

Agenda – Climate Change, Environment, and Infrastructure Committee

Meeting Venue:

Committee room 2 Senedd and video

Conference via Zoom

Meeting date: 5 November 2025

Meeting time: 09.30

For further information contact:

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Committee Clerk

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Hybrid

Private pre-meeting (09.15–09.30)

Public meeting (09.30–10.45)

1 Introductions, apologies, substitutions, and declarations of interest

(09.30)

2 Evidence session with Dŵr Cymru Welsh Water

(09.30–10.45)

(Pages 1 – 22)

Peter Perry, Chief Executive Officer, Dŵr Cymru Welsh Water

Sam James, Managing Director, Commercial, Dŵr Cymru Welsh Water

Martin Driscoll, Business Support & People Director, Dŵr Cymru Welsh Water

Attached Documents:

Research brief – Dŵr Cymru Welsh Water’s Trawsnewid programme

Paper – Dŵr Cymru Welsh Water

3 Papers to note (10.45)

3.1 Legislative Consent: Planning and Infrastructure Bill

(Pages 23 – 24)



Attached Documents:

Letter from the Cabinet Secretary for Economy, Energy and Planning to the Chair in relation to the Legislative Consent Memorandums for the Planning and Infrastructure Bill

3.2 The response to recent storms

(Pages 25 – 46)

Attached Documents:

Response from the Deputy First Minister and Cabinet Secretary for Climate Change and Rural Affairs to the Chair in relation to the Committee's report: The response to recent storms

Response from Natural Resources Wales to the Chair in relation to the Committee's report: The response to recent storms

3.3 Producer Responsibility Obligations (Packaging and Packaging Waste) (Amendment) Regulations 2025

(Pages 47 – 48)

Attached Documents:

Letter from the Deputy First Minister and Cabinet Secretary for Climate Change and Rural Affairs to the Chair in relation to the Producer Responsibility Obligations (Packaging and Packaging Waste) (Amendment) Regulations 2025

3.4 Office for National Statistics and Government Statistical Service consultations

(Page 49)

Attached Documents:

Letter from the UK Statistics Authority to the Chair in relation to the Office for National Statistics and Government Statistical Service consultations

3.5 UK–EU implementation review of the Trade and Cooperation Agreement

(Pages 50 – 69)

Attached Documents:

Response from the Cabinet Secretary for the Economy, Energy and Planning to the Cross Committee report on UK–EU implementation review of the Trade and Cooperation Agreement

3.6 Cardiff Airport

(Pages 70 – 72)

Attached Documents:

Response from the Cabinet Secretary for Economy, Energy and Planning to the Chair in relation to subsidy support to Cardiff Airport

3.7 United Kingdom Internal Market Act 2020 (Exclusions from Market Access Principles: Glue Traps) Regulations 2025

(Page 73)

Attached Documents:

Letter from the Deputy First Minister and Cabinet Secretary for Climate Change and Rural Affairs to the Chair in relation to the Kingdom Internal Market Act 2020 (Exclusions from Market Access Principles: Glue Traps) Regulations 2025

4 Motion under Standing Order 17.42 (vi) and (ix) to resolve to exclude the public from the remainder of this meeting (10.45)

Private meeting (10.45–11.00)

5 Consideration of evidence received under item 2

Document is Restricted

Llyr Gruffydd MS
Chair, Climate Change, Environment & Infrastructure Committee
Welsh Parliament
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21 October 2025

Dear Chair

Further to the email received from the Clerk of the Committee requesting further information on our recently announced transformation programme (Trawsnewid) and the disruption to water supplies experienced by customers in Flintshire, I have provided some further information below ahead of giving oral evidence on 5th November where I will be joined by my colleagues Samantha James (Managing Director Commercial) and Martin Driscoll (Business Support and People Director).

Trawsnewid – our transformation programme

As the committee is aware, the water sector has been under considerable scrutiny for several years, and is facing many challenges, most notably increasing customer expectations, increasing environmental obligations and the need to adapt aging infrastructure to the impact of climate change.

Having joined Dŵr Cymru as an apprentice over 45 years ago, I've never witnessed a time when the company and the wider sector has been under so much pressure, nor where customer and stakeholder expectations are so high, that realistically meeting them at an affordable cost will require investment over a sustained long-term period.

Each of the challenges we face requires us to change as a company, and many of these changes require us to transform how we operate and deliver services. This transformation will not be delivered overnight, and we need to recognise that 'change' will be a constant in our organisation over the next few years. Our customers and stakeholders are demanding change, and we are responding to those calls.

As Sir John Cunliffe notes in the foreword to his Independent Water Commission's report on reform of the water sector, *"There is no single, simple change, no matter how radical, that will reset the water sector and restore the trust that has been lost. This sector requires fundamental reform on all sides – how we manage the demands on water, how the system is regulated, how companies are governed and how we manage the critical infrastructure on which we all rely."* I wholeheartedly agree with the sentiment of these words, and it

is within this context that our transformation programme – known within the company as Trawsnewid – has been designed and implemented.

Whilst the change needed applies to all interested parties – including Government who set policy direction, regulators who set standards, determine investment priorities and the level of customer bills, and water companies who are responsible for delivering and maintaining the services within the set financial, legislative and regulatory parameters – our Trawsnewid programme is a root and branch review of how Welsh Water works (i.e. process, resource levels etc) and how we deliver the key priorities our customers want and expect.

Although a key objective of the programme is to reduce our costs significantly – and some of this will be delivered through reducing the number of people employed by the company by approximately 500 full time equivalent roles over the next 18-24 months – the programme is also looking to improve how we work including simplifying processes, improving our use of data and artificial intelligence, improving our contract and supplier management and reviewing how we undertake our capital investment programme. Broadly half our planned savings will come from reduced employment costs and the remaining 50% from other areas outlined above.

I would like to emphasise that the transformation programme and associated redundancies are not a negative reflection of the workforce of the company. The approx. 4,000 people who currently work for Welsh Water are of the highest calibre and our decision to reduce the workforce is out of necessity, not desire.

For the record, I would like to state my sincere thanks to every colleague who currently works for the company or have worked for the company during my time as Chief Executive, and with me through many different roles over the course of the past 45 years. Welsh Water is dependent on the skills, dedication and hard work of our workforce. Much of what they do goes un-noticed by the wider public, politicians and stakeholders, yet they work tirelessly and often in very difficult conditions, to deliver a vital public service – one that our health, environment and economy are dependent on.

Despite many criticisms and challenges in recent years, my colleagues across the business continue to support our customers and the communities we serve. In this context, any redundancy programme is even more difficult – but I have no doubt that future Welsh Water employees will continue to strive to deliver first class support in everything they do. However, I take great pride in the work of colleagues across the business to maintain customer service standards which are amongst the best in the sector and was therefore pleased that we were placed 3rd in the sector for Ofwat's C-Mex measure of customer satisfaction in 2024/25.

The reasons for the Transformation Programme

Earlier this year, customers' bills were increased by an average of 27% to cover the increased cost of meeting our regulatory and investment obligations – the increase for some customers will have been significantly more. Within this context, we have a duty to review our activity to ensure we are providing value for money for our customers and that we're working as efficiently as possible so that bills are no higher than they must be. In addition to this, there are several other reasons for the need for our transformation as outlined below.

1. Credit Rating downgrade:

- We have historically had one of the strongest credit ratings in the sector and this, together with the absence of shareholders, has provided us with lower borrowing costs compared to other companies in the sector. However, earlier this year, the sector was downgraded by the credit rating agencies due to what they perceived to be increased uncertainty in the sector, punitive penalty regimes from regulators and wider political and public scrutiny.
- Credit ratings are a crucial factor in the sustainable financing of the company. The entire water sector in England and Wales raises long-term bonds on the debt markets to fund its investment needs. We repay these bonds (and pay the associated interest charges) through the revenue we raise through customer bills over a longer period (usually over 25 years) so that today's customers aren't paying for the full investment cost that future customers will also benefit from.
- Whilst our ratings remain on par with the best performers in the sector, our borrowing costs have increased due to the sector-wide downgrade, and we need to reduce our own costs to ensure long-term financial stability. To put the impact of a credit downgrade into context, every 0.25% increase in borrowing costs add £7.5m in interest per year.
- For the reasons I have outlined, since the formation of Glas Cymru, the financial markets have shown a great deal of interest in the bonds we have issued and in the past 13 months we've raised £1.2bn in "sustainability" bonds. Over the course of the next 4 years we need to raise a further £3bn of new funding, or to meet refinancing needs. Even with the advantages that we have, the impact therefore of any increase in borrowing costs will be significant.
- The privatised companies in England can raise equity injections to boost investment or shore-up their finances. As a company without shareholders, Welsh Water is unable to raise traditional equity funding to provide a cash injection. We are dependent on customers as our sole source of revenue and therefore our costs and ambitions must be balanced with what they can afford.
- We must therefore reduce our operational expenditure to maintain credit ratings to finance the business to meet future investment needs at an affordable price.

2. Operational Performance:

- Our operational performance is not currently where it needs to be in some areas, or where we want it to be. Standards and targets increase each year and I take some reassurance that overall environmental performance is significantly better than it was only 10 years ago – although the targets which we must now reach to attain the 3* or 4* Environmental Performance Assessment that we aspire to and last held in 2021, are now far tougher, making them far more difficult to achieve.
- We must therefore improve our processes, use data and artificial intelligence to make our decision-making and investigations more efficient, and ensure every contract is delivering good value for money. A good example of how technology is making us more efficient and reducing cost is the new AI-driven data analysis tool we use to review our sewer network identify potential blockages before they occur, allowing our teams to get to site quicker and prevent environmental pollution.
- Our transformation programme is identifying such opportunities for improvement and ensuring sufficient investment is targeted at the issues that our customers consider to be priorities.

3. Impact of aging infrastructure and impact of climate change:

- In recent years, Wales has seen the impact of climate change more than most areas of the UK. As a country on the western seaboard of the UK, we bear the brunt of storms, more volatile weather patterns and frequent high intensity storms.
- We have seen a significant increase in such volatile weather patterns which is impacting our aging infrastructure. For example, the drought of 2022 and the numerous severe storms that we've had in recent years have caused major damage to our assets (e.g. longer dry spells increase the risk of ground movement which causes underground pipes to move and burst; similarly, a severe storm damaged our service reservoir in Tynywaun resulting in a boil-water notice for 12k customers and an unplanned rebuild of the treatment works at a cost of over £10m. The drought this summer (2025) was due to the driest summer in 140 years, but our team were able to avoid any restrictions on water use, largely down to an incredible amount of work to maintain services, reduce leakage, and manage water resources effectively.
- In total, these unplanned and unexpected costs have required more than £100m additional investment in recent years. Such high unplanned expenditure is not adequately covered within price review settlements or contingency that can be created within our budget.
- As the Independent Water Commission's interim report concluded, *"Climate shocks, ageing assets, and rising demand mean the system faces growing pressure. Resilience must be treated not as a technical afterthought but as a strategic imperative. An infrastructure resilience and asset health framework is required to ensure that we do not just fix failures when they occur but rather responsibly plan for the long-term condition and performance of critical assets."*
- Whilst the Independent Water Commission make sound recommendations for future regulation, the Commission concluded that *"Ofwat's methodology for funding is backward looking, based on lagging maintenance expenditure and indicators of health and there are no consistent standards against which companies can assess the health of their assets."*
- Whilst there is hope for the future in terms of the reform of regulatory approach to managing and funding asset health and resilience, in the short term we will need to fund such additional unplanned costs from within existing budgets, and we therefore need to reduce our operating costs to increase the headroom within existing budgets to fund such work.

4. Punitive Penalty Regime:

- As noted by the Credit Ratings Agencies, the penalty regime for this investment period (2025-30 and known as AMP8) is placing further pressure on companies' finances with targets that are very challenging and carrying heavy penalties. Indeed, during the last AMP period, every company suffered penalties, and with a more punitive penalty regime this AMP, significant penalties across the sector are inevitable.
- Furthermore, increased propensity by regulators to prosecute water companies is resulting in a further reduction in funds available for investment.
- Both regulatory penalties and court fines result in a significant reduction in funds available to the company that could otherwise be used to improve services to customers or the environment. We are strong advocates of the polluter pays principle; however, we also believe that the current situation risks a "doom loop" where declining performance is exacerbated by increased penalties and fines. As a not-for-profit company, we have no other means of funding and no shareholders or equity partners to pay for such penalties.

- Penalties from regulators do not result in a financial payment as such, rather companies are unable to charge customers to the value of the penalty in future years. This reduces the amount of funds available for expenditure available to the company.
- Furthermore, any court fines that are paid are lost to Wales as they go to the Treasury. Our preference is for any “fines” that are demanded of companies take the form of “Environmental Enhancement Undertakings” whereby funding is paid by the guilty company towards environmental improvements in the area that has been impacted by the pollution and not lost to the Treasury.
- Ofwat’s Final Determinations for AMP8 increased potential penalties threefold. This has resulted in the potential for £250m penalties for Welsh Water during this five-year investment period compared to approximately £72m in the last AMP period (2020-2025).
- We cannot improve performance fast enough to avoid such penalties without significantly more investment and resource. Reducing our own operational expenditure through this transformation programme will allow us to focus the investment we do have on the areas that need it most.

