

## Consultation response: National Milestones and Indicators

Date: Tuesday 26<sup>th</sup> October 2021

### Summary

Wales Environment Link, a network of environmental NGOs, has expertise in the environment but not for every area or question posted in this consultation. So, we have answered those with most relevance to nature and climate.

We think the National Milestones provide an excellent opportunity for us to see progress (or a lack of) in many areas of life, which can both help the Welsh Government in their policy making and for other bodies to see where more intervention might help turn Wales into the resilient nation we need.

We note the lack of a Milestone to measure biodiversity restoration. WEL members are involved in work on the national biodiversity indicator – Indicator 44 – and aware that Welsh Government has commissioned JNCC to work on a wider suite of biodiversity indicators for Wales. We were delighted to see the Welsh Government and Senedd recently commit to setting legally binding nature recovery targets. We advocate a framework for biodiversity akin to the climate change framework, as set out in the report ‘Putting Wales on a Path to Nature Recovery’<sup>1</sup>, and we are engaging with officials (both directly and as part of a number of stakeholder groups) on this agenda. In the second tranche of Milestone setting, we hope it will be possible to include a milestone for biodiversity (not as an alternative to, but to complement a bespoke framework of nature targets and associated duties). Alongside the greenhouse gas emissions milestone, this will reflect the importance of addressing the climate and nature emergency to achieving sustainable development in Wales.

### 1. National milestones

#### **Q3: Do you agree with the proposed national milestone for indicator No.21 Percentage of people in employment?**

In light of the past year and the ambitions for a green and just recovery for Wales, any measure of employment should account for the wider benefit created through the creation of green jobs. In order to achieve this, ideally the Milestone should measure the environmental impact of a job, as well as the economic – i.e. by ensuring that a job contributes to a net-zero, nature positive future.

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<sup>1</sup> RSPB Cymru, WWF Cymru & Wales Environment Link, 2020. Report: [Putting Wales on a Path to Nature Recovery](#).

Sectors that would contribute to the economic, environmental and social wellbeing of a future workforce and ensure a green and just transition include sustainable housing construction and energy efficiency retrofits; transport upgrades; energy; manufacturing; broadband infrastructure upgrades; climate-smart fisheries and aquaculture; as well as land, forestry and agriculture improvements. An [analysis<sup>2</sup> commissioned by Wales TUC](#) estimates that almost 60,000 jobs across these sectors could be created in Wales over the next two years. The report recommends 16 projects that would provide employment opportunities. These projects align with the [World Bank criteria](#) for long-term job creation, resilience and sustainability. Moreover, over 75% of these jobs would be created in sectors that traditionally don't employ graduate workers or provide entry level opportunities; creating employment opportunities for those who need them most.

Green jobs in nature restoration have a key role to play in ensuring a green and just transition. Natural Resources Wales' Green Recovery Delivery Partnership<sup>3</sup> – an outcome of the Green Recovery Task & Finish Group – has been working with 150 stakeholders across Wales to develop a proposal for a National Nature Service for Wales. A study by the RSPB<sup>4</sup> has estimated that a [National Nature Service could support almost 7,000 direct full-time equivalent jobs in Wales](#). Such a service, coupled with investment in nature restoration has the potential to provide jobs and skills, would create lasting employment opportunities, develop increased nature conservation expertise in Wales and provide the foundation for a successful shift towards a nature positive, low carbon future.

A National Nature Service (NNS) specifically, and employment provided in green jobs across sectors more generally, are key to ensuring a transition to a greener, fairer workforce. In order to enable and steer this transition, any measure of employment should therefore take into account the wider impact of job opportunities created, as well as the quality of the job created itself. Any measurement should acknowledge the central role of the workforce in ensuring the sustainability and wellbeing of Wales and, at a minimum, aim to encourage and account for the wider economic, environmental and social benefits of the job opportunities created.

Entry-level jobs that improve the environment and employment situation is a win-win, and should – as the Welsh Government aims to from their consultation paper – *“maximise the number of people able to participate in good quality, sustainable work”*. Wildlife and Countryside Link, our sister organisation in England, describes<sup>5</sup> the NNS as *“a smart way to build a more employable workforce fit for a green economy, to secure healthier and more cohesive communities and to deliver strong ecosystems - thereby saving money and saving lives.”*

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<sup>2</sup> Wales TUC, 2020. Press release: [Infrastructure investment could create 59,000 jobs and boost economic recovery](#).

