

Evidence from: Kieran Thomas, Policy Officer, Chartered Institute of Ecology and Environmental Management.

Senedd Cymru | Welsh Parliament

Pwyllgor Newid Hinsawdd, yr Amgylchedd, Cynaliadwyedd a Materion Gwledig | Climate Change, Environment, Sustainability and Rural Affairs Committee

Blaenoriaethau Pwyllgor Newid Hinsawdd, yr Amgylchedd, Cynaliadwyedd a Materion Gwledig | Priorities for the Climate Change, Environment, Sustainability and Rural Affairs Committee

You do not need to answer every question, only those on which you wish to share information or have a view.

What do you consider to be the main priorities or issues that the Committee should consider during the Seventh Senedd, and why?

(We would be grateful if you could keep your answer to around 500 words).

The Chartered Institute of Ecology and Environmental Management (CIEEM), as the leading membership organisation supporting professional ecologists and environmental managers in the United Kingdom and Ireland, welcomes the opportunity to comment on this consultation.

Our priorities for this Senedd term were set out in our [pre-election manifesto](#).

What is your highest priority (Priority 1)

A Sustainable Farming Scheme (SFS) that delivers against the Sustainable Land Management Objectives (Agriculture Act (2023)), ensuring farm businesses are resilient against climate change and biodiversity decline and that the agricultural sector's contributions to addressing the climate and nature crisis are optimised.

Please explain why this should be a priority for the Committee (Priority 1)

(We would be grateful if you could keep your answer to around 500 words).

Issues

Wales is one of the most nature-depleted countries in the world¹, our per capita greenhouse gas emissions are far higher than the global average² and our landscapes increasingly suffer from more frequent and intense extreme weather events³. Farm businesses and the nation's food security face an existential threat in the form of the climate and nature emergency – we need look no further than this summer to see the devastating effects of wildfires and droughts, as highlighted by farming unions.

Through a combination of habitat loss, habitat degradation and pollution, agriculture is one of the main pressures on Welsh nature¹ and is our third largest greenhouse gas emitting sector². Moreover, with farmland accounting for 90% of Wales' land area, most of our environmental targets and ambitions are simply unachievable without contributions from the sector.

On the other hand, nature-friendly farming practices can restore nature and sequester carbon⁴ whilst simultaneously improving farm business profitability⁵, protecting farmland against the impacts of extreme weather and ecosystem collapse, and fostering more sustainable and reliable food production.

The SFS is the key delivery mechanism for realising the potential benefits listed above for our farmers and our environment – already, after one year, approximately half of Welsh farms are participating in the scheme. However, an SFS that does not deliver the sustainable management of natural resources is one that does not deliver for climate and nature, nor for farmers and their businesses now or in the future.

Asks

Fully realising the potential benefits listed above requires each layer of the SFS to deliver against the SLM objectives. We ask that the Committee continue to scrutinise both the evaluation and development of all parts of the Scheme with respect to its performance for farm businesses and the environment. In particular, we believe there is greater need for specific evaluation of the Scheme's contribution towards nature and climate targets, therefore we ask that the Committee assess the environmental impacts of the Scheme and, if possible, recommend potential contributions of the Scheme towards upcoming environmental targets or policies (e.g. the statutory biodiversity targets).

At the absolute minimum, the Universal Layer cannot be watered down any further with regards to environmental regulations, including as a result of the ongoing agricultural "red tape" review and any expansion of its remit (with respect to environmental regulations, we believe the term "green tape" is more appropriate, as these regulations serve a vital protection purpose for the

ecosystems that underpin healthy farms, not as an unnecessary bureaucratic barrier). Indeed, the Committee should ensure that a review of any part of the Scheme is conducted once sufficient time has passed to make a meaningful evaluation, not after less than a single year of operation, and that any such evaluation focuses on ensuring the delivery of the SLM objectives, not environmental deregulation.

