# Consultation Response Form

**WG Number: WG48598**

Welsh Government

Consultation response form

Consultation on Securing a Sustainable Future: Environmental Principles, Governance and Biodiversity targets for a Greener Wales

Date of issue: 30 January 2024

Action required: Responses by 30 April 2024

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Mae’r ddogfen hon ar gael yn Gymraeg hefyd / This document is also available in Welsh

Rydym yn croesawu gohebiaeth a galwadau ffôn yn Gymraeg / We welcome correspondence and telephone calls in Welsh

## Overview

This White Paper sets out proposals for a Bill to cover three key areas and invites views from interested parties:

1. Embedding environmental principles into Welsh law;
2. Environmental Governance, including the establishment of an environmental governance body for Wales; and
3. A statutory targets framework to protect and restore biodiversity in Wales

### How to respond

Please respond by completing the online form or completing this questionnaire and sending it to: [environmental.governance@gov.wales](mailto:environmental.governance@gov.wales)

If you intend to respond in writing, please send completed forms to:

Land, Nature and Forestry

Climate Change Division

Welsh Government

Cathays Park

Cardiff

CF10 3NQ

### Further information and related documents

Large print, Braille and alternative language versions of this document are available on request.

| Data Protection |
| --- |
| The Welsh Government will be data controller for any personal data you provide as part of your response to the consultation. Welsh Ministers have statutory powers they will rely on to process this personal data which will enable them to make informed decisions about how they exercise their public functions. Any response you send us will be seen in full by Welsh Government staff dealing with the issues which this consultation is about or planning future consultations. Where the Welsh Government undertakes further analysis of consultation responses then this work may be commissioned to be carried out by an accredited third party (e.g., a research organisation or a consultancy company). Any such work will only be undertaken under contract. Welsh Government’s standard terms and conditions for such contracts set out strict requirements for the processing and safekeeping of personal data.  In order to show that the consultation was carried out properly, the Welsh Government intends to publish a summary of the responses to this document. We may also publish responses in full. Normally, the name and address (or part of the address) of the person or organisation who sent the response are published with the response. If you do not want your name or address published, please tell us this in writing when you send your response. We will then redact them before publishing.  You should also be aware of our responsibilities under Freedom of Information legislation.  If your details are published as part of the consultation response then these published reports will be retained indefinitely. Any of your data held otherwise by Welsh Government will be kept for no more than three years. |

| Confidentiality |
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| Responses to consultations may 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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| **Name** |  | |
| **Are you responding as an individual or as an organisation?** | Individual |  |
| Organisation | **x** |
| **Please give the name of the organisation you are responding on behalf of (if applicable)** | **Confor** |  |
| **Are you or your organisation based in Wales?** | Yes |  |
| No | x |
| **Email address** | **Elaine.Harrison@confor.org.uk** | |
| **Post Code** | **EH2 2JG** | |

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| **If responding on behalf of an organisation, please indicate which of these bests represent your organisation (please select only one)** | Umbrella organisation |  |
| Public Sector |  |
| Individual business |  |
| Third Sector/ Charity | x |
| Trade Union/Representative | x |
| Research/Academia |  |
| Individual |  |
| Other |  |

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| **Do you or your organisation have a specific involvement in any of the primary sector fields (please select all that apply)?** | Agriculture |  |
| Fishing |  |
| Forestry | x |
| Mining & Minerals |  |
| Water |  |
| Gas & Electricity |  |

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| **Do you or your organisation have a specific involvement in any of the emissions sectors (please select all that apply)?** | Energy and Heat Generation |  |
| Transport |  |
| Residential Buildings |  |
| Industry and Business |  |
| Agriculture |  |
| Forestry and Land Use | x |
| Waste Management |  |
| Public Sector |  |
| None of the above/not applicable |  |

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| **Does your organisation have a specific focus on any of the following (please select all that apply)?** | Skills | x |
| Health |  |
| Sustainability | x |
| Poverty alleviation |  |
| Age (e.g., youth, older people) |  |
| Disability |  |
| Gender reassignment |  |
| Marriage and civil partnerships |  |
| Pregnancy and maternity |  |
| Race |  |
| Religion or belief |  |
| Sexual orientation |  |
| Welsh language |  |
| None of the above/not applicable |  |

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| **If you are responding as an individual, do you identify as Welsh speaking?** | Yes |  |
| No |  |

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| **If you responding as an individual, what age bracket are you in?** | Under 18 |  |
| 18-34 |  |
| 35-49 |  |
| 50-64 |  |
| 65+ |  |

# 

# Questions

**Part A – Environmental Principles**

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| * **EP1: To what extent do you agree or disagree with the proposals relating to the preparation of guidance that will explain how the environmental principles are intended to be interpreted?** | | | | |
| Strongly Agree | Agree | Neither Agree nor Disagree | Disagree | Strongly Disagree |
|  | **x** |  |  |  |

If you would like to explain your answer, please use the text box below.