5. Higher standards and costs of operating in Wales, but a small population to pay for it

- We are blessed to live and work in one of the most beautiful countries in Europe, which is also why Wales has so many environmental protections – proportionately more than other parts of the UK – which we must operate in and comply with.
 - Over 20% of land area in Wales is in a National Park.
 - 9 of the UK’s 16 Special Areas of Conservation (SAC) rivers are in Wales.
 - 15% of the UK coastline and 25% of its blue flag beaches are to be found here.
 - despite only having 8.5% of the UK land area, we have 15% of the UK’s Sites of Special Scientific Interest.
 - 44% of our rivers meet good ecological status, compared to only 14% in England, and 68% of our bathing waters meet “excellent” water quality standards (compared to 64% in England and 50% in Scotland)
- We all want to meet the standards that are set for and expected of us. But our finances – and our customers’ finances - can only stretch so far. Despite not having shareholders, with only 1.4m bill payers – including some of the most vulnerable and lowest income households and communities in the UK - the financial requirements to meet our increasing challenges is immense.
- Simply put, the cost of doing everything we all want to do as quickly as we’d like, is unaffordable for our customers. We must therefore prioritise collectively (government, regulators, companies and customers) to ensure what funding we do have is used where it will have the greatest impact and in line with customers’ priorities. With this in mind, we are fully supportive of the Independent Water Commission’s recommendations for a new national System Planner for Wales.

The challenge we therefore face is one of balancing performance that meets the standards that our customers want, that is financeable and at a cost that is affordable to customers.

The scale of the challenge

We need to reduce operational expenditure by approximately £50m per year from the current rate of approx. £400m. Whilst total revenue in 2024/25 was £920m, total expenditure – including all operating expenditure,

costs of financing the capital investment programme, taxation etc - was over £1bn. The detailed breakdown of our finances is published annually in our Annual Report and Accounts and our 6-month interim financial results will be published later in November.

The impact on customer bills, service and investment

Earlier this year, Ofwat confirmed the business plans for water companies in England and Wales for the five years to 2030. As noted at the time, average household customer bills will need to increase to pay for the significant investment needed to meet the various challenges facing the sector, especially relating to the environment.

For Welsh Water customers, this means that bills will increase by 42% over the 5-year period, and the average household water bill increased 27% this year, compared to an average increase across the sector of 26%. These bill increases do not however cover the additional costs we face that are outlined above.

We are very conscious that our customer base includes some of the most deprived and economically challenged communities in the UK. Balancing investment needs and performance improvements at a price that is affordable to our customers is therefore very much front of mind.

Historically, Welsh Water's bills have been amongst the highest in the sector – mainly due to the additional investment needed to fund wastewater treatment to improve coastal bathing waters following privatisation, which inland water companies didn't need to do. This was exacerbated for Welsh Water customers by having 15% of the UK's coastline compared to only 5% of the population.

However, over the past five years, the difference between Welsh Water's bills and the average across the sector has dropped from 13% above the sector average to 6% above average today. Similarly, we had the 2nd highest bill 5 years ago which has now dropped to joint 4th. Finally, over the last 5-year period, Welsh Water had the second lowest bill increase out of all water and sewage companies – at 38% compared to an average of 48% (the largest company increase was 87%). Our bills are now therefore far closer to the average for the sector than they were. In addition, we continue to provide one of the most generous social tariffs in the sector (which is part funded by our not-for-profit model) which is aimed at providing support for those customers who are struggling to make ends meet.

In terms of capital investment, our plan for 2025-30 (AMP8) is the most ambitious 5-year investment period since Glas Cymru was formed over 20 years ago. We will be investing over £4 billion in our services - almost double what we delivered in AMP7 (2020-25). This is a huge opportunity to make a meaningful difference for our customers, communities, and the environment.

Our transformation programme does not reduce this investment and indeed looks to make the delivery of such projects more efficient.

This investment is heavily regulated by Ofwat who have introduced strict requirements in terms of both the projects that are delivered and the operational performance targets it has set. Failure to deliver against these can result in financial penalties for both failure to deliver the investment projects and operational performance targets.

However, it should be noted that some customer and stakeholder expectations will not be met solely by our investment – this is most notable in terms of environmental targets. For example, whilst Welsh Government’s policy has been to reduce environmental harm from Combined Storm Overflows (CSOs), Ofwat’s final determination placed a significant financial penalty for failure to meet a target relating to the number of times a CSO spills - not the environmental impact it will have - to have a comparative measure with English companies. Whilst CSOs have been the focus of significant media, public and political scrutiny, in Wales, they are a small proportion of the reasons that waterbodies are not achieving good ecological status. According to NRW’s ‘Reasons for not Achieving Good’ data they are documented as impacting around 3% of total waterbodies and about 5% of those failing. Our own investigations into whether CSOs are having an ecological impact will however provide more information. The ecological status of Welsh rivers is considerably better than in England (44% of Welsh rivers meet good ecological status compared to 14% in England] and the % impact of the water sector is lower in Wales than in England. Over £1bn of our investment in 2025-30 will be directed to improve CSO operation, but this alone will do very little to improve the overall water quality in the river as it is such a comparatively small contributor. Arguably, greater environmental benefit could be gained by investing this money in other aspects of our operation (such as improvements to our Wastewater Treatment Works), but failure to meet Ofwat’s CSO spill target will incur significant financial penalties. In line with Ofwat’s Final Determination, failure to meet Welsh Government’s preferred environmental harm metric will not incur a financial penalty.

Furthermore, Ofwat’s penalty regime for CSO monitoring is based on the Environment Agencies methodological requirements not Natural Resources Wales (and Welsh Water’s monitoring capability was set and funded in line with NRW’s requirements). This could result in £23m of penalties over the AMP solely because of a methodological difference that Welsh Water was never funded to meet. We are faced with either a £5m+ bill to upgrade our monitors in line with the EA’s requirement or a £23m penalty from Ofwat for failure to meet their monitoring requirements. £10m of this penalty has already been incurred this year as no time was given for us to upgrade our monitors. Neither the penalty nor the upgrading of the monitors will drive environmental improvement.

Similarly, under Ofwat’s new Bathing Water measure, we are likely to incur a substantial penalty for a reduction in coastal bathing water quality over this summer despite none of our assets operating in the areas where water quality has deteriorated during the monitoring period. This penalty will reduce the investment that we have available for future years despite not being able to control the other sources of pollution (e.g. agricultural runoff) that impact water quality. Such blunt measures coupled with high financial penalties are a risk to perpetuating the “doom loop” – both reputationally and financially – that I referred to earlier.

In summary, the Transformation Programme aims to protect customer bills by making the company more efficient, maintain investment as originally planned and agreed with regulators, and drive service and performance improvements for customers and the environment. However, wider factors beyond our control, are placing additional pressures on our investment programme.

How will the Welsh Water workforce be impacted?

We currently employ approximately 4,000 people directly and a similar number through our contractors and suppliers who work on our behalf. The transformation programme has outlined plans to reduce the directly

employed workforce by approximately 500 over the next 18-24 months. However, with the doubling of our capital programme we're expecting to see the number of people employed in our supply chain rise substantially as these schemes move into construction.

The main focus of these reductions is on support and "back office" functions and management roles, and our aim is to limit impact on operational "front line" teams as much as possible. The first phase of our changes has focussed on teams such as finance, human resources, IT, procurement, administration, and our retail team. Future phases will look at other parts of the business, including senior management structures.

Since Glas Cymru acquired Welsh Water in 2001, we have had good and constructive relationship with our trade unions. This positive relationship has secured strong results for both our workforce and the company. We've successfully delivered successive "Working Together Agreements" with the Unions at the start of each investment period – giving the workforce assurance on annual pay awards for the five years of the AMP period and revising working patterns and practices in line with the company's changing needs and focus. We are hopeful that such agreement for this AMP is imminent, including a commitment to inflation-matching (CPI-H) annual pay awards for the remainder of the period (we are waiting the outcome of the trade union ballot on this proposal).

Our Union representatives have been briefed regularly since the start of the year including the challenges the credit-rating downgrade in particular has had on our financial position. We have continued our open discussion with the Trade Unions throughout this process and have supported them in holding their own "Roadshow" events to meet with members and employees across the business. These Roadshows began before the public announcement to reduce the size of the workforce, and we supported the Trade Unions in publicising these events through our internal communications channels. I have been a strong advocate of a positive working relationship with the unions throughout my time at Welsh Water and this is a view that is shared by colleagues on the Executive Team and my successor, Roch Cheroux. Both Roch and I have met with the unions since the public announcement of the redundancies.

We launched our Trawsnewid programme at the start of the year, and I've used every opportunity to keep our employees abreast of the challenges and changes we face, and have not shied away from the risk of redundancies. I hold a monthly virtual briefing session where anybody across the business can attend and ask any question. These sessions are usually attended by c1000 employees, and the latest meeting was attended by over 2,400. I have been asked on numerous occasions throughout this period about potential redundancies and have been open and honest in my responses that redundancies would be an inevitable necessity following the credit rating downgrade.

Since the announcement confirming our proposals to reduce our workforce, I have personally led 18 employee roadshows in all parts of our operating area from Caernarfon to Cardiff and Llysyfran in Pembrokeshire to Llandudno to discuss the transformation programme, as well as company performance and other issues. These sessions have been very well attended, and I was joined by members of the Executive Team and Roch Cheroux who will succeed me as CEO in January.

Wherever possible, we will prioritise voluntary exits, retraining, and redeployment, and we will work closely with our trade unions and provide full support to every colleague impacted. The consultation for those teams and individuals affected, is running for 90 days.

Following our announcement in September, we opened a voluntary enhanced redundancy application process that goes far above statutory requirements, capped at 52 weeks' pay for eligible applicants.

We are also providing career transition support for colleagues going through organisational change, which includes CV workshops, interview coaching, and help to identify external opportunities.

Customer engagement

We undertake regular customer research and our own data from customer contact is also used to provide important insight into our customers' views.

Our customer research looks at several key metrics including customer satisfaction and perception of value for money and customers' priorities. Whilst customer satisfaction has remained comparatively high, perception of value for money has dropped especially since bills increased earlier this year. In terms of customer priorities, the highest ranked priorities are reducing environmental impact and pollutions, and keeping bills affordable (reducing frequency of CSO discharges is ranked separately and lower than environmental impact). At the lower end of customers' priorities is improving customer service which is already scored amongst the best in the sector.

Our interpretation of such data is that customers expect us to keep their bills as low as possible, focus our investment on environmental improvements (as reflected in our business plan) and we therefore have a duty to be as efficient as possible and reduce our own costs where possible.

As mentioned above, the need to reduce our workforce is born of necessity – both in terms of financial stability but also in terms of delivering value for money for our customers. Whilst we are a not-for-profit company, we are not a charity; we do not receive Government funding for our core services nor can we access funding injections from equity investors. Our customers are our only source of revenue, and we must cut our cloth according to what they can afford.

Flintshire supply interruption – August 2025

We fully acknowledge and recognise the frustration felt in the local community because of this prolonged incident and reiterate our apology to those impacted. We understand how difficult it must have been for our customers to be without water for an extended period.

Dŵr Cymru's Gold Command is the company's emergency response to operational incidents at the highest level. This was in place from the outset to ensure that as a business, we were acting as swiftly as possible in response to the major incident. I oversaw the Gold response and was also present at our local Silver Centre in Kinmel Park during the incident.

On Saturday 9th August, following a burst on the 30" diameter Asbestos Cement main in Broughton that feeds north Flintshire from our Water Treatment Works in Bretton, our team excavated to locate the pipe which was 5 metres deep. This work had to be carried out within a trench box (a large scale temporary protective barrier to protect those working on the main) to gain safe access. The main was much deeper than

its original construction with ground level having been raised by 2-2.5 meters during the redevelopment of the area.

Our intention was to carry out a permanent repair, but due to the depth of the main, and the restricted working space due to the presence of several other utility services which also caused delays, we could only fit a collar as a temporary repair to restore water supplies as quickly as possible. If we had attempted at the time to extend the excavation to install a new section of pipe, this would have resulted in approximately 40,000 properties losing supply as our storage had severely depleted by then, due to the ongoing heatwave at the time.

This repair enabled us to refill the network with the aim of gaining enough water storage in our service reservoirs to go back and complete the permanent repair within a larger sheet piled excavation, without any impact on supplies. We were also mindful of the approaching heatwave and doing all we could to keep our system storage of treated water as high as possible to meet increased demand.

Unfortunately, the temporary repair didn't hold long enough for the system to fully replenish, as the water network is extensive and over 500km in length. This meant that we had to proceed with a further emergency repair, expediting the larger sheet piled excavation. The ground conditions were difficult as the main was close to electric cables which required extra care. We were also managing water resources across 3 service reservoirs which was a huge logistical challenge. We were able to maintain supplies in our service reservoir in Prenbrigog, which supplies 18,000 customers (which would have gone empty had we extended the time of the original repair).

