

Thank you for offering an opportunity to provide the CCERA with advice into its inquiry on how a proposed Public Goods Scheme could restore biodiversity. As we are aware from successive State of Nature Reports, the Living Planet Index and the Welsh Government's own SoNaRR report and Natural Resources Policy, Wales' natural world is, like the rest of the planet, in decline. We also know that:

- Agricultural policy and practice since WWII have driven most of nature's recent decline in Britain and Wales
- Modern agricultural practice is a very recent phenomenon; historically, humans lived within a wilder British landscape but systematic and deliberate exploitation, hunting and persecution eliminated Britain's apex species
- 20th century forestry policy has also driven a lot of nature's decline
- This is exacerbated by inappropriate development (e.g., on floodplains, coasts), road infrastructure, atmospheric pollution, mineral extraction and more recently human visitor pressure
- Habitat fragmentation and species isolation are accelerated by the adverse effects of climate change, making restorative action - nature recovery – even more urgent
- Humans already occupy and exploit Britain's and Wales' most favourable ecosystems, particularly floodplains, squeezing our impoverished wildlife to the margins where it subsists but where this is designated and celebrated as “jewels in the crown” (shifting baseline syndrome)
- SSSIs, NNRs, N2K sites and other reserve systems have worked as much as they are able to with inadequate funding and within this fragmented and subsisting ‘natural world’
- Site designation was never intended to be the entire solution to nature's decline; there was always supposed to have been more action than this in the ‘wider countryside’
- Action in the wider countryside has relied too heavily on the voluntary approach by farmers and landowners
- Enforcement of e.g., EIA (Agriculture) (Wales) Regulations 2017, Heather and Grass Burning (Wales) Regulations 2008, and others, is wholly inadequate
- Agri-environment schemes haven't achieved their objectives, are under-funded and miss their targets by relying on the voluntary approach
- We must reverse nature's decline and in Ian Boyd's words (DEFRA Chief Scientist, May 2018), we have just 30 years to achieve this.

In answer to the Inquiry questions:

I. How could the Welsh Government's proposed Public Goods scheme, set out in Brexit and Our Land, be applied to restore biodiversity?

- a. Agricultural occupancy and employment continues to shrink in Wales, which will reduce the area of actively farmed land. In turn, this presents opportunities for deliberate and by-default nature recovery.
- b. With this sort of background and EU departure creating so much uncertainty for the sector, land managers need to be given a clear idea of what is being asked for by the Public Goods Scheme. The answer is straightforward: deliver a lot more nature recovery in as many places as possible in the wider countryside; wherever possible in ways that complement and connect designated sites and other areas of high biodiversity and semi-natural habitat; “more, bigger, better and more joined up.” This approach needs to be designed in ways that help land managers to reduce overheads, to internalise all production costs (by reducing the risks of e.g., pollution, nutrient loss and biodiversity loss) and helping to align modern land management businesses to consumer demand.
- c. As well as the right Scheme components, nature recovery requires empowering land managers through knowledge transfer, so that they can identify and develop collaborative schemes that deliver “more, bigger, better and more joined up.” It also requires access to the right advice from Local Nature Partnerships (LNPs) and the sector needs to be assisted to grow its own pool of ecological and nature recovery advisors. This could be provided through mentoring by LNP stakeholders during a post-EU departure transition phase, using some Scheme funding to incentivise the LNP stakeholders and land management businesses to collaborate; and through new advisors emerging from further and higher education modules, part-funded by the Scheme and kick-started during the transition phase. Targeting some of the Public Goods Scheme budget this way will help to accelerate innovative and creative thinking and collaboration by the sector and by LNP stakeholders; it will generate better ideas grown from the ‘bottom up’ and it might reduce the pressure for the PG Scheme itself to ‘come up with all the answers’ so to speak. In turn, this might help to prime the sector to be more receptive to the idea of contracts funded through loans (Sections 2,1 and 2,2 of the Agriculture Bill 2018) as well as grants and contracts.
- d. The Economic Resilience Scheme and the Public Goods Scheme must relate closely to each other. A higher, minimum environmental standard should be set first under the ER Scheme so that this provides a springboard to the PG Scheme. The higher environmental baseline should be established through basic measures that nudge and assist land management businesses to operate above the new Regulatory Floor that protects the environmental baseline. This will establish a new social contract between land managers and the paying public. It will also provide reassurance to land management businesses that they are able to meet public demand for higher environmental and welfare standards because the Regulatory Floor achieves this alignment for them.

