

The Biodiversity and Resilience of Ecosystems Duty

March 2025



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Key facts



Welsh wildlife decreased on average by **20%** between 1994 and 2023.



Around **1 in 6** Welsh species were at risk of extinction in 2023.



It is more than **8 years** since the biodiversity and resilience of ecosystems duty under the Environment (Wales) Act 2016 came into force.



Welsh Government funding that supports biodiversity action includes:

- **£66 million** for the Local Places for Nature Programme between 2021-22 and 2024-25.
- **£54 million** for the Nature Networks Programme, including the Nature Networks Fund, between 2021-22 and 2024-25.



Of public authorities within the scope of our work:

- **49%** have not complied with the requirement to both prepare and publish a biodiversity plan.
- **26%** have at no point complied with the requirement to publish a biodiversity report.



Of public authorities that responded to our Call for Evidence:

- **78%** said they have a clear understanding of the Welsh Government's strategic direction for biodiversity and the resilience of ecosystems.
- **38%** felt the Welsh Government provides effective support and guidance to help them comply with the duty.

Source: Data on wildlife decline is from [State of Nature Wales 2023](#). Opinion data is from our Call for Evidence which covered 53 public authorities, although not all replied to it or to every question. Data on planning and reporting is from our Call for Evidence and additional follow up enquires across the 53 public authorities we covered although, in practice, the duty covers many more bodies (see **Appendix 1**).

Note: The decline in Welsh wildlife between 1994 and 2023 is based on monitoring of 380 species. The species at risk of extinction in 2023 is based on a list of 663 species from 3,897 assessed.

Key messages

About this report

- 1 Put simply, biodiversity is the variety of life on Earth. Although interconnected, biodiversity is commonly defined in terms of diversity in genes within species, between species, and across different ecosystems. Healthy, resilient ecosystems provide us with food, clean water and air, raw materials, and energy for industry. They also protect us against the effects of climate change.
- 2 In 2015, the Welsh Government's Nature Recovery Action Plan¹ (NRAP) recognised Wales was far from reaching national and international biodiversity goals. The [Environment \(Wales\) Act 2016](#) aims to reverse the decline in biodiversity. It places a specific duty on public authorities (see **Exhibit 1**). The Senedd declared a nature emergency in June 2021 and the Welsh Government has said it will embed its response to the climate and nature emergency in everything it does².

Exhibit 1: the biodiversity and resilience of ecosystems duty

Section 6 of the Environment (Wales) Act 2016 (the Act) places an enhanced biodiversity and resilience of ecosystems duty on public authorities (the duty).

The duty requires public authorities to 'maintain and enhance biodiversity so far as consistent with the proper exercise of their functions and in so doing promote the resilience of ecosystems'.

Public authorities must publish a plan setting out what they propose to do to comply with the duty. They must also report on what they have done. Public authorities must review their plan when reporting, although they may revise it at any time.

The first reports were due before the end of 2019, and the second round before the end of 2022. The current three-year reporting period runs to the end of 2025.



Source: Audit Wales summary

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- 1 The Nature Recovery Action Plan comprises two documents: Welsh Government, [Nature Recovery Action Plan: Our Strategy for Nature](#), December 2015, and Welsh Government, [Nature Recovery Action Plan 2020-21](#), 2020.
 - 2 Welsh Government, [Programme for government 2021 to 2026: Well-being-statement](#), June 2021

- 3 Our high-level review considered whether the Welsh Government and other public authorities are responding appropriately to the duty. We looked at Welsh Government leadership and at how public authorities are working to comply, mainly around the planning and reporting requirements. We have not examined their specific biodiversity related actions.
- 4 We have also used our work to share lessons with the Welsh Government as it considers changes to environmental law. The proposals are subject to change but broadly aim to embed a specific set of environmental principles into law, introduce biodiversity targets, and establish a new environmental governance body.
- 5 **Appendix 1** provides more detail about development of the proposals. It also explains the coverage of our work, which focused on 53 public authorities. In practice, the duty covers many more bodies. Those include the Auditor General for Wales and Wales Audit Office.
- 6 **Appendix 2** gives examples of practical actions the Welsh Government suggests public authorities could take to maintain and enhance biodiversity.

Overall conclusion

- 7 The nature emergency has not been a high enough priority for public authorities, and many have failed to comply with the duty's key planning and/or reporting requirements. The Welsh Government has not complied with its own planning requirement, is not effectively monitoring public authorities' compliance, and is currently unable to assess the overall impact of the duty on biodiversity decline.
- 8 Several of the issues we identify have not been addressed fully since being highlighted in a 2021 evaluation³. These include uncertainty about which public authorities the duty covers, the need to strengthen Welsh Government guidance, and holding public authorities to greater account.
- 9 Our report follows a recent report nature loss by the Senedd's Climate Change Environment and Infrastructure Committee⁴. The Committee's report has a different focus from our work, considering broader matters, but it does cover the duty. The Committee recognised commitments that the Welsh Government has made to halt and reverse the loss of nature by 2030. However, it also criticised the pace of its response, including in relation to the proposals to change environmental law.

3 OB3 Research and BRO Partnership, Evaluation of implementation of the Section 6 Biodiversity Duty, 2021 (unpublished). The Welsh Government commissioned the evaluation.

4 Senedd Cymru, Climate Change, Environment, and Infrastructure Committee, [Halting and reversing the loss of nature by 2030](#), January 2025

Key findings

The Welsh Government's role

- Weaknesses in the Act and its guidance leave their coverage and intent open to interpretation and the Welsh Government has been incorrect to assume it is excluded from the duty's planning requirements.
- Most public authorities commented positively on aspects of national strategic leadership but there are areas for improvement in Welsh Government support and guidance.
- There is evidence of some integration of the strategic approach to biodiversity with wider Welsh Government policy but there has been far less national focus on biodiversity than on decarbonisation.
- While the Welsh Government provides various funding streams, public authorities told us about financial and resourcing barriers to maintaining and enhancing biodiversity.
- The Welsh Government is not holding public authorities to account by routinely monitoring or enforcing their compliance with the duty.
- The Welsh Government has not yet set targets for biodiversity and is currently unable to assess the overall impact of the duty on biodiversity decline.

How public authorities are responding

- Nearly half of public authorities have not complied with the requirement to both prepare and publish a biodiversity plan and approaches to planning vary widely.
 - Despite the Welsh Government providing reporting guidance and an optional template, around a quarter of public authorities have never produced a biodiversity report.
 - Public authorities gave broadly positive views about their internal arrangements for maintaining and enhancing biodiversity but, overall, they still need to do more to create a culture adequately focused on the nature emergency.
-



The duty set out in the Act ought to be a powerful statement about the need for all public authorities to take decisive action on biodiversity decline. But good intentions and examples of funding for biodiversity action are not enough. The Welsh Government itself needs to do more to lead by example, support improvement, and take a more active interest in the application and impact of its own legislation. It has an opportunity to do just that as it considers change to environmental law but will need to ensure this area of work gets the priority it deserves if it is to reverse nature loss for future generations.

Adrian Crompton
Auditor General for Wales



Recommendations

- 10 Our recommendations relate mainly to the current duty. We expect the Welsh Government to provide a response now. However, we recognise that it will need to consider its actions alongside its proposals to change environmental law, and alongside its response to the January 2025 report of the Senedd’s Climate Change, Environment, and Infrastructure Committee. We also recognise that some of these actions may, in time, fall to the new environmental governance body it is proposing.

Recommendations

Making clear which public authorities are covered by the duty

- R1 The Welsh Government should publish a list of public authorities covered by the duty. It should do this before the next reporting deadline at the end of 2025. It should update the list when any new public authority covered by the duty is created (see **paragraphs 1.2 to 1.5**).

Monitoring compliance with the duty

- R2 The Welsh Government should require that public authorities submit their biodiversity plans and reports to it when published or revised. It should also follow up with public authorities if they have not published these plans and reports as expected (see **paragraphs 1.35 to 1.40**).
- R3 The Welsh Government should publish reports that provide an overall view on public authorities’ actions, progress, and compliance with the duty (see **paragraphs 1.35 to 1.40**). It should do so every three years in line with the reporting cycle defined by the Act.

