**Taking forward Wales’ sustainable management of natural resources**

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**About this consultation**

The consultation seeks views on new regulatory approaches to the sustainable management of natural resources in Wales. Proposals include:

* promotion of the circular economy
* nature-based solutions
* new markets and innovative mechanisms
* smarter regulation

**Question 1** ‒

**Towards the Sustainable Management of Natural Resources Promote a Circular Economy**

Do you consider there are further opportunities for integration of circular economic approaches? If so, please provide examples of where there are any regulatory obstacles to achieving integration.

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| Yes |  | No |  | Not sure |  |

Comments

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| Natural resources are resources that exist without actions of humankind, I exclude human resources, leisure activities and biodiversity from any definition as they are products that come from natural resources. But for the consideration of the circular economy concept a different classification is important.  Natural resources can be classed as either biodegradable or non-biodegradable resources and this distinction is important for the circular economy concept.  Minerals, rock or stone based products, metals and ores, soils and oils are examples of non-biodegradable resources/products.  Food, timber, thatching materials, aesthetic and aromatic products, medicinal products, fur, wool, fuel (wood or peat) and resins are all examples of biodegradable resources/products.  I exclude water from either definition as it is a good example of the circular economy concept, it does not decay but moves from one form to another and technically can be continuously reused (after treatment).  We can easily apply the circular economy concept to natural resources that do not naturally bio-degrade, we can use stone to build a house and then reuse the same stone to make another house, we can use steel and plastic to make a washing machine and then reuse all the component parts of the washing machine to make another washing machine.  With biodegradable resources we cannot apply the circular economy concept as the action of biodegrading prevents reusing the original item to recreate a new, similar item. You can use what is left after the biodegrading process for another use, fertiliser or woodfuel are examples but that is not the circular economy concept.  Biodegradable products have a linear pattern of use in that they are used and consumed and cannot be reused in their original form, thus there is a more fundamental restriction on applying the circular economy concept to biodegradable natural resources.  If you eat a carrot you can never use that carrot to actually create another carrot.  However this is actually a huge benefit to Wales as the continuous cycle of growth and decay means the impact is neutral and the process contributes to an economic cycle which in turn pays for many other benefits to society that should not be disadvantaged by the concept of a circular economy.  In essence the production of bio-degradable natural resources is a creative process not an exploitative one.  We could and should seek to reduce wastage of natural resources and this applies equally to bio-degradable and non-bio-degradable natural resources.  Using waste products from agriculture could have a viable use providing energy, for example farm slurry in anaerobic digesters but this is often prevented as transporting animal products between farms is often restricted for animal health reasons.  Woodland and forests are exemplar land uses in this regard as they do not create waste products, all parts of the tree can be used even though in some cases, for reasons of providing habitat or food sources or water management, we may not use them all. |

**Question 2** ‒

**Delivery of Nature Based Solutions**

Are there any regulatory barriers to introducing nature based solutions? Please provide information.

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| Yes |  | No |  | Not sure |  |

Comments

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| The complexity of regulation is a barrier, how the myriad of guidelines, strategies, best practice and legislation fit together is simply beyond the comprehension of the majority of people.  We need to KEEP IT SIMPLE.  Inevitably many simply choose which bits fit their cause and forget about the rest. Often the interpretation of individual pieces of legislation by individuals, NGO’s, regulator and governments is very narrow and is deliberately used to suit the aims, objectives and bias of themselves.  On many occasions even no response from consultees is taken as an objection to change and consultees can enforce their desires without doing anything.  All the guidelines, strategies, best practice and legislation should be brought together under the concept of sustainable management of natural resources but they are not. The concept requires cooperation and trade-offs but the legislation is not requiring this, only aspiring to it.  Cooperation requires two parties to come together and agree a common outcome, when one of the parties gets everything they want through not responding or collaborating then this is not cooperation in the sense the legislation is aspiring to.  The legislation should be amended to require cooperation by presupposing a lack of collaboration will be regarded as no input to the process and therefore no influence over the outcome. This would fulfil the need to ensure everyone takes part and does not simply sit back and achieve their narrow objectives by non-participation. |

**Question 3** ‒

**Support New Markets and Innovative Mechanisms**

Are there potential opportunities for market mechanisms or innovative regulatory approaches? Are there any legislative barriers to their implementation?