- e. But this must be accompanied by a real and sustained WG programme to create local supply chains within the ER Scheme so that land managers have the confidence that increased efficiencies and added value here will find a local market, the same market that demands higher environmental output under the PG Scheme and low- and zero-carbon products under the ER Scheme.
- f. Use the PG Scheme to widen participation in ecologically restorative land management, e.g., encourage competition and new entrants who want to focus solely on Public Goods.
- g. During Scheme design, triage where emphasis should be given first in terms of achieving most nature recovery, e.g., floodplains and wetlands (these are the most threatened ecosystems globally and provide the most important natural resource for human life – water), semi-natural woodlands, lowland (cultivated) and upland peatlands, and controlling and eliminating INNS (Invasive Non-Native Species). Develop a similar triage approach for Wales' inshore coastal waters and habitats.
- h. Scheme contracts should be guided by local Nature Recovery Action Plans and Local Nature Partnerships, so that the latter become integral to nature recovery through land management.

2. How could the various existing Welsh Government policies and legislation for biodiversity restoration be applied in the design and implementation of the proposed Public Goods scheme?

- a. Complement the WFG Act by extending the Equality Duty in Wales to give every resident and visitor the right to enjoy and expect to live in a healthy, vibrant and ecologically rich natural world.
- b. In Wales' National Park and Areas of Outstanding Natural Beauty, design the Scheme so that biodiversity in Wales' National Parks benefits explicitly and deliberately. For example, offer a "National Park Premium" for nature recovery projects within Scheme contracts, paid in return for a well-designed proposal that is validated by the LNP prior to approval by the WG.
- c. There is a skills deficit in Wales that puts the delivery of Sustainable Management of Natural Resources (SMNR) at risk. These principles are not widely understood but they ask decision-makers to think and act like ecologists. The solution to this deficit? Train more ecologists, particularly for the land management sector with regards to delivering the PG Scheme.
- d. Build a close working relationship between the development and delivery of the PG Scheme and the Wales Spatial Planning Framework, so that the organisations and individuals responsible for delivering initiatives and decisions under the one, complement and augment initiatives and decisions under the other.

3. What lessons can be learned from the Glastir Monitoring and Evaluation Programme (GMEP) to ensure effective monitoring and evaluation of schemes to support the restoration of biodiversity? How should the new Environment and Rural Affairs Monitoring and Modelling Programme (ERAMMP) be designed and implemented effectively for this purpose?

- a. The GMEP programme was designed in response to EU concerns that there was insufficient evidence that Tir Gofal delivered real benefits. Consequently, GMEP was not designed to assist local delivery of biodiversity conservation or nature recovery; it was not collaborative or educative in the broad sense. Its remit was very specific to Glastir and satisfying the European Commission. Whilst generic findings have been published, none of the data have been shared, to the detriment of Local Nature Partnerships. Retaining rather than sharing the data was inevitable in a programme that relied on the co-operation of private landowners. It is a major flaw, however. A private landowner doesn't 'own' the wildlife on their land; wildlife belongs to everyone and the public therefore has the right to know what's there (with natural restrictions for sensitive and vulnerable species). ERAMMP has a wider remit but is still modelled on a top-down, highly specialised, secretive approach. It will, therefore, remain at risk of short-termism owing to its expense and low likelihood of wide take-up by non-specialists; the latter is essential if nature recovery and SMNR principles are to be delivered effectively. Delivering SMNR and the ecosystem approach need to be understood by as wide a range of people as possible. To be of real use in the medium and long term, ERAMMP needs to be shaped and delivered so that it increases public understanding of, and direct participation in, science, especially science that measures the contribution of land management to public benefits and quality of life. ERAMMP needs therefore to include a strong citizen science component, with proper staffing and funding over a number of years.