

Unconfirmed Minutes

Title of meeting: NRW Board Meeting – Public Session
All Attendees via Teams

Date of meeting: 20th May 2021

Present Board Members: Sir David Henshaw, (Chair)
Clare Pillman, Chief Executive
Prof Steve Ormerod, Deputy Chair
Catherine Brown
Julia Cherrett
Geraint Davies
Howard Davies
Dr Elizabeth Haywood
Zoë Henderson
Dr Rosie Plummer
Prof Peter Rigby

Present Executive Team Members: Prys Davies, Executive Director of Corporate Strategy and Development
Ceri Davies, Executive Director of Evidence, Policy and Permitting
Rachael Cunningham, Executive Director of Finance and Corporate Services
Gareth O'Shea, Executive Director of Operations
Sarah Jennings, Executive Director of Communications, Customer and Commercial

Additional Attendees Present: Colette Fletcher, Head of Governance & Board Secretary (All items)
Mike Evans, Head of South Wales Central Operations Item 8
Aneurin Cox, Operations Manager Land and Assets Item 8
Andy Robinson, Team Leader, People and Places South Central Item 8
Tim England, Operations Manager (Flood and Water Management) Item 8
Scott Squires, Projects and Programme Delivery Manager Item 8
Fiona Abbott, Team Leader, Radioactivity and Industry Policy Item 8

Observers: Sue Nolan, Assistant to the Head of South Wales Central Operations Item 8
Mark Petherick, Team Leader and Executive Assistant to the Chief Executive
Gareth Wardell
Huw Thomas – 9.30 to 11.30

Declarations: Dr Rosie Plummer – Pembrokeshire Coast National Park Authority Board Member; Member of Welsh Mills Society
Howard Davies – Chief Executive of the National Association of Areas of Outstanding Natural Beauty

Apologies: Karen Balmer

Secretariat: Natalie Williams
Jocelyn Bengier
Rhiannon Spencer

Item 1. Open Meeting

1. The Chair opened the meeting and welcomed everyone. Declarations of interest were made during the course of the meeting as noted above.

Item 2. Review Minutes and Action Log

2A. Review Minutes from Public 24th March meeting

2. The minutes from the public March meeting were reviewed and agreed subject to minor amendments.

2B. Review Public Action Log

3. The action log was reviewed and agreed and updates were provided.

Item 3: Update from the Chair

4. The Chair reflected on the recent elections and change in ministerial portfolios and welcomed the emphasis placed by the First Minister and new Welsh Government (WG) on the climate and environment. The Chair and Chief Executive had written to the two new Ministers for Climate Change and work would continue with Lesley Griffiths on Rural Affairs. The Chair had also written to the new Ministers on behalf of the Green Recovery Group.
5. The recruitment process for the new Board members had been a successful campaign with more than 130 applications received and interviews scheduled for the next month.
6. The recent BBC Panorama programme regarding river pollution had been considered at internal meetings. It was proposed that a water summit should be held involving Ofwat, the water companies and WG on the issues raised and this would be discussed further at the Board meeting in July.

Item 4: Chief Executive's Report

7. The Chief Executive provided an overview of the results of the recent WG elections and the outcomes relevant to NRW were presented. The Chair and Chief Executive would be writing to Vaughan Gething on the Green and Just Recovery and working to continue relationships in this area. The creation of the new Climate Change Ministry was discussed. Lesley Griffiths would continue to lead on crucial items for NRW and the farming sector.
8. The Labour manifesto was shared. Important legislation such as the Clean Air Act, a ban on single use plastics and the Agriculture Bill were expected. The creation of a new National Park was being considered and it was noted that this would be a major piece of work for NRW. This designation would be welcomed but the condition of habitats would need to remain the focus of work.

9. The level of ambition and desire to make a difference was welcomed and an early approach to Ministers was planned. Funding would be key to delivering on the ambitions. The Programme for Government would be published in early June and work would take place to align the Business Plan with WG plans. Engagement would continue over the next month and a date had been secured in October for an event in the Senedd to time with the UN Climate Change Conference (COP) and 2050 Vision work.
10. The areas of focus for the coming year were noted as the Agriculture Bill and water quality. The Climate and Nature Emergencies were noted as linked and emphasis placed on considering them together as part of the same issue. Targets and achieving the right action plan for Nature Recovery would be needed with a good evidence base provided by SoNaRR.
11. Flooding had been an important election issue. In 2020/21, the total budget for flood risk management had been spent along with the additional funding received to protect a further 720 properties. Additional revenue funding for flood of £1.25m for this financial year alongside a £17m capital fund from WG would enable the preparation and construction of projects across Wales to move forward in addressing the ten key areas identified in the Flood Review. There was a need to discuss the clear recommendations from the Flood Review with Ministers and set the direction of conversations with communities affected by flooding to develop resilience.
12. The commitment to a new National Forest and improvements to woodland was welcomed and the Regulation team had been strengthened to deal with the increased funding for Glastir projects. The importance of investment in peatland restoration and blue carbon as methods of carbon capture in addition to trees would continue to be highlighted with WG. The pressure on the Welsh Government Woodland Estate (WGWE) for its multiple benefits ranging from recreation to the foundation economy and challenges around the balance going forward were noted.
13. Board members discussed the Chief Executive's Report. It was confirmed that work on the Business Plan would be ongoing as soon as the Programme for Government and Remit Letter were received and an update would be provided in September. It was noted that prioritisation of the actions would be key, although funding confirmation was likely to be confirmed at a later date.
14. The increases in budget for Natural England, the Environment Agency and Forestry Commission were noted and the value of cross border working was highlighted. NRW's role in the creation of the new National Park (NP) was queried and it was clarified that NRW acted as principal advisor to WG on NPs and it was considered that this would provide an opportunity to generate debate on habitat restoration and condition. The lack of resource to support the development of a new NP would be raised with WG.
15. The proposed designation of inland waters for recreation and the possible conflict of marine renewables were raised as potential issues in relation to quality of habitats. It was confirmed that there was no information yet on the scale of designation. The subject of water quality was due to be considered at the next Board meeting and it was confirmed that discussions had been commenced with WG on water policy.
16. The Government focus and commitment on delivery and the implications for NRW and Non-Governmental Organisations (NGOs) was recognised. The difficulties faced by some organisations in submitting funding applications was discussed and the report on recommendations for improvements to the process produced by the Green Recovery

Group was noted. Collaborative support was recognised as key in working to support successful delivery.

17. Areas of potential duplication of function were discussed and it was agreed that this should be considered further and the outcome of the Baseline Review would facilitate this discussion.

Item 5: Update Reports of Committees

18. The report from the Audit and Risk Assurance Committee (ARAC) held on 22nd April 2021 was taken as read and the Chair of ARAC welcomed any questions or comments. The Audit report on the inspection and management of colliery spoil tips was discussed and it was agreed that this report should be shared with the full Board for information. The Leadership Development programme performance and monitoring, and its links into workforce planning were queried. The Chief Executive confirmed that a new programme supported by Academi Wales was in progress, which would be supplemented by group learning and building on compliance culture and accountability. The Executive Director of Corporate Strategy and Development would provide a summary on this to Board members and its fit with workforce planning and staffing development.

ACTION: The Chief Executive to share the Audit report to ARAC on the inspection and management of colliery spoil tips with the Board.

ACTION: The Executive Director of Corporate Strategy and Development to provide a summary to Board members on the Leadership Development programme and its fit with workforce planning and staffing development.

19. The Finance Committee (FC) report on meetings held on 20th and 29th April 2021 was taken as read. The Chair of the FC confirmed that the Terms of Reference were in the progress of being agreed to incorporate the two Task & Finish Groups but Timber would be kept under review and a formal note on assurance requested. Catherine Brown thanked FC and the Finance team and noted the progress made on spend and forecast and requested information on plans relating to the area of value for money. It was confirmed that this would become a core part of the Terms of Reference and that the Baseline Review and work on the Three Lines of Defence would ensure this was covered.
20. The Flood Risk Management Committee (FRMC) report from 23rd April 2021 was taken as read. The Chair of FRMC highlighted that the Flood Recovery and Review Implementation Programme was due to go through the internal audit process in Quarter 2. The final budget spend for the Flood Capital Programme was confirmed as £13.5m. Planning approval had recently been received for the Llyn Tegid flood scheme. The Toddbrook Report had been published and included 15 headline recommendations for the Department for Environment, Food and Rural Affairs (Defra). FRMC would review the report by September and incorporate some of the recommendations into NRW's biannual report on reservoir safety.

Item 6: Annual Review of Terms of Reference

Colette Fletcher, Head of Governance and Board Secretary

21. The Head of Governance and Board Secretary presented the item and noted that following a significant review of the Terms of Reference last year, minimal changes were proposed for this year. Changes were highlighted to the Board regarding the wording relating to the Sustainable Management of Natural Resources (SMNR), quoracy for Board Committees, and cyber security.

22. Board members welcomed the professional approach to Board governance and acknowledged the progress made in this area. The change in the wording relating to SMNR within the Board Committee Terms of Reference was discussed and it was agreed that this should be amended slightly for additional clarity whilst remaining within the legal framework. The Terms of Reference would also need to be updated to reflect the recent changes in WG ministerial arrangements.

APPROVED: The Terms of Reference for the Board, Board Committees and Executive Team were approved subject to minor amendments.

Item 7: Changes to the Statutory and Legal Scheme of Delegation

Colette Fletcher, Head of Governance and Board Secretary

23. The Head of Governance and Board Secretary presented the paper and highlighted the changes requested by the Natural Resources Management (NRM) Business Board to delegate authority for sign-off of consultation responses based on a three-level risk approach.
24. The Board considered and approved the changes.

APPROVED: The Board approved the changes to the Statutory and Legal Scheme of Delegation requested by the NRM Business Board.

Item 8. Place Presentation

Presenters: Mike Evans, Head of South Wales Central Operations

Aneurin Cox, Operations Manager Land and Assets, Andy Robinson, Team Leader, People and Places South Central, Tim England, Operations Manager (Flood and Water Management), Scott Squires, Projects and Programme Delivery Manager, Fiona Abbott, Team Leader, Radioactivity and Industry Policy

25. The Executive Director of Operations welcomed the South Wales Central Team and introduced the item, highlighting the uniqueness and diversity of the area. The Head of South Wales Central opened the presentation noting that although only 6% of the area of Wales, South Wales Central incorporated 29% of the population. The Area Statement focused on building a bridge between the urban and natural environment but pressures from flooding and population were highlighted and the focus by WG on the growth agenda was challenged and debate had been created to move discussions towards prioritising the environment.
26. Team members presented an overview of the issues and challenges in the area. The topics included: flood risk management and projects in densely populated areas and the management of public and political expectation; land and asset management particularly in relation to woodland and neighbour engagement both positive and negative; the challenge of regulating and maintaining water quality in heavily populated and industrial areas; working with partners to connect people with places and create a healthy and resilient environment.
27. Board members thanked the team for an engaging and informative presentation. Discussion took place around some of the key issues relating to flooding and development of land. It was recognised that difficult conversations would be needed with communities and political partners on building resilience and engagement with the outcome of the Flood Report. It was agreed that the Board appetite for challenge on

future land development schemes should be included for discussion at a future Board meeting.

ACTION: Secretariat to add Board appetite for challenge on future land development schemes to the Board forward look for discussion at a future Board meeting.

28. The contrast between the effects of plastic pollution in some rivers and ecosystem recovery in others was noted. The challenge to effectively communicate the success of schemes to promote change was discussed. The diversity of the population was considered and the importance of working with partners on education and building relationships with different communities was noted. Effective communication, education and engagement were key themes of discussion by Board members and it was noted that the education budget may need to be revisited. The use of an evidence-based approach using a variety of methods for communication and engagement was considered.

