

Agenda – Climate Change, Environment and Rural Affairs Committee

Meeting Venue:

Committee Room 3 – Senedd

Meeting date: Wednesday, 24 May
2017

Meeting time: 09.30

For further information contact:

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1 Informal private discussion

(09.30 – 10.20)

(Pages 1 – 5)

- Inquiry into forestry and woodland policy in Wales – feedback following rapporteur visits.
- Discussion of Committee's options for visits as part of inquiry into forestry and woodland policy in Wales.
- Preparation for oral evidence sessions.

Attached Documents:

Paper on proposed visit to Maesteg

Royal Welsh Agricultural Show (RWAS) options paper

Break (10.20–10.30)

2 Introductions, apologies, substitutions and declarations of interest



Cynulliad
Cenedlaethol
Cymru

National
Assembly for
Wales

3 Inquiry into forestry and woodland policy in Wales – third sector evidence

(10.30 – 11.30)

(Pages 6 – 41)

Jonathan Cryer, Land Use Policy Officer – RSPB Wales

Frances Winder, Conservation Policy Lead – Woodland Trust Wales

Attached Documents:

Background Brief

Research Brief

Paper 1 – RSPB Cymru

Paper 2 – Woodland Trust

4 Inquiry into forestry and woodland policy in Wales – academic evidence

(11.30 – 12.30)

(Pages 42 – 43)

Dr Alec Dauncey, Teaching Associate – School of Environment, Natural Resources and Geography, Bangor University

Professor Elizabeth Robinson, Professor of Environmental Economics – Reading University

Attached Documents:

Paper 3 – Dr Alec Dauncey – Bangor University

5 Papers to note

(12.30 – 12.35)

Correspondence from Blaise Bullimore with additional information following his oral evidence session on 5 April 2017, as part of the inquiry into the management of Marine Protected Areas

(Pages 44 – 54)

Attached Documents:

Paper 4 – Paper to note – Correspondence from Mr Bullimore

Additional information from Jim Evans, following his oral evidence session on 30 March 2017, as part of the inquiry into the management of Marine Protected Areas

[Additional information from Jim Evans.pdf](#)

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Agenda Item 3

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RSPB Evidence to the Climate Change, Environment & Rural Affairs Committee Inquiry into Forestry & Woodland Policy in Wales.

1. Introduction:

1.1 Cymru welcomes the opportunity to participate in the Committee's inquiry into Forestry and Woodland Policy in Wales, and we would welcome the opportunity to illustrate some of the points raised through visits to relevant sites to discuss the issues in more detail.

1.2 RSPB Cymru's objectives in relation to forestry and woodland include:

- The protection and enhancement of existing native woodlands, through appropriate management to support priority species and habitats.
- Ensuring new woodland creation is appropriately located to avoid negative impacts on biodiversity.
- The protection and restoration of open habitats including peatlands, heathlands and priority grassland habitats.
- Promoting a new Sustainable Land Management policy for Wales which integrates all areas of land use including woodland and forestry policy.

2. Key Recommendations

2.1 We urge the Welsh Government to undertake the following recommendations:

- a) Develop a new overarching Sustainable Land Management policy for Wales that combines agriculture, forestry and the environment and provides an incentive framework for multiple benefits.
- b) Establish grant support for woodland management to protect our internationally important woodland habitats and the biodiversity they support.
- c) Ensure the 'right tree in the right place' principle is adhered to, to protect against environmental damage including impacts on open habitats and the species they support.
- d) Ensure appropriate monitoring is in place to fully evaluate the effects of tree planting on biodiversity.
- e) Take steps to address the current damage to open habitats caused by existing forestry, including impacts on neighbouring open habitats of international importance.

3. Delivery of Woodlands for Wales Strategy

3.1 The 2016 State of Nature report¹ showed that 11% of woodland species in Great Britain are threatened with extinction, and climate change is one of the key pressures on biodiversity. At present there is little evidence to suggest the Woodlands for Wales Strategy is delivering for woodland biodiversity at the scale required to deliver on Wales' international commitments to biodiversity. If we are to see real progress in delivering our biodiversity commitments there will need to be a step change in the approach and implementation of policies linked to woodland and forestry biodiversity.

4. Responding to climate change –

4.1 When considering how woodlands and forestry can contribute to Wales' response to climate change there are a number of factors impacting on biodiversity, these include:

- The availability of suitable habitat of sufficient quality and extent.

4.2 In order to allow woodland biodiversity in Wales to adapt to climate change we must ensure our existing woodlands are of sufficient quality to support resilient populations that are able to adapt to the pressures of climate change. Since the withdrawal of Glastir Woodland Management, Wales has no specific mechanism to support management for woodland biodiversity. This lack of management means many of our woodlands, including sites designated to support populations of internationally important species are deteriorating in quality and thereby failing to provide the conditions required to allow priority species to adapt to climate change.

- Restoring afforested peatlands and other afforested habitats to improve the resilience of the ecosystems to aid climate change adaptation.

4.3 Our greater understanding of ecosystems and how they function has shown that historical decisions on the location of woodland plantations, driven by the need to secure a national timber resource, have led to degradation of ecosystems and contributed to the release of large amounts of carbon formerly locked up in peat rich soils, permanent grassland habitats and native woodlands. In order to secure the future of these habitats we must ensure they are restored to form resilient habitat networks that are better able to adapt to climate change, and therefore can continue to provide the range of ecosystem services on which we depend.

- Connecting fragmented habitats.

4.4 Improving the quality and extent of available habitat and the restoration of afforested habitats is only part of the puzzle in ensuring Welsh ecosystems are resilient in the face of climate change. If we are to secure the future for a range of ecosystems ensuring habitats are

¹ Available at: <https://ww2.rspb.org.uk/our-work/stateofnature2016/>

suitably connected to allow the species they support to move in response to changing climate and to connect with wider welsh populations to provide genetic diversity and thereby population resilience is critical. Without this connectivity fragmented habitats are more susceptible to the impacts of climate change and isolated populations of wildlife are less able to adapt.

- Ensuring end use of timber is factored in when calculating the carbon benefits of woodland creation.

4.5 When considering the contribution forestry can make to responding to climate change the end use of timber products must be considered. Whilst fast growing conifer species may provide an initial boost to carbon sequestration, the end use of this timber can significantly impact on the carbon benefits. In comparison broadleaf species as part of multi-purpose woodlands can provide longer term benefits for carbon whilst providing habitats for species and a range of additional benefits. Ensuring these factors are considered when targeting support for tree planting to provide carbon benefits is critical.

5. Woodlands for people – serving local needs for health, education and jobs.

5.1 Recent Welsh Government decisions on woodland and forestry have been driven by delivering the target of 100,000ha of new woodland in Wales by 2030. RSPB Cymru believes that a focus on a simplistic area target has potential to drive perverse outcomes that negatively impact on delivery of a range of ecosystem services including biodiversity, water quality and carbon storage. A targeted approach to tree planting based around delivery of multiple benefits would be far more positive and would encourage more sustainable tree planting. For example encouraging and supporting tree planting aimed at delivering for biodiversity, which would provide additional benefits in terms of carbon, water and recreation benefits would represent a greater public benefit than an approach solely focused on timber production or maximising carbon storage which could actually cause harm to the environment.