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| Yes |  | No |  | Not sure |  |

Comments

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| Payments for Ecosystem Service (PES) is the obvious approach that could be used. However we believe that PES first requires a regulatory base line that we regulate to, and which is enforced, and then pay for addition benefits above that baseline.  The real flaw in the PES concept is that in this new age of austerity we have less money to pay for anything, so we cannot see how a PES model will compete for funding alongside schools, hospitals and the many other demands on resources in the future.  To do so will require complex financial valuations of PES that will pass scrutiny by accountants, this is possible but will take many years to develop which is time we can ill afford.  We could use the **Providers** of Ecosystems Services approach where we recognise that many activities, in the normal course of what they do, will **Provide** the Ecosystem Services and use that information to assess the priorities and trade-offs needed to make things happen.  In effect this would be adding weighting to PES not values and using that weighting to inform which activities we should permit not prevent and is in line with the ecosystem approach as adopted by the UN Convention on Biological Diversity. |

**Question 4**

**Forestry**

Do you agree with proposals to align NRW’s general duties (including the balancing duty) under the Forestry Act with the sustainable management of natural resources?

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| Yes |  | No |  | Not sure |  |

Comments

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| The consultation notes that the duties and functions relating to forestry regulation and management set out in the Forestry Act (FA) were transferred to NRW in April 2013 and NRW’s general purpose is set out in Article 4 of the Natural Resources Body for Wales (Establishment Order) 2012. “In the exercise of its functions, it must pursue sustainable management of natural resources in relation to Wales, and apply the principles of sustainable management of natural resources”. Article 4 was subsequently amended by section 5 of the Environment (Wales) Act 2016 so we believe that NRW’s general duties already aligns with the sustainable management of natural resources.  Regarding forestry, the FA makes reference to “the maintenance of those trees in accordance with the **rules and practice of good forestry**”. UK Forestry Standard (UKFS) is the reference document used in the UK which defines good practice also acknowledged by the consultation. UKFS encompassed the concept of sustainable management long before any national legislation came into force. Our own Woodlands for Wales strategy is based on UKFS and so we believe the sustainable management of natural resources is already aligned with the forestry act and we see no reason why any change is needed.  Before any change to how the forestry act is interpreted we would require the exact wording that will be used and a more definitive description of what the outcomes would be, simply stating the above is meaningless.  The consultation also refers to “The “balancing duty has operated well to ensure that NRW achieves a reasonable balance between forestry and nature conservation”  We would argue that the balancing duty has not worked by NRW as both manager of the PFE and as regulator.  As manager of the WGWE, NRW is presiding over a drastic decline in the softwood availability over the coming years. By 2040 the softwood production from the WGWE is set to decline by nearly 50%. We are aware and understand the policies and drivers that NRW are implementing which contribute directly to that decline and we agree with many of those policies and drivers, however there needs to be other actions put in place, such as a more proactive woodland and forestry creation programme, in order for it to be described as balanced.  The simple fact that we have lost 18000ha of commercial conifer resource, not including some 200+ha NRW has taken out of production for windfarm development without compensating for it in any way (a specific requirement under UKFS) is evidence that it is not balanced.  As regulator, NRW shows little regard for balance, when interpreting legislation NRW appears to favour keeping the status quo and is reluctant to approve any woodland or forestry creation projects of scale that will result in land use change. Practitioners speak of “a fight to get permission to plant trees”. We have seen virtually no new woodland creation for commercial purposes and precious little for any purpose although recent GWC rounds are slowly starting to change this.  The Branching out report by the CC,E&RA committee recognised this as being a reality and called for it to be addressed.  On the NRW management of the WGWE we have no way of judging the performance of NRW. We have long called for greater clarity in the NRW accounts to include income generated and cost of production of timber so we can judge how effective NRW are in managing the WGWE.  NRW are audited to UKWAS, which presumes against the conversion of forestry area to non-forest land but does permit this in limited circumstances. It is not a requirement in UKWAS to protect the productive capacity of the forest, which is a requirement under UKFS and WFW strategy and the fact that the audit of the WGWE is not in line with the WG’s own WfW strategy should be investigated. |

