Cyswllt Amgylchedd Cymru | Wales Environment Link

Blueprint Wales for PR24: Environmental Outcomes for the Price Review

August 2022

Introduction

This document sets out the recommendations for Wales which Wales Environment Link would like incorporated into water company plans for the Price Review 2024.

We are indebted to the Wildlife & Countryside Link (WCL) manifesto Blueprint for PR24 (aimed at English water companies) upon which this document is based. However, Wales is unique in the UK in having already enacted forward-thinking legislation, the Well-being of Future Generations Act (2016), which recognises the importance of a healthy environment to people's well-being as part of the sustainable development of Wales. We felt a Wales-focused response which reflects this was necessary.

Summary of actions

Welsh Government must:

- incorporate ecological resilience into decision-making, setting targets for ecological resilience through future Strategic Policy Statements to Ofwat (SPS) and the National Environment Programme (NEP);
- drive an ambitious water efficiency programme to reduce per capita consumption to 100 l/p/d or less by 2050, including funding a national campaign to influence consumer water-use behaviour;
- drive action to eliminate ecological harm from Combined Sewer Overflows (CSOs) by establishing ambitious interim targets and legislating to prevent persistent pollutants from entering our sewerage system;
- urgently agree the requirements for water companies to achieve Net Benefits for Biodiversity using the DECCA framework: delay in agreeing these requirements could lead to Welsh water companies working to two different

systems in cross-border locations, as England is using the Biodiversity Net Gain metric; and
- encourage and support partnership working across Wales with water companies, eNGOs and the agricultural sector to deliver water quality outcomes.

Regulators must:

- support the mainstreaming of catchment and nature-based solutions (C&NBS) through the NEP and PR24 methodologies, accepting these solutions when they deliver the greatest outcomes;
- encourage the use of multi-capital accounting methods, so that investment during PR24 delivers multiple benefits; and
- promote and enable water industry use of citizen science, embedding this in PR24 and NEP recommendations.

Water companies must:

- put the environment at the heart of decision-making as part of a sustainable development approach and invest in C&NBS;
- continue to develop a multi-capital approach to cost benefit assessments;
- reduce the amount of water taken from the environment, through adopting a long-term target of 100 l/p/d or less by 2050;
- ensure that Drainage and Wastewater Management Plans include a 2030 target for zero pollution incidents and plans to end discharges from the most environmentally harmful CSOs; and
- invest in engagement with local communities, developing catchment and nature-based solutions in partnership.

Delivering a Transformational Price Review

The state of our natural environment and our water sector is fundamentally interconnected. Yet our freshwater and coastal environment is fragmented, polluted and degraded, to the detriment of our communities, our economy, and our wildlife. Urgent action is needed to protect and enhance all of our freshwater and coastal systems and restore our designated sites network.

Proposals for the wider water environment need to be more ambitious with regards to biodiversity. The Well-being of Future Generations (Wales) Act 2015 and the Environment (Wales) Act 2016 have focussed attention on achieving ecosystem resilience through maintaining and enhancing biodiversity. This legislation encourages a more collaborative approach to enhancing the quality of the natural environment through techniques such as river restoration and improved catchment stewardship. Water companies, in adopting such an approach, can improve the resilience of their own operations to future stresses, securing a more reliable service for customers whilst reversing biodiversity declines in Wales.

In 2021, the Senedd declared a nature emergency and called for the establishment of legally binding nature recovery targets to reverse biodiversity loss, which will be set in future environmental governance legislation. We want water companies to look ahead to future Asset Management Plans (AMPs) and build in the flexibility to respond to these targets once they are agreed.

The Welsh Government has made clear its intention to set targets in line with the framework of global biodiversity targets to be set at the CBD COP15 summit and has already committed to protect at least 30% of land and sea for nature by 2030 ('30x30'). This target includes freshwater ecosystems, which is where water companies can make the most significant contribution. Attention is now focused on how this target will be delivered in Wales via a combination of protected areas and Other Effective Area-Based Conservation Measures (OECMs). Water companies will have a role to play in meeting this target, which requires that the 30% be effectively managed and in good or demonstrably recovering ecological condition. In doing so the water companies will be meeting their obligations under Wales' Section 6 biodiversity duty and also the Wildlife and Countryside Act's Section 28G SSSI duty, contributing to wider efforts to halt biodiversity loss and achieve a Nature Positive Wales by 2030.

