

Effective implementation of the Ecosystem Approach: achieving a resilient Wales

WEL supports the development of an Ecosystem Approach in Wales. However, we are not convinced that the definition, objective and principles of sustainable management of natural resources (SMNR) fully reflect the ecosystem approach described under the CBD. In particular, we are not convinced that the conservation element of the ecosystem approach is sufficiently explicit.

The Bill does not supplant existing nature conservation tools, but we feel it misses the opportunity to be explicit about the role of SMNR (and therefore of NRW) in halting and reversing biodiversity loss. As such, the Bill's provisions could be interpreted in a largely utilitarian way – leading to the development of SMNR which is biased towards use; an Ecosystem Services Approach not an Ecosystem Approach.

We are informed that this is not the intention of the Welsh Government, so we believe this part of the Bill could be amended to clarify the essential role of the new framework in delivering conservation and protection of the environment. This is particularly important because Sections 3 and 4 are central to the new general purpose of Natural Resources Wales, and will undoubtedly affect the way the body's role is interpreted in the future.

Halting and reversing the loss of biodiversity

Linked to our concerns above, is our concern that Part 1 does not contain a clear driver for halting and reversing biodiversity loss. It also lacks provision for measuring progress in this area, in spite of the Welsh Government's recognition of biodiversity loss as a critical issue, alongside climate change. We welcome the biodiversity duty with its new reporting requirements, but feel the Bill would be strengthened by:

- providing focus on measurable outcomes;
- providing an overall mechanism for measuring and reporting on the effectiveness of activities undertaken towards these outcomes; and
- providing stronger Government leadership and accountability, with a process to identify remedies if outcomes are not delivered.

Our recommendation is to include biodiversity targets within the Bill and a detailed briefing on what these targets should be and how they could be measured is provided with this letter.

Protecting and enhancing our landscapes and seascapes

Another concern of WEL is that the Ecosystem Approach as set out in the Bill does not fully address issues associated with the protection of landscape and seascape character. It needs to be appreciated that landscapes are different from ecosystems. They are places where ecosystems exist and they provide an important context for managing natural resources in an appropriate and integrated manner.

Landscapes and seascapes reflect the cultural values and associations people have with nature. Article 5 of the European Landscape Convention makes it clear that landscapes should be recognised in law as 'an essential component of people's surroundings, an expression of the diversity of their shared cultural and natural heritage, and a foundation of their identity.' Given the particular influence that cultural associations and heritage values have on a location's identity, it follows that these considerations should be embedded in the principles of sustainable management of natural resources.

We hope that you find these further, expanded views on Part 1 of the Bill helpful in considering the Committee's response at this stage. If you need any further information or explanation, please do not hesitate to get in touch.

Yours sincerely,



Annie Smith, Chair of WEL's Natural Resources Working Group