Recommendations

Improving planning and reporting

- R4 Before the next reporting deadline at the end of 2025, the Welsh Government should lead by example in publishing a high-quality biodiversity plan and report specific to its own actions (see **paragraphs 1.6 to 1.8**).
- R5 The Welsh Government should work with public authorities to review and revise existing guidance and supporting information around the duty (see **paragraphs 1.12 to 1.21**). This should include:
- a integrating it seamlessly with material produced to support the proposed changes to environmental law;
 - b ensuring public authorities without specific biodiversity expertise can understand it;
 - c tailoring it for different sectors and types of public authority;
 - d ensuring it is all easily accessible in, or through, one place;
 - e clarifying whether guidance has statutory force; and
 - f adapting and sharing its own biodiversity toolkit and impact assessment guidance as resources for other public authorities.
- R6 The Welsh Government should provide public authorities with a planning template. It should ensure this is adaptable to those with stand-alone plans and those that have integrated biodiversity planning into wider plans (see **paragraphs 2.6 to 2.8**).

Recommendations

- R7 The Welsh Government should develop training for public authorities, targeted at staff responsible for developing biodiversity plans and reports (see **paragraph 1.18**). The training should cover the duty and additional requirements arising from the proposed changes to environmental law.
- R8 To improve quality and consistency, the Welsh Government should routinely provide feedback to public authorities on the plans and reports they submit (see **paragraphs 1.38 to 1.40, 2.8, and 2.15**).

Financial implications of changes to environmental law

- R9 The Welsh Government should rigorously assess the costs of its proposed changes to environmental law and ensure there are adequate resources within (or provided to) public authorities to support effective implementation (see **paragraphs 1.32 to 1.34**).



The Welsh Government's role

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- 1.1 This part of our report looks at the Welsh Government's role in setting the legal and policy framework and supporting public authorities. It also touches on the Welsh Government's compliance with the duty.

**What we focused on:**

We looked for evidence of a clearly defined strategic vision, effective support and guidance from the Welsh Government, and robust central monitoring and reporting on public authorities' compliance with the duty.

Weaknesses in the Act and its guidance leave their coverage and intent open to interpretation and the Welsh Government has been incorrect to assume it is excluded from the duty's planning requirements

- 1.2 The Act does not clearly list the public authorities covered by the duty. Instead, it provides a general definition of such a public authority⁵.
- 1.3 Supporting guidance does not fully clarify the situation. The guidance does say that the public authorities covered include those previously subject to section 40 of the [Natural Environment and Rural Communities Act 2006](#), as well as 'any newly created public authorities'. However, the 2006 Act does not list public authorities either.
- 1.4 The Welsh Government has a list of public authorities that it considers covered by the duty. Officials use the list for guidance purposes rather than seeing it as definitive. The Welsh Government believes public authorities should determine whether the duty applies to them, although it provides advice if requested. The Welsh Government has not addressed this issue of uncertainty about coverage since the 2021 evaluation of the duty raised it.
- 1.5 We are aware of five central government bodies within the scope of our work that appear to have incorrectly interpreted that the duty does not apply to them at all. As such, they have not sought to comply. Four of these do not appear on the list the Welsh Government holds.
- 1.6 Meanwhile, the Welsh Government believed the planning requirements did not apply to it until we explained our differing interpretation. It now concedes that it has not complied because it has not published a plan specific to its actions. The Welsh Government has produced various biodiversity related plans, such as the NRAP (see **paragraph 2**), but these are not specific to it.

5 Section 6(9) of the Act.

- 1.7 The Welsh Government has developed a template ‘plan on a page’ to help its departments plan how to maintain and enhance biodiversity in their areas (see also **paragraph 1.24**). However, the Welsh Government has not mandated the template and not all departments have completed it. The Welsh Government now intends to develop a plan that complies with the duty although it has not said when it will do so.
- 1.8 The Welsh Government has published a report⁶ that it believes fulfils the reporting requirements. The report sets out what the Welsh Government says are representative examples of wider policy and programme actions. However, the report does not follow the template structure the Welsh Government has provided for other public authorities and there are gaps in coverage. For example, it does not cover the Welsh Government’s land and buildings management or procurement practices.
- 1.9 Another area of potential uncertainty is around whether and how the Welsh Government expects public authorities to use its guidance in complying with the duty. The Act states that public authorities must ‘have regard to’ certain information and guidance. The Welsh Government considers that this provides flexibility given the wide variation in public authorities’ functions. However, the term is open to interpretation and supporting guidance does not clarify the specific expectations of public authorities.

Most public authorities commented positively on aspects of national strategic leadership but there are areas for improvement in Welsh Government support and guidance

Strategic leadership

- 1.10 The Welsh Government has set a national biodiversity strategy and action plan through the NRAP. The Act also introduced a policy and delivery framework for Sustainable Management of Natural Resources. The framework includes the Natural Resources Policy⁷, State of Natural Resources Report⁸, and Area Statements (see **Exhibit 2**).

6 Welsh Government, [Section 6 biodiversity and resilience of ecosystems duty: summary report 2022](#), December 2022

7 Welsh Government, [Natural Resources Policy](#), August 2017

8 Natural Resources Wales, [State of Natural Resources Report \(SoNaRR\) for Wales 2020](#), December 2020

Exhibit 2: the policy and delivery framework for Sustainable Management of Natural Resources in the Environment (Wales) Act 2016

Sustainable Management of Natural Resources (SMNR)



SMNR is about using natural resources in a way and at a rate that maintains and enhances the resilience of ecosystems and the benefits they provide, that meets the needs of the present generation without compromising the needs of future generations, and that contributes to the seven national well-being goals for Wales. The Act outlines nine supporting principles for SMNR.

State of Natural Resources Report (SoNaRR) for Wales



SoNaRR is a report that Natural Resources Wales must produce setting out, among other things, its assessment of the extent to which SMNR is being achieved and of biodiversity in general. It must also comment on the main trends and factors that are affecting, and are likely to affect, the state of natural resources; and it should describe any aspects where Natural Resources Wales does not have sufficient information to make an assessment.

Natural Resources Policy (NRP)



In the NRP, the Welsh Government must set out its general and specific policies for contributing to SMNR. It must also set out what it considers to be the key priorities, risks and opportunities for SMNR, including what should be done in relation to climate change and biodiversity.

The Welsh Government may include anything it considers relevant to achieving SMNR and must take all reasonable steps to implement the NRP while encouraging others to take such steps. The NRP must take account of the most recent SoNaRR report.

Area Statements



Natural Resources Wales must prepare and publish these statements to facilitate implementation of the NRP. Each statement must reference the natural resources in the area and the benefits they provide. They must also set out the priorities, risks and opportunities for SMNR, how Natural Resources Wales proposes to apply SMNR to address them, and the public bodies that it considers may assist in doing so.

Natural Resources Wales must ensure every part of Wales is included in at least one statement. It must take all reasonable steps to implement an area statement and encourage others to take such steps too.

Natural Resources Wales publishes area statements on its [website](#). They relate to South East Wales, South Central Wales, South West Wales, Mid Wales, North East Wales, North West Wales, and the Marine Area.

Source: Audit Wales summary

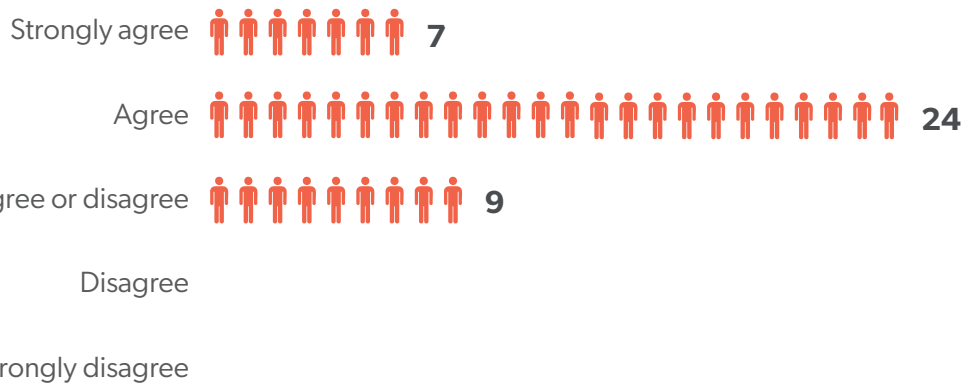
Note: The Act sets out the full requirements for all the above, including the time periods that apply to the publication or review of parts of the framework.

