

HRLN 14 - Evidence from: Botanical Society of Britain and Ireland (BSBI)

Senedd Cymru | Welsh Parliament

Pwyllgor Newid Hinsawdd, yr Amgylchedd a Seilwaith | Climate Change, Environment, and Infrastructure Committee

Atal a gwrthdroi colli natur erbyn 2030 | Halting and reversing the loss of nature by 2030

1. Your views on the effectiveness of current policies / funds / statutory duties in halting and reversing the loss of nature by 2030.

(We would be grateful if you could keep your answer to around 500 words).

We welcome the following attributes of the White paper:

- embed environmental principles in Welsh law,
- establish an environmental governance body, and
- introduce targets and statutory duties for the protection and restoration of biodiversity in Wales

1. Strategic approaches

Recent Welsh environmental legislation and policies (some of which is pioneering) have creatively responded to the existentialist threat of climate change and biodiversity loss, however, sometimes there has been a slow piecemeal approach to developing policy tools and other forms of support. For example, the Nature Recovery Action Plan themes were comprehensive but the associated delivery plans sometimes had a very short shelf-life (2020 - 2021) and they were not updated very quickly. Out-of-date delivery plans could lead to a focus on a few simpler actions e.g. tree planting, planting for pollinators and doesn't enable the landscape-scale actions that are necessary. A strategic habitat-based approach, for example, the National Peatland Action programme, is a good model for meeting complex environmental challenges but requires a long-term up-to-date delivery plan with active policy support. A similar strategic approach for grasslands, freshwater habitats, and landscape connectivity, should be adopted and reflected in any action plans.

1. Funding

This FY (2023/24), we have witnessed significant budget cuts to the Natural Sciences Department at the National Museum of Wales, and to the National Botanical Garden of Wales. This will affect Wales' capacity to conserve the Welsh flora in ex-situ collections, and the ability of researchers to understand botanical taxonomy, genetics and the impacts of environmental change. It will also reduce opportunities to engage the public on the topic of plant conservation.

Similarly, within NRW there is a significant risk that it will be unable to provide specialist ecological advice without a full complement of biodiversity staff, for example, it no longer has upland and heathland specialist advisors in post.

Public funding has sometimes been offered at short notice for a limited period (one financial year), which precludes more ambitious larger scale or complex projects and leaves organisations struggling with the capacity to respond to a short-lived "windfall" and build long-term relationships with stakeholders.

2. Your views on the progress towards implementing the Biodiversity Deep Dive recommendations.

(We would be grateful if you could keep your answer to around 500 words).

1. The 30 x 30 target - what will it achieve?

The 30 x 30 target is a minimalist policy-driven goal designed by the Convention of Biological Diversity (CBD) to reduce (not halt) the risk of species extinction by 50%, and therefore should only be regarded as a milestone en route to 50 x 50 i.e. 50% by 2050. If we do "business as usual" we will not reach 50 x 50 and we will experience multiple species extinctions and continued biodiversity decline.

In Wales, if we include National Parks and Areas of Outstanding Natural Beauty (AONB), then we are already close to having 30% of landcover under additional environmental protection (29.6%). ANOBs and National Parks have the real potential to deliver landscape scale approaches, but it may require amendments to their statutory duties and powers.

The capacity of Other Effective Area-based Conservation Measures (OECM) to contribute to meeting the 30 x 30 aspiration should be critically appraised in the context of how much they could realistically contribute above existing requirements to meet regulatory and statutory duties in the wider countryside.

There are no OECMs in the UK or Europe so they merit further investigation to assess their benefits and limitations. Consider how they might operate within the existing Welsh environmental legislative and policy framework, for example, OECMs could contribute to the land-use matrices within a resilience ecological network (REN) if a higher regulatory floor could be applied.