The PR24 process offers a timely opportunity to give Welsh water companies a mandate to tackle these urgent issues by prioritising investment in biodiversity and restoring our designated sites network. The current Nature Recovery Action Plan for Wales identifies improving the condition of protected sites as an immediate priority, and a significant number of Wales's protected sites are within water company

estates. This should be in collaboration with key stakeholders whose experience with water companies and their management of landholdings, including SSSIs (Sites of Special Scientific Interest), will provide valuable insight to inform future biodiversity requirements.

Main Areas of Concern

Abstraction and water usage

- Despite the recommendations of the Review of Consents (2008), current abstraction levels in Wales are still not sustainable in every catchment and pose a significant threat to freshwater environments. Over-abstraction leads to a loss of freshwater habitats and associated species – world-wide, 90% of our wetland habitats have been lost in the last 200 years.[1]
- Future shortages: the UK's total water supply is forecast to drop 7% by 2045 due to climate change and increased demand.[2]
- Between the two Welsh water companies, 250 litres of water are leaked per property per day. This amounts to almost as much as each property consumes, totalling 267 litres per household per day.[3]
- Consumer perception of usage is wildly inaccurate – 46% of people surveyed in 2020 think their entire household uses less than 20 litres per day. The real figure is around 142 litres per person. [4]

Water quality

- Excessive discharging of raw sewage into waterways, with clear evidence that some CSOs are exceeding their legal limits.[5]
- The Welsh Government's Task Force on Sewer Overflows[6] has published an action plan with actions to set targets to reduce ecological damage from overflows, improve public data provision and reporting, and review planning, regulation and enforcement of overflows.

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[1] https://livingplanet.panda.org/en-gb/freshwater
[2] https://www.nao.org.uk/press-release/water-supply-and-demand-management/
3 https://discoverwater.co.uk/amount-we-use
[4] https://www.water.org.uk/news-item/vast-majority-of-brits-have-no-idea-how-much-water-they-use-each-day/
[5] Climate Change, Environment and Infrastructure Committee Report on Storm Overflows in Wales
[6] Environmental Regulation of Overflows: Action Plan

- Loss of biodiversity due to pollution: in Wales, salmonid populations are in serious decline in all rivers and formerly common species such as freshwater pearl mussel, white clawed crayfish and water vole are critically endangered.[7]
- Failure to meet standards; in Wales, only 40% of water bodies meet the standards for Good Ecological Status.[8]
- A 2021 review of phosphate concentrations in Welsh SAC (Special Area of Conservation) rivers showed that 61% of the 107 waterbodies assessed were failing on phosphate targets.[9]
- Danger to human health; the risk of bathers contracting illnesses such as E.coli or gastroenteritis are just as high in 2020 as they were in the 1990s.[10]
- Poor water quality has significant knock-on effects on tourism and recreation, damaging the economy. The economic value of freshwaters for the whole of the UK is estimated to be £39.5 billion.[11]
- Access to good quality green/blue space is vital for our physical and mental health, as emphasised by our experience through Covid19[12] Positive Action for Nature.

Investing in Catchment and Nature-based Solutions

We believe that by working together we have a unique opportunity to demonstrate how investing in C&NBS can bring huge benefits for both people and nature. We welcome the collaborative working approach laid out in the Ofwat document 'PR24 and beyond: A collaborative approach in Wales.'

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[7] SoNaRR 2020: Freshwater chapter

[8] https://naturalresources.wales/about-us/news-and-events/blog/rivers-under-the-spotlight/?lang=en

[9] Compliance Assessment of Welsh River SACs against Phosphorus Targets

[10] Leonard, A.F.C., Garside, R., Ukoumunne, O.C., and Gaze, W.H. (2020) A cross-sectional study on the prevalence of illness in coastal bathers compared to non-bathers in England and Wales: Findings from the Beach User Health Survey, Water Research, Vol.176, p.115700

[11] https://www.ons.gov.uk/economy/environmentalaccounts/bulletins/uknaturalcapital/landandhabitatecosystemaccounts#ecosystem-accounts-for-freshwater

[12] https://www.sciencedirect.com/science/article/abs/pii/S1438463917302699 and https://www.sciencedirect.com/science/article/pii/S0013935120310665?via%3Dihub#bib2

