



## Wales Environment Link views on the proposed FG Bill Goals

April 2014

**Wales Environment Link (WEL)** is a network of environmental, heritage and countryside Non-Governmental Organisations in Wales, most of whom have an all-Wales remit. WEL is officially designated the intermediary body between the government and the environmental NGO sector in Wales. Its vision is to increase the effectiveness of the environmental sector in its ability to protect and improve the environment through facilitating and articulating the voice of the sector.

### Demographics of WEL Working Groups

This document is supported by WEL members from 12 organisations, spanning an age range of 25 – 65 years. These contributors represent the views of their many thousands of members in Wales, who span all age ranges.

#### **a) Are these the right set of goals to secure a long-term sustainable future for Wales? You may like to amend or add others that you think are missing and should be considered.**

Our members welcome the ambition of Welsh government in attempting to legislate to embed SD as the central organising principle of all public bodies in Wales. However, we do not believe the current proposals are quite sufficient.

- The current goals give insufficient attention to environmental outcomes, particularly the quality of the environment, in regards to its biodiversity and ecosystem functioning.
- The goals and principles together do not adequately reflect a key objective of sustainable development i.e. living within environmental (or ecological) limits.
- There is a lack of clarity that public bodies should be concerned about impacts of their actions outside of Wales and seek to minimise any negative impacts.

Currently, the proposed goals do not sufficiently focus on the health and resilience of the environment, which underpins a healthy and economically sustainable society. This is fundamental to sustainable development and without this integration, the Bill is unlikely to be effective in its ambition.

The following views focus on the environmental goals. Our members recognise the importance of the social and economic goals, but at present feel that a single environmental goal is insufficient to achieve the aims of a sustainable Wales. We also feel that, if the goals are to be broad, aspirational goals, there needs to be clarity about what each of the goals encompasses.

WEL supports the following proposed goal (with a slight revision to the wording):

- Wales uses only its fair share of the world's resources

WEL also recommends the addition of the following goal:

- Wales has a resilient and biodiverse natural environment

WEL recommends that the concept of living within environmental limits should be incorporated within the FG Bill, either in the definition, as a principle or, if not, as a goal:

- The people of Wales live within environmental limits

WEL does not feel that the proposed goal that “People in Wales participate in our shared culture, with a thriving, living Welsh language” is explicit enough that the special places, landscapes, seascapes and heritage of Wales are part of this shared culture, and should be cherished and protected. Our members recognise the difficulty of composing the wording of such broad goals so as to encompass all these aspects without sounding cumbersome, which is why we recommend that clarity is provided on what the goals mean. If this clarity is not provided, we would suggest the following wording for this goal:

- The special places, landscapes, seascapes, heritage and culture of Wales are cherished and protected, and the Welsh language thrives in our communities

Our members believe that the long term goals for Wales should not be ordered in terms of importance. All the goals are of crucial importance to a sustainable Wales and public bodies should be required to make decisions which bring Wales closer to achieving all of the goals. We would suggest that all of the goals should be expressed as specific outcomes, rather than relative ones, i.e. ‘healthy’ not ‘healthier’.

With regard to the need for more focus on environmental goals and global impacts, another approach has been taken by Sweden. The Riksdag has adopted a generational goal, which is the overarching objective of environment policy and guides environmental action at every level of society. The goal is to pass on to the next generation a society in which the major environmental problems have been solved, without increasing environmental and health problems beyond Sweden’s borders. Policy instruments and measures to solve environmental problems in Sweden must be designed to ensure that Sweden does not export environmental problems.

## **1. Wales uses only its fair share of the World’s resources**

Without the sustainable use of natural resources, we may not be able to continue to provide the food and water we need to survive, or the raw materials we need to make the products that our economy relies on. Similarly, it is the over use of resources which threatens ecosystems globally. To achieve this goal, Wales has to take its share of global consumption and resource use into consideration, and public bodies and businesses will need to take the international impacts of their decisions, including procurement, into account, and not “export” either environmental or social problems.