29. It was noted that the Place presentations had produced themes that could be applied across the organisation particularly around education and engagement with communities. It was agreed that there should be reflection within the Operations Team and an item brought to a future meeting for the Board to consider the developing themes from the Place presentations.

ACTION: The Operations Team to bring an item to a future Board meeting for Board members to consider the developing themes from the Place presentations.

- Board meeting closed -

Item 10. Public Q&A Session

30. The Chair invited questions from the public.

31. Gareth Wardell made observations on the limitations of the ability of NRW to meet targets set by Welsh Government without the necessary funding in place. Mr Wardell also gave the opinion that NRW would only make progress on the Climate and Nature Emergencies when Government scaled up to a massive reduction in the consumption of high carbon inputs into goods and services, in particular, by targeting high income earners.

- Public Meeting closed -

Board Meetings

Action No.	Meeting Category	Meeting Date	Item No	Para No	Paper Sponsor	Action	Owner	Due	Status	Notes/Updates
9	Public	26/11/2020	6	20	Prys Davies, Director of Corporate Strategy and Development	ACTION: Executive Director of Operations to discuss with Head of North East Wales Operations having a future discussion with the Board on the 4-hour limit on incidence response.	Gareth O'Shea, Executive Director of Operations South	20/12/2020	Ongoing	Added to the list of potential strategic discussion items, Place presentations, Evidence sessions and site visits
10	Public	26/11/2020	8	31	Gareth O'Shea, Executive Director of Operations South	ACTION: Head of South West Operations to provide a note to the Board on new innovations/ technologies/ ways of working used that have helped the operations teams during Covid.	Gareth O'Shea, Executive Director of Operations South	20/12/2020	Ongoing	e-mailed Martyn
13	Public	20/01/2021	7	29	Clare Pillman CEO	Secretariat to arrange a Board visit to the Gwent levels in the future.	Secretariat	16/06/2021		Covid dependant / face to face meetings not till after May. Has been added to the list of potential strategic discussion items, Place presentations, Evidence sessions and site visits
24	Public	24/03/2021	4	10	Clare Pillman CEO	ACTION: Secretariat to canvass availability for a Board Development Day in July to focus on reflection and future challenges post-Covid.	Secretariat	28/06/2021	Ongoing	Board Development Day availability now being sought for a date in October
27	Public	24/03/2021	8	29	Gareth O'Shea Executive Director Ops	ACTION: Secretariat to coordinate a North East site visit for Board members centred around the DeeLIFE project in combination with the next Board meeting to be held in the North East area.	Secretariat	22/09/2021	Completed	A virtual site meeting took place between Board members, staff and stakeholders on the DeeLIFE project and Pengwern Vale
28	Public	24/03/2021	10	39	Rachael Cunningham Executive Director finance	ACTION: The Renewal Programme to be revised to include the amendments as discussed by the Board and to develop target setting and programme management prior to return to a future meeting.	Ben Wilson, Senior Programme Manager - Covid	22/06/2021	Completed	The renewal programme, in liaison with the PMO, has initially submitted a programme definition document to the iPAG, which granted gateway 0 approval. Subsequently the revised programme board has overseen the development of a various workstreams, and approved their project approach and draft targets. These workstreams targets will in turn inform the Renewal (now called Adfwyio) programme Business justification case, to be scrutinised by the programme board and iPAG. Updates have been provided to PaRC and ET.
29	Public	24/03/2021	13	44	Prys Davies Executive Director CS&D	ACTION: The Executive Director of Corporate Strategy and Development to ensure that the Board have access to the neurodiversity training.	Rachael Holbrook/Steve Burton - Head of People Management	28/04/2021	Ongoing	The Executive Director of Corporate Strategy and Development confirmed that a neurodiversity training session was being prepared with the training provider and would be advertised to Board members before the July meeting
30	Public	24/03/2021	14	49	Gareth O'Shea Executive Director Ops	ACTION: The Head of Governance and Board Secretary to ensure that future Board papers have an EqlA where appropriate.	Colette Fletcher Head of Governance & Board Secretary	28/04/2021	Ongoing	To be reviewed following May Board

Board Meetings

Action No.	Meeting Category	Meeting Date	Item No	Para No	Paper Sponsor	Action	Owner	Due	Status	Notes/Updates
52	Public	20/05/2021	5	18	Sir David Henshaw	ACTION: The Chief Executive to share the Audit report to ARAC on the inspection and management of colliery spoil tips with the Board.	Clare Pillman CEO	22/06/2021	Completed	e-mail sent 09.06
53	Public	20/05/2021	5	18	Sir David Henshaw	ACTION: The Executive Director of Corporate Strategy and Development to provide a summary to Board members on the Leadership Development programme and its fit with workforce planning and staffing development.	Prys Davies Executive Director CS&D	22/06/2021	Completed	A summary of the Leadership development programme, Ymlaen, was provided at the June Board update call.
54	Public	20/05/2021	8	27	Gareth O'Shea Executive Director Ops	ACTION: Secretariat to add Board appetite for challenge on future land development schemes to the Board forward look for discussion at a future Board meeting.	Secretariat	31/08/2021	Ongoing	Added to Board Forward Look for September
55	Public	20/05/2021	8	29	Gareth O'Shea Executive Director Ops	ACTION: The Operations Team to bring an item to a future Board meeting for Board members to consider the developing themes from the Place presentations.	Gareth O'Shea Executive Director Ops	31/08/2021	Ongoing	Added to Board Forward Look for September



Board Paper

Paper Title:	Finance Committee Update
Paper Reference:	21-07-B10
Paper Sponsored By:	Sir David Henshaw - Interim FPPC Chair
Paper Presented By:	Sir David Henshaw

Purpose of Paper:	Information
Recommendation:	To note the update

Issue

1. This paper provides an update to the Board following the Finance Committee (FC) meeting on 18 June 2021.

Update

Annual Report and Accounts 2020-21

2. FC met specifically to review the Performance section of the Annual Report and Accounts. The Committee welcomed the tone and clarity of the report and requested minor amendments be made to the Chair's foreword and Chief Executive's statement.
3. The Committee were content with the Performance Report subject to the amendments being made and noted that the final version of the Annual Report and Accounts would be presented at the July Board meeting for approval.

Other business

4. The Committee have requested an interim report on the evidence that is emerging from the Baseline Exercise at the next general FC meeting on 16 July 2021.

Board Paper

Paper Title:	People and Remuneration Committee (PaRC) Update
Paper Reference:	21-07-B11
Paper Sponsored By:	Zoe Henderson - PaRC Chair
Paper Presented By:	Zoe Henderson

Purpose of Paper:	Information
Recommendation:	To note the update

Issue

1. This paper provides an update to the Board following the PaRC meeting on 17 June 2021. The minutes from the meeting can be made available to any Board member interested.
2. Issues that in the opinion of the PaRC Chair should be brought to the attention of the whole Board are highlighted below.

Update

Interim Wellbeing, Health & Safety (WH&S) Update

3. PaRC were updated on the recent legal changes to unlawful killing which had wide ranging implications in relation to workplace deaths and the two fatal incidents on the Welsh Government Woodland Estate were discussed.
4. Other updates included the Corporate Health Standard assessment, WH&S webinars and the further initiatives taking place on key wellbeing issues.

Forestry Safety Project Closure report

5. PaRC were updated on the key issues and developments in the Forestry Safety Closure Report which had been initiated following a fatality. Several priorities for improvement had been identified and delivered and the Project had been closed to ensure these were embedded as business as usual activities. Risk appetite was discussed and there would be a further discussion outside the meeting about the issue of the normalisation of risk.

Management information

6. PaRC were provided with an overview of Management Information, which included: staffing levels had increased slightly but had now stabilised and the WH&S and sick absence statistics had reduced overall, but noted stress was the highest proportion of the figures.

Annual Remuneration Report

7. The Annual Remuneration Report was considered and endorsed by PaRC.

Renewal

8. PaRC were provided with an update on the shift from the discovery phase to the delivery phase. There was a discussion about the working options provided to new starters and the indicative results of the recent survey.

People Strategy and Workforce Plan

9. PaRC reviewed and discussed both strategies and were generally content with the approaches suggested. PaRC agreed that there should be separate documents with different audiences in mind.

Workforce Resource Management

10. PaRC were updated on history of the issues, the measures put in place, and the future measures proposed to achieve tighter controls over recruitment. PaRC advised that the tighter controls should not be released too soon.

(Equality), Diversity and Inclusivity

11. Diverse Cymru had been used as an external challenge and had submitted their stage one report. The information from the Report was now being used for an internal Task and Finish Group which was being set up to identify objectives and a plan for the next three years.
12. There was also a discussion about how to engage and provide opportunity for the whole Board to be involved in EDI and for it not to feel exclusive to the members of PaRC.

Welsh Language Annual Report

13. PaRC reviewed and endorsed the Welsh language Annual Report. Other matters raised included promoting a positive bilingual culture in NRW, and ways of encouraging more use of Welsh on social media.

Review of changes to People Management Risks

14. The risks that had been updated since the last PaRC were outlined and included the impact of financial constraints, service resilience, failure to reflect the communities that we serve. PaRC agreed with the focus of the paper.

15. A further risk had been identified in relation to the extent NRW had adequately trained staff involved in incident management across the organisation.
16. There was a discussion around retention of staff, especially in business-critical roles and how this could be influenced through management style. PaRC endorsed the paper and the Strategic Capability Risk would now go back to Executive Team for endorsement.

Customer Experience Strategy Update

17. A six-month update was provided to PaRC on the Customer Experience Strategy. The benefits of developing the Customer Relationship Management system were discussed and would facilitate the use of stakeholder information in line with GDPR and metrics for customer interaction to ensure value for money.

Performance Management Internal Audit

18. This linked with other discussions at Board and Board committees that there was a need for managers to actively monitor and test actions to ensure feedback and development of the controls in place.
19. The longer-term strategy towards performance management was also being developed and a paper outlining the changes would be going to ET in July and would be brought back to PaRC to discuss later this year.

Board Paper

	Paper Details
Paper title:	Performance Report 2020/21 - Quarter Four
Paper Reference:	21-07-B12
Paper sponsored by:	Clare Pillman, Chief Executive
Paper Presented by:	Executive Team
Purpose of the paper	Scrutiny
Recommendation	<p>The Board is requested to scrutinise NRW performance for the fourth quarter of 2020/21 and specifically consider:</p> <ul style="list-style-type: none"> • Progress against each measure reported on at year end and the actions NRW is taking

Issue

1. This performance report is based on the measures and targets that have been revised from Quarter 2 onwards as a result of the potential impact of Covid-19 on staff and their workloads. The report in Annex 1 sets out last year's Quarter 4 / end of year Business Plan Performance Dashboard for January to March 2021.

Background

2. The Business Plan dashboard report is one of the Board's principal ways of scrutinising our delivery.
3. The performance report (Annex 1) was developed as part of the process to prepare the 2020/21 Business Plan with the Board, the Executive Team and the Finance, Planning & Performance Committee of the Board. It was revised from Q2 onwards as a result of Covid-19 and was re-approved by the Board in September. Quarter 3 reporting was by exception, but Quarter 4 is again a full report.

4. The report format has undergone significant change since last year and consists of:
 - A **dashboard** providing an overview of performance against the 2020/21 measures set out by Strategic Priority as set out in the Business Plan.
 - A **table of strategic priorities and topics** to help navigate the report.
 - **Details for each measure** with year end position; those measures not reported on in Q3 are shown in the Q3 boxes for each measure in a lighter shade to differentiate them.
5. This is the final report against our Business Plan and Dashboard for 2020/21; it relates to our Corporate Plan to 2022, which will now run to 2023.