1.11 **Exhibit 3** shows that a majority of public authorities commented positively on aspects of national strategic leadership in our Call for Evidence. Of those that responded to the relevant question:

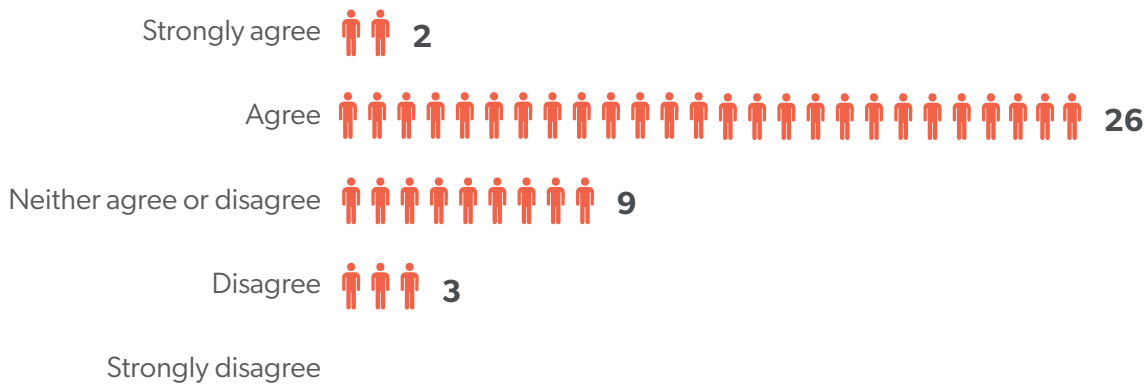
- 31 out of 40 (78%) agreed or strongly agreed they had a clear understanding of the Welsh Government's strategic direction for biodiversity and the resilience of ecosystems;
- 28 out of 40 (70%) agreed or strongly agreed they had a clear understanding of the objectives the Welsh Government has set as part of its strategic direction; and
- 23 out of 40 (58%) agreed or strongly agreed that the Welsh Government effectively collaborates with and involves wider stakeholders in its strategic direction.

Exhibit 3: public authorities' views on aspects of the Welsh Government's strategic leadership

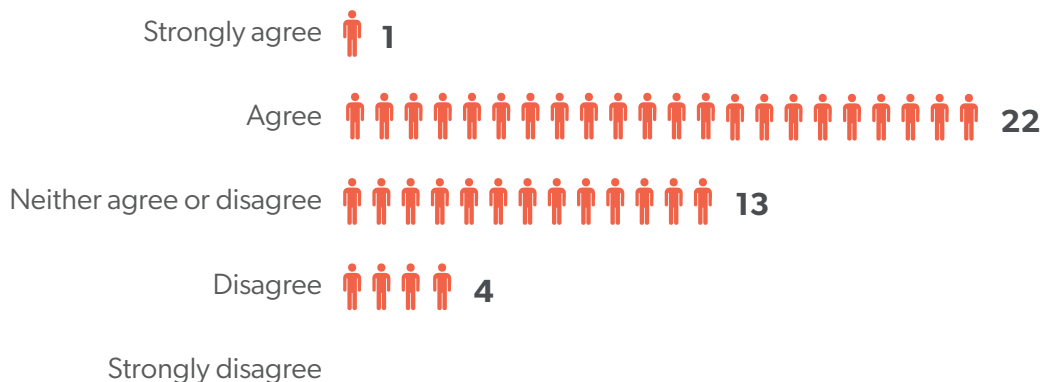
Responses to the statement, 'As an organisation we have a clear understanding of the Welsh Government's strategic direction for biodiversity and the resilience of ecosystems'.



Responses to the statement, 'As an organisation we have a clear understanding of the objectives the Welsh Government has set as part of its strategic direction'.



Responses to the statement, ‘As an organisation we feel the Welsh Government effectively collaborates with and involves wider stakeholders in its strategic direction’.



Source: Audit Wales Call for Evidence

Note: 13 public authorities did not respond to these questions (including the Welsh Government) or did not submit a response at all.

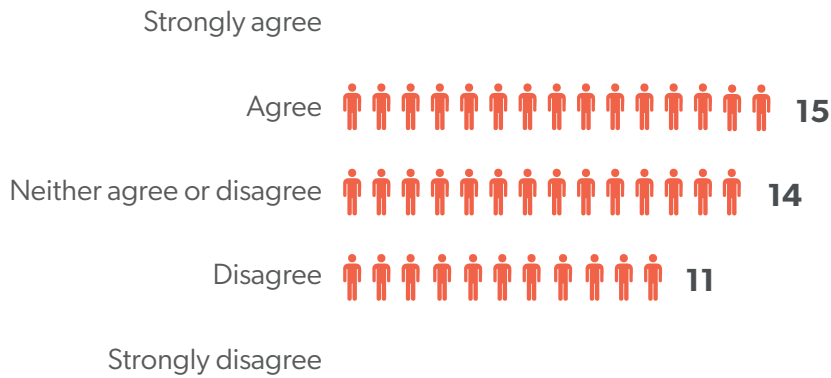
Support and guidance

- 1.12 The Welsh Government has various pieces of guidance and supporting information for public authorities. Despite the Act’s introduction in 2016, it was not until 2018 that the Welsh Government published its first general guidance. It published its first detailed reporting guidance on 8 November 2019. This left little time for public authorities to consider it ahead of the end of 2019 reporting deadline.
- 1.13 Some information is on the Welsh Government website and other information is on the [Wales Biodiversity Partnership website](#)⁹. The 2021 evaluation recommended that Welsh Government guidance on the duty should be improved in several ways. To try to clarify where to find it, the Welsh Government wrote to public authorities in July 2022 with a resource sheet containing links to all guidance.
- 1.14 Weaknesses with guidance remain. Only 15 out of 40 (38%) public authorities that responded to the relevant question in our Call for Evidence agreed that the Welsh Government was providing effective support and guidance (see **Exhibit 4**).

⁹ The Wales Biodiversity Partnership is a network of organisations and individuals committed to biodiversity. See also **paragraph 1.17** and **Exhibit 5**.

Exhibit 4: public authorities' views on Welsh Government support and guidance

Responses to the statement, 'As an organisation, we feel the Welsh Government is providing effective support and guidance to public authorities to help them comply with the duty'.



Source: Audit Wales Call for Evidence

Note: 13 public authorities did not respond to this question (including the Welsh Government) or did not submit a response at all.

- 1.15 Public authorities set out some specific concerns about the policy framework, guidance, and supporting information. These included:
- guidance is contained in various documents in different formats which are, in part, overlapping. This can cause confusion over which is the definitive source of information for public authorities.
 - some important materials are dated. For example, the NRP dates from 2017 and Section 7 of the Act includes two lists of important habitats and organisms that should be used to inform biodiversity planning, but these date from 2006.
 - some public authorities consider that SoNaRR and the Area Statements (see **Exhibit 2**) are too high-level and wide ranging, and that they do not necessarily reflect local circumstances.
 - we also heard calls for further tailored guidance to reflect differences between public authorities of different size, functions, and land ownership. The Welsh Government has previously taken certain action in that regard¹⁰.
 - public authorities without dedicated specialist staff can find information like SoNaRR and the Area Statements difficult to understand and apply.
- 1.16 The Welsh Government provides support to public authorities through the work of its Marine and Biodiversity Division. The division includes a biodiversity team that oversees the delivery and implementation of the section 6 duty. The biodiversity team has a dedicated point of contact providing specific help and guidance on the duty.
- 1.17 Public authorities can also access additional support through the Wales Biodiversity Partnership. The partnership provides biodiversity support through two full time officers funded by the Welsh Government and hosted by Natural Resources Wales (see **Exhibit 5**).
- 1.18 The Welsh Government has held various conferences and workshops and has given presentations to raise awareness of the duty. However, it has not provided formal training on complying with the duty or interpreting the guidance¹¹.