## **2. Wales has a resilient, biodiverse natural environment**

Improving the health of Wales’ natural environment must be a key focus in future, because healthy, functioning ecosystems provide:

- species diversity and genetic diversity
- food and water security
- nutrient cycling
- climate regulation through carbon sequestration
- flood risk mitigation
- beautiful and inspiring settings for leisure, recreation, exercise and mental well-being

The natural environment provides the ecosystem services that wildlife and humans need to survive, so it is crucial that it does not continue to be degraded. Climate change adaptation measures to ensure resilience should be taken urgently to avoid irreversible damage on a global scale. Wales' natural environment and biodiversity cannot be covered by the goal on natural resources, which is global in nature, and focused on use rather than the conservation and restoration required to secure the healthy environment we need. We also believe that one of the requirements of a healthy natural environment is that our special landscapes and seascapes are cherished and protected from inappropriate development.

### **3. People in Wales live within environmental limits**

The Reference group set up to advise the Minister made a recommendation to him in February 2014 that "Environmental limits are an essential principle which should be considered within Sustainable Development (SD) decision making and living within environmental limits should be explicitly referred to in the Future Generations (FG) Bill."

The goals currently make no mention of this (and neither do the principles). We do not believe the goal of fair share alone will be sufficient to ensure attention to a problem relating to global systems. However, we would accept this concept as a principle, or as part of the definition of SD within the Bill, if not a goal.

Without stable global systems, such as climate, we cannot ensure the flourishing of humans or nature. For example, an unstable climate is increasing the frequency and magnitude of flooding and magnifying the effects of extreme weather, causing negative economic impacts, such as ruined crops and severe property damage. The planetary boundaries theory described by the Stockholm Resilience Centre suggests that there are nine environmental boundaries which, once exceeded, tip the Earth into a different system state, which may not return to current (favourable) conditions on a human timescale. For example, even if the climate stabilises at a global mean surface temperature no more than 2°C higher than the pre-industrial level (and this may now no longer be achievable), then this new climate may be incompatible with supporting many species, including the high human population of the planet.

Whilst human understanding of the exact nature of the functioning of global systems develops, it would be prudent for us to consider a goal related to developing our understanding of Wales' impact on these, monitoring and planning for change.

### **4. The special places, landscapes, seascapes, heritage and culture of Wales are cherished and protected, and the Welsh language thrives in our communities**

The special places, landscapes, seascapes, heritage and culture of Wales remain under constant threat. Our recognition and protection of their importance need to go further or they may not survive into the future. Neglect, combined with a lack of resources, understanding or interest at both a national and local level, has led to the deterioration of historic features and landscapes. At the other extreme, purposeful destruction of the king-pins of our national and local identities through insensitive development continues, often despite local protest.

The integration of those activities which seek to conserve Wales' natural and historic environment, and those systems which control and guide change, in particular the Town and

Country Planning system, are therefore critical. If a more sustainable approach to living is to be promoted in the future, there remains a compelling need to protect, not only our existing legacy of natural, historic and cultural assets, but a need to promote action which creates a new and equally rich “living heritage” of distinctive places, traditions, identities and local ways of doing things.

**b) What do these goals mean to you?**

**At present the proposed goals are high-level strategic goals. However how would these goals be translated into day-to-day activities, i.e. what key actions do you believe underpin these goals? If we successfully achieve them – what difference will you expect to see, i.e. what will success look like?**

The Millennium Development Goals (MDGs) illustrate how important measuring progress is to upholding commitments. Many of the commitments in the Millennium Declaration were not acted on, but those underpinned by global targets and indicators were pursued. Targets and indicators can play an important role in fostering collaborative action, informing and directing the flow of resources towards contexts and problems requiring attention. Without shared indicators, comparison and prioritisation would be reduced to guesswork.