Our teams worked tirelessly to carry out the repair safely and as soon as they could so that supplies could be restored. Other measures were also in place such as a fleet of tankers moving water around the network in the area to minimise disruption to as many customers as we could.

Alternative Water Supplies

During this incident, we operated three bottled water stations to cover the largest possible number of residents and deployed delivery teams for those on our Priority Services Register (PSR). Having reviewed and learnt lessons from the incident at Bryn Cowlyd earlier in the year the bottled water sites were opened, and deliveries of bottled water to our PSR customers commenced in advance of any supply interruptions. The sites were located at Jade Jones Pavilion in Flint, Park & Ride Car Park at Deeside Industrial Park and the County Hall Car Park in Mold. These locations were agreed following discussions with Flintshire County Council and based on the best traffic management options available in the affected areas while also allowing us to ensure that we kept customers safe. The measures ensured thousands of households had access to alternative supplies within hours of the outage.

Bottled water drops were made to community hubs, including Mostyn, Greenfield, Connah's Quay, Sealand, Garden City and Mancot. These were established by local Councillors who helped to distribute the water on our behalf to customers. A further satellite site was also set up at Talacre to aid customers affected in that area. During this incident:

- 1,738,000 litres of water / 932,328 bottles given to customers

- 880,000 litres were held in reserve at any one time to supplement water stations
- water tankers supplied 7 care homes and 1 hospital
- Around 200,000 litres of bottled water were provided to DCWW Priority Services Register customers and vulnerable sites
- Around 100,000 litres of bottled water delivered through the Logistics Cell to wider vulnerable people

Communications

We used multiple communication channels to deliver messages directly to our customers who were affected. These channels included social media, our website, direct text to landlines and mobiles, postal leaflet, media coverage and interviews. We sought to issue regular updates on our website homepage and social media which were updated 3 times every day with fresh content. I also contributed to a video for Facebook which had more than 166,000 impressions, whilst our website saw increased traffic during the incident with our specific incident webpage receiving 55,536 views and our 'In Your Area' service received 172,786 views during this period. We proactively kept local stakeholders informed as their local knowledge and extensive local influence helped leverage local word-of-mouth networks. We identified a total of around 80 stakeholders, and they were given a clear access point within the Communications Team to raise any issues, including out of hours. Towards the end of the incident our messaging included details of the timelines involving the refill of our network following the repair. We issued location-specific restoration updates to customer, that were based on the calculations of our engineers – this is the first time that we have presented this level of detailed information in this way.

Compensation

Eligible households have been paid £30 in compensation for every 12 hours their supplies have been affected. Business customers have received compensation of £75 for every 12 hours their supplies were affected. In addition, we have also agreed to make goodwill contributions for each business customer towards certain costs/loss of gross profit up to £2500.

The average annual household bill for the area supplied by Breton Water Treatment Works is around £470 for households and £783 for non-household customers.

Goodwill payments have also been paid to customers in Ffynnongroyw. There was an unusually high level of leakage in Ffynnongroyw during the incident, which we recognise may have had an impact on our network and its performance during this period of very low pressure. Household customers will receive a goodwill payment of £120 whilst business customers will receive £300.

Incident Review

Following any major incident, Welsh Water holds a full internal review that looks at all aspects of our incident response. A review is also held with our operational partners that took part in the Strategic Co-ordinating Group and Tactical Co-ordinating Group meetings during the incident. These reviews allow us to discuss our response in detail and identify lessons for future incidents and improvements in terms of our operational response.

We have held internal post incident reviews with the teams involved, and our representatives attended the multi-agency debrief held to review the incident. Work is currently underway to compile our Post Incident Review report, and we haven't yet received the multi-agency report.

I trust that the information above is helpful - however please do let me know if I can be of further assistance.

Yours sincerely

Peter Perry
Chief Executive, Dŵr Cymru Welsh Water

Rebecca Evans AS/MS
Cabinet Secretary for Economy, Energy and Planning
Ysgrifennydd y Cabinet dros yr Economi, Ynni a Chynllunio



Ein cyf/Our ref MA-RE-2541-25

Llywodraeth Cymru
Welsh Government

Llyr Gruffydd MS
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Mike Hedges MS
Chair of the Legislation, Justice and Constitution Committee
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17 October 2025

Dear Llyr and Mike,

Thank you for the Climate Change, Environment and Infrastructure Committee (CCEI) and the Legislation, Justice and Constitution Committee (LJCC) reports on the Legislative Consent Memorandums for the Planning and Infrastructure Bill. Both committees remain concerned about the process for NSIPs in Wales. The CCEI is concerned that the Welsh SIPs are not aligned with NSIP Bill provisions, and the LJCC is concerned about the practical effects on Welsh public bodies and the public. I wrote to you on 11 August and 5 September regarding the NSIP Bill provisions.

To confirm, both the SIP process and the NSIP Bill provisions have been designed to deliver timely decisions on large scale infrastructure projects. In order for both consenting regimes to operate efficiently, it is essential that when development proposals are submitted they can proceed to examination with the right information, informed by early engagement and consultation with stakeholders.

Whilst the SIP regime and the NSIP Bill provisions adopt different approaches to pre-application procedures, they are both underpinned by the need for applicants to undertake early, meaningful and proportionate engagement with relevant stakeholders in order to increase the likelihood of a smooth, efficient examination process. Relevant stakeholders will include Local Planning Authorities, bodies such as Natural Resources Wales, and the public. These stakeholders are currently engaged and will remain engaged with both systems.

The consultation paper on streamlining infrastructure planning, issued by the UK Government, emphasises the importance of pre-application engagement. The consultation states that the NSIP regime would function on the basis of a front-loaded approach in which development proposals are thoroughly scoped and refined prior to being submitted to the Planning Inspectorate. The consultation paper seeks views on whether guidance and other

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Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

documents would be useful in supporting applicants and stakeholders at pre-application stage.

Meaningful and constructive early engagement and consultation with stakeholders will be critical to enable applicants to produce quality development proposals that can proceed to examination. I note that the UK Government consultation is open until 27 October 2025. It provides an opportunity for interested parties to submit views on the pre-application proposals.

It is in this context that I am content to support this provision.

Yours sincerely,

A handwritten signature in black ink that reads "Rebecca Evans". The signature is written in a cursive, flowing style.

Rebecca Evans AS/MS

Cabinet Secretary for Economy, Energy and Planning
Ysgrifennydd y Cabinet dros yr Economi, Ynni a Chynllunio

Huw Irranca-Davies AS/MS
Y Dirprwy Brif Weinidog ac Ysgrifennydd y Cabinet
dros Newid Hinsawdd a Materion Gwledig
Deputy First Minister and Cabinet Secretary for
Climate Change and Rural Affairs

Llyr Gruffydd,
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21 October 2025

Dear Llyr,

Thank you for your letter of 4 September enclosing the Climate Change, Environment, and Infrastructure Committee's Report: *The response to recent storms*.

I am grateful to you and the Committee for your comprehensive report, and for your work with key stakeholders as well as those who have been impacted by previous storms.

I have considered the recommendations in your report and have set out my response to each of the recommendations in the attached paper. The Welsh Government's position has been categorised as accept, accept in principle, or reject in each case, accompanied by a rationale and any financial implications that reflect the government's policy position.

I wish to reiterate my thanks to the Committee for its valuable report and its ongoing support in this important policy area. I hope you find this response highlights the government's commitment to flood and coastal erosion risk management in Wales.

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We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

Yours sincerely,

A handwritten signature in black ink, consisting of several fluid, overlapping strokes that form a stylized representation of the name.

Huw Irranca-Davies AS/MS

Y Dirprwy Brif Weinidog ac Ysgrifennydd y Cabinet dros Newid Hinsawdd
a Materion Gwledig

Deputy First Minister and Cabinet Secretary for Climate Change and Rural Affairs



The Response to Recent Storms

Response to the CCEI Committee Report (September 2025)

21/10/2025

In September 2025, the Climate Change, Environment, and Infrastructure Committee submitted its report on the Welsh Government's Response to Recent Storms. The report includes 25 recommendations. This is the Welsh Government's response to those recommendations.

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Introduction

Managing the risks of flooding and coastal erosion is a high priority for this Government. This Senedd term, we have committed to fund additional flood protection for 45,000 homes. We have made our largest ever investment in flood risk management, with over £300 million committed to reduce risks for communities across Wales.

The winter season of 2024-25 again demonstrated that, faced with a changing climate, we will experience more frequent and severe floods, rising sea levels and faster rates of coastal erosion. We must be prepared for more extreme weather events on a more regular basis.

We know it is not possible to prevent all coastal erosion and flooding, but we are committed to reducing the consequences for and to increasing the resilience of communities across Wales.

Storms Bert and Darragh brought significant impacts in November and December last year. The rainfall from Storm Bert exceeded the February Storms of 2020 in some places, but thanks to the dedication of our Risk Management Authorities and first responders, fewer communities were impacted.

I thank the members of the Climate Change, Environment and Infrastructure Committee for their report on the Welsh Government's Response to Recent Storms. I have set out my response to the Report's individual recommendations below.

Response to the 25 recommendations

Recommendation 1

The Committee recommends that

The Cabinet Secretary must ensure that NRW has immediate and ongoing access to the latest flood forecasting technologies and systems. The Cabinet Secretary should ensure that a programme of funding is available for this purpose, and to ensure that Wales is able to influence research and development priorities. The Cabinet Secretary should also ensure that NRW is able to access and participate in ensemble forecasting trials.

Response: Accept

I recognise the vital importance of having access to the latest flood forecasting technologies. In aid of this, Welsh Government provided NRW with almost £6 million to launch their new Flood Warning Information Service for Wales in 2024. This business-critical capital investment project has enabled NRW to provide a service tailored to the needs of customers in Wales.

NRW work in close collaboration with the Met Office and Flood Forecasting Centre to enhance forecasting data, modelling and assessments. These help to inform preparations and communications before, during, and after developing flood events. NRW has also reviewed impact thresholds at all warning locations across Wales and updated at some to help improve timeliness and accuracy of warnings.

Financial implications: If further enhancements are required by NRW, costs would need to be submitted to Welsh Government for consideration. We are supportive of any proposal to improve flood forecasting techniques and systems but would need to understand the costs further.

Recommendation 2

The Committee recommends that

The Cabinet Secretary should ensure that a systematic approach is introduced for cross-agency lessons-learned exercises following storm events such as storms Bert and Darragh.

Response: Accept

In line with our commitments within the Wales Resilience Framework, we have been working with UK Resilience Academy to develop and implement a pan-Wales lessons management system.

The internal lessons management system enables us to identify lessons from exercises, incidents and inquiries and to put in place the appropriate processes that ensure the lessons are implemented.

Following the storms of 2024, the Deputy First Minister led a number of debrief sessions to ensure we were able to swiftly capture the lessons from the responses to support our

collective learning. Lessons identified during this process have helped shape our preparations for the 2025-26 winter season, including the NRW review to impact trigger thresholds, and the further planned enhancements to the JIGSO platform to provide emergency responders with higher quality and more accurate information on vulnerable people.

A continued supportive lessons management approach will help us to learn, adapt and ultimately enhance resilience at the pan-Wales level.

Financial implications: None

Recommendation 3

The Committee recommends that

The Cabinet Secretary should work with partners to ensure that the Common Warnings Framework is implemented, so that flood warning language is consistent and clearly understood by both the public and responder organisations.

Response: Accept

Welsh Government is working closely with NRW to ensure consistency and clarity in communication to the public in Wales. NRW are actively engaged in the Common Warnings Framework and are contributing to its delivery along with the EA, SEPA and Met Office.

Financial implications: None

Recommendation 4

The Committee recommends that

The Cabinet Secretary should work with NRW and relevant partners to increase public engagement with flood and weather warnings, with a particular focus on low-income and digitally excluded households.

Response: Accept

The Welsh Government will continue to work in partnership with statutory responders, including NRW, and the third sector to enhance community resilience to enable individuals, businesses and civil society to improve their ability to understand, prepare for and to respond to weather warnings. Work on the Common Warnings Framework will make warnings and communications more accessible to the public.

The UK Government has recently undertaken the UK Public Survey of Risk Perception, Resilience and Preparedness to help understand what people think about different types

of emergencies, and what steps they have taken to prepare for them. The Welsh Government is currently analysing the **headline findings from the survey** to help inform future public communications on preparing for emergencies.

Financial implications: No additional financial implications

Recommendation 5

The Committee recommends that

NRW should update the Committee on the promotion, reach, and impact of its weather warning service, including how success is being measured and what actions are being taken to improve sign-up rates and accessibility.

Response: Accept

NRW provide the Flood Warning Information Services for Wales, and will provide an update to the Committee on this accordingly.

Financial implications: None

Recommendations 6 & 7

The Committee recommends that

The Cabinet Secretary should ensure that the Flood Response Framework is reviewed and updated to reflect the learnings from flooding events that have taken place since 2016.

And

The Flood Response Framework should define roles and responsibilities, including those in leadership roles, across all levels of government and responder agencies, to improve understanding and accountability.