Assessment

6. We revised our Business Plan and Dashboard for Quarter 2 as a result of the impacts of Covid-19. For Quarter 3, the Board agreed that for this Quarter only we would report by exception– for those measures which were either Red or Amber at the end of Quarter 2 or predicted to be Red or Amber by year end. We have then prepared a full report for Quarter 4 / year end.
7. Our performance for all Quarters including Quarter 4 is summarised below:

	Quarter 1 (1 April – 30 June 2020)	Quarter 2 (1 July to 30 Sept 2020) Targets/ Milestones revised for Q2 onwards	Quarter 3 (1 October – 31 December 2020) By exception	Expected Year End (to 31 st March 2021)
Green	19	24	8	21
Amber	13	11	7	12
Red	3	0	0	2
Grey (not reported on in Q3)	0	0	20	0
Total	35	35	35	35

8. The Board is requested to scrutinise the performance report, noting the following:
 - Much of our work relies on partners who have quite rightly needed to redirect their work as a result of Covid-19. This includes for example, our work with Welsh Government (WG) in several areas, and assessment for the Gold Corporate Health Standard.
 - Many of our staff have home schooling and caring responsibilities and as many as possible are still working at home.

9. Below we have briefly highlighted the findings from this report by Strategic Priority: details can be found in the report itself.

Responding to the climate emergency

- **Verification of Glastir Woodland Creation grant scheme applications** is now rated **Green**: We have completed verification for Expression of Interest (EOI) for Window 7 (27 applications covering 151.4 ha) and 8 (63 applications covering 367.2 ha) for Glastir Woodland Creation grants. We are now progressing the latest EOI Window 9 which is valued at £8m with an ambition to create 2,000ha of woodland. This sees an almost tenfold increase in funds available for woodland planting.

We are currently recruiting to the team to ensure we can satisfy the demand for verification: EOI 10 applications will follow in the coming months.

- **Area of new woodland created on the NRW Estate (ha acquired/identified if already in ownership and ha planted)** is now rated **Amber**. We have planted the target of 60ha of woodland and secured 82ha of new planting, missing the 150ha identified target making us Amber at year end. We will now continue to secure land in Q1 to create the planned 150ha of new woodland in 2021/22 and to achieve a further 150ha secured for planning in 2022/23.
- **Actions undertaken to restore Welsh peatlands** continues to be rated **Amber**. Our milestone for year end was to have 70% of programmed groundworks delivered through NRW direct delivery and up to 50% of the activities of partners. The target is to deliver 600ha of peatland restoration activity this year which we have surpassed - delivering 776ha in total. 100% of groundworks programmed by partners has been delivered - however we are Amber at year end due to 50% of groundworks delivered on the NRW estate. Unfortunately, delivery of groundworks was hampered by a combination of staff turnover, limited contractor availability and the impact of Covid-19 restrictions.

Responding to the nature emergency

- **Priority actions undertaken on protected sites to improve condition of features is now rated Red**. Our target for year end was to have **80% of actions completed or underway**: however, 50% were underway or complete by the end of Q4. Disappointingly, we are **Red** at year end. During the autumn/ winter, Covid-19 restrictions continued much longer than originally anticipated, affecting the necessary face to face negotiations and site visits needed to secure the Management Agreements key to this area of work. Initially optimistic, in hindsight this re-tightening of the restrictions should have led to us alerting the issue earlier. As restrictions continued, the target could not be recovered. We have learned lessons for 2021/22.

We are keen to improve our performance. Having retained WG funded Fixed Term staff and developed better integrated work programmes, we are in a better

position to deliver the WG funded programme for protected sites in 2021/22. We will work with our Land Management Agreement (LMA) customers to deliver further improvements; balancing customers' needs with a compliant process. To secure adequate core resources to deliver our statutory functions for protected sites, we are working with WG to secure a multi-year (3 year) programme to support the continued delivery of this work in Wales.

- **Actions undertaken on National Nature Reserves on NRW managed land to improve condition and features** is currently **Amber**. We have delivered 79% of planned actions by year end within 7% of target, unfortunately this is not the 85% we were on track to deliver at Q3 therefore making us Amber at year end. This means we have delivered 264 actions across 55 NNRs and spent £850k on key conservation management and infrastructure works. The primary reasons for actions that were not delivered was the result of several survey and monitoring projects being deferred, as well as staff time.
- **Number of UKWAS Major Corrective Action Requests (CARs)** is currently **Green**. Our key activity for this period was to progress the closure of Corrective Action Requests (CARs) and Observations arising from the 2020 UK Woodland Assurance Standard (UKWAS) audit, and for fewer of these to be opened at the next audit. We have closed the single major CAR. There are 4 minor CARs and 6 Observations open at the end of this reporting period, and we have closed out one Observation during this reporting period. We will now continue to progress the closure of the remaining open CARs and Observations and prepare for the 2021 audit.
- **Number of Water Framework Directive (WFD) investigations completed** is now rated **Green**. Our year-end target was to deliver 505 completed WFD investigations which we have now achieved. In Quarter 4 we have completed 170 investigations and delivered 515 in total over 2020/21. We will now continue to programme the investigations throughout the new financial year to meet future targets as they arise. Some investigations will require outputs from the 2021 classification when completed, which has been delayed.

Developing and using our evidence with partners to advocate for and deliver SMNR

- **Creating a shared vision for the natural environment for 2050, building on our work for Green Recovery** is rated **Red** for this Quarter. Our milestone for this quarter was to begin initial 2050 Vision engagement sessions. Unfortunately, we have not completed this activity as we were advised by the Vision 2050 Programme Board to review the feasibility of starting the national conversation events due to the introduction of Covid-19 lock down restrictions. Initial 2050 Vision engagement sessions will begin in October 2021.

Developing NRW into an excellent organisation that serves the communities of Wales

- Our **response to 'high category' incidents within four hours** is currently **Amber**. We have not achieved our year-end target of response to 95% of initial 'High Category' incidents within four hours. In Q4 response to high category incidents has taken place within four hours for 87% of incidents. We have seen performance over the last 12 months range from 79% to 95%, having set ourselves the ambitious target of 95% for each Quarter, with a cumulative total for the year of 89%. We intend to review the target for this measure in 6 months' time, looking at the evidence around what performance percentage is achievable for this measure and how it can be benchmarked.
- **Develop our NRW workforce plan, progressing priority actions** is rated **Amber**. We have not completed our year end milestone activity due to funding issues, leaving us at Amber at year end. However, we have now received approval to proceed with the creation of a Placements team which we will begin recruiting for in June 2021.

Responding to the Covid-19 pandemic and the UK Leaving the European Union, taking opportunities for a green recovery

- **NRW's contribution following EU Exit including milestones on: Transfer of functions; Environmental Principles, governance and the new oversight body, and; New legislation** is rated **Green**. We provide monthly updates to our CEO, NRW Board and our Executive and Leadership Teams on EU Exit issues. This is a multi-year activity to monitor and respond to any opportunities, risks and impacts arising due to EU Exit. We will continue to manage this transitional programme of work, responding to key issues and work over the next year - monitoring and responding to risks, impacts and opportunities as they arise and embedding this work into our business as usual work.
- **Implement Covid-19 Renewal programme** is rated **Green**. We have met our milestone for this activity period which was to begin to implement recommendations. We have concluded the discovery phase of Renewal, having completed several evidence gathering exercises. We have also established a clear vision and set out outcomes we want to achieve as NRW as society emerges from the pandemic. These have been reviewed, amended and agreed with various groups, including our NRW Board. The renewal programme will be recommending a series of actions and proof of concept trails that will start NRW's transition to a new way of working and will seek to secure benefits including staff wellbeing, productivity and much more.

Recommendation

10. The Board is requested to scrutinise and agree the performance report for Quarter 4 prior to publication.

Key Risks

11. If the performance information provided does not accurately reflect progress towards delivery of the Business Plan, then the Board will be unable to fulfil their role to scrutinise NRW's delivery.
12. If we are further affected by Covid-19, the implications of EU Exit and extreme weather events, staff may be completely overstretched, and we will have reduced capacity to respond.

Next Steps

13. The performance report will be discussed with Welsh Government and submitted to the Minister of Environment, Energy and Rural Affairs. It will be published on the Natural Resources Wales website.

Financial Implications

14. There are no significant financial implications in providing the performance report itself, however part of our quarterly review obviously considers allocation of our resources and finance and performance papers are therefore closely linked.

Equality Impact Assessment (EqIA)

15. The relevant Equality Impact Assessment covers our Well-being Statement, Business Plan 2020/21 and Corporate Plan up to 2022, and was updated in March 2021.

Index of Annexes

Annex 1 – Quarter 4 Business Plan Performance Dashboard

Annex 1: Business Plan Performance Dashboard to Quarter 4

Respond to the Climate Emergency

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Area of new woodland created on the NRW Estate	Amber	9
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Respond to the Nature Emergency

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Progress of our work to reduce pollution from metal mines	Amber	31
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Developing and using our evidence with partners to advocate for and deliver SMNR

Measure	Year end	Page
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Publish State of Natural Resources Report 2	Green	37
Use of Area Statements within NRW, informing priorities through joint working	Green	39

Developing NRW into an excellent organisation that serves the communities of Wales

Measure	Year end	Page
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Review our Equality Impact Assessment process	Green	49
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Progress customer programme – increasing customer involvement	Green	54
Review and define all funding mechanisms available to NRW, ensuring alignment	Amber	55
Publish NRW Commercial Strategy	Green	57
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Responding to the Covid-19 pandemic and the UK Leaving the European Union, taking opportunities for a green recovery

Measure	Year end	Page
NRW's contribution following EU Exit	Green	61
Progress of NRW's preparedness for any potential incidents or issues following EU Exit	Green	63
Implement Covid-19 Renewal programme	Green	64

Key to Red / Amber / Green performance assessment: [see page 65](#).

Priorities and Topics: We have structured our [NRW Business Plan](#) around five priorities and 21 topics. This report summarises recent progress by topic, and performance in relation to the measure/s for each topic. Direct links below:

Respond to the Climate Emergency	Respond to the Nature Emergency	Developing and using our evidence...	Developing NRW into an excellent organisation...	Responding to the Covid-19 pandemic...
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Creating New Woodland (page 7)	Protecting Habitats and Species... (page 18)	Improving and presenting evidence... (page 36)	Benefitting Communities (page 44)	Being Ready for Change (page 62)
Restoring Peatland (page 10)	Managing Land Sustainably (page 22)	Work with Partners and communities using Area Statements (page 38)	Developing our Organisation (page 47)	
Managing Flood Risk (page 12)	Managing the Sea Sustainably (page 25)		Well-being, Health and Safety (page 50)	
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Priority: Respond to the Climate Emergency

Our NRW Business Plan sets out the following topics in relation to this priority:

- [Reducing our Carbon Footprint](#)
- [Creating New Woodland](#)
- [Restoring Peatland](#)
- [Managing Flood Risk](#)

The following pages reflect recent progress for each of those topics, along with the latest performance position in relation to the Business Plan dashboard measure/s for each topic.

Topic: Reducing our Carbon Footprint

Topic summary progress (i.e. overview of work undertaken against this topic):

- **NRW direct emissions:** During the first three quarters of the last year, due to the global pandemic, emissions reduced by 38% based on the same period in 2019/20. The impact of increased homeworking on NRW's emissions has been calculated and key lessons will be fed into our pandemic recovery plans.
- **Welsh Government organisational carbon reporting guidance:** We have provided input into the guidance which is based on the model developed by the NRW Carbon Positive Project. This guidance is due for publication later this year.

