trusts, which include: Clwyd; Conwy and Gwynedd RT; Welsh Dee RT; The Severn RT; Wye and Usk Foundation; Southeast Wales RT and the West Wales RT. Their combined annual expenditure is of the order of £4million and their objectives are to restore the environment and fisheries of Wales's 23 main and 5 smaller rivers.
2. Clearly, our focus is almost exclusively on some of the Principality's essential natural resources, including: clean water; fisheries; biodiversity; soils and trees; protection from non-native invasive species; flood management and the resilience of those sites for which we are responsible.
3. AC's member trusts USP is the hands on delivery of practical restoration and protection of our rivers including non-native invasive weed control, fish passage construction, riparian fencing and tree management, amelioration of acid waters, diffuse pollution control and many other key aspects of environmental care and protection.
4. We pass on the benefits (where they occur) of clean rivers and healthy fisheries through a pan Wales marketing scheme, bringing in a healthy boost to Wales's rural economy. Details can be viewed at <https://www.fishingpassport.co.uk/>

The Consultation

1. Afonydd Cymru is a member of **Wales Environmental Link** and we refer you to the submission submitted by them. We are in complete agreement with all the suggestions in that response made both on our behalf and behalf of other Welsh NGO's.
2. It will be appreciated that AC's trust have access to a considerable amount of data, experience and hands on knowledge regarding the current state and direction of travel of the status of our rivers and environment.
3. However, the consultation asks regarding:
 - The key steps that need to be taken in order to deliver on the priority themes and address the key challenges, and...
 - The barriers that need to be addressed.

4. The data available that relates to the environmental and chemical quality of our rivers and the targets which we fail to reach for our fisheries clearly point to a self-destruct approach to resource management.
5. The first barrier to be addressed therefore is to understand the depth and size of the enormous chasm that separates policy from the reality of managing our natural resources.
6. The second is to answer the fundamental question: **Should the exploitation of one natural resource impact negatively on the exploitation of another?**
7. For example, farming and forestry impact negatively on water quality and quantity, carbon sequestration, and fisheries. There are regulations and regulation-making abilities already invested in Welsh Government, coupled with an adequate grant system for this not to happen.
8. The failure to manage our resources correctly impacts adversely on Paid Ecosystem Approach which many including ourselves regard as essential.
9. The key steps that need to be taken include:
 - Strengthening of resolve to avoid caving in to political pressure from industries and activities that cause pollution and undue resource exploitation or excess carbon usage
 - A natural resource policy that contains a cast iron requirement to deliver on what it promises.
10. Welsh Government is to be commended on its advancing of the concept of Natural Resource management but faces genuine and justified criticism on its delivery to date.



Ymddiriedolaeth Genedlaethol National Trust

A NATIONAL TRUST WALES REPONSE TO THE WELSH GOVERNMENT CONSULTATION 'NATURAL RESOURCES POLICY DEVELOPMENT FEBRUARY 2017

Introduction to the National Trust

As the largest conservation charity in Europe the National Trust is dedicated to looking after special places of Wales forever, for everyone. National Trust has significant land holdings in Wales amounting to 50,000 hectares of countryside and 157 miles of coast. We care for large areas of special habitats such as montane and upland heath and blanket bog. We care for 26,500 hectares of land designated as a Site of Special scientific interest which is 10% of such sites in Wales.

As a whole the National Trust invests something in the region of £80 million in conservation every year, to care for such special places. We don't just want to look after such places we want to share them. Last year we saw an incredible 4 million visit our coast and countryside places. Engagement in our work is furthered through our volunteering programme, through which, last year 5,200 volunteers gave 300,000 hours to our work.

Consultation Response

We are glad to have the opportunity to respond to this consultation. We have four key points framing our input into the development of the Natural Resources Policy (NRP).

1. Place in the wider legislative environment

Given that there are numerous policies and plans that will be published as a result of the Environment Act and the wider Government programme, we would like to see elaboration on how the NRP will fit with the wider legislative environment. It needs to set out how it aligns with the Wales National Marine Plan and other planning mechanisms, such as the Nature Recovery Action Plan, National Infrastructure Commission for Wales, the National Development Framework, the Wales Marine & Fisheries Strategic Action Plan and Technical Advice Notes.

2. Links to SoNNaR

The Environment Act creates a cohesive structure around environmental governance in which SoNNaR, NRP and Area Statements build on and feedback to each other to create a unified approach to managing our natural resources. In this context the NRP should draw on the SoNNaR report as an evidence base before outlining resultant Welsh Government policy. However, we are concerned that the NRP does not draw

on the recommendations of SoNNaR as much as it should. The analysis of ecosystem resilience within SoNNaR should be the starting point for developing policy on natural resources, yet it does not feature much in the document. The ambition for Welsh Ministers should be to recover and restore the availability of natural resources so as to ensure sustainable use.

While we also see the importance of NRP being coherent with the Programme for Government we feel that to benefit from a long term approach to managing natural resources the NRP needs to show stronger links to the evidence base provided by SoNNaR.

There could also be a clearer focus on risks and opportunities for SMNR, including what should be done in relation to climate change and biodiversity, as required by section 9(2) of the Environment (Wales) Act 2016.

3. The need to direct change

We would also like to see further clarity from the NRP on how it will direct change. It is currently unclear what change the NRP looks to deliver and whether this will be delivered inside or outside of Welsh Government and by legislative or other means. There must be some clarity about what needs to be done and the scale and pace of action required. This in turn will require the setting of, and reporting against, targets or milestones to ensure progress towards achieving SMNR can be measured, or a lack of progress recognised and addressed.

There is scope to be clearer what change is needed at Welsh Government level. The consultation document states that the themes are to 'inform sustainable management of natural resources across Welsh Government'; at present there is no indication of how Welsh Government departments should change the way they operate in order to deliver SMNR.

Where change will be delivered by NRW, through Area Statements or by Local Authorities for example there also needs to be thought given to resourcing of these actions at a time when competition for funding within these bodies is high.

4. Responding to Brexit

The Cabinet Secretary identifies the profound implications of Brexit and states the aim to ensure this consultation is a part of the Welsh Government's engagement on shaping the way forward for Wales. We are glad to see this context provided.

The loss of the CAP means the loss of the funding model that has existing in our rural areas for decades and supported the management of over 80% of the land of Wales. We need a new model of Sustainable Land Management in Wales. The approach taken by the Welsh Government in designing a new scheme will be fundamental in whether it achieves its aims of Sustainable Management of Natural Resources. If a new approach establishes a strong regulatory baseline and focuses on the provision of public goods for public money it could contribute greatly to tackling the challenges stated in SoNNaR, around carbon storage, biodiversity loss, water quality, flooding and access.

For this reason we think that the content of the NRP needs to be more clearly focused on building a new policy for farming and fisheries management after the Common Agricultural Policy and Common Fisheries Policy come to an end.

For more information please contact;

Emily Keenan

Emily.keenan@nationaltrust.org.uk

07766820767

Consultation Response Form

Your name: Colin Russell

Organisation (if applicable):

email / telephone number: colin@westwalesbiodiversity.org.uk

Your address: Llabeledog, Llanmill, Narberth SA67 8UE

Question: Written feedback on the priority themes and key objectives within them outlined in this document would be welcome as part of this consultation exercise. In particular, taking into account the legal framework and its requirements as outlined in this document, it would be helpful to receive contributions on:

- the key steps that need to be taken in order to deliver on the priority themes and address the key challenges; and,
- the barriers that need to be addressed.

In my view it is key that the policy instils a joined up approach across Wales. That this is enhanced by the Area Statements which I feel almost by definition, divide the landscape's natural resources. Whilst I appreciate this is not the aim, that these should overlap and that evidence contained in the statements applies across administrative boundaries, I feel it is a potential consequence and may become a barrier to a joined up approach and addressing the key challenges.

Natural resources must be prioritised at the point of action and the resources of those required to deliver on policy and those delivering actions are increasingly constrained. Applying resources through Local Nature Partnerships will bring added value.

Communication is a challenge, not only the wider goals and duties under the legislation, but also how that decisions should address SMNR in the broader sense and look for multiple benefits. Small changes can bring great benefits and might even save money.

Two examples from the consultation document where a joined up approach does not currently happen and address the above are the management of roadside verges and hedges, both providing connectivity for wildlife and contributing to ecosystem resilience.

Good practice in planting and cutting regimes of roadside verges could be applied across the country. Done correctly, road safety need not be compromised. Outcome 1

of the Action Plan for Pollinators already states, “Wales has joined up policy, governance and a sound evidence base for action for pollinators”.

Healthy well managed hedges can reduce the risk of flooding and be managed to provide valuable habitat and forage for wildlife. Allowing growth which provides the latter is not necessarily happening under modern cutting regimes. Additionally mature trees are under threat from disease, old age, and felling. They are not being replaced or allowed to grow through and they will take decades to replace. Wales’ hedgerows will be the sorrier for their loss. Our experience of the rural environment, the distinctiveness of our countryside will be diminished. Applying national policy now would be timely. In neither of these examples am I advocating a return to old labour intensive management, rather a pragmatic approach which could bring multiple benefits.

As recognised in the priority themes, there is already strong growth in the production of higher value added food products in Wales. With a greater diversity of food produced, there ought to be increased opportunities for even further growth. Horticulture plays a very small part in the UK and Welsh agricultural sector. We cannot second guess the future post Brexit, but with Wales already importing more than 50% of the food it consumes, it seems to make sense that we encourage home production as much as possible. Sustainably managed, it could have multiple benefits. Any change to agricultural practices must be a challenge.

Thank you for the opportunity to respond.

If you have any related issues which we have not specifically addressed, please use this space to report them:

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here:

☐

Consultation Response Form

Eich enw: Nerys Wyn Davies, Uned Bioamrywiaeth

Corff (os yn gymwys): Gwynedd Council

Ebost / rhif ffôn: biodiversity@gwynedd.llyw.cymru

Eich cyfeiriad: Uned Bioamrywiaeth, Adran Rheoleiddio, Cyngor Gwynedd,

Caernarfon, Gwynedd, LL55 1SH

Ymateb i Ymgynghoriad i Lywio Datblygiad y Polisi Adnoddau Naturiol

- Yn gyffredinol rydym yn cytuno gyda'r ddogfen ymgynghori ond mae diffyg manylder ar gynnwys y polisiau a sut y byddent yn cael eu creu a gweithredu.
- Does dim digon o bwyslais yn y ddogfen ar werth ein Bioamrywiaeth a sut bydd yn cael ei warchod drwy'r polisiau.
- Mae angen trosolwg clir o sut mae'r ddeddfwriaeth a pholisiau i gyd yn ffitio gyda'i gilydd – ella buasai un diagram o gymorth?
- Does dim llawer yma ar warchod natur - heblaw cyfeiriad at Y Ddyletswydd Bioamrywiaeth newydd a Deddf yr Amgylchedd. Rydym wedi methu atal y golled mewn Bioamrywiaeth yn y gorffennol ond nid oes unrhyw gyfeiriad tuag at hyn o gwbl. Mae angen i'r ddogfen ymateb i hyn yn y polisi yma. Hefyd mae'r ddogfen yn rhoi'r argraff nad oes llawer o gysylltiad rhwng Deddf yr Amgylchedd a'r Polisi Adnoddau Naturiol. Hoffem weld cysylltiad cryfach rhwng Bioamrywiaeth a'r polisi newydd yn cael ei adlewyrchu yn y themâu o flaenoriaeth ac yn sicr fel un o'r heriau i'r polisi.
- Rydym yn cytuno bod Tyfiant Gwyrdd ac elfennau cymdeithasol-economaidd yn bwysig iawn ond does dim llawer i esbonio sut fyddent yn sicrhau nad oes effaith negyddol ar yr amgylchedd wrth wneud hyn. Gall rhai elfennau fel egni adnewyddol a thwristiaeth gwrthdaro gyda chadwraeth natur felly mae angen cyfeirio at hyn yn y polisi gyda meini prawf clir ar sut i ddelio gyda sefyllfaoedd tebyg.
- Mae llawer o son yn y ddogfen am 'Reoli ar raddfa'r dirwedd a lle' er mwyn gwella ein lles. Ond mae prosiect tirlun angen llawer o arian ac ymroddiad i'w gweithredu ac mae nifer o brosiectau tebyg wedi mynd trwy broses cymhleth a hir er mwyn sicrhau'r adnoddau i'w gwireddu. Mae angen i'r polisi newydd gydnabod a chyfeirio at hyn gan esbonio sut bydd y math yma o brosiectau yn derbyn cymorth ariannol yn y dyfodol er mwyn gwireddu'r 'ffordd newydd o weithio'.

English translation.

- In general we agree with the consultation document but there is a lack of detail on the content of the policies and how they are created and implemented.
- There is not enough emphasis in the document on the value of our biodiversity and how it will be protected through policies.
- We need a clear overview of how the legislation and policies all fit together - maybe one diagram would be helpful?
- There's not much here on nature conservation - except the reference to a new Biodiversity Duty and Environment Act. We have failed to halt the loss of biodiversity in the past but there is no reference to this at all. The document needs to respond to this policy here. The document also gives the impression that there is little connection between the Environment Act and Natural Resources Policy. We would like to see a stronger link between biodiversity and how the new policy will be reflected in the priority themes and certainly as one of the challenges of the policy.
- We agree that Green growth and socio-economic elements are very important but there is not much to explain how they would ensure that they do not have a negative impact on the environment while doing this. Some elements such as renewable energy and tourism are in conflict with nature conservation so we need to refer to this policy with clear criteria on how to deal with similar situations.
- There are many mentions in the document of 'landscape-scale management and place management' in order to improve our welfare. Landscape projects need a lot of money and commitment for action and a number of similar projects have gone through a long and complex process in order to secure the resources to be realized. The new policy needs to recognize and refer to this by explaining how these types of projects will receive financial support in the future to bring about this 'new approach'.

Consultation Response Form

Your name: Ieuan Sherwood

Organisation (if applicable): Bridgend County Borough Council

email / telephone number: ieuan.sherwood@bridgend.gov.uk

Your address: Civic Offices, Angel Street, Bridgend. CF31 4WB.

Question: Written feedback on the priority themes and key objectives within them outlined in this document would be welcome as part of this consultation exercise. In particular, taking into account the legal framework and its requirements as outlined in this document, it would be helpful to receive contributions on:

- the key steps that need to be taken in order to deliver on the priority themes and address the key challenges; and,
- the barriers that need to be addressed.

If you have any related issues which we have not specifically addressed, please use this space to report them:

Aligned to the commitments set out in the programme for Government, 'Taking Wales Forward', three priority themes have been identified for the Natural Resources Policy to realise the significant opportunities and address the challenges faced. These are:

- Accelerating green growth by increasing resource efficiency, renewable energy and supporting innovation.
- Delivering nature-based solutions to improve resilience and the benefits derived from natural resources.
- Improving community and individual well being by taking a place and landscape based approach

These priority themes are supported in principle and align with the approaches being taken by Bridgend County Borough Council. However, the issue of terminology and its understanding is an important one throughout the consultation document. Wales is leading the world in many respects in this area of work and those involved or closely associated with it will have a firm grasp of what certain concepts of approaches are considered to be and what they are intended to deliver. A divide does however exist between those who are closely involved and understand the theory and language – although disagreement over its interpretation and application exists- and those who are not closely involved and don't. This means that not only is there a risk of disagreement and misunderstanding but also of alienation. If the way a certain area of work is framed and described only engages those involved with it at an academic or policy level then there is a risk that it may not engage those who will be tasked to deliver it. In many respects it could be suggested that the consultation document could do more to offer a direct line of sight between policy and intended action. Development of this will be important going forward.

Comments relating to each priority are provided below:

- **Accelerating green growth by increasing resource efficiency, renewable energy and supporting innovation.**

An approach towards green growth that encourages economic growth and development and tackles poverty while trying to prevent climate change and unsustainable natural resource use will provide positive outcomes for the communities of Bridgend County Borough. This creates a challenge whereby the intrinsic value of the natural environment may not always be considered in the same way as the value attributed to traditional measures of economic growth, i.e. GDP. Greater clarity relating to what green growth is considered to be may assist in reducing any confusion that might exist and thereby ensure approaches are more aligned to vision and expectations are clear and realistic.

Advances in a circular economy to reduce the impact on our natural resources, advances in a low carbon economy, community renewable energy and sustainable food production are welcomed and link with work already underway in Bridgend County Borough. For example, the Council will be supporting a number of community renewable schemes over the coming years and is the lead Authority for a pan-Wales food supply chain development scheme. As well as the foundations for growth listed, it is suggested that Green Infrastructure as well as its link with priority two may also be considered as a foundation for accelerating green growth.

In addition to resource efficiency a focus should also be on reducing demand for exploiting our natural resources as it could be suggested that success in resource efficiency may actually increase consumption as consumers feel they are having less of an impact resulting no net difference.

- **Delivering nature-based solutions to improve resilience and the benefits derived from natural resources.**

This priority complements the approach taken by Bridgend County Borough Council in relation to Green Infrastructure over recent years and is welcomed. As an example, Supplementary Planning Guidance 19 – Biodiversity and Development a Green Infrastructure Approach aims to change perceptions and view the natural environment as an ‘asset’ which developers can capitalise on in the development process allowing the County Borough to benefit from the economic prosperity of growth whilst protecting and enhancing the natural environment - <http://www1.bridgend.gov.uk/media/227718/final-green-infrastructure-spg-for-web.pdf>

There is however a perception challenge that the performance of green infrastructure schemes are unknown and there are uncertain ongoing maintenance costs. As such, funding sources could be considered to be more inclined to facilitate grey infrastructure solutions that whilst requiring significant upfront costs are considered to have less complicated and lower costing maintenance implications. Changing such perceptions and developing the capacity of organisations to respond to different ways of thinking and working will take time and require investment; developing new ways of thinking and new ways of working will be assisted through collaboration and sharing of best practice from around the world, not just within Wales.

It could be argued that as significant land holders of green space Local Authorities are best placed to manage green spaces on behalf of communities. However, due to the funding context pressure is placed on the ability of Local Authorities to do this. Whilst innovative solutions and approaches can and will be identified, in many cases these have been *despite* the funding context not *because* of the funding context. For this priority to be delivered more holistically across Wales in the long term the funding context needs to be *enabling* rather than *constraining* otherwise impact will continue to be piecemeal and the result of a few rather than many.

Concern exists that the Environment and Sustainable Development Single Revenue Grant may be considered as the sole mechanism for directly resourcing this priority. The scale of that resource and the range of expectations placed upon it would make that insufficient to deliver this priority.

Sustainable management of natural resources particularly within the urban areas is a public health issue and requires a partnership approach with Local Health Boards and NRW to support Local Authorities to strengthen the effectiveness of local strategies for the benefit of the population such as well-being plans and area statements. Bridgend County Borough Council recognises the health benefits of accessing the natural environment and with innovative initiatives such as the love2walk festival, green spaces campaign, nature keepers trail and wellbeing on your doorstep scheme amongst others has delivered positive impacts in relation to this.

- **Improving community and individual well-being by taking a place and landscape based approach**

This priority is welcomed as is the importance placed on considering connectivity and prioritising of actions at scale. It complements the approach taken with the development of ecosystem service mapping based on landscape character areas as part of the Bridgend Nature Recovery Plan. This plan recognises the ability of the natural environment to provide essential services through healthy functioning ecosystems, underpinned by biodiversity. Therefore, it could be suggested that place and landscape based approaches should not be considered as simply connecting up the nature based approaches referred to in relation to priority two. Rather, greater value will come from placing more emphasis on the role of biodiversity, which underpins the structure and functioning of ecosystems, and identifying gaps and prioritising areas where habitat creation or restoration will benefit biodiversity and in turn ecosystems and ultimately the ability to deliver landscape based approaches.

A landscape based approach that takes a strategic view of connecting and restoring habitats will enable more effective prioritising of action in relation to ecosystem services. Embedding such actions into Area Statements and Well-being Plans and taking it forward through local partnerships will therefore enable public authorities to deliver the objectives of both the Nature Recovery Plan and address their Biodiversity and Resilience of Ecosystems Duty.

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here:

☐

Consultation Response

Consultation to inform the development of the Natural Resources Policy

Response from CLA Cymru

February 2017

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CLA Cymru: The Voice of the Rural Economy in Wales

1. One-third of the Welsh population lives in rural areas; in England the same statistic is 20%¹. Our rural economy supports some 459,000 people. CLA Cymru represents the broadest possible range of economic players, rural businesses and service-providers, manufacturers and the supply chain for primary producers and those who provide land as amenity. In Wales rural business totals nearly 105,000² enterprises – remarkably, only 16% of these are defined as *agriculture, forestry and fisheries*, the largest other sectors are in professional, technical, wholesale and retail services. Our members include a large proportion of SMEs.
2. While we participate as experts in agricultural issues, we offer the expertise and the requirements of the whole rural community including issues affecting business concerning planning, investment and economic management, education and skills provision, connectivity and physical infrastructure and social issues which affect the rural economy, such as housing.
3. In Wales CLA Cymru's membership reaches over 3,500 rural businesses. Here we play a full and dynamic part in government and stakeholder engagement. Part of a well-established UK wide organisation, the CLA includes some 35,000 members.