C&NBS, particularly in peatland and woodland, can provide multiple benefits for nature and society, including:

- restoring nature and habitat
- helping to halt and reverse biodiversity loss
- enhancing water storage and quality
- improving the condition of sites designated for water conservation
- improving climate resilience
- helping achieve net zero goals
- strengthening the economy
- creating green jobs

The following RSPB Reports, published in 2021, highlight the wider benefits and value of investing in Nature-based Solutions:

1. Nature-based Solutions in UK Adaption Policy (produced by Nature-based Solutions Initiative at the University of Oxford)
2. Economic benefits of nature-based climate solutions (produced by Cambridge Econometrics)

This latter study found that, in terms of economic and social benefits:

- for every £1 invested in restoring peatlands, the average expected quantified returns are estimated to be £4.62
- for every £1 spent on afforestation, the average expected quantified returns are estimated to be £2.79.

Land outside the designated sites network where C&NBS are being implemented, and resulting in positive biodiversity outcomes, has potential to contribute to the 30x30 target if it meets the criteria to be recognised as OECM (Other Effective Area-Based Conservation Measures). Water companies will have a role to play in achieving the Welsh Government's 30x30 target, and adopting clear Outcome Delivery Incentives on biodiversity would help to demonstrate that biodiversity is established as a secondary management objective in areas that may be managed primarily for water-related objectives. Coupled with evidence of positive biodiversity outcomes being achieved, this would strengthen the case for OECM recognition in such areas. However, to fully enable water companies to invest in C&NBS, the Welsh Government needs to develop a regulatory framework and permitting to support investment in these.

Statutory Duties

The Environment (Wales) Act 2016 promotes the Sustainable Management of Natural Resources (SMNR), which contributes to the well-being goals of the Well-being of Future Generations (Wales) Act 2015. The Environment (Wales) Act places a specific duty on public authorities, including water companies, to seek to maintain and enhance biodiversity and promote the resilience of ecosystems (the section 6 biodiversity duty). Section 22 of the Act gives Welsh Ministers the power to suspend statutory requirements for experimental schemes. This power is likely to be important in enabling trials of C&NBS. Section 28G of the Wildlife and Countryside Act places a specific duty on water companies to take reasonable steps to further the conservation and enhancement of SSSI features.

In its Programme for Government 2021-2026 Welsh Government has committed to:

- Build a stronger, greener economy as we make maximum progress towards decarbonisation.
- Embed our response to the climate and nature emergency in everything we do.

The Programme specifically lists the following Climate Change Commitments, which we consider relevant to the PR24 process:

- Deliver nature-based flood management in all major river catchments to expand wetland and woodland habitats.
- Legislate to strengthen the requirements for the use of sustainable drainage systems that provide wildlife habitat.
- Begin to designate Wales' inland waters for recreation, strengthening water quality monitoring.

These commitments are reflected in the Welsh Government's Strategic Policy Statement.

Natural Resources Wales (NRW) has a duty to apply the principles of SMNR in its work, which includes its contribution to creating the National Environment Programme (NEP) in Wales.

The Section 6 biodiversity duty applies to all land where water companies are operating. Where water companies' land ownership and operational impacts include

SSSIs and other protected areas it should be clear that the actions needed to further the conservation and enhancement of the SSSI will be paramount and should be a key route to delivering the wider Section 6 duty. These duties should be reflected in the NEP. To deliver on their obligations under Section 6, clear actions should be set out by water companies in their business plans to prioritise the further conservation and enhancement of SSSI's and other protected areas.

It is important that specific objectives, underpinned by Outcome Delivery Incentives (ODIs), are included in AMPs if water companies are to invest in them. To ensure future plans prioritise biodiversity, we strongly recommend that the NEP includes a clear requirement to improve the condition of the designated protected sites (e.g., SSSI, SAC and Special Protection Areas) on the water industry estate in Wales. Because baseline condition data for protected sites in Wales is incomplete, we recommend that this be framed as a requirement to secure all necessary management actions to meet the conservation objectives of protected sites, such that monitoring shows sites are in favourable or measurably improving condition.