<sup>3</sup> Natural Resources Wales, 2020. [Green recovery: supporting the environmental sector in Wales 2020](#).

<sup>4</sup> RSPB Cymru, 2020. [Developing a Green Workforce in Wales - Estimating the Scale of the Need and Opportunity](#).

<sup>5</sup> Wildlife & Countryside Link, 2020. Briefing: [National Nature Service Overview and Plan](#).

It may be complicated to measure 'sustainable jobs' as this would require some form of categorisation of industries, and it would be undoubtedly difficult to do for certain sectors. However, we hope the Welsh Government will be open to the concept and consider funding a pilot study, due to the numerous benefits to people and the environment that this could create.

**Q6: Do you agree with the proposed national milestone for indicator No.14 Ecological Footprint of Wales?**

This is a very important milestone, which we are glad to see included, and broadly agree with renaming it from the 'Ecological Footprint of Wales' to the 'Global Footprint of Wales', as this is semantically aligned with similar international measures and more accurately reflects the cross-cutting nature of the elements measured in it.

WWF have provided good examples of how to account for this accurately in their UK Global Footprint report<sup>6</sup>, with key areas that should be measured including agricultural and forestry commodities (ensuring progress towards zero deforestation and needless conversion of natural ecosystems); people's material consumption and biomass energy consumption. More specifically relevant to Welsh Ministers, WWF's latest report – 'Wales and Global Responsibility: Addressing Wales' Overseas Land Footprint'<sup>7</sup> – outlines the key areas that need to be measured in order to get an accurate picture of progress. The report illustrates the footprint of Welsh usage and imports, showing that *"an area equivalent to 40% of the size of Wales (823,000 hectares) was required overseas to grow Welsh imports of cocoa, palm oil, beef, leather, natural rubber, soy, timber, pulp and paper in an average year between 2011-2018."*

The specific areas we import from is important too, with *"30% of the land used to grow Welsh imports of commodities is in countries categorised high or very high risk for social and deforestation issues."* WWF has categorised countries a risk factor score and calls on Welsh Government to include this in the way it measures its global impact. It would also help to strengthen all public sector procurement and private sector's – via the Welsh Government's Economic Contract signatories – to commit to supply chains free from deforestation, ecosystem conversion and social exploitation. This should include supporting Welsh farmers – particularly as we transition into a new sustainable farming scheme – to eliminate imports of livestock feed that comes from similar unsustainable practices.

**Q7: Do you agree with adopting the existing Net-Zero greenhouse gas emissions target as a national milestone?**

Yes, it makes complete sense to include existing targets within the Milestone framework with this as Milestone 8. Although this is duplicating the requirement for them from the Environment Act,

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<sup>6</sup> WWF, 2021. [UK Global Footprint Report.](#)

<sup>7</sup> WWF Cymru, 2021. [Wales & Global Responsibility: Addressing Wales Overseas' Land Footprint.](#)

there is nothing wrong with having it set under two pieces of legislation. However, in terms of the dual 'climate and nature crises', this approach means we have two Milestones related to climate and consumption, but with none so far measuring progress on restoring nature. As stated before, we can tackle this in the second tranche, but it's important to highlight this.

A Net-Zero emissions target should ideally also include different kinds of emissions, including those that occur due to imported services or products. There is also the difficult-to-pinpoint Scope 3 emissions<sup>8</sup> - indirect emissions that occur in a company's value chain. This can include how employees commute to a place of work (and how they're expected to); waste disposal; use of sold products; transportation and distribution (up- and downstream); investments; leased assets and franchises. We appreciate that it is a challenging aspect to measure but countries have to learn how to approach this if we are to have a realistic chance of meeting targets set in the Paris Agreements.

**Q10: We are keen to gather evidence on the potential impacts and opportunities of achieving all the national milestones, and in particular, any dependencies between them. For example, there could be unintended consequences of making progress towards achieving a national milestone on another national milestone, or opportunities to deliver wider benefits between national milestones. Please use this space to provide evidence of these connections and interdependencies.**

We welcome the inclusion of Indicator 44, the status of biological diversity in Wales, as a second wave milestone. As noted in the consultation document, this is relevant to the wider suite of goals – indeed we suggest it is relevant to all the well-being goals, including those on health and equality which the table does not reflect.