Question: Written feedback of the priority themes and key objectives within them outlines in this document would be welcome as part of the consultation exercise. In particular, taking into account the legal framework and its requirement as outlined in this document, it would be helpful to receive contributions on;

- ***The key steps that need to be taken in order to deliver on the priority themes and address the key challenges; and,***
- ***The barriers that need to be addressed***

CLA Cymru is supportive of the approach to implementing the sustainable management of our natural resources as laid out in the consultation. The National Natural Resources Policy, and wider Environment (Wales) Act, is a key tool to delivering the long-term vision and ways of working identified in Well-being of Future Generations Act for our rural communities.

Rural Wales requires engagement, a long term vision and adaptive, collaborative action; especially with the looming uncertainty of Brexit on the horizon.

The consultation makes clear Welsh Government thinking that the Environment (Wales) Act could be a useful framework to deliver policy and support to our rural communities post-Brexit. CLA Cymru would agree that the Act has the potential and is adaptive enough to fulfil this ambition but would suggest the need for a fresh look at the language of the Act. The Environment (Wales) Act is not about the environment – it is about land-use and the ***sustainable management and use of our natural resources*** for which farmers and land managers are uniquely placed to deliver. It is about achieving ***the right action in the right place at the right time***, an ambition that is not adequately conveyed at present. As a post-brexit framework, there is work to be done to ensure wider engagement and understanding.

CLA Cymru has worked, and continues to work, with members to develop a vision for how the Environment (Wales) Act could fulfil its role as a post-brexit framework. Our consultation response will lay out current thinking on this vision looking at the specific role of the Act and its place in the wider policy landscape.

The CLA vision is based around two core principles: **Investment in Land** and **Investment in People**.

The first half of our response will detail how investment in land can be delivered through natural resources management and the Environment (Wales) Act. The second half of our response will look at Investment in People through a dedicated Rural Economic Development Strategy. While we are wholly supportive of the principles laid out, feedback from our members reminds us of the importance of the viability of land based and farm businesses in being able to deliver public benefit. – ***„You have got to be in the black to deliver the green’***

¹ Welsh Centre for Health, Profile of Rural Health in Wales, 2007

² P4-5, Standing Up for Rural Business

NNRP Priority Themes

1. CLA Cymru supports the priority themes as laid out in consultation. There is a need to acknowledge, however, that the scope of the Environment (Wales) Act is now misleading. The consultation, and underlying Welsh Government ambition for delivery of the Act following the Brexit referendum result, is far wider than the title of the Act or consultation suggests and CLA Cymru are concerned about failures to engage wider audiences to realise the potential that implementation of the Environment Act could deliver. This is about delivering sustainable land management – from an economic, social, cultural and environmental perspective. We must not let the title of the legislation mislead all our efforts into environmental enhancement.

Green Growth

2. The principle of Green Growth as laid out in the consultation offers a good starting principle to sustain and develop our thriving rural communities. As a concept for delivering change and transformation, there is a need to strengthen the hard economic side of green growth.
3. As our urban centres embrace city deals, and local authority reform seeks to regionalise economic development, there is concern that the rural “middle” will miss out on this strategic approach to investment in economic development and we seek further clarity as to how this will be delivered post Brexit. The rural economy should be seen as a significant opportunity in Wales with the scope for considerable growth. CLA research has found that in 2012 £1 billion was invested in rural Wales. Insight analysis shows that, with favourable conditions, this could be almost doubled by 2020. The value of this demonstrates how valuable the rural economy and rural businesses are to Wales and if harnessed would place rural Wales at a strong economic footing.

Nature Based Solutions

4. CLA Cymru is supportive of the model of delivering nature based solutions as laid out in the consultation. Past experience of government schemes have taught us that prescriptive, inflexible incentives or solutions do not deliver the scale or extent of benefits that can be achieved through more outcome focused, locally tailored mechanisms.
5. Going forward, we need to re-establish a relationship of trust between the landowner and the government. The success of the Nature Fund and interest in the Sustainable Management Scheme demonstrates that custodianship that landowners and farmers have for their land and natural resources and the strong appetite for delivering beneficial change from a bottom-up approach. There is scope to extend this facilitated collaborative way of working beyond the current scheme.
6. Learning should also be taken from agri-environmental schemes. The consultation on the future of Glastir in 2014 suggested that Glastir Advanced could move towards delivery on a more collaborative, landscape scale basis. CLA Cymru were supportive of this change and suggest that there is a wealth of knowledge and understanding that should be brought forward from the long history of agri-environmental schemes in Wales.

Improving Community and individual well-being

7. CLA Cymru supports the principle of working from a place or landscape based approach in delivering both aspects of our future vision: investment in land and investment in people.
8. Whilst improving community and individual well-being is an important driver at the heart of the Environment (Wales) Act and Well-being of Future Generations Act, it is important to remember that real growth and investment for the rural economy and community can only

be sustainably delivered through private enterprise, landowners and land managers. Redistribution of wealth alone, is not sustainable.

Key Challenges

9. The challenges laid out in the interim National Natural Resources Policy of 2015, and subsequently supported by the State of Natural Resources Report, are still relevant. CLA Cymru would support the broad outline but suggest that some areas for clarity and strengthening of language are necessary. This is especially relevant if the NNRP is intended to provide the framework for the post-brexite world.
10. Successful sustainable management of natural resources (SMNR) is reliant on the rural landowners, managers and farmers who manage 80% of the land. Without these individuals and rural businesses, our natural resources would soon deplete. It is fundamentally important that our agricultural and land-based rural businesses are profitable and productive to that current and future generations can aid in successfully delivering SMNR. We need to maintain what we have now to the benefit of what we hope to have in the future.
11. CLA Cymru would suggest an inclusion in the NNRP that recognizes that a **competitive, productive, sustainable agriculture and land-use sector in Wales** is essential in delivering against many of the challenges identified in the Policy. It is the only gateway to deliver wider public benefits.
12. Ministers must also have regard for the fact that many of the challenges already identified are on the cusp of emerging private markets for payment for ecosystem services. While still early days, it is essential that these markets are not hampered by conflicting government interventions as they offer the best long term solution for delivering the benefits envisages.
13. Safeguarding and Increasing carbon stores: Climate change is an important global challenge to address. There is significant potential for beneficial activity in the land-use sector however to date much of this activity has failed to take place due to conflicting or un-complementary regulation. If government hope to achieve significant inroads into meeting carbon saving targets in line with their international obligations, there is a need to streamline and align regulation behind this ambition.
14. Maintaining out productive capacity: Our productive capacity in terms of natural resources is the foundation of many rural businesses so is a key challenge to address. It is important that we don't lose sight of the fact that many rural businesses and communities rely on the sustainable use of our natural resources.
15. Reducing the Risk of flooding: CLA Cymru recognises the potential to make a positive difference to flood mitigation through land management practice and considers this to be something of considerable public value. Moving away from hard engineering will in the long run save money for the public purse and should be seen as a value for money investment.
16. Improving health and well-being through access good quality green spaces: Connectivity between rural and urban Wales is seen as important for the wellbeing of society. Wales has an extensive network of Public Rights of Way. Many of these are underutilised and degraded due to lack of funding for maintenance. Use of existing paths conclusively demonstrates that the public want a certain type of access – one with car parking and amenities. Farmers and land owners are well placed to offer opportunities to achieve this

public good – working with the community to develop best practice voluntary agreements will be key.

17. Improving the quality and maintaining the availability of water: Water is one of our most valuable resources in Wales and we must take a sensible approach to managing it for the long term. CLA Cymru fully support interventions towards achieving this goal.
18. Retaining the distinctiveness of our places and historic landscapes: The landscape of Wales has been created through active management. It is a history of farming and rural communities that has changed significantly over decades and centuries. CLA Cymru supports the need to retain our distinctiveness landscape but would emphasise that this aim should not be met at the expense sustainable rural economic development. Our landscape must evolve with societies changing needs. It cannot remain in aspic

Delivery against the challenges

19. CLA Cymru is currently consulting with members around the development of a framework model of **public money for public benefit**, which we believe could work for delivery against the challenges laid out in the NNRP. Successful delivery of a public goods model will require behavioural change and a redefinition of the relationship between land managers and the public / government
20. In particular, Brexit, gives us the opportunity to shape this new relationship to one based on reciprocal expectations and obligations. This could be delivered through our concept of a “**land management contract**” which would give all farmers and land managers access to a payment for delivery of public goods as envisioned in the NNRP.
21. Key characteristics of land management contracts:
 - **A choice not an entitlement** – any farmers / land manager seeking to receive payment of public money would sign a contract that set out the expectations they will meet in return for payment
 - **Universally available** – every farmer / land manager would have the option to sign up to a contract irrespective of size, type of farm or landholding or location where it is identified that public benefit can be delivered.
 - **A tailored contract** – land managers will have input into developing the features / practices / activities to deliver public benefit in their contract.
 - **A transparent system for valuing each contract** – the value of payment should equate to the obligations that extend further than the minimum requirements set out in law with regard to the way they farm and manage their land.
 - **Penalties for breach of contract** – contract deductions clearly set out on a scale up to permanent withdrawal of contract.
 - **Expectations on Government** – as a party to the contract, that Government would be agreeing to meet defined standards in terms of paying on time and transparency and fairness in inspections.
 - **Contract terms** – defined duration and appropriate mechanisms for amendment and break clauses.
 - **Payment to provider of public good** – this could be the landlord, tenant or both depending on the circumstances.
22. Contracts could be built from a menu of public goods. In Wales this would likely be identified in the Area Statements in accordance with the key challenges identified in the NNRP.
23. These are developing thoughts and we would be happy to share with Government as our thoughts develop.

Area Statements

24. Area Statements should follow the structure laid out in the NNRP, providing evidence of local ability to deliver public benefit identified at the national level whilst remaining flexible enough to allow local knowledge to supplement delivery or widen the scope of opportunity.
25. Welsh Government will have to adopt a more active role in area statements than initially envisioned by the Environment (Wales) Act if the legislation is to be used as a framework post-Brexit.
26. Feedback from a recent CLA workshop on Area Statements revealed the complexities that such a multi-disciplinary approach to land management will bring and raised concerns from landowners and managers that their interests, as those with control of the land may be overlooked in the wider priority setting process. We will continue to work with NRW to ensure that the voice of private landowners and managers is heard in this process.
27. CLA Cymru eagerly anticipate the work of the Future Landscapes ground and understanding how this fits within the Area Statements structure – further understanding is essential to understand how National Park Management Plans will integrate with Area Statements.

State of Natural Resources Report

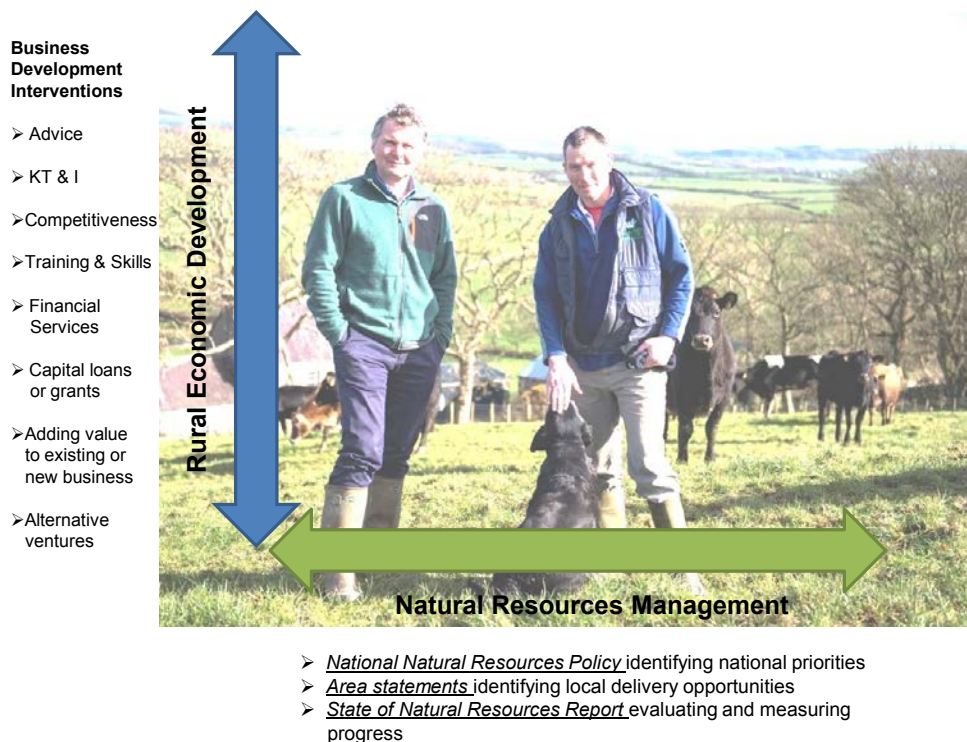
28. We envisage that SoNaRR would continue to monitor and evaluate progress to inform every iteration of the National Natural Resources Policy and Area Statements.

If you have any related issues which we have not specifically addressed, please use this space to report them:

29. In parallel to investing in the land, CLA Cymru recognizes the need to set NNRP in the context of rural economic development. While farming and land-management is the backbone of rural communities, the networks and structures of rural businesses support a plethora of additional enterprises which in today's world are wide and varied. Green growth for our rural communities cannot be achieved through investment in land alone. The need for profitable, viable land based businesses is essential to enable the sustainable management of our natural resources but government intervention must go beyond this.
30. Current CLA Cymru vision for delivering the ambition laid out in this consultation consists of two axis based around Investment in Land and Investment in People:

Investment in Land – Natural Resources Management Investment in People – Rural Economic Development Strategy

Public Money for Public Benefit



31. We believe that a dedicated Rural Economic Development Strategy that straddles the divide between the Rural Affairs and Economy departments of Welsh Government is essential to deliver sustainable economic growth. This could draw on the hard discipline of jobs created and sustained often seen in economic renewal whilst recognizing that in rural areas, proportionally smaller developments can have more significant and long term sustainable impact on a rural community. We would envisage this as a counter-weight to the current discussions on city regions and urban focused economic regeneration. This would align well with current Welsh Government thinking around a place based approach to economic development.
32. Whilst green growth is important, the consultation also fails to consider the wider levers that are available to create an environment of growth. For example, making the most of renewable energy and tourism, making the most of a positive planning system and a tax regime that supports long-term investment in sustainable rural business decisions. Whilst some of these policies are outside the scope of Welsh Government, a number are within control of Welsh Ministers and we should urge a holistic approach is taken for economic development that brings together all government departments to influence positive change.
33. At its core, agriculture is a commodity business and ensuring strong and reliable markets for our produce is key in the post-Brexit world. Productivity and competitiveness are essential for our sector. This may require adaptation to current farming practices and re-evaluation of how we use land. This support must complement the payments for public goods and not be seen as an alternative. Medium term support may be required to aid farmers in adapting to these new market conditions but the long term aim must be to achieve a thriving competitive land based sector. This may be in the form of transitional support structures.

Conclusion

34. Whilst the concept of delivering public goods is important along with the rural economic development support packages behind this, we have to be realistic and recognize that for commodity sectors like farming and forestry competitiveness, trade and markets are essential. It is rightfully said that you have to be in the black to deliver the green and getting this balance is essential for successfully delivering natural resources management in Wales.
35. Whilst CLA Cymru supports what is outlined in this consultation and the general ideal of delivering public goods for public money, we look forward to understanding how these proposals fit together and taken forward in the context of a UK framework to work with the rest of the UK for cross border businesses so that they are not adversely effected by geography. We urge Welsh Ministers to ensure that in bringing together the framework, the needs of rural Wales are fully heard.

Consultation to inform the development of the Natural Resources Policy

Consultation Response Form

Your name: Andy Rowland

Organisation: **Dyfi Biosphere Partnership**

email / telephone number: andy.rowland@ecodyfi.org.uk
01654 703965

Your address: c/o ecodyfi, Y Plas, Machynlleth SY20 8ER

Question: *Written feedback on the priority themes and key objectives within them outlined in this document would be welcome as part of this consultation exercise. In particular, taking into account the legal framework and its requirements as outlined in this document, it would be helpful to receive contributions on:*

☐ *the key steps that need to be taken in order to deliver on the priority themes and address the key challenges; and,*

The Partnership is very supportive of the process being followed in Wales to improve the sustainable management of our natural resources, and continues to offer its good offices as a governance mechanism - to encourage and facilitate both collaboration and innovative piloting of actions and approaches. This is very much in line with our mandate from UNESCO to be a learning site for sustainable development.

The Partnership wishes to emphasise the fundamental role being played by farmers in managing natural resources, and urges Welsh Government and partners to engage more directly and deeply with the agricultural sector. Successful implementation of the Policy and of the subsequent Area Statements will require true partnership with farmers; seeking their enthusiastic participation in delivering a range of ecosystem services, alongside appropriate control of the risks to ecosystems identified in the consultation document (for example, pollution).

The critical role played by small family farms was underlined in our discussions, not only environmentally but culturally (the backbone of Welsh speaking community in rural Wales) and economically (bearing in mind indirect expenditure in the rest of the local economy).

When balancing proposals for renewable energy schemes against protection of local habitats, the imperative of mitigating climate change should be given greater weight than often appears to be the case.

The Biosphere is especially keen on the third theme, seeing great potential for greater use of the natural environment for recreation and relaxation. While the visitor economy often comes first to mind with this theme, it is equally important to explore more thoroughly the very real health and well-being benefits of being outdoors. The Partnership would like to test the suggestion that these benefits are tangible enough to warrant part of the health budget being diverted from treatment to prevention, in line with

the Well Being of Future Generations Act. A pilot project building on past projects run by the Countryside Council for Wales and The Sports Council for Wales (Mentor Allan) could collect the evidence required to make such a re-balancing, especially for good mental health. Attention is drawn to the work of the Natural Health Service network coordinated by the Pembrokeshire National Park Authority, and to the emerging Dyfi Ecotherapy Network. Also to the Green Health in Practice workshop being organised by the Mid Wales Health Collaborative on 16th March.

☐ *the barriers that need to be addressed.*

Lack of electric vehicle charging points in rural Wales. There is insufficient attention paid to sustainable travel options in the document.

Weak capacity in the local electricity Grid, often making it difficult to connect distributed generation. Active Network Management and other innovative ways to address this need to be brought in more quickly, with Welsh Government engaging with Ofgem.

If you have any related issues which we have not specifically addressed, please use this space to report them:

For information: The area was awarded Biosphere Reserve status by UNESCO in 2009. The Dyfi Biosphere's vision connects care for natural resources, such as water and the environment, with local inhabitants, their language, culture and heritage, and with a more sustainable local economy. It operates through partnership, fostering collaboration for sustainable development in the public, private and community/voluntary sectors.

www.dyfibiosphere.wales

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here:

13/2/2017

Consultation Response Form

Your name: Andrew Stumpf

Organisation: Glandŵr Cymru - the Canal & River Trust in Wales

email / telephone number: andrew.stumpf@canalrivertrust.org.uk

07710 175070

Your address: The Wharf, Govilon, Abergavenny, Monmouthshire, NP7 9NY

Question: Written feedback on the priority themes and key objectives within them outlined in this document would be welcome as part of this consultation exercise. In particular, taking into account the legal framework and its requirements as outlined in this document, it would be helpful to receive contributions on:

- the key steps that need to be taken in order to deliver on the priority themes and address the key challenges; and,
- the barriers that need to be addressed.

If you have any related issues which we have not specifically addressed, please use this space to report them:

Thank you for the opportunity to comment on Wales' Natural Resources Policy.

The Canal & River Trust is a company limited by guarantee and a registered charity. When it was formed in 2012, taking on the assets and responsibilities of British Waterways, it represented the largest transfer of public assets to the third sector ever.

Glandŵr Cymru is the Canal & River Trust in Wales. Our work in Wales is guided by Bwrdd Glandŵr Cymru chaired by Nigel Annett, Trustee.

The Trust cares for an extraordinary collection of waterways in England and Wales, holding them in trust for the nation in perpetuity. This includes 2,000 miles of working canals and river navigations, docks and 72 reservoirs; the third largest collection of listed buildings and structures in the UK (c.2,700 in total) and 500 miles designated within conservation areas; 63 Sites of Special Scientific Interest; over 1,000 wildlife conservation sites; one and contributing to a further four UNESCO world heritage sites; the national waterways collection and archives and its museums.

Our waterways offer easily accessible activity and recreation, or quiet contemplation to de-stress, and support wider economic regeneration, educational, health and tourism benefits close to people's homes.

Over 50% of the population of England and Wales live within 5 miles of one of our waterways and many of those people live among the most deprived communities in the UK.

Through the actions of our staff, volunteers and supporters we can ensure that "living Waterways transform places and enrich lives" (dyfrffyrdd bywiol i harddu ein byd ac i lonni'r enaid).