Response: Accept

The Welsh Government has been undertaking a review of pan-Wales resilience governance structures and published the Wales Resilience Framework in May this year. In the associated Delivery Plan, Welsh Government committed to ensuring guidance is available for first responders, where appropriate, and that it is subject to regular review.

In line with this, an updated Flood Response Framework will be published in Spring 2026.

Financial implications: None

Recommendation 8

The Committee recommends that

The Cabinet Secretary should provide an update on the additional funding provided to LRFs to support multi-agency coordination.

Response: Accept

During 2024-25, Welsh Government provided funding to Local Resilience Forums (LRFs) for the first time. Each of the four LRFs in Wales received £30,000 to support emergency planning and preparedness work, with funds being used to support a range of training and exercising activities.

Building on the success of the 2024-25 funding award, LRFs in Wales will each receive £50,000 during 2025-26. Funding will complement the contributions of partners and will support LRFs to continue to enhance their strategic coordination capacity and capabilities.

We have made commitments within the Wales Resilience Framework to introduce an annual statement to the Senedd on civil contingencies risks and resilience. This will include information on the current risk picture, our resilience performance, our current state of preparedness and how funding to Local Resilience Forums has been utilised.

Financial implications: No additional financial implications

Recommendation 9

The Committee recommends that

The Flood Response Framework should set out clear escalation protocols for Tactical and Strategic Coordination Groups.

Response: Accept

Each Local Resilience Forum has well-rehearsed escalation protocols for Tactical and Strategic Co-ordination Groups which are aligned to the Joint Emergency Services Interoperability Principles (JESIP).

These protocols sit within a wider multi-agency management structure for the effective coordination of their joint response and includes the level of response activation, activity and escalation. This information already features in the Flood Response Framework, and officials will consider during its refresh how it can complement other guidance and protocols already in place.

Financial implications: None

Recommendation 10

The Committee recommends that

The Cabinet Secretary should clarify the use and effectiveness of the JIGSO project, including whether it could serve as a reliable alternative to, or complement, the existing PSR systems. The Cabinet Secretary should set out how he will improve awareness of the tool among emergency responders.

Response: Accept

The Welsh Government has developed a cutting-edge data application, “JIGSO”, to provide information to emergency responders on the ground. The application, which is part of DataMapWales, provides mapping including the addresses of those who have joined a Priority Services Register (PSR), which will include vulnerable individuals. This system has already helped responders to take action to ensure the safety of vulnerable people when emergency plans have been activated.

JIGSO adds value to the PSR by combining it with other data such as active flood alerts to help target any potential emergency response.

The PSR data in JIGSO comes directly from utility companies and is updated regularly. Work is underway to bring in PSR data from more utility companies to enhance what is available in JIGSO currently.

JIGSO is designed to complement existing responder arrangements and with the dedicated resources recently allocated to support JIGSO we are working to enhance the service and raise awareness with emergency responders.

Financial implications: None

Recommendation 11

The Committee recommends that

The Cabinet Secretary should ensure that LRFs develop formal, standardised agreements with third-sector organisations, ensuring these partners can be mobilised quickly and effectively during emergencies.

Response: Accept

We have made commitments within the Wales Resilience Framework Delivery Plan to support greater consistency of approaches across Local Resilience Forum structures and activities in Wales. It includes specific actions including working in partnership with statutory responders and the voluntary and third sectors to enhance community resilience to enable individuals, businesses and civil society to improve their resilience.

Each Local Resilience Forum in Wales already includes relevant subgroups that manage relationships with local third sector organisations. How these organisations are mobilised during emergencies is for LRFs to determine based on local needs.

NRW and its LRF partners work with a number of third sector organisations in helping to promote flood resilience. They regularly attend community flood volunteer network

events, as they form a crucial part in supporting community response to - and recovery from - flooding.

Financial implications: None

Recommendations 12 & 13

The Committee recommends that

There should be a stronger recognition of the role of community groups. The Cabinet Secretary should work alongside NRW to explore opportunities to provide sustainable funding for community resilience groups.

And

The Cabinet Secretary should update the Committee on steps being taken by the Welsh Government or NRW to embed community participation in flood resilience planning processes, including through citizen forums and co-designed local plans.

Response: Accept

The Welsh Government expects Risk Management Authorities (RMAs) to work collaboratively with communities when developing Flood Risk Management schemes and plans. This approach is set out within our National Strategy for Flood and Coastal Erosion Risk Management (FCERM) and our associated business case guidance.

The business case guidance is used in the development of all new FCERM schemes in Wales. The principles and ways of working of the Well-being of Future Generations Act are embedded through the guidance, which encourages collaborative ways of working throughout the development process.

However, we acknowledge that there is always room for improvement and communities should feel seen and heard. We recognise the role that the Welsh Government must play in embedding community participation in flood risk management in Wales.

Within the streamlined national civil contingencies governance structures, the role of the Wales Resilience Forum has been strengthened to ensure it is able to provide the necessary strategic leadership and challenge to our partners across the responder community and the voluntary and third sector for the enhancement of risk management and preparedness across Wales.

Membership of the Wales Resilience Forum and the Wales Resilience Partnership have been revised to include representatives from voluntary and third sector. This reflects the key role of the voluntary and third sector in resilience activity across Wales and provides direct links into resilience activity at the strategic and coordination tiers.

I am also delighted to confirm that additional revenue funding has been made available to support the National Flood Forum in Wales. Welsh Government will be working with the National Flood Forum to explore how their services can be implemented on a wider basis across the nation. The National Flood Forum can aid communities in drafting flood plans, as well as offering wider advice and support, and I understand that communities already in receipt of this support have found it to be incredibly valuable.

Financial implications: No additional financial implications

Recommendation 14

The Committee recommends that

The Cabinet Secretary should review the adequacy of current emergency funding provided by the Welsh Government for households affected by flooding, to ensure that funding support better reflects the costs arising from severe weather events.

Response: Reject

The Emergency Financial Assistance Scheme is a flexible revenue scheme designed to respond to specific events which can have very different impacts in different areas and can be Wales-wide or localised. The specific support for individual households is intended to offer initial assistance with immediate costs and is not a replacement for insurance. It is a discretionary part of the scheme which Ministers have considered over recent years when whole communities are significantly affected, and community resilience and support reduced.

Financial implications: N/A

Recommendation 15

The Committee recommends that

The Cabinet Secretary should introduce grant funding to enable individual homes and businesses to put in place preventative resilience measures, such as floodgates.

Response: Reject

Property Flood Resilience (PFR) measures are eligible under the capital Programme and through the Small Scale Works Grant to local authorities. The Welsh Government encourages all RMA's to consider PFR measures, including as an interim measure, where they are considered an appropriate option for reducing flood risk.

RMA's determine the appropriateness of the use of PFR and may submit an application for funding, as they are best placed to ensure a cohesive review of the community at risk of flooding.

Welsh Government have funded a number of these schemes throughout Wales, such as the £1.7 million made available to local authorities for PFR following the Storms of February 2020. This included projects in Rhondda Cynon Taf, Caerphilly, Monmouthshire and Powys, which are estimated to have benefitted up to 594 homes.

Welsh Government and our RMA's will always work with local communities to identify the best combination of measures that address the specific threats in each locality.

Financial implications: N/A

Recommendation 16

The Committee recommends that

The Cabinet Secretary should report back to the Committee on how, in his view, existing insurance schemes such as Flood Re, can be better promoted to residents of high-risk flood areas in Wales.

Response: Accept

The Welsh Government is actively working with wider partners to encourage RMAs and the insurance industry to engage with communities and individuals to raise awareness of flood insurance.

We recognise that homeowners need to understand their coverage, as standard home insurance policies often do not include flood damage. We are promoting clearer communication about the Flood Re scheme, which helps make flood insurance more affordable for properties at high risk of flooding.

The Welsh Government also supports the Flood Re 'Build Back Better' initiative and is promoting greater awareness of how participating insurers can offer up to £10,000 towards property flood resilience measures when repairing homes after a flood.

NRW amplifies these messages via signposting on its website, which includes information about 'Build Back Better', and through its hard copy booklets. These are distributed via community leads, partners such as local authorities, town and community councils, and charities, as well as being requested directly from NRW by the public.

Financial implications: None

Recommendation 17

The Committee recommends that

The Cabinet Secretary should take steps to ensure that mental health support is integrated into local flood response and recovery strategies.

Response: Accept in principle

We recognise the significant negative impact that flooding can have on people's mental health. People whose mental health has been impacted by flooding are able to access a wide range of support for their mental health, without the need for a formal referral.

The CALL helpline (0800 132 737) provides 24/7 emotional support and information about mental health and related matters to anyone in Wales. Every health board has a dedicated page detailing mental health support available in the local area - this includes easy-to-access support and online cognitive behaviour therapy services which do not need a GP referral.

The NHS 111 press 2 service is available for anyone experiencing an urgent mental health need – it ensures people in urgent need of support can be placed in direct contact with a mental health professional when they need it most. If children and young people have been affected, they can access support from the schools counselling service in their area.

People who are experiencing mild to moderate, or stable, severe and enduring mental health problems may be referred to their local primary care mental health support service by their GP.

NRW's website and hard copy advice also signposts to mental health support (Mind, CALL, Meic, PHW, Samaritans), and it ensures organisations offering these services are invited to the flood community volunteer network events that NRW facilitates.

Financial implications: None

Recommendation 18

The Committee recommends that

The Welsh Government should ensure that national guidance on riparian responsibilities, including for culverts and ditches, is updated and promoted. The guidance should be supported by mapping tools, a register of owners, and compliance assistance for landowners.

Response: Accept in principle

RMAs only have permissive powers relating to the management of flooding. They do not have powers to intervene when river erosion occurs, which is the responsibility of the riparian landowner.

The principals of riparian ownership have been established in common law for over 200 years, but recent discussions around flood risk management in the Senedd suggests that many landowners are unaware of the concept.

Natural Resources Wales (NRW) has produced **guidance** which explains to landowners how riparian ownership works, and how it might affect them. It also maintains up to date guidance on the NRW website at **Natural Resources Wales / Responsibility for rivers, streams, culverts, and canals**. I strongly encourage Members to share these resources with constituents so that riparian landowners are fully informed of their role in managing flood risk. This will help to improve our collective resilience to flooding by ensuring that our watercourses and their associated assets are maintained to the best possible condition.

Financial implications: None

Recommendation 19

The Committee recommends that

The Cabinet Secretary should review the Emergency Financial Assistance Scheme (EFAS) to ensure that the thresholds of the scheme reflect the financial capacity of local authorities responding to repeated severe weather events.

Response: Accept

The current thresholds are 0.2% of general revenue expenditure in any one year, therefore are increased every year in line with overall projected expenditure. It is expected that Local Authorities have reserves to deal with unexpected events, which includes severe weather events. The use of the EFAS scheme should be considered alongside the preventative funding available for severe weather events, primarily through flooding prevention grants. The potential impacts of climate change are well recognised, and local authorities are developing adaptation plans to identify risks and mitigations over the medium term. This work is being supported by Welsh Government funding to the WLGA.

Financial implications: The financial implication if the threshold was changed would depend on the change to the thresholds, upwards or downwards, and the type and size of event within any given year.

Recommendation 20

The Committee recommends that

The Cabinet Secretary should consider whether a 10-year strategy, such as the National Strategy for Flood and Coastal Erosion, is sufficient to ensure improved long-term planning and investment.

Response: Accept

The current National Strategy for Flood and Coastal Erosion Risk Management is set out under the terms of the Flood and Water Management Act 2010. The measures the Strategy contains are designed to be deliverable over the decade from 2020, but it was drafted with an inherent longer-term view due to the threat of climate change and its impact on flood and coastal erosion risk.

Welsh Government will continue this strategic approach when drafting the third National Strategy for Flood and Coastal Erosion. It will align with other relevant plans such as those for shoreline management, infrastructure and planning, and will draw together our responses to recent reports from sector representatives, to give a clear long-term plan for flood and coastal erosion risk management in Wales.

Financial implications: None

Recommendations 21 & 22

The Committee recommends that

The Cabinet Secretary should provide an update on the implementation of the recommendations of the Section 19 review, led by Elwen Evans KC.

And

The Cabinet Secretary should review the Section 19 flood investigation process to ensure it better supports local resilience planning.

Response: Accept

In August 2023, the independent review of the local government Section 19 and Natural Resources Wales reports into extreme flooding in winter 2020 was published, followed by an Oral Statement in September 2023. This was a Programme for Government commitment that has been completed.

The Flood and Coastal Erosion Committee (FCEC) have established a Section 19 working group and are working with Welsh Local Government Association and Local Authority partners to consider the review findings. The subgroup is carrying out a consultation this Autumn to identify high level requirements to develop supporting guidance for Section 19 flood investigation reports, with the aim of drafting a standard template that will simplify the investigation process and be more accessible to the public.

Financial implications: None

Recommendation 23

The Committee recommends that

The Cabinet Secretary should provide an update on the development of the catchment planning roadmap, including timelines and stakeholder involvement.

Response: Accept

The Welsh Government recognises the importance of integrated catchment planning as a key tool in building resilience to flooding and coastal erosion, particularly in light of the increasing frequency and severity of storm events such as Storms Bert and Darragh.