The motivational power of the FG Bill in Wales will depend on whether it has clarity and simplicity. If the goals are very specific, then indicators alone may be sufficient to monitor and drive progress, so long as this results in appropriate policy changes if indicators show that Wales is not progressing in the right direction, or if there is no movement towards the achievement of a goal. If the goals are broad, then it may be necessary to set targets for some aspects of them, such as the achievement of 80% reduction in Greenhouse Gas emissions by 2050. If a clear framework is not set and understood, it will severely limit the Bill’s impact.

**1. Wales uses only its fair share of the World’s resources**

This goal must focus on reducing levels of consumption and waste. Key actions for public bodies will include:

- Sustainable travel planning
- Sustainable procurement policies (including food)
- Increase levels of re-use and recycling
- Reduce energy use
- Consider the land-use implications of operations
- Design products and services to use less materials

**2. People in Wales live within environmental limits**

This goal is different from the goal on natural resources, as this focuses on global systems. The actions at the level of individuals, public bodies and businesses would also focus on operational policies such as those recommended above. Our members hope that this goal would bolster the need for action on climate change, and provide a further imperative for organisations and individuals to reduce the Greenhouse Gas Emissions associated with their activities. This goal also requires land management which has positive impacts on biodiversity and on carbon sequestration.

Indicators of success would include, but not be limited to:

- reduction of Greenhouse Gas emissions by 80% by 2050
- a halt and reversal of biodiversity loss in Wales

- reduced phosphorous and nitrate loss via watercourses (resulting in fewer incidences of eutrophication)

### **3. A Wales with a resilient, biodiverse natural environment**

Action to reduce biodiversity loss requires action on a landscape scale, as well as at the local level, including:

- Ensuring the proposed area-based approach to managing natural resources includes biodiversity as a core consideration
- Completing the Welsh contribution to an ecologically coherent network of protected sites for representative habitats and species in the UK within the terrestrial and marine environment, and ensuring that these sites are well-managed
- Using Glastir to encourage wildlife-friendly farming
- Using the planning system to ensure developments do not destroy important habitats, landscapes and seascapes

Public bodies should consider the how they manage their land and whether improvements could be made which could improve conditions for wildlife, for example, the use of native trees and plants in hospital grounds and local parks, and local authority verge management for pollinators. Action for biodiversity does not have to be expensive, but the real value of the natural environment must be given the same level of consideration as other economic values if Welsh wildlife is to recover to healthy levels. This is especially important as it will also have many other social and economic benefits e.g. creating healthier places for people as well.

### **4. The special places, landscapes, seascapes, heritage and culture of Wales are cherished and protected, and the Welsh language thrives in our communities**

The Town and Country Planning System is key to the protection and enhancement of our special places, landscapes, seascapes and heritage. WEL supports the Independent Advisory Group recommendation to give the planning system the following statutory purpose: “The purpose of the town and country planning system is the regulation and management of the development and use of land in a way that contributes to the achievement of sustainable development.”

#### **c) What are the key measures of progress against these goals?**

**We would welcome views on the indicators, measures of success, and / or milestones that need to be linked to these goals. Public service organisations which will need to demonstrate compliance with the Bill will need to have clear measures of progress and reporting arrangements in place. Without these measures we are unable to track progress over the long-term period.**

Wales already has a set of sustainable development indicators, which measure economic, environmental and social indicators from GVA to child poverty, life expectancy and biodiversity loss. These are broadly sensible indicators, though the opportunity should be taken to ensure they are the most appropriate in all areas. Meaningful analysis of progress with them requires a steady accumulation of comparable data over the years. For some indicators it has not been possible to continue using comparable data sources, which makes it difficult to measure progress from the reference year. The traffic light system refers to improvement from a base year of 2003 for most of the current indicators, which masks year on year trends (although this is available in the more detailed section of the indicators report). Also, the most recent report appears to show that there is no recent information (from the last couple of years) for some of the indicators.