Our waterways provide easily accessible green/blue infrastructure for the people of Wales and have a strong role as a visitor attraction bolstering tourism income. See the attached 2015 report by Peter Brett Associates.

Glandwr Cymru fully supports the vision for better management and use of natural resources and we are currently working with Welsh Government, assisted by the Green Infrastructure Investment Fund, on a demonstration project on the way to embed the principles of Sustainable Management of Natural Resources and the ways of working in the Wellbeing of Future Generations Act within our management of the waterways, piloting on the Monmouthshire & Brecon Canal.

Our waterways provide easily accessible green/blue infrastructure for the people of Wales and have a strong role as a visitor attraction, bolstering tourism income, and as a catalyst for wider economic and social changes. *See the attached report by Peter Brett Associates.*

Waterways are also well suited to helping address some of the challenges identified in the State of Natural Resources Report especially:

- Ecosystem resilience (through providing a connecting corridor and as part of the well-managed public estate);
- Improving optimisation of ecosystem services (through positive management of waterway habitats; linking public and private spaces; creating opportunities for tourism and recreation); and
- Ongoing measures to improve the condition of designated sites on and around our waterways (Montgomery Canal SAC, River Usk SAC).

We believe that the challenges outlined in the 2015 interim Natural Resources Policy Statement are the right ones for Wales to be addressing

1. Accelerating green growth by increasing resource efficiency, renewable energy and supporting innovation

- We have been collaborating for several years with a range of private, public and third sector partners to develop the evidence of impacts of abstraction and barriers to fish migration and spawning at different river flow conditions and to improve efficiency in employing water resources. The scale of the work covered the Wye and Usk catchments and took into account the interconnection between the ecosystems of the River Usk SAC and the canal. Through this work, jointly funded by Glandwr Cymru and Welsh Water, we have developed a sustainable solution which would allow an improvement in the conservation value of the river, maintain public water supplies and navigation on the canal (in all but the most extreme drought) which itself is a substantial social and economic public benefit and a valuable part of the area's natural resources. Case Study is attached.
- Across Wales and England, we are seeking to actively develop hydropower opportunities on our assets as a way of generating clean energy; to increase our income for reinvestment in improving the public benefits our waterways provide; and as a way of funding reasonable improvements in fish passage.

Key steps / barriers:

1.1 Market imperfections mean that we need to continue to encourage and support resource efficiency through a combination of economic instruments and regulation.

While we agree changes are needed in some areas and new ideas should be encouraged, there is also an issue of creating suitable market conditions for proven ideas – supporting what we know works against market inefficiencies. Natural resources must be appropriately priced in real terms to drive economic incentives for efficiencies (this is the challenge of Payment for Ecosystem Services especially for public bodies who cannot raise charges to reflect the real costs of their resource use; and for use of public goods).

An example of such market imperfection is in the regulation of water abstraction, where water companies have a mechanism for increasing costs on the public to fund environmental improvements but other abstractors, including public bodies, do not and are currently threatened with losing access to water – even where this abstraction is for a public benefit.

1.2 Ensure regulators and other public bodies make decisions in a strategic manner - taking into account the full range of objectives under the Policy not just a single narrow regulation or target.

An example of potential conflict that should actually be an opportunity is the regulation of hydropower development vs the aim of improving fish passage through migration barriers. Hydropower development provides a clear opportunity to help fund improved permeability for fish passage as well as delivering low-carbon energy. However our experience elsewhere is that

existing regulations are often interpreted as treating hydropower as if it is only a new potential adverse impact on fish movement.

2. Delivering nature-based solutions to improve resilience and the benefits derived from natural resources

- We are currently working with Welsh Government through the ESD Green Infrastructure and Capital funding to enhance the habitats of the Monmouthshire & Brecon Canal and embed a change in future management to improve resilience across all our waterways; This is looking at habitat condition rather than species diversity and takes account of the wider economic and social benefits (Ecosystem Services) that the waterway provides as well as the biodiversity.
- We continue to invest in the regeneration of the Montgomery Canal under the Conservation Management Strategy to ensure a sustainable future for the whole canal including the SAC and unique built heritage assets in Wales.

Key steps / barriers:

- 2.1 Establishing markets which reflect real costs: as in (1.1) above, nature-based solutions depend on environmental costs being reflected in real term pricing and in supporting emerging markets that deliver desired outcomes. This means properly pricing Natural Capital and supporting Payment for Ecosystem Services markets through economic instruments – the plastic bag tax is an excellent example of this in action.
- 2.2 Decision making tools should prompt the right decisions: similar to (1.2) above. An example from within our work is the use of Environmental Appraisals for all our activities to not just ensure compliance but build in prompts to project development to ensure that a wide range of issues (not just natural environmental) are considered and a way to communicate key aims / required practices.
- 2.3 Set the right targets: Our aims should not solely be around rigidly protecting and restoring habitats where they exist now – that is potentially not a resilient strategy in the face of climate change. Instead we should be looking at net improvements in habitat / species presence and condition across Wales as a whole to allow for opportunities to create improvements adjoining existing areas and in corridors for expansion and movement at a landscape scale.

An example of this would be the need for more flexibility in the boundaries of designated sites – such as is proposed for the Montgomery Canal SAC – to allow for a net improvement in the overall habitat or population of protected species rather than red line defence of a site boundary.

3. Improving community and individual well-being by taking a place and landscape based approach

- Our waterways already perform a landscape-scale role as connecting blue/green corridors. We are working with Welsh Government on how this existing natural connectivity can be enhanced

to deliver bigger, better, more and connected resources as well as looking for opportunities to create additional linkages physically and with partner programmes.

- We also have an increasing role in community engagement, driven by our transfer to charitable Trust status in 2013. We now have over 170 “Adoptions” across Wales and England where local communities are taking on responsibility for managing their local waterways. Our aim is to build sustainability in these natural, built and social assets to the point where Canal & River Trust and those beneficiary communities share responsibility for their upkeep. A good example of this in Wales is the Llangattock woodland where the local community have improved the quality of the local resource, for example by removing non-native species and bringing coppice back into management, and generating biomass from their activities and in doing so generate an economic, social and environmental output.

Key steps / barriers:

- 3.1 Coordinating partner action on these themes – there remains a challenge in coordinating actions by many organisations / individuals / sectors as there is currently a multiplicity of partnerships and working groups on various themes. Existing groupings should be brought together under the Policy rather than new, additional arrangements being created.
- 3.2 There also needs to be a clear reporting framework for outcomes that doesn't just resort to artificial economic valuation as a common denominator: – we are currently developing such an outcomes measurement framework for our waterways with Cardiff University and are keen to share our proposals with Welsh Government and Natural Resources Wales.

Cultural change

The aim of the underpinning legislation was to change the way decisions are made in Wales to embrace economic, environmental and social outcomes. To promote this cultural change we believe there needs to be a process of education to encourage behaviour change including:

- **Exemplars** that embody the approach to enable others to see what the ways of working mean in practice. A number of current examples appear to us to be projects with a single purpose / benefit that have taken on board aspects of the approach rather than embodying the approach from the outset. Examples that do embody the approach are Welsh Water's Greening Grangetown and our own Monmouthshire & Brecon canal project.
- **Consistency** from Welsh Government and its agencies demonstrating the different approach. It may be that decision making models and processes need to change to ensure equity, economy and environment are seen to be taken into account and gain from the decisions taken.
- **Celebration** of exemplars through newsletters, stories, and potentially awards which reflect the best of the new approach but clearly show what is expected. Examples should be encouraged from the private, public and third sectors.

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here:

☐

Your name: Gareth Davies

Organisation (if applicable): Coed Cymru

email / telephone number: 01686 650777 garethd@coedcymru.org.uk

Your address: The Old Sawmill, Tregynon, SY16 3PL

Question: Written feedback on the priority themes and key objectives within them outlined in this document would be welcome as part of this consultation exercise. In particular, taking into account the legal framework and its requirements as outlined in this document, it would be helpful to receive contributions on:

- the key steps that need to be taken in order to deliver on the priority themes and address the key challenges; and,
- the barriers that need to be addressed.

If you have any related issues which we have not specifically addressed, please use this space to report them:

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here:

☐

1. Coed Cymru is dedicated to support the protection, use and enhancement of woodland in Wales. Our response is focussed on woodland and trees within the wider landscape context. We have been facilitating woodland creation and management in Wales for over 30 years, preparing over 7,000 management plans covering more than 35,000 ha of new and existing woodland. For over 20 years to support this work, we developed a series of collaborative innovative research projects focussed on timber and the role of trees in the landscape.
2. We welcome the opportunity to respond to this consultation as the first step to implement new legislation in an increasingly challenging context. We broadly support the 3 priority themes and agree with the 7 key challenges and offer suggestions to inform the implementation of these to deliver the Environment Act and the WFGA.
3. We would like to see clearer guidance emerge as to what action against the themes and challenges might look like and to inform future delivery mechanisms. Better integration across government is also required to move forward and the NRP should provide the context for this. We need to avoid another Pillar 1 woodland removal exercise. It might be useful therefore to outline in the structure diagram where other WG policies fit in.
4. The role of the NRP is 'setting out the key risks, priorities and opportunities for SMNR, in relation to biodiversity and climate change and the Ministers policies for SMNR'. One of the main pressures on biodiversity is the use of land to generate economic activity, and one of the key threats to rural communities/incomes is climate change. A key element in this document should be to better understand what resilient 'green growth' looks like and to ensure that it is achieved through actions that increase biodiversity and deliver *across* the 7 key challenges.
5. It might be useful therefore if the NRP document made specific reference to resilience in the main text and in particular prioritised actions that achieve outcomes *across each* of social, environmental, cultural and economic factors. This would help the document achieve a balance in setting out how for example, 'maintaining productive capacity' could be achieved in a way that leads to multiple benefits, including enhancement of biodiversity. This would allow us to better compare options to achieve optimal land use at a landscape scale, informing concepts such as 'PES' or future support for public goods.
6. It might also be useful for the document to outline what SMNR means in the context of the Environment Act and Ministers responsibilities: 'using natural resources in a way and at a rate, taking other action to promote, and not taking action where it would hinder the achievement of the following objective: to maintain and enhance the resilience of ecosystems and the benefits they provide, and in so doing a) meet the needs of present generations of people without compromising the ability of future generations to meet their needs, and b) contribute to the achievement of the well-being goals'. Working to this legal definition will require changes to existing land management practices, particularly in respect of enhancing resilience of ecosystems and it would be useful to clarify further in the document what this means.
7. In particular, we need more examples of increased economic value derived from sites that deliver 'high nature value'. Bringing more native woodlands into management for multiple objectives would be an example of this, or growing a proportion of higher value timber (of any species) by 'closer to nature' approaches should receive priority in the NRP delivery. Greater resilience might require increased vertical integration of supply chains, to add more value to natural products in Wales, and/or horizontal integration to maximise GVA at a landscape level and this is recognised under 'resource efficiency and innovation'.
8. How we measure progress might also be considered in the document. For example, 'maintaining our productive capacity' might comprise a number of indicators. In forestry, the main indicator is volume of timber harvested and SONARR highlights concern about falling timber volumes. However, volume is only one of the contributors to 'gross value added' which is the driver of

economic growth. At a high level, *volume x value* generates GVA, and a focus on *both* is necessary. We need a better understanding of value measures, which is returned to below. This is important in the context of SMNR as increasing volumes of softwood timber could pose a clear threat to the condition of woodland and other habitat eg: the threat to ancient woodland features in plantations on ancient woodland sites. We are fully supportive of increased woodland area, where achieved 'resiliently'. The NRP should set out the context to guide us in this direction.

9. Considering the landscape scale, we also need better tools for measuring the impact of woodland *beyond the woodland edge* to provide a better measure of ecosystem resilience and value for money. For example trees within the farmed landscape offer the following impacts to productivity:
 - Sheltered sheep show a 21% increase in live-weight (5year trial). (Lynch and Donnelly, 1980).
 - British sheep require 19g of feed per day to thermoregulate at 6°C but only 8g at 25°C. Increasing temperatures and reducing wind chill by use of shelterbelts could significantly reduce feed costs. Research is on-going by Bangor University Multi-land project.
 - Protected areas have shown a 20% increase in average annual pasture growth. (Fitzpatrick, 1994).
10. Such gains, when replicated across more farms, could significantly support the £385m GVA generated by farming while providing a range of other benefits from soil and water to habitat connectivity, measurably increasing the resilience of the landscape.
11. We therefore believe the best way forward to deliver against the NRP is to move towards optimising land use options at a landscape scale. Moving beyond a focus on 'one land use vs another', we would aim to deliver an optimal combination to achieve a greater overall benefit. The intrinsic value of nature needs equal representation within these decisions as part of resilience and as our landscape and biodiversity have evolved with human intervention over millennia creating a 'mosaic' landscape (UK NEA), one land use type is therefore unlikely to provide all the answers. It will be the role of the NRP to provide the context for this and we do not believe that the Area Statements process should be left alone to this task. Optimisation should be a key policy goal.
12. The Glastir Monitoring and Evaluation Plan contains some good tools and approaches for evaluation, but it only measures what Glastir has delivered. We need to go beyond this and measure the potential of the landscape to deliver optimal 'ecosystem services' and move towards better information and tools to aid decision making. The NRP should outline this as a key need/barrier to implement the policy against which to measure progress.
13. Optimisation will also require new skills and knowledge of practitioners, and particularly more people who possess expertise across land uses. Ultimately the success or failure of the NRP will depend on people on the ground carrying out appropriate work and those advising and supporting them. We need to develop a wider knowledge base concerning ecosystems and landscape scale impacts, outside traditional functional and professional boundaries or arguments centred on one land use vs another.
14. The Glastir Woodland Opportunities map is an attempt towards consensus. But it is currently structured as a spatial map, bringing together those who want to create woodland/forestry, with those trying to stop it. We need better conversations, *led by Government*, over what is appropriate and where optimisation could be achieved. The NRP will be the starting point in this and again, the themes of optimisation and resilience are key. Someone must ultimately be tasked with the responsibility for *making a decision* in a more efficient way than is currently possible for woodland creation. It is too easy for lobby groups to take up 'crisis' positions without being involved in constructive discussion.

15. We, and many others, have demonstrated that integrated land use is possible, achievable at scale and that landowners are prepared, often enthusiastic, to make positive changes. We need to be given better tools to do this job and mechanisms that involve rural communities in SMNR to realise multiple benefits across economic, environmental, social and cultural resilience. The latter might favour change that comes from within Wales over change imposed from outside, through for example the sale of farms and land to inward investors/NGO's etc.
16. The NRP might therefore more strongly recognise the role of Welsh rural communities in SMNR, for example that Welsh Government might expect to prioritise land use change where it offers direct investment opportunities and returns to local people, supporting social and cultural resilience. This is in line with the Cabinet Secretary's introduction which emphasises 'maximising our competitiveness, underpinned by high environmental, human and animal health standards, to support profitability and resilience of our key sectors'.
17. The NRP document might also clearly outline the characteristics of delivery mechanisms that will deliver the policy. This would provide some guidance post-Brexit. In particular, there needs to be clarity over where public funding should contribute to public good, where private funding ('PES') might provide a greater role and where regulation is the most appropriate policy tool.
18. We support the emphasis in the document towards the implementation of 'ecosystem scale' approaches to land management. However, we must take care in implementing the strategy not to (i) dilute the restoration of protected sites and other sites of high nature value and (ii) to recognise the challenge this poses for delivery mechanisms to take account of both macro and micro scale drivers. Our support systems should also achieve better landowner participation if they are to work across an ecosystem scale. The Glastir Small Grant Scheme is a welcome step in the right direction, increasing landowner engagement, but it requires an additional level of coordination and support at a catchment/landscape scale to achieve the wider potential required by the NRP.
19. Bringing undermanaged woodland into management could provide a significant source of renewable energy. While the yield class (volume) of broadleaved woodland is typically lower than coniferous species, the dry weight and calorific value is higher, which offsets this to some degree. As part of a range of markets for woodland output, fuelwood is increasingly important. The main barrier in many woodlands is fragmentation and achieving scale through cooperation and collaborative marketing will be necessary. While the RHI scheme raises some concerns it has resulted in renewed interest in woodland management that can be built upon.
20. Action under the NRP should be based on sound information from verifiable peer-reviewed sources. Not all woodlands deliver the same benefits, the species, location and management options will determine the level of eco-system services/impacts delivered. Achieving optimisation in land use will require better data and use of data.
21. GVA figures for 'agriculture' and 'woodlands' are given in SONARR (and repeated in this consultation document). If we are to make sensible decisions about NRP implementation we need to understand these figures:

'Wales' natural resources provide us with many economic, social and cultural benefits. For example:

£385 million from agriculture to the Welsh economy every year

£499.3 million from woodlands each year'

(copy and pasted from the SONARR webpage, February 2017).

22. Taking this data at face value might lead one to conclude, from an economic standpoint, that we should replace farming with forestry to increase GVA. These figures however, **do not** compare like-with-like.

The £499.3m figure:

According to the ONS statistics quoted in the Wales Woodland Indicators 2015 report the forest sector is worth slightly more than £499.3m, totalling £528.6m in GVA to Wales (defined as gross output less intermediate consumption). This comprises:

- Forestry and Logging £22.3m
- Manufacture of wood products and products of woodland and cork* £172.6m
- Manufacture of paper and paper products £333.7m

(this is an EU Standard Industry Classification (16), we don't actually produce cork in Wales)*

23. However the next page of the WWS indicators document shows that this circa £500m GVA appears to be obtained by importing around 80% of the timber raw material inputs (50million m3 p/a) used in generating overall GVA (data, however, does not appear separately for Wales), see WWS Indicators P48. It is not correct therefore, to imply that woodlands in Wales generate £499m GVA each year, much of this GVA would likely exist without any domestic timber production at all (and as we export only around 4 million m3 p/a from the UK, substitution would not close this gap). Also, it is not clear what current paper production GVA is, since the UPM Shotton paper mill was reported to have closed half its production at the end of 2015 and how much of this relies on Welsh production of pulpwood is not clear.

24. *The £385m figure:*

A detailed calculation of the £385m GVA from farming is given by the ONS. This is basic output from Welsh farming, less inputs, and does **not** include any subsidy. (The food processing sector is worth circa 1.5bn GVA p/a).

25. A more accurate (though still not perfect) comparison of farming and forestry GVA might therefore be:

£385m from primary agricultural output produced in Wales
£22.3m from primary forestry and logging activity in Wales

or:

£1.55bn from food manufacturing and on-farm food production (? of which relies on imported inputs*)

£506.3m from the timber products sector (circa 80% might be reasonably expected to rely on imported inputs)

*We tried to find out from National Statistics the proportion of the Wales/UK food GVA that uses imported inputs, but this data is apparently not available.

26. This is clearly still too simplistic a comparison for a number of reasons including:

- *we do not know how much Welsh timber contributes to the £172.6m, or the £333.7m paper to compare £499m with £1.5bn*
- *these are aggregated figures and we should be considering these questions at a more localised level (optimisation),*
- *both primary agricultural and forestry production import feedstock and plants for restocking etc and we don't know the value of this,*
- *are the classifications accurate between the three categories or, as forestry is based on a high proportion of inward investment, is some primary output picked up outside Wales? (data on GVA is often taken from Vat and tax returns, for example)*

But the point is, at least we are asking the right questions.

27. Forestry *does* compare favourably to agriculture, when secondary processing is taken into account. As above, the value added to timber in the Welsh economy is around £172m which contributes significantly to employment of skilled jobs and represents a contribution to regional economies. It also demonstrates a ready market for wood material produced in Wales, which could support an expansion in wooded area and more timber generated by bringing more woodlands into management. More timber of higher grades could be feasibly produced from sites such as Plantation on Ancient Woodland Sites, and some Ancient Semi Natural Woodland, which deliver high nature value. A further £333m is contributed by paper and paper product factories located in Wales. Again, it would be very useful to understand the relative contribution of domestic production to these figures.
28. Another way of looking at the SONARR data might therefore be: to deliver economic resilience, if we were looking to optimise GVA, we might therefore wish to evaluate:
- using trees to enhance farm productivity to increase the £385m GVA
 - increase the value added to Welsh timber through secondary processing, to gain a greater share of the £172.6m GVA, offsetting the circa 80% import of timber
 - increase the 206,000 ha of woodland / or increase woodland brought into management, to increase the £22.3m GVA from this activity p/a

SONARR highlights the third option. Through further analysis of the data we have added two more options. To deliver optimisation under the NRP priorities, we would also need an analysis of environmental, cultural and social resilience in the context of determining wider optimal land use at a landscape scale. The optimal option might then differ depending on the context. The role of the NRP would be to provide the lead for decision making and delivery mechanisms to incentivise this action to take place.

Consultation Response Form

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Your address: Portland House, Bickenhill Lane, Solihull, Birmingham, B37 7BQ

13th February 2017

Dear Sir / Madam

Re: Consultation to inform the development of the natural resources policy

Thank you for the opportunity to contribute towards the Natural Resources Policy development.

