

Deputy First Minister and Cabinet Secretary for Climate Change and
Rural Affairs
Welsh Government
5th Floor
Tŷ Hywel
Cardiff Bay
CF99 1SN

24 September, 2024

Subject: Cuts to NRW workforce

Dear Mr Huw Irranca-Davies MS,

We are writing to express our deep concern at plans to cut over 260 jobs within Natural Resources Wales (NRW)¹.

Our primary concern is the impact of this loss on NRW's expertise in both biodiversity (especially specialist roles) and monitoring capability. The attrition of habitat and species monitoring has been long-term and undermines any attempt to get evidence-based information on whether any form of habitat and species management work is actually achieving its aims.

CIEEM is very sympathetic to the impacts of under-resourcing on the ability of regulators to discharge their functions, and we regularly cite this as a key factor behind persistent environmental harm, including in a recent response to the Climate Change Environment and Infrastructure Committee (CCEI)'s call for evidence on 'Halting and Reversing the loss of

¹ <https://www.bbc.co.uk/news/articles/c727p05p8dpo>

nature by 2030,' and in a letter to the IEPAW (re. Water Quality Report: Call for Evidence, 5th August 2024).

We have warned that inadequate and precarious resourcing will result in:

- loss of local and Wales-specific ecological knowledge, contacts and networks. This will be exacerbated by the proposed closure of NRW's library at Maes-y-Ffynnon;
- undermining of the ability of NRW to provide independent, evidence-based advice to the Welsh Government;
- disruption to standards and consistency of monitoring, which is especially important for monitoring long-term and complex changes;
- erosion of the ability of Natural Resource Wales to adequately check for compliance with permits;
- further limitation to NRW's ability to investigate pollution incidents and to undertake take enforcement action²; and,

² <https://www.itv.com/news/wales/2024-07-15/wales-environmental-regulator-is-missing-in-action-as-ex-employees-speak-out>

- long-term impacts on future ecological capacity in Wales: if younger generations do not have confidence that the sector will provide them with job security, they will not pursue a career in ecology.

While a refocusing of resources — i.e. reduction in bureaucracy and a refocus on key priorities — may be necessary, that exercise is much more likely to be successful without the drive to find £13 million of savings.

Wales has a good record of environmental legislation and policies, and we look forward to the forthcoming Environmental Principles and Biodiversity Bill. However, any loss of technical specialist biodiversity and ecological monitoring will adversely affect the capability of NRW and the Welsh Government to meet current and future commitments.

Yours sincerely,



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