6. A competitive and integrated forest sector – innovative, skilled industries supplying renewable products from Wales.

6.1 The Welsh Government has a series of long-standing international commitments and domestic obligations to ensure forestry in Wales is carried out in a sustainable manner to deliver a range of environmental, social as well as economic benefits, including the protection and enhancement of biodiversity. The UK Forestry Standard ² (UKFS) provides a *minimum standard* which Welsh Government must ensure is met by all woodland owners, including on agricultural land and through the planning system, however we understand there is little or no on the ground monitoring to ensure woodland and forestry planted with grant support is meeting the UKFS. In order for Wales to achieve its international commitments to biodiversity we must ensure all grant funded woodland and forestry creation is delivering its obligations under the UKFS and this can only be sufficiently assured through monitoring of the impacts of new woodland and forestry.

² <https://www.forestry.gov.uk/ukfs>

Environmental quality – making a positive contribution to biodiversity, landscapes and heritage and reducing other environmental pressures.

7. Woodland Creation

7.1 A key factor in future woodland creation must be adherence to the ‘right tree in the right place’ principle. Ensuring woodland creation meets the minimum requirements as set out in the UK Forestry Standard including in relation to protecting priority habitats and species is critical, and consideration of impacts on open habitats and the species they support must be central to locating new woodlands. The current Welsh Government Woodland Opportunities map³, used to guide woodland creation in Wales, offers some consideration for priority species but this is limited and is subject to the quality of the underlying data. In order for the map to be of real value in the long term regular updating of the underlying data must be undertaken including appropriate species and habitat surveys.

7.2 At present there is a lack of monitoring of the cumulative impacts of tree planting on biodiversity, Glastir Woodland Creation and the Glastir Small Grants scheme, underpinned by the 100,000ha tree planting target, are driving small scale tree planting. With the aspiration to increase tree planting under Glastir we must ensure the wider impacts of tree planting on biodiversity are monitored and fully understood if woodland and forestry in Wales is to be truly sustainable.

8. Woodland Management

8.1 The lack of a targeted scheme for woodland management has limited the ability to deliver positive contributions to biodiversity. Whilst grant funding has focused on woodland creation, restoration of forestry and woodland impacted by disease and supporting timber businesses there has been little support for woodland management which contributes to biodiversity, landscapes and heritage and reducing environmental pressures. The lack of a woodland management scheme also restricts the ability to bring the 80,000ha of existing unmanaged woodland in Wales into management which could provide a significant contribution to meeting Wales’ international commitments to biodiversity as well as helping species adapt to climate change. Bringing these woodlands into management could also provide economic and social benefits.

8.2 Some of the most important woodlands in Wales are the Atlantic Oak Woodlands found in Mid and North West Wales, these ancient woodlands are home to a wide variety of species including internationally important lower plant communities such as the lobarion lichen communities, and birds such as redstarts and pied flycatchers, migrant species that travel from Africa to spend their summers in the woodlands of Wales.

³ <http://lle.gov.wales/catalogue/item/GlastirWoodlandCreationOpportunitiesMap/?lang=en>

8.3 Wales holds 40% of the UK's Atlantic Oak Woodlands and their importance is reflected in their international designation as Special Areas of Conservation. If Wales is to achieve its international commitments to biodiversity then securing these priceless ancient woodlands is critical. The implementation of current Welsh Government policy contradicts the guidance on how to manage these woodlands, for woodland entered in the former Glastir scheme there was a presumption against grazing, directly contravening the advice given by NRW that grazing is required to maintain the right conditions for many of the priority species. Where light grazing was allowed, the levels of grazing were far too low to overcome the historic lack of grazing, thereby limiting the ability of the sites to achieve favourable condition. In addition scheme rules restricted any activity above and beyond that funded through the scheme, meaning additional positive management for biodiversity is discouraged. If we are to secure these Celtic rainforests for future generations then addressing the mismatch between policy and the requirements of the habitats is critical and must be reflected in future support mechanisms.

8.4 RSPB Cymru has worked with NRW and Welsh Government to overcome some of the hurdles on a number of sites, however many private woodland owners would have neither the knowledge or time required to address the issues, future support mechanisms must be sufficiently flexible to allow the requirements of individual sites to be considered and must come hand in hand with expert advice and guidance on how to manage woodlands for priority species and habitats.

9. Protecting Open Habitats

9.1 Due to the historic location of many forestry plantations, including much of the Welsh Governments Woodland Estate, there are many instances where forestry is negatively impacting on habitats of international importance. Non-native species such as sitka spruce are self-seeding on to neighbouring open habitats and leading to the failure of many designated upland sites to achieve favourable conservation status. This has a number of impacts including degrading peatlands, such as blanket bog, and leading to the release of carbon previously locked up in the peat⁴. As well as contributing to climate change these degraded peatlands are less able to store water which can contribute to downstream flooding and the erosion caused by increased run-off can lead to water quality issues driving the need for increased water treatment costs and the subsequent increase in customer prices.

9.2 As well as negative impacts on water and carbon the degradation of these upland peatlands has a significant impact on biodiversity with a number of species that inhabit these areas amongst our most threatened. The curlew a once common and widespread species has declined by over 80% in Wales, and a key factor in their decline is the loss of breeding habitat including that degraded by poorly located forestry plantations.

⁴ A 1% loss of soil carbon per year could increase net Welsh Carbon Emissions by 10% - LUCCG (2010) *Land Use and Climate Change Report*. Welsh Government. Available at: <http://gov.wales/topics/environmentcountryside/farmingandcountryside/farming/land-use-climate-change-group/?lang=en>

9.3 As well as degrading habitat these plantations also contribute to another factor impacting on many upland breeding waders, by providing habitat for predators. In one area of North Wales RSPB Cymru, working with NRW Conservation staff and local landowners are attempting to reverse the fortunes of the local curlew population by improving the conditions for breeding. Whilst agreements have been put in place to achieve appropriate grazing and habitat management, the last piece of the puzzle is removal of inappropriately located shelter belts. These small conifer shelter belts, established through previous grant funding mechanisms, are limiting the success of breeding curlew by harbouring foxes and providing perches for corvids, leading to predation of eggs and chicks. RSPB working with local NRW staff have applied for a felling licence to remove some of the problem trees however consent was declined by NRW, due to the restriction to replant the trees if felled. This balancing of the need to maintain tree cover whilst helping restore biodiversity is a key challenge for the Welsh Government, and in this instance maintaining an aged stand of conifers, which have little commercial value due to the poor quality of the timber, has been prioritised over the need to restore a priority species and the peatland habitat on which the trees were planted.