The Optional and Collaborative Layers will likely make the largest contributions to farm resilience. It is vital that these layers are delivered with sufficient advice and resources (e.g. ensuring advisors have the requisite ecological knowledge – see CIEEM’s Farm Environment Advisor Competency Framework⁶). We welcome the recent announcement of multi-year funding for the Scheme but note that two-thirds of the allocation is for the Universal Layer. We understand the financial constraints under which the Government is operating, but we ask that the Committee press the Government to evaluate the performance of the Optional and Collaborative layers, including a review of their funding allocation, once these layers have been operational for a sufficient time. Again, we ask the Committee to press the Government for details regarding the intended contributions of these layers to wider environment targets.

We are also asking the Committee to evaluate any elements of geographic targeting of the Optional and Collaborative layers to ensure they work effectively to deliver landscape-scale nature recovery, climate mitigation and farm business resilience⁷.

We appreciate that some members of the Committee have been sceptical about aspects of the SFS in the past and their instincts are deregulatory with respect to agriculture. We are not calling for any extra burden on farmers. Instead, we are highlighting that Welsh agricultural practices are currently, largely, incompatible with the long-term sustainability of farm businesses and ecosystems and the delivery of the country’s statutory climate and nature targets. We urge the Committee to use its expertise and passion for the farming sector to push the Government to deliver actions to ensure the sector survives and thrives into the future.

What is your second highest priority (Priority 2)

Improving climate change literacy and planning across government departments to ensure the necessary actions are taken to develop climate resilience across society at the appropriate scale.

Please explain why this should be a priority for the Committee (Priority 2)

(We would be grateful if you could keep your answer to around 500 words).

Issues

Climate change impacts every area of society and the remits of every Government department. The examples below offer a snapshot of the breadth of climate change impacts and illustrate the pervasiveness, and often insidiousness, of these impacts:

- Economy: the UK's economic output could be affected by up to 7% of GDP by 2050 due to the effects of climate change⁸. This summer's heatwaves alone have cost the UK billions of pounds in lost output⁹.
- National security: various impacts through contributions to ecosystem collapse.¹⁰
- Food security and farm businesses: this summer saw the worst harvests on record for many farmers across the UK¹¹, impacting on farmers' mental health and the welfare of their stock¹².
- Health: manifold effects from the direct consequences of weather¹³, to increased pollution, poorer sleep, psychological stress¹⁴.
- Housing: housing stock unsuitable for increased temperatures, more communities at risk of flooding, more homes at risk from coastal erosion⁷.
- Infrastructure: various impacts including road and railway flooding, railway heat buckling⁷.

Asks

The Government's concern about climate change must extend well beyond meeting climate change targets (although these are important mechanisms for driving action, and the Committee should closely monitor Government progress towards meeting these commitments). Instead, the impacts of climate change can only be meaningfully addressed by governmental and societal action reflective of the diversity and urgency of the impacts, as highlighted above. Consequently, the Committee's scrutiny must be similarly broad, encompassing ministerial portfolios and policies across all government departments and relevant public bodies. The Committee must ensure these parties are aware of and planning for the impacts of climate change in their areas of work.

The Welsh Government has already taken initial steps in this direction through the introduction of a white paper on Rural Proofing, which we hope will carefully examine the multifaceted impacts of climate change on rural life. The Committee should proceed in a similar manner by asking departments or public bodies to demonstrate an understanding of climate impacts on their area of work, such as through the production (or updating) of climate change impact assessments and, where necessary, the Committee should ask these parties to produce mitigation and adaptation plans. For example, the Institute of Civil Engineers has recently produced a report on the economics of climate adaptation for the UK's infrastructure, recommending that the UK Government commission a review of the economic value of climate

adaptation in relevant sectors¹⁵. We suggest similar assessments for Welsh Government departments and public bodies. Examples may include, but are not limited to:

- The development of the National Food Strategy.
- Seeking an updated Climate Change Health Impact Assessment from the NHS¹⁶ and working with their Environmental Public Health teams.
- Scrutinising the work of the Deputy Minister for Public and Preventative Health with regard to climate change health impacts.
- Scrutinising the work of the Cabinet Minister for Local Government, Housing and Planning to ensure spatial planning and built environment policy is developed for a drastically changed climate (see our response to the relevant Committee).