**Question 5** ‒

Do you agree that NRW should be able to delegate its responsibilities for managing the Welsh Government Woodland Estate to others? Please indicate, whether you consider if there should be any limitations on NRW to delegate these functions.

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| Yes |  | No |  | Not sure |  |

Comments

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| We do not think NRW should be able to delegate its responsibilities for managing the Welsh Government Woodland Estate to others  Good forest management is a complicated process and is challenging even for trained, chartered foresters. Non-forestry trained individuals or organisations would not be suitably qualified to make the complex and difficult decisions needed to manage the forest.  The question gives no indication on who NRW might delegate this function to, so we cannot agree to move responsibility to individuals or organisations that could make forest management decisions based on the heart not the head which will often be to the detriment of the Welsh forests  Forest management needs to be done by professionals. UKFS requires that stakeholders are consulted and that their views are taken into account. So the process for input from anyone is already in place and by this method it is overseen by qualified and professional individuals making the balanced decisions needed.  The forest sector is working with NRW to enable a lighter touch regulation for qualified managers who have earned the recognition that they are performing forest management at a consistently high standard. This is aimed at reduce the burden of regulation on NRW who are already struggling under budgetary reductions to perform this role. Delegating responsibility to untrained parties will inevitably create more work and expense for NRW in monitoring and regulating their operations.  We see regulators in many sectors moving away from the hand holding model and moving to make greater use of profession managers. |

**Question 6** ‒

Do you agree that a long-term forest management plan agreed between a forest manger/owner and NRW could be an appropriate way to regulate and authorise the felling of trees?

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| Yes |  | No |  | Not sure |  |

Comments

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| Yes, Confor has already requested this of NRW and Confor members have been working with NRW and WG to create a template for a long term management plan. This concept has already been drafted and is now under trial so we are puzzled as to why it is now being consulted on.  The long term management plan concept is however reliant on professional forest managers that can implement a plan over a long time period. The success of any long term management plan can only be assured by the use of trained forest managers who will implement the plan as defined in the original contract with NRW. Using untrained parties for forest management creates a risk that they will step outside the original terms of the contract and NRW will have no method by which they can regulate that as their only direct involvement is at the plan approval stage. |

**Question 7** ‒

Do you agree that conditions in a conditional felling licence or long-term forest management plan should align with the sustainable management of natural resources?

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| Yes |  | No |  | Not sure |  |

Comments

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| A key requirement of the FA is that conditions should be the exception and not the rule and only be applied for the maintenance of those trees in accordance with the rules and practice of good forestry. UKFS is the current standard for sustainable forestry so any conditions should not, nor have any need to, go beyond UKFS compliance.  The sustainable management of natural resources is an ill-defined concept that is open to interpretation and that already causes huge difficulty for any regulator. Adding unnecessary complexity that could lead to mis-interpretation will not aid woodland or forestry management. Easy evaluation of the plan is a key requirement for regulator, manager and owner alike both in terms of implementing and monitoring the plan and the subsequent cost of both.  Adding conditions to felling licences or management plans that go beyond the owner’s objectives for that woodland or forest poses a huge risk that woodland management will cease. There is no compulsion on owners to implement any plan, owners in receipt of plans that contain conditions perceived as too onerous, costly or impede their own objectives will simply not execute the plan and woodlands will fall into decline as a result. |

**Question 8** ‒

Do you agree that NRW should be able to revoke or amend felling licences or forest management plan approvals? Please indicate if you foresee any difficulties amendment or revocation might cause.