Topic owner/s: Ruth Jenkins / Rhian Jardine

Business Plan dashboard measure/s for this topic:

- **Climate emergency action across NRW:** The measure will help us understand how we're doing to meet the 2030 carbon neutral ambition for the public sector, and in delivering our role as exemplar and support body for the wider public sector. The measure includes reporting on actions undertaken to reduce our carbon footprint in our buildings and transport and that we need to develop our carbon reporting in light of emerging Welsh Government guidance.

Measure: Climate emergency action across NRW

Latest position (to end of March 2021):

- Our year end milestone for this measure was to **report on implementation of the programme**
- Advice for the development of low carbon pathways for our buildings and fleet have been commissioned to inform the ongoing fleet and accommodation reviews. We have developed a forward look for the decarbonisation of procurement, based on framework case studies undertaken this year and the results of a spend based emissions analysis for 2020/21. We have developed options for internal Carbon Literacy training. We have installed two solar Photo Voltaic schemes and added 9 electric vehicles (EVs) to the fleet bringing the total number of EVs to 44, which is 8% of the fleet. Our progress in delivering the programme has been constrained by financial and staff resources. We were unable to rollout a comprehensive EV charging infrastructure as it was not funded in the budget: we will continue to look for funding and develop resources to deliver this aspect of the action plan. Woodland creation and Peatland restoration programmes are delivering increased sequestration and reduced emissions (reported elsewhere).

What are we doing next:

- Work to learn the lessons and implications for organisational emissions from the Covid-19 pandemic. We will develop costed plans for decarbonisation of fleet, buildings and procurement including opportunities for external/internal 'invest to save' funds. We will trial Carbon Literacy training to drive further organisational change. We will also further develop the evidence and tool to deliver actions within our climate change and decarbonisation programme and build business decarbonisation into our Renewal programme.

Measure owner/s: Ruth Jenkins / Rhian Jardine

Q1	to Q2	to Q3	Year end
Amber	Amber	Green	Amber

See [here](#) for key used for Red / Amber / Green status
(for all Business Plan dashboard measure reports)

Topic: Creating New Woodland

Topic summary progress (i.e. overview of work undertaken against this topic):

- The Woodland Creation programme has developed 8 themes (including our Glastir verification work). Progress adjustments have been made in year for some projects to focus limited resources on key priorities. We continue to work with others on innovative projects and mechanisms to support woodland creation and tree planting in Wales. The Glastir Scheme is still the main mechanism for supporting new woodlands.
- NRW has completed verification on all of Expression of Interest (EOI) Windows 7 (25 schemes covering 152 ha) and 8 (63 schemes covering 367 ha) and is now progressing the latest EOI Window 9 (213 schemes expected over 2 years). This sees an almost 10 fold increase in funds available (to £8m) for woodland planting. To deal with this we are recruiting to the team and to supporting services across NRW to ensure we can satisfy the demand: EOI 10 applications will follow in the coming months. This too sees a major increase in funding available for woodland planting.

Topic owner/s: Ruth Jenkins / Martyn Evans

Business Plan dashboard measure/s for this topic:

- **Verification of Glastir Woodland Creation grant scheme applications:** NRW works with the sector and Welsh Government to verify applications from Woodland Agents and Land Owners who have applied for Glastir Woodland Creation and Woodland Restoration grants. This work ensures the applications are in line with the UK Forestry Standard and so Welsh Government can be confident that, when confirming the grants, the proposed woodland creation/restoration is for quality assured work. This leads to better management of existing woodland and expansion of woodland cover in Wales. Both are key Climate Mitigation controls for Wales.
- **Area of new woodland created on the NRW Estate (ha acquired / identified if already in ownership and ha planted):** shows the contribution of NRW's land estate to woodland creation and progress on the commitment to the WGWE being girded in 25 years than it was in 2018.

Measure: Verification of Glastir Woodland Creation grant scheme applications

Latest position (to end of March 2021):

- NRW has completed verification of a further 14 applications covering 34.6 ha. The running total of verification for Woodland Restoration grants this Financial Year stands at 102 applications covering 519 ha Woodland Restoration.
- We have completed verification for Expression of Interest (EOI) Windows 7 (27 applications covering 151.4 ha) and 8 (63 applications covering 367.2 ha) for Glastir Woodland Creation grants.
- We are now progressing the latest EOI Window (9) valued at £8m with an ambition to create 2,000 ha of woodland. This sees an almost 10 fold increase in funds available for woodland planting. To deal with this we are recruiting to the team and to supporting services across NRW to ensure we can satisfy the demand.

What we are doing next:

- EOI 10 applications will follow in the coming months. This too sees a major increase in funding available for woodland planting.

Measure owner/s: Ruth Jenkins / Martyn P Evans

Q1	to Q2	to Q3	Year end
Amber	Green	Green	Green

See [here](#) for key used for Red / Amber / Green status (for all Business Plan dashboard measure reports)

Measure: Area of new woodland created on the NRW Estate (ha acquired / identified if already in ownership and ha planted)

Latest position (to end of March 2021):

- Our target for this measure is **acquire 150 hectares of land and create 60 hectares of woodland** by year end.
- In 2019/20 we secured 60ha, explaining the target of 60ha woodland planted in 2020/21. The target of 150ha of land secured is the 2020/21 contribution to the current commitment to 350ha of woodland created over 10 years, which is to compensate for woodland removed for renewable energy installations.
- We planted the target 60 hectares of woodland and secured 82 hectares for new planting, missing the 150 hectares acquired / identified target. We are therefore Amber at year end.
- We investigated 30+ sites totalling c.1000 hectares, made and had several offers accepted, and progressed 3 acquisitions to the point of instructing solicitors. However, all fell through due to the vendors withdrawing late in the process for various vendor specific reasons during Q3 or Q4.

What we are doing next:

- We will continue to secure land in Q1 to create the planned 150 hectares of new woodland in 2021/22 and to achieve a further 150 hectares secured for planting in 2022/23. To mitigate the difficulty experienced in 2020/21 in open market purchase we will develop a bigger pipeline with a greater variety of mechanisms for acquisition.

Measure owner/s: Dominic Driver

Q1	to Q2	to Q3	Year end
Green	Green	Green	Amber

See [here](#) for key used for Red / Amber / Green status
(for all Business Plan dashboard measure reports)

Topic: Restoring Peatland

Topic summary progress (i.e. overview of work undertaken against this topic):

- This measure is progressing well, and we have exceeded the target for the end of year. Although not as much peatland on the Welsh Government / NRW estate was restored as planned we have still exceeded the target by supporting work on third party land through grants and land management agreements. Work is now progressing for year 2 including an agreed programme of work on the Welsh Government / NRW estate. As well as the work reflected in the measures there are also other key peat restoration projects to highlight:
 - The LIFE Welsh Raised Bogs project continues to make good progress in its aim to restore seven of the very best examples of raised bogs in Wales.
 - NRW is also involved in supporting a Heritage Lottery funded project that will restore large areas of degrading peatland in South Wales and in combination with the Pen y Cymoedd Wind Farm habitat project is one of the UK's largest habitat restoration projects.

Topic owner/s: Ruth Jenkins

Business Plan dashboard measure/s for this topic:

- **Actions undertaken to restore Welsh peatlands:** This measure reflects actions taken to restore Welsh peatlands across Wales, including on the NRW woodland estate (the Welsh Government Woodland Estate). The peatlands of Wales support an outstanding biodiversity resource. The 90,995 ha of deep peat (with 11,345 ha on the NRW estate) also play an important role in regulating greenhouse gas emissions, with the peat profiles comprising our most important store of carbon nationally. Degraded peat is a source of current greenhouse gas emissions. We are embarking on a national programme of peatland restoration across Wales to ensure their ongoing sustainable management and in order to safeguard and recover their critical biodiversity resource, store carbon, reduce greenhouse gas emissions, and ensure that Welsh peatlands play their important role as a component of Natural Flood Risk Management in Wales.

Measure: Actions undertaken to restore Welsh peatlands

Latest position (to end of March 2021):

- Our milestone activity for year end was to have **70% of programmed groundworks delivered through NRW direct delivery on NRW managed estate and up to 50% of the activities of partners.**
- The National Peatland Action Plan (NPAP) annual target is to deliver 600ha of peatland restoration activity. This year we have surpassed this target delivering **776 ha** of peatland restoration activity against the 5 targeted priority restoration themes of the National Plan - peatland erosion, peatland drainage, sustainable management of blanket peats, sustainable management of lowland peats and the restoration of afforested peatlands.
- The NPAP has successfully spent £1.5M of WG allocated money on peatland restoration and project establishment in 2020/2021.
- **100%** of groundworks programmed by **partners** has been delivered. We are amber at year end due to **50%** of groundworks on the **NRW estate** against our target of 70%. Unfortunately delivery of groundworks on the NRW estate was hampered by a combination of staff turnover, limited contractor availability and the impact of Covid-19 restrictions.

What we are doing next:

- 2020-21 has been the first year of a 5 year peatland programme. 2021-22 will see this work progress, funding has been secured.

- Measure owner/s: Ruth Jenkins / Dominic Driver

Q1	to Q2	to Q3	Year end
Green	Amber	Green	Amber

See [here](#) for key used for Red / Amber / Green status
(for all Business Plan dashboard measure reports)

Topic: Managing Flood Risk

Topic summary progress (i.e. overview of work undertaken against this topic):

- Much work has been delivered through the year to manage flood risk, across the full range of our flood risk management activities and responsibilities.
- It has been a challenging year with much work in the aftermath of the February 2020 floods, plus more flooding incidents during the year and the challenges of working under Covid-19 restrictions.
- This is on top of our 'business as usual' activities including maintaining assets and building new ones, flood mapping and modelling work, flood forecasting and warning work, development control, community engagement and strategic planning work.

Topic owner/s: Jeremy Parr / Mike Evans

Business Plan dashboard measure/s for this topic:

- **Complete Natural Resources Wales' review of winter storms 2019/20 and report on implementation of recommendations:** The February floods left an estimated 2,500 properties flooded in communities across Wales and was one of the most significant floods in Wales since the late 1970s. The operational activity and the services NRW provide to the public were severely stretched during these events. There are significant lessons to be learnt, and a review into our internal performance is underway. The review will capture the key facts and data on the severity of the events, analyse NRW's performance, and identify key areas for improvement. We plan to develop options for implementation, with indicative costs (as far as possible)

Maintain flood risk assets in high risk systems at target condition: NRW owns and maintains over 3,900 flood risk assets which form part of the national flood defence infrastructure and provide benefit to 73,000 properties in Wales. As well as reducing the risk to life and providing protection to property and vital infrastructure, they also provide protection to several nationally and internationally designated sites such as SSSIs, SACs and SPAs. It is vitally important that these assets are maintained and perform to their required condition. This measure is for the assets in our high-risk systems being at target condition. A system is typically a sub-catchment or stretch of river, and a poor condition asset anywhere within the system can impact that location – it is only as good as its weakest link. Our target is 98%; reflecting the impact of the winter storms on our asset stock, and some of the repairs will take months to deliver.