The condition of the 30% land cover is fundamental to reducing extinction risk so a comprehensive set of measurable targets with components relating to the four attributes of Ecosystem Resilience are required. The recovery goal should relate to a baseline reference state. The Wildlife Trusts recommend that the baseline reference should be based on 1970s evidence. (Environment Link, 2021).

2. Joined-up legislation and policies?

Links between related legislation addressing the drivers for environmental change should be strengthened and transparent. We support the view of RSPB Cymru that “The two consultations – on the Sustainable Farming Scheme and on a White Paper on environmental principles, governance and biodiversity targets – scarcely mentioned one another, yet in reality their prospects are inseparable”

More recent legislation (WbFG Act 2015, and Environment (Wales) Act, 2016) has introduced an integrated approach that recognises the links between all these attributes by introducing the principles of Sustainable Management of Natural Resources (SMNR), however, the legislation and underlying purposes used to notify protected areas, for example, SSSI, AONBs etc, currently remain unchanged. Also, older legislation pre-dating our current understanding of ecosystems goods and services should be reviewed to check for cross-compliance, for example, the legal requirement of the Forestry Act 1967 to replant after felling sometimes conflicts with the potential restoration of a priority habitat.

3. Addressing data and evidence gaps

The depth and breadth of biological records held in Wales is underpinned by the committed actions of a skilled and dedicated volunteer base, for example, the Botanical Society of Britain and Ireland (BSBI) Atlas 2020. This project, which relies on long-term datasets of records collected by BSBI members, charts the trends in abundance and distribution of native and non-native vascular plant species.

Support for acquiring biological recording skills and the NGOs that foster them is crucial and could be a cost-efficient use of public money to acquire data and assist in filling some evidence gaps.

3. Your views on current arrangements for monitoring biodiversity.

(We would be grateful if you could keep your answer to around 500 words).

Biodiversity monitoring is inadequate and the budget to NRW was cut by one third shortly after the organisation was established. This reduced their capacity to monitor and report on protected sites and species condition and assess air and water quality. It also has affected the integrity of their long-term data sets. The impact of this was clearly evidenced in NRW's Protected Sites Baseline Assessment 2020, which concluded that 55% of Wales' protected sites for terrestrial biodiversity had an unknown status (and 29% unfavourable).

Monitoring and reporting should become a statutory duty for NRW or at least consistently included in the WG remit letter. Without effective monitoring, we lack the evidence to fully understand the cause of species declines and habitat degradation, which in-turn constrains enforcement and conservation action.

4. Your views on new approaches needed to halt and reverse the loss of nature by 2030.

(We would be grateful if you could keep your answer to around 500 words).

1. Be ambitious, move faster and be more strategic.
 2. Make a long-term financial commitment.
 3. Monitoring should become a statutory duty so that NRW has to create a ring-fenced budget for assessing and reporting on protected sites and species.
 4. More effectively support early career conservationists to develop skills in species identification and ecological monitoring. Training in these areas in the higher education sector has hugely declined over the past few decades, and there are few opportunities to develop these skills in the workplace.
 5. Recognise the value of good data and evidence and support NGOs and public bodies that foster the development and acquisition of those skills and interpretation of that knowledge. Support for NGOs that focus on biological recording is critical – through the data that their members collect, these
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organisations are typically those that conduct assessments on species conservation status and draw up national red lists.

6. Consider how the management and statutory roles of existing landscape / protected sites designations could be enhanced to contribute to meeting the 30 x 30 target

5. Do you have any other points you wish to raise within the scope of this inquiry?

(We would be grateful if you could keep your answer to around 500 words).

Welsh Gvmt must ensure that existing habitats that are important for biodiversity are not lost or damaged by tree planting to meet net zero targets, for example by planting on species-rich grasslands or on deep peat. In England, the BSBI has been working with Natural England and Forestry Commission to develop a series of botanical heatmaps that can be used to help inform decision-making around the siting of new woodlands and such an approach would also be valuable in Wales.

FYI: This response has drawn on evidence from these references:

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