Tarmac, a CRH company, is the UK's leading sustainable building materials and construction solutions business. Our innovative services and solutions help to deliver the infrastructure needed to grow the economy today and create a more sustainable built environment to support our future prosperity. We employ approximately 7,000 people at more than 350 operational locations across the UK and are the largest manufacturer of cement and lime with facilities based in England, Wales and Scotland.

The Welsh Government's focus on accelerating green growth by increasing resource efficiency, renewable energy and supporting innovation is welcomed by Tarmac. However, it is important for the Welsh Government to recognise that products such as cement, concrete, aggregates and asphalt are vital to infrastructure projects that will

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facilitate this green growth. This ambition will require projects including, but not limited to; renewable generation, flood defences, road and rail links and the construction of buildings such as schools and hospitals – all of which require sustainable construction materials. Mineral products are critical to the delivery of the three priority themes identified in the consultation document and should be considered key to the Welsh economy, prosperity, health and culture.

Tarmac recognises the importance of using resources efficiently. Across the UK, each year we make beneficial use of over 8 million tonnes of waste from other sectors which we use as raw materials and fuels. We continue to look for more opportunities to use waste within our processes, for example, by investing in the innovation of new products and solutions that require less material or have higher recycled contents. We are in fact the largest recycler of construction materials in the UK.

Despite the on-going efforts to use resources in the most efficient manner there will nevertheless be a continued demand for primary minerals. Long term strategic thinking is needed to ensure that an adequate and steady supply of Welsh minerals are consented in line with the ongoing demand for infrastructure, houses and other construction projects that contribute to improved well being and the UK economy. To facilitate this, the primacy of permissions must be maintained through an up-to-date plan led system with efficient processing of planning applications and informed engagement in the process by relevant stakeholders. Improving public understanding of the need for minerals, their geography and their significance to the Welsh and UK economies is important to support this.

Through the progressive restoration of our operations, we are able to enhance quality of life and biodiversity. Biodiversity should be recognised as contributing towards the country's natural capital. For example, a study undertaken by the RSPB states that as an industry we have the potential to deliver 100% of 9 out of 11 priority habitats identified in the UK Biodiversity Action Plan. Indeed, the improvements of mineral workings can help meet challenges identified in the consultation document.

Access to water and using water in the most efficient manner are also priorities for our business. Tarmac believes such issues are best managed on a catchment area basis and would welcome the opportunity to collaborate with others.

Energy security at competitive prices is vital for operational businesses, especially energy intensive mineral based operations like cement manufacture. Tarmac supports the proposal to invest in energy infrastructure and would welcome efforts to ensure sufficient energy supplies remain accessible and affordable compared to overseas competitors.

With regards to circular economy, we would like to assist by offering some important information from the cement industry in Wales and its contribution towards circular economy thinking.

Tarmac fully supports the circular economy principle. We are fully engaged and began using waste as raw materials and fuels in our cement manufacturing business many years ago, for example, using end-of-life tyres and other waste materials as fuels and

recovering ash from power stations for use as a beneficial part of the finished cement product.

This 'industrial symbiosis' is now an integral part of the cement manufacturing process. The UK cement industry now uses about 1.6 million tonnes of waste per year and sends no process waste to landfill, so as an industry we are a net consumer of waste.

Use of wastes as fuels referred to as co-processing with energy recovery may usually rank on the fourth tier of the waste hierarchy (i.e. other recovery). The ash that is produced from the firing of waste in the cement kilns is fully incorporated into the intermediate product, cement clinker, which reduces the amount of primary product that needs to be manufactured and displaces some of the raw materials which would otherwise be needed. By recovering all of the waste material in this way, co-processing is in fact a high level recycling process.

The use of waste derived fuel in our cement kilns is a key contributor to the reduction of energy usage in our operations and subsequently the amount of carbon emitted. For example, we make use of end-of-life tyres, meat and bone meal, solid recovered fuel, sewage pellets, carpet waste and other waste materials in the kiln firing process to reduce the amount of carbon emitted at our cement plants. Putting waste to work as a resource is a cornerstone of our sustainability strategy and as demonstrated above, Tarmac have the ability and track record to make beneficial use of significant amounts of waste thus contributing to Wales' developing circular economy. In addition, we add other industry's wastes and by-products as raw materials in clinker manufacture and to the finished cement, thus still further reducing our need to make cement clinker. Taken together, these processes significantly reduce our carbon footprint from the manufacturing process.

A secure and adequate supply of quality recyclable materials is important to our ongoing commitment to maintain and improve the sustainability performance of our business and products. The availability of suitable waste derived fuels is critical to the sustainable production of cement in Wales, where Tarmac produces cement at Aberthaw. Therefore, ensuring adequate supply of these waste materials in the future should be a critical consideration when developing resource efficiency policies. Should the supply of waste fuels be affected, the progress that has been made to reduce the reliance on fossil fuels in our operations will be jeopardised. The unintended consequences of which will be an increased dependence on Wales' natural resources, in particular fossil fuels, which is contrary to the overarching objective of the circular economy.

Tarmac would welcome the opportunity to work with the Welsh Government to create a long-term vision for minerals supply, recycling and reuse to create the certainty and confidence in investment required to deliver infrastructure programmes.

I hope that you find the above comments of interest and use. If you do have any questions resulting from the above, or would like to discuss the points raised in more detail, then please do not hesitate to contact me.

Yours faithfully,

Tim Cowling
Regulatory Affairs Manager



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Natural Resources Policy Branch
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10th February 2017

Dear Sir/Madam

Thank you for inviting the Farmers' Union of Wales to respond to the consultation to inform the development of the Natural Resources Policy.

The consultation has been considered by the Farmers' Union of Wales' twelve County Branches, and their responses are summarised below.

There were a number of overriding concerns highlighted by our members:

1. The Gross Value Added (GVA) figure for Welsh agriculture, given as £385 million, goes little way to reflecting the wider value of agriculture to Wales, including in terms of key Future Well-being goals.

For example:

- a. Around 58,000 people are employed in full, part-time and seasonal work on farms
 - b. Agriculture is the most significant single contributor to an estimated £1.9 billion in wildlife-based activity
 - c. Farm businesses with turnovers of more than €25,000, of which there are around 10,000, annually pay some £1.04 billion in wages and payments to other businesses
2. Throughout the consultation there is relatively little mention of agriculture, despite around 80% of land being managed by farmers, and that much of the actions relating to the SoNaRR findings will take place on agricultural land.

Given farmers' roles as land managers, and the wider role farm businesses play in terms of other well-being goals, the Farmers' Union of Wales believes that greater account should be taken of agriculture and the needs of agriculture when formulating policies that tie into the wider themes and objectives of the Natural Resources Policy.

3. The consultation is conceptual with little clarity on how policies will be implemented on the ground. It is far from clear what it would mean for farmers and rural businesses, and how any changes would impact on businesses across Wales.
4. There is widespread concern regarding the potential restrictions that Area Statements may place on rural businesses; how these will be dealt with by relevant authorities; and how these may interact with other designated areas. For example, where a single business is subject to rules associated with one or more Area Statements, the Local Authority and a National Park authority, this may be restrictive and burdensome for both the business and officials.

5. There is concern that an inappropriate Natural Resource Policy will lead to Area Statements which have little impact other than to restrict profitability and economic opportunities for the majority

Written feedback on the key steps that need to be taken to deliver on the priority themes:

Members expressed concern that the key steps had been drawn up in isolation and with little or no account having been taken of economic realities and impacts. Members queried how the ideals identified within the document would be put into practice, without funding to support the practical implementation of the objectives identified, while there was widespread concern that farmers could be forced to undertake practices or be subject to constraints which were uneconomic.

Written feedback on the key challenges

Safeguarding and increasing our carbon stores

- Members welcomed the growing recognition that Wales' peat-rich land, much of which is common, has been under severe pressure from under-grazing. It was therefore felt that land abandonment in upland areas of Wales should be combatted, through greater recognition that a balanced eco system is only obtained through careful management of grazing numbers. In particular, it was felt that little recognition of historical grazing numbers had been taken account of over the years, and that grazing restrictions had often been based upon misguided assumptions.
- It was felt that means by which the agricultural industry can be paid for carbon storage and maintaining and increasing water quality should be further investigated, including through arrangements with private bodies - particularly if WTO rules restrict the ways in which government can pay for such ecosystem services.
- Concern was expressed that significant barriers exist to the creation of woodland on areas which are of little agricultural value, including bureaucratic barriers (as experienced with successive Glastir Woodland Creation schemes) and economic boundaries in terms of the lack of markets for wood. Such barriers also led to under-management of woodlands in ways which reduced carbon uptake and ecological benefits for many species.
- Members emphasised that an appropriate balance needs to be struck between agriculture and woodland creation, and that policies which lead to large expanses of agricultural land being planted with trees or land abandonment will have a detrimental impact on rural cultures, economies and habitats - as happened during the 20th Century

Maintaining our productive capacity

- Members agrees that maintaining Wales' productive capacity is important, and emphasised the need for this to be recognised locally, including in areas which are relatively unproductive but nevertheless important in terms of agricultural systems (for example, hill areas used for summer grazing)

Reducing the risk of flooding

- Whilst members acknowledged that some problems derived from agriculture, it was felt that the degree of blame put upon farming practices for increasing flooding risks is wholly disproportionate, not least given failures by authorities to dredge rivers and waterways, and the numbers of inappropriate housing and industrial developments built on floodplains.
- Members noted that there has been a significant reduction in the amount of land that is ploughed and cultivated over the past century, leading to mature pastures being much more prevalent. Over the same period, there has been a significant increase in the area planted with conifers, and many believed that too little account had been taken of the degree to which such plantations had increased run-off.
- Notwithstanding this, it was acknowledged that all land managers have a role to play in terms of reducing the risk of flooding, and that properly funded and proportionate evidence based measures should be drawn up in consultation with local farmers, with a view to both reducing flooding and ensuring individual farm businesses are not adversely impacted.

Improving health and equity

- Members highlighted the fact that Wales has approximately 16,200 miles of footpaths, 3100 miles of bridle-paths, and 1200 miles of byways; that since 1998 the area of land accessible by right to the public has increased three-fold, National Trails have been created and extended, and 4,700 miles of rights of way have been opened up under improvement plans.
- Despite such increases, including in access to good quality green or blue spaces around urban areas, little or no progress has been made overall in terms of tackling those health and well-being issues associated with inactivity, thereby providing clear evidence that vast increases in access do not address the problem.
- It is therefore believed that the Welsh Government should focus on encouraging responsible access, and that there is a danger that a preoccupation with liberalising access equates to pandering to a small minority of individuals who are already active while abdicating responsibility to those whose health and well-being continue to deteriorate.
- Members also highlighted the detrimental impact visitors to the countryside were having on the well-being of others, as reported recently in terms of damage to footpaths and litter in National Parks, and fly-tipping. As such, it was felt that a Wales wide policy to educate the general public and younger generation regarding the impacts of such actions should be implemented.

Improving the quality and maintaining the availability of water

- Many members queried the statement that there is a high dependency on Welsh rivers for water supplies, given the significant proportion of water supplies which are in the high reaches of the tributaries of rivers, not on the rivers themselves.
- Whilst members agreed that actions needed to be taken to reduce pollution, they emphasised the need for these to be proportionate and evidence based, and that the role played by other industries and domestic sources also needed to be acknowledged.

Improving the quality and connectivity of our habitats

- Members highlighted the degree to which quality and connectivity had been improved under the Glastir and previous agri-environment schemes.
- Members highlighted that the most significant changes in land use over the past six or so decades in vast areas of Wales had been (a) reductions in the amount of stock being grazed on upland areas, (b) significant falls in the amount of land being ploughed for arable production - particularly in upland areas, and (c) significant increases in afforestation, particularly in the uplands. Members highlighted the work done by the FUW and the Cynefin project which highlights and helps quantify changes in land use in both upland and lowland areas.

Retaining the distinctiveness of our places and historic landscapes

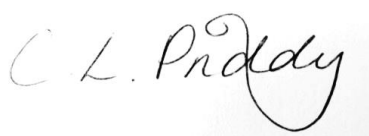
- Members emphasised the fact that Wales' distinctive landscapes and environments are there because of agriculture - not in spite of it.
- As such, many were concerned that an underlying failure to recognise this, coupled with other agendas or misguided prejudices, could threaten the habitats, and places the majority would seek to preserve and enhance.
- It was also emphasised that overzealous actions which restrict Welsh farm businesses will simply lead to production in other countries which have far lower social, environmental and animal welfare standards than those required of Welsh farmers, thereby having a net negative impact.

Written feedback on the barriers that need to be addressed

- Members were concerned that the biggest barrier was likely to be cost, both in terms of implementation by authorities and economic impacts for businesses
- As such, the need to prioritise actions which bring palpable economic benefits, in line with well-being objectives, as opposed to costs, was emphasised.
- Members also expressed concern that a major barrier to improving habitats was advisors who have little or no interest in or knowledge of historic practices, and therefore provide advice based upon misapprehensions.

I trust the above comments will be taken into account by the Welsh Government.

Yours faithfully

A handwritten signature in black ink, reading 'C. L. Priddy', written in a cursive style.

Charlotte Priddy
Policy Officer



Campaign for the Protection of Rural Wales
Brecon and Radnor Branch
Secretary: Dr Christine Hugh-Jones
Cooks House, Norton, Presteigne Powys, LD8 2HA
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13th February 2017

Brecon & Radnorshire and Montgomery Branches of CPRW:

Response to Welsh Government Natural Resources Policy Consultation

CPRW is Wales' foremost countryside protection charity, founded in 1928. It aims to increase public awareness of the importance of landscapes and seascapes. It promotes their responsible care and use. It defends the qualities that make rural Wales special. It seeks to influence decision makers to guide responsible change and oppose them when they don't. It promotes landscapes as inspiring places for learning, personal development and well-being and it celebrates Wales' heritage of landscapes, culture and rural life.

Brecon & Radnorshire and Montgomery Branches are the two Powys branches of CPRW.

Like our pan-Wales CPRW charity, we welcome the opportunity to respond to the Natural Resources Policy consultation (NRPc) which has profound implications for our charitable purposes. We endorse the general response from the National Director of CPRW which has also addressed some of the issues we raise. We are grateful to you for also considering our own, local response which is presented in different terms and informed by our local experience of Natural Resources issues in Powys.

1. OVERVIEW

On a practical level, it would have been helpful to number the pages (we use pdf page numbers below) and to clarify some of the vaguer optimistic statements such as those at the bottom of pdf p.14 and pdf p.15.

'High quality natural resources also play a key role in supporting key sectors, such as in the case of water, farming, fisheries, energy, recreation and tourism and can drive further opportunities for local businesses in areas like carbon through payments for ecosystem services (PES).'

'Good public path networks could also increase the range available to pollinators'

Overall we find the NRPc too generalised and too unwilling to face the real challenges of drawing up and implementing a Natural Resources Policy fit for the long term Sustainable Management of Natural Resources (SMNR). We consider that the seven goals of the Well-being of Future Generations Act (WbFGA) allow such broad interpretation that the relation between the Act and the NRPc easily becomes a matter of random search for *"Help! What can we put in this box?"* rather than a thorough consideration of the complex relations involved and the real challenges for a plan of action.

2 PRIORITIES

We have reviewed the recent State of Natural Resources Report (SoNaRR) which describes itself as **the evidence base for the NRP**. We regard this document as a courageous first attempt at an honest account of the state of current evidence about the state of Natural Resources (in the widest sense) in Wales, with useful bibliographic sources. The SoNaRR contains the laudable commitment to use the exercise of producing this report for laying out the ground for a more ambitious and more refined report in 2020.

While the SoNaRR is extremely welcome, we note that, as the analysis gets further removed from the evidence base and more integrated with the WbFGA goals, it also gets more difficult to translate into effective policy. This is because “ecosystem services” actually derive from wider ecosystems and some “ecosystem services” can only be exploited by further degradation of other “ecosystem services”.

By and large, the economic exploitation of natural resources can be assigned monetary value (as quoted in the NPR pdf-p.6) whereas other human gains or losses and biodiversity advantages or disadvantages can not. As SoNaRR says (Ch.5 p.11) *“we still lack quantitative data that would allow us to link current biodiversity status and trend data with the delivery of ecosystem services”*. The same is true of the aesthetic pleasure and general enjoyment and educational gain people derive from their landscapes and natural surroundings. These gains apply *par excellence* to residents, whose well-being is at stake, although only tourists are “monetised”.

There is a serious risk that services for which there is no clearly definable market economic value will be undervalued in a PES “payment for ecosystem services” system, firstly, because we do not understand enough about ecosystems to recognise their true value and, secondly, because low values will suit financial budgets and commercial interests.

We consider it a pity that the NRP document builds on the previous interim 2015 Natural Resources Policy Statement rather than directly on the more complete and recent evidence base from SoNaRR which includes the State of Nature (Wales) information. We further regret that the seven “challenges” of the 2015 Statement have been translated into just three “opportunities” or “priority themes”:

- Accelerating green growth
- Delivering nature-based solutions
- Taking a place- and landscape-based approach to improve well-being

without any clear idea of how these might be translated into policy, resourced in terms of finance and expertise, or implemented to tackle *“the root causes of unsustainable trends”* (NRPc pdf p.8).

Place and Landscape

While we warmly welcome the principle of a *“place and landscape”* approach, closer reading leaves us concerned that the report does not actually have the common understanding of *“place and landscape”* in mind. We consider that the CPRW and public understanding of *“landscape”* is based on the visual, sensory and cultural experience of our unique and varied Welsh landscapes both inside and outside of specially designated areas. These are the qualities and *“sense of place”* which LANDMAP classification has attempted to capture for policy and planning purposes through its five landscape aspects. NRPc says *“there is a clear link between Wales’ natural resources and Wales’ reputation as a high quality international tourist destination. The historic environment also draws many visitors into Wales and many of Wales’ most beautiful landscapes*

are also rich in the remains of previous human activity". However, the document does not reveal any commitment whatsoever to maintain or enhance these landscapes.

Further on in the NRPc (pdf p.15) working at a *"landscape scale"* seems to mean a combination of addressing natural resource issues on a broad ecosystem basis, as presented in SoNaRR Ch. 3 (e.g. woodlands), and in appropriate areas (e.g. river catchments). The vague statement that *"As opportunities for spatially targeted actions to build healthy resilient ecosystems that deliver key ecosystem services are identified, there will almost certainly be a strong correlation with priority habitats and species"* suggests there has been no rigorous thinking through of Priority 3 in terms of either landscape, biodiversity or concrete policy.

We consider that the NRPc implies a high risk that Welsh landscapes will continue to be subject to unrestrained degradation by inappropriate and non-sustainable development. These landscapes are more than an important healthy opportunity for outings for nearby urban populations: they embrace 90% of Wales, are the setting for the Welsh rural population who also have WbFGA rights, and are a unique but fragile asset for the valuable tourist economy and future generations.

Biodiversity

We are no less concerned by the relegation of *"Biodiversity and Resilience of Ecosystems Duty"* to a subsection (pdf p.12) without making it clear that the Welsh Government itself is the over-arching responsible body for this duty. The Welsh Government's role is presented as providing a "platform" for others (principally LPAs) to report their successes but not their failures. In our experience, LPAs simply do not have the expertise, finance or human resources to integrate this holistic duty into their activities. Powys, for example, has no landscape officer and one ecology officer and has to buy in outside services – and then only when absolutely essential. At present, in spite of the duty imposed by recent legislation to work towards the Water Framework Directive goals, our LPA, which receives statutory advice from NRW, is repeatedly failing to protect designated water-courses from pollution as a result of inappropriate agricultural development.

This lack of expert staff does not bode well for any partnership work on a local Area Plan or local Well-being Plan, based on detailed local knowledge, designed to improve the disastrous situation described in SoNaRR, for example:

- *90% of semi-natural nitrogen sensitive Welsh habitats are subject to nitrogen deposition in excess of critical load limits which impacts on the health and resilience of ecosystems and biodiversity (NRPc).*
- *The condition of SAC and SPA species features on sites in Wales, as reported in 2013, remains mostly unfavourable, with the exception of birds and mammals. Between 2002 and 2008 fewer than half of the species on the interim Section 71 list were considered to be stable or increasing (NRPc).*
- *It is fair to say that when it comes to our consideration of soil management, there are gaps across the board in the current regulatory system....the health and resilience of our ecosystems is being compromised. This includes targets not being met or 'limits' in danger of being breached (SoNaRR ch.6 p.23).*

3. BARRIERS

General Approach

We appreciate that the NRP must find a way to integrate guardianship of ecosystem assets and Welsh landscape with economic policy and human well-being. We underline the SoNaRR reminder that the

guardianship duty does not mean maintaining the status quo: it means reversing adverse trends and enhancement. We also appreciate that the NRP must be a positive document, setting out opportunities for improvement on all these fronts. However it should not be an unrealistic document which ignores fundamental issues and concentrates on easy targets and partial, cherry-picked solutions. Conservation and development can only be reconciled for the well-being of current and future generations if a balance is achieved and we do not see this reflected in the NRPc. This requires a methodology for looking at the evidence as honestly and objectively as the current state of evidence allows. Long term impacts must be compared with short term impacts and the full range of positive and negative ecosystem and economic impacts must be taken into account.