10. The Well-being of Future Generations (Wales) Act 2015

10.1 The [State of Natural Resources Report](#) (SoNaRR) underlines the role of woods and trees in delivering the goals in the Well-being of Future Generations (Wales) Act⁵, we feel that delivery against the goals is currently falling short due to a lack of action to bring existing woodland into better management to benefit priority species and support for action to secure resilient ecosystems is lacking. Additionally, 'Globally Responsible Wales' is not included in the Action Plan, yet should be a constant focus alongside other elements of the Strategy requiring carbon sequestration and provision of habitat for internationally important species.

11. Contribution to the Environment (Wales) Act 2016

11.1 Ecosystems in Wales have undergone significant degradation resulting in negative impacts on biological diversity. None of Wales' ecosystems are resilient, severely impairing their capacity to provide essential ecosystem services. Therefore, before we can maximise the benefits from ecosystems we must first restore and enhance them.

11.2 Ecosystem restoration is a significant part of the Ecosystem Approach (Principle 5 of the Convention on Biological Diversity, Ecosystem Approach Principles⁶) and thus the sustainable management of natural resources (SMNR) in informing the negotiation of land use options and enhancement of healthy ecological networks. The Woodlands for Wales Strategy should be integral to the development of the Area Statements, including the need to plant urban trees and consider the landscape.

⁵ See pg9 of the [Summary](#).

⁶ Principle 5: Conservation of ecosystem structure and functioning, in order to maintain ecosystem services, should be a priority target of the ecosystem approach. Ecosystem functioning and resilience depends on a dynamic relationship within species, among species and between species and their abiotic environment, as well as the physical and chemical interactions within the environment. The conservation and, where appropriate, restoration of these interactions and processes is of greater significance for the long-term maintenance of biological diversity than simply protection of species. <https://www.cbd.int/ecosystem/principles.shtml>

12. Leaving the European Union

12.1 As the UK transitions away from the Common Agricultural Policy, we must develop a new sustainable land management policy for Wales that supports not only sustainable, but ecologically restorative measures, to address the scale of biodiversity loss and degradation to our ecosystem services.

Paper 2

RESPONSE BY COED CADW (THE WOODLAND TRUST) TO THE INQUIRY INTO FORESTRY AND WOODLAND POLICY IN WALES

April 2017

We all need trees

1. Background and introduction

- a. Coed Cadw Woodland Trust the UK's largest woodland conservation charity, working for a UK rich in native woods and trees, for people and wildlife. In Wales alone we have over 14,000 members and 85,000 supporters. We manage over 100 sites in Wales covering 2,697 hectares (6,664 acres). Wales is one of the least wooded countries in Europe, with woodland making up just 14% of the landscape and less than half of this is native.
- b. Everyone benefits from trees, woods and forests – even if they never see or touch a tree, or walk in a wood. They help supply us with the essentials of life, such as clean air, water, building materials and fuel. Trees offer other riches too: our lives would be far poorer without their place in our landscapes, literature, language and livelihoods.
- c. The end of the CAP provides an opportunity to rethink and improve our environmental future. Previously, separate agriculture and forestry policy have undermined each other in key ways. We have the opportunity now to develop a single new sustainable land management policy for Wales and investment of public money in an incentive framework that is locally designed and delivered, outcome focused and secures benefits for people, the environment and nature as well as an economic future for land managers.

2. Wales is better with trees – key salient points

- a. Coed Cadw Woodland Trust's vision document, Wales is Better with Trees¹, highlights the many benefits that woodland and trees offer to Wales, environmentally, socially and economically. We support, in broad terms, the Woodlands for Wales Strategy, in particular:
 - i. Timber is a key renewable resource, and one that can lock up carbon for years, thus assisting the sustainable development and climate change agendas. Timber can be sustainably produced on a commercial scale provided best practice is applied. This is best defined by the voluntary and independently audited UK Woodland Assurance Scheme (UKWAS). We strongly commend WG and NRW for their

¹ Published January 2016 and available online at: <https://www.woodlandtrust.org.uk/publications/2016/01/wales-is-better-with-trees/>

commitment to manage the public forest estate in accordance with this standard.

- ii. Woodland provides huge services, including protection of water resources, recreational and health benefit and biodiversity. Factoring in these benefits means a typical urban woodland is worth £130,000 per hectare and a lowland broadleaved woodland £150,000 per hectare. Whilst timber value is substantial, the Office for National Statistics calculates the recreational value of woods to be 10 times higher². We would like to see these values acknowledged in public accounts and policy making.
- iii. We strongly support the WG ambition to plant 100,000 ha of new woodland over a 20 year period, implying 5,000 ha pa. But over the last two planting seasons for which we have figures, the rate achieved has been just 100 ha³. A post-Brexit sustainable land use policy that clarifies where planting should be targeted could make all the difference here and also address the need for more diverse and sustainable timber production .
- iv. The WG's interpretation of the EU Basic Payment rules for farmers has penalised Welsh farmers for having trees on their land, despite Welsh Government policies which encourage land managers to plant more trees. The rules required every farmer in Wales to accurately map clusters of trees over 100m², and subtract this from the eligible land area. This was not the case in England or Scotland. The new system needs to be different.
- v. The rapid rise of pests and diseases affecting woodlands and landscapes across the UK threatens biodiversity and timber production and is an issue that requires an urgent and sustained response in Wales, co-ordinated with actions in the other UK countries. We would like to see a plan to ensure that the Welsh countryside is not permanently impoverished by the widespread loss of ash trees.
- vi. Ancient woodland is the richest and most valuable habitat for wildlife we have, covering less than 5 per cent of our land area. It is irreplaceable and cannot be recreated. But despite the protections within planning policy real threats continue, even as a result of developments by the Welsh Government itself. At the end of December 2016 there were 115 ancient woodland under threat in Wales on our records. 80 of these arise from building land allocations in local plans, 24 relate to utility developments and 5 to road schemes (including the M4 relief road). We would like to see the consistent and vigorous enforcement of guidance in Planning Policy Wales.
- vii. It is vital that the WG renews its commitment in the Woodlands for Wales Strategy, broadly, to gradually restore all Planted Ancient Woodland Sites (those that have been replanted with non-native species such as Norway spruce) on its own estate, and to encourage private landowners to do the same. Not to do this would be to support the destruction of a hugely valuable and irreplaceable natural asset. Our evidence shows that commitments to restore Planted Ancient Woodland Sites,

² <https://www.ons.gov.uk/economy/environmentalaccounts/bulletins/ukenvironmentalaccounts/2015-07-09#tab-Woodland-ecosystem-asset-and-services-accounts>

³ [https://www.forestry.gov.uk/pdf/Ch1_Woodland_FS2016.pdf/\\$FILE/Ch1_Woodland_FS2016.pdf](https://www.forestry.gov.uk/pdf/Ch1_Woodland_FS2016.pdf/$FILE/Ch1_Woodland_FS2016.pdf)

including those on the public forest estate, are not being fully acted upon despite the huge biodiversity gains from careful and sensitive restoration. We are however very encouraged by the recent comprehensive commitment by NRW to work with us to fully restore Wales' largest ancient woodland, Wentwood Forest.

