

**EPGBTWB 09 - Tystiolaeth gan: Cyd-bwyllgor Cadwraeth Natur | Evidence from: Joint Nature Conservation Committee**

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Senedd Cymru | Welsh Parliament

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

Bil yr Amgylchedd (Egwyddorion, Llywodraethiant a Thargedau Bioamrywiaeth) (Cymru) | Environment (Principles, Governance and Biodiversity Targets) (Wales) Bill

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**1. What are your views on the general principles of the Bill, and is there a need for legislation to deliver the stated policy intention?**

JNCC supports the intention of the Bill, including the stated environmental objective and principles, the provisions to address the environmental governance gap that has emerged following the UK's exit from the EU, and the framework for establishing statutory biodiversity targets.

From the perspective of JNCC's international remit, putting nature targets on a statutory footing has the potential to help Wales match the urgency and challenge of implementing the Kunming-Montreal Global Biodiversity Framework (GBF) and other multilateral environmental agreements.

Embedding environmental principles into legislation is crucial for ensuring Wales responds to the nature emergency with the seriousness and urgency it demands. By placing the application of the environmental principles duty across all policy-making areas, it will help to ensure environmental protection is integrated across all sectors which is essential if we are to meet both international and domestic commitments and address the nature and climate emergencies. By placing these principles on a statutory footing, they become a stronger lever for guiding consistent, accountable and forward-looking decision-making across all sectors.

The proposed legislation signals Wales' clear commitment to addressing the nature and climate emergencies, ensuring that environmental considerations are not sidelined and are instead integrated into policy and practice, delivering a coherent, cross-government response.

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JNCC's response focuses on Part 3 of the Bill, which sets out the framework for establishing statutory biodiversity targets.

**2. What are your views on the Bill's provisions (set out according to Parts below), in particular are they workable and will they deliver the stated policy intention?**

- **Part 1 - Environmental objective and principles (sections 1 to 7)**

**3. What are your views on the Bill's provisions (set out according to Parts below), in particular are they workable and will they deliver the stated policy intention?**

- **Part 2 - The Office of Environmental Governance Wales (sections 8 to 32 and Schedules 1, 2 and 3)**

**4. What are your views on the Bill's provisions (set out according to Parts below), in particular are they workable and will they deliver the stated policy intention?**

- **Part 3 - Biodiversity targets, etc (sections 33 to 38)**

JNCC welcomes the introduction of statutory targets for Biodiversity in Wales. We support the four target areas and their alignment with the wider Global Biodiversity Framework (GBF). We are encouraged to see that the Bill outlines that the GBF targets will guide how Welsh Ministers develop biodiversity targets. Careful consideration should be given to the GBF targets and the commitments set out in the UK's National Biodiversity Strategy and Action Plan (NBSAP) when setting Wales' statutory targets. JNCC supports the notion of aligning the monitoring and reporting introduced through this Bill with the monitoring framework of the GBF, allowing for streamlined reporting at both national and international levels.

Statutory targets will, however, succeed or fail on the efficacy of the policies that underpin them. In our cross-UK positioning, JNCC aims to act as a "policy lab" that

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tracks emerging biodiversity policy and legislation across the four nations, enabled by devolution, and provides the comparative analysis and predictive modelling capabilities to evaluate which approaches produce effective outcomes for biodiversity. This objective is articulated in our 2030 strategy - 'Together for Nature'. The emergence of statutory nature targets across Wales, Scotland, and England puts each nation in a position to capitalise on JNCC's birds-eye view and expertise to learn which frameworks and implementation approaches from across the UK are effective and adapt accordingly.

In support of this, JNCC are working to evolve the UK-level biodiversity indicator suite to enable disaggregation of the data for each nation, where possible, and to be sufficiently sensitive to allow for comparison of the policy outcomes between them. Additionally, JNCC has been an active member of the Biodiversity Targets Advisory Panel, providing evidence to support decision-making around target priority areas. We are working closely with Welsh Government to undertake a gap analysis of biodiversity indicators, to support the production of a monitoring framework for reporting on Wales' statutory targets. Alongside this, JNCC is undertaking predictive modelling to provide evidence to inform Welsh Government in defining ambitious but feasible statutory targets.

In summary, JNCC welcomes the Bill's provisions regarding biodiversity targets in Wales, and supports the setting of evidence-based, ambitious targets to drive change and address the nature and climate emergencies.

## **5. What are your views on the Bill's provisions (set out according to Parts below), in particular are they workable and will they deliver the stated policy intention?**

- **Part 4 - General (sections 39 to 45 and Schedule 4)**

## **6. What are the potential barriers to the implementation of the Bill's provisions and how does the Bill take account of them?**

Monitoring and evaluating progress against environmental targets presents significant challenges, particularly given the complexity and interconnectedness of environmental systems. Traditional status-based indicators, while essential, can lack the responsiveness needed to inform timely adaptive policy interventions. To address this, there is a pressing need for a more comprehensive suite of indicators

that includes not only environmental status but also pressures-based and actions-based measures. These can help track the drivers of change and the effectiveness of interventions. Furthermore, effective delivery requires robust local monitoring and evaluation mechanisms that can capture spatial variation, inform place-based decision-making, and support adaptive management. Strengthening these elements is critical to ensuring that setting biodiversity targets leads to tangible outcomes on the ground.

**7. How appropriate are the powers in the Bill for Welsh Ministers to make subordinate legislation (as set out in Chapter 5 of Part 1 of the Explanatory Memorandum)**

**8. Are any unintended consequences likely to arise from the Bill?**

**9. What are your views on the Welsh Government's assessment of the financial implications of the Bill as set out in Part 2 of the Explanatory Memorandum?**

**10. Are there any other issues that you would like to raise about the Bill and the accompanying Explanatory Memorandum or any related matters?**