In reflecting the importance of our response to the climate and nature emergency to the achievement of sustainable development, a biodiversity milestone will complement and assist with meeting milestone 8 (achieving net-zero greenhouse gas emissions by 2050).

The climate and nature emergencies we face are inextricably linked and require a joined up response. While climate change is one of the key pressures on nature, biodiverse natural habitats on both land and sea – such as woodlands, peatbogs, seagrass and saltmarsh – are significant stores of carbon and their protection, restoration and appropriate creation contribute to mitigating climate change. In addition, healthy natural habitats – i.e. nature based solutions – are critical to our adaptation to the changing climate, reducing the risk of flooding and helping prevent coastal erosion, for example, as well as maintaining healthy soils, clean water and the pollinators needed for our crops. In addition, access to nature improves people's health and wellbeing.

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<sup>8</sup> The Carbon Trust, 2021. Briefing: [What are Scope 3 emissions?](#)

## 2. National indicators

**Q11: Do you think an indicator on mode of travel should be added to the existing national indicator set? And are you aware of a data source(s) that could be used to measure this indicator?**

The proposal for a Wales National Travel Survey is very welcome and we think that, particularly as the Welsh Government is actively encouraging remote and home working, with co-working hubs being funded in certain areas, that this would be a valuable data source for modal shift. The Welsh Government is leading or supporting a great deal of excellent work on developing more sustainable transport systems, public transport and active travel. An indicator based on the connectivity of the resulting networks could also be particularly useful. How and when people commute has drastically changed in the last few years, and perhaps how far they commute and whether they are in a town or village area, as opposed to a city, would be of interest.

Sustrans may be able to help with collecting active travel data and it may also be productive to involve Welsh employers directly, so they can perhaps help with representative samples and asking their employees to fill in surveys. Businesses signed up to the Economic Contract could also be encouraged to provide ways for employees to travel more sustainably, perhaps with subsidised train passes, bike-to-work schemes encouraged or asking them to simply stagger meeting times so they employees can travel out of rush hour (therefore not contributing to traffic jams and idling cars as much).

### **Additional gaps to the national indicator set**

**Q14: We would also welcome your views on any further gaps you feel the COVID-19 pandemic may have highlighted in the way we measure progress towards our well-being goals?**

**If you would like to propose an additional indicator, please provide the following information:**

- **What is the name of the proposed indicator?**
- **What is the data source for this indicator?**
- **Please provide an explanation for why this indicator best measures the well-being of Wales**
- **Which well-being goals does the indicator directly impact on?**

As explained at the top of the document, we would like to see a Biodiversity Milestone in the second tranche, but there are also opportunities for habitat-related milestones. The Welsh Government's Minister for Climate Change recently confirmed their support for the 30x30 target i.e. aiming to protect 30% of our land and seas by 2030. Whilst a land-based set of indicators would take some developing, we already have a process for measuring Good Environmental Status<sup>9</sup> of our seas through the UK Marine Strategy, which could be adapted and better utilised.

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<sup>9</sup> UK Marine Monitoring and Assessment Strategy, 2021. [Summary of progress towards Good Environmental Status.](#)

Experts carry out monitoring and assessment work across the whole of the UK's seas to measure progress on the 11 Good Environmental Status indicators, giving us a good starting framework data set for marine habitat quality (although, monitoring efforts need to improve). If this data could be divided into the four UK nations' areas, then we could potentially develop a Milestone measuring our seas' health. If the data already exists, it would make sense to include and enhance it, and it would contribute well to achieving the Resilient Wales Wellbeing Goal. Our seas have huge potential for carbon capture and are often overlooked when it comes to tackling the nature and climate emergencies.

Wales Environment Link (WEL) is a network of environmental, countryside and heritage Non-Governmental Organisations in Wales. WEL is a respected intermediary body connecting the government and the environmental NGO sector. Our vision is a thriving Welsh environment for future generations.

This paper represents the consensus view of a group of WEL members working in this specialist area. Members may also produce information individually in order to raise more detailed issues that are important to their particular organisation.



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