We believe the Committee's work in this area will improve climate literacy among policymakers across Wales, helping create innovative and holistic approaches to meeting the demands of a changing climate in Wales and securing a safer and more sustainable future for all citizens. This work will only be possible with the availability and accessibility of expert advice, particularly to parties for whom climate change mitigation is a novel area of work. Professional bodies, such as CIEEM, can support the Committee's work in this area. Furthermore, the Committee should ask the Government to consider broad sectoral representation on their Climate and Nature Board.

What is your third priority (Priority 3)

Reviewing policies affecting water quality and quantity (i.e. availability, scarcity and excess), with a particular focus on planning for how these are affected by climate change and ensuring Wales' water systems and policies are climate resilient.

Please explain why this should be a priority for the Committee (Priority 3)

(We would be grateful if you could keep your answer to around 500 words).

Issues

Water quality and quantity are simultaneously affected by biodiversity decline and climate change, contributors to these issues, and foundational to addressing both.

Multiple sources of pollution have resulted in only 40% of Wales' water bodies currently achieving good status¹⁷. Consequently, freshwater species abundances have been declining for decades – this is a particular problem in catchments associated with intensive agriculture.

In terms of water quantity, this summer has been confronting, with the challenges of a changing climate thrown into sharp focus: the country has dealt with severe droughts, affecting farm businesses in particular, as well as wildfires at an unprecedented frequency and scale. At the other extreme, flooding is predicted to become an increasing problem across Wales, with tens of thousands of more properties at risk by the end of the century¹⁸.

Conversely, improving water quality can reverse at least some of the associated biodiversity declines, and a water system able to effectively store and manage water can guard against droughts, wildfires¹⁹ and flooding.

Asks

The issues facing the water system in Wales are complex and manifold. This year's water reform green paper provided a significant foundation upon which to develop future policy in Wales. We support many of the Future Generations Commissioner's views regarding the paper, including on agricultural pollution, a focus on environmental resilience, and the use of nature-based solutions in water reform.

We welcome the new Government's commitment to water reform, including their plans to introduce new targets on water pollution based on the 'polluter pays' principle. We anticipate the Committee's ongoing monitoring of the introduction and enforcement of these targets. We recommend a review of monitoring programmes to consider their extension to emerging threats, such as the PFAS trifluoroacetic acid.

In line with our second priority, it is critical that Wales' water system is resilient to climate change, as well as being responsive to shifts in population and land-use change. Gaps in water policy and inadequate information sharing between parties with disparate responsibilities can undermine these demands. For example, policy gaps between NRW and local authorities have resulted in the approval of planning applications without due regard to water availability for homes or the impact of development on local water quality. The Committee should bring together all parties currently responsible for separate elements of water and planning policy – including water companies, NRW, the department for Local Government, Housing and Planning, and local authorities' representatives – to address these policy and evidence gaps.

For example, the water reform green paper proposed a National System Planning function to coordinate water planning across Wales. We urge the Committee to press the new Government to take action to this end, including by extending the proposed integration of Water Resource Management Plans, Drainage and Wastewater Management Plans, River Basin Management

Plans and drought planning, to also include spatial planning policies associated with housing, commercial and infrastructure development. A National System Planning function is too good of an opportunity to waste by excluding certain parties or plans - the Committee should work with the Government to coordinate the development of a comprehensive, sustainable plan. The development of this plan must involve the input of ecological advice to embed the use of nature-based solutions within the water system.

Are there any other comments you would like to make about the Committee's priorities, its future work programme, or how it carries out its work?

(We would be grateful if you could keep your answer to around 500 words).

Anything else?

(We would be grateful if you could keep your answer to around 500 words).

1. Smith, A., Boswell, J., Halliwell, E., Birch, T., Bradfer-Lawrence, T., Burns, F., Hughes, J., Johnstone, I., Mancini, F., Mordue, S., Oates, J., Pescott, O. L., Phillips, A., Simkin, J. & Stanbury, A. J. 2023. *State of Nature Wales/Sefyllfa Natur Cymru*. The State of Nature Partnership. Available at: www.stateofnature.org.uk

2. Senedd Research (2026). *Cars, cows and coal: Welsh emissions from 1990 to 2024*. Senedd Cymru. Available at: <https://research.senedd.wales/research-articles/cars-cows-and-coal-welsh-emissions-from-1990-to-2024/>

3. Kendon, M., Doherty, A., Hollis, D., Carlisle, E., Packman, S., Rayner, N., Berthou, S., Barker, L., Turner, S., Hannaford, J., Jevrejeva, S., Matthews, A., Williams, J., Marshall, A. & Sparks, T. (2026) State of the UK Climate in 2025. *International Journal of Climatology*, 46 (S1), e70470.