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| Yes |  | No |  | Not sure |  |

Comments

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| We strongly oppose any moves to allow NRW to revoke felling licences or management plans. Giving NRW power to dictate to landowners what they will do and have the ability to amend or revoke legitimate aims and objectives of landowners without the owner’s consent is not acceptable under any reasonable democracy.  “Planning” means putting in place a scheme that has a predetermined outcome and forest planning is a long term business which requires the certainty a long term plan bestows on it. UKFS gives both NRW and other stakeholders the opportunity to input into the plan at the design and preparation stage and that must be the limit of any third party involvement.  NRW has a regulatory role not a dictatorial role. As with any regulatory body NRW have powers to ensure conformity with an agreed plan, regulators can enforce, but should never make, the rules.  Any modification of a felling licence or long term management plan part way through the life of the plan should be the sole preserve of the owner.  We support the idea that NRW can amend plans or felling licences but the only at the request of the owner or their representative.  NRW routinely amend the forest design plans for the WGWE and we have previously highlighted this as a serious issue. It is a conflict of interest for NRW to be both manager and regulator and we call, as we have done since the formation of NRW, for the two functions to be separate. |

**Question 9** ‒

Do you agree with the proposals relating to the repeal of the requirement of the RAC?

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| Yes |  | No |  | Not sure |  |

Comments

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| We not agree with the proposal to repeal the requirement that NRW maintain a Regional Advisory Committee (RAC) as we believe there is a very real need for NRW to be guided by independent advice on forestry matters. In addition we believe this requirement should even be expanded to require NRW to seek independent advice on forestry matters.  We believe it is a prudent responsibility for any organisation, especially a body charged with managing a very large and valuable public asset, to seek advice and not rely solely on their limited in house expertise.  As previously stated we also believe that there is a conflict of interest within NRW acting as both manager and regulator and we call for that to be resolved by separating the functions. Requiring NRW to seek independent advice, whilst not ideal, would go some way to resolving this issue.  The consultation document states “We consider that NRW’s general duty to promote the interests of forestry and the establishment and maintenance of adequate reserves of growing trees is as important today as it always has been”.  Therefore the need for NRW to be guided by good forestry advice and expertise is also as important today as ever was the case with predecessor bodies. NRW has less expertise available to it for forestry matters than was previously available to predecessor bodies due to staff losses so it is logical that NRW will need to obtain that advice from somewhere else.  NRW has presided over a catastrophic decline in the softwood availability predictions on the WGWE for the future and has thus far failed to maintain adequate reserves of growing trees. In our opinion, this point alone makes an overwhelming case for the requirement for NRW to be guided by independent advice on forestry matters to remain in place.  Independent advice on forestry matters we feel is still crucial, both to NRW and WG. The ideal body to do that is the Woodland Strategy Advisory Panel (WSAP), which already fulfils this, and the function of arbitration, to WG in cases of disputes with NRW as regulator (which WG is duty bound to do under the same responsibilities of the forestry commissioners. It is recognised by the CC,E&RA Branching out report that WSAP fulfils a vital role in providing advice and should be expanded so it is logical that WSAP is the body to provide NRW with independent advice.  WSAP is independent of NRW in its administration although some staff from NRW do sit on the panel.  Wales Land Management Forum (WLMF) has very little specialist forestry expertise within its membership which is overwhelmingly agriculture focused, so is incapable of dispensing specialist advice on forestry.  Providing advice to NRW on non-forestry land management is not a statutory duty. WLFM could do so, however even this function should be limited to advice on agriculture as there is no representation on WLMF for any environmental, community, recreational or industrial matters (representation of these sectors is included in WSAP). These sectors form a large part of the workload of the NRW portfolio and we are sure they would benefit from advice on. In addition the WLMF ToR may not be suitable for an advisory role to NRW on the wider remit within the NRW Establishment Order 2012.  WLMF is also not independent of NRW as it is chaired and staffed by NRW so we would advise that this is resolved in order for NRW to receive good independent advice. |

**Question 10** ‒

Do you agree with the proposals to improve the protection afforded to valued veteran and heritage trees by refining the existing statutory frameworks, principally the tree preservation order regime?