- viii. There is currently no statutory protection for Wales' ancient, heritage and veteran trees, a vital and much valued element of our heritage and of international significance. The WG has established a Task and Finish Group to look at providing this; it is vital that the group's recommendations are implemented.
- ix. The trees which have the greatest positive impact on people are probably those in our towns and cities. Compelling international evidence demonstrates the massive health and well-being benefits afforded by tree-filled green space. Yet tree cover in our towns and cities varies from 34% in Trimsaran to just 6% in Rhyl.
- x. In January 2016 a petition⁴ bearing 2,258 signatures was presented to the Assembly, supporting the principle that every town and city in Wales should benefit from a minimum 20 per cent tree canopy cover and calling on the Welsh Government to create a challenge fund to support tree planting to improve the environment where people live, asking for particular support for native species and fruit trees. In presenting this, we drew attention to Forest Research's Wrexham iTree Report ⁵ which demonstrates how the town's trees save the local economy more than £1.3m every year through reduced sewerage charges and in health service savings.
- xi. The WG's excellent Plant! Initiative already funds a tree for every child born or adopted in Wales. Coed Cadw is part of this project, and we believe more could be done to build the connection between children and woods and trees. The Foundation Year of the National Curriculum could be used to ensure that every child can plant a tree themselves. We are particularly keen for schools to work with us to mark the centenary of the First World War with trees, including at our FFW Centenary Wood, Coed Ffos Las in Carmarthenshire.
- xii. Wales needs a public forest estate that is a world-leading exemplar of sustainable development. Covering nearly six per cent of the land, this is a vitally important asset that provides huge benefits for the population. We commend the WG's commitment to keeping it as a public asset. We would like to see decisions made transparently in the public interest, balancing economic, social and environmental objectives and to see the forests diversified to increase resilience, taking advantage of the devastation caused by *P. Ramorum*.
- xiii. The current work of the WG Future Landscapes Wales Working Group provides a particular opportunity to ensure that the management of WG public forest estate achieves, in an exemplary way the vision and aspirations for Wales' National Parks and AONBs. This could include a move towards low impact management within

⁴ More about this here: <http://www.woodlandtrust.org.uk/blogs/woodland-trust/2016/01/give-us-more-trees-in-our-towns/>

⁵ More about this here: <https://www.forestry.gov.uk/fr/bee9t8dzh>

protected landscapes and even a ban on clear-felling within these areas, in all but exceptional circumstances.

3. Responding to climate change

- a. Well-managed woodland, forests and trees have a key role both in mitigating climate change, see paragraph 2a) iii above, and adapting to it.

4. Adapting to climate change

- a. The Land Use and Climate Change group also recognised that creating additional woodland in the right places can be a very effective way to creating landscapes more resilient to extreme weather. Our report 'Holding back the waters'⁶ describes how trees can provide a sustainable and low maintenance solution to lessening the risk of flooding. Trees also maintain water quality and reduce pollution from particulates and fertilisers. The report proposes that the WG plant at least 10 million trees in targeted areas to help reduce flood risk to thousands of homes across the country.
- b. One example of what this could mean in practice is the Pontbren Scheme in Powys. The key report 'The Pontbren Project'⁷, launched by John Griffiths AM in 2013, outlines how ten adjoining farmers have worked together to plant over 120,000 trees and shrubs, create or restore over ten miles of hedges, and create numerous ponds. The success of the Pontbren Scheme provides a model for farmers and policy makers to that could be incorporated into a new sustainable land management scheme to better deliver essential environmental services as part of productive livestock farming.
- c. Ancient woodland is a richly complex ecosystem, with trees, plants, animals, invertebrates, fungi and soil micro-organisms all reacting with other in ways too complex for us to yet fully understand. By restoring Planted Ancient Woodland Sites more areas can once again become rich and varied habitats, re-instating more resilient ecosystems and providing habitat connectivity, and we can move away from more susceptible monoculture plantations in our most important locations.

5. The Well-being of Future Generations

- a. The ground-breaking Well-being of Future Generations Act outlined seven well-being goals that seek to describe a common vision for the Wales we want. It offers an opportunity to ensure woodland and forestry play their full role in helping secure these outcomes.
- b. The [State of Natural Resources Report](#) (SoNaRR) underlines the role of woods and trees in delivering most of the well-being goals highlighted in the Welfare of Future Generations Act⁸:
 - i. A resilient Wales – trees and woods can play a crucial role protecting ecosystems and sustaining wildlife and water as well as providing renewable raw materials. All

⁶ <https://www.woodlandtrust.org.uk/publications/2014/01/holding-back-the-waters/>

⁷ <https://www.woodlandtrust.org.uk/publications/2013/02/the-pontbren-project/>

⁸ On the 9th page of the [Summary](#), though the pages are not numbered.

sectors need to engage in the challenge to produce multi-purpose outputs rather than seek exclusivity for their own particular interests.

- ii. A prosperous Wales – well managed trees and woods contribute substantially not just in terms of the timber and firewood they yield, but also in enhancing resilience and productivity on farms, support water supply and fisheries, enhance biodiversity and provide the attractive landscapes and opportunities for tourism and recreation.
- iii. A healthier Wales – trees and woods do not just provide opportunities for healthy exercise, but also literally clean the air by removing harmful pollutants, shield against noise and water pollution and can help limit flooding.
- iv. An equal Wales – tree planting in areas where most people live helps build community action and aids economic regeneration by ensuring everyone is able to enjoy a more pleasant, leafier environment.
- v. A Wales of cohesive communities – involving communities in tree planting and the use and management of their local woodlands has been shown to improve community cohesion and reduce anti-social behaviour.
- vi. A Wales of vibrant culture and thriving Welsh language – the distinctive cultural landscapes of ffridd, coedcae, hedgerows and ancient trees and woodland have played a significant role in the development of distinct cultural practices and locally specific art and literature.
- vii. A globally responsible Wales – The Welsh Government's ambitious of creating 100,000 ha of new woodland was first conceived as a means of reducing net CO2 emissions from the land-use sector, as well creating more resilient landscapes. It should also reduce dependency on imported timber and environmental damage by poorly regulated forestry overseas.

6. Delivering woodland creation

- a. To deliver its tree planting ambition, it is vital that the WG include meaningful incentives to landowners to plant the right trees in the right place in any post-Brexit sustainable land use policy. It is clear that the response from landowners would be much more positive if the system no longer provided disincentives as it does currently.
- b. More work is needed to more clearly identify land types and locations that are suitable for different sorts of woodland planting, with more focus on enabling beneficial change. We absolutely accept that the grant system should not support tree planting of a type and in a location which would cause environmental damage. Most locations could benefit from small areas of native planting, and there are large areas of low biodiversity landscape where we believe that suitably diverse and well-designed commercial planting could create both economic value and a landscape of generally higher biodiversity than currently exists.