10 In response to a recommendation in the 2021 evaluation, the Welsh Government set out a list of representative actions to take, and good practice examples, for organisations with different land management responsibility. It did this through an update to the Wales Biodiversity Partnership website.

11 The 2021 evaluation had recommended that the Welsh Government host a webinar in late 2021 or early 2022 to promote the duty and launch new guidance. The Welsh Government has provided us with a list of presentations it gave about the duty and it published an [introductory presentation](#) in 2022. The Welsh Government has also part funded the charity Cynnal Cymru to offer broader biodiversity training called Naturewise.

- 1.19 The Welsh Government is planning new guidance to support its plans for changes to environmental law. Separate to this, key elements of the existing framework will be updated including the NRP, SoNaRR, Area Statements, and the Section 7 lists.
- 1.20 The Welsh Government will need to ensure its proposed changes are integrated effectively with the existing framework for the duty. This could otherwise create further confusion for public authorities. More generally, the Welsh Government has an opportunity to update and improve existing guidance and supporting information.
- 1.21 The 2021 evaluation also recommended that the Welsh Government should improve the contact details it holds for public authorities. It recommended targeting communication at senior staff, as well as those actively involved in the duty. The Welsh Government has communicated numerous times via Ministerial letters and emails with senior officers in public authorities. However, officials report finding it difficult to keep their contact list up to date due to staff turnover within public authorities.

There is evidence of some integration of the strategic approach to biodiversity with wider Welsh Government policy but there has been far less national focus on biodiversity than on decarbonisation

- 1.22 The Welsh Government has said it will embed its response to the climate and nature emergency in everything it does. Its Integrated Impact Assessment approach for policy development includes a biodiversity assessment. The questions about embedding biodiversity provide useful prompts and guidance.
- 1.23 The Welsh Government has also developed an internal toolkit for those developing policy. Together with the impact assessment, these provide a framework for policymakers and programme managers to assess how they can maintain and enhance biodiversity and promote the resilience of ecosystems. With modest changes, in our view both could be a useful resource for other public authorities.
- 1.24 The Welsh Government set up an internal biodiversity taskforce in 2020 to improve integration of biodiversity in policy development, public procurement, and wider estate management. The taskforce involves senior staff from across the organisation. It supports, and provides funding towards, internal training courses. The taskforce's outputs include the toolkit mentioned above and its template 'plan on a page' (see **paragraph 1.7**).

- 1.25 Examples of the Welsh Government integrating biodiversity and nature ambitions with wider policies include Planning Policy Wales¹². This includes detailed guidance on how planning authorities should integrate biodiversity considerations into planning processes. The Welsh Government has also published a specific biodiversity action plan relating to the strategic road network¹³.
- 1.26 Among public authorities that responded to the relevant question in our Call for Evidence, 22 out of 39 (56%) agreed or strongly agreed with the statement, ‘As an organisation we understand how the Welsh Government’s strategic direction on biodiversity and the resilience of ecosystems is integrated with its other key policy ambitions’. Of the others, 13 (33%) neither agreed nor disagreed, and four (10%) disagreed or strongly disagreed.
- 1.27 The main issues that public authorities raised around policy integration are summarised below:
- some public authorities talked about competing policy. For example, they raised concerns that the Welsh Government’s focus on tree planting through proposals for the Sustainable Farming Scheme could impact negatively on biodiversity in various ways. The Welsh Government told us that there are opportunities to plant trees on farms in Wales which provide benefit for farmers, nature, and the environment. The requirement in the scheme to have 10% tree cover has been removed to ensure farmers are able to take appropriate decisions. The Welsh Government said it will continue to support appropriate planting as it finalises the scheme.
 - another concern raised was around the potential disconnect between economic priorities and the strategic approach to biodiversity, because economic systems based on growth and use of natural resources can negatively affect biodiversity.
 - some public authorities said the nature emergency does not attract the same level of strategic attention as the climate emergency, at a national level. This is an issue that also arose during our interviews with Welsh Government officials and other key stakeholders. And some health bodies commented on a lack of clarity about how the duty links to the NHS Wales strategic approach to decarbonisation.

12 Welsh Government, [Planning Policy Wales, Edition 12](#), February 2024

13 Welsh Government, [Llwybr Newydd i Natur, The Welsh Strategic Road Network Nature Recovery Action Plan](#), October 2023

While the Welsh Government provides various funding streams, public authorities told us about financial and resourcing barriers to maintaining and enhancing biodiversity

- 1.28 The Welsh Government does not provide direct funding to public authorities for the specific purpose of implementing the duty because it expects public authorities to integrate the requirements into their existing functions. However, it has various funding streams that support wider biodiversity action and, as such, contribute to complying with the duty. The Welsh Government is unable to quantify its total investment in biodiversity given the breadth of these funding streams.
- 1.29 **Exhibit 5** sets out some of the main allocations more directly related to biodiversity. The most substantial of these examples are the Local Places for Nature Programme, and the Nature Networks Programme and Nature Networks Fund.

Exhibit 5: examples of Welsh Government funding streams that support biodiversity action in Wales

Funding stream Details

Local Places for Nature Programme



The Welsh Government allocated **£66 million** to this programme between 2021-22 and 2024-25 to deliver projects through local nature partnerships.

This is part of a programme that began in 2020, aiming to create 'nature on your doorstep'. The programme includes five schemes delivered by other organisations that collectively aim to create areas that support nature within communities, encourage a greater appreciation and value of nature, create more green spaces, and support wider biodiversity objectives.

The Welsh Government has also funded a post within One Voice Wales to support town and community councils to develop and deliver local places for nature projects.

Funding stream Details

Nature Networks Programme and Nature Networks Fund

The Welsh Government allocated **£54 million** to the Nature Networks Programme (NNP) and Nature Networks Fund (NNF) between 2021-22 and 2024-25.

The NNF began in 2021-22 and is administered by the National Lottery Heritage Fund. Through the NNF, individuals or organisations can apply for grants to fund projects that aim to improve the condition and resilience of protected land and maritime sites.



The NNP began in 2022-23, subsuming the NNF. The NNP aims to improve the conditions, connectivity and resilience of the protected sites network.

Alongside the NNF, the NNP includes an allocation to Natural Resources Wales. Through the NNP, Natural Resources Wales is working with landowners and other stakeholders to implement management measures that address the programme's objectives.

Local Nature Partnership Cymru

As part of the allocation above regarding the Local Places for Nature Programme, the Welsh Government allocated **£3.3 million** covering 2022-23 to 2024-25, for the Local Nature Partnership's work in supporting implementation of the duty and of the deep dive recommendations (see **paragraph 1.43**).



This partnership aims to build a nature recovery network across Wales. It is coordinated by Wales Council for Voluntary Action (WCVA).

The partnership consists of all local authorities and national park authorities in Wales, the Wales Biodiversity Partnership, WCVA and the Local Environmental Records Centres (see below).

Biodiversity Taskforce

The Welsh Government provides **£500,000** in annual funding to this internal taskforce (see **paragraph 1.24**).

In 2024-25, the taskforce is focusing on building a better understanding across the Welsh Government of the biodiversity challenge and potential to deliver impact.



Examples of activities funded include development of training, supporting development of new targets, implementing the deep dive recommendations, and supporting students on placement.

Funding stream Details

Local Environmental Records Centres

The Welsh Government provided **£107,000** in 2022-23 and **£119,000** in both 2023-24 and 2024-25 for Local Environmental Records Centres. These capture, and provide access, to resources relating to wildlife data.



Wales Biodiversity Partnership

The Welsh Government allocated **£100,000** to the partnership in both 2022-23 and 2023-24, and **£115,000** in 2024-25.



The funding contributes to the partnership's support team that provides advice to public authorities on the duty, assists in facilitating national biodiversity policy, provides support to Local Nature Partnerships, promotes good practice, and coordinates a national biodiversity conference.