As committed to in our response to NICW's report, *Building Resilience to Flooding in Wales by 2050*, work on a roadmap to catchment planning is progressing, with the aim to provide a strategic framework for managing flood risk and water resources at a catchment scale. Officials will involve stakeholders as the policy development progresses.

Financial implications: None

Recommendation 24

The Committee recommends that

Given their potential impact, the Cabinet Secretary should prioritise scaling-up nature-based solutions, and make sure there are appropriate levels of funding available for that purpose. Farmers and landowners should be provided with support to understand their responsibilities and the opportunities in this policy area.

Response: Accept

The Welsh Government is committed to embedding catchment-based approaches within broader land use planning frameworks to ensure a holistic and sustainable response to flood and coastal erosion risk.

This approach will help ensure that land use decisions contribute positively to flood resilience, water quality, biodiversity, and community wellbeing.

The Welsh Government actively promotes Natural Flood Management and supports RMAs to work in collaboration with landowners and farmers to pursue nature-based solutions to reduce flood risk and to protect and enhance our natural environment.

To further strengthen Natural Flood Management, we have made £2 million available to support projects across Wales in 2025-26, aimed at enhancing the natural environment and reducing flood risks to properties.

Officials are also working collaboratively with partners to ensure that farmers are supported to understand natural flood management opportunities on their land through the Sustainable Farming Scheme, and incentivised to take those positive actions.

Financial implications: No additional financial implications

Recommendation 25

The Committee recommends that

The Cabinet Secretary should provide an update on the steps being taken to expand the use of nature-based solutions, including details of how these are being embedded into policy frameworks and reassurance that these schemes will continue to be funded beyond 2025-26.

Response: Accept

The Welsh Government is committed to ensuring that nature-based solutions are effectively considered to deliver long-term resilience to flooding and coastal erosion.

The Natural Flood Management (NFM) Fund is a key mechanism for resourcing nature-based solutions. The fund supports projects that reduce flood risk while delivering wider environmental benefits such as biodiversity enhancement, carbon sequestration, and

improved water quality. The Expression of Interest window for the 2026-7 NFM Fund is currently open.

The FCERM business case guidance, released in 2018, encourages NFM approaches where appropriate as part of the options appraisal process when RMAs apply for flood and coastal erosion risk management scheme funding. The guidance also ensures that appraisals capture evidence of the wider benefits associated with a given scheme, such as amenity, regeneration, community and biodiversity benefits.

Financial implications: No additional financial implications

Llyr Huws Gruffydd MS
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21st October 2025

Annwyl Llyr,

CCEI Committee Report: The Response to Recent Storms

Thank you for your letter of 4 September 2025, inviting comment from Natural Resources Wales (NRW) on your committee's report on the response to the 2024/25 storms and floods. We are grateful for your committee's focus on this matter, and for the opportunity to provide evidence as part of this important work.

Overall, we very much welcome the inquiry and the report. We are acutely aware that flooding is a significant issue in Wales, that causes not only physical damage to communities, infrastructure and the environment, but which all too often also brings lasting and significant real human impacts, including to health, social and economic hardships.

NRW, alongside other organisations, undertakes extensive flood risk management work that brings significant benefits to many communities at risk but it is clear that the impacts of climate change will mean that we experience more extreme weather events and flooding in the future.

There is no single solution to this complex issue, and it is therefore appropriate and welcome that your report contains a wide range of recommendations for stakeholders (including public sector organisations, private bodies, the voluntary sector and community-based organisations) to tackle the issues identified.

As you will appreciate, NRW will be steered by Welsh Government's response to the recommendations. We are engaging with Welsh Government officials on how the recommendations, and specifically those that relate directly to NRW, are considered, and where appropriate, taken forward.

We have reviewed the recommendations and where NRW is directly named, we have provided a short response below. However, we have a strong interest in many of the other recommendations, including those on the Common Warnings Framework, lessons learnt processes, emergency planning, and the use of catchment approaches and nature-based solutions.

Therefore, should you or members of your committee wish for us to do so, we would be happy to provide a further response on any of the recommendations. We will, of course, as

resources and priorities allow, work with Welsh Government and other partners on all relevant recommendations that are accepted by the Cabinet Secretary.

Thank you once again for your committee's work in this vital area. This report highlights the need for sustained effort and investment in flood preparedness and response. We recognise the key role that NRW has to play and remain committed to continuing to deliver meaningful outcomes that make a difference to lives and livelihoods in this sector, working within the budgets, resource base and partnership opportunities at our disposal.

Should you require any further information or clarification on our responses below, we would be pleased to provide it.

Yn gywir,

Ceri Davies

Prif Weithredwr Dros-Dro
Interim Chief Executive Officer

NRW's Response to 'The Response to Recent Storms' Report

Recommendation 1

The Cabinet Secretary must ensure that NRW has immediate and ongoing access to the latest flood forecasting technologies and systems. The Cabinet Secretary should ensure that a programme of funding is available for this purpose, and to ensure that Wales is able to influence research and development priorities. The Cabinet Secretary should also ensure that NRW is able to access and participate in ensemble forecasting trials.

NRW welcomes this recommendation. We look forward to working with the Cabinet Secretary and Welsh Government to take this recommendation forward. Good forecasting of complex weather events and their hydrological impact is a vital part of the armoury of flood response. The climate is changing, and computing capabilities are advancing, and the whole infrastructure (data, systems and human components) needs to also advance and respond. NRW has a close working relationship with the Met Office and the Flood Forecasting Centre, and we are engaged in initiatives to identify flood forecasting improvements and how these are taken forward. We will continue to engage with Welsh Government officials on priorities and investment needs.

Recommendation 4

The Cabinet Secretary should work with NRW and relevant partners to increase public engagement with flood and weather warnings, with a particular focus on low-income and digitally excluded households.

NRW welcomes this recommendation. NRW does a lot of work to promote understanding of flood warning messages. We focus mainly on the central provision of information and tools through our website, which is available for householders, communities and partners to utilise. We agree there is a need to improve levels of awareness of weather and flood warnings, what they mean, and the actions that communities and householders need to take when warnings are issued. This needs to be a whole-sector effort, for all partners, and not just NRW alone. For example, weather warnings are issued by the Met Office, and we need to work in collaboration with them to ensure their weather warning and NRW's flood warnings align. Also, NRW has prioritised central provision of resources, because this is where best value is added, and also because we do not have the resource base to do much direct engagement – but other organisations can play a role here. We agree that there needs to be a particular focus on low-income and digitally excluded households and recognise for example that web-based resources will not be accessible to all.

Recommendation 5

NRW should update the Committee on the promotion, reach, and impact of its weather warning service, including how success is being measured and what actions are being taken to improve sign-up rates and accessibility.

We would be grateful if you could confirm if the reference to NRW and weather warnings in this recommendation is correct and intentional, or if it is an error. Weather warnings are the responsibility of the Met Office, and not NRW. If you confirm that the intention is that an update is provided by NRW on the *flood* warning service, we will be happy to provide. We will assume this is in the format of a one-off written submission to you as Chair of the Committee but would welcome guidance from you if your requirements are different to that.

Recommendation 12

There should be a stronger recognition of the role of community groups. The Cabinet Secretary should work alongside NRW to explore opportunities to provide sustainable funding for community resilience groups.

NRW welcomes this recommendation. We already engage with third sector organisations such as the National Flood Forum, British Red Cross and the WCVA. We have also built up a network of over 65 community flood volunteer leads across Wales to provide them with support and advice. We also engage with public sector organisations such as Local Authorities and WLGA to explore how we can reach communities, including work we are doing with Rhondda Cynon Taf to consider what more we can do in collaboration. However, a step change in the number of such groups across Wales is likely to require significant effort and contribution from others who have more local community connections, including local authorities, town and community councils, and third sector organisations.

Recommendation 13

The Cabinet Secretary should update the Committee on steps being taken by the Welsh Government or NRW to embed community participation in flood resilience planning processes, including through citizen forums and co-designed local plans.

We welcome this recommendation. We will work with Government and other agencies to support this recommendation work by providing information on flood risk, flood resilience and our knowledge and networks of partners who can also help in this space. It will require cross-organisation partnership working.

Huw Irranca-Davies AS/MS
Y Dirprwy Brif Weinidog ac Ysgrifennydd y Cabinet
dros Newid Hinsawdd a Materion Gwledig
Deputy First Minister and Cabinet Secretary for
Climate Change and Rural Affairs

Agenda Item 3.3

Llywodraeth Cymru
Welsh Government

Ein cyf/Our ref: MA HIDCC 1855 25

Llŷr Gruffydd MS
Chair
Climate Change, Environment, and Infrastructure Committee
Senedd Cymru
Cardiff Bay
Cardiff
CF99 1SN
SeneddClimate@senedd.wales

20 October 2025

Dear Llŷr,

I am writing to inform the Committee of my intention to consent to the UK Government making and laying the Producer Responsibility Obligations (Packaging and Packaging Waste) (Amendment) Regulations 2025 (“the Regulations”).

The Regulations intersect with devolved policy and will apply to Wales. The Regulations will be made by the Secretary of State for Environment, Food and Rural Affairs under the following provisions of the Environment Act 2021:

- sections 50(1), 51(1) and 143(1),
- paragraphs 1-5, 7 and 12-19 of Schedule 4,
- paragraphs 1-9 and 11-17 of Schedule 5.

Sections 50(3) and 51(3) of the Environment Act 2021 provide that such Regulations can be made by the Secretary of State in relation to Wales with the consent of the Welsh Ministers. The Regulations apply in relation to England, Scotland, Northern Ireland and Wales and a similar request for consent has been sent to Scottish Ministers and Northern Ireland Assembly Members.

The Regulations amend the Producer Responsibility Obligations (Packaging and Packaging Waste) Regulations 2024 which introduced an Extended Producer Responsibility (EPR) scheme for packaging and packaging waste on a UK basis from 1 January 2025. The packaging EPR scheme seeks to ensure that the efficient costs incurred by local authorities

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Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

in managing packaging waste is met by the producers who use and supply packaging, applying the “polluter pays” principle.

Whilst it is normally the policy of the Welsh Government to legislate for Wales in matters of devolved competence, in certain circumstances there are benefits in legislating collaboratively with the UK Government where there is a clear rationale for doing so. In this instance it will enable a single UK-wide SI to make provision for the UK-wide scheme as has been consulted upon, thereby ensuring consistency of approach across the UK. Further, the Regulations make amendments to an already existing UK-wide SI. It is therefore appropriate that these Regulations are made on a UK-wide basis.

It is anticipated that the Regulations will be laid before the UK Parliament using the affirmative procedure and are expected to come into force in January 2026.

I have also written to Mike Hedges, Chair of the Legislation, Justice and Constitution Committee.

Yours sincerely,

A handwritten signature in cursive script, appearing to read 'Huw', with a horizontal line underneath it.

Huw Irranca-Davies AS/MS

Y Dirprwy Brif Weinidog ac Ysgrifennydd y Cabinet dros Newid Hinsawdd
a Materion Gwledig

Deputy First Minister and Cabinet Secretary for Climate Change and Rural Affairs

Llyr Gruffydd MS
Welsh Parliament
Cardiff Bay
Cardiff
CF99 1SN

28 October 2025

Dear Mr Gruffydd,

As Chair of the Climate Change, Environment, and Infrastructure Committee, the Office for National Statistics (ONS) and Government Statistical Service (GSS) would welcome your contribution to two consultations launched today.

The ONS has launched the Census 2031 topic consultation, asking for your views about the topics you think should be included in the next census. For more than two centuries, a decennial census has provided information about the population and housing, helping to inform decisions about public services and to better understand the economy, public health and inequality. While the core topics of age, education and jobs have remained the same over time, other topics such as armed forces veterans have been added based on the needs of users. This 14-week consultation will provide evidence to inform what topics will be included in the next census of England and Wales in 2031.

The GSS has also launched a consultation asking for your views on additional response options for ethnicity data. The GSS would like to understand your needs for data on additional ethnic groups, with the goal of making the harmonised ethnicity standard more inclusive.

Responses submitted over the 14-week period will feed into a new standard for ethnicity data collection, which will be recommended for use by collectors of ethnicity data across the GSS, including teams working on future censuses.

We would welcome your contributions to these consultations before they close on 4 February 2026. You can respond to the consultation in Welsh or English.

Both consultations are live on the [ONS consultations web page](#).

Yours sincerely,



**Emma Rourke, Acting National Statistician & Darren Tierney, Permanent
Secretary, Office for National Statistics**



Welsh Government Response to the UK-EU implementation review of the Trade and Cooperation Agreement

I would like to thank all four committees for the work they have undertaken to produce these recommendations.

The European Union is our closest and largest trading partner, and the Trade and Cooperation Agreement (TCA) governs the relationship between the UK and the EU.

However, the agreement is not a like-for-like replacement for the market access that the UK had as an EU member, and it has created barriers for Welsh businesses.

The Welsh Government has always advocated for a closer association with the EU. The announcement of a Common Understanding between the UK and EU in May 2025 provides opportunities to open negotiations, reset the relationship between the UK and the EU and reduce barriers for Welsh businesses.