7. Conclusion

- a. The need for action to protect woodlands and trees and to create and plant more has never been greater. Climate change, resource depletion and intensification are driving unsustainable pressures on soil, water resources and biodiversity, while tree disease and the constant pressure of development threaten our woodland resource. We need to act now to ensure that Wales makes the fullest possible use of woodland and trees to tackle these major environmental problems.

Agenda Item 4

Paper 3

Forestry and Woodland in Wales - National Assembly for Wales Climate Change, Environment and Rural Affairs Committee consultation

I am a professional forester with thirty years' experience, mainly in Wales. I was a Forestry Commission Forest District Manager in Ceredigion, and have also worked on forestry and Common Agricultural Policy issues at Defra in London. I have a PhD in forestry policy, and am currently a part-time Teaching Associate at Bangor University, teaching forestry policy and forest management planning. I am a professional member of the Institute of Chartered Foresters.

The views expressed here are entirely my own.

1) Responding to climate change – coping with climate change and helping reduce our carbon footprint. I suggest that the Committee inquire into:

- a) Current and potential scale of woodland creation and carbon sequestration by natural scrub development at (nil cost) on marginal agricultural land.
- b) The need for more assertive measures to remove conifers from bog habitat to maximise carbon storage in peat.
- c) The carbon emissions associated with cultivation of forest soils at replanting.
- d) Net carbon effects of new afforestation on organic soils.
- e) Whether management of 'neglected' broadleaved woodlands increases or reduces total carbon sequestration.
- f) The extent to which woodfuel is genuinely carbon neutral.
- g) Whether continuous cover forestry maintains carbon stocks more effectively than clearfelling systems (since soil exposure and cultivation are avoided).

2) Woodlands for people – serving local needs for health, education and jobs; I suggest that the Committee consider the following approaches:

- a) Greater involvement of local communities in forest design and management.
- b) A greater role for local authorities, including Community Council level, in management, and legal control of, appropriate Assembly owned woodland.
- c) Whether some Assembly woodland could be placed under control of charitable trusts.
- d) Rigorous objective enumeration of how many forestry and timber related jobs actually relate to forests in Wales and the timber they produce. How can the contribution to rural development be maximised?

3) A competitive and integrated forest sector – innovative, skilled industries supplying renewable products from Wales. The Committee might explore:

- a) Reducing restocking costs on Assembly land:

- i) The likely competitive return on public investment in further rotations of coniferous forest.
- ii) Inviting the Wales Audit Office to examine the value and returns on restocking investment, compared with 'rewilding' approaches.
- iii) Whether greater use of continuous cover approaches would improve Welsh forestry finances by using natural regeneration and reducing the cost and overheads of intensive restocking.
- iv) The Committee might evaluate the balance between; investment in future coniferous timber to support processing jobs, a generation in the future; and the cost of public expenditure in the present.
- b) Reduced regulation of felling and restocking:
 - i) Do private owners, who are beneficially thinning commercial crops, need to be regulated by Felling Licences?
 - ii) Are Felling Licence restocking obligations over-prescriptive, could slower regeneration, to international standards of forest cover, be accepted?

4) Environmental quality – making a positive contribution to biodiversity, landscapes and heritage, and reducing other environmental pressures.

The Committee might explore:

- a) Plantation Forestry - The debate about whether exotic plantation forests fully deserve the title 'sustainable', and how they could be more so.
- b) Ancient Woodland Sites - It is twenty years since coniferous afforestation of ancient woodland sites was identified as ongoing habitat degradation (with each year of conifer growth), in need of remedy. The Committee might consider whether more assertive restoration is justified and can be achieved.
- c) "Rewilding"
 - i) Could more biodiverse forests be created by felling of existing conifer forests, generating income for the Welsh finances, followed by inexpensive informal natural regeneration? Is this a win-win?
 - ii) Should a major existing conifer forest be designated for this rewilding?
- d) Could greater use of continuous cover approaches reduce the sometimes deleterious effect of clearfelling in Welsh landscapes?
- e) Could use of pesticides (especially insecticides) be reduced or ended, as in other countries.

5) What are the challenges and opportunities that arise from leaving the European Union?

- a) Reform or reduction in agricultural subsidies may result in managed retreat from less viable agricultural land. This may result in development of naturally regenerating woodland, contributing to woodland creation targets, without public expenditure. The Committee might consider whether regulation of Good Agricultural and Environmental Condition could be relaxed, to remove the perverse effect of farmers being grant aided to plant trees in one location, and required to destroy scrub regeneration in a neighbouring one.

Alec Dauncey
7 April 2017.

Agenda Item 5.1

Committee Chair
Climate Change, Environment and Rural Affairs Committee
National Assembly for Wales
Pierhead Street
Cardiff
CF99 1NA

14 April 2017

Dear CCERA Committee Chair,

INQUIRY INTO THE MANAGEMENT OF MARINE PROTECTED AREAS IN WALES

I thank the Committee again for the opportunity to give evidence to this inquiry on 5 April.

I watched the webcast of NRW's 5 April evidence session to the Committee the following day. After having made a determined and conscientious effort to provide completely honest and truthful responses to the Committee's questions, I was surprised and upset by several disingenuous and dissembling assertions by NRW, which risk seriously misleading the Committee.

I e-mailed the researchers and clerking service identifying these issues and asked that they be brought to the Committee's attention. Your Committee Clerk, Marc Jones, advised that I write directly and formally to the Chair, via his hand since a new appointment has not been made at the time of writing, so that my concerns may be placed on the record.

1) Skomer Marine Conservation Zone.

NRW provided the Committee with a unjustifiably positive and potentially very misleading impression of its commitment to the management and monitoring of Skomer MCZ.

Mr Evans appeared to speak highly of the MCZ's monitoring outputs, implicitly complementing NRW for this work and giving no cause to doubt that it will continue. However:

- Since NRW was created in 2013, the MCZ monitoring programme has continued from that developed during its 24 years as an MNR under CCW's jurisdiction, in spite of NRW's reluctance to continue to maintain either the MCZ's monitoring or management. This reluctance, and a lack of commitment to maintaining the MCZ's management by both NRW and Welsh Government, is demonstrated in the attached correspondence between WG, NRW and the Skomer MCZ Advisory Committee Chair, summarized below.

pp 1-2: letter WG to NRW CX, June 2014, expressing WG "expectation" that NRW will continue to "maintain an effective management regime" once the MNR becomes an MCZ. However, this letter was written by a middle-ranking official, leaving its status uncertain, and it is not expressed as an instruction or formal delegation of responsibility.

pp 3-4: e-mail from Skomer MCZ Advisory Committee chairman Robin Crump (RGC) to NRW Chief Executive, April 2016 (p4), expressing concern about the future of the MCZ's monitoring and management (concern had been stimulated by rumours reaching the

Advisory Committee that NRW was attempting to distance itself from these functions); resultant response from Michael Evans to RGC (p.3) on behalf of the CX (this is the same Mr Evans that appeared in front of the Committee), clearly stating that NRW's statutory responsibilities for these activities had ceased.

pp 5-6: e-mail RGC to the Cabinet Secretary, October 2016, raising the same concerns as raised with NRW, and drawing attention to Mr Evans' response with respect to NRW's claimed cessation of statutory duty for the MCZ.

p.7: Cabinet Secretary response to RGC, November 2016; this fails to acknowledge any role or responsibility for WG, but identifies that the responsibility lies with NRW. This implies either that the Cabinet Secretary (or official that drafted the response) is denying that overall responsibility for MCZ management falls to WG (Marine & Coastal Access Act s.116 (5)), or that she simply is unaware of it.