Source: Audit Wales summary of Welsh Government information

Note: The Nature Networks Fund began in 2021-22. The Welsh Government launched the Nature Networks Programme in 2022-23. It subsequently deemed the Nature Networks Fund a suitable mechanism to help deliver the aims of the Nature Networks Programme. Therefore, since 2022-23 the Nature Networks Fund is treated as part of the wider Nature Networks Programme, although having a separate funding allocation.

1.30 Public authorities told us about various financial and resourcing issues that impacting on their biodiversity related action. We have previously reported on similar concerns in other contexts. In summary:

- while some welcomed the available funding, others said the funding was not enough to deliver everything that was required. As such, they were having to find funding from existing budgets and take difficult decisions on relative priorities.
- some said they needed more continuity of funding, with short-term funding contributing to a reliance on temporary posts. For example, we heard that funding through the Local Places for Nature Programme (see **Exhibit 5**) had been helpful, but its long-term future was uncertain. The Welsh Government has now confirmed a £16.4 million allocation for the scheme in 2025-26 and is working on the assumption of a similar allocation in 2026-27.
- some said that last minute funding for capital projects is not helpful because schemes need a lead in time. They also highlighted that additional revenue funding is not being provided to accompany specific capital schemes. For example, funding for most green infrastructure projects, such as tree planting, does not include money for long-term maintenance.

1.31 Only 17 out of 40 (43%) public authorities that responded to the relevant question in our Call for Evidence agreed or strongly agreed with the statement ‘Our organisation understands the financial implications of complying with the duty’. Of the others, 13 (33%) neither agreed nor disagreed and 10 (25%) disagreed or strongly disagreed.

1.32 In responses to the consultation on the Welsh Government’s proposed changes to environmental law, stakeholders highlighted the need for adequate resources to implement the changes required. While in our Call for Evidence, some public authorities also expressed concerns about capacity constraints in Natural Resources Wales, and that the new proposals would increase demands on it.

1.33 The Welsh Government has said it will examine resource availability thoroughly to support the proposed changes. It has also launched a separate consultation on a new approach to finance for nature’s recovery, aiming to increase and diversify the funding available¹⁴.

1.34 We would expect the Welsh Government to set out estimated costs as part of its Regulatory Impact Assessment. However, our better law-making report in 2020¹⁵ highlighted concerns about how certain previous assessments for other laws have underestimated implementation costs.

14 Welsh Government, [Draft Sustainable Investment Principles](#), September 2024

15 Auditor General for Wales, [Better law making: the implementation challenge](#), September 2020

The Welsh Government is not holding public authorities to account by routinely monitoring or enforcing their compliance with the duty

- 1.35 The Welsh Government commissioned an evaluation into implementation of the duty in 2021. The evaluation report stated that, ‘the main impact of the duty has been to increase awareness and understanding of biodiversity across public authorities’. It noted that the duty had also, ‘contributed positively, but to a lesser degree, to biodiversity becoming more embedded across public authorities’ decision making and service delivery’.
- 1.36 The evaluation found that further work was required to improve implementation and compliance. It made eight recommendations for improvement. The Welsh Government did not respond formally and did not publish the evaluation report.
- 1.37 As reflected in other sections of this report, several issues that gave rise to the recommendations remain unresolved. For example, while national guidance says public authorities should send their plans and reports to the Welsh Government, this is not required by the Act itself. In 2022, the Welsh Government wrote to public authorities to reinforce the need to submit reports. It has confirmed that not all do and that it does not follow this up¹⁶.
- 1.38 In addition, the Welsh Government does not routinely review or comment on the quality of the plans and reports it is aware of. Nor does it seek to pull together any overall analysis from them. Officials provide ad-hoc feedback, if requested, to staff in public authorities that have drafted the plans and reports.
- 1.39 There are no consequences for public authorities that do not comply with the duty. Some public authorities told us that if there were, implementing the duty would be given greater priority. While the Welsh Government has considered other actions, including fines, it decided this would be counterproductive.
- 1.40 The Welsh Government sees its role as supporting public authorities and encouraging them to act. In future, the new environmental governance body the Welsh Government is proposing (see **paragraph 1.45**) could have a key role in monitoring progress and holding public authorities to account.

16 The Wales Biodiversity Partnership website lists reports that the Welsh Government is made aware of or that have been submitted to it. However, this list is not definitive.

The Welsh Government has not yet set targets for biodiversity and is currently unable to assess the overall impact of the duty on biodiversity decline

- 1.41 Maintaining and enhancing biodiversity is complex and inherently difficult to measure. The Welsh Government is currently unable to robustly assess the overall impact of the duty on biodiversity decline.
- 1.42 There are no specific, domestic targets for biodiversity in Wales. In 2021, a report from environmental stakeholders called on the Welsh Government to introduce statutory, domestic biodiversity targets¹⁷. The report said that the existing framework had failed to reduce the loss of biodiversity over the previous decade.
- 1.43 While there are currently no domestic targets, the Welsh Government used an international target for a 2022 'deep dive' review¹⁸ to consider how action to support nature recovery could be sped up. The review group chose the '30x30 target' as its strategic focus. The target is part of the Global Biodiversity Framework agreed at COP15¹⁹. It refers to protecting and effectively managing at least 30% of land, freshwater, and sea for nature by 2030.
- 1.44 We have not considered the 30x30 target. However, some public authorities told us there was a lack of clarity and guidance on how the target should be measured or achieved, and on the actions required²⁰. The Welsh Government is currently reviewing the actions it is taking to prioritise delivery of the 30x30 target. It acknowledges there are areas where more progress could be made.
- 1.45 The Welsh Government's proposals to change environmental law would potentially:
- introduce targets and statutory duties for the protection and restoration of biodiversity in Wales, including requirements for monitoring, reporting and scrutiny; and
 - establish an environmental governance body, whose remit will include overseeing public authority compliance with the duty and delivery of the new biodiversity targets.
- 1.46 If implemented effectively, these proposals have the potential to strengthen monitoring and enforcement. We would expect the Welsh Government to collaborate with wider stakeholders to ensure its targets and goals are realistic, achievable, and aligned with other requirements.

17 RSPB Cymru and WWF Cymru, supported by Wales Environment Link, [Putting Wales on a Path to Nature Recover: the case for nature recovery targets in Wales](#), June 2021

18 Welsh Government, [Biodiversity deep dive: recommendations](#), October 2022

19 COP15 is the Conference of the Parties to the Convention on Biodiversity.

20 The Cabinet Secretary for Climate Change and Rural Affairs provided an update on the response to the deep dive in a [written statement](#) in July 2024. The response referred to an expert working group tasked with developing monitoring and evidence frameworks.



How public authorities are responding

02

- 2.1 This part of our report looks at how public authorities are responding to the duty and the barriers they are facing in doing so. Our analysis in this section sometimes considers all 53 public authorities within the scope of our work. At other times it is based on a subset of public authorities based on their planning and reporting arrangements and/or those who responded to specific questions in our Call for Evidence. As noted in **paragraph 1.5**, five public authorities that we contacted did not consider that the duty applied to them at all.

**What we focused on:**

We looked for evidence that public authorities have prepared and published biodiversity plans, put in place appropriate operational and governance arrangements to deliver them, and are monitoring and reporting on progress.