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| It makes sense, as since leaving the EU environmental principles have changed and these structures no longer apply to Wales. Environmental governance is a devolved matter, so the Senedd need to make legislation that embed environmental principles into Welsh Law and to establish an environmental body.  The 5 environmental principles: integration, precautionary, prevention, rectification at source and polluter pays are all principles that make sense and would not have a detrimental effect on the forestry industry in Wales, and in many ways the planting of trees would be encouraged to aid mitigation.  The largest issue the forestry sector has faced in terms of woodland creation has been the interpretation of SMNR guidance by NRW and nobody willing to move on it to be pragmatic this has meant targets have been missed creating a stalemate situation. |

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| * **EP2: The Welsh Government proposes to place a duty on Welsh Ministers to have due regard to the environmental principles and accompanying guidance during the development of their policies and legislation. To what extent to you agree or disagree with this approach.** | | | | |
| Strongly Agree | Agree | Neither Agree nor Disagree | Disagree | Strongly Disagree |
|  | **X** |  |  |  |

If you would like to explain your answer, please use the text box below.

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| It is welcomed by Confor that when embedding environmental principles, the contribution to sustainable development is referred to as this is a key part of developing and expanding the Welsh forestry and timber industry. It is, however, important that ministers ensure policies and legislation work together and no against each other. There is competition for land and resources for multiple benefits and sectors need to work together harmoniously. It is crucial that integration of departs work together. |

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| * **EP3: Do you have any views on whether a separate duty should be placed on Welsh public bodies (other than the Welsh Ministers) to apply the principles and accompanying guidance? If you consider the duty should apply to Welsh public bodies, please set out in the text box below which Welsh public bodies and why, as well as any views you have on how the duty should apply to those bodies.** | | | | |
| Strongly Agree | Agree | Neither Agree nor Disagree | Disagree | Strongly Disagree |
|  |  | **X** |  |  |

If you would like to explain your answer, please use the text box below.

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| The duty should be much more around having a proactive approach to land management rather than a hold fire and say no, if the nation does not evolve with the changing needs of the world and society, too much effort will go into saving what is already lost and leave a barren landscape. |

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| * **EP4: Do you have any additional comments relating to the Welsh Government’s intention to embed the environmental principles and overarching objective into Welsh law that are not captured in your answers to the above questions?** |
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**Part B Establishing an Environmental Governance Body for Wales**

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| * **GB1 - To what extent do you agree or disagree with the proposed purpose and objectives for the new Welsh environmental governance body?** | | | | |
| Strongly Agree | Agree | Neither Agree nor Disagree | Disagree | Strongly Disagree |
|  | **X** |  |  |  |

If you would like to explain your answer, please use the text box below.

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| It makes sense that Welsh Government what to establish a new governance body for Wales. England has the Office for Environment Protection (OEP) and Scotland has the Environmental Standards Scotland (ESS) which support and protect these requirements.  It mentions in the consultation that it will provide oversight of the implementation of compliance with environmental law in Wales by Welsh public authorities. Under the Air Quality Act WG proposed to plant 180,000 ha of trees by 2050 it is important these commitments are taken to account and policies and promises from the Senedd are actioned. |

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| * **GB2: To what extent do you agree or disagree with the governance body’s proposed strategy and reporting requirements?** | | | | |
| Strongly Agree | Agree | Neither Agree nor Disagree | Disagree | Strongly Disagree |
|  | **X** |  |  |  |

If you would like to explain your answer, please use the text box below.

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| It makes sense the body will monitor the environmental targets; it is important that these are taken to account will clear decisions and appeals. It is important that all facts are considered as many environmental issues are multi-faceted.  It is important o have an organisation at an arm’s length from Welsh government to provide impartial advice and it is important to ensure the recruitment for the body is diverse as possible to ensure a good representation of views.  The organisation must have industry professionals in it, who actually know what they are talking about, and the appeals board should be independent. There is a risk that the new body has the same NRW approach of saying No is a safe place. |

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| * **GB3: We propose that the remit of the governance body should apply to the Welsh Ministers and the relevant Welsh public authorities exercising environmental functions Wales listed in Annex 2. To what extent do you agree or disagree with this?** | | | | |
| Strongly Agree | Agree | Neither Agree nor Disagree | Disagree | Strongly Disagree |
|  | **X** |  |  |  |

If you would like to explain your answer, please use the text box below.