Further, on Tuesday 4 April 2017 the Skomer MNR Advisory Committee was read extracts from an e-mail to the MCZ manager by Mary Lewis (the day before her appearance in front of the MPA inquiry Committee) in which she confirmed, in response to a query from the Advisory Committee, NRW's understanding that its duties for MCZs are:

- "certain specific advisory powers and duties" – "if asked for" by WG
 - "required to monitor if asked by WG ... nothing specific to do otherwise"
 - "no direct management duty over and above advice functions"
- Mr Evans erroneously claimed that MCZ sea bed monitoring would not be possible without volunteers and letting contracts. Both of these assertions are not true; a large majority, possibly 90% or so, of MCZ monitoring is carried out cost-effectively in-house by the Skomer MCZ staff.
 - He also misleadingly and mistakenly conflated MCZ monitoring with unrelated Skomer Island bird monitoring.

It appears clear that:

- The MPA inquiry committee members were provided with a very different impression of NRW's commitment to the Skomer MCZ at the hearing on 5 April than is detailed in this correspondence.
- Responsibility to manage and monitor Skomer MCZ lies with the Welsh Ministers (Marine & Coastal Access Act s.116 (5)).
- Neither WG nor NRW appear to want to accept responsibility for managing or monitoring the MCZ.
- WG has not directed or formally delegated responsibility to NRW to continue managing and monitoring Skomer MCZ.
- The future of 25 years successful management, monitoring, protection and biodiversity gain, and Skomer MCZ being an exemplar of good practice is at risk of loss because WG is failing to acknowledge its responsibilities or to ensure continuation of the MCZ's management.

These issues could be substantially addressed if WG were to delegate responsibility for Skomer MCZ to NRW, and clearly direct NRW to ensure continuation and appropriate resourcing of the MCZ's management and monitoring for the long term. I urge the Committee to include a recommendation to this end in its inquiry report so as to secure the future of the Skomer MCZ.

2) “Condition improvement project” and identified actions, priority actions and actions “under way”.

NRW referred to their in-house MPA “condition improvement project” which took outputs from an earlier EC LIFE-funded project. In describing these projects, NRW potentially misled the Committee members into understanding that these project outputs were entirely NRW’s work; they were not.

Whilst NRW’s representatives downplayed the importance and value of relevant authorities groups (RAGs) and local management during their witness session, they nevertheless failed to identify that the overwhelming majority of the information used to identify actions in the condition improvement project, and the actions and prioritised actions themselves, were derived from the work and outputs from RAGs and EMS Officers and the site management schemes they had developed.

The marine content of the CCW Actions Database was extensively populated with material from EMS action plans and this formed the basis of the information used in the LIFE N2K project’s *Prioritised Implementation* (PIPs) and *Thematic Action Plans* (TAPs).

It is regrettable that NRW did not acknowledge contribution of RAGs and management schemes, or the very substantial work EMS officers (including myself) carried out for about two years supporting development of PIPs and TAPs, or the disagreements on actions prioritisation between EMS officers and local NRW staff with considerable practical and local knowledge on one hand, and the LIFE N2K project team on the other. Some of these disagreements remained unresolved, but the LIFE team’s decisions were taken forward in spite of local knowledge and expertise.

NRW claimed about 70 priority actions were “under way”, implying that they were being carried forward by NRW. In reality, many of these appear to refer to actions being carried forward by RAGs under their management schemes.

Whilst it is rewarding that this work has been carried forward, it is unacceptable that its local, RAG and EMSO, sources are unacknowledged, and that it has been cherry-picked and misrepresented as only NRW’s work.

3) Management priorities.

NRW suggested that local management was a side-show compared to regulatory processes (such as environmental and Habitats Regulations Assessments, and marine licensing) and all-Wales management actions. This is not the case.

Whilst regulation and all-Wales actions are, of course, important, so too is the management of existing local pressures, particularly those arising fishing, water quality and port activities for example. For the most part, it is these local, existing and historical, pressures that are responsible for the currently degraded condition of MPAs and which need to be addressed.

Regulation also broadly differs from day to day management in that it is focused on potential future pressures and threats arising from developments and future licensable activities (*ie* falling under Habitats Directive Article 6.3) whereas *management* is focused on mitigating or eliminating pressures and threats arising from existing, ongoing activities (Article 6.2), many of which have long timelines and are well established. Implying Article 6.3 type regulation is a primary means of delivering Article 6.2 requirements is disingenuous. Regulatory processes are essential to prevent or minimise additional legacy pressure and damage, but they will not necessarily address long-term and ongoing legacy issues.

4) Legislative jurisdiction.

NRW did not distinguish where responsibilities for delivery of management measures lie. Whilst there were a few references to partners and to Welsh Government, the answers to the Committee mostly referred to “We”, *ie* NRW, in the context of delivery, implying that NRW has the primary role and the powers and jurisdiction to deliver many / most management measures even though they do not, as was finally, though ambiguously, admitted in the closing moments of the session. NRW particularly failed to make clear the breadth of management responsibilities that fall to Welsh Ministers.

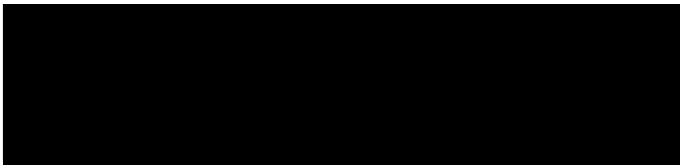
5) Assertion that the MPA Management Steering Group (MSG) has developed “network objectives”.

This is not true. I have spoken to three members of the MSG since the NRW witness session. None was aware of this alleged development and none were able to identify what the assertion may be referring to, although they may have been able to if NRW had explained what they meant by the term “network objectives”.

I would be pleased to expand on or further explain any of the foregoing points on request.

Should this letter be placed on the public record, I would be grateful if my personal contact details (address, e-mail, phone number) were redacted.

Yours sincerely,

A large black rectangular box redacting the signature of Blaise Bullimore.