This requirement should be accompanied by mandatory Biodiversity ODIs with measurable targets to drive improved performance in this area, based on the requirements suggested above. In the longer term we hope that better monitoring data will allow for the establishment of specific condition targets for SSSIs on water companies' estate.

Welsh Government and NRW have already committed to placing healthy, functioning ecosystems at the heart of what they do. It is their duty to press Ofwat and water companies to take actions which reflect this in all AMPs up to 2050.

Delivering a Transformational Price Review

A challenging, and yet transformational, Price Review presents an opportunity to ensure that through the next plan period (AMP8) the water sector makes the greatest possible contribution to Wales' environmental goals.

The following tables set out our recommendations in more detail.

Table 1: Establishing the ethos

Headline Actions	WEL Asks	Who Should Take Action?
Incorporate ecosystem resilience into decision-making	The National Environment Programme (NEP) should incorporate ecosystem resilience as a target which should then be added to the NEP recommendations in this and future AMPs. Adding ecosystem resilience as a legitimate outcome of resilience should be a key NEP driver to ensure companies develop and deliver schemes that protect and enhance the environment upon which their businesses depend.	NRW/ Ofwat/Welsh Government
Further develop and integrate a multi-capital approach to cost benefit assessments	Welsh water companies have already started to develop a multi-capital accounting approach. This should be further developed and clearly embedded into company accounting so that natural and social capital are appropriately considered in decision-making. Companies must build on the preparations of AMP6 and trials taking place in AMP7 and adopt an industry-wide approach to multi-capital accounting. This will ensure that variations in approaches do not result in poorer outcomes for the environment in different parts of Wales or compared with England.	Water Companies/ Ofwat
Invest in C&NBS that provide multiple benefits for nature, carbon and nutrients	An increased proportion of the industry's NEP annual investment should be used to deliver high-quality Catchment and Nature-based Solutions (C&NBS) which will deliver more for society and the environment than traditional approaches and will contribute to the achievement of the water industry's commitment to reach net zero carbon emissions by 2030.	Water Companies/ Ofwat

	C&NBS should be 'mainstreamed'. The NEP should include specific ambitious targets for the increased use of C&NBS. Water companies should endeavour to adopt C&NBS as standard and provide good evidence where such solutions cannot be incorporated. Regulators will need clear appraisal guidance to help them understand and accept the C&NBS options proposed by water companies and stakeholders. C&NBS should extend its scope by significantly increasing investment into the protection and enhancement of green and blue carbon stocks, including peatlands, grasslands, wetlands and reedbeds as part of a wider journey to net zero, effective nutrient management and restoring nature. C&NBS offers cost-effective opportunities to rapidly decarbonise alongside other more expensive technological solutions delivering multiple benefits in line with SMNR to meet net zero targets. However, this should not be seen as a way of offsetting emissions to avoid delivery of true, verified net zero through reducing carbon emissions. Companies' carbon accounting should factor in 'scope 3' carbon impacts (indirect emissions such as staff travel or purchased goods) which can be a large share of a business's carbon footprint.	
Increase weighting for schemes that follow the principles of SMNR and	The Options Appraisal processes for companies' Water Resources Management Plans (WRMP) and Drainage & Wastewater Management Plans (DWMP) should give increased weighting to schemes that follow the principles of SMNR and provide wider environmental	Water Companies/ Ofwat/NRW

provide wider environmental benefits	benefits by using the key opportunities identified in SoNaRR 2020. Business Plans must reflect this weighting to ensure that they prioritise schemes that reduce environmental and ecological impact.	
Establish clear biodiversity delivery objectives that will help to achieve the Section 6 biodiversity duty and section 28G SSSI duty	Require water companies to set out clear and measurable biodiversity objectives for the management of their estates and activities, in line with their statutory duties and with Welsh Government targets and policy objectives. These should include specific objectives relating to the management and condition of protected sites. Establish mandatory Biodiversity ODIs to drive progress in delivering biodiversity objectives and underline the clear mandate that water companies have in this area.	Ofwat/ NRW/ Water Companies
Publish Water Company Performance Reporting and EPA Review	Companies' Annual Performance Reporting and NRW's Environmental Performance Assessments (EPA) should include updates on the progress of environmental Key Performance Indicators / Performance Commitments, and information about environmental fines or penalties. We would expect new metrics to be added specifically for sewer overflows. Environmental headlines from these reports should be published annually on the Discover Water website, so that information is easily accessible to customers and stakeholders, and comparable across companies.	NRW / Water UK/ Water companies