Failure to explore implications:

We note that the NRPc is reluctant to spell out some of the SoNaRR findings about impacts of intensive farming with need to be addressed both for the long-term safeguarding of soil quality and security of food production and for biodiversity. We also note that both SoNaRR and the NRPc fail to explore the ecosystem impacts of various types of renewable energy development, particularly failing to balance the real ecosystem costs and negative well-being impacts on Welsh populations. Some of these are opportunity costs of land use, preservation of carbon reserves, biodiversity of uplands, pollution risks, and landscape impacts. We trust that in drawing up Area Plans in collaboration with local stake-holders, NRW will be open to local concerns about how truly resilient systems can be best achieved. We consider that these failures are inconsistent with the *“sustainable development principle”* as set out in the Well-being of Future Generations Act 5(2) (a) & (b).

Resource deficits

We have a broad concern about resources, both human and financial. From a general public point of view, the concept of ‘ecosystem services’ is remote from most Welsh people’s daily concerns which are:- finding a rewarding, meaningful life, gaining a living, caring for family and friends and maintaining physical and mental health. There is a huge public understanding gap which extends to the crucial agricultural sector and local government. This can only be addressed by a mixture of education, public participation and a more appropriate regulatory regime.

Wales has powerful, newly-devolved functions but at the same time faces loss of a European market with Brexit and suffers continual outward migration of highly educated and skilled people of working age and inward migration of retired people. Financial cuts ensure that the experience and skills of LPA staff are bound to decline in inverse relation to the complex new duties placed upon them.

We would have appreciated clearer acknowledgement of these challenges and a discussion of resources both financial and human, including the need to incorporate education at all levels:- schools and further education, landowners and decision-makers.

Clear Intention to Implement Relevant Policy

The Welsh Government takes pride in its international recognition as an exemplar of natural resource management (Ministerial Foreword, NRPc pdf p.5). Given this, we would expect the NRPc to provide some indication of how the regulatory regime might be strengthened to protect ecosystems and well-being by controlling misuse of land, emissions and waste by devising ways of setting more appropriate limits, “making the polluter pay” and establishing proper and proportionate new habitat creation schemes to compensate for development. In addition, we do not share the Minister’s confidence that extant Welsh legislation, will cover all the provisions of European environmental regulation (NRPc pdf p. 5) post Brexit.

Research

We consider that a clear acknowledgement of the need for basic scientific research should be part of this report, together with how the WG, NRW and the further education sector can collaborate to take this forward.

SoNaRR has usefully attempted to rate the confidence levels for the information providing the evidence base for this report. It is notable that SoNaRR has had to rely heavily on general UK sources and on some very out-of-date sources. In many instances there is no proper evidence base for Wales – either because none has been researched or because the Welsh data collection is methodologically unsound. Without going into specific details, a review of the “medium” and “low” confidence levels in the two annexes (Confidence Methodology and Record of Confidence Assessments) demonstrates this.

It is particularly worrying that the key resilience summary table in SoNaRR Ch. 3. *Summary of extent, condition and trends of natural resources and ecosystems in Wales*, which provides the immediately non-technical accessible core evidence base for NRPC, is only assigned ‘moderate’ confidence. Given the dates of some key sources, for example: *Blackstock TH, Howe EA, Stevens JP, Burrows CR & Jones PS. 2010. Habitats of Wales: a comprehensive field survey, 1979-1997. Cardiff: University of Wales Press, Cardiff.*, the state of Welsh ecosystems is almost certain to be significantly worse than portrayed.

We would like to have seen a government with devolved planning functions recording its responsibility for research and monitoring of Welsh biodiversity and ecosystems in keeping with the 4(e) of the Environment (Wales) Act duty to “take account of all relevant evidence and gather evidence in respect of uncertainties”.

Public Involvement

Two other objectives (besides providing an evidence base) in the SoNaRR are to:

- Inform area statements
- Provide a platform for collaboration and engagement.

These are reproduced in NRPC. We would have liked more information about the development of Area Statements and the role of Public Service Boards as described in the Well-being of Future Generations Act and we seek reassurance that independent stakeholders such as ourselves and the Wildlife Trusts will have a voice in the management of our local landscapes and eco-systems.

Scrutiny and best practice

NRW is not independent of the Welsh Government and, as many stakeholders such as ourselves have frequently commented, this makes for conflict of interest between Welsh Government economic development policy and landscape and biodiversity conservation (resilience) goals.

We were extremely pleased to see the Paper (**NRW B (O) 31.13**, presented to the NRW Board Meeting on 4.9.13), proposing an Independent Science Advisory Committee. However we cannot find any evidence that such a committee has been appointed. The only body founded to provide independent scientific advice to the Welsh Government appears to be confined to human health issues: we are also aware that a National Infrastructure Commission is proposed. We can find no evidence of university level training in biological or physical sciences amongst Welsh Cabinet Ministers and we believe that the proportion of NRW Staff with university level scientific backgrounds, including post-graduate experience is declining (although we stand to be corrected).

We strongly recommend that an **independent Scientific Advisory Committee** of high-calibre scientists is appointed to advise NRW. This would help ensure current best practice in keeping with highest scientific standards in the management of our vulnerable and deteriorating natural resources and ecosystems. We

trust that the Welsh Government would take full account of such advice.

A handwritten signature in dark ink, reading "Christine Hugh-Jones." The signature is written in a cursive, flowing style.

Dr Christine Hugh-Jones

Secretary: Brecon and Radnor Branch



Consultation Response: Informing the development of the Natural Resources Policy

Your name: Catrin Jones

Organisation: Tidal Lagoon Power

email / telephone number: catrin.jones@tidallagoonpower.com

07867129796

Question: *Written feedback on the priority themes and key objectives within them outlined in this document would be welcome as part of this consultation exercise. In particular, taking into account the legal framework and its requirements as outlined in this document, it would be helpful to receive contributions on:*

- *the key steps that need to be taken in order to deliver on the priority themes and address the key challenges; and,*
- *the barriers that need to be addressed.*

Priority themes and key objectives

Given that the consultation document makes it clear that there is a commitment to publishing a policy next month, it is not clear how feedback from the consultation can inform development of the Natural Resource Policy at this stage. I would assume the policy is already written, therefore a consultation on a draft policy might have provided more focus. There's reference in the consultation document on Roundtable meetings and workshops. It is not clear how stakeholders get involved with these events, nor who is welcome to be involved. Tidal Lagoon Power would welcome future involvement with any such events.

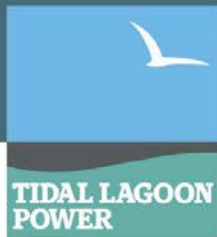


The natural resources policy priority themes identified provide a coherent focus that are clearly linked to the Wellbeing Goals. Identification of these themes should make it easier to identify who needs to be involved with implementing the natural resources policy. Both the Wellbeing of Future Generations Act and the Environment Act require a step change or a shift in how things are done, the importance of doing so is amplified by the uncertainties arising from the UK leaving the European Union (which also mean taking a refreshed look at Wales' comparative advantages to ensure that Wales has the strongest possible platform for social, cultural, economic and environmental wellbeing for current and future generations).

The five ways of working under the Wellbeing of Future Generations Act are particularly relevant with this in mind, we are acutely aware of the potential for tidal lagoons to contribute to sustainable development in Wales (and the Wellbeing Goals) and can see how strategic consideration and integration of ideas could unlock opportunities. Therefore it is important to involve companies that have an outlook similar to Tidal Lagoon Power; we think long-term; we have an interest in supporting achievement of the Wellbeing Goals; we are keen to collaborate with public bodies, communities, third sector and other private sector interests to achieve positive outcomes. All three of the natural resources policy priority themes are relevant to tidal lagoons. Perhaps the most obvious contribution is tidal lagoons accelerating green growth (increasing renewable energy significantly and supporting innovation through establishment of a new low carbon industry in Wales, research and development etc.).

Delivering nature-based solutions is central to our approach to developing tidal lagoon (with tidal lagoons clearly improving the benefits derived from natural resources by realizing the potential of a currently untapped renewable energy; although improving resilience is inherent in any nature-based solutions investment, in the case of a tidal lagoons it is complemented by the ability for the breakwaters to provide long-term coastal protection). There are a number of potential tidal lagoon sites in Wales. Tidal Lagoon Power is progressing an Ecosystems Enhancement Programme (EEP); the vision for the EEP is to have enhanced biodiversity in parallel with the development of a fleet of future lagoons. A key objective of the EEP is to address the compensation and ecosystem scale mitigation requirements that we anticipate will arise from future tidal lagoon development, aiming for a substantial net positive outcome. The strategic objectives of the EEP include:

- Supporting efforts to minimise the impact of projects by looking to maintain and enhance as far as possible the intertidal and subtidal resource within and associated with the lagoons;



- Restoring and creating new wetland sites to maximise biodiversity and afford opportunities for climate adaptation, flood risk management, the historic environment, green tourism and education;
- Supporting habitat restoration efforts for migratory and resident fish and birds through collaborative partnerships with local and global nature conservation organisations;
- Delivering targeted enhancement initiatives for relevant features listed under the Habitats Directive / IUCN Red List species / UK Biodiversity Action Plan (BAP), priority species, supporting local and European-scale biodiversity conservation;
- Enabling changes in land management practices to support biodiversity and water quality improvements;
- Establishing long-term funding mechanisms to support the EEP.

We are already working with public bodies in Wales in the third sector on elements of the EEP. We would welcome Welsh Government involvement.

Our commitment to improving community and individual wellbeing by taking a place (and landscape) based approach is demonstrated by the pathfinder Swansea Bay tidal lagoon project. Significant communication and engagement, and involvement of local communities were key determinants of communities 'owning' the project, which is a pre-requisite for success. We welcome a place based approach, including at landscape scale, as a way of making implementation of natural resources policy relevant and meaningful to communities. We have been involved in a workshop (run by Natural Resources Wales) on developing the process for developing the Area Statements. Identification of 'Areas' for the place based approach is challenging. There could be a number of different ways of identifying them, for example based on water catchments or ecosystems (environmental drivers), public service board area or city region (governance/funding drivers), or related to nationally significant infrastructure projects (e.g. ports, M4 relief road, Wylfa Newydd, tidal lagoons). This is clearly a matter that requires some direction via the natural resources policy.

A number of sectors will be able to identify how they can contribute across the three key themes. As described earlier, tidal lagoons in Wales have significant potential to drive positive outcomes under each of the three key themes. By mapping of activities relevant across the three themes, it should be possible to identify inter-relationships, which in turn could identify activities (and interventions) that contribute the most (greater spread of benefits). This sort of exercise could inform case studies that may support implementation of the natural resources policy.



Key steps to deliver on the priority themes and address the key challenges

In addition to the six key natural environment challenges identified in the 2015 natural resources policy statement, there are cross-cutting challenges which should be identified, including in relation to delivery (governance, funding), evidence base (including on climate change impacts), and community understanding and involvement (education, collaboration etc.). Also, the six key challenges inter-relate; more sustainable management will mean regulation of activities, but it should also mean ensuring natural resources are utilised sustainably. For instance, marine energy is underutilised, harnessing the power of Wales' tidal range will help transition away from carbon intensive sources of energy production (that may be causing unacceptable air quality impacts on habitats and health), whilst significantly contributing to prosperity through jobs and GVA. Therefore there is a need for further consideration of the key challenges, to ensure that contextual (e.g. UK departing the EU) and these cross-cutting issues are understood.

Barriers that need to be addressed

An important step to address the challenges is to identify barriers, which will vary in significance according to geographic scale and place. A cross-sectoral workshop may be an effective way to approach this, to include involvement of a number of stakeholders that have quite different perspectives (e.g. producer, regulator, investor, member of a community, service provider, developer etc.).

A significant barrier is funding, which is likely to exacerbate as costs increase and there is greater pressure on public funding. Clearly, multi-sectoral partnerships will be essential to identifying new ways of working and identifying funding for delivering outcomes. We can readily provide a number of examples of how some public bodies find it difficult to overcome barriers to work with us on initiatives. These may be real or may be perceived barriers. We can also provide examples of public bodies that are enthusiastic about working with us on similar initiatives. Perhaps there is a reluctance to work with the private sector because of past experience. Welsh Government have a role to facilitate solutions and overcome such barriers because the step change required to address the key challenges in an incredibly challenging context necessitates finding new and innovative ways of working, including with the private sector.

Providing a coherent direction in policy is a prerequisite to overcoming barriers, supplemented by guidance on how to approach problem solving and developing solutions. Often excellent policy intentions get lost in the delivery because of processes, or the way processes are administered. Effective leadership can help overcome some of these issues, though cannot be relied upon as a constant factor in the implementation. The policy itself should be clear on



priorities and coherent enough to empower those involved in natural resource management (whether regulator, communities, land managers, developers etc.) to be confident in the implementation, acknowledging sometimes that it will be challenging, but the emphasis should always be on solutions, which may require difficult decisions, especially in the case of strategic outcomes.

Given the different roles of NRW as it relates to natural resource management, it is crucial that Welsh Government provide the big picture and clarity of purpose. Welsh Government should provide direction, with emphasis on delivery of outcomes, in order to enable effective land management, confident and rational advisors, and assertive decision-making (everyone in the 'chain' must understand the principles, how it relates to their role, and be working towards a common end goal/outcome). There must be a clear line of sight between the natural resources policy and implementation. There must be a common understanding of terminology and how to apply in practice, such as how to think long-term, and how to apply adaptive management to facilitate renewable energy projects. There must also be an understanding that a key factor of success is attracting investment in sustainable management of Wales' natural resources. An indicator of success for the natural resources policy should be performance of NRW; an effective policy will enable a solutions focused organisation capable of achieving the best for Wales.

Area Statements must be considered a tool to support and/or enable implementation, rather than a reason to delay implementation of the policy. For example, the policy should inform decision-making relevant to natural resource management, such as management plans for nature designations, flood risk management planning, river basin management planning, which should all incorporate consideration of the principles of sustainable management of natural resources, and consider the five ways of working under the Wellbeing of Future Generations Act. For an example, please refer to our recent response to a consultation on extending a SPA designation (attached with this proforma).

In the case of tidal lagoons, without a doubt, the potential opportunities for a positive contribution to sustainable natural resource management are significant, and can be realised more effectively if barriers and solutions are identified early. Welsh Government could use tidal lagoons as an early case study example of how to implement the natural resources policy by working together to identify different actions and decisions that will be required at local, regional and national scales.

-END-



If you have any related issues which we have not specifically addressed, please use this space to report them:

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here:

☐



Welsh Fisherman's Association
Cymdeithas Pysgotwyr Cymru

The national voice of Welsh fishermen

CONSULTATION TO INFORM THE DEVELOPMENT OF THE NATURAL RESOURCES POLICY:

CONSULTATION RESPONSE:

Name: Jim Evans

Organisation: Welsh Fisherman's Association-Cymdeithas Pysgotwyr Cymru:

Email: jim@wfa-cpc.co.uk or office@wfa-cpc.co.uk

Address: Maes-Y-Dre, New Road, Newcastle Emlyn SA38 9BA:

Whilst we understand that the state of natural resource (SoNaRR) Report is the first iteration of a national evidence base for Wales to guide the development of the Natural Resources Policy (NRP) and is to be revised as the evidence base improves. That said we would note our concern regarding the current evidence referenced to support the State of Wales' Natural Marine & Fisheries Resources: Given the significance of the Environment (Wales) Act 2016 and the purpose of SoNaRR in providing an evidence base to support the NRP our understanding is that the environment Act is specific to Wales and therefore the evidence base must be relevant to Wales Marine area in this case. We are concerned that references used to support statements in respect of Marine and Fisheries that are either extracted from the UK Article 17 Joint Report to the EU or from UK Level Ecosystems Assessment (UK NEA) 2016, such references/evidence do not produce reports at a country level with sufficient confidence to inform Welsh environmental policy for an Assembly term. Accepting that the SoNaRR is a first iteration and will be subject to revision we would urge caution in relation to relying on condition assessments to inform policy at a Welsh level, furthermore the sector economic statistics within the SoNaRR Technical Report Chapter 5 (Wellbeing in Wales) are confusing possibly double accounted, fish and shellfish are only valued by landing and aquaculture is not included at all. We would welcome a breakdown of the economic values to establish an accurate economic understanding of the contribution derived from the Welsh marine Area:

Theme 1 – Landscape Scale Support:

The Sustainable Management Scheme (SMS):

Despite the purpose of SMS being "To provide financial support for a range of activities that will improve the management of Wales' natural resources and in doing so contribute to the wellbeing of Wales' rural communities" there is no mention or recognition of the marine environment and a complete disconnect of coastal rural communities in a scheme that is designed to support the delivery of this Welsh Governments Commitment to sustainable development as set out in the wellbeing of Future Generations (Wales) act 2015 and the implementation of the requirements of the Environment (Wales) Act 2016, enabling Wales' resources to be managed in a more proactive, sustainable and joined up way. Either I have misunderstood the intention of SMS in the wider delivery of SMNR or the scheme is not holistic and continues to support a

silo approach to delivering national policy objectives with no regard to the expected outcomes and the potential that exists within this marine environment to deliver significant nature based solutions:

Theme 2 - Nature Based Solutions (NBS)

Payments for Ecosystem Services (PES) – A Market Based Funding Opportunity:

Given the significance of nature Based Solutions within the NRP and the potential for PES to deliver against all the themed objectives of the NRP it seems incredible that the potential for (NBS) and (PES) that exist within the marine environment are not given specific consideration within the NRP. For example:- Molluscan Aquaculture can produce the following NBS which will provide natural benefits that are continually supported by the economic activity of growing shellfish.

NBS: increased carbon storage, increased bio-diversity, bio-remediation and water filtration, bird food Intertidal, and production of a healthy protein for human consumption without contributing to climate change. If regulatory barriers were addressed to enable the economic activity investment would be forthcoming that would facilitate the growth and continuity of the aquaculture associated nature Based Solutions given that PES does not in many cases produce payments in monetary terms the Nature Based Solutions as described would sustain an environmental value maintained as a by product of the economic activity:

Theme 3 - Resilience:

Bio-diversity – the Interrelationship between the Natural Resources Policy (NRP) and the Nature Recovery Plan (NRAP):

Unlike the natural resources policy the nature recovery plan does feature Marine in section 6 “action for nature recovery in the marine environment” this section summarises the actions needed to achieve WG objectives. The programmes and mechanisms to support delivery in the marine environment with the exception of the Welsh National Marine Plan (WNMP) there is no reference to the Welsh marine area within the NRP whilst it is acknowledged that the status between marine and terrestrial bio-diversity loss is not comparable there is an increased bio-diversity and resilience of ecosystems duty introduced through the Environment (Wales) Act 2016 it would therefore be welcomed if there were to be greater transparency and read across from the NRAP to the NRP in respect of the key marine objectives and policy priorities. Note that the NERC 42 List was last reviewed/updated in 2008 and that its transition to Section 7 provides a welcome opportunity to review the list as required under the current duty. This will be crucial to establish a baseline for which to monitor marine bio-diversity. Water quality issues have major impacts on bio-diversity and thereby resilience in the marine area. NRP must address, diffuse and point source pollution including land management practices, sewerage discharges, abandoned mines, misconnected sewers and combined sewerage outflows. 80% of marine litter originates on land as does the increased levels of pollution/run-off, NRP priorities should include robust measures to address the sources of litter and pollution that negatively impact the marine environment biodiversity and reliance:

Theme 6 - Sustainable Management of Natural Resources – Marine:

Wales National Marine Plan (WNMP):

The primary purpose of the WNMP is to guide authorisation and consent decisions within the sustainable development principles of the Wellbeing & Future Generations (Wales) Act 2015 providing an indicative evidence resource through Wales' Marine Evidence Report (MER) and the Marine Planning Evidence Portal to support consenting authorities in respect of applications to develop within the Welsh Marine Plan area whilst observing general and sector planning policies which need to be considered within making decisions within the marine area:

A Plan led approach would contribute to the NRP in the development of Area Statements:

Natural Resources Policy development

Page 1: Submit your response

Q1. You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

Name	Martin Bishop
Organisation (if applicable)	Confederation of Forest Industries, (Confor)
Phone number	07876 029482
Address	1 woodfield house, bryn-y-gwenin, abergavenny, np78ab

Q2. If you want to receive a receipt of your response, please provide an email address.
Email address

martin.bishop@confor.org.uk

Q3. Written feedback on the priority themes and key objectives within them outlined in this document would be welcome as part of this consultation exercise. In particular, taking into account the legal framework and its requirements as outlined in this document, it would be helpful to receive contributions on: the key steps that need to be taken in order to deliver on the priority themes and address the key challenges; the barriers that need to be addressed.