Both these negotiations, and the TCA review, are upcoming negotiations and what can be set out and discussed publicly is necessarily limited due to sensitivities around international negotiations.

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Responses to the Culture, Communications, Welsh Language, Sport, and International Relations Committee Recommendations

Recommendation 1.

The Welsh Government should continue to regularly review and update its EU priorities, closely monitoring developments for their potential impact on Wales.

Response: Accept

The Welsh Government actively updates and reviews its priorities as negotiations develop and circumstances change. We will continue to review and update EU priorities and consider any potential impact on Wales as part of this ongoing work.

Financial Implications: None

Recommendation 2.

The Welsh Government should work to strengthen its relationships with EU institutions in order to advance Welsh interests and gain deeper insight into the EU's position and develop a dedicated EU Strategy.

Response: Accept in Principle

The Welsh Government already has active relationships with many EU institutions, and we will continue to strengthen these as our work progresses. These relationships have developed through the work undertaken by our Brussels office and our dedicated Representative for Europe as part of the delivery remit for our International Strategy, which includes our relationship with Europe and the EU. The focus and foundation of any developments of the relationship with the EU should be around recreating a relationship that works for both sides and this is already happening. As the current International Strategy draws to a close, and we move into a new phase of Wales' relationship with the EU, consideration will be given to whether a dedicated EU Strategy is required as part of our wider work on our approach to international relations.

Financial Implications: None

Recommendation 3.

The Welsh Government should, in its response to this report, confirm whether it is:

- actively pursuing full participation rights at UK-EU meetings where it has observer status.
- requesting to attend UK-EU meetings that fall outside the TCA institutional framework.

Response: Accept

The Welsh Government can confirm that it is not actively pursuing full participation rights at UK-EU meetings where it has observer status. The EU does not allow devolved governments to have participation rights. This is comparable to individual EU Member States also having observer status. However, we can confirm that we continue to engage with the UK Government on the committees that fall within the TCA institutional framework, to ensure that our interests are represented at these meetings. The Welsh Government will request attendance at any relevant UK-EU meetings that fall outside of the TCA institutional framework, where we believe this is appropriate.

Financial Implications: None

Recommendation 4.

The Welsh Government should update its review priorities to reflect its stated position, outlined by the Cabinet Secretary in response to the Culture shock report, of fully supporting the PPA's recommendation for a comprehensive solution for touring artists, covering both the movement of people and goods.

Response: Accept

Our International Delivery Plan 2025 reaffirmed our commitment to European engagement and the priority that the Welsh Government places on working with the UK Government on its ambitions to reset the UK-EU relationship. We continue to use all available levers to encourage the UK Government and the EU to ease the difficulties faced by creative sector workers. At the UK-EU relations Inter-Ministerial Group (IMG) meeting on 23 September 2025, the Cabinet Secretary for Economy, Energy and Planning raised the issue of touring artists and the importance of coming to a solution for them.

We welcome the recent re-set in relations between the UK and the EU and the announcement of the UK-EU Common Understanding Agreement. We

particularly welcome the announcement made by the UK and EU governments at the summit on 19 May to establish a mutual commitment to negotiating a youth experience scheme. We believe such a scheme could potentially benefit young artists, as it is generally younger, less-established artists who face the greatest challenges when touring with increased costs, time limits, and bureaucracy resulting from EU exit.

Financial Implications: None

Recommendation 5.

The Welsh Government should make representations to the UK and the EU to ensure that the issue of touring artists remains a priority. This should include calling for the UK and EU to articulate plans for improvements.

Response 5: Accept

The Welsh Government are using all available levers to encourage the UK Government and the EU to ease the difficulties being faced by creative sector workers, particularly touring artists. This includes actively engaging with the UK Government and the EU, to ensure that the interests of Welsh creative workers are represented and advanced. We recognise that further discussions are needed about supporting touring artists and we will continue to raise this matter with the UK Government. At the UK-EU relations Inter-Ministerial Group meeting on 23 September 2025, the Cabinet Secretary for Economy, Energy and Planning raised the issue of touring artists and the importance of coming to a solution for them.

Financial Implications: None

Recommendation 6.

The Welsh Government should provide a comprehensive list of EU programmes that it would like to participate in and indicate the extent to which there is agreement between the four UK governments on participation.

Response: Accept

The written Statement¹ published by the Cabinet Secretary for Economy, Energy and Planning following the EU summit in May, set out our ambition for Wales to participate in a broader range of EU programmes, including Erasmus+ as well as accessing other EU programmes such as Creative Europe and European Territorial Cooperation.

¹ [Written Statement: EU- UK Summit \(19 May 2025\) | GOV.WALES](#)

Financial Implications: None

Recommendation 7.

The Welsh Government should share its understanding of why UK association to additional EU programmes, including Creative Europe, was not agreed in Common Understanding, and whether association to other programmes is still being pursued by the UK Government.

Response: Accept

Access to additional EU programmes such as Erasmus+ and Creative Europe is a priority that we regularly emphasised with the UK Government ahead of the May summit. The Welsh Government is pleased that the UK and EU agreed to work towards association of the Erasmus+ programme and are working intensively with the UK Government to ensure that Welsh interests are represented in these negotiations and the other areas of cooperation agreed as part of the Common Understanding.

We cannot comment on the negotiations that took place between the UK and EU ahead of the May Summit. We note and welcome the commitments in the Summit Joint Political Statement for regular meetings to consider joint strategic interests and ensure opportunities for future cooperation are maximised. In this context, we will continue to press the UK Government to include access to additional EU programmes, such as Creative Europe, as a priority for future EU-UK discussions.

Financial Implications: None

Recommendation 8.

The Welsh Government should clarify whether changes to the TCA are required to facilitate UK participation in additional EU programmes.

Response: Accept

The written evidence refers to the implementation review of the TCA, the text relating to the review is standard text commonly used by the EU in its trade agreements. Reviews conducted under these agreements have not led to significant changes to the respective agreements in the past.

The Common Understanding Agreement, agreed in May 2025, is a framework agreement which set out areas where the UK and the EU are seeking closer cooperation. The negotiations for this work are currently underway and are separate to the review of the TCA. As negotiations are currently active, we

cannot comment on what may be included in any finalised agreement and if this finalised agreement may lead to amendments to the TCA.

Financial Implications: None

Recommendation 9.

The Welsh Government should confirm whether it has calculated the cost of participation in Erasmus+ and Creative Europe using the formula set out in the TCA, or whether it has been part of joint UK-wide exercise to do so.

Response: Accept

The decision to rejoin EU programmes such as Erasmus+ and Creative Europe is a reserved matter for the UK Government. The Welsh Government has not undertaken its own cost calculations for rejoining these programmes, nor has it participated in any UK-wide exercise to do so.

However, the UK Government has committed—through the Common Understanding with the EU—to work towards rejoining Erasmus+, and Welsh Government officials have been actively collaborating with the Department for Education (DfE) on this effort.

Additionally, the Welsh Government has clearly communicated to the UK Government its desire to participate in a broader range of EU programmes, including Creative Europe.

Financial Implications: None

Responses to the Economy, Trade, and Rural Affairs Committee Recommendations

Recommendation 10.

The Welsh Government should produce a perspectives document on the Trade and Cooperation Agreement in line with its approach to other international trade agreements as a matter of urgency.

Response: Reject

The Welsh Government published '*The new relationship with the EU: What it means for Wales*' in 2021². The 'perspective' documents have been published for newly signed trade agreements to provide an overview of potential impacts on Wales. The TCA has been in operation for several years and analysis on its impacts is already available. It should also be noted that the potential outcomes of any new arrangements with the EU as part of upcoming negotiations will render any immediate report out of date almost immediately. Should new arrangements be agreed with the EU, we will publish our views on these at that time.

Financial Implications: None

Recommendation 11.

The Welsh Government should report to the committees on the extent to which the Welsh and UK Governments' implementation review priorities align on trade and what the implications are for Wales. Where the UK and Welsh governments' priorities do not align, the Welsh Government should outline how it is going to support the affected sectors.

Response: Reject

I published a Written Statement responding to announcements made at the UK-EU Summit in May, including where the announcements represented the Welsh Government's high-level priorities, for example on seeking an SPS Agreement, cooperation on energy, alignment of Emission Trading Schemes, Youth Mobility and Erasmus+. However, our more detailed priorities on these areas form part of ongoing discussions between the UK and the EU and we cannot comment on upcoming negotiations. The Welsh Government meets regularly with the UK Government and continues to set out its priorities.

Financial Implications: None

² [The new relationship with the EU: What it means for Wales | GOV.WALES](#)

Recommendation 12.

The Welsh Government should continue to call on the UK and EU to prioritise practical steps to address trade friction and should provide this Committee with quarterly updates on progress in the areas listed in this chapter.

Response: Accept

The Welsh Government has always called on the UK and the EU to improve its trading relationship. The EU is our most important trading partner and any steps to reduce trade frictions are welcome. Updates are provided during the Cabinet Secretary's regular appearances before the Committees.

Financial Implications: None

Recommendation 13.

The Committee expects the Welsh Government to raise at intergovernmental meetings, practical steps to address trade barriers. It should provide detailed reports to this Committee on progress in its written statements and meeting notifications.

Response: Accept in principle

Intergovernmental meetings are forums for discussing the active trade negotiations. We follow the process of informing committees when meetings will take place and what is discussed. Whilst we are limited in including sensitive information, this includes the key points discussed at the meetings.

The various committees established under the Trade and Cooperation Agreement are often a better forum to discuss existing trade barriers and the Welsh Government makes representations to these committees on trade barriers. Minutes of committees are published by the UK and the EU accordingly.

Financial Implications: None

Recommendation 14.

The Welsh Government should ensure its business support for sectors are tailored to reflect the impacts the different treatment of goods and services are having on companies and sectors.

Response: Accept in Principle

The Welsh Government accepts that support needs to be updated and specific; however, the review of the TCA, which is due to take place in 2026, and the active negotiations for the common understanding which are currently underway are both variables which may influence how the treatment of goods and services will be considered, therefore it is prudent to actively monitor these negotiations and tailor support and guidance when information becomes available.

Financial Implications: None

Recommendation 15.

The Welsh Government should confirm if Common Understanding could require renegotiation of non-EU trade agreements.

Response: Accept

As the negotiation of elements of the Common Understanding, such as a potential SPS agreement, are not yet completed, it is impossible for us to say whether any final agreements will require re-negotiation of non-EU trade deals.

Financial Implications: None

Recommendation 16.

The Welsh Government should set out how it will ensure that Wales's unique position in post-Brexit trade flows is taken into account in discussions with the UK Government on a UK-EU SPS agreement.

Response: Accept

The Welsh Government recognises the strategic importance of the SPS agreement and is committed to ensuring that Wales's distinct trade profile, and devolved responsibilities, are fully reflected in ongoing discussions with the UK Government. We continue to support the UK Government's position in seeking an SPS agreement with the EU.

The Welsh Government will continue its active engagement with UK Government departments to ensure Welsh priorities are embedded in SPS negotiations. This includes continuing the frequent official level engagement we already have in place

and ensuring that Ministerial engagement takes place in a way that reflects the pace of any negotiations.

Financial Implications: None

Recommendation 17.

The Welsh Government should ascertain its role in the early consultation mechanism with the EU as part of an SPS agreement and inform the committees as soon as possible.

Response: Accept in Principle

The Welsh Government's role in the early consultation mechanism is a subject for negotiation in the forthcoming UK-EU Common Understanding negotiations and we are unable to comment on live negotiations; we will inform the committee of such a role as soon as possible.

Financial Implications: None

Recommendation 18.

The Welsh Government should keep the implications of an SPS agreement on border control posts under review and provide the Committee with an update in its response to this report and on a quarterly basis thereafter.

Response: Accept in Principle

The Deputy First Minister and Cabinet Secretary for Climate Change and Rural Affairs set out the Welsh Government's position on Border Control Posts (BCPs) in Wales and this statement (highlighted under paragraph 154) remains the current position. The decision to pause the implementation of the Border Target Operating Model (BTOM) arrangements was made by the UK Government which has indicated that this will remain subject to review. Working with colleagues in the UK and Scottish governments, the Welsh Government will keep the implications of an SPS agreement on border control posts under review. We will update the Committee as appropriate but, while negotiations are still live, a quarterly review would not be appropriate.

Financial Implications: None

Recommendation 19.

In line with recommendations 12 and 13 of this chapter, the Welsh Government should provide the Committee with regular updates on the progress of UK-EU discussions, and discussions with the UK Government on the provision of services and the subsequent implications for Wales.

Response: Accept

The Welsh Government will, within the limits of what is possible to report during live negotiations, update the committee on the progress of UK-EU discussions during the Cabinet Secretary's regular appearances before the committee.

Financial Implications: None

Recommendation 20.

In its response to this report the Welsh Government should set out:

- why further improvements to MRAs on conformity assessments were not pursued in Common Understanding;
- confirm if this issue is still being pursued with the EU; and
- if it will form part of the implementation review.