Measure: Complete Natural Resources Wales' review of winter storms 2019/20 and report on implementation of recommendations

Latest position (to end of March 2021):

- Our milestone activity for this period was to **agree which costed options to implement, with Board and WG input.**
- This milestone was written at the start of the financial year, before the reports were started. The format of the reports was not as a series of costed options, but actions to deliver with indicative timeframes and indicative costs/resource implications. We have taken these actions and created an Implementation Programme and we are delivering this. Some actions are straightforward in scope and timeframe with little cost. Other actions are more complex, in scope, timeframe, options and costs. We have created the structure for delivery and a programme of work. Progress is being tracked through a Programme Board and through the Flood Risk Management Committee.
- The reports also included estimates of overall resource envelopes needed for delivery (60-70 FTEs and £2.5m approx.). We have received some additional revenue budget in 20/21 that has enabled us to progress some actions.
- We met milestones during the course of the year, including publishing the reports in October 2021.
- In Quarter 4 we moved further into the implementation phase, taking forward the recommendations and delivering actions within the Reviews. We are reporting Amber in Quarter 4 given the issues facing our ability to deliver, including staff capacity (as highlighted in the Review), ongoing flooding events and significant challenges in recruitment. We are reporting monthly on the status of the programme to our Programme Board and managing issues as appropriate.

What we are doing next:

- We will now continue to deliver our Implementation Programme in a project/programme management structure. We will track deliverables through to benefits realisation. Some actions are complex, requiring delivery over a medium/long timeframe, and some require additional resource.

Measure owner/s: Jeremy Parr / Mike Evans

Q1	to Q2	to Q3	Year end
Green	Green	Green	Amber

See [here](#) for key used for Red / Amber / Green status (for all Business Plan dashboard measure reports)

Measure: Maintain flood risk assets in high risk systems at target condition

Latest position (to end of March 2021):

- Our target for this measure is **to maintain 98% of flood risk assets in high risk systems at target condition**
- We are at 97.5% for Quarter 4, up from the Quarter 3 performance of 97.1%. The number of assets Below Required Condition (BRC) has decreased during Quarter 4 from 101 to 89. To reach the target, we need to have no more than 70 assets Below Required Condition.
- Whilst we continue to make good progress, Covid-related delays and the impacts of Storm Christoph on our assets in Quarter 4 mean we are Amber at year end.

What we are doing next:

- We have been implementing the action plan agreed by NRW Board (March 2020), following the Deep Dive into this measure. We have already seen improvements as a result of this work and will continue to work closely with the Operational teams to improve performance in line with the action plan.
- We are continuing to work on data quality improvements to make sure we are using the best available data to represent the condition of our FRM (Flood Risk Management) assets, and this work will continue into the new financial year.

Measure owner/s: Jeremy Parr / Mike Evans

Q1	to Q2	to Q3	Year end
Amber	Amber	Amber	Amber

See [here](#) for key used for Red / Amber / Green status
(for all Business Plan dashboard measure reports)

Priority: Respond to the Nature Emergency

Our NRW Business Plan sets out the following topics in relation to this priority:

- [Putting Nature at the Centre](#)
- [Protecting Habitats and Species including Terrestrial Freshwater and Marine](#)
- [Managing Land Sustainably](#)
- [Managing the Sea Sustainably](#)
- [Improving Water Quality](#)
- [Controlling Pollution](#)

The following pages reflect recent progress for each of those topics, along with the latest performance position in relation to the Business Plan dashboard measure/s for each topic.

Topic: Putting Nature at the Centre

Topic summary progress (i.e. overview of work undertaken against this topic):

- We have compiled a prioritised biodiversity work programme in line with our Vital Nature Strategy drawing out the actions and priorities for teams across each Place and for our Regulation & Permitting; Flood Risk & Incident Management; and Land Stewardship teams.
- We have published our ecosystem resilience atlas (CuRVe).
- We have begun drafting a Nature Network Practitioner' Guide (for external use).
- We have allocated approximately £600k of funding from our Vital Nature Fund enabling 25 projects to deliver work in line with the goals of Vital Nature.
- Work is also underway to develop the Resilient Ecological Network practitioner's guidance.
- Work is also progressing on developing on-line biodiversity (Environment Act (Wales) 2016 Section 6 duty) e-learning module for NRW staff.

Topic owner/s: Ruth Jenkins / Martyn Evans

Business Plan dashboard measure/s for this topic:

- **Biodiversity action across NRW:** This measure demonstrates how we in NRW are responding to the nature emergency and putting biodiversity at the core of our work. We are doing this by identifying the key priorities that NRW needs to focus on and establishing a programme to help manage and track Vital Nature delivery through our wide range of roles across NRW for the duration of the current Corporate Plan and beyond.

Measure: Biodiversity action across NRW

Latest position: (to end of March 2021):

- Our year end activity for this measure was to **report our progress, identifying any gaps or barriers**
- We have completed this activity and we are green at year end. Over the past year we have agreed priority actions in responding to the nature emergency.
- We have also developed a prioritised Biodiversity Work Programme aligning it to the Vital Nature Strategy (NRW's strategic steer for biodiversity) and the priority actions identified in response to the Nature Emergency.

What we are doing next:

- We will continue to develop and embed our biodiversity work programme through review, revision and refinement and will be working with WG on future funding and support for the Sustainable Land Management Scheme development for biodiversity outcomes.

Measure owner/s: Ruth Jenkins / Martyn Evans

Q1	to Q2	to Q3	Year end
Green	Green	Green	Green

See [here](#) for key used for Red / Amber / Green status
(for all Business Plan dashboard measure reports)

Topic: Protecting Habitats and Species including Terrestrial Freshwater and Marine

Topic summary progress (i.e. overview of work undertaken against this topic):

- Natur am Byth – the application to NLHF (National Lottery Heritage Fund) was submitted in February. The grant request was for £5M with total project costs of £8M. The decision on whether the project can proceed to the development phase is expected in June this year. If successful, the full application will be submitted in March 2023, with delivery from Sept 2023 to Sept 2027.
- We continue to manage three EU LIFE programmes that support our Vital Nature commitments.
- We have also submitted two further LIFE applications; ‘4 Rivers for LIFE’ which is a river restoration project across four SAC rivers - the Teifi, Tywi, Cleddau and Wysg –and ‘LIFEquake’, a bid for management of quaking bogs in Wales.
- We have prepared an NRW biosecurity embedding plan and we continue to work on the Invasive Alien Species Order..
- We have a programme of work for 21/22 with associated funding, also working with Welsh Government to develop a multi-year plan to prioritise action for protected sites /resilient ecological networks over 3 years from 22/25.
- Through our Marine Programme we are delivering projects including the Pen Llyn a'r Sarnau Biosecurity Planning project; trialling native oyster restoration, and enhancing biodiversity of artificial structures in the Port of Milford Haven.

Topic owner/s: Ruth Jenkins / Martyn Evans

Business Plan dashboard measure/s for this topic:

- **Priority actions undertaken on protected sites to improve condition of features:** Improving protected site condition is essential for maintaining biodiversity and building ecosystem resilience. This measure shows how we are progressing with actions to improve these sites and enable them to fully provide their associated ecosystem service benefits. We want these sites to function as a core component of a resilient ecological network enabling habitats and wildlife to thrive, to expand to recolonise areas from which they have been lost, and so to contribute to ecosystem services well beyond site boundaries.
- **Actions undertaken on National Nature Reserves (NNRs) on NRW managed land to improve condition and features:** This measure shows how well we are doing in maintaining or enhancing the condition of “our” NNRs. Of the 76 NNRs in Wales, we manage 58, 41 entirely and 17 through partnerships.
- **Delivering targeted action for declining species or those on the edge of extinction:** This reflects actions to address biodiversity loss and build ecosystems resilience. Unless we reverse biodiversity decline and build resilient ecosystems, our well-being and that of future generations will suffer. The measure demonstrates what we are doing as targeted actions for declining species or those on the edge of extinction in Wales.

Measure: Priority actions undertaken on protected sites to improve condition of features

Latest position (to end of March 2021):

What is the latest position? (to end of March 2021):

- Our target for year end was to have **80% of actions completed or underway**: however, 50% were underway or complete by the end of Q4. Disappointingly, we are **Red** at year end.
- During the autumn/winter, Covid-19 restrictions continued much longer than originally anticipated, affecting the necessary face to face negotiations and site visits needed to secure Land Management Agreements (LMA's) key to this area of work. Initially optimistic, in hindsight this re-tightening of the restrictions should have led to us alerting the issue earlier. As restrictions continued, the target could not be recovered. We have learned lessons for 2021/22.
- Contributing to this has been a necessary focus on making improvements to the LMA process to ensure an appropriate balance between technical conservation input and Land Agent support, allowing limited land agent resource to focus appropriately on their competing priorities. This and other technical staff capacity issues have partly been addressed with the appointment of Fixed Term staff funded by Welsh Government (WG) in 2020/21 who have been largely retained in 2021/22. We also have some additional Land Agent capacity through a framework contract.

What we are doing next:

- We are keen to improve our performance. Having retained the WG funded Fixed Term staff and developed better integrated work programmes we are in a better position to deliver the WG funded programme for protected sites in 2021/22. We will work with our LMA customers to deliver further improvements; balancing customers' needs with a compliant process. To secure adequate core resources to deliver our statutory functions for protected sites we are working with WG to secure a multi-year (3yr) programme to support the continued delivery of this work in Wales.

Measure owner/s: Ruth Jenkins / Martyn Evans

Q1	to Q2	to Q3	Year end
Green	Green	Green	Red

See [here](#) for key used for Red / Amber / Green status (for all Business Plan dashboard measure reports)

Measure: Actions undertaken on National Nature Reserves on NRW managed land to improve condition and features

Latest position (to end of March 2021):

- Our year end milestone activity was to have **85% of planned actions complete or in-hand**.
- We delivered 79% of planned actions by year end, within 7% of target. Unfortunately, this is not the targeted 85% we were on track to deliver at Quarter 3 and we therefore rate this Amber, defined as within 30% of target.
- In practice this means we have delivered 264 actions across 55 NNRs and spent £850K on key conservation management and infrastructure works. 50 or 90% of the 55 NNRs that we planned to deliver work on have received significant beneficial activity.
- Where actions were not delivered the primary reasons are Covid-19, with restrictions at the start of the year resulting in several survey and monitoring projects being deferred, and staff time, the latter is a particular issue in one area as a consequence of staff losses which affected the final quarter.

What we are doing next:

- Projects deferred due to Covid-19 have been rolled forward to 2021-22.
- Delivery of the 2021-22 work programme will be re-focussed on priority actions with maximum impact on site and feature condition.

Measure owner/s: Dominic Driver

Q1	to Q2	to Q3	Year end
Green	Green	Green	Amber

See [here](#) for key used for Red / Amber / Green status
(for all Business Plan dashboard measure reports)

Measure: Delivering targeted action for declining species or those on the edge of extinction

Latest position (to end of March 2021):

- Our year end milestone for this measure was **to report on progress of delivery of priorities in Plan of Action for salmon and sea trout.**
- We have-completed this activity. Of a total of 75 actions, 63 are completed for the year (many are ongoing annual actions, some of which will roll forward). 14 actions are scheduled for future delivery during the lifetime of the Plan of Action.
- We are Green at year end.

What we are doing next:

- We will now implement the annual programme of rolling actions. We will continue to deliver a capital fund in 21/22 for priority river restoration work for fisheries through a range of mechanisms including grants.

Measure owner/s: Ruth Jenkins / Martyn Evans

Q1	to Q2	to Q3	Year end
Amber	Green	Green	Green

See [here](#) for key used for Red / Amber / Green status
(for all Business Plan dashboard measure reports)

Topic: Managing Land Sustainably

Topic summary progress (i.e. overview of work undertaken against this topic):

- We hosted a successful audit against UKWAS in October 2020, we are closing the corrective actions, starting with the highest risk.
- We have developed a new Green Infrastructure Assessment Guide, completed the urban chapter in SoNaRR (State of Natural Resources Report) , and developed an all-Wales green space data set that is available to all Public Sector Geospatial Agreement members.