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| Yes |  | No |  | Not sure |  |

Comments

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| We would support “The exemption for trees that have become dangerous is limited to works that are required to the extent that they are urgently necessary to remove an immediate risk of serious harm” This could be strengthened by an obligation to notify a local planning authority of works undertaken in reliance on an exemption or exception and we believe there should be provision made for the submission of reasonable evidence to prove there was indeed an immediate risk. Technology is such that reasonable evidence should be easy to obtain and record. |

**Question 11** ‒

**Designated Landscapes**

Should the statutory purposes of AONB and National Parks be aligned with the sustainable management of natural resources?

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| Yes |  | No |  | Not sure |  |

Comments

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| Yes we believe that aligning the statutory purpose of AONB and National Parks should be aligned with the sustainable management of natural resources, this would widen the role and purpose of National Parks beyond the preserve and protect purpose they currently have. |

**Question 12** ‒

Where the special qualities of each designated area are identified, should this be given greater weight in decision making? In considering this, how should it be done in order to most effectively add value to the governance of those areas and the connection to local communities and businesses?

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| Yes |  | No |  | Not sure |  |

Comments

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**Question 13** ‒

Should legislation be introduced to recognise a wider range of areas and partnerships involved in driving the sustainable management of natural resources? What approach should be considered?

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| Yes |  | No |  | Not sure |  |

Comments

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**Question 14** ‒

Are there any other aspects of the Future Landscapes: Delivering for Wales report where you believe a legislative provision is necessary?[[1]](#footnote-1) If so, please explain which and why.

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| Yes |  | No |  | Not sure |  |

Comments

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**Question 15** ‒

**Access to Outdoors**

Will these proposals deliver consistency in the opportunities available for participation in different activities and provide effective safeguards for land management and the natural environment?

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Comments

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| We disagree with proposal 10 “To enable cycling and horse riding on footpaths to occur under the same conditions as those provided for cycling on bridleways under section 30 of the Countryside Act 1968”.  The consultation recognises that “There are circumstances where relying on responsible behaviour by users will not be sufficient to ensure land management, user and wildlife interests are protected. Under Part 1 of the CRoW Act restrictions to access can be imposed in special circumstances, namely, for reasons of land management; for nature conservation or heritage preservation purposes; to avoid the risk of fire; and to avoid danger to the public”.  Many footpaths are on private land and unfettered access by users other than on foot will impede the legitimate use of that land by the owner. Cycling and horse riding for example are much faster moving activities than walking. Ensuring public safety, which is a requirement of the land owner/user, becomes much more difficult if the activity happens much faster. Cyclists for example arrive at a specific place much quicker than a walker and if there are potentially hazardous activities taking place on that site (like planting or harvesting crops or recreational activities like cricket, football, paintballing, rallying or air sports like gliding) then the cyclist is at risk of serious injury. This would create much more work and cost to owners to comply with their legal responsibility to ensure public safety. Similarly horses could be startled by fast moving activities on site so there is a real need to restrict access to some potentially hazardous sites, especially for access that moves quicker than walking.  Enabling such access, without ensuring adequate measures are in place to restrict that access for legitimate reasons, could put in jeopardy the lawful use of private land and recreational sites. It could actually prevent many desirable activities and would not be in line with the wellbeing of future generations act.  Walkers are generally welcome in private woods where they do not disturb any current activity e.g. felling or sporting activity but public liability insurance is always a concern for private owners. Anything that increases the quantity or the extent of public access beyond what is currently permissible would push up the cost of public liability insurance for private, who, understandably, would be asking where the recompense for that is. |

**Question 16** ‒

Will these proposals deliver a more integrated and up to date system for identifying, designating and recording publically accessible areas?