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| There are 28 public bodies listed in Annex 2, although these seem applicable the body needs to firstly ensure it has the budget and resources to work at this scale.  Would it work better to create a tiered time frame with:   * Part 1: the initial creation and monitoring of public bodies to include the 4 initial bodies – Welsh ministers, NRW, local authorities and ministers of the crown (if this is to be done in a devolved way?), * Part 2: the additional bodies mentioned in appendix 2. |

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| * **GB4: Are there any other public authorities, or private bodies exercising functions of a public nature, that you think should be added to (or removed from) the list in Annex 2? Please use the text box below to explain your answer.** |

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| * **GB5: To what extent do you agree or disagree with the proposed scope and role for the governance body in relation to monitoring and reporting, including the scrutiny of statutory targets?** | | | | |
| Strongly Agree | Agree | Neither Agree nor Disagree | Disagree | Strongly Disagree |
|  | **X** |  |  |  |

If you would like to explain your answer, please use the text box below.

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| It is important to scrutinise statutory targets – this is currently not being undertaken and is an issue on progressing forward.  There seems to be a cross over of functions it needs to be clear when this organisation is developed what it will do, and what other organisations will stop doing, so it is clear who is providing the functions and there is no duplication of work or conflict of information.  With the monitoring and reporting and scrutiny of strategy targets, Confor welcomes the opportunities to work with the body to provide support and advice from the forestry and wood sector where appropriate.  Whilst analysing data is useful it should not be the organisations main objectives; the objectives should be to make the targets happen and empower staff to do that. |

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| * **GB6: To what extent do you agree or disagree with the proposed scope and role of the governance body’s advisory functions?** | | | | |
| Strongly Agree | Agree | Neither Agree nor Disagree | Disagree | Strongly Disagree |
|  |  | **x** |  |  |

If you would like to explain your answer, please use the text box below.

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| It is ambitious and if there is the budget and resources it could potentially achieve this, but it is not clear how the Welsh government intend to cost this into the overall budgets. Is less going to go to NRW and other bodies or is the money going to come from another area, money and resource is tight, it needs to ensure this is the best value for money and efficiency. There is scope to make more public money by ensuring the WGWE is managed to the best silvicultural standard, the standard is slipping and there is an estimated net loss of £31 million of overstood timber (timber ready to be harvested) on the public forest: this could be managed better, if this body managed to alleviate these problems then the body may have a chance of creating improved public financing along with other environmental benefits. |

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| * **GB7: To what extent do you agree or disagree with the suggested approach for managing complaints and representations** | | | | |
| Strongly Agree | Agree | Neither Agree nor Disagree | Disagree | Strongly Disagree |
|  | **X** |  |  |  |

If you would like to explain your answer, please use the text box below.

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| An open and transparent procedure is important. There is need to mitigate against bias and there needs to be a range of experts on the panels.  Time frame of complaints needs to be considered – processes can be costly and stressful for those involved. |

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| * **GB8: To what extent do you agree or disagree with the proposals to enable the body to investigate?** | | | | |
| Strongly Agree | Agree | Neither Agree nor Disagree | Disagree | Strongly Disagree |
|  | **X** |  |  |  |

If you would like to explain your answer, please use the text box below.

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| It makes sense the body can request or commission additional information in a investigation. It makes sense the body would want to understand the potential failure, it is also important to ensure the information gathered helps wider understanding on how to reduce these occurrences in the future.  If it does not investigate all alleged failures to comply with the law, evidence and justification needs to be undertaken to reduce any potential bias in the system. |

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| * **GB9: To what extent do you agree or disagree with the Welsh Government’s proposed process for formally handling non-compliance through compliance notices and court or tribunal procedures?** | | | | |
| Strongly Agree | Agree | Neither Agree nor Disagree | Disagree | Strongly Disagree |
|  | **X** |  |  |  |

If you would like to explain your answer, please use the text box below.

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| An escalation approach makes sense.  A single approach to non-compliance makes it simple to follow and understand.  A proposed Welsh first-tier tribunal: yet to have established legislation from the Senedd to implement this, does create a weak plan. To a sole Welsh tribunal makes it applicable to Wales but does Wales have the budget and resource to instigate this? What is cheaper and more efficient are existing systems just as good? - to use the high court, or the tier one tribunal of England and Wales? |

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| * **GB10: To what extent do you agree or disagree with the Welsh Government’s proposal to include improvement reports / plans as an enforcement stage to provide space for resolution where systemic issues are evident, and a compliance notice is not considered the optimal mechanism to address the issue.** | | | | |
| Strongly Agree | Agree | Neither Agree nor Disagree | Disagree | Strongly Disagree |
|  |  | **X** |  |  |

If you would like to explain your answer, please use the text box below.