Blaise Bullimore



Dr Emyr Roberts
Chief Executive
Natural Resources Wales
Ty Cambria
29 Newport Road
Cardiff
CF24 0TP
(via e-mail)

10 June 2014

Dear Emyr,

Re: Skomer Marine Conservation Zone

I am writing to provide a short update on the process to change the designation of the Skomer Marine Nature Reserve into a Marine Conservation Zone.

As you will be aware, the Welsh Government will commence Part 5 of the Marine and Coastal Access Act 2009 (the Marine Act) later this year (Autumn 2014). A direct consequence of commencing this legislation is that the area known as Skomer Marine Nature Reserve and managed by Natural Resources Wales will become Wales' first Marine Conservation Zone.

The reason for this change is that Part 5 of the Marine Act introduces a new mechanism for protecting marine biodiversity through the designation of Marine Conservation Zones. This new mechanism replaces the Marine Nature Reserve powers under the Wildlife and Countryside Act 1981.

The Welsh Government is committed to ensuring that there is no change to the level of protection afforded to the area as a result of this change. The transitional provisions within the Marine Act secure this commitment by providing that the existing conservation byelaw remains in force as if it is a conservation order under the Marine Act. There are currently no immediate plans to review the two byelaws of the former South Wales Sea Fisheries Committee which relate to fishing within the Skomer Marine Nature Reserve. This work is being taken forward on a thematic basis, as part of our Sustainable Fisheries Project, with the aim of removing, consolidating or updating the legislation on a priority basis.

To deliver the commitment on the ground and ensure that there is no change in the level of protection to the area it is the Welsh Government's expectation that Natural

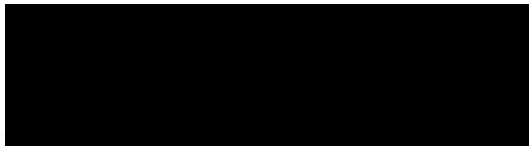
Marine and Fisheries Division
Llys-y-Ddraig
Penllergaer Business Park
Swansea SA4 9NX
Tel: [REDACTED]

Resources Wales will continue to maintain an effective management regime for the area as a Marine Conservation Zone.

I am also pleased to confirm that, in partnership with Natural Resources Wales, we have successfully established the Marine Protected Area Management Steering Group, which met for the first time on 3 June 2014. This group will consider the recommendations of the MPA Management Review and identify ways to improve the management all our marine protected areas in Wales. The arrangements at Skomer will inform part of this work. In the meantime my team will continue to work with your teams within Natural Resources Wales to ensure that the transition to a Marine Conservation Zone is a success.

I hope to provide a further update on progress, including a legislation timetable, at the end of the summer.

Yours sincerely

A large black rectangular box redacting the signature of Stuart Evans.

Stuart Evans
Acting Head of Marine Conservation & Biodiversity
Marine and Fisheries Division

CC:
Ceri Davies, Executive Director for Knowledge, Strategy and Planning
Rhian Jardine, Head of Sustainable Communities

From: Evans, Michael
Sent: 18 April 2016 15:18
To: [REDACTED]
Cc: Carl.Sargeant@assemblywales; Roberts, Emyr
Subject: Long term monitoring in Skomer MCZ

Dear Dr Crump

Thank you for your correspondence to our Chief Executive on the above subject. He has asked to me to respond to you on his behalf.

Like all public sector organisations in Wales we are facing significant cuts in government funding over the next few years. We are having to find ways of delivering our organisational duties with less money, and this means taking tough decisions about what we do and don't do in future, as well as seeking opportunities to work more effectively with others.

It is with these challenges in mind that we have commissioned our monitoring review. The review is tasked with making sure we are set up to deliver an affordable programme of data and evidence collection in future that meets our statutory and core business needs, including our new duty to manage Wales' natural resources.

I know the review team is mindful of the longstanding monitoring and management work we do at Skomer, much of which dates back prior to the site being designated as a Marine Nature Reserve. With the introduction of the Marine and Coastal Access Act and the transition to a Marine Conservation Zone, however, our statutory responsibilities to undertake these activities have now ceased. As you'll know we gave a commitment when the relevant part of the legislation was commenced in December 2014 that we would continue with our current management arrangements at Skomer in the short-term. This was to allow Welsh Government to undertake its review of management arrangements for all Marine Protected Areas in Wales.

With the pressures on our funding, however, we are now having to review all of our non-statutory monitoring programmes and this includes the monitoring we carry out at Skomer. We are committed to delivering this year's programme as planned, but are not yet in a position to confirm if the programme will continue unchanged in the longer-term. We will of course discuss the issue fully with Welsh Government and your Committee before making any final decision. Whatever the decision taken for MCZ monitoring, we will continue our monitoring at Skomer to deliver our statutory programmes for the Pembrokeshire Marine SAC and the Water Framework Directive.

Appreciating that we are unlikely to be resourced to carry out the level of monitoring we currently undertake in future years, we are keen to explore with our partners how the ensuing gaps in our evidence collection might be filled by those with an interest in doing so. We would welcome further discussions with your committee to advise us in such matters.

Yours

From: Robin [REDACTED]
Sent: 08 April 2016 10:59
To: Roberts, Emyr [REDACTED]

Cc: Carl.Sargeant@assemblywales

Subject: Long term monitoring in Skomer MCZ

Dear Dr Roberts

In my capacity as the Chairman of the Skomer Marine Conservation Zone (formerly Marine Nature Reserve) Advisory Committee I have been asked to write to NRW senior managers and Welsh Government to voice the Committee's concerns regarding NRW's review of monitoring.

At the last meeting of the Committee members voiced their fears that reduction of resources for the MCZ would have a profound impact on the Skomer MCZ's own monitoring programme and its ability to continue to contribute to wider SAC (and indeed Water Framework) monitoring work.

The Committee is well aware of the wide range of long-term monitoring projects that NRW's team at the MCZ carry out and how, by the use of volunteers and by making most efficient use of time in the field, these projects are achieved on a very modest budget.

We are reminded with each report that the MCZ produces, that the work they do is well respected and called upon by many of the UK's environmental agencies to provide case studies to guide policy. This is becoming more important as authorities in Wales, and in the UK as a whole, wrestle with the demands of managing existing MPAs and those coming on stream as a result of the Marine and Coastal Access Act and Marine Strategy Directive.

It is also important to note that NRW's Skomer team do not just carry out monitoring. The MCZ's budget also covers all the other aspects of MCZ management, such as site safeguard, public outreach, interpretation, and liaison with a wide range of recreational, commercial and academic interests. Committee members are well aware of this through many years of association with the MCZ (and MNR before it), but would like to be sure that those carrying out the review are fully aware of it. I would like to be able to reassure committee members before the next Skomer meeting on Tuesday 19th April.

