

## **EPGBTWB 43 - Tystiolaeth gan: Y Rhwydwaith Ffermio er Lles Natur | Evidence from: Nature Friendly farming Network**

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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?**

### **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)**

We welcome the Welsh Government's aim to embed environmental principles into Welsh law. Welsh farmers are already familiar with operating under the environmental principles because they were previously established under EU legislation. However, from an agricultural perspective regulation and enforcement must be fair and proportionate. A cooperative approach is essential to maintain trust between farmers and the Welsh Government. Farmers should be given a reasonable amount of time to correct any breaches or failures before penalties are applied, with follow-up inspections to assess their progress. For repeat offenders or those who intentionally cause environmental damage, regulations must be robust enough to deter such behaviour and ensure accountability by upholding the polluter pays principle.

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### **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)**

Since Brexit the role of EU environmental principles has changed, and the environmental governance structures no longer apply in Wales. This governance gap left Wales with one of the weakest environmental governance structures in western Europe. The publishing of this Bill is a step in the right direction in giving the environment the protection it deserves.

We have concerns about the potential lack of independence of the proposed Office of Environmental Governance Wales. The appointment of the OEGW's board members lies almost entirely in the hands of Welsh Ministers. A greater oversight role for the Senedd should be considered. The Bill could be amended to clarify that Welsh Ministers have no power of direction in relation to the OEGW.

### **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)**

We welcome the Welsh Government's new duty to set biodiversity targets and create a strategy to achieve them. With over 80% of Wales under agricultural use, farming will be central to reaching these goals. The Sustainable Farming Scheme (SFS) is poised to be a primary driver in supporting farmers, particularly through its Optional and Collaborative layers. However, the £102 million allocated to these layers for the 2026 scheme year presents a significant funding gap, whilst the lack of long-term funding commitment is also a concern. An independent economic report recommends the Welsh Government increase its investment in nature-friendly farming to £594 million per year over the next decade. This substantial increase is deemed essential to meet Wales' legally binding nature restoration and climate targets.

Consider also that nature degradation could cause a 12% loss to UK GDP with agriculture in particular facing higher levels of nature-related financial risk.

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Increasing regulatory pressure is unlikely to meet biodiversity targets unless it's paired with sufficient support.

**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?**

**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?**