Response: Accept

Currently the EU does not believe that there is reciprocal value in negotiating a Mutual Recognition Agreement (MRA) on conformity assessment with the UK and, as such, it was not included as part of the Common Understanding. The Welsh Government will continue to pursue both the UK and the EU in the value of a MRA to be included in future UK-EU Summit announcements.

Financial Implications: None

Recommendation 21.

The Welsh Government should provide an update and analysis of the historic and potential future effects of this issue on the shellfish farming sector and Welsh trade.

Response: Accept:

Due to lack of granular trade data for Wales, it is not currently possible to determine the value of trade in shellfish between Wales and the EU. However, published HMRC data shows, in the year ending June 2025 there was £9.3m worth of seafood exports (of which shellfish is a part of) from Wales to the EU. This is considerably lower than the £23.5m exported the year ending June 2015.

Statistics on Welsh aquaculture production from 2012 to 2023 are currently being developed as part of the UK Data Collection Framework. As these are Official Statistics in development we are unable to share until they are published. When the data is available Welsh Government will provide the committee with an analysis as requested.

Financial Implications: None

Recommendation 22.

In its discussions with UK Government on its priorities for the implementation review, the Welsh Government should emphasise the importance of addressing issues related to rules of origin.

Response: Accept

The Welsh Government has regular dialogues with the UK Government on rules of origin issues. We believe that the UK should seek to open negotiations to join the Pan European Mediterranean (PEM) Convention and have made this view clear to the UK Government.

Financial Implications: None

Recommendation 23.

In line with recommendations 12 and 13 of this chapter, the Welsh Government should provide the Committee with regular updates on progress relating to rules of origin.

Response: Reject

We are unable to provide detailed regular updates due to industry sensitivities and/or impact on live negotiations. We can continue to provide high-level updates.

Financial Implications: None

Recommendation 24.

In its response to this report, the Welsh Government should set out what its priorities are for addressing animal welfare issues through both the implementation review and the UK-EU reset and set out how it will balance the benefits of both alignment and divergence in this area.

Response: Accept

Welsh Government has always made clear that we will seek the inclusion of firm commitments within trade agreements to help improve animal welfare standards. This remains the case for both the implementation review and the negotiations for the UK-EU reset. We are working closely with the UK Government and other Devolved Governments to ensure that they are aware of our priority to maintain and enhance our high standards and ambitions for animal health and welfare and biosecurity in all UK Government Free Trade Agreement (FTA) negotiations. The UK and the EU both share commitments to improving Animal Welfare standards. We are proud of the high standards we have in Wales, including for animal health and welfare, traceability, and food safety.

Financial Implications: None

Recommendation 25.

In line with recommendations 12 and 13 of this chapter the Welsh Government should provide regular updates to the committees on this matter, including on the animal welfare dimensions of an SPS agreement.

Response: Accept in Principle

The Welsh Government will not be able to provide detailed updates on live negotiations but will comment on the provisions included in the final agreement.

Financial Implications: None

Recommendation 26.

The Welsh Government should explore with the other UK governments the development of a UK-wide mechanism to monitor alignment and divergence with the EU.

Response: Accept

The Welsh Government will explore with the UK Government, Scottish Government and Northern Ireland Executive, including through the Inter-Ministerial Group on UK-EU Relations, the potential to develop a UK-wide mechanism to monitor alignment with, and divergence from, the EU.

Financial Implications: None

Recommendation 27.

The Welsh Government should:

- set out how it feeds in Welsh assessments of alignment and divergence into UK intergovernmental discussions;
- clarify what discussions take place currently on alignment and divergence within the Welsh Government and its Trade Policy Advisory Group; and
- set out how it works with other stakeholders to seek their input on the effects of alignment and divergence.

Response: Accept

The Welsh Government meets frequently with the UK Government, Scottish Government and Northern Ireland Executive, including through the Inter-Ministerial Group on UK-EU Relations and the IMG EFRA to discuss a range of topics. This including discussions on alignment and divergence, where it is relevant to upcoming EU negotiations. In addition, the Welsh Government works with stakeholders through the Trade Policy Advisory Group to discuss alignment and divergence and its view on

EU reset work more broadly. We also engage with specific industry bodies when specific discussions on issues are needed.

Financial Implications: None

Responses to the Climate Change, Environment, and Infrastructure Committee Recommendations

Recommendation 28.

The Welsh Government should set out its position on whether the TCA meets the environment-related tests outlined in its 2024 approach to trade policy document.

Response: Accept

The Welsh Government's Approach to Trade Policy does not set out formal "environment-related tests." Instead, it outlines a series of policy expectations that trade agreements should meet to support Wales's environmental objectives and legal duties under the Well-being of Future Generations Act.

The expectation is for environmental provisions to be a key part of any trade agreement and that there should be no impact on our ability to meet our existing commitments both domestically or internationally or prevent us from making ambitious commitments in the future. This reflects the importance that the Welsh Government places on the environment, both in terms of addressing climate change and ensuring high levels of environmental protection.

The TCA generally aligns with these expectations, with shared commitments to non-regression, high levels of environmental protection and seeking to improve upon these standards. The environmental scope of the TCA is broad, including detailed provisions related to climate action and nature and biodiversity conservation, which are key Welsh Government priorities, in addition to several other areas related to environmental protection.

Financial Implications: None

Recommendation 29.

The Welsh Government should clarify whether it supports enhanced or additional UK-EU cooperation and/or agreements beyond the current provisions in the TCA.

Response: Accept

We accept and welcome the importance of enhanced cooperation in the areas identified under the common understanding, whilst recognising that the TCA does not replace the cooperation framework that existed across EU members prior to EU exit. However, the existing TCA does provide several routes for the exchange of views, for sharing information on areas of environmental policy and to identify areas of mutual interest and topics which would benefit from further discussion. For example, at the Level Playing Field -Trade Specialised Committee, the UK and the EU are able

to discuss core policy areas where further discussion may be beneficial. Welsh Government officials engage with counterparts on relevant agenda items.

Financial Implications: None

Recommendation 30.

The Welsh Government should clarify the Cabinet Secretary's comments, that closer alignment with the EU could lead to "a potential reduction in some of our standards or values around the environment", including examples of where this may be a concern.

Response: Accept

Whilst closer alignment may realise potential benefits, these need to be assessed on a case-by-case basis depending on the specific details of what that alignment might look like, to ensure any changes would support Wales's policy goals. Whilst there are a very small number of environmental regulations in scope of the common understanding, such as around the Emission Trading Schemes (ETS) provisions, the majority are out of scope. The EU and the Welsh Government both have high ambitions for environmental protection and, importantly, the TCA allows the UK and Devolved Governments to develop and implement policies appropriate for our domestic circumstances, including improving on existing levels of protection. However, the Welsh Government does not, and cannot know, what legislation the EU may introduce in the future. Thus, a situation could exist in the future where the EU could introduce legislation that runs counter to some of our environmental standards and values.

Financial Implications: None

Recommendation 31.

The Welsh Government should publish and share its views on the list of sectors that will be covered as a minimum by a future UK-EU ETS linking agreement, as set out in Common Understanding,

Response: Reject

ETS linkage is a subject for negotiation in the forthcoming UK-EU Common Understanding negotiations, and we are unable to comment in detail on upcoming live negotiations. However, the only sectors that can be covered by a linking agreement are those currently within the UK ETS and the EU ETS.

Financial Implications: None

Recommendation 32.

The Welsh Government should finalise a clear position on ETS linkage as a matter of priority.

Response: Accept in Principle

ETS linkage is subject to negotiation in the forthcoming UK-EU Common Understanding negotiations. There are potential benefits in linking which come with being part of a larger market. However, our view on ETS linkage will be informed by those negotiations, and we are unable to comment on live negotiations.

Financial Implications: None

Recommendation 33.

The Welsh Government should provide its view on the environmental and climate implications of the ETS linkage and CBAM exemptions envisaged by Common Understanding.

Response: Accept in Principle

The Welsh Government will take a view on the environmental and climate implications of ETS linkage and Carbon Border Adjustment Mechanism (CBAM) exemptions, once the forthcoming UK-EU Common Understanding negotiations have progressed. We will provide these views once negotiations have been completed.

Financial Implications: None

Recommendation 34.

The Welsh Government should explain how it is promoting the importance of UK-EU cooperation on energy infrastructure in Wales-adjacent seas, including in the Irish and Celtic seas.

Response: Accept

The Welsh Government is actively engaged on the energy portfolio between Wales and Ireland. The Welsh Government's Ireland team is an active member and participant in the UK-Ireland MoU meetings, supporting our energy policy officials on active projects.

The Welsh Government's team in Ireland works directly with Irish Government officials in the departments of Foreign Affairs, Transport and Energy on joint opportunities and

this has ensured that the Ireland-Wales 2030 Shared Statement³, which the First Minister signed in July 2025, had a key theme of collaborative working on energy.

The Welsh Government is also working with Celtic Sea developers on active projects to explore ways in which the Welsh ports and supply chain can maximise the benefits on offshore energy projects in the Celtic Sea. The Welsh Government are also working the Irish Maritime Area Regulatory Authority and undertaking collaborative working with Welsh counterparts. The Welsh Government is also active in exploratory discussions with the UK Government on possible UK access to the single EU electricity market as part of the Common Understanding between the European Commission and the United Kingdom.

Financial Implications: None

Recommendation 35.

The Welsh Government should confirm whether the mechanisms being considered for the resumption of shellfish trade include the UK's dynamic alignment to EU rules on water quality.

Response: Accept

The Welsh Government will monitor ongoing negotiations but will be unable to report on these until the final agreement is reached.

Financial Implications: None

³ [Ireland-Wales shared statement 2030 \[HTML\]](#) | GOV.WALES

Responses to the Legislation, Justice and Constitution Committee Recommendations

Recommendation 36.

The Welsh Government should provide information on discussions between the UK and the EU and between the UK's governments with the aim of reducing complexity arising from current arrangements.

Response: Accept in Principle

While discussions between the UK and the EU are sensitive, and not something the Welsh Government would be able to provide information on without the consent of both the UK and the EU. The Welsh Government does write to the committee to highlight discussions and minutes of IMG meetings. TCA committee meetings are published online.

Financial Implications: None

Recommendation 37.

The Welsh Government should set out the steps it is taking to simplify its own advice and guidance in respect of current UK-EU arrangements

Response: Accept in Principle

The Welsh Government is regularly reviewing its advice and guidance and, with the negotiations ongoing for the common understanding, this may amend the current trading arrangements. The Welsh Government will develop guidance when these negotiations have concluded.

Financial Implications: None

Recommendation 38.

The Welsh Government should develop its own guide to UK-EU arrangements, similar to that produced around the time of the UK's exit from the EU.

Response: Accept

As the review of the TCA is due to take place in 2026 and with negotiations ongoing for the common understanding, both of which may amend the current trading arrangements, the Welsh Government will develop guidance when negotiations for both have concluded.

Financial Implications: None

Recommendation 39.

The Welsh Government should call on the UK Government to outline its specific priorities for the implementation review and the scope of the review as a matter of urgency.

Response: Accept in Principle

The Welsh Government has regular discussions with the UK Government on the upcoming review, including where its priorities lie. The UK Government has currently not publicly outlined its specific positions for upcoming negotiations.

Financial Implications: None

Recommendation 40.

The Welsh Government should keep its priorities under review, monitor developments to understand their implications for Wales, and should notify the four committees if or when changes are made.

Response: Accept in Principle

As set out in recommendation 1, the Welsh Government will continue to review and update EU priorities and consider any potential impact on Wales as part of this ongoing work. Whilst we will notify the committee should changes be made to our high-level priorities, such as seeking an SPS Agreement, we will be unable to notify the committees of detailed negotiation positions during the negotiation period.

Financial Implications: None

Recommendation 41.

As we have previously recommended, the Welsh Government should make representations to the UK Government for the Inter-Ministerial Group on UK-EU Relations to take place sufficiently in advance of Trade and Cooperation Agreement meetings and UK-EU negotiations.

Response: Agree

The Welsh Government has made representations to the UK Government for IMG to take place in advance of negotiations.

Financial Implications: None

Recommendation 42.

The Welsh Government should call for the terms of reference of the Inter-Ministerial Group on UK-EU relations to be updated to take into account arrangements emanating from the reset, such as Common Understanding and the implementation review. This will make sure they remain fit for purpose for the next phase of UK-EU relations.

Response: Accept

The Welsh Government will ask for the terms of reference to be updated.

Financial Implications: None

Recommendation 43.

As we have previously recommended, the Welsh Government should call for a new memorandum of understanding on UK-EU relations to be agreed between the UK Government and the devolved governments.

Response: Accept in Principle

The Welsh Government is working with the UK and the other Devolved Governments on updating some of the four nations agreements that are currently in place. These discussions may be a route by which to explore cooperation around the UK and Devolved Governments' relationship with the EU.

Financial Implications: None

Recommendation 44.

The Welsh Government should ascertain how it will be involved in the early stage consultation mechanisms described in Common Understanding and should encourage the UK Government to reach an agreed position with the devolved governments.

