



Rt Hon Mark Drakeford MS
Welsh Government
Tŷ Hywel
Cardiff Bay
CF99 1NA

17 January | 2022

CC: Minister for Climate Change, Julie James and Deputy Minister, Lee Waters

Dear First Minister,

Following COP 26, and in the build up to the delayed 15th COP of the Convention on Biological Diversity, we write to outline some areas for swift action by the Welsh Government in response to the nature and climate emergency. Time is running out to truly turn a corner on tackling nature's dramatic decline and to keep climate change to a level that humanity can equally and inclusively survive. Whilst the commitments secured at COP 26 are important, we know that they amount to nothing without meaningful action to follow. We have seen world class leadership already from your office, through the Welsh Government's review of new road schemes.

However, the scale and pace of action needed to address the nature crisis is not in place. With COP 15 taking place this year; it is vital that Wales leads the way with strong ambitions and legally binding targets for nature's recovery, including achieving a 'nature positive' Wales by halting and starting to reverse biodiversity loss by 2030.

Wales Environment Link (WEL) members have long championed the importance of tackling the climate and nature crises together, to maximise outcomes for climate, nature and people. Protecting and restoring nature – by addressing multiple drivers of nature loss – will help us adapt to climate change and it must happen in parallel to an urgent fossil fuel phase out and economy-wide emissions reductions. The [Senedd's declaration of a nature emergency](#) was a landmark moment for Wales, recognising the

parity needed between actions to tackle climate change and those taken to tackle biodiversity loss. At the same time, the [joint report](#) from IPBES and IPCC underlined that, to be successful, we must address these together.

We welcome the Welsh Government's promise to make climate and nature central to all its policies, and the commitments made in the Net Zero Wales Plan. However, WEL believes more needs to be done, and at a pace, to realise the ambitions and targets we have set to keep Wales within 1.5 degrees and reverse nature loss. To bring people with us on this journey, it is vital that the environmental sector is supported to continue education efforts in schools and communities across Wales. Similarly, we welcome the commitment to Zero Waste and the ambitions for the Circular Economy and investment in prevention efforts which moves us 'beyond recycling'.

This letter sets out some key areas we believe the Welsh Government's needs to swiftly implement in order to demonstrate that leadership.

- 1. Increase the scale and pace of investment to protect and restore peatland in line with the recommendations of the UK Committee on Climate Change (UKCCC).** Wales has 90,000 hectares of peatland, but a large proportion of this is in unfavourable condition. Although we welcome your pledge to restore 800-900 ha per annum, it would take over 100 years to restore all peatland in Wales at this pace. As peat is five times more effective at storing carbon than trees, we would like to see this recognised in an increase in scale and pace of restoration.
- 2. Support a UK ban on the use of peat for horticultural purposes and cease procurement as a matter of urgency, along with an immediate ban on burning upland peat.** Although Wales doesn't extract peat, we do use horticultural peat in volume bags and as a plant medium. According to the Horticultural Trades Association, in 2020 our UK usage amounted to 2.29 million cubic metres of peat for growing media. Welsh Government and public bodies in Wales can act now by stopping procuring peat-based composts.
- 3. Embed and fund climate, nature and public access objectives in farming policy and support schemes.** This is a once in a lifetime opportunity to ensure that National Minimum Standards and future farm payments tackle the climate and nature crisis, as well as increasing public access to nature. It's imperative that

the Sustainable Farming Scheme doesn't simply pay land managers to continue with business as usual but delivers on the Welsh Government's commitment to pay public money for public goods.