Confor Response to the consultation on NNRP

Accelerating green growth by increasing resource efficiency, renewable energy and supporting innovation entirely misses the point that we need to increase our usage of resources produced from sustainable and renewable resources to replace the usage of non-renewable resources. Timber produced in Welsh forests is the ideal raw material, it can and should be used to replace products made from non-renewable sources.

We also need to increase our usage of products from resources that are less carbon intensive in their manufacture and reduce the use of high carbon embodied products. Again timber fulfils this requirement.

Increasing resource efficiency is desirable but unless the resource is sustainably produced in the first place it is an entirely misplaced concept. If any product is made of materials from unsustainable supply chains then no matter how much we reduce consumption we would still be using resources from unsustainable sources and that is against all the aspirations of the wellbeing and future generations act. The reference to reducing our use of virgin materials is counterproductive if the virgin material is both renewable and sustainably produced, as is the case with forest products. The reference to should be either removed or amended as to say reducing our use of resources from non-renewable sources.

Sustainable materials grown and produced in Welsh forests start off as a net carbon sink, helping to reduce the carbon debt that the WG has to address. Timber produced by the Welsh forestry sector is the ultimate sustainable resource and we should seek to expand and promote that. NNRP needs to acknowledge that.

Forestry and wood processing is the classic sustainable sector; trees harvested to create the everyday wood products that society needs can be replanted in a never-ending cycle. Unlike other sectors, an increase in the economic activity of the forestry sector also delivers additional environmental benefits as trees soak up carbon and wood products store carbon. Productive forestry also provides many other benefits for society, including recreational facilities, biodiversity habitats, and water management and flood prevention.

Resource efficiency is driven by the circular economy concept, timber products produced by Welsh

forests are an exemplar of the circular economy in that they are produced and replenished sustainably, they are reusable with many different uses throughout their product life and ultimately used to replace fossil fuels in energy production.

Although using forests and wood as a source of biomass is sustainable energy, the undesirable consequence of pursuing an increase in renewable energy from biomass is to reduce the available resource for existing timber products. The forestry sector welcomes biomass as another market for the forest products and will continue to promote the new opportunities this market presents, however we wish to see the production of energy from biomass increase in scale in addition to the present markets for timber products not at the expense of existing markets. Our support for the increase in renewable energy from biomass is conditional on a commensurate increase in the forest area and resource to supply the increase demand.

Delivering nature-based solutions to improve resilience and the benefits derived from natural resources. Many of the benefits derived from natural resources, mostly provided by woodlands, are enjoyed by all of society, they are spelt out clearly in woodlands for Wales strategy and an increase of forest cover in Wales will help deliver many more.

Forests and trees provide different benefits and solutions depending on what and where they are. Urban trees and woodlands help remove air pollution, reduce temperature in towns and cities, assist with SUDS and provide biodiversity habitats and recreation facilities in badly needed areas. Chart 11 in WFW indicators 2015-16 show the huge range of benefits urban trees provide.

The larger forests in rural areas also provide many benefits to the urban population and these benefits are often much greater thanks to the larger scale of these forests. The air we breathe is cleaner and less polluted thanks to the trees scavenging the pollutants out at a huge scale. Trees can reduce the water flow, helping to reduce the risk of flooding many miles downstream.

These larger, often commercial, forests also provide timber, the raw material on which a huge industry relies on. WFW indicators 2015-16 shows the forestry sector has a GVA of £500m, from just 14% of the land area in Wales. This industry provide many well paid jobs in rural areas of Wales, over 11000 (table 10 WFW indicators), one of the largest, (if not the largest) private sector employer in rural Powys is a sawmill which is reliant on the forests to provide the timber. There has been substantial investment by these wood processing companies in recent years, at least £48m in the last 8 years, but they could do much more, recent surveys suggest that they could treble their capacity if the resource was there to support it.

Timber sales and jobs can be valued and calculated but it is difficult to quantify and put a value on many of the other benefits forestry provides which makes public funding of the actions that are creating the benefits both difficult and unlikely. The forestry sector is a profit making sector, the commercial activity of growing timber generates income for landowners helping to pay for many of the benefits society enjoys. This also helps to reduce the demands on the public purse with less funds needed to be spent on health because of cleaner air and less spent on flooding prevention projects downstream.

The stated objective to reducing the demand for virgin materials, whilst laudable for non-renewable resources, is in fact the worst possible objective for the forestry sector. All the benefits forestry provides to society like cleaning the air and water, mitigating against flooding, habitats for biodiversity and places for recreation are provided, mostly at no cost to the public purse, by the commercial activity of producing timber. Any aspiration to reduce demand for forest products will reduce the commercial activity which is the only activity that is providing funding to manage woodlands. This will lead to at least a stagnation of woodland creation and quite possibly a reduction in the forest area with a corresponding reduction in the benefits the forests provide.

Improving community and individual wellbeing by taking a place and landscape based approach. It is difficult to respond to this theme as we feel it is not clear what this refers to.

In the context of woodlands and forests there is plenty of evidence of the wellbeing provided by forests for all, the WG's woodlands for Wales strategy spells out clearly the part woodlands play. One of the desired outcomes of the WFW strategy is that more people live healthier lives as a result of their use and enjoyment of woodlands, Chart 15 in WFW indicators 2015-16 show some of the benefits. Table 8 in 2015-16 WFW indicators also shows an increasing percentage (80.8% up from 72% in 2009) of the population has access to 20ha+ within 4km of their home.

Improving community and individual wellbeing are enhanced by access to green spaces and leisure facilities, these facilities are often provided at no cost to the public purse by the forestry sector. Chart 19 in WFW indicators shows the range of activities. Expanding the forest area in Wales can only mean that more people get access to the facilities they provide and must therefore improve wellbeing for everyone.

The place based approach is dependent on the scale at which it is judged. Forestry operates at different scales depending on where it is and what is its function. As commented above urban forests provide many benefits at a local level but these are different to the larger rural forests. It is wrong to judge either on the merits of the other, both are important but both need to operate at the scale which is appropriate. The larger rural forests need to operate at a grand scale to achieve economies of scale,

their benefits are also felt at scale and they need to be assessed in their capacity to contribute to the wellbeing of the whole of Wales. A small urban woodland could never hope to achieve Wales wide benefits and they should not need to. The point is we need both large and small scale with some operating locally and some at a Wales wide level.

The key steps that need to be taken in order to deliver on the priority themes and address the key challenges;

1. Recognise that timber is a renewable resource and prevent WG policy from discriminating against it.
2. Increase woodland creation in Wales and support long term woodland management in order to provide a renewable resource for both the existing markets for wood and the projected increase in biomass use.
3. Address the shortfall identified in the timber availability forecast and build on the findings of the Confor / WFBP report arising from the Oct '14 workshop Welsh Softwood Timber Supplies and Our Green Economy conclusions and recommendations key recommendations.
4. Use the knowledge that forestry provides many additional benefits to society as a reason to increase the woodland area of Wales without waiting for proof or trying to value these benefits and services.
5. Continued support for forestry research in areas like new technology, plant health ecosystems services provided by forestry Loss of EU funding post Brexit.
6. Use legislation to stimulate the use of timber products as replacements for non-timber materials e.g. concrete, plastics, steel. "Timber first" for public procurement.

The barriers that need to be addressed.

1. The NNRP needs to support forestry creation and accept the compromises necessary to allow the regulators to make it happen.
2. Accept the premise that we will have land use change in Wales.
Over regulation and inadequate regulation.
Uncertainty over public support schemes.
Woodland creation mapping criteria.
3. EIA legislation and process.
Acceptance that we need a conifer resource in Wales as well as a broadleaved resource.
Communicate the message about where timber products come from to WG, the regulator and the public to gain acceptance of the type of woodlands Wales needs.
4. The concept of Payments for Ecosystem Services or Natural Capital are laudable but the process and system for making these judgments is still a long way off and may never be fully understood, which will only serve to delay the decision making process.
We should accept that forestry provides many benefits to society and use that information to enable an increase in the woodland area in Wales.
A perfect decision is desirable but unachievable.
No decision is achievable but undesirable.
A less perfect decision is achievable and desirable.
5. Reduced profitability for private companies driven by a reduction in resource availability will in turn reduce their ability to fund research.
6. Building regulations.
Conservatism of architects and planning/building inspectorate.
Public awareness.
Governmental reluctance to favour one sector over another.

Q4. If you have any related issues which we have not specifically addressed, please use this space to report them:

The key steps that need to be taken in order to deliver on the priority themes and address the key challenges in the context of woodland creation are improve the decision making capability of the regulator by creating area in Wales where there is a presumption in favour of woodland creation. Nothing in this policy is geared towards improving the clarity needed to make the, often difficult, choices that will have to be made if we are to progress this policy. Everyone involved needs to know the priorities of WG, do we want land use change or not? Without clear priorities set by WG in advance there is no incentive for anyone to change what they desire and land use change will simply not happen. Without clear guidance on the desired outcomes how can the regulator actually regulate, all they can do is opt to retain the status quo.

The barriers that need to be addressed are to encourage or persuade the organisations in Wales that seek to perpetuate the status quo to actually engage with land managers and decide on the best use of land in Wales. Cooperation is the desire of two or more parties to come together and mutually gain something out of the process, if one party already gets all they desire then there is no incentive to cooperate.

In the case of woodland creation we need to know where forests can be created and there needs to be a presumption in favour of tree planting in these areas, and we need to be very clear and firm on that. This would drive everyone to the cooperation table.

Q5. Responses to consultations may be made public. To keep your response anonymous (including email addresses) tick the box.

Keep my response anonymous

H/c 02



8 February 2017.

Natural Resources Policy Branch,
Welsh Government,
Floor 1 East,
Carthays Park,
Cardiff,
CF10 3NQ.

Dear Sirs,

CONSULTATION: NATURAL RESOURCES POLICY

As the trade association that represents the technical and commercial interests of processors of wood grown in Wales, England and Scotland, we welcome the opportunity to comment on the consultation that will inform the development of the Natural Resources Policy. For the purposes of this response to the consultation, we have focussed on forestry matters.

The forests and woodlands of Wales, be they in the public forest estate, or in private ownership, are a unique and valuable asset and resource, which provide a wide range of economic, social and environmental benefits to Wales and indeed, further afield. We were encouraged that the significance and value of the forestry sector in Wales is recognised; it has a GVA in excess of £499 million and provides at least 10,000 jobs, mostly in rural areas.

Of particular interest to our sector is sustainability in general and sustainable forest management in particular. The application of sustainable forest management techniques, as demonstrated by independent certification of forest management systems to the UK Forestry Standard and the UK Woodland Assurance Standard, is an essential requirement and accreditation of the public forest estates in Wales, England and Scotland to internationally recognised standards, such as the Forest Stewardship Council is demonstration of this. However, the face of forestry in Wales is changing, and not necessarily for the better.

There are increasing concerns across the forestry and forest products sector in Wales that the public forest estate, owned by the Welsh Government and managed on its behalf by Natural Resources Wales, is significantly underperforming and there are questions about the fitness for purpose of Natural Resources Wales, in terms of its management and stewardship of the public forest estate. There are particular concerns about the lack of new woodland creation and also restocking policy, which is leading to the creation of an increasingly large area of forest land that has been harvested, but not replanted. The organisation does not appear to be taking a long-term view of forestry, perhaps being driven by financial constraints. A long-term view is essential, given the long-term nature of forestry. Nor does NRW seem to place value on the skills and experience of professional forestry staff within the organisation. This is demonstrated by the fact that NRW has no forestry expertise amongst its senior management team, which in our opinion is a very serious omission.

Prior to the establishment of NRW in 2013, the public forest estate in Wales was managed by Forestry Commission Wales, which had exercised a high standard of stewardship and management of the estate, with the guiding principles of protection, improvement and expansion of the public forest estate. NRW is in grave danger of squandering the legacy of the Forestry Commission in Wales and Wales will be the poorer as a consequence.

Given the very important role that the natural resource of trees, woodlands, forests and forest products play in terms of enhancing biodiversity, enhancing landscape, supporting sustainable development, mitigating the effects of climate change, providing carbon storage, mitigating flooding, supporting rural employment, enhancing health and well-being and the supply of low carbon products for a wide range of end uses, it is vitally important that the public forest estate is managed in a professional manner, with a long-term approach, ensuring sustainable forest management at all times.

Wales has a World-Class wood processing sector, producing a wide range of sawn wood products and wood based sheet materials for a range of markets. Businesses in the sector have an excellent record of continued investment, which has resulted in increased market share for Welsh timber products, by displacing imports. However, given the significant role that the public forest estate plays as a provider of wood to the processing sector, the continued success of the sector will be jeopardised unless urgent action is taken to ensure that NRW is fit for purpose and fully understands the importance of its role as a manager of this valuable natural resource.

The forests and woodlands of Wales are a unique component of the natural resources of Wales and given their importance, they deserve nothing less than appropriate stewardship and management; the Welsh Government must ensure that NRW is fit for purpose and acts in the best possible interests of the public forest estate and all who are dependent on it. The forests and woodlands of Wales have already demonstrated their considerable value, by the delivery of economic, social and environmental benefits for Wales, but a step change is urgently required if we are to not only see this continue, but better still, increase.

Whilst a comprehensive and robust Natural Resources Policy is essential, so too is an effective delivery mechanism. At present, we believe that the potential to maximise the contribution from the public forest estate in Wales is unlikely to be fully realised under the current Natural Resources Wales approach to its management. There is undoubtedly scope for the public forest estate to increase its contribution, but will only do so if Natural Resources Wales acknowledges the importance of forestry in its portfolio and adopts a more professional and longer term approach to the management of this natural resource.

We call on the Welsh Government to continue its recognition of the value of all trees, woodlands and forests in Wales and the products derived from them and furthermore, to take steps to ensure that Natural Resources Wales applies a World-Class approach to its stewardship and management of the public forest estate, so as to ensure the best is made of this unique and valuable natural and national resource for the benefit of future generations.

It is worth contrasting the situation relating to forestry in Wales and Scotland. The Scottish Government not only recognises the value of the sector, (GVA of about £1 Billion and about 25,000 jobs), but has recently increased its already ambitious woodland creation target from the current level of 10,000 hectares per year, in a stepped approach, to 15,000 hectares per year by 2025, with a significant proportion of the new planting to be of commercial species. This is very welcome news and will provide further encouragement and confidence to wood processing businesses in Scotland. Furthermore, the Government is proposing the creation of a dedicated Forestry Division within the Government and a separate land management agency to be responsible for managing the public forest estate and other Government landholdings. The new arrangements will replace Forestry Commission Scotland and build on its legacy.

Many in the forestry sector had expressed concern about the complex and time-consuming woodland creation approval process. In response to this, the Cabinet Secretary for Rural Environment & Connectivity commissioned a review by the Government's former Chief Planner to identify ways in which the official process can be streamlined and accelerated. The recommendations of the review have been accepted in principle by the Cabinet Secretary and we look forward to a simplified and faster process, which will encourage increased levels of woodland creation. It seems likely that there will be lessons for the improvements in the equivalent systems in Wales and England. Interestingly, a debate on forestry was recently held in the Scottish Parliament and the Government's proposals received cross party support from the principal opposition parties. It is to be hoped that in recognising the significance of its forests as a natural resource, that the Welsh Government will give serious consideration as to how it could stimulate a renaissance in forestry in Wales, that would benefit future generations.

The consultation seeks contributions on the key steps that need to be taken to deliver the priority themes and address the key challenges and barriers that need to be addressed. Whilst achievement of the desired objectives will require commitment from both the public and private sectors, involving a multi-agency approach and partnership working; from a forestry perspective, we would suggest that management of the public forest estate in Wales urgently needs improvement, to ensure appropriate standards of stewardship.

The key challenge for the natural resource of forestry is to get Natural Resources Wales to accept the need for improvement in its stewardship and management of the public forest estate, including the need for experienced and knowledgeable forestry staff throughout the organisation. Businesses in the forestry and wood processing sector in Wales will continue to play their role in supporting the delivery of Welsh Government objectives, but the Government must play its role by ensuring that its agency tasked with managing the public forest estate, Natural Resources Wales, is fit for purpose and capable and committed to playing its part too. It should be noted that concerns of this type are not being expressed in relation to the management of the public forest estates in Scotland and England, where the Forestry Commission continue to manage the estates in a professional manner.

We hope that these comments will be of interest and look forward to seeing the development of a Natural Resources Policy that all in Wales can be proud of.

We have enclosed our completed Consultation Response Form.

Yours faithfully,

A handwritten signature in black ink, appearing to read "David J. Sulman", followed by a short horizontal line.

David J. Sulman
Executive Director.

Natural Resources Policy development

Page 1: Submit your response

Q1. You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

Name	robert ellis
Organisation (if applicable)	-
Phone number	01591620756
Address	-
	-

Q2. If you want to receive a receipt of your response, please provide an email address.
Email address

bertie@rnwellis.co.uk

Q3. Written feedback on the priority themes and key objectives within them outlined in this document would be welcome as part of this consultation exercise. In particular, taking into account the legal framework and its requirements as outlined in this document, it would be helpful to receive contributions on: the key steps that need to be taken in order to deliver on the priority themes and address the key challenges; the barriers that need to be addressed.

This is a self congratulatory acceptance of a set of attitudes which can neither be proved nor disproved. For instance, while one may applaud looking after wild life, does this mean that one should support wild life at the expense of agriculture, or do you mean we should encourage intensive farming to feed the people?

Climate change could be advantageous,I was told by the ancients in Llangammarch Wells that the Romans grew wine there.

Q4. If you have any related issues which we have not specifically addressed, please use this space to report them:

Your attitude. There is little point in having a "consultation" when you produce such a mish-mash of mumbo-jumbo which may, or may not, be right.

Q5. Responses to consultations may be made public. To keep your response anonymous (including email addresses) tick the box.

No Response

Natural Resources Policy development

Page 1: Submit your response

Q1. You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

Name	Max Wallis
Organisation (if applicable)	-
Phone number	-
Address	Trem y Môr, 3 Penarth Head Lane, Penarth, CF64 1BB
	-

Q2. If you want to receive a receipt of your response, please provide an email address.
Email address

maxkwallis@gmail.com

Q3. Written feedback on the priority themes and key objectives within them outlined in this document would be welcome as part of this consultation exercise. In particular, taking into account the legal framework and its requirements as outlined in this document, it would be helpful to receive contributions on: the key steps that need to be taken in order to deliver on the priority themes and address the key challenges; the barriers that need to be addressed.

Trem y Môr
3 Penarth Head Lane

Theme 1 on "accelerating green growth...." needs to be reframed to include clamping down on non-green growth.

A key step is to have a national conversation on what constitutes green/ungreen growth, eg. aviation-based holidays abroad, luxury car production and purchase/use in Wales, energy efficiency of new homes relatively high and low (at and below the minimum building standard levels)

Q4. If you have any related issues which we have not specifically addressed, please use this space to report them:

Trem y Môr
3 Penarth Head Lane

The omission of Wales's situation in the global environment and economy.
The perspective needs to include our international responsibilities on CO2 etc. and the goal of one-planet living. It should say the previous intention to assess our ecological footprint has proved impractical, but Wales still needs to address and reduce our over-use of global resources, with 5 or 10-year targets.

Q5. Responses to consultations may be made public. To keep your response anonymous (including email addresses) tick the box.

No Response

Natural Resources Policy development

Page 1: Submit your response

Q1. You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

Name	JAGJohnson
Organisation (if applicable)	Trallwm Woodlands
Phone number	01591610229
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Q2. If you want to receive a receipt of your response, please provide an email address.
Email address

coedtrallwm@aol.com

Q3. Written feedback on the priority themes and key objectives within them outlined in this document would be welcome as part of this consultation exercise. In particular, taking into account the legal framework and its requirements as outlined in this document, it would be helpful to receive contributions on: the key steps that need to be taken in order to deliver on the priority themes and address the key challenges; the barriers that need to be addressed.

1. Accelerating green growth could be by creating new forests and improving the productivity of existing forests by good species choice and management directed towards resource efficiency - eg economies of scale, tree improvement, improved technology.
2. Delivering nature based solutions could be through flood mitigation, shelter, control of pests and diseases, biodiversity.
3. Improving community and individual wellbeing through provision of employment, community heating schemes, value adding, infrastructure improvement eg road, rail, broadband, health and education.

Barriers: Woodland creation and restocking grants should be available for significant areas of productive conifers to counter the perceived loss in value when land changes to forest especially on the poorer upland soils where agricultural production is very low. If owners are penalised for planting productive forests then they will be less likely to do so and the nation will be poorer for it.

Q4. If you have any related issues which we have not specifically addressed, please use this space to report them:

No.

Q5. Responses to consultations may be made public. To keep your response anonymous (including email addresses) tick the box.

Keep my response anonymous

Natural Resources Policy development

Page 1: Submit your response

Q1. You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

Name	David V Edwards
Organisation (if applicable)	Tilhill ForestryLtd
Phone number	01550 721 442
Address	Lloyds Bank Chambers, 14 High Street, Llandovery, SA20 0PY

Q2. If you want to receive a receipt of your response, please provide an email address.
Email address

david.v.edwards@tilhill.com

Q3. Written feedback on the priority themes and key objectives within them outlined in this document would be welcome as part of this consultation exercise. In particular, taking into account the legal framework and its requirements as outlined in this document, it would be helpful to receive contributions on: the key steps that need to be taken in order to deliver on the priority themes and address the key challenges; the barriers that need to be addressed.