Topic owner/s: Ruth Jenkins / Rhian Jardine

Business Plan dashboard measure/s for this topic:

- **Number of UK Woodland Assurance Standard (UKWAS) Major Corrective Action Requests (CARs), Minor CARs and Observations (Obs.) open on NRW managed land from most recent annual audit and progress in closing them:** Being certified to UKWAS shows we sustainably manage the WGWE reaching Forest Stewardship Council® (FSC®) and Programme for the Endorsement of Forest Certification (PEFC) international standards. It means we can certify our forest products; we produce 60% of Wales' timber. Wales' state forests have been certified to UKWAS since 2001 and we aim to keep it that way. The World Wide Fund for Nature (WWF) awarded the UK a "Gift to the Earth" for being the first country in the world to achieve certification of all its state forests.
- **Progress on our support for Welsh Government on Green Infrastructure in urban areas, developing guidance to help the production of Green Infrastructure Assessments (GIA) and advice on using Area Statements during the Local Development Plan making process:** Welsh Government's (WG) Natural Resources Policy, PPW (Planning Policy Wales) 10 and the draft National Development Framework identify Green Infrastructure as a key mechanism to deliver nature based solutions and multiple benefits. We are working with WG to develop guidance and best practice in relation to Green infrastructure, informed by our area statement evidence and key themes, to inform local green infrastructure assessments and their integration with the National Development Framework and Local Development Plans.

Measure: Number of UKWAS Major Corrective Action Requests (CARs), Minor CARs and Observations open on NRW managed land from most recent audit against UKWAS (UK Woodland Assurance Standard) and progress in closing them

Latest position (to end of March 2021):

- Our key activity for this period was to progress the closure of Corrective Action Requests (CARs) and Observations arising from 2020 UK Woodland Assurance Standard audit, and for fewer of these to be opened at the next audit.
- We have closed the 1 major CAR. There are 4 minor CARs and 6 Observations open at the end of this reporting period, and we closed out 1 Observation during this reporting period.
- We are Green at year end.

What we are doing next:

- We will now continue to progress closure of the remaining open CARs and Observations and prepare for the 2021 audit. We will continue to embed the lessons learned from the 2020 audit in our management of the NRW estate.

Measure owner/s: Dominic Driver

Q1	to Q2	to Q3	Year end
Amber	Amber	Green	Green

See [here](#) for key used for Red / Amber / Green status (for all Business Plan dashboard measure reports)

Measure: Progress on our support for Welsh Government on Green Infrastructure in urban areas, developing guidance to help the production of Green Infrastructure Assessments (GIA) and advice on using Area Statements during the Local Development Plan making process

Latest position (to end of March 2021):

- Our year end milestone activity was to **sign off and disseminate new guidance and advice**.
- We have completed this activity. The guidance was signed off by our Development Planning and Advice Service (DPAS) Board on 9 March and the guidance is now ready for publication. Consistent with pre-election guidance, we will publish the guidance after the Senedd Elections.
- We are Green at year end.

What we are doing next:

- We will publish the guidance after the Senedd elections.

Measure owner/s: Ruth Jenkins / Rhian Jardine

Q1	to Q2	to Q3	Year end
Green	Amber	Amber	Green

See [here](#) for key used for Red / Amber / Green status
(for all Business Plan dashboard measure reports)

Topic: Managing the Sea Sustainably

Topic summary progress (i.e. overview of work undertaken against this topic):

- This topic covers a wide range of delivery across NRW's marine programme, including:
- Timely statutory advice, and development of key positions and guidance, in support of sustainable development at sea, with a focus on offshore renewable energy, including, for example, on Morlais tidal energy demonstration zone, and positions in relation to marine mammals and potential renewable energy impacts
- Dissemination of key NRW led research into the blue carbon storage potential of the Welsh Coastal and Marine environment and a forward work programme to embed blue carbon opportunities in our work and advice
- Development of evidence base to support our programmes, for example: updating NRW's marine mammal and seabird atlas; spatial opportunities for habitat restoration; and distribution of invasive non-native species in Welsh waters
- Delivery of multiple capital projects clustered under 8 key projects totally £600k of investment, including monitoring equipment capabilities, management of invasive non-native species, and restoration of saltmarsh and native oysters
- Reviewed the Dee and the Bury Inlet cockle fishery management plans
- Run a successful online collaborative event to engage our partners in delivery of our Marine Area Statement

Topic owner/s: Ruth Jenkins / Rhian Jardine

Business Plan dashboard measure/s for this topic:

- **Implement the Welsh National Marine Plan:** This measure reflects progress in relation to Wales National Marine Plan implementation milestones. This reflects the need to take integrated action to improve the condition and resilience of the marine environment, and to support proportionate decisions that take full account of environmental, social and economic considerations under the new planning framework of Wales National Marine Plan (WNMP). Key drivers for this area are: WNMP, Environment (Wales) Act 2016, Well-being of Future Generations (Wales) Act 2015, Marine and Coastal Access Act, and the requirement in the remit letter to apply a proportionate approach to consenting and advice.
- **Progress of Marine Protected Area network management actions:** This measure reflects progress with Marine Protected Areas network management actions. The marine protected area network is a key tool in developing greater resilience in the marine environment and is an integral consideration for all developments in the marine area, through Wales National Marine Plan policy. Key drivers for this area are: the Environment (Wales) Act 2015, the Marine and Coastal Access Act, the Marine Strategy Framework Directive, OSPAR (the Convention for the Protection of the Marine Environment of the North-East Atlantic) Marine Protected Area network requirements, and the climate and nature emergencies.

Measure: Implement the Welsh National Marine Plan

Latest position (to end of March 2021):

- Our year end milestone for this measure on implementing the Welsh National Marine Plan was to **sign-off and commence active use**
- We have completed this activity on target for this year. A wide variety of tools have been developed across the year to support implementation of the Welsh National Marine Plan (WNMP). For example, we have:
 - designed, signed off and begun use of a marine staff Technical Competency Framework that supports marine staff in developing their advisory competencies in line with the WNMP
 - approved and put into practice a new ‘ways of working’ agreement between NRW’s marine licensing team and marine advice working between MLT
 - drafted a marine advice service statement
 - developed and signed off new decisions documents for marine licensing decisions that includes documenting application of WNMP policy
 - Worked with WG and stakeholders on the application of core principles on restoration and enhancement to support implementation of the “encourage” element of the WNMP policy ENV_01: Resilient Marine Ecosystem.
- We currently at Green at year end

What we are doing next:

- Into 2021/22 we will continue with the programme of WNMP implementation, producing key guidance, tools, and staff support and training to ensure plan policy is reflected and embedded in all relevant work to support SMNR at sea.

Measure owner/s: Ruth Jenkins / Rhian Jardine

Q1	to Q2	to Q3	Year end
Green	Green	Green	Green

See [here](#) for key used for Red / Amber / Green status
(for all Business Plan dashboard measure reports)

Measure: Progress of Marine Protected Area network management actions

Latest position (to end of March 2021):

- Our year end milestone for this measure was to **sign off final delivery**
- We have completed this activity on target this year. All 12 actions for NRW to progress or complete in the action plan have been successfully progressed or completed. For example, we have:
 - Completed a project on assessing the vulnerability of Annex 1 marine habitat features to climate change.
 - Developed management options for the Gann baiting digging project.
 - Significantly progressed the three EMFF*-funded projects in the plan that NRW are leading on (biosecurity planning, site condition reporting and native oyster restoration), keeping them to budget and on schedule (these projects complete in 2022 or 2023). (* European Maritime and Fisheries Fund)
 - Successfully worked this year with stakeholders to develop actions under the Marine Protected Area (MPA) Network Condition Improvement Programme.
 - Continued to develop consistent and proportionate guidance to improve marine casework.
- We are currently at Green at year end

What we are doing next:

- We will continue to work with WG and key MPA management authorities to identify priority MPA network management action for the coming year. Within this, we will deliver a programme of further NRW-led MPA network management actions to work towards improving the condition of our network of sites enhancing the contribution the network makes to the health and resilience of Welsh seas and the benefits this provides to the people of Wales.

Measure owner/s: Ruth Jenkins / Rhian Jardine

Q1	to Q2	to Q3	Year end
Amber	Green	Green	Green

See [here](#) for key used for Red / Amber / Green status
(for all Business Plan dashboard measure reports)

Topic: Improving Water Quality

Topic summary progress (i.e. overview of work undertaken against this topic):

- We have exceeded the target of 505 investigations due by the end of 2020/21. For Quarter 4 170 investigations were delivered giving a cumulative total of 515.
- Completed investigations included a mixture of water quality, physical chemistry and biology, expert judgement assessments, mitigation measures, marine investigations for Dissolved Inorganic Nitrogen, and groundwater and saltmarsh investigations.
- Work during Covid-19 has been re-directed to investigations which has resulted in meeting the target this Quarter.

Topic owner/s: Ruth Jenkins / Sian Williams

Business Plan dashboard measure/s for this topic:

- **Number of Water Framework Directive (WFD) investigations completed based on number required at start of year; this is this year's contribution to a multi-year target:** The objective of the Water Framework Directive is to aim to achieve good status in water bodies over 3 six-year cycles. River Basin Management Plans, set out a programme of local and strategic measures and investigations, and an ambition of 5% improvement to good status by 2021.

Measure: Number of Water Framework Directive (WFD) investigations completed based on number required at start of year; this is this year's contribution to a multi-year target

Latest position (to end of March 2021):

- Our year-end target for was to deliver 505 completed Water Framework Directive (WFD) investigations.
- We have achieved this. We have completed 170 investigations this quarter and delivered 515 over 2020/21.
- We are Green at year end, work included a mixture of water quality physical chemistry and biology, expert judgement assessments, mitigation measures, marine investigations for Dissolved Inorganic Nitrogen, and groundwater and saltmarsh investigations.

What we are doing next:

- We will now continue to programme the investigations throughout the new financial year to meet future targets as they arise. Some investigations will require outputs from the 2021 classification when completed which has been delayed.

Measure owner/s: Ruth Jenkins / Sian Williams

Q1	to Q2	to Q3	Year end
Red	Green	Green	Green

See [here](#) for key used for Red / Amber / Green status (for all Business Plan dashboard measure reports)

Topic: Controlling Pollution

Topic summary progress (i.e. overview of work undertaken against this topic):

- Our metal mines strategy programme has progressed beyond initialising: we have reprofiled to address constraints around the pandemic and moved into a full delivery phase. Governance and project management has been built around the programme and the Coal Authority relationship has been progressed and is now well established, actively supporting delivery in 20/21. Although all available funding was not fully utilised during the year the outturn was within 8% of our revised profile. A detailed programme of work has been developed for 21/22 and financial support from Welsh Government established for 21/22. Additional staff are being recruited to support the programme going forward.

Topic owner/s: Nadia De Longhi / Martin Cox

Business Plan dashboard measure/s for this topic:

- **Progress of our work to reduce pollution from metal mines:** This measure reflects progress with the assessment and remediation of high risk sites, in line with our Metal Mine Strategy - Delivering a safe local environment and improvements to local air and water quality and ensuring the sites are safe.
- **Performance of regulated industrial, waste sites, and water quality discharges – number of category 1 and category 2 compliance breaches with appropriate regulatory response determined within 6 months:** Poor performance at permitted sites has the potential for impacts on the environment, communities and the reputation of a sector. They are also resource intensive in terms of our regulatory effort and are considered to pose a greater risk of incidents, which can also then consume a large amount of our resources and impact communities.