Embed a safe and sustainable circular economy into water industry practice	A safe and sustainable circular economy should be embedded into water industry practice. Welsh Government's SPS sets expectations on Ofwat to encourage water companies to adopt circular economy practices. In addition to practices that reduce waste, specific actions that we would like to see are: • ensuring water company operations are not contributing to an increase in contaminants (e.g., persistent organic pollutants and microplastics) in the environment; • reviewing current sludge and bio-solids treatment practice and introducing thresholds for treated sewage sludge that reflect modern composition of wastewater, including for microplastics and PFAS, as a minimum; • setting a requirement for water companies to publish a road map which includes annual reduction targets, and addresses concerns around anti-microbial resistant bacteria; • requiring water companies to take a proactive approach to reducing contaminants entering the system by working together to fund projects which identify and implement interventions to stop pollutants at source.	Ofwat/ water companies

Water Use

Both water companies in Wales, in their PR24 pre-commencement consultation, have highlighted a shortfall in water supply in several catchments across the country. The next Price Review needs to move us further towards sustainable water use by taking actions that collectively reduce the amount of water we take from our environment.

Table 2 – Water Use

Headline actions	WEL Asks	Who should take action?
Reduce abstraction needs	It's vital to reduce the amount of water taken from the environment and put into supply (Distribution Input, DI), measured in absolute volumetric terms and as DI per head. Companies should set milestones (2030, 2040, 2050), linked to an aim to significantly reduce absolute DI by 2040. This should be met through a combination of reducing; • leakage (Ml/d) • domestic Per Capita Consumption (PCC, l/p/d) • non-household demand They should include AMP8 targets that set companies firmly on the path to helping government achieve longer-term goals. The industry should adopt a long-term target of reducing PCC to 100 l/p/d or less by 2050, (which an Energy Saving Trust report commissioned by Welsh Government shows is more than achievable in Wales[13]). The current 110 l/p/d planning assumption for that date was agreed to be appropriate in the absence of new positive government policy; the UK Government is now taking forward mandatory water labelling and will publish a roadmap to improve water efficiency in homes, making faster reductions viable. The Welsh Government should now set out how they will improve water efficiency in Wales.	Water Companies/ Ofwat/ Welsh Government/ NRW

[13] Water Labelling Options: Cost Benefits Analysis for Wales

Improve metering and consumer information provision to help customers save water	Smart meters are known to help customers understand and reduce their water use. Welsh Government should develop a strategy to encourage water meter uptake, including consideration of compulsory metering and how to support the introduction of combined utility meters so that customers better understand the links between water and energy usage. Every newly metered customer should have the option of a home water saving audit in AMP8. Water companies should provide straightforward, readily accessible information to customers on their water usage and benchmarks to aim for. Without this information it is harder to motivate customers to save water.	Welsh Government/ Water Companies/ Water Retailers
Legislative and other measures to reduce PCC to 100 l/p/d or less	Welsh Government should bring forward a programme of water efficiency work including; • directing water industry targets • introducing water labelling requirements, • requiring stricter efficiency standards for water efficient development in Planning Policy Wales	Welsh Government
Ensure sustainable abstraction levels that protect nature in our rivers	Water company abstraction levels must be sustainable and provide no threat to freshwater environments. We expect the Review of Consents to be fully implemented by 2025 and for regulators to work with water companies to ensure that all rivers in Wales protect a natural flow regime which supports designated species and habitats. Plans must also address predicted future deficits and abstraction needs.	NRW/Water Companies

Wastewater

Our current water treatment systems are struggling to cope with increasing pressure from extreme weather events and increased demand. Progress on tackling this is poor.

Only 40% of Wales's water bodies achieved good ecological status according to 2021 data. The Climate Change, Environment and Infrastructure Committee's 2022 report on storm overflows showed that water company Event and Duration Monitors recorded 105,751 spills in 2020.