Tilhill Forestry Ltd is the largest Forest Management company in UK and manages approximately 20 000ha of commercial woodland in Wales for a range of clients ranging from institutions, individual investors and landowners including farmers. Although woodland creation in Wales has fallen well below Government aspirations Tilhill has been involved in planting the largest proportion of new planting of any organisation this century and dating back to 1948 only the Forestry Commission has planted more new woodland.

We welcome the prospect of a cohesive Natural Resources Policy covering all the integrated components that contribute to the sustainable management of Natural Resources within Wales. However we have concentrated our response to this consultation on the management of forests and woodlands and the land that has potential to contribute to creation of new woodland. We have also not discussed urban trees which can have such an important beneficial impact on the quality of life in our towns and cities. We leave it to others to make the case for determining the policy of managing our other Natural Resources but would wish to play our full part in cooperating and working with partners.

The benefits of forest and woodland are extensive and are a Natural Resource unrivalled in the "boxes they tick" to deliver multiple benefits in a way that is sustainable in the long term. These include producing timber, fibre and biomass; sequestering carbon; scrubbing pollutants from the atmosphere; substituting for energy and finite resource dependent concrete and steel; controlling surface water runoff and flooding; providing valuable habitat for flora and fauna; sites for healthy exercise and recreation; shelter; and landscape.

Sustainability is a relative term but modern commercial forestry adhering as a minimum to the UK Forest Standard is right up there in terms of true sustainability requiring less in the way of inputs than other land uses but delivering so much. The forests and woodlands of Wales deliver ecosystem services under all three recognised pillars of sustainability; economics, social and environment

The problem facing forestry in Wales is that "we don't make it any more" and to enable forests to maintain delivery of key ecosystem services we need to expand the woodland resource to contribute to green growth. The way we manage our forests, often for the right reasons, has meant we have seen a loss in productive forest area of 18000ha since the millennium! This is tantamount to destroying the Natural Resource we have inherited and it is essential we reverse this decline to pass on our inheritance, undiminished and enhanced, to future generations. This is not an aspirational hope but

something tangible that is in our gift to deliver.

In addition to the loss of productive area there will be a severe drop in timber production from about year 2030 as the forests planted in the 60s and 70s yield up their timber. The vibrant wood processing industry in Wales has developed on the availability of this truly sustainable natural raw material and if the sector is to continue to thrive then more well designed forests are needed and needed now. The contribution of the forestry sector, particularly to the rural economy, is significant with GVA of £499 million which is greater than that of agriculture. It should come as no surprise that the largest private sector employer in the largest rural County of Wales is a sawmill!

Timber produced in Wales is a direct substitute for imported timber with the UK being the third largest importer in the world after China and Japan. Because the UK is such a large net importer of timber Brexit offers further opportunity to take market share from imports and the huge home market means there is no need for significant export and exposure to trade restrictions. Even if the UK economy shrinks post Brexit the opportunity to increase market share remains as imports become increasingly expensive with a weakened pound. The vast majority of imported timber is softwood and it is this we can substitute with home grown conifers. Growing of non-conifer species contributes to many of the ecosystem services woodlands have to offer but they cannot substitute at any scale for imports. To be sustainable we have to grow utilizable products that can contribute to the economy. All new woodland as an absolute minimum will include 25% as non-productive area dedicated to biodiversity, conservation and amenity. Commercial areas also contribute to these positive attributes of woodland as well as producing a sustainable and utilisable raw material.

The most important factor for resilience of woodlands and all they have to offer is economic. A woodland that pays its way is far more resilient than one that does not – "the wood that pays is the wood that stays". A paying woodland is better able to adapt and diversify to other threats associated with pests, disease and climate change quite simply because it can afford to.

The opportunity to expand productive woodland, remembering WG have an aspiration to plant 100 000ha over 20 years, requires land to be made available for new planting. Planting new woodland on productive agricultural land is not the best use of natural resources as such land is better harnessed to food production. The land resource that is most suited to woodland creation at scale are the marginal uplands of Wales used mainly for rearing subsidised sheep or increasingly for not producing anything. Such marginal land can grow utilisable trees more economically than it can grow sheep. This land is available on the open market for inward investors and existing landowners alike. Farmers able to sell off marginal hill land release funds for investment in the remainder of their holding making the enterprise more sustainable as an economic unit. Alternatively selling land provides an exit strategy for farmers wishing to retire.

A fundamental corner stone of wellbeing must be having gainful employment which has benefits beyond simply economics for rural families. People living fulfilling lives and working in the countryside are the best way of ensuring resilience of local communities and maintaining a cohesive society. The people of Wales are a key resource in themselves and need to be taken full account of in developing a Natural Resources Policy.

The question is asked what are the barriers to woodland creation? It is not the lack of land to buy, capital to invest, markets for the produce or even protection of designated areas. The single most significant barrier to woodland creation and the green growth it generates is regulation. It is regulation that so often stops woodland creation in its tracks and the belief that somehow preserving every bit of what is euphemistically described as "priority habitat" stops planting. There appears to be no one person or organisation prepared to make a decision on priorities of what truly is a "priority habitat" and what can be given up for the greater gain in overall ecosystem services. All too often "priority habitats" that are "saved" will be lost anyway due to lack of connectivity, scale, removal of grazing or colonisation by unproductive scrubland. An analogy is to make an omelette requires the breaking of eggs but if those eggs are simply left to go bad they will be of no use to anyone! Empowering this decision making is the key to delivering significant and productive new woodland. We have concerns this empowerment will not come from Area Statements although we think they are an opportunity to guide decision making.

The forests and woodlands of Wales are a fantastic sustainable Natural Resource and we look to Welsh Government to ensure Natural Resources Policy allows them to continue making a substantial contribution to the economy and that significantly more productive woodland is created to deliver yet more green growth and provision of ecosystem services.

Q4. If you have any related issues which we have not specifically addressed, please use this space to report them:

n/a

Q5. Responses to consultations may be made public. To keep your response anonymous (including email addresses) tick the box.

Keep my response anonymous

Natural Resources Policy development

Page 1: Submit your response

Q1. You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

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Address	Brynlllys 11 High St Llandrindod LD1 6AG

Q2. If you want to receive a receipt of your response, please provide an email address.
Email address

andrew@bronwin.co.uk

Q3. Written feedback on the priority themes and key objectives within them outlined in this document would be welcome as part of this consultation exercise. In particular, taking into account the legal framework and its requirements as outlined in this document, it would be helpful to receive contributions on: the key steps that need to be taken in order to deliver on the priority themes and address the key challenges; the barriers that need to be addressed.

Key steps - WG has to step upto the plate and start making difficult decisions. It wants to be all things to all men and that just isnt possible. Choices and decisions have to be made about our natural resources and the use of the rural sector. That means compromise and negotiation and WG has to arbitrate between the various sectors. To expect open and unbiased collaboration is not realistic.

Barriers - the 'no' culture. We have developed a culture in Wales of civil servants and NGOs objecting to change and there is too much opposition to movement from the status quo. As a result entrepreneurship, enterprise and investment are discouraged. The risk is that the natural resources policy and the new legislation simply gives more power to the blockers to reject change. To date Wales has survived partly due to subsidies from Westminster and Brussels but this is very likely to change post Brexit. If that does happen Wales needs to be more competitive and better at earning its own keep but there is every chance that the reality of this wont hit home in some sectors of Government until the cash dries up. By that time it may be too late.

Q4. If you have any related issues which we have not specifically addressed, please use this space to report them:

Forestry sector

There is a real opportunity to develop and grow the commercial forestry sector which is being ignored by WG. In 25 years the softwood resource will diminish and long before that time mills will cease investing which will impact on rural jobs and the economy. There is a huge internal demand for timber which, if we don't grow our own, will be met by imports from Ireland and Scotland.

The decline in the softwood resource is due to peat and PAWS restoration, wind farms and improvements in woodland biodiversity. Replacement planting is not taking place and new woodland creation is being blocked due to the interpretation of historic landscapes, priority habitats and acid catchments. If this approach continues, which it may unless there is a cultural change, then the opportunities for additional carbon capture, rural jobs and the potential to grow our own timber for export to England and our own use will be lost.

WG has shown no interest in aiding and enhancing the commercial forest sector. This negative attitude must change. There is no point having ambitious policies and legislation to improve the natural resources if the country can't afford to implement them. Wales has been excellent at developing exciting, innovative policy and absolutely terrible at delivering it. Aspirations have to be realistic and affordable, especially so now the public purse is under such strain.

Wales has to start saying yes and not no!

Q5. Responses to consultations may be made public. To keep your response anonymous (including email addresses) tick the box.

Keep my response anonymous

Natural Resources Policy development

Page 1: Submit your response

Q1. You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

Name	Matthew Harris
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Address	-

Q2. If you want to receive a receipt of your response, please provide an email address.
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mbharris@cardiff.gov.uk

Q3. Written feedback on the priority themes and key objectives within them outlined in this document would be welcome as part of this consultation exercise. In particular, taking into account the legal framework and its requirements as outlined in this document, it would be helpful to receive contributions on: the key steps that need to be taken in order to deliver on the priority themes and address the key challenges; the barriers that need to be addressed.

I support the Priority Themes, though in answer to the question 'Written feedback on the priority themes and key objectives within them outlined in this document would be welcome as part of this consultation exercise.', I would not say that there are any clear 'key objectives' set out in the text of those themes to provide feedback on.

In terms of key steps, challenges and barriers I could point to the usual suspects such as the need for funding and high-level political and corporate buy-in.

Q4. If you have any related issues which we have not specifically addressed, please use this space to report them:

Generally I support the ecosystem approach to Natural Resource Management as set out in this document, together with a shift away from focussing purely upon biodiversity, but my concern with this approach is that there may be cases where management of ecosystems for the services they provide to humans may not always provide the support that is needed for certain habitats and species. In the latter case, not all species are 'Keystone Species' or 'Ecosystem Engineers' so it may be that specific actions beyond simple habitat management are needed to ensure their recovery.

The three Priority Themes relate almost entirely to ecosystem services – the support and benefits that humans derive from ecosystems. Whilst the role of biodiversity in healthy functioning ecosystems is recognised, what is not evident is that biodiversity has an intrinsic value, as well as being a contributor to these services.

In part this may be a reflection of the nomenclature used - 'Natural Resources Policy' and Natural Resources Wales' both emphasise the importance of ecosystem services – and whilst it's true that biodiversity has to 'pull its weight' in terms of its contribution to ecosystem services, it is also true that nature recovery – the recovery, maintenance and enhancement of wildlife, habitats and ecosystems - has to be a goal in its own right.

Similarly, the list of Natural Resources Policy Challenges from the previous interim NRPS concentrates on ecosystem services and makes reference the need to improve habitats, but does not mention biodiversity or ecosystems themselves.

If it is the case that the function of the NNRP is to consider ecosystem services alone, and that the Nature Recovery Plan, as a separate document, will deal with biodiversity, then this should be made more explicit than is currently the case. Otherwise, the Priority Themes of the NNRP should be amended to include nature recovery as a theme in itself, or at the very least, the link between biodiversity and ecosystem services should be made much more explicit.

The link between biodiversity and ecosystem services is recognised to some extent in that the Area Statements are referred to as providing an evidence base for the Biodiversity and Resilience of Ecosystems duty (BRED). However, I am not convinced that this link is reflected in the text of the three Priority Themes.

Similarly, the BRED and the Environment Act are mentioned in section 3, but no real link is made between the BRED and the Priority Themes of the NNRP. The Nature Recovery Plan is also mentioned in this section, but it is linked to the NNRP by the sentence 'The (National) natural resources policy can therefore provide a strong pro-active platform which supports action on biodiversity across the public sector.' This doesn't really explain how the two are linked. Is the suggestion that the NNRP is solely focussed on ecosystem services and the proactive nature conservation work guided by the NRP? If so, then firstly this distinction should be made more explicit and secondly this could be seen to relegate the NRP to a lower status than the NNRP, unless it is made clear in the NNRP that this is not the case.

Under the third Priority Theme 'Improving community and individual well-being...', the sentence 'As opportunities for spatially targeted actions to build healthy resilient ecosystems that deliver key ecosystem services are identified, there will almost certainly be a strong correlation with priority habitats and species.', does not in my view provide sufficient certainty that recovery of priority habitats and species will be fully addressed by measures to maintain and enhance ecosystems. What if additional measures are needed for these habitats and species to recover?

Q5. Responses to consultations may be made public. To keep your response anonymous (including email addresses) tick the box.

Keep my response anonymous

Natural Resources Policy development

Page 1: Submit your response

Q1. You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

Name	Julia Stoddart
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Phone number	01350724228
Address	Middle Cardney, Butterstone, Dunkeld PH8 0EY

Q2. If you want to receive a receipt of your response, please provide an email address.
Email address

julia.stoddart@sacs.org.uk

Q3. Written feedback on the priority themes and key objectives within them outlined in this document would be welcome as part of this consultation exercise. In particular, taking into account the legal framework and its requirements as outlined in this document, it would be helpful to receive contributions on: the key steps that need to be taken in order to deliver on the priority themes and address the key challenges; the barriers that need to be addressed.

The Scottish Association for Country Sports (SACS) is Scotland and Northern Ireland's largest representative fieldsports association, with members across the UK – including a significant number in Wales. SACS is a not-for-profit membership association tasked with protecting and promoting our members' rights and their chosen fieldsports activities throughout the UK. We respond to the consultation to inform the development of the Natural Resources Policy as follows:

- The consultation document refers to the importance of key sectors such as water, farming, fisheries, energy, recreation and tourism, but does not mention the fieldsports sector; we refer you to page 26 of the PACEC report (see <http://www.shootingfacts.co.uk/pdf/The-Value-of-Shooting-2014.pdf>) for data that demonstrates the importance of fieldsports to Wales. It is not correct for the consultation document to exclude fieldsports, which in addition to being an importance sector in its own right, is also linked extensively to the other key sectors that are mentioned.

- The Welsh Government should facilitate improved public access to sustainable harvesting of wild game. Hunting in this way reconnects people to their environment, as well as demonstrably improving the wellbeing of participants (see <http://www.shootingfacts.co.uk/pdf/The-Value-of-Shooting-2014.pdf>). In addition, involving members of the public directly in the management of wild game populations, as well as species that are managed because of their impact on agriculture, forestry, freshwater and marine environments, and biodiversity, fosters an improved understanding of sustainability and more mindful usage of resources.

- The fieldsports community comprises individuals, groups and organisations who are key delivery partners in terms of the sustainable management of natural resources; effective and constructive engagement with this community is an opportunity to address many issues within the Key Challenges, and must be part of the Welsh Government's policy.

- More generally, it is important to note that pressure on natural resources will only increase while the human population continues to increase. Technological advances are of limited assistance with mitigating pressure that is driven by population increase, due to per capita consumption levels expanding to fill the gap created by improvements in resource use efficiency (see <https://www.sciencedaily.com/releases/2017/01/170119120234.htm>); therefore, the effectiveness of a natural resources policy will always be limited until human population growth is accounted for.

- Is the Welsh Government sure that 'sustained growth' from finite natural resources is possible?

Q4. If you have any related issues which we have not specifically addressed, please use this space to report them:

Your online form will not allow submission unless the 'keep my response anonymous' box is ticked. For the record, we do not require our response to be kept anonymous.

Q5. Responses to consultations may be made public. To keep your response anonymous (including email addresses) tick the box.

Keep my response anonymous

Natural Resources Policy development

Page 1: Submit your response

Q1. You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

Name	Florence Bullough
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Q2. If you want to receive a receipt of your response, please provide an email address.
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florence.bullough@geolsoc.org.uk

Q3. Written feedback on the priority themes and key objectives within them outlined in this document would be welcome as part of this consultation exercise. In particular, taking into account the legal framework and its requirements as outlined in this document, it would be helpful to receive contributions on: the key steps that need to be taken in order to deliver on the priority themes and address the key challenges; the barriers that need to be addressed.

SUBMISSION TO THE WELSH GOVERNMENT CONSULTATION TO INFORM THE DEVELOPMENT OF THE NATURAL RESOURCES POLICY

1. The Geological Society (GSL) is the UK's learned and professional body for geoscience, with about 12,000 Fellows (members) worldwide. The Fellowship encompasses those working in industry, academia, regulatory agencies and government with a broad range of perspectives on policy-relevant science, and the Society is a leading communicator of this science to government bodies, those in education, and other non-technical audiences.

2. The Geological Society welcomes the publication of the Welsh Government's Natural Resources Policy for consultation and the approach taken to natural resources policy-making. Setting natural resource management in a framework focussing on sustainability and ecosystem resilience as part of a wider holistic approach is an important step forward in environmental policy-making as we seek to live more sustainably and equitably.

3. We previously responded to the Welsh Government's consultation on the Environment Bill where we raised the importance of the geosphere in the ecosystems services approach and we are pleased to see that geological diversity is included in this consultation paper in the context of ecosystem resilience. It is important that references to the geosphere and geological diversity are included in high-level policy documents to ensure that they are fully integrated into subsequent implementation. We are also pleased to see flooding and the quality and productive capacity of soils identified as important challenges that need addressing in the context of ecosystem resilience.

4. The report refers to the need to increase resource efficiency in the context of green economic growth and development but there is little detail on, or reference to, Wales' access to geological resources. Resources such as fossil fuels, minerals, metals and aggregates are mentioned only once (page 12) but there is little discussion of their historic role in underpinning the Welsh economy, the modern legacies of these industries (both positive and negative), or the essential current and future requirements for these resources. Nor is there discussion of how the competing drivers of energy and mineral affordability, security and improved environmental management will be reconciled going forward.

5. Wales, along with the rest of the UK, still needs secure access to subsurface mineral and energy resources. We will continue to require fossil fuels as part of our energy mix for many years, however quickly we move to decarbonise the economy; and beyond that we will need hydrocarbons as chemical feedstocks, as well as minerals of all kinds for a wide variety of uses, to secure the ongoing development and prosperity of Wales. The document's discussion around green growth, resource efficiency and building a circular economy covers an important part of sustainable management but it does not explicitly address these resource needs. The extractive industries should not be conceived of as being inherently antithetical to environmental sustainability – given our long-term dependence on geological resources, this would be an unnecessary admission of failure in our efforts to protect the environment. Rather, we must build on existing best practice and explore new ways to reconcile our resource needs with environmental and societal well-being.

6. The Welsh Government's holistic approach to environmental policy provides an excellent opportunity to take a fresh look at this challenge. As we transition to become a 'greener' society, our requirements for minerals and hydrocarbons will continue and evolve. Many new green technologies, including those for generating renewable energy, will require significant shifts in our mineral resource needs, and rapid growth in production of some metals which are currently produced only in small quantities worldwide. To consider those aspects of energy and resource sustainability that are outlined in the report in isolation from our geological resource needs is to ignore a significant part of the challenge – and of the means at our disposal to address it. This is an area currently being addressed by the International Union of Geological Sciences as part of its Resourcing Future Generations initiative, which is a global effort to address the long-term goal of meeting the world's future natural resource needs sustainably (key documents are at www.geolsoc.org.uk/RFG). The extractive industries of Wales are much reduced compared to the heyday of the coal industry, but there are still significant working extractive industries as well as many tourist and visitor attractions focussed on the strong industrial geological heritage of Wales, and this should be reflected in the Natural Resources Policy. Although the ongoing resource requirements of Wales are not explicitly covered in the Key Challenges as listed at Annex 2, it is nonetheless important that this is addressed in the delivery phase so that Wales' natural resources can be effectively and sustainably managed.

7. We welcome the inclusion of the key challenge of 'Retaining the distinctiveness of our places and historic landscapes' in the report. The geosphere has an important role to play in underpinning and shaping landscapes and controlling the location of natural resources, both of which contribute to the unique visual and cultural identity of Wales. The industrial heritage of Wales is a strong component of its national identity and many former industrial sites have been repurposed as places to learn about the local industrial heritage. In addition to the sites of Wales' industrial heritage which are very popular with visitors and tourists, the stunning landscapes of Wales, themselves a natural resource, are also an enormous draw for visitors and tourists from around the world. The contribution to the Welsh economy of geotourism and initiatives such as the UNESCO Global Geoparks of GeoMôn and Fforest Fawr also needs to be included in the holistic approach to natural resources management.

Q4. If you have any related issues which we have not specifically addressed, please use this space to report them:

The online form required me to click 'Keep my response anonymous' in order to submit. We are happy for the submission to be made public and do not need it to be kept anonymous.

Q5. Responses to consultations may be made public. To keep your response anonymous (including email addresses) tick the box.