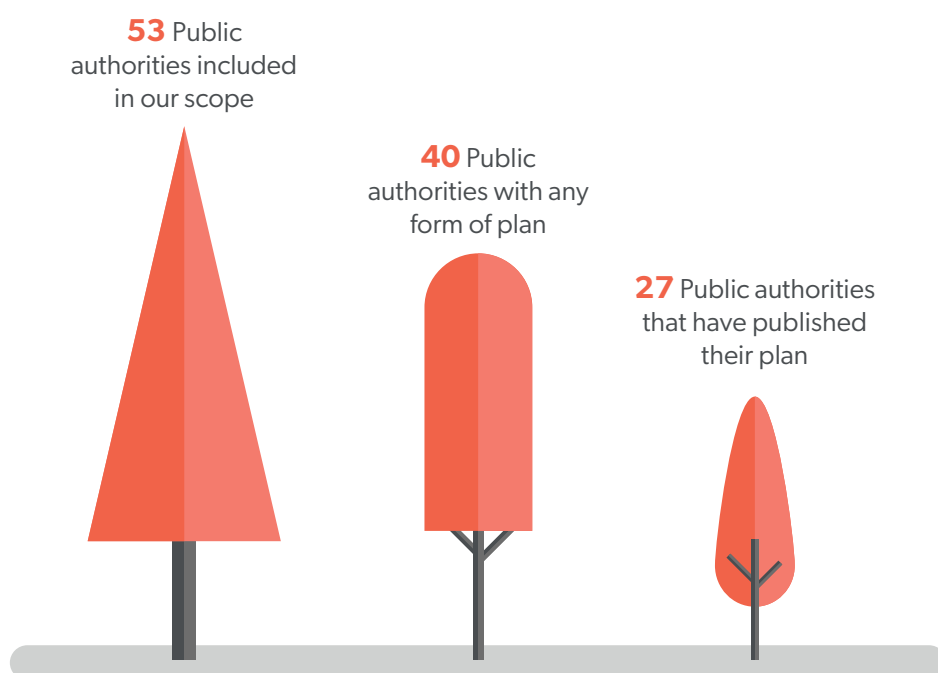
Nearly half of public authorities have not complied with the requirement to prepare and publish a biodiversity plan and approaches to planning vary widely

- 2.2 The duty requires public authorities to prepare and publish a biodiversity plan. The plan should set out what the public authority proposes to do to comply with the duty to maintain and enhance biodiversity in the exercise of its functions. The Act also states that public authorities must review the plan in the light of each report that it publishes, and that public authorities may revise the plan at any time.
- 2.3 Welsh Government guidance says that the plan should set out steps that a public authority intends to take across each of its functions. These steps should, as far as possible, be guided by the six NRAP objectives²¹. The guidance provides examples of actions public authorities might plan to take but these are limited.

21 The objectives are: 1 – engage and support participation and understanding to embed biodiversity throughout decision making at all levels; 2 – safeguard species and habitats of principal importance and improve their management; 3 – increase the resilience of our natural environment by restoring degraded habitats and habitat creation; 4 – tackle key pressures on species and habitats; 5 – improve our evidence, understanding and monitoring; 6 – put in place a framework of governance and support for delivery.

2.4 **Exhibit 6** sets out our understanding of the status of public authorities' plans. We found that 13 out of 53 (25%) had not prepared a plan²². Of the 40 (75%) that had some form of plan²³, only 27 had published it. Therefore, 26 out of 53 (49%) public authorities had not complied with the requirement to both prepare and publish a plan. Compliance was higher in local government than in other sectors.

Exhibit 6: public authority compliance with duty to prepare and publish a biodiversity plan



Source: Audit Wales Call for Evidence, supplemented by further evidence gathering. See **Appendix 1** for further details.

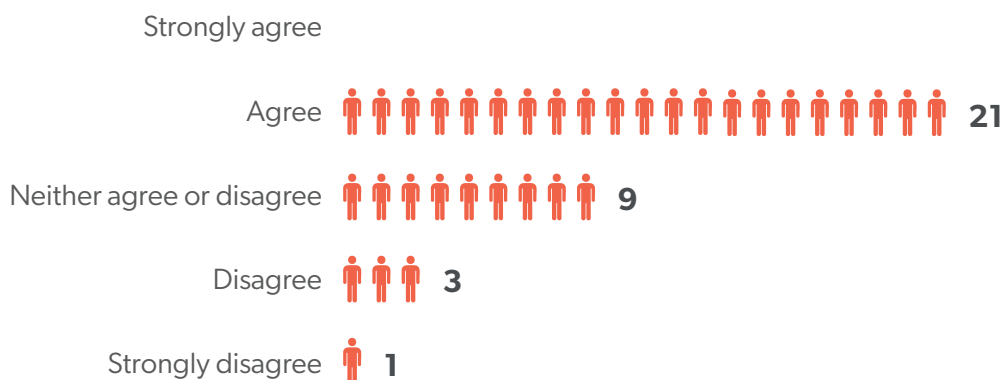
Note: 20 out of 28 (71%) local government bodies (councils, national parks, and fire and rescue authorities) have published a plan. The corresponding figure in health bodies was 4 out of 12 (33%). In central government it was 3 out of 13 (23%).

²² 3 of the 13 public authorities that have not prepared and published a plan indicated that they intended to do so in future.

²³ This figure includes stand-alone plans and biodiversity plans that are incorporated into wider corporate planning, and both published and unpublished plans.

2.5 **Exhibit 7** shows that of the 34 public authorities that have a plan, either published or unpublished, and responded to the relevant question in our Call for Evidence, 21 (62%) agreed they found Welsh Government guidance useful when preparing their plan.

Exhibit 7: public authorities’ responses to the statement, ‘In preparing our biodiversity plan, we have found the Welsh Government guidance on biodiversity planning to be useful’



Source: Audit Wales Call for Evidence. See **Appendix 1** for further details.

Note: We have included in this analysis only those public authorities that have a biodiversity plan, either published or unpublished. The analysis excludes public authorities that did not respond to the relevant question in our call for evidence or did not submit a response at all.

2.6 We also asked public authorities whether, in developing their biodiversity plans, they had considered four important sources of information that the Act requires them to ‘have regard to’. We found that²⁴:

- 31 out of 33 (94%) said they had used the six objectives in the NRAP;
- 28 out of 33 (85%) said they had used the most up to date version of SoNaRR;
- 26 out of 33 (79%) said they had used the Section 7 list of habitats and species of principal importance for Wales; and
- 23 out of 33 (70%) said they had used relevant Area Statements.

²⁴ In relation to these bullet points, we have included in our analysis only those public authorities that have a biodiversity plan, either published or unpublished. The analysis excludes public authorities that did not respond to the relevant question in our call for evidence or did not submit a response at all.

- 2.7 Public authorities told us that their planning is complicated by the lack of a Welsh Government template. The guidance²⁵ on planning is also unclear in places, particularly around whether plans should be stand-alone. For example, it states that best practice is for Section 6 plans to form part of other business or corporate planning documents. However, it goes on to say that while preparation of a stand-alone plan may not be necessary, it may be useful operationally.
- 2.8 We found that public authorities have adopted a variety of approaches to planning, and there is wide variation in the status and content to their plans. For example:
- local authorities tend to have prepared a dedicated plan relating to the duty. However, some acknowledged their plans are out of date.
 - in health bodies, where plans have been prepared, they tend not to be stand-alone plans, rather they are part of wider decarbonisation or climate change plans. The initiatives in these plans appear patchy in coverage.
 - central government bodies' plans tend to be stand-alone documents rather than integrated with other corporate documents.
 - national park authorities have integrated their biodiversity planning into overall corporate planning and wider organisational policies, plans and programmes.
 - the three fire authorities have a joint biodiversity plan that follows the NRAP objectives.
- 2.9 Public authorities gave largely positive views about the extent to which their planning on biodiversity was integrated and aligned with their wider corporate planning and priorities. In response to relevant questions in our Call for Evidence²⁶:
- 36 out of 42 (86%) public authorities agreed or strongly agreed that their planning on biodiversity and resilience of ecosystems is integrated with their overall corporate planning. Of the others, five (12%) neither agreed nor disagreed and one (2%) disagreed.
 - 35 out of 42 (83%) public authorities agreed or strongly agreed that their planning on biodiversity and resilience of ecosystems aligns with wider organisational policies, plans, and programmes, for example net zero. Of the others, six (14%) neither agreed nor disagreed and one (2%) disagreed.