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| How would it work with cross boarder issues – 2 of the largest and most polluted rivers in Wales cross in and out of Wales/England. The same applies for landholdings, river catchments, plant/animal diseases, many issues are at landscape scale and are boarder blind. |

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| * **GB11: To what extent do you agree or disagree with the proposal for the governance body to, by exception, be able to apply for judicial review and / or intervene in civil proceedings** | | | | |
| Strongly Agree | Agree | Neither Agree nor Disagree | Disagree | Strongly Disagree |
|  | **X** |  |  |  |

If you would like to explain your answer, please use the text box below.

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| It makes sense if the issue is urgent judicial review can occur without going through the enforcement process. It is important that what constitutes as serious/urgent is identified in the bodies strategy and this is consulted on. |

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| * **GB12: The Welsh Government consider financial penalties would be an ineffective and, in some cases, counterproductive method by which to remedy the non-compliance of Welsh public authorities with environmental law. To what extent do you agree or disagree with this position?** | | | | |
| Strongly Agree | Agree | Neither Agree nor Disagree | Disagree | Strongly Disagree |
|  | **X** |  |  |  |

If you would like to explain your answer, please use the text box below.

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| Fining public body does not make sense, but it is important to hold the public body to account. Decisions and people accountable for these decisions need to be taken to account. It is important lessons are learnt to reduce recurrence. |

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| * **GB13: Our preferred model for the governance body is a ‘Commission’, but consider alternative models, such as an arms-length body, could provide similar benefits. To what extent do you agree or disagree with this approach?** | | | | |
| Strongly Agree | Agree | Neither Agree nor Disagree | Disagree | Strongly Disagree |
|  | **x** |  |  |  |

If you would like to explain your answer, please use the text box below.

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| The overlap of work is a waste of money and resource and this needs to be prevented.  If the body is to hold these public bodies to account working in partnership would create a potential bias to be objective. |

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| * **GB14: To what extent do you agree or disagree with the Welsh Government’s approach in respect of appointing members and allocating resources to the governance body?** | | | | |
| Strongly Agree | Agree | Neither Agree nor Disagree | Disagree | Strongly Disagree |
|  | **x** |  |  |  |

If you would like to explain your answer, please use the text box below.

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| It is important to ensure a representative from the forestry sector is on the board to ensure these views are heard too.  Decisions made need to be transparent and evidence led. |

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| * **GB15: Are there any other views you would like to provide in relation to our proposals to set up a governance body?** | | | | |
| Strongly Agree | Agree | Neither Agree nor Disagree | Disagree | Strongly Disagree |
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If you would like to explain your answer, please use the text box below.

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**Part C: Targets for the Protection and Restoration of Biodiversity**

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| * **BT1: To what extent do you agree or disagree with the inclusion within the Bill of the Wales Nature Recovery Framework proposed in the paper?** | | | | |
| Strongly Agree | Agree | Neither Agree nor Disagree | Disagree | Strongly Disagree |
|  | **X** |  |  |  |

If you would like to explain your answer, please use the text box below.

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| It is agreed this is important and it is agreed that the balance between ambition and targets need to be achievable. Confor would be keen to be involved in the stakeholder engagement with the codesign of these targets, it is important the indicators, targets and milestones identified and include forestry are met and with minimal conflict between the areas. It makes sense to use SMART objectives for the goals and that these are reviewed.  As stated, the citizens of Wales have a right to know about the quality of their environment and this includes the state and health for forests and woodlands and accountability is needed here.  It makes sense to seek independent/expert advice on why targets have not been met. |

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| * **BT2: To what extent do you agree or disagree with the inclusion within the Bill of the statutory nature positive headline target: ‘*to reverse the decline in biodiversity with an improvement in the status of species and ecosystems by 2030 and their clear recovery by 2050’.*** | | | | |
| Strongly Agree | Agree | Neither Agree nor Disagree | Disagree | Strongly Disagree |
|  | **x** |  |  |  |

If you would like to explain your answer, please use the text box below.