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| Yes |  | No |  | Not sure |  |

Comments

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**Question 17** ‒

Will these proposals provide significant clarification to ensure that the public, land managers and others are clear about their rights, responsibilities and duties in relation to access to the outdoors?

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Comments

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**Question 18** ‒

**Marine and Fisheries**

**Marine**

Do you support the need for new powers to identify Welsh Regional marine plan regions and to produce marine plans for these Regions?

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| Yes |  | No |  | Not sure |  |

Comments

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**Question 19** ‒

Do you support Regional marine plans? If not, please indicate how you suggest local issues are addressed within the current framework and what specific impact do you think the proposals would have upon your interests?

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| Yes |  | No |  | Not sure |  |

Comments

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**Question 20** ‒

**Fisheries**

Do you agree with our proposals to manage fisheries flexibly? Can you provide any example where flexible management would be of benefit to your business?

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| Yes |  | No |  | Not sure |  |

Comments

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**Question 21** ‒

Do you agree with our proposals to introduce a fit for purpose licensing regime for aquaculture? Please consider whether there are any other functions you think the license should cover.

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| Yes |  | No |  | Not sure |  |

Comments

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**Question 22** ‒

Do you agree with our proposals to increase the scope of the current Buyers and Sellers Regime. Please consider what impact you think the proposals will have on your business.

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| Yes |  | No |  | Not sure |  |

Comments

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**Question 23** ‒

**Water**

**Abstraction Reform**

Do you agree with the approach we are proposing, to introduce abstraction reform on a Wales only basis?

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| Yes |  | No |  | Not sure |  |

Comments

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**Question 24** ‒

**Drainage Reform**

Do you agree with the proposals presented by the Welsh Government?

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Comments

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**Question 25** ‒

Do you believe there are additional proposals which could improve the current legislative/regulatory landscape in the short term?

Please consider if there are any other potential reforms required in Wales, which may need to be delivered in the longer term.

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Comments

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**Question 26** ‒

**Waste and Local Environment Quality**

**Waste – Powers of Entry**

Do you agree that Welsh Government should amend section 108 of the Environment Act 1995 so that:

* it removes the need for providing 7 days notice to the person in occupation of the premises;
* retains the need for a warrant;
* extends the description of information that can be required; and
* provides the ability to remove (and retain) material for examination, including information stored electronically?

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**Question 27** ‒

**Waste – Sanctions under Section 46 of the Environmental Protection Act 1990**

Do you agree that the Welsh Government should amend section 46 of The Environmental Protection Act 1990 so that it includes the option of Local Authorities serving Fixed Penalty Notices for failure to comply with notices rather than having to prosecute through the courts?

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Comments

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**Question 28** ‒

**Environment – Littering from Vehicles**

Do you agree the Welsh Government should introduce powers in Wales that will allow local authorities to be able to issue a financial penalty to a registered keeper of a vehicle if litter has been dropped from that vehicle, regardless of whether the identity of the individual who committed the littering offence is known?

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| Yes |  | No |  | Not sure |  |

Comments

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**Question 29** ‒

**Smarter Regulation – The Role of Basic Measures**

Should basic measures be introduced as a mechanism for regulating low risk activities? Please consider what type of activities would benefit from regulation by basic measures.