25 Welsh Government, [Guidance for Section 6 – The Biodiversity and Resilience of Ecosystems Duty Frequently asked Questions](#), February 2022

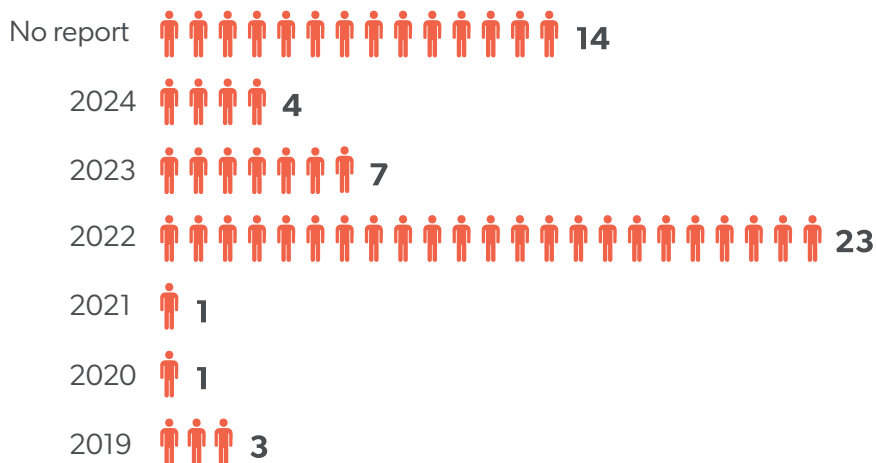
26 We have included in this analysis all public authorities that responded to the relevant question, regardless of whether they have a published biodiversity plan.

Despite the Welsh Government providing reporting guidance and an optional template, around a quarter of public authorities have never produced a biodiversity report

- 2.10 The duty says that public authorities must publish reports setting out what they have done to comply with the duty. Public authorities must report within three yearly intervals. Public authorities should first have reported before the end of 2019 and then before the end of 2022. They are due to report again before the end of 2025.
- 2.11 **Exhibit 8** sets out when public authorities within the scope of our work published their latest biodiversity report. It shows that 14 out of 53 (26%) public authorities have never published a biodiversity report. Of the 39 (74%) public authorities that have published a report, five last reported before 2022, 23 last reported during 2022 and 11 last reported after 2022.

Exhibit 8: year in which public authorities last published a biodiversity report under the duty

Date of most recent report



Source: Audit Wales Call for Evidence, supplemented by further evidence gathering. See **Appendix 1** for further details.

Note: Of the 23 public authorities that last reported in 2022 (the final year of the last reporting cycle), 17 were local government bodies (councils, national parks and fire and rescue authorities), three were health bodies, and three were central government bodies.

- 2.12 The Welsh Government has provided guidance on reporting (see **paragraphs 1.12 to 1.15**) and a [report template](#) for public authorities. The template is based on the six objectives in the NRAP (see **paragraph 2.3**). Some public authorities told us they thought the reporting template was a useful tool. Others felt improvements were required, for example to better tailor the template for types and sizes of public authorities.
- 2.13 The report template is not mandated. A core guidance document²⁷ states, 'Organisations are encouraged to identify their own ways of reporting - this could again be part of their ordinary reporting systems and/or process, such as their annual report, or as a specific document'.
- 2.14 Only 13 out of 30 (43%) public authorities that have reported either agreed or strongly agreed they had used the template when preparing their report²⁸. Overall, our review has shown inconsistency of reporting style, approach, content, timing, and frequency. For example, we found a mixture of standalone reports and integration of reporting within other mechanisms such as annual reports or environmental performance reports. The level of detail included within reports also varied from some very short descriptions of examples of actions taken by public authorities to comprehensive updates on progress against biodiversity plans.
- 2.15 Such inconsistency makes it difficult to compare the actions that different public authorities have taken in response to the duty. Notwithstanding its reporting template, the Welsh Government told us that it wanted to enable public authorities to take a flexible approach in how they implement the duty. The Welsh Government accepts that this makes it difficult to establish an overall national picture of how the duty has been discharged.

Public authorities gave broadly positive views about their internal arrangements for maintaining and enhancing biodiversity but, overall, they still need to do more to create a culture adequately focused on the nature emergency

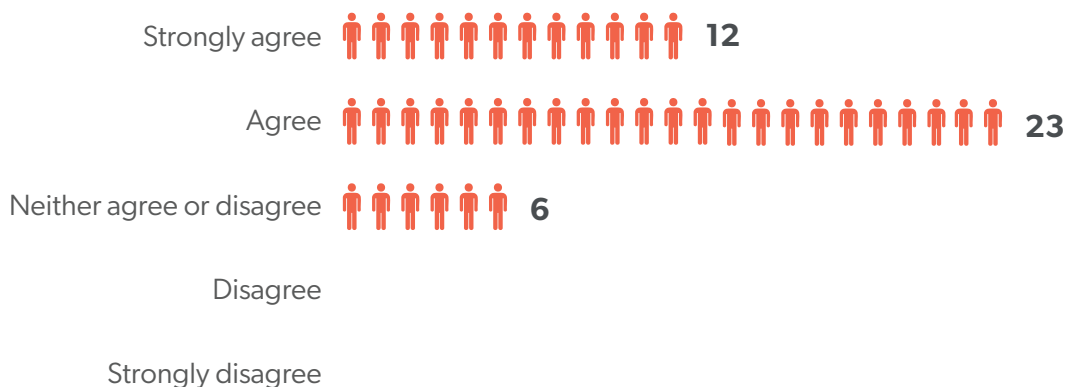
- 2.16 Public authorities gave broadly positive views about their internal arrangements for leading and monitoring action on biodiversity (see **Exhibit 9**). Of those that responded to the relevant question in our Call for Evidence:
- 35 out of 41 (85%) agreed or strongly agreed their organisation has clear lines of responsibility for leading the delivery of its biodiversity plan/actions; and
 - 31 out of 41 (76%) agreed or strongly agreed their organisation has established clear governance processes for monitoring progress with its actions relating to biodiversity and resilience of ecosystems.

27 Welsh Government, [Guidance for Section 6 – The Biodiversity and Resilience of Ecosystems Duty. Frequently Asked Questions](#), February 2022

28 We have included in this analysis only those public authorities that have published a biodiversity report. The analysis excludes public authorities that did not respond to the relevant question in our Call for Evidence or did not submit a response at all.

Exhibit 9: public authorities' views on their internal arrangements for leading and monitoring action on biodiversity

Responses to the statement, 'Our organisation has clear lines of responsibility for leading the delivery of its biodiversity plan/actions'.



Responses to the statement, 'Our organisation has established clear governance processes for monitoring progress with its actions relating to biodiversity and resilience of ecosystems'.



Source: Audit Wales Call for Evidence.

Note: 12 public authorities did not respond to this question or did not submit a response at all. We have included in this analysis all public authorities that responded to the relevant question, regardless of whether they have a published biodiversity plan.

- 2.17 While we have not evaluated these arrangements, responses revealed a wide range of different systems and processes in place for public authorities' internal oversight and governance. These ranged from officer level working groups, specific programme boards, and board or cabinet level reporting.
- 2.18 Some local authorities mentioned that scrutiny committees participate in overseeing biodiversity work. In health bodies, biodiversity tends to be scrutinised via governance structures for the wider decarbonisation agenda. National park authorities have embedded monitoring arrangements into wider corporate planning and reporting.
- 2.19 Despite the generally positive views reflected in **Exhibit 9**, public authorities reported that issues of capacity and capability were impacting on their ability to comply with the duty, particularly outside of local government. As described in **paragraph 1.30**, they also told us that short-term external revenue funding means that posts to support biodiversity action are not secure.
- 2.20 Only 27 out of 41 (66%) public authorities that responded to the relevant question in our Call for Evidence agreed or strongly agreed that they had access to sufficient expertise. Of the others, five (12%) neither agreed nor disagreed and nine (22%) disagreed.
- 2.21 The 2021 evaluation found that the duty had contributed to biodiversity becoming more embedded in decision making and service delivery. However, only 20 out of 40 (50%) public authorities that responded to the relevant question in our Call for Evidence agreed that biodiversity action is fully embedded throughout the organisation and in its decision making. Of the others, 11 (28%) neither agreed nor disagreed and nine (23%) disagreed.
- 2.22 Some public authorities acknowledged there needs to be a significant shift in their internal culture, and increased training, to deliver effectively against the duty and the broader nature emergency. The Welsh Government hopes that its proposals for changes to environmental law will strengthen public authorities' responses. However, this remains to be seen.



Appendices

- 1 About our work
- 2 Practical steps for maintaining and enhancing biodiversity

1 About our work

Audit question, scope, and criteria

We considered whether the Welsh Government and other public authorities are responding appropriately to the Section 6 enhanced biodiversity and resilience of ecosystems duty (the duty) under the [Environment \(Wales\) Act 2016](#).

