

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

Our ref/ein cyf: HID-PO-477-25

Llyr Gruffydd MS  
Climate Change, Environment and  
Infrastructure Committee  
Senedd Cymru  
Cardiff Bay  
CF99 1SN

29 September 2025

Dear Llyr,

### **Environment (Principles, Governance and Biodiversity Targets) (Wales) Bill**

At the committee evidence session on 18 September, I committed to provide clarity on

- 1) Engagement with the WLGA during the Regulatory Impact Assessment (RIA) process
- 2) Outline the statement made in committee providing the rationale for excluding the requirement for both Long-Term and Short-Term Biodiversity targets on the face of the Bill

### **Engagement with the WLGA during the RIA Process**

Throughout the policy development, officials have been engaging with WLGA directly and within stakeholder groups, alongside individual local authorities, to understand and discuss the potential impact of a variety of policy options on Local Authorities. This engagement provided essential input into the options that are presented in the Regulatory Impact Assessment and informed the recommended options.

To support the development of the Cost Benefit Analysis for the Regulatory Impact Assessment, Welsh Government contracted the services of The Young Foundation. The Young Foundation held a series of one-to-one interviews with stakeholders, convened a review panel and sought feedback from Stakeholders on their draft report.

The Young Foundation held a one-to-one interview with the WLGA on 9 January. The WLGA were also invited to three different panel sessions across January and February, and their feedback was sought on the draft report on 5 March. WLGA declined the invitations to attend the panel sessions and no comments were received from WLGA on the draft report.

Canolfan Cyswllt Cyntaf / First Point of Contact Centre:  
0300 0604400

Bae Caerdydd • Cardiff Bay  
Caerdydd • Cardiff  
CF99 1SN

[Gohebiaeth.Huw.Irranca-Davies@llyw.cymru](mailto:Gohebiaeth.Huw.Irranca-Davies@llyw.cymru)  
[Correspondence.Huw.Irranca-Davies@gov.wales](mailto:Correspondence.Huw.Irranca-Davies@gov.wales)

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.

The Young Foundation's [final report](#) was published alongside the Bill on Introduction in June. The Regulatory Impact Assessment builds upon the Quantative and Qualitative Analysis presented in this report.

My officials will engage further with the WLGA to ensure that any concerns that have arisen since the RIA was published can be considered. However, we are confident that the RIA reflects a wide cross-section of views sought during engagement with stakeholders, including local authorities, and are confident in the strength of the estimates provided.

A further Regulatory Impact Assessment will be undertaken when introducing the Biodiversity Targets through Secondary Legislation and we will be undertaking further engagement with stakeholders to inform this. We will ensure that all key stakeholders are fully engaged in this process.

### **Outline the statement made in committee providing the rationale for excluding the requirement for both Long-Term and Short-Term Biodiversity targets on the face of the Bill**

By not stating a specific requirement or timeframe for targets on the face of the Bill, we are able to adopt a more flexible approach, allowing us to set a range of short, medium or long-term targets. We believe this flexibility is required to address the complexities of environmental systems which do not always respond in a linear fashion to interventions.

We want to make sure that we are able to set the most appropriate timeframe for different targets. For example, a target to determine the condition of all of our protected sites is likely to be a short-term target. On the other hand, a habitat extent and condition target is likely to require a longer timeframe as it can take decades for some habitats to become established. The Bill as currently drafted would enable us to deliver both of these options.

We are committed to ensuring that the right targets are developed that will deliver the impact required to tackle the nature emergency. Each target will be tested using scenarios and modelling to ensure it is ambitious and can meaningfully contribute to halting and reversing biodiversity loss yet are deliverable and achievable. The timescales are likely be different for targets in each of the priority areas reflecting the differing range of actions to drive the change. Specifying timescales on the face of the Bill could, therefore, limit the types of targets that could be considered.

As I outlined in Committee, I would welcome any suggestions on how setting such timeframes for target durations can be achieved while also allowing for the flexibility to set a range of targets to meet the complexities of environmental systems.

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