

# P-06-1225: Make Natural Resources Wales undertake and publish annual wildlife surveys before felling woodland

Y Pwyllgor Deisebau | 10 Ionawr 2022  
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Petition Number: P-06-1225

Petition title: Make Natural Resources Wales undertake and publish annual wildlife surveys before felling woodland

Text of petition: NRW manage state forests but fail to undertake population surveys of protected species before felling woodland. To avoid biodiversity loss they should assess the size of rare species populations present before felling operations are undertaken, so that they ensure habitat loss does not cause decline. The population data should be published before any trees are sold for cutting. Currently they only try and stop rare animals and birds being killed by harvesting machines but this is not enough.

It's not good enough to simply try and avoid killing rare animals when trees are cut down. Birds, bats, dormice, newts need certain types of forest habitat and cutting it down means they can't survive there anymore. Clare Pillman CEO of NRW said 'Mammals like the red squirrel and water vole, birds like the curlew and plants such as the fen orchid squeezed out by loss of habitat loss'. <https://bbc.co.uk/news/uk-wales-58641886...>

NRW need to come clean and survey populations before tree felling takes place and publish the data so the public can see if the agency are causing population declines. They should be taking the lead making sure rare species have enough habitat and not just cutting forests down all the time without showing what this has done to bats and dormice.



## 1. Background

Natural Resources Wales (NRW) manages the Welsh Government Woodland Estates (WGWE). The WGWE accounts for ~40% of the total Welsh Forest Resource and 6% of Wales' total land area. Under the Environment (Wales) Act 2016, NRW has a statutory duty to 'seek to maintain and enhance biodiversity' so far as is consistent with the proper exercise of its functions. In its publication, the purpose and role of Welsh Government Woodland Estate, NRW states:

One of the roles of the WGWE is to maintain, conserve and appropriately enhance the biological diversity of Wales' woodland ecosystems

### 1.1. Woodland certification

The woodlands managed by NRW are dual-certified to the Forest Stewardship Council ® (FSC®) and the Programme for the Endorsement of Forest Certification (PEFC) certification. These accredited forest certification schemes are based on the UK Woodland Assurance Standard (UKWAS), an independent certification standard for verifying sustainable woodland management in the UK. The UKWAS sets out the need to take appropriate measures to protect identified priority habitats and species in accordance with plans agreed with nature conservation agencies.

### 1.2. Forest Resource Plans

NRW details any protected species or priority habitats that could be affected by its operations in a Forest Resource Plan (FRP). This includes operations within the Woodland Management Unit (WMU) or surrounding area, and the impact at a landscape or connectivity scale. FRPs set out long-term objectives and are the basis for 10-year work programmes.

FRPs are updated every ten years, with information gathered from site surveys and the Local Record Centre, which keeps a record of wildlife sightings in the area. The Welsh Government's letter on this petition states:

The redevelopment of FRPs also involves consultation with internal and external stakeholders to provide further information on species and habitat.

### 1.3. European Protected Species

European Protected Species (EPS) have legal protection under the Conservation of Habitats and Species Regulations 2017. EPS found in Welsh Woodlands include:

- 17 species of bat;
- Dormice;
- Great crested newts; and
- Otters.

NRW provides species specific guidance on how to determine if EPS species are present in a woodland and what to do if they are. Work which will disturb or harm protected species or their habitat requires a protected species license.

The Welsh Government's letter on this petition states:

A Habitat Regulation Assessment (HRA) is [...] undertaken where necessary in relation to European Protected Species (EPS), detailing the mitigation measures needed during operations. This entails considering the effects that operations could have on protected species and the extent of the habitat required to support that species both within and outside the WMU.

Site surveys are undertaken as part of the coupe [an area of felled trees] planning process within the FRP, to establish if any additional constraints are present. If EPS are in the vicinity of the operational coupe, an EPS Licence is applied for and the appropriate mitigation measures are listed in the coupe plan such as exclusion zones (no operations permitted to protect a required proportion of the habitat) and timing of restrictions. This is also done for other protected species if these are within the vicinity of the coupe.

### 1.4. Publicly available information

FRPs are placed on NRW's public register to provide further opportunity for external consultees to feedback and comment on the plans.

The Welsh Government's letter on this petition highlights that the survey data collected to inform the FRP, and coupe plans within it, are 'not shared externally due to the sensitivity of the data'.

## 2. Welsh Government action

The Welsh Government's approach to wildlife surveys connected to felling woodland is outlined in the Background section of this briefing and the Welsh Government's letter on this petition.

## 3. Welsh Parliament action

On 8 December 2021, the Senedd debated a related petition, P-06-1208, which calls for new laws to protect the habitat of red squirrels.

In the debate, Darren Miller MS, the Wales Environment Link red squirrel species champion in the Senedd, highlighted there is "no obligation whatsoever" to update or refresh FRPs to reflect red squirrel population changes on an annual basis. He advocated for updating 10-year plans more frequently to protect wildlife populations.

In her response, Julie James, Minister for Climate Change, stated the Welsh Government and NRW were discussing "how close to the actual felling operation a resurvey of the site for differing habitat conditions [...] should be". She highlighted that a resurvey would not be done for every site, and that "factors" would be considered when making decisions on the matter.

Every effort is made to ensure that the information contained in this briefing is correct at the time of publication. Readers should be aware that these briefings are not necessarily updated or otherwise amended to reflect subsequent changes.