We looked at Welsh Government leadership and at action it is taking itself. We also considered how other public authorities had responded, mainly around the planning and reporting requirements (see **Exhibit 1**). We have not conducted local fieldwork to examine public authorities' biodiversity related actions in more detail.

In developing our audit criteria, we considered the statutory duties set out in the Act and [Welsh Government guidance](#). We also considered findings from a 2021 evaluation of the duty and [guidance on good governance](#). We have set out our areas of focus at the start of each part of the report.

In deciding which public authorities to cover, we considered:

- whether the Auditor General for Wales is the external auditor. For example, the Auditor General is not the auditor of higher and further education bodies.
- whether a public authority is clearly covered by section 6(9) of the Environment (Wales) Act 2016.
- whether a public authority is covered by the [Well-being of Future Generations \(Wales\) Act 2015](#)²⁹. This included those to whom that Act was extended in 2024.

We also excluded certain smaller or newer bodies that the Auditor General does audit. These included the four Corporate Joint Committees and approximately 730 town and community councils. The Welsh Government has provided separate [guidance and a reporting template](#) for town and community councils, which we have not considered as part of our work.

²⁹ While action on biodiversity could support other goals, one of the seven well-being goals for Wales is a 'resilient Wales'. This is defined as, 'A nation which maintains and enhances a biodiverse natural environment with healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change (for example climate change)'.

We included 53 public authorities in our scope, and our commentary regarding the Welsh Government's framework to support compliance with the duty is that which relates to these bodies. These included 12 NHS bodies (health boards, trusts, and special health authorities), 22 local authorities, the three fire and rescue authorities, and the three national park authorities. They also included 13 central government bodies:

- Arts Council of Wales.
- Centre for Digital Public Services.
- Higher Education Funding Council for Wales (HEFCW)³⁰.
- National Library of Wales.
- Amgueddfa Cymru (Museum Wales).
- Natural Resources Wales.
- Qualifications Wales.
- Senedd Commission.
- Sport Wales.
- Social Care Wales.
- Transport for Wales.
- Welsh Government.
- Welsh Revenue Authority.

During our work, the Welsh Government has been developing proposals for changes to environmental law. In January 2024, the Welsh Government consulted on a white paper that set out initial proposals³¹. The Welsh Government has published a summary of consultation responses. It has also published a response to that feedback³². We shared emerging findings with the Welsh Government to inform its policy development.

30 HEFCW no longer exists. The Commission for Tertiary Education and Research, known as Medr, has taken on HEFCW's functions. Medr became fully operational from 1 August 2024.

31 Welsh Government, [Consultation on the White Paper: Securing a Sustainable Future: Environmental Principles, Governance and Biodiversity targets for a Greener Wales](#), January 2024

32 Welsh Government, [Summary of responses to the Consultation on Environmental principles, governance, and biodiversity targets: White Paper](#), July 2024, and Welsh Government, [Summary of Responses to Question GB13](#), July 2024.

We also discussed emerging findings with an informal group of stakeholders on climate and nature convened by the Office of the Future Generations Commissioner. This ‘Supporting Organisations Network’ includes Natural Resources Wales, Public Health Wales, and the Welsh Local Government Association.

Towards the end of our work, the Senedd’s Climate Change, Environment, and Infrastructure Committee published its report on Halting and Reversing the Loss of Nature by 2030. We made the Committee aware of the scope of our work at an early stage of its inquiry and discussed our emerging findings with its clerking team.

Audit methods

Document review

We reviewed a range of documentation including:

- the Environment (Wales) Act 2016 itself;
- policy documents such as: Welsh Government strategy and guidance documents, information provided by public authorities in response to our Call for Evidence, and materials related to the Welsh Government’s proposals for changes to environmental law;
- a summary published by Senedd Research in 2019³³.

Call for Evidence

In designing our Call for Evidence, we considered the views of the Welsh Government and Natural Resources Wales.

We sent the final document to the 53 public authorities mentioned above. We asked for information relevant to their compliance with the duty. We also asked their opinions on barriers to complying with the duty and on the Welsh Government’s strategic leadership.

During spring 2024, we received responses from 45 public authorities. Some responses did not address all our questions.

We later contacted the public authorities that had not responded to confirm the status of their biodiversity plans and reports. In a small number of cases, we have made a judgement call about whether public authorities’ documents meet the duty’s planning and reporting requirements.

33 Senedd Research, Sustainable Management of Natural Resources and the Environment (Wales) Act 2016, January 2019

Semi-structured interviews

We interviewed Welsh Government officials and other key stakeholders, including staff from Natural Resources Wales and the Welsh Local Government Association.

Workshops

We held three workshops with staff from a selection of public authorities in Abergavenny, Porthmadog, and Swansea during October and November 2023, as part of our initial research. We also observed three Welsh Government workshops with stakeholder organisations – in March, July, and September 2024 – run by the team developing the proposed changes to environmental law.

Audit Wales's approach to complying with the duty

The duty covers both the Auditor General for Wales and the Wales Audit Office. They are in the group of public authorities that own or occupy an office building only and whose functions are not directly connected to biodiversity and/or land management (see **Appendix 2**).

The Auditor General and Wales Audit Office jointly prepared and published biodiversity plans in 2019³⁴ and 2023³⁵. They last reported through Audit Wales's Annual Report and Accounts 2022-23³⁶ having adopted a similar approach the previous year and following a stand-alone report in 2019. They will report again in 2025-26.

34 Audit Wales, [Biodiversity and Resilience of Ecosystems Report and Forward Plan](#), December 2019

35 Audit Wales, [Biodiversity and Resilience of Ecosystems Plan 2023 – 2027](#), July 2023

36 Audit Wales, [Annual Report and Accounts 2022-23](#), June 2023

2 Practical steps for maintaining and enhancing biodiversity

The Welsh Government identifies three public authority groupings. The groups have a bearing on what maintaining and enhancing biodiversity consistent with a public authority's functions might mean. **Exhibit 10** provides examples drawing from Welsh Government guidance.

Exhibit 10: practical actions the Welsh Government suggests public authorities could take to comply with the duty

Context	Examples
<p>Group 1</p> <p>Public authorities that own or occupy an office building only and whose functions are not directly connected to biodiversity and/or land management.</p>	<p>Possible actions relate to building management, procurement, sustainability, awareness raising, training or partnership with other organisations.</p> <p>Examples include ensuring office supplies are sustainably sourced, training for procurement staff in sustainable procurement principles, sustainability risk assessments, and considering whole life costs.</p>
<p>Group 2</p> <p>Public authorities that own, occupy or manage land, their own buildings and grounds, with functions connected to biodiversity and/or land management, or that can influence those who own or manage land.</p>	<p>Possible actions include those above, plus grounds management, cascading funding criteria, and providing education and training.</p> <p>Examples include introducing a sustainability induction for staff, covering the duty, the organisation's biodiversity strategy, action plan, and biodiversity projects.</p> <p>Another example is leaving a green area along a fence line uncut to allow grass and brambles to grow. Or leaving cut branches on the ground to decay naturally and provide a habitat for bugs.</p>

Context	Examples
<p>Group 3</p> <p>Public authorities that own or manage land beyond their own grounds, whether they have functions connected with biodiversity and/or land management or not.</p>	<p>Possible actions include those above, plus land management to maintain and enhance biodiversity, and promote resilience of ecosystems.</p> <p>Examples include changing mowing regimes by reducing the frequency of cuts, increasing the height of the blade, and removing cuttings.</p> <p>Another example is adding a biodiversity question to annual service evaluations to provide a baseline to judge performance in future years.</p>

Source: Audit Wales summary of examples from [Introduction to the Section 6 Biodiversity and Resilience of Ecosystems Duty](#)

Note: The [Wales Biodiversity Partnership](#) website and Welsh Government [reporting guidance](#) set out the Welsh Government's definitions of three different groups of organisations.



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Rydym yn croesawu gohebiaeth a galwadau ffôn yn Gymraeg a Saesneg.