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| It makes sense, but seems impossible, 26 years to reverse 200 years of damage in an overpopulated world with a changing climate. |

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| * **BT3: To what extent do you agree or disagree with the proposal to include a duty that the Welsh Ministers must set statutory biodiversity targets in secondary legislation?** | | | | |
| Strongly Agree | Agree | Neither Agree nor Disagree | Disagree | Strongly Disagree |
|  | **X** |  |  |  |

If you would like to explain your answer, please use the text box below.

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| Makes sense and that these have be reviewed and adjusted accordingly. |

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| **BT4: Potential suite of supporting targets, to underpin the headline target, are likely to be:**   * **Species – distribution abundance and extinction risk;** * **Habitat – protection, management and restoration; and** * **Ecosystem health and resilience – recognising the key role and contribution of ecosystems**   **To what extent do you agree or disagree with the key areas proposed for the biodiversity targets to be introduced in secondary legislation in the Wales Nature Recovery Framework?** | | | | |
| Strongly Agree | Agree | Neither Agree nor Disagree | Disagree | Strongly Disagree |
|  | **X** |  |  |  |

If you would like to explain your answer, please use the text box below.

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| * **BT5: To what extent do you agree or disagree that Natural Resources Wales reports on the biodiversity targets as part of the State of Natural Resources Report?** | | | | |
| Strongly Agree | Agree | Neither Agree nor Disagree | Disagree | Strongly Disagree |
|  | **X** |  |  |  |

If you would like to explain your answer, please use the text box below.

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| This creates clear timelines on when these reports will be undertaken and allows the collection of data, but it needs to be efficient and quick. |

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| * **BT6. To what extent do you agree or disagree that Welsh Ministers publish a statement, before the Senedd, to report whether the statutory biodiversity targets have been met by the date specified in regulation?** | | | | |
| Strongly Agree | Agree | Neither Agree nor Disagree | Disagree | Strongly Disagree |
|  | **x** |  |  |  |

If you would like to explain your answer, please use the text box below.

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| It should allow the Senedd and stakeholders to read and question ministers on the content. |

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| * **BT7. To what extent do you agree or disagree with the proposal that Welsh Ministers be required to produce a statutory long term Wales Nature Recovery Strategy, outlining the approach to delivery of the statutory targets as well as the Welsh Government’s response to the Global Biodiversity Framework?** | | | | |
| Strongly Agree | Agree | Neither Agree nor Disagree | Disagree | Strongly Disagree |
|  | **X** |  |  |  |

If you would like to explain your answer, please use the text box below.

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| * **BT8. To what extent do you agree or disagree that the Wales Nature Recovery Action Plan sets out a detailed programme of work required to deliver the statutory biodiversity targets?** | | | | |
| Strongly Agree | Agree | Neither Agree nor Disagree | Disagree | Strongly Disagree |
|  |  | **x** |  |  |

If you would like to explain your answer, please use the text box below.

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| As long as: there are the resources to do this, it will be consistent around Wales, stakeholders can feed in comments, and it is reviewed and consulted on.  There is a fear there will be more people writing up plans than taking action to ensure change. |

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| * **BT9. To what extent do you agree or disagree that there should be a duty on public authorities which requires them to contribute to the delivery of the statutory biodiversity targets?** | | | | |
| Strongly Agree | Agree | Neither Agree nor Disagree | Disagree | Strongly Disagree |
|  | **X** |  |  |  |

If you would like to explain your answer, please use the text box below.

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| * **BT10. To what extent do you agree or disagree that named public authorities should produce a Local Nature Recovery Action Plan to outline local action and priorities for delivery of the statutory biodiversity targets?** | | | | |
| Strongly Agree | Agree | Neither Agree nor Disagree | Disagree | Strongly Disagree |
|  | **X** |  |  |  |

If you would like to explain your answer, please use the text box below.

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| Start by using the proposed shorter list, who would make the most impact, then review later if there is capacity to expand on this. |

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| * **BT11. Please indicate whether you would prefer the duties proposed in this section to apply to:** | |
|  | Please indicate preference |
| 1. List of Welsh public authorities has been included at Annex 2 |  |
| 1. The shorter list of Welsh public authorities included at Annex 6 | **This one, at least initially** |

If you would like to explain your answer, please use the text box below.

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| --- |
| **Are there any other views you would like to provide in relation to the proposals in this White paper?** |
| A whole extra body perhaps might be overkill, with the restrictions of public budget and effectiveness of this organisation would a panel suffice? With the chair being an environmental lawyer, the board to be of high calibre of industry professionals that can hold public bodies and the Senedd to account. If this panel met once a month plus any additional work needed the budget would be far less and potentially far more effective. |