Measure: Progress of our work to reduce pollution from metal mines

Latest position (to end of March 2021):

- Our year end milestone is **assessing additional sites and catchments to provide a future programme.**
- We have a detailed programme of 17 projects with work progressing on all of them though delays obtaining planning support from Local Authorities has led to delays in some cases. As such our expenditure is lower than our initial plan. All pilot trials for those projects proceeding are delivered. Steps to continue work within the Government Covid-19 precautions and within Health and Safety aspects of the work have been implemented. Where funding was not required this financial year, excess monies have been handed back. We are successfully operating with project management assistance from Projects Delivery and the Coal Authority as planned, and have re-assessed the risks of each project given the effects of the pandemic (primarily slow planning decisions from Local Authorities) to re-profile our work. We have been successful in gaining Capex capital funding from WG for the continuation of the programme in 2021/22. We also recruited a Programme Technical lead.

What we are doing next:

- Programme management of the 2021/22 programme prepared and project management commenced to complete current projects and launch new projects for 2021/22
- We have the 2021/22 plan fully described and planned with over budgeting which can be constrained at year end. Through this approach we anticipate being able to spend our full allocation of Capex during the year. Recruitment and supporting funds have been put in place. Some projects are already underway and were carried over to 2021/22 due to last years constraints. Other projects are ready to commence and Project Delivery and the Coal Authority has worked effectively together with Geoscience to ensure a robust programme is ready to move forward.
- We are Amber at year end due to slow uptake of the project in its initial year and the impact of Covid. At the start of the second year our procedures and programme management are well established to fully deliver this years programme.

Measure owner/s: Ruth Jenkins / Sian Williams

Q1	to Q2	to Q3	Year end
Amber	Amber	Amber	Amber

See [here](#) for key used for Red / Amber / Green status
(for all Business Plan dashboard measure reports)

Measure: Performance of regulated industrial, waste sites, and water quality discharges – number of category 1 and category 2 compliance breaches with appropriate regulatory response determined within 6 months

Latest position (to end of March 2021):

- Our year-end target for this measure was for **75% of category 1 and category 2 compliance breaches to have an appropriate regulatory response determined within 6 months**. There have been **12** category 1 and category 2 compliance breaches over the period (July – September 2020) and **100%** have had an appropriate regulatory response.
- NB – The 12 compliance breaches is a reduction from the 23 compliance breaches recorded in Quarter 2 (January 2020 – March 2020) and a significant reduction from the 43 compliance breaches recorded in Quarter 1 (October – December 2019).

What we are doing next:

- Our target is that **75% of category 1 and category 2 compliance breaches to have an appropriate regulatory response determined within 6 months**. We have successfully managed to meet this target over the 2020/21 Financial Year.

Measure owner/s: Nadia De Longhi / Martin Cox

Q1	to Q2	to Q3	Year end
Green	Green	Green	Green

See [here](#) for key used for Red / Amber / Green status (for all Business Plan dashboard measure reports)

Priority: Developing and using our evidence with partners to advocate for and deliver SMNR

Our NRW Business Plan sets out the following topics in relation to this priority:

- [Creating a Shared Vision for Natural Environment for 2050](#)
- [Improving and presenting evidence about the natural environment](#)
- [Work with Partners and communities using Area Statements](#)

The following pages reflect recent progress for each of those topics, along with the latest performance position in relation to the Business Plan dashboard measure/s for each topic.

Topic: Creating a Shared Vision for Natural Environment for 2050

Topic summary progress (i.e. overview of work undertaken against this topic):

- In April we will be meeting with the 2050 Advisory Group for advice on products we have developed to support the national conversations. We will be finalising the scenarios / questions for the sessions.

Topic owner/s: Sarah Williams

Business Plan dashboard measure/s for this topic:

- **Delivery of the programme to create a shared vision for the natural environment for 2050, building on our work for Green Recovery:** This measure reflects progress in relation to the milestones achieved in developing a shared vision for the natural environment for 2050. The vision will play an important role in developing a shared understanding across Wales of the value and importance of our natural resources and drive action by everyone. The Climate and Nature emergencies underline the importance of this work. The vision will draw on socio-economic scenarios to illustrate how the use and management of natural resources in Wales in 2050 may change, and on the range of opportunities for action to drive multiple benefits.

Measure: Delivery of the programme to create a shared vision for the natural environment for 2050, building on our work for Green Recovery

Latest position (to end of March 2021):

- Our year end milestone activity for this measure was to **begin initial 2050 Vision engagement sessions**
- We have not completed this activity as we were advised by the Vision 2050 Programme Board to review the feasibility of starting the national conversation events due to the introduction of Covid-19 lock down restrictions in December 2020.
- We currently expect we will be Red at year end

What we are doing next:

- We will now begin the initial 2050 Vision engagement sessions in October 2021.
- In line with the updated timeline we will populate the stakeholder database, finalise engagement materials and test the online engagement hub, subject to securing additional resource for 2021 / 22 to support the project.

Measure owner/s: Sarah Williams

Q1	to Q2	to Q3	Year end
Amber	Amber	Green	Red

See [here](#) for key used for Red / Amber / Green status
(for all Business Plan dashboard measure reports)

Topic: Improving and presenting evidence about the natural environment

Topic summary progress (i.e. overview of work undertaken against this topic):

- NRW's second State of Natural Resources Report (SoNaRR2020) was officially launched in January following the publication of the summary report and key findings.
- The full report that includes supporting evidence and a summary of the evidence gaps was published in March. This completes the 'formal' publication of SoNaRR and enable users to drill down from the summary report to the supporting technical chapters.
- SoNaRR 2020 is now available, and will be promoted to, Welsh Government and other stakeholders to help ensure that the sustainable management of natural resources is considered in developing policies, plans and decisions.

Topic owner/s: Helen Wilkinson / Steve Morgan

Business Plan dashboard measure/s for this topic:

- **Publish State of Natural Resources Report 2:** This measure reflects progress in relation to our statutory duty to publish the report by December 2020, its purpose and the way we are planning to improve and present evidence during this year. This is important to maintain our reputation, to ensure the Welsh Government take sound evidence into account in the development of the next Natural Resources Policy and to ensure our staff and stakeholders can access the most appropriate evidence when working to deliver the Sustainable Management of Natural Resources.

Measure: Publish State of Natural Resources Report 2

Latest position (to end of March 2021):

- Our year end milestone for this measure was **publication of supporting evidence and full report (as agreed with WG)**
- The SoNaRR2020 summary report and key messages was published in December and officially launched in January as an online event. The event was well received, with 144 key stakeholders attending the live event and 98 watching the YouTube channel.
- The full report that includes supporting evidence and a summary of evidence needs was published on the NRW web site in March; along with the first phase of a new Wales environmental information portal.
- We are Green at year end.

What we are doing next:

- The next phase will involve promotion of SoNaRR2020 to a wide range of stakeholders, seeking feedback and encouraging its application as an evidence base to inform national and local policies, plans and decisions.
- We will also promote the evidence needs and seek feedback in the information portal to help improve reporting in 2025

Measure owner/s: Helen Wilkinson

Q1	to Q2	to Q3	Year end
Amber	Green	Green	Green

See [here](#) for key used for Red / Amber / Green status
(for all Business Plan dashboard measure reports)

Topic: Work with partners and communities using Area Statements

Topic summary progress (i.e. overview of work undertaken against this topic):

- We have adapted our engagement approach during Covid-19 to enable us to continue to build relationships, tools and stakeholder networks to strengthen the foundations for Area Statements. Examples include: a 2-day Marine Stakeholder Workshop; development of use of GIS StoryMaps in our data portal, such as developing South Central woodland creation opportunities; and supporting the development of a resilient ecological network practitioner guide to assist practical delivery.
- Building our knowledge of the use of Area Statements as an evidence base with local nature partnerships and networks to inform other organisations plans programmes and decisions.
- Developing collaborative work programmes with our partners under each theme in the Area Statements in each place.
- All places (Area Statements) are informing the green infrastructure assessment guidance being developed by NRW for Local Authorities, and our Place have worked to support development of Green Infrastructure Strategies e.g. Swansea's is co-authored with NRW.
- The use of Area Statements as a vehicle for delivering the sustainable management of natural resources is still very much in its infancy and we are continuing to mature their use within NRW and beyond.

Topic owner/s: Ruth Jenkins / Martyn Evans

Business Plan dashboard measure/s for this topic:

- **Use of Area Statements within NRW, informing priorities through joint working:** This measure is to ensure that Area Statements drive the work of NRW and that our place plans and service plans align to support Area Statements delivery.

Measure: Use of Area Statements within NRW, informing priorities through joint working

Latest position (to end of March 2021):

- Our year end milestone activity was to **report on progress internally, identifying lessons learnt and areas for change across the organisation**. This is a multi-year activity, and we have completed this year's planned activity to gather the learning in relation to this milestone, we are therefore Green at year end.
- A detailed report highlighting progress made to date and identifying key areas for potential improvements or further investigation will be available in June 2021. This will be informed by the work on understanding use of Area Statements internally ('User stories' project - capturing the voices of 5 individuals who've used Area Statements in their work) and looking at internal processes and 'ways of working', to improve internal channels of communication and Area Statement embedding.
- We continue to support the use of Area Statements in both a planned and responsive way to influence the plans of others. We have supported WG in developing revised local well-being assessment guidance to PSBs (Public Services Boards) to include the use of SoNaRR and Area Statements. This work to support PSBs is ongoing.

What we are doing next:

- Produce the learnings report to inform our programme of activity in 2021-22 and the next Corporate Plan. Consider our 'Ways of working' to link policy and operations activity around Area Statements. In this way continue to ensure Area Statements play their part to influence key stakeholders at various scales to include taking opportunities arising from drivers like Future Wales, the soon to be formed Corporate Joint Committees and Regional strategies.

Measure owner/s: Ruth Jenkins / Martyn Evans

Q1	to Q2	to Q3	Year end
Green	Green	Green	Green

See [here](#) for key used for Red / Amber / Green status
(for all Business Plan dashboard measure reports)

Priority: Developing NRW into an excellent organisation that serves the communities of Wales

Our NRW Business Plan sets out the following topics in relation to this priority:

- [Responding to and Managing Incidents](#)
- [Benefiting Communities](#)
- [Developing Our Organisation](#)
- [Ensuring Everyone's Well-being, Health and Safety](#)
- [Focussing on Customers](#)
- [Making the Most of Commercial Opportunities](#)

The following pages reflect recent progress for each of those topics, along with the latest performance position in relation to the Business Plan dashboard measure/s for each topic.

Topic: Responding to and Managing Incidents

Topic summary progress (i.e. overview of work undertaken against this topic):

- Through the work of the Incident Management Business Board and the Operational Incident Management Groups we continue to ensure NRW's approach to managing incidents is driven by a clear steer and in consideration of risks identified on our Risk Register, that is informed by the potential impacts of incidents on the environment and people of Wales.
- We are working to ensure we have the right people, in the right place at the right time, with the relevant training and tools they need to respond to incidents as effectively and efficiently as possible. Underpinned by clear guidance and procedures that align with best practice and the Joint Emergency Services Interoperability Principles (JESIP).
- We have continued to respond to a wide range of incidents, working with our multi-agency and professional partners, including working with partners to respond to flooding, pollution incidents, potential impacts following EU Exit and the Coronavirus pandemic, whilst maintaining our business continuity and providing support and resources (by way of mutual aid assistance) to those that needed them.