Response: Accept in Principle

The role of the Welsh Government in early consultation mechanisms is a subject for negotiation in the forthcoming UK-EU Common Understanding negotiations and we are unable to comment on live negotiations. We will inform the committee of such a role as soon as possible.

Financial Implications: None

Recommendation 45.

The Welsh Government, in its response to this report, should provide an updated view on the compliance of border control arrangements with World Trade Organisation rules.

Response: Accept

World Trade Organisation (WTO) rules are applicable in situations where trading partners do not have a full scale free-trade agreement in place. As the UK and EU have a trade agreement in place, in the form of the Trade and Cooperation Agreement, preferential treatment on goods between the UK and the EU is permitted.

Financial Implications: None

Recommendation 46.

The Welsh Government should provide its view, in its response to this report, on whether the arrangements to be negotiated as part of Common Understanding could raise compliance issues with Wales's existing international obligations, including non-EU trade agreements.

Response: Accept

We are currently unable to comment on compliance of what may be included in the final arrangements that are part of the Common Understanding, as these have not yet been negotiated. However, we can be clear that the Welsh Government takes its international obligations seriously and would immediately raise with the UK Government if it thought that an arrangement being negotiated would lead to non-compliance. Once a final negotiated position has been reached, the Welsh Government will be able to set out its perspectives on any agreed position.

Financial Implications: None

Recommendation 47.

Welsh Government should provide its assessment of the operation of the European Union (Future Relationship) Act 2020, and of its implications for the devolution settlement, in the context of concerns raised with Senedd committees. This should include specific commentary on section 29.

Response: Reject

The Welsh Government's positions on the implementation of post-EU legislation has been stated on numerous occasions. The UK Government has committed to not normally legislate in areas of devolved competence without our consent and never without consultation. The Welsh Government will continue to monitor the operation

of the Act and section 29 but does not consider a specific assessment to be required at this time.

Financial Implications: None

Recommendation 48.

The Welsh Government should provide an update on discussions with the UK Government on the provision of financial support for UK Domestic Advisory Group participants.

Response: Accept

This issue has been discussed directly with the UK Government and it has confirmed that no funding is available and that all UK Domestic Advisory Group (UK DAG) meetings have a hybrid option for attending.

Financial Implications: None

Recommendation 49.

The Welsh Government should set out how it engaged with the UK Government's 2024 review of the membership of the UK DAG, and should explain the steps it took to raise awareness amongst Welsh organisations of the UK Government's expressions of interest campaign.

Response: Accept

The standard process we follow when membership of groups such as the UK DAG are being recruited for, or reviewed, is to use our existing networks, such as our Trade Policy Advisory Group, to raise awareness of these opportunities. However, in the specific case of the 2024 DAG review we do not have a record of whether this process was followed.

Financial Implications: None

Recommendation 50.

The Welsh Government should clarify the link, if any, between the Welsh Government's Trade Policy Advisory Group and the TCA's civil society forums.

Response: Accept

There is no formal link between the Trade Policy Advisory Group (TPAG) and the TCA's Civil Society Forum (CSF). The Trade Policy Advisory Group was set up provide the Welsh Government with advice on matters relating to Trade Policy, with its remit increasingly focusing on the EU Trade in 2024. Membership of both TPAG and the CSF is broad, including business bodies and a range of other organisations. Although,

some members of TPAG may also attend CSFs, there is no deliberate effort to ensure that CSF attendees are also TPAG members.

Financial Implications: None

Recommendation 51.

The Welsh Government should clarify how it monitors and engages with the work of the UK Domestic Advisory Group and the Civil Society Forum.

Response: Accept

While it is the responsibility of the UK Government to monitor the work the UK Domestic Advisory Group (DAG), some members of the Welsh Government's Trade Policy Advisory Group (TPAG) are also members of the UK DAG and as such we are able to hear their views directly. We also actively engage with other DAG members such as APBI, BSI, SMMT and UKAS⁴ to understand their views on key matters and identify opportunities to collaborate.

Financial Implications: None

Recommendation 52.

The Welsh Government should confirm if the governments of the UK are developing a central mechanism to monitor changes to EU law for the purposes of monitoring alignment and divergence.

Response: Accept

The Welsh Government will explore with the UK Government, Scottish Government and Northern Ireland Executive, including through the Inter-Ministerial Group on UK-EU Relations, the potential to develop a UK-wide mechanism to monitor alignment with, and divergence from, the EU.

Financial Implications: None

Recommendation 53.

The Welsh Government should set out how it has ascertained whether alignment and divergence has occurred between the UK and the EU, and between Wales and the EU, since the UK's exit from the EU.

Response: Accept in principle

This work is already underway in the areas that are currently being negotiated.

⁴ APBI - Association of the British Pharmaceutical Industry, BSI - British Standards Institution, SMMT - Society of Motor Manufacturers and Traders, UKAS - United Kingdom Accreditation Service

Financial Implications: None

Recommendation 54.

The Welsh Government should seek clarity on how EU law will apply in the UK if it is to dynamically align to the EU. It should ensure this process respects the role of the devolved governments and legislatures.

Response: Accept

We are currently engaging with the UK Government on how it intends to take forward legislation to implement any future agreements with the EU, including on the role that devolved legislatures will need to take to implement agreements in devolved areas. We have been clear that any legislative process must respect the devolution settlement and existing processes in the devolved governments.

Financial Implications: None

Recommendation 55.

The Welsh Government should clarify what role common frameworks will play in decision-making about UK alignment to the EU.

Response: Accept

Common Frameworks are an important mechanism for discussion and cooperation between the four governments in policy areas previously governed by EU law. They provide a forum to share evidence and explore the impacts of regulatory alignment and divergence, helping governments to make informed decisions on EU alignment. Each government retains the right to decide on EU alignment within its own competence. Frameworks help ensure those decisions are transparent and can support coordinated approaches where appropriate, while respecting each government's ability to diverge.

Financial Implications: None

Agenda Item 3.6

Rebecca Evans MS
Cabinet Secretary for Economy, Energy and Planning
Ysgrifennydd y Cabinet dros yr Economi, Ynni a Chynllunio



Llywodraeth Cymru
Welsh Government

Eich cyf/Your ref
Ein cyf/Our ref

Llyr Gruffydd MS
Chair
Climate Change, Environment and Infrastructure Committee

SeneddClimate@senedd.wales

31 October 2025

Dear Llyr,

You wrote to the Cabinet Secretary for Transport and North Wales on 19 May about the "Proposed subsidy support for Cardiff Airport". I was asked to respond as Cabinet Secretary with portfolio responsibility for the Airport.

I would like to offer my sincere apologies for the very considerable delay in responding to your letter. As you will be aware, I place great importance in ensuring that correspondence with Senedd Committees is dealt with as promptly as possible. However, for this particular issue it has proven challenging to respond to your questions over the preceding months. The delay is a consequence of the unique circumstances in which the Welsh Government finds itself in relation to Bristol Airport's legal challenge against our long term investment package for Cardiff Airport. The evolution of this legal action has presented an ever-moving challenge for officials in terms of balancing my desire for the fullest possible transparency against what can be said safely on the public record in a manner that does not compromise the Welsh Government's legal position.

I offer below a more detailed explanation of the legal challenge timeline, which I hope will offer some insight into the complexity of the process that we have faced and continue to face as a Government. However, to ensure we have captured lessons from this process, I have asked my officials to consider how they can better enable Welsh Ministers to respond to Committee questions and keep Committees informed as best as is possible in circumstances where the Welsh Government is engaged in sensitive legal proceedings. In hindsight, it would have been preferable to respond to your letter much earlier, even if that response were very limited and disappointing to Committee Members in terms of our ability to answer your questions fully.

Canolfan Cyswllt Cyntaf / First Point of Contact Centre:
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Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

At the time your letter was sent, the Welsh Ministers were engaged in a formal, statutory pre-litigation process, as we were anticipating a legal challenge from potentially one or more parties against our £205.2m, ten-year investment package for Cardiff Airport. At that stage, it was not clear to us what we could safely say in response to your letter, so we adopted a precautionary approach.

My response to your letter was further delayed because on 25 June, the Welsh Ministers received a copy of a Notice of Appeal from the CAT, filed by Bristol Airport. This confirmed that Bristol Airport is legally challenging our decision to award a subsidy package to Cardiff International Airport Limited ('the Subsidy').

The CAT published a [summary of Bristol Airport's](#) appeal on 22 July. The nature and scope of the appeal may yet change, because Bristol Airport have permission to apply to the CAT to amend the Notice of Appeal. We are still waiting to see if Bristol Airport choose to do so. If their case is amended, the CAT is likely to publish an updated summary in due course.

The CAT has confirmed this week that the appeal will be heard on 9-10 February 2026. It is not known when the CAT's judgement will be provided, but it may be a number of weeks (or even months) after the hearing. The judgement will not necessarily conclude the matter, as a route of appeal exists.

In the circumstances, and until such time as the legal proceedings are concluded, it would, unfortunately, not be appropriate for me to respond to the questions raised in your letter. This accords with the substance of the Senedd's guidance on preparing written evidence. However, I offer you my commitment that, should the CAT provide a judgement before the pre-election window begins, I will write to you to provide an update on all of the questions in your May letter and to provide a view on the Government's response to the CAT outcome.

Whilst the ongoing legal action means that I cannot discuss the Airport's investment package, I am able to offer the Committee some updates on the Airport's performance over the summer, which I hope you will view as informative and positive.

Between September 2024 and September 2025 the airport served 928,000 passengers, which represents a 5.3% increase on the previous year. Flights from the Airport were busier with more seats filled on services. Ryanair had its largest ever Cardiff flight programme in Summer 2025 and Vueling has increased service frequency between Wales & Spain. The Airport now serves 38 direct routes year-round, with TUI operating over 30 routes. TUI has confirmed plans to base a fourth aircraft at the Airport, launching new routes to Faro and Hurgada, along with Fuerteventura, which is being extended into Summer 2026 after launching this winter season. KLM continues to connect Wales to 150 global destinations via Amsterdam. The new Next Generation Security scanners, which were funded by the Welsh Government, work well and have improved the passenger experience.

In terms of wider economic developments, European Cargo has a base at Cardiff Airport and Swissport has been appointed as a new cargo handling partner, investing in upgraded facilities and equipment. In addition, the Airport is investing in a new solar farm to provide more sustainable power for its operations by April 2026. Officials from the Airport and Visit Wales attended the 'Routes World' event in Hong Kong in September promoting Wales and the Airport on the world stage.

Yours sincerely,

Rebecca Evans.

Rebecca Evans AS/MS

Cabinet Secretary for Economy, Energy and Planning

Ysgrifennydd y Cabinet dros yr Economi, Ynni a Chynllunio

Huw Irranca-Davies AS/MS
Y Dirprwy Brif Weinidog ac Ysgrifennydd y Cabinet dros Newid
Hinsawdd a Materion Gwledig
Deputy First Minister and Cabinet Secretary for Climate Change
and Rural Affairs



Llywodraeth Cymru
Welsh Government

Ein cyf/Our ref: MA/HIDCC/2508/25

Llŷr Gruffydd MS
Chair
Climate Change, Environment, and Infrastructure Committee
Welsh Parliament
Cardiff Bay CF99 1SN

30 October 2025

Dear Llŷr,

I wish to inform the Committee of the intention to consent to the application to Wales of The United Kingdom Internal Market Act 2020 (Exclusions from Market Access Principles: Glue Traps) Regulations 2025. The Regulations will be made by the Secretary of State and will extend to England and Wales, Northern Ireland, and Scotland. The Regulations are subject to the affirmative procedure and would come into force 21 days after the date on which they are made.

On 3 October 2025, I received a letter from Baroness Hayman of Ullock, Parliamentary Under Secretary of State, requesting consent to the Regulations. The Regulations are being made under The United Kingdom Internal Market Act 2020 (UKIMA) and will exclude the sale of glue traps from the market access principles within that Act. This means that the market access principles will not apply to, nor affect the operation of, any legislation so far as it prohibits the sale of glue traps in any part of the United Kingdom.

The UK Government has reversed the decision made by the previous UK Government and now supports the exclusion following the Scottish Government's indication it intends to ban the supply of glue traps in Scotland (in addition to use). Defra has now agreed to this as it is recognised it will result in minimal economic impact. In accordance with UKIMA, the UK Minister for Animal Welfare and Biosecurity, has approached the three devolved governments of the UK for consent.

The Regulations do not currently impact upon our policies or operations in Wales. As no evidence has been put forward after two years suggesting the ban on the use of glue traps is insufficient, I do not have any plans at this time to expand the ban in Wales to include sale. Should evidence be presented however that necessitates extending the ban to include sale, with the exclusion in place, there would be no barriers stemming from UKIMA. Given the potential benefit for Wales, I am content on this occasion to provide consent for the regulations to be made in the UK Parliament.

I have written similarly to the Chair of the Legislation, Justice and Constitution Committee.

Yours sincerely,

Huw Irranca Davies AS/MS

Y Dirprwy Brif Weinidog ac Ysgrifennydd y Cabinet dros Newid Hinsawdd a Materion Gwledig Deputy First
Minister and Cabinet Secretary for Climate Change and Rural Affairs

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Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.