4. Welsh Government (2024) *Sustainable Farming Scheme: Carbon Sequestration Evidence Review Panel: summary report*. Welsh Government. Available at: <https://www.gov.wales/sustainable-farming-scheme-carbon-sequestration-evidence-review-panel-summary-report.html>

5. Clark, C., Scanlon, B. & Hart, K. (2023) *Farming at the Sweet Spot: How farming with nature can make you happier, healthier, and wealthier*. Nature-friendly Farming Network. Available at: <https://www.nffn.org.uk/resources/nffn-the-sweet-spot>
6. CIEEM (2021). *Farm Environment Advice*. CIEEM. Available at: <https://cieem.net/i-am/current-projects/farm-environment-advice/>
7. Wales Environment Link (2025). *The case for Landscape Habitat Packages in the SFS*. Wales Environment Link Available at: <https://waleslink.org/sustainable-farming-scheme-a-framework-for-advice-and-landscape-habitat-packages-proposal/>
8. Climate Change Committee. (2025). *Progress in adapting to climate change: 2025 report to Parliament*. - Available at: <https://www.theccc.org.uk/publication/progress-in-adapting-to-climate-change-2025/#post-51607-endnote-53>
9. Stewart, H. (2026) *UK heatwaves may have cost economy £4.4bn in lost output so far this year, analysis finds*. The Guardian. Available at: <https://www.theguardian.com/business/2026/aug/12/heatwaves-uk-cost-economy-lost-output-thinktank>
10. Defra (2026). *National security assessment on global ecosystems*. Gov.UK. Available at: <https://www.gov.uk/government/publications/nature-security-assessment-on-global-biodiversity-loss-ecosystem-collapse-and-national-security/national-security-assessment-on-global-ecosystems-accessible-version>
11. Lancaster, T. (2026) *UK harvest on track for historic lows after drought and heatwaves desiccate crops – new analysis*. ECIU. Available at: <https://eciu.net/media/press-releases/uk-harvest-on-track-for-historic-lows-after-drought-and-heatwaves-desiccate-crops-new-analysis>
12. Davies, A. (2026) *How effect of climate change is 'mentally destroying' farmers*. Channel 4 News. Available at: <https://channel4news.substack.com/p/how-climate-change-is-mentally-destroying>
13. Roberts, M. & McGrath, M. (2026) *More than 2,700 people may have died in exceptional May and June heatwaves in England and Wales*. BBC. Available at: <https://www.bbc.co.uk/news/articles/czx5zy82n7no>
14. Sawyer, A. (2025) *How climate changes affects our health*. ECIU. Available at: <https://eciu.net/analysis/briefings/climate-impacts/climate-change-and-health>
15. Institute of Civil Engineers. (2026) *Making resilience count: the economic value of climate readiness*. Institute of Civil Engineers. Available at: <https://www.ice.org.uk/news-views-insights/policy-and-advocacy/policy-insights/policy-paper-economic-value-of-climate-readiness>
16. Edmonds, N. & Green, C. (2023). *Climate change in Wales: Health impact assessment*. PHW. Available at: <https://phw.nhs.wales/health-impact-assessments/climate-change-in-wales-health-impact-assessment/>
17. Natural Resources Wales (2025). *State of Natural Resources Report (SoNaRR 2025)*. NRW, Cardiff.
18. Natural Resources Wales (2025). *Flood risk management annual report 2024 to 2025*. NRW. Available at: <https://naturalresources.wales/evidence-and-data/research-and-reports/flooding-reports-evidence-and-data/flood-risk-management-annual-report-2024-to-2025/?lang=en>
19. Reeves, J., Thomas, K. & Webb, H. (2026) 'The Role of Ecologists in Wildfire Prevention with Harri Webb.' *Nature in a Nutshell* [podcast]. CIEEM. Available at: <https://cieem.net/i-am/nature-in-a-nutshell-podcast/>