Many of the current indicators will be useful in measuring progress with the new goals, but there may also be a need for some new indicators. All indicators need to be appropriate and measurable using robust and comparable data sources in terms of annual progress. Progress reporting must feed in to Government policy and strategy so that indicators which show decline or little progress are used to focus attention on goals which are not being achieved. We have had SD indicators for some years but the Annual Reports on the SD scheme repeatedly mention that they have been ineffective in driving change. Indicators are a useful tool for measuring progress, but unless we have a framework which enables us to identify progress towards a goal, and to use this information to make appropriate policy changes to enable the achievement of that goal, this could become a tick-box data gathering exercise.

One of the main measures of success would be a reduction in consumption indicators, in particular Wales' Ecological Footprint. Once the Bill clarifies that Wales intends to monitor its impacts elsewhere and respond to changing scientific knowledge, then the indicators also will change as science develops.

**d) How can we make these into shared goals and what role do different sectors have to play in achieving these goals?**

**The key element of the national conversation is to hear from you about the long-term goals that we need to have in place now for our future generations. Shared goals and shared ownership of achieving them will be a significant part. Your views therefore on what your group, community or sector can contribute towards achieving them will be very important.**

The goals must be interpreted and actioned at a variety of levels, from national to local, which should be done in partnership with key stakeholders, including the third sector, communities and businesses as well as public bodies. It will be important for Welsh Government to support a well-resourced and vibrant NGO sector which would help to educate and involve the public utilising various areas of expertise through its work, activities, membership and volunteering programmes. Engagement and democracy is a key principle of sustainable development so it is essential that these are facilitated through the architecture of the Bill.

**e) Any other thoughts or comments you may have on the proposed long-term goals, and how we can look at the opportunities available to us in addressing these challenges?**

**Now is the time to share your thoughts on the mechanism / policies / governance that work or don't work in helping us achieving our long-term goals for Wales.**

The goals as they currently stand (and divorced from their legislative framework) do not seem to advance Wales much further than our current policy led approach. This is because it is not clear that sustainable development requires an integrated approach to pursuing these goals. It will be too easy for organisations to cherry pick and only address one or two of these.

Secondly, there is no mechanism and no clarity on determining conflict between the goals and changing the "business as usual" approach. The architecture of the Bill needs to include a duty and mechanism for this integration and management. Coupled with a lack of description and specification of the scale of change implied by these goals then they do not describe a changed society – a sustainable Wales.

It is clear that insufficient priority has been given in the past to ensuring that we have healthy functioning environmental systems that will support human life on Earth, and too little emphasis on ensuring we have enough resources for the needs of growing populations. We have given too little priority to the impacts of decisions on the environment, both in Wales and globally, and the consequences are beginning to impact on how we live. It is not clear from

these goals that there is any recognition of this growing imperative, both within Wales and globally.

The Reference group set up to advise the Minister recognised the need for greater priority for decisions impacting on the environment and restoring its damaged function. Therefore, it is essential that the interpretation of these goals and the need for considering the most sustainable outcome when making decisions, needs to be clarified in the legislation. We suggest that there should be some wording in the duty, or in an overall purpose clause that makes it clear that 'In optimising/ maximising their contribution to the goals, the pursuit of sustainable development (as defined in this Act), shall be the overriding objective when carrying out the Bodies' functions'.

WEL also suggests that a transition plan is in place by the end of the next Assembly term (i.e. 2020) identifying the major changes in approaches and practices that need to be put in place to achieve these goals, assessing the risks of no change, and identifying actions to be taken by public bodies and wider society.

### **The following WEL members support this document:**

**Amphibian and Reptile Conservation**

**Bat Conservation Trust**

**Buglife**

**Coed Cadw / Woodland Trust**

**Keep Wales Tidy**

**Llais y Goedwig**

**Marine Conservation Society**

**Plantlife Cymru**

**RSPB Cymru**

**WWF Cymru**

**Wye & Usk Foundation**

**Ymddiriedolaeth Genedlaethol / National Trust**