- 4. Recognise the importance of equal access to quality green space for public well-being in towns and in the countryside.** As we have recognised with all the more urgency during the pandemic, access to nature is crucial to wellbeing, as well as increasing people's learning about, and personal investment in, the nature we're all trying to save. Good quality access to nature is crucial in galvanising public interest and understanding about the environment, and provides inspiration for members of the public to take personal action. High quality green and blue spaces are equally crucial for our urban environments. Nature on our doorsteps is not only beneficial for biodiversity but also to mental health, wellbeing and inward investment which support the social justice agenda. We have a big opportunity to improve access to the countryside as part of the Welsh Sustainable Farming Scheme and National Minimum Standards for farming.
- 5. Ensure that our protected sites network is large enough and sufficiently well managed to protect climate-critical habitats and species, and carbon stored within them.** The Welsh Government's commitment to the emerging global target to protect 30% of land and sea for nature by 2030 is very welcome. But protection alone is not sufficient; there needs to be a commitment to appropriately manage both land and sea to enable nature to recover. We need urgent investment, and have welcomed new funding allocated to nature networks, but this is just the start of the resourcing needed to meet the scale of the challenge. The Welsh Government should also focus on opportunities to manage the public estate for nature, along with land brought into initiatives such as the Wales National Forest. Nature recovery will not be achieved solely through protected sites and the 30x30 target; action to improve ecosystem resilience is needed across the entirety of Wales's land and seas. We also need to see all wild places with some form of protection, to prevent them disappearing.
- 6. Increase protection of the marine environment and restore key habitats and species, as well as harnessing the sea's carbon-storing potential.** We need to

make marine wildlife a higher priority, and ensure ambitions for renewable energy development are delivered in harmony with nature, i.e. informed by cumulative impact assessments within a spatial development plan. Fishing practices that disturb the seabed – which is under-valued, both sequestering carbon and supporting marine life – must be better managed. Wales should also better recognize the importance of cetaceans, not only for their own sake, but also for their ecosystem regulating functions (as set out in this [IWC Resolution](#)).

- 7. Set ambitious, legally binding, long-term and interim targets for nature recovery, giving parity to efforts to tackle the nature and climate crisis.** As one of the most [nature-depleted countries in the world](#), Wales needs to lead the way on setting targets that will drive action and prevent another ‘Lost Decade’ for nature. Legislation for environmental governance and nature recovery targets must be a priority for the Senedd in 2022 to avoid Wales falling further behind other UK nations in terms of progress and ambition to safeguard and improve our natural environment.

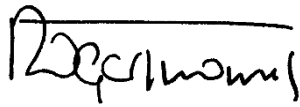
- 8. Get tree planting right – set ambitious targets for restoring habitats including a major expansion in tree canopy cover, in line with recommendations of the UKCCC.** To achieve this, and in delivering the National Forest, Wales needs more diversity in its forestry and timber economy, and to seize the opportunity to support agroforestry. More than half of new tree cover needs to be of native trees to maximise public goods, benefits for nature and long-term carbon storage. This must include further investment in our Celtic Rainforest; Wales’s Atlantic oak woods are globally significant. To ensure woodland creation delivers real benefit it must comply with the basic principle of the right tree, in the right place, for the right reason.

As organisations focused on the practical delivery of nature-based solutions to climate, we are keen to continue to work closely with Welsh Government and other partners. We wish to identify ways in which we can support accelerated and high-quality on-the-ground delivery of nature-based solutions; restoring and protecting green and wild spaces; and working together on initiatives like the National Forest.

The coming year is critical; COP 15 must set ambitious goals for nature while COP 27 will be vital in securing further commitments to strengthen the delivery of Nationally

Determined Contributions, and to close the gap to 1.5 degrees. As leaders in Wales, your commitment to acting for climate and nature now will be essential to inspire community led action, to the benefit all of society.

Yours sincerely,



Roger Thomas
Chair



Karen Whitfield
Joint Director



Susan Evans
Joint Director

Supported by all members of Wales Environment Link



Swyddfa Caerdydd
Tramshed Tech
Uned D, Stryd Pendyris Caerdydd CF11 6BH
F: 07498 228066 | E: enquiry@waleslink.org
Trydar: @WalesLink

Cardiff Office
Tramshed Tech
Unit D, Pendyris Street, Cardiff CF11 6BH
T: 07498 228066 | E: enquiry@waleslink.org
Twitter: @WalesLink

www.waleslink.org