Yours sincerely ,

Robin Crump ,B.A., Ph.D

(Chairman Skomer MCZ Advisory Committee)

Michael Evans

Pennaeth Tystiolaeth, Gwybodaeth a Chyngor/Head of Evidence, Knowledge and Advice
Cyfoeth Naturiol Cymru / Natural Resources Wales

Siaradwr Cymraeg

Ffôn/Tel: [REDACTED]

Ffôn symudol / Mobile: [REDACTED]

E-bost/E-mail: [REDACTED]

Ein diben yw sicrhau bod adnoddau naturiol Cymru yn cael eu cynnal, eu gwella a'u defnyddio yn gynaliadwy, yn awr ac yn y dyfodol

From: [REDACTED]
Subject: F [REDACTED] vation Zone
Date: 7 January 2017 16:21:07 GMT
To: [REDACTED]

Sent from [Mail](#) for Windows 10

From: [Robin](#)
Sent: 18 October 2016 22:51
To: Correspondence.Lesley.Griffiths@gov.wales
Subject: Skomer Marine Conservation Zone

Dear Minister

I am writing on behalf of the Skomer Marine Conservation Zone Advisory Committee in my capacity as the group's chair. The Committee is made up of around 30 members representing a range of marine interests including academic, recreational and commercial fishing and tourist operators, as well as government agencies and non-government organisations.

The committee began life in the 1970s as the Skomer Marine Reserve Committee when the area became a voluntary Marine Reserve and has continued to provide a stakeholder forum for, and advice to, the statutory nature conservation bodies throughout the evolution from voluntary reserve through statutory Marine Nature Reserve status (designated in 1990) and now to Marine Conservation Zone (designation in 2014).

Over this long period the Committee has seen many changes in fortune for the site and its staff, but concern and uncertainty over the future for Skomer MCZ has now reached the point where Committee members have tasked me to contact you directly.

Natural Resources Wales currently manage all aspects of the site (not including the Skomer Island National Nature Reserve, which is managed separately) via a small team based at Martins Haven. This includes not just the biological monitoring (which also informs reporting on the surrounding European Marine Site and is referenced in the recently released State of Natural Resources Report), but also water quality, commercial and recreational use monitoring, visitor management, community outreach and interpretation.

The Committee took great comfort from Welsh Government's June 2014 letter to NRW regarding transition of the site from MNR to MCZ which stated "*The Welsh Government is committed to ensuring that there is no change to the level of protection afforded to the area as a result of this change.*" The letter went on to say "*To deliver the commitment on the ground and ensure that there is no change in the level of protection to the area it is the Welsh Government's expectation that Natural Resources Wales will continue to maintain an effective management regime for the area as a Marine Conservation Zone.*"

However, NRW has recently embarked upon a series of "business area reviews" apparently driven by austerity measures and looking to eliminate any functions, including monitoring, that are not statutory requirements. In an e-mail earlier this year from NRW I was informed that "*With the introduction of the Marine and Coastal Access Act and the transition to a Marine Conservation Zone, however, our statutory responsibilities to undertake these (longstanding monitoring and management work) activities have now ceased.*", including presumably NRW's support and recognition of the Advisory Committee.

As you can appreciate the Committee is very concerned that the highly valued (and internationally

recognised) long-term monitoring datasets established at Skomer, not to mention the management that has helped to protect and enhance the biodiversity and ecosystem services potential for the site, are under threat. Over the years the team at Skomer has also established important links within the local community, with commercial and recreational users of the site and with academic institutions around the world and to throw this investment away would appear totally illogical.

Also at risk is the collective experience and goodwill of the Advisory Committee, which has not even been offered representation at the Wales MPA management steering group.

The Committee is not ignoring the economic realities facing Welsh Government and NRW, but given the increasing need for evidence to satisfy reporting requirements (Marine Strategy Framework Directive reporting begins next year) and the difficulties in gathering that evidence that the State of Natural Resources Report identifies we question whether reducing Skomer MCZ to a “paper park” by removing its resources makes any sense at all. For the sheer volume of work carried out by such a small team I would refer you to their latest reports at <http://naturalresources.wales/conservation-biodiversity-and-wildlife/find-protected-areas-of-land-and-seas/skomer-marine-conservation-zone/?lang=en>, particularly the annual and project status reports. The Committee are well aware, through its annual meetings and NRW reports, how much the staff at Skomer MCZ have achieved on a very limited budget and how the experience and skills of the team have contributed to efficiency savings.

There are a couple of ironies operating here:

One is that the Marine and Coastal Access Act (under which, incidentally, Welsh Government have a duty to monitor Wales’ MCZs) and the introduction of MCZs to replace the “failing” MNR designation appears to be about to remove all the good work achieved under the MNR designation and not replace it with anything else.

The other is that NRW state on page 2 of the State of Natural Resources Report that “*Natural Resources Wales is an evidence based organisation. We seek to ensure that our strategy, decisions, operations and advice to Welsh Government and others are underpinned by sound and quality-assured evidence. We recognise that it is critically important to have a good understanding of our changing environment.*

We will realise this vision by:

- *Maintaining and developing the technical specialist skills of our staff;*
- *Securing our data and information;*
- *Having a well resourced proactive programme of evidence work...*“

The Skomer MCZ Advisory Committee would urge the minister to consider Skomer MCZ an essential element in the evidence gathering effort needed for all Wales MPAs and to reassure us that the Welsh Government will honour their pledge to maintain an effective management regime for the area as Wales’ only Marine Conservation Zone.

Yours faithfully,
Robin Crump, B.A.,Ph.D
Chair Skomer MCZ Advisory Committee.

[Redacted signature]

Lesley Griffiths AC/AM

Ysgrifennydd y Cabinet dros yr Amgylchedd a Materion Gwledig
Cabinet Secretary for Environment and Rural Affairs



Llywodraeth Cymru
Welsh Government

Ein cyf/Our ref: LG/06507/16

Robin Crump
Chair
Skomer MCZ Advisory Committee



2

November 2016

Dear Mr Crump

Thank you for your email of 18 October, regarding concerns raised by members of the Skomer Marine Conservation Zone Advisory Committee about the future of Skomer Marine Conservation Zone (MCZ).

I am aware Natural Resources Wales (NRW) has been undertaking a number of business area reviews to ensure it has the right structures and resources in place to effectively carry out its functions. Conducting and implementing these reviews is a matter for NRW.

I would like to assure you and your members I am committed to maintaining and enhancing the marine environment in Wales. This includes ensuring Wales contributes towards an ecologically coherent and well-managed network of Marine Protected Areas, and the seas around Skomer form a part of this network.

Regards
Lesley Griffiths

Lesley Griffiths AC/AM

Ysgrifennydd y Cabinet dros yr Amgylchedd a Materion Gwledig
Cabinet Secretary for Environment and Rural Affairs

Bae Caerdydd • Cardiff Bay
Caerdydd • Cardiff
CF99 1NA

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

Gohebiaeth.Lesley.Griffiths@llyw.cymru
Correspondence.Lesley.Griffiths@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.

Pack Page 54

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.