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| Yes |  | No |  | Not sure |  |

Comments

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| We agree that a risk based approach enabling flexibility in land management whilst ensuring environmental protection is maintained could be an alternative in certain circumstances to the requirements of the current felling licence regime.  However the overriding need is to KEEP IT SIMPLE.  We have previously suggested that low risk activities like thinning woodlands and forests, which is a normal part of the management process, could be permitted by using best practice guidelines instead of the felling licence system. These best practice guidelines are already available by reference to UKFS and to guidelines like Thinning Control, Forestry Commission field book 2 and others which give a very detailed method statements for conducting the activity.  This normal part of woodland and forest management is part of long term forest planning and notification of intend to conduct the activity would be detailed in the long term management plan concept that WG, NRW and Confor have already developed.  Another clear example which shows just how dysfunctional the present system has become is how throughout Wales and the UK we import firewood from EU and non EU states when we have large areas of unmanaged broadleaved woodlands which could supply this product. The reason is simple, it is uneconomical and the regulatory process is too complicated and too expensive to administer.  We would welcome the opportunity to work with WG and NRW to develop the concept of the long term woodland or forest management plan. A good first step is to share and review the results from the trials that are underway now of the plan template. |

**Question 30** ‒

**Agriculture**

Should the jurisdiction of the Agricultural Land Tribunal Wales be extended?

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Yes |  | No |  | Not sure |  |

Comments

|  |
| --- |
| **Please enter here:.................** |

**Question 31** ‒

**Wildlife**

Do you think the Welsh Government Code of Best Practice on the use of snares in fox control is improving animal welfare standards? Do you have evidence on the effectiveness of the Code in Wales?

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Yes |  | No |  | Not sure |  |

Comments

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| --- |
| **Please enter here:.................** |

**Question 32** ‒

Do you agree clarification of the term ‘‘at least once every day’’ would be beneficial?

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Yes |  | No |  | Not sure |  |

Comments

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| --- |
| **Please enter here:.................** |

**Question 33** ‒

Do you agree a requirement to remove an animal caught would remove ambiguity in relation to the regular checking of snares?

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Yes |  | No |  | Not sure |  |

Comments

|  |
| --- |
| **Please enter here:.................** |

**Question 34** ‒

Should there be a requirement not to possess or sell a self-locking snare? Would this result in any disadvantages?

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Yes |  | No |  | Not sure |  |

Comments

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| --- |
| **Please enter here:.................** |

**Question 35** ‒

Should there be an offence for anyone using or in possession of a snare on any land without the owner/occupiers permission safeguard owner/occupiers from unauthorised setting of snares on their land?

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Yes |  | No |  | Not sure |  |

Comments

|  |
| --- |
| **Please enter here:.................** |

**Question 36** ‒

Should there be further Order making powers for the Welsh Ministers to regulate snares? Would this provide an effective and flexible mechanism to control snare use in the future? Please consider whether Welsh Minsters should have such a broad power to, via Order, specify further requirements such as checking, labelling and for snare operators to be trained.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Yes |  | No |  | Not sure |  |

Comments

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| **Please enter here:.................** |

**Question 37** ‒

**Assessment of Policy Proposals**

Do consultees have any other comments or useful information on the costs and benefits in relation to any of the proposals in this White Paper?

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Yes |  | No |  | Not sure |  |

Comments

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| **Please enter here:.................** |

**Question 38** ‒

Do you think these policy proposals would have an effect on the Welsh language? specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Yes |  | No |  | Not sure |  |

Comments

|  |
| --- |
| **Please enter here:.................** |

**Question 39** ‒

Do you think the proposed policy proposals could be formulated or changed? so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Yes |  | No |  | Not sure |  |

Comments

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| **Please enter here:.................** |

**Question 40** ‒

We have asked a number of specific questions. Do you have any related issues which we have not specifically addressed? Please use this space to report them:

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Yes |  | No |  | Not sure |  |

Comments

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| **Please enter here:.................** |

|  |  |
| --- | --- |
| Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here: |  |

1. <http://gov.wales/docs/desh/publications/170508-future-landscapes-delivering-for-wales-en.pdf> [↑](#footnote-ref-1)