Keep my response anonymous

Natural Resources Policy development

Page 1: Submit your response

Q1. You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

Name	Adam Rowe
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Q2. If you want to receive a receipt of your response, please provide an email address.
Email address

adam.rowe@sewbrec.org.uk

Q3. Written feedback on the priority themes and key objectives within them outlined in this document would be welcome as part of this consultation exercise. In particular, taking into account the legal framework and its requirements as outlined in this document, it would be helpful to receive contributions on: the key steps that need to be taken in order to deliver on the priority themes and address the key challenges; the barriers that need to be addressed.

SEWBRcC welcomes the proposals to address the challenges facing the environment in Wales and in particular the challenges to our biodiversity and ecosystems. We believe that actions and policies should be soundly evidence based, and we and the other three Local Environment Record Centres (LERCs) in Wales exist in order to collect and provide evidence about plants and animals in the Welsh environment. Our database of some 3.5 million records in South East Wales, covering more than a century, is a rich source of information which should underpin the conservation work of the Welsh Government through Natural Resources Wales and other public bodies.

The records we collect include the observations of many hundreds of ordinary people who feel passionately about wildlife and who give their time and expertise on a voluntary basis to help to protect it. There is a long tradition in Britain of amateur recorders, and people today feel just as strongly about protecting our wildlife as ever. However, volunteers need an organisational framework to be effective, and a system which engages with them to ensure that their observations are not lost or ignored, but used efficiently and scientifically for the mutual benefit of wildlife and people. This is a role played by the LERCs and by the local Biodiversity/Nature Partnerships. This important work needs support and a sound financial footing, and we would urge the Welsh Government to ensure that the required resources are forthcoming.

Q4. If you have any related issues which we have not specifically addressed, please use this space to report them:

We would also like to draw attention to the important role played by biological reference collections held in museums, particularly at National Museum Wales, Cardiff. These collections provide a vital link to historical biodiversity, reference material for researchers and a vital resource for individuals seeking to improve their specialist skills in identifying many groups of plants and animals. This is a critically important function played by museums in addition to their more widely recognised public educational role. Like many other organisations, our museums have suffered serious reductions in their budgets in recent years. It is vital that they are provided with sufficient resources to maintain their collections.

Q5. Responses to consultations may be made public. To keep your response anonymous (including email addresses) tick the box.

Keep my response anonymous

Natural Resources Policy development

Page 1: Submit your response

Q1. You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

Name	Sarah Bond
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Phone number	01544267605
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	-

Q2. If you want to receive a receipt of your response, please provide an email address.
Email address

No Response

Q3. Written feedback on the priority themes and key objectives within them outlined in this document would be welcome as part of this consultation exercise. In particular, taking into account the legal framework and its requirements as outlined in this document, it would be helpful to receive contributions on: the key steps that need to be taken in order to deliver on the priority themes and address the key challenges; the barriers that need to be addressed.

Introduction

I welcome the opportunity to comment on the proposed Natural Resources Policy.

The consultation document shows Welsh Government's legislative aspirations to be transposed into woolly "feel good" words and I am concerned that the relevant Acts will be lost in translation by this policy. There are many challenges for this policy, not least the long timescale needed to see the vision through to meaningful results. As required by the Environment Act evidence is key and the Welsh Government must take this on board even when that involves uncomfortable truths. The Natural Resources Policy must not be allowed to become a box ticking exercise for quick fixes

Priority 1

Accelerating green growth by increasing resource efficiency, renewable energy and supporting innovation.

One of the greatest challenges to the priority of "green" growth is the tensions created by different demands, (including those within the Environment Act), on the same "natural resource". Resolution of these tensions may need changes to other policy.

An example is the trend towards intensive farming. Quite clearly the nation needs to have food security and a growing population increases pressure towards intensive production. In principle, this is a resource efficient use of land however in practice this is fraught with difficulties. More crops per year result in depleted soils as a result of erosion and nutrient/humus deficiencies. Intensive livestock rearing increases the head per hectare, straining water resources, increasing deposition of pollutants to air, soil and ultimately water. Efficiency of food production must consider the wider ecosystem impacts otherwise farmers will be rightly accused of poor stewardship. How this is delivered is the challenge for the proposed policy.

The potential for urban food production remains largely untapped, yet this would be efficient use of resources such as transport. Urban food production would also help compensate for land take by expanding development.

For another example, under current policy Welsh Government's ambitions for renewable energy are in direct conflict with the need to maintain ecosystems for clean water, flood prevention and climate

change resilience. The continuing drive for onshore wind energy places wind farms on upland that is essential for water systems resilience and carbon sequestration. This is unsustainable and a short sighted quick fix of carbon emissions, NB: NRW SONaRR rates mountain, moorland and heath as under major pressure. Furthermore, placing windfarms on sites remote from where the electricity is mostly used is not resource efficient in terms of the powerline infrastructure needed or the loss of energy during transmission. Any onshore wind energy would be better placed on brownfield sites or by large scale industry such as the wind turbines beside the M40 near Bristol.

A more resource efficient approach to renewable energy would be to pursue waste streams and sewage gas from urban environments and to continue to demand energy efficient buildings. A bonus of using waste streams is that the byproducts can have beneficial use, eg, AD plants could export the heat generated and the end product is a soil improver. It is essential that any resource efficiency factors in transport, therefore something like reuse of waste close to where it is generated is an obvious option.

The challenge to the Natural Resources Policy is that renewable energy policy needs tweaking. Wales needs a good mix of energy sources but this must not be to the detriment of long term resilience of its ecosystems if they are to deliver the other hoped for benefits.

Priority 2

Delivering nature-based solutions to improve resilience and the benefits derived from natural resources.

Challenges to this priority are multiple.

For example, green engineering in urban spaces will require LPA's to revisit urban planning eg, flood corridors; developers to give up a greater percentage of land to biodiversity and green solutions and farmers will be required to take land out of food production. All these will require education to a different mindset.

There is huge potential for local residents to take ownership of their neighbourhood but this empowerment will be diminished if Welsh Government fails to take a truly holistic approach to sense of place and well being, and this applies as much to rural as urban communities. Much "well being" is intangible in short term monetary gain. The challenge will be to create bold policy that reaps the rewards of long term vision.

Priority 3

Improving community and individual well being by taking a place and landscape based approach

The challenges to this priority are somewhat dependent on the resolutions to the previous 2 proposed priorities.

A "landscape based approach" is most logical however it is not clear what Area Statements will entail, but it is hoped that account will be taken of local stakeholders' opinions.

Neither is clear how some "landscape approach" ideas can be achieved when County Councils are already under severe budgetary pressures and some local communities are at breaking point with volunteering. Ecosystems do not work to political timetables. The opportunities for job creation that this priority could deliver needs long term funds.

Conclusion

For the Natural Resources Policy to be meaningful there needs to be commitment to long term results based on a fundamental change of approach to other policies together with much upfront expenditure. To prevent the challenges becoming barriers sufficient funds, (think of a figure and at least double it), will need to be budgeted in order to support those who will "deliver" such as NRW, LPAs and NGOs. There needs to be much more research plus education and funding support for the public and the farming community. There needs to be much more incentive but equally more enforcement for transgressions such as pollution.

Welsh Government's aspirations are laudable but I fear the result will be yet more jobs for consultants whilst our finite natural resources are lost. Wales future should be above politicking and requires truly evidence based policy, even when that is uncomfortable. Ultimately the greatest challenges and barriers to the Natural Resources Policy is budget and true vision

Q4. If you have any related issues which we have not specifically addressed, please use this space to report them:

No Response

Q5. Responses to consultations may be made public. To keep your response anonymous (including email addresses) tick the box.

Keep my response anonymous

Natural Resources Policy development

Page 1: Submit your response

Q1. You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

Name	Ann MacGarry
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Q2. If you want to receive a receipt of your response, please provide an email address.
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Q3. Written feedback on the priority themes and key objectives within them outlined in this document would be welcome as part of this consultation exercise. In particular, taking into account the legal framework and its requirements as outlined in this document, it would be helpful to receive contributions on: the key steps that need to be taken in order to deliver on the priority themes and address the key challenges; the barriers that need to be addressed.

When making decisions or advising about changes in the natural environment (from schemes to install renewable energy to road improvement) it is necessary to give adequate weight to the significance of climate change and biodiversity beyond the very local. As climate change is in many cases the biggest threat to biodiversity, this has to be taken into account in every situation. Public engagement must try to be a true reflection of what the whole of the community thinks, not just the views a vocal minority. It is also important (but not always easy) to differentiate between vested interest and opinion.

Q4. If you have any related issues which we have not specifically addressed, please use this space to report them:

No Response

Q5. Responses to consultations may be made public. To keep your response anonymous (including email addresses) tick the box.

Keep my response anonymous

Natural Resources Policy development

Page 1: Submit your response

Q1. You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

Name	Mark Gahan
Organisation (if applicable)	Severn Wye Energy Agency
Phone number	07908 489988
Address	Gerlan, North Wales

-

Q2. If you want to receive a receipt of your response, please provide an email address.
Email address

No Response

Q3. Written feedback on the priority themes and key objectives within them outlined in this document would be welcome as part of this consultation exercise. In particular, taking into account the legal framework and its requirements as outlined in this document, it would be helpful to receive contributions on: the key steps that need to be taken in order to deliver on the priority themes and address the key challenges; the barriers that need to be addressed.

The Area Statements (AS) will have an important role in delivering the priority themes and in addressing challenges. The legislation highlights that the AS will not be an action plan, but that they will highlight priorities and opportunities. Despite this, some stakeholders involved in the AS development process to date have emphasized how important an action plan will be. Questions regarding who will be responsible or who will take the lead on developments within each area have been raised. NRW explained that the AS is an evidence base, which will be passed on to the PSB, so that the other public bodies can decide on how it fits with other plans. There will be a need for clarity and to ascertain who will be responsible for various outcomes within each Area.

Some stakeholders have also highlighted whether a positive framing of the opportunities relating to the environment could help frame a national approach, which would include a strapline or 'vision' for the environment, such as that taken in New Zealand.

In some way the Welsh Government's natural resources policy will have to address the tension between stakeholder's desire for a template for action at area statement level and the emphasis thus far that identifying opportunities does not mean developing a 'Vision' or accompanying action plan. Could greater clarity/ steer about this process within the policy would be beneficial (especially regarding place based work and role of communities in this process).

Socio-cultural Values

Could the policy encourage the area statements to reflect socio-cultural values within each Area meaningfully? Established wisdom on involvement and participation emphasises the need to design involvement so that the outcomes are meaningful to participants. A challenge is to include individual socio-cultural values and people's priorities within those areas as far as possible and as capacity allows in order to promote ownership and responsibility towards action, so that participation itself has its own sustainability. Clear strategies for involvement and participation with a wide range of audiences and social and political context will be needed to promote action within smaller geographical areas within and across area statement boundaries.

Area Statement Scale

Each of the area trials emphasised how a focus on 'place' made their work effective in terms of involvement and participation. The preference for a 'local' focus by stakeholders involved in the trials, together with a relevance of drivers for change/ opportunities at this scale, emphasises the dilemma of how this learning should/ could be reflected in the new larger area scales. The Area Trials also highlighted the level of time and commitment needed to build relationships to enable delivery, (not least to properly understand and embed local knowledge in identifying risks and opportunities and decision making), which raises another important aspect to consider whilst designing the policy for the delivery stage of the Area Statement process.

Q4. If you have any related issues which we have not specifically addressed, please use this space to report them:

No Response

Q5. Responses to consultations may be made public. To keep your response anonymous (including email addresses) tick the box.

Keep my response anonymous

From: ERF Service Requests & Enquiries [mailto:erf@conwy.gov.uk]
Sent: 20 February 2017 13:38
To: Natural Resource Management
Subject: Welsh Government Consultation - Natural Resources Policy Consultation

Dear Sir/Madam,

I now write to provide our response (highlighted in red below) to your consultation paper relating to the above. Please accept our sincere apologies for missing your deadline.

Question: Written feedback on the priority themes and key objectives within them outlined in this document would be welcome as part of this consultation exercise. In particular, taking into account the legal framework and its requirements as outlined in this document, it would be helpful to receive contributions on:

- the key steps that need to be taken in order to deliver on the priority themes and address the key challenges; and,

Priority Themes:

- Accelerating green growth by increasing resource efficiency, renewable energy and supporting innovation
 - Greater efforts are needed in reducing household / business energy usage. New renewable energy projects would then be able to directly replace unsustainable sources rather than also having to cope with ever increasing demand.
- Delivering nature-based solutions to improve resilience and the benefits derived from natural resources
 - Commencement of SuDS legislation within the Flood & Water Management Act is urgently required to address many of the options highlighted in this theme. Failure to implement this has meant significant opportunities for improvements in this area have already been lost.
 - Coastal zone management and managed realignment solutions are compromised by the delay to maintain and expand the Wales Coastal Monitoring Centre. A consistent and joined-up approach to coastal monitoring is required to fully realise the potential in this area.
 - Provision and maintenance of parks, gardens and other outdoor recreation areas is often the role of local authorities. Improvements in this area are therefore likely to require increased ring-fenced funding. Under recent funding constraints it is unlikely to be sustainable to maintain existing provision.
- Improving community and individual well being by taking a place and landscape based approach

- Again there is little incentive for urban development to identify nature based solutions without SuDS legislation being commenced.
- Further local authority works are identified, again requiring sustainable funding sources to be found to implement and to reverse recent trends.

Key Challenges:

- Safeguarding and increasing our carbon stores
 - Legislate against woodland removal either through planning policy or NRW permitting.
- Maintaining our productive capacity
 - Loss of EU agriculture funding is likely to further increase this challenge and identifying sustainable replacement funding sources is likely to be the first step to ensure losses are minimised before improvements can be considered.
- Reducing the risk of flooding
 - Under current policies there is no reason that new urban development should increase surface water run-off. Implementation of SuDS legislation would also ensure additional benefits to address other challenges.
 - Maintenance and improvement of all coastal flood defences will be an increasing challenge in light of the loss of EU funding and the expected escalation in sea level rise even if carbon reduction targets are met. Unless a significant sustainable funding source can be found it is unlikely that any natural coastal flood defences which do not protect a significant population could be prioritised.
- Improving health and equity
 - As the poorer urban areas identified are those most benefiting from EU funding there is a high likelihood that this will be an impossible challenge to address and will probably become significantly worse.
 - Fly tipping issues would require reversal of recent waste funding cutbacks to be addressed.
- Improving the quality and maintaining the availability of water
 - Enforce discharge consents and clearly publicise the punishments for breaking consent requirements.
 - Charge premium rates for Welsh water not used in Wales and use for funding enforcement and mitigation.
- Improving the quality and connectivity of our habitats

- Policies on housing provision will increase these problems unless SuDS legislation is commenced.
- Retaining the distinctiveness of our places and historic landscapes
 - The sentence relating to this in the consultation document does not make sense.
 - Many historic sites and landscapes are at threat from coastal erosion and are unlikely to be a priority for protection in light of the residential properties at risk of coastal flooding.
- the barriers that need to be addressed.
 - Funding for any proposals will always be the key barrier. Agriculture and coastal defence are highlighted as key areas where potential benefits can be made to natural resources but both areas are currently highly reliant on EU funding. Beyond very short term assurances of replacement funding for ongoing projects no indication has been given that existing funding will be maintained never mind the major increases that will be required in coast protection funding to keep pace with sea level rise.
 - The policy being produced by Ministers following each election is also of concern. This policy requires long-term planning and the potential for a complete alteration by a new government could cause options requiring long timescales to be overlooked in favour of short term fixes which may not be sustainable over the long term. While it is recognised that the policy must be produced in consultation with NRW there is nothing to require NRW advice to be followed.
 - There needs to be incentive for parties to change their procedures. Changes in land use planning and urbanisation are highlighted as having caused significant issues and the policy looks to these areas to make future improvements but gives no incentive for land owners or developers to change current ways of working. With the release of guidance on SuDS in 2016 there is now no reason to further delay commencement of SuDS legislation which would provide a quick win in ensuring new development contributes to improving natural resources.

If you have any related issues which we have not specifically addressed, please use this space to report them:

No additional issues.

If we can be of any other assistance please do not hesitate to get in touch.

Kind regards,

Dyfed Rowlands
Yr Amgylchedd, Ffyrdd a Chyfleusterau / Environment, Roads & Facilities
Cyngor Bwrdeistref Sirol CONWY County Borough Council
Swyddfeydd Mochdre / Mochdre Offices
Bae Colwyn / Colwyn Bay LL28 5AB
Ffon / Tel: 01492 575337
E-bost / Email: erf@conwy.gov.uk

Rydym yn croesawu gohebiaeth yn Gymraeg. Bydd y Cyngor yn ymateb i unrhyw ohebiaeth yn Gymraeg ac ni fydd hyn yn arwain at unrhyw oedi.

We welcome correspondence in Welsh. We will respond to any correspondence in Welsh which will not lead to a delay

Consultation Response Form

Your name: Huw Brunt, Lead Consultant in Environmental Health Protection

Organisation (if applicable): Public Health Wales

email / telephone number: Huw.Brunt@wales.nhs.uk

Your address: Health Protection Division, Public Health Wales, Floor 4, Number 2
Capital Quarter, Tyndall Street, Cardiff CF10 4BZ

Question: Written feedback on the priority themes and key objectives within them outlined in this document would be welcome as part of this consultation exercise. In particular, taking into account the legal framework and its requirements as outlined in this document, it would be helpful to receive contributions on:

- the key steps that need to be taken in order to deliver on the priority themes and address the key challenges; and,
- the barriers that need to be addressed.

If you have any related issues which we have not specifically addressed, please use this space to report them:

Public Health Wales supports the development of the Natural Resources Policy. From a public health perspective we recognise and actively promote strategies and initiatives that improve all aspects of physical and mental health and the fundamental link between natural resources and health benefits. Health is central to the sustainable management of natural resources.

It is recognised that the NRP is a part of a wider policy delivery framework for sustainable natural resource management and use. Public Health Wales would welcome the opportunity to engage with this process further to maximise opportunities link connect and integrate public health with work around natural resources priorities such as climate change, air pollution and other environmental hazards.

On a more local level, evidence for the area statements needs to complement evidence and data to support and inform local well-being plans. The sustainable management of natural resources must be inclusive of all aspects of society including the care and needs of the poorest and most vulnerable. This requires integration and coordination with wider health and wellbeing initiatives and plans. Directors of Public Health, supported by local and national public health specialists, have a valuable contribution to make to local air and noise quality management. Their influence can extend beyond the NHS and can help shape public health improvement and protection actions across sectors.

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here:

☐

Natural Resources Policy development

Page 1: Submit your response

Q1. You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

No Response

Q2. If you want to receive a receipt of your response, please provide an email address.
Email address

No Response

Q3. Written feedback on the priority themes and key objectives within them outlined in this document would be welcome as part of this consultation exercise. In particular, taking into account the legal framework and its requirements as outlined in this document, it would be helpful to receive contributions on: the key steps that need to be taken in order to deliver on the priority themes and address the key challenges; the barriers that need to be addressed.

Climate change identified as key risk for sustainable management of natural resources. Greater use of renewable energy key to address climate change. Priority theme for acceleration of green growth by increasing resource efficiency, renewable energy and supporting innovation identified which Natural Power fully supports. The consultation identifies how wind, hydro, solar power and biomass have significant potential for further growth both on land at sea.

Onshore wind is the cheapest form of renewable electricity and Wales offers very good wind resource. In order to maximise the potential in Wales, major grid upgrades required in order to deliver this, which would further future proof distributed generation and the move to electrification of transport and heating.

In a levelised cost of energy and subsidy free market, there is a need to move towards cheaper and more productive renewable production, therefore increase in turbine tip height likely to be a key consideration in making a site economically viable. There needs to be recognition by consultees that the market has changed significantly, and so must the acceptance of taller turbines in landscapes that can accommodate this and so forth. Planning timescales needs to be kept to a reasonable timeframe with sensible expectations from consultees on application content. The uncertainty in the energy market in Wales is evident and measures need to be put in place, along with strong and clear messages to encourage investment here with a stable regulatory and price regime.

TAN 8 is now +11 years old, and should there be a review of this advice note to reflect new and updated technologies and the change in the market?

Onshore wind projects often support a Habitat Management Plan, which can support restoration of peatlands safeguarding Wales' natural carbon stores, being another aim of the policy, therefore onshore wind should be encouraged, with protective measures for those sites within peatland.

With regards to 'delivering nature-based solutions to improve resilience and the benefits derived from natural resources' natural flood management should be a key focus area, which needs to be integrated into the development process in the uplands, much like Sustainable Drainage Systems (SUD) are in the urban and lowland areas. There is a need to complete a detailed cost/benefit analysis of hard/soft/natural management solutions across Wales and use this analysis to provide clear source of funding for natural flood management from existing flood protection budget. Flood management offers habitat and biodiversity gains, which in turn can benefit tourism and wellbeing, in addition to the obvious property protection.

Q4. If you have any related issues which we have not specifically addressed, please use this space to report them:

No Response

Q5. Responses to consultations may be made public. To keep your response anonymous (including email addresses) tick the box.

Keep my response anonymous