Table 3: Wastewater Infrastructure

Headline actions	WEL Asks	Who should take action?
Publish real-time data to inform stakeholders and underpin investment decisions	The Industry must improve the monitoring methodology for Storm Overflows. This should include load and volume information and should see real-time data published (beyond just for bathing waters).	NRW/ Welsh Government/ Water Companies
Publicly publish and expand the Chemical Investigation Programme	Welsh Government should require the UK Water Industry Research body (UKWIR) to make data and outputs from the Chemical Investigation Programme publicly available. This programme should also be expanded to include emerging chemical pollutants.	Welsh Government / UKWIR
Improve classification and investment in sewage discharge infrastructure	Water companies must classify the condition of all Combined Sewer Overflows (CSOs) and make assessment information open and transparent as soon as data allows. No CSO in Wales should cause ecological harm by 2030. A programme of continuous investigation and improvement must be supported by funding which can allocate	Water Companies/ NRW/ Ofwat

	investment through contingent items, to enable works identified within AMP to be rectified within AMP.	
Decommission or ensure no harm from environmentally damaging CSOs	Integrate interim targets (anticipated in March 2023) to 'reduce harm' from CSOs by developing plans to decommission or ensure no ecological harm from all CSOs causing environmental harm. Plan to decommission or significantly reduce the spill rate from the most environmentally harmful CSOs in the next business plan (AMP8). 'Harm' should be defined by the environmental impact on receiving water bodies. Mainstream the use of C&NBS such as sustainable drainage schemes for reducing pressure upon CSOs and employ them wherever effective.	Water Companies / Welsh Government
Reduce impact from CSOs on recreational hotspots.	Business Plans must include the Bathing Water designation target from the Sewage (Inland Waters) Bill for recreational hotspots (i.e., at least two inland bathing water designations per water company per year) whilst ensuring that no Inland Bathing Water causes impact to designated sites. Impact of CSOs on human health in designated bathing water/recreational areas should also be given consideration when prioritising investment.	Water Companies
Business Plans to include Drainage and Wastewater	Include Drainage and Wastewater Management Plan (DWMP) priorities (covering all wastewater, not just CSOs) in PR24. Business	Water Companies

Management Plan priorities	Plans must reflect wastewater priorities coming out of the DWMP and NEP.	
Set targets for zero pollution incidents by 2030	All water companies to set a target for zero pollution incidents (categories 1, 2 and 3) by 2030. To support this, Welsh Government needs to bring forward legislation to control certain pollutants, preventing them from entering the sewage system, e.g. plastic wet wipes, pesticides and problem chemicals.	Water Companies/ Ofwat/ Welsh Government
Set wastewater targets on nitrate and phosphorus	Welsh Government should set wastewater targets on nitrate and phosphorus as part of an overall approach to the more sustainable management of wastewater. New clean water targets should go beyond existing Water Framework Directive requirements. Contributing metrics, in addition to nitrate and phosphate monitoring, could include; • the proportion of wastewater treated to tertiary standards • the area of habitat protected via first-time sewerage schemes or 're-routing' of water industry infrastructure.	Welsh Government/ NRW

Engaging Communities: Getting the Public 'On-Side'

Working with the public towards agreed benefits is ultimately less stressful for all concerned and has economic advantages.

Table 4: working with the public

Headline actions	WEL Asks	Who should take action?

Influence consumer behaviour	Fund a national campaign to change consumer water use behaviour and the way people dispose of items and chemicals down drains and toilets.	Welsh Government in partnership with others
Engage with local communities	Invest in quality engagement with local communities wherever Catchment and Nature-based Solutions are being considered. Schemes with community support are more resilient and the community often play a key role in ensuring their operational effectiveness.	Water Companies in partnership with local communities
Work with the agricultural sector to improve the water environment	The water sector can play a key role in supporting farmers who are compliant with regulation, but where pollution reduction requires them to go beyond regulatory baselines. The current approach can see farmers unable to invest, and the water sector unable to support them (e.g. through a payment for ecosystem services approach). Approaches should be developed to support collaborative work between sectors without violating the polluter-pays principle or placing unfair burdens of responsibility (for pollution from a different sector) on either sector.	NRW/ Welsh Government
Promote Water Industry use of Citizen Science by embedding in PR24 and NEP recommendations	The environment needs to be monitored appropriately. Welsh Government and NRW should create a national-scale framework for standardised citizen science approaches in Wales. These integrate local monitoring with other low-cost, high-density data into national decision support tools.	Ofwat/ NRW/ Welsh Government

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.

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