Topic owner/s: Jeremy Parr / Lyndsey Rawlinson

Business Plan dashboard measure/s for this topic:

- **Incident Assessment (within 1 hour):** We have introduced a centralised triage approach to ensure that all reports of incidents are assessed according to our Incident Categorisation Guidance within an hour. This allows us to prioritise our resources and provide an immediate and effective response to incidents we categorise as High and helps us to mitigate and reduce the impact to communities and the environment.
- **Response to 'High category' incidents (within 4 hours):** For incidents we class as High Level (using our Incident Categorisation Guidance criteria), we aim to respond within four hours of being notified. This is to ensure we prioritise our efforts on the high impact incidents, and we act within a suitable timeframe to minimise harm and impact. Response may include physical attendance at the site, but also includes other activities, such as contacting professional partners.

Measure: Incident Assessment (within 1 hour)

Latest position (to end of March 2021):

- Our target for this measure is **assessment within one hour for 95% of incidents**.
- We have achieved this every month over the last year.
- For this period (Quarter 4) incident assessment has taken place within one hour for 97% of incidents.
- We are Green at year end.

What we are doing next:

- We will continue with the triaging of all incident reports to maintain this performance.

Measure owner/s: Jeremy Parr / Lyndsey Rawlinson

Q1	to Q2	to Q3	Year end
Green	Green	Green	Green

See [here](#) for key used for Red / Amber / Green status
(for all Business Plan dashboard measure reports)

Measure: Response to 'High category' incidents (within 4 hours)

Latest position (to end of March 2021):

- Our year-end target for this measure is **response to 95% of initial 'High category' incidents within four hours**.
- We have not achieved this. For this period (Quarter 4) a response to high category incidents has taken place within four hours for 87% of incidents. We have seen performance over the last 12 months range from 79% to 95%, having set ourselves the ambitious target of 95% for each quarter. The cumulative total for the year is 89%.
- We are Amber at year end.

What we are doing next:

- We will now use the recently formed Operational Incident Management Groups (OIMGs) to focus on performance in each Place, and on this measure specifically, to improve consistency and performance.
- We have also initiated a Continuous Improvement (CI) project to identify the further reasons behind performance issues and determine what steps can be taken to improve and sustain performance in the longer term.
- We introduced a change in August 2020 to allow direct recording of the response time. Previously, this information had to be extracted from the system and was not always available as it was not always entered by users. We will continue to promote this improvement to users, and this should see improvements in the recorded performance information. We will continue to work with Duty Officers and WIRS (Wales Incident Reporting System) superusers, building on efforts from the past year, to target issues.
- We intend to review the target for this measure in 6 months-time, once the CI project and work of the OIMGs has had time to embed. We will look at the evidence around what performance percentage is achievable for this measure and how it can be benchmarked. Currently the 95% target is ambition based.

Measure owner/s: Jeremy Parr / Lyndsey Rawlinson

Q1	to Q2	to Q3	Year end
Amber	Amber	Amber	Amber

See [here](#) for key used for Red / Amber / Green status (for all Business Plan dashboard measure reports)

Topic: Benefitting Communities

Topic summary progress (i.e. overview of work undertaken against this topic):

- The Board's approval of the customer experience and engagement is a big step forward. We have also seen significant improvements in media coverage and have rescheduled the perception survey for after the Senedd Election.
- NRW has successfully completed the delivery of the Wales Coast Path and National Trail Programmes (trail maintenance, improvements and marketing) supporting the health and well-being of local communities and visitors and providing Wales tourism walking products which benefit hospitality/tourism businesses along the trails.

Topic owner/s: Catrin Hornung / Ruth Jenkins

Business Plan dashboard measure/s for this topic:

- **Develop our approach to engaging and working with stakeholders – both new stakeholders and those we know well:** Our relationships with stakeholders and partners are increasingly important as we aim to deliver better environmental outcomes through increased collaboration and closer working with communities of all kinds.
- **Support Welsh Government's Tourism Action Plan by promoting the Wales Coast Path and National Trails:** We will invest at least 95% of the allocated budget in the Wales Coast Path to fund infrastructure maintenance and development, marketing, monitoring and running costs. This will benefit local communities and visitors by facilitating coastal access, with resulting economic and health benefits. This measure concerns promoting the Wales Coast Path and National Trails with our partners.

Measure: Develop our approach to engaging and working with stakeholders – both new stakeholders and those we know well

Latest position (to end of March 2021):

- Our year end milestone activity was to **undertake review of stakeholder perception via survey; appraisal of media coverage and advocacy; and evaluation of consultation feedback.**
- We have not completed all of this activity because we have decided it is more worthwhile to survey after the Senedd Elections. Media analysis for Quarter 4 shows 1,448 items of coverage, with a reach of 46,028,788,046. Tone was 73.4% positive and 4.3% negative. This compares to reach of 13,678,462,220 and positive coverage accounting for 49.6% in the same quarter last year. Citizen Space is allowing us to better evaluate our consultation feedback and we are routinely publishing consultation response summaries, with plans to improve this further in 2021.
- We are Amber at year end.

What we are doing next:

- We will now begin implementation of our customer experience and engagement strategy.

Measure owner/s: Catrin Hornung

Q1	to Q2	to Q3	Year end
Amber	Amber	Amber	Amber

See [here](#) for key used for Red / Amber / Green status
(for all Business Plan dashboard measure reports)

Measure: Support Welsh Government's Tourism Action Plan by promoting the Wales Coast Path and National Trails

Latest position (to end of March 2021):

- Our year end milestone activity was to **promote the Wales Coast Path and National Trails in line with the annual marketing plan.**
- We have completed this activity
- We are Green at year end.

What we are doing next:

- We will now refresh Wales Coast Path and National Trail marketing strategy 2021/22 and consult stakeholders.
- Deliver Our Living Trails project, £100k WG funding, to explore and pilot approaches that deliver multiple benefits along access corridors, including ecosystem resilience, focussing on WCP in 2021/22.

Measure owner/s: Ruth Jenkins / Martyn Evans

Q1	to Q2	to Q3	Year end
Green	Green	Green	Green

See [here](#) for key used for Red / Amber / Green status
(for all Business Plan dashboard measure reports)

Topic: Developing Our Organisation

Topic summary progress (i.e. overview of work undertaken against this topic):

- We now have a new recruitment process in place to streamline for both applicants and recruiting managers
- Our Leadership Development programme launched to equip people managers with necessary skills
- Our Staff engagement group are involved in development of the Customer Experience strategy and Renewal programmes
- The new EQIA (Equality Impact Assessment) has been implemented and we are now supporting teams with the completion. We are using a tracker to determine what other changes may need to be made to guidance

Topic owner/s: Su Turney / Steve Burton

Business Plan dashboard measure/s for this topic:

- **Develop our NRW workforce plan, progressing priority actions:** This measure reflects how we are progressing priority actions related to our workforce plan. Our workforce plan sets out a clear workforce vision for the future, identifies current risks and opportunities and defines our strategic approach to the development of our current and future workforce. Priority actions that we will be working on this year related to the workforce plan will begin the important work to ensure we have the right skills, environment and culture to enable us to deliver our Corporate Plan and to serve the communities of Wales.
- **Review our Equality Impact Assessment process so that we engage with communities in a more equitable way:** The Equality Impact Assessment (EqIA) is required to assess the potential impact on any proposed organisational plans. A more robust EqIA will help challenge our thinking and provide assurance that we are engaging with a variety of communities and not disadvantaging any specific groups. The measures will be outlined within the Equality Action Plan and will include: that our services are accessible to all and encouraging a diverse customer base.

Measure: Develop our NRW workforce plan, progressing priority actions

Latest position (to end of March 2021):

- We are developing the second iteration of the Workforce Plan, having delivered the priority actions identified for 2020/21.
- Our year end milestone activity was to begin to develop Apprenticeship and Graduate recruitment framework.
- We have not completed this activity due to funding issues. However, we have just received approval to proceed with the creation of a Placements Team, so work will commence on this activity once the new Team is in place.
- We are Amber at year end.

What we are doing next:

- We will commence the recruitment for the Placements Team, commencing beginning of June 21.

Measure owner/s: Su Turney

Q1	to Q2	to Q3	Year end
Red	Green	Green	Amber

See [here](#) for key used for Red / Amber / Green status
(for all Business Plan dashboard measure reports)

Measure: Review our Equality Impact Assessment process so that we engage with communities in a more equitable way

Latest position (to end of March 2021):

- Our year end milestone activity was to **begin implementation**.
- We have completed this activity and have implemented the new EqIA Assessment with supported training and video materials to help staff.
- We are Green at year end.

What we are doing next:

- We will now monitor its use through a tracker to identify any areas that need further improvement and this will also form part of the EDI Project

Measure owner/s: Steve Burton

Q1	to Q2	to Q3	Year end
Amber	Green	Green	Green

See [here](#) for key used for Red / Amber / Green status (for all Business Plan dashboard measure reports)

Topic: Ensuring Everyone's Well-being, Health and Safety

Topic summary progress (i.e. overview of work undertaken against this topic):

- We have submitted our evidence to Public Health Wales and we are awaiting assessment. This has been deferred by PHW (Public Health Wales) due to them diverting resources to support Covid-19
- We have continued to monitor near miss and lost time incidents which have remained static due to Covid-19 restrictions. However as restrictions are lifted we are proactively engaging with managers to ensure near misses are reported and looking to support refresher training where necessary.

Topic owner/s: Steve Burton

Business Plan dashboard measure/s for this topic:

- **Progress towards Corporate Health Gold Standard:** This measure reflects how we are working to achieve an enhanced level of certification to the Corporate Health Standard, where we are looking to build on our current Silver rating (and are aiming to be in a position of having the evidence ready to attain Gold rating by the end of the year).
- **Number of near misses and lost time incidents:** This measure reflects the culture of the organisation - the principle being the more staff feel confident and able to report near misses the more likely we are to avoid more serious incidents because we will apply lessons from those near misses and as a result LTIs decrease.

Measure: Progress towards Corporate Health Gold Standard

Latest position (to end of March 2021):

- Our year end milestone activity was for **all evidence gathered ahead of assessment** in relation towards the Corporate Health Gold Standard.
- We have this activity and are awaiting a date from Public Health Wales for an assessment date
- We are Green at year end.

What we are doing next:

- We will now be continuing to develop further our Well-being opportunities for staff

Measure owner/s: Steve Burton

Q1	to Q2	to Q3	Year end
Green	Green	Green	Green

See [here](#) for key used for Red / Amber / Green status
(for all Business Plan dashboard measure reports)

Measure: Number of employee near misses and lost time incidents

Latest position (to end of March 2021):

- Our year end milestone activity was to report on the **number of employee near misses and lost time incidents**. We have assessed this as amber because the number of near misses reported have decreased due to Covid-19, (with reduced field/site work being undertaken and with offices having reduced occupancy) as alerts levels were implemented by WG in December 2020. Staff are encouraged to work from home due to further lockdown alerts. There have been 48 employee near misses (compared with 65 in the same period 19/20) and 1 lost time incidents (compared with 4 in the same period 19/20).
- We are Amber at year end.

What we are doing next:

- We will now continue to report the number of employee near misses for 2020/2021. With further communication to staff and line managers with the emphasis on the importance of incident and near misses reporting. Wellbeing health & safety data will focus on the near miss reporting data and to reiterate the need to report any incidents and near misses, especially at home.

Measure owner/s: Steve Burton

Q1	to Q2	to Q3	Year end
Red	Amber	Amber	Amber

See [here](#) for key used for Red / Amber / Green status
(for all Business Plan dashboard measure reports)

Topic: Focussing on Customers

Topic summary progress (i.e. overview of work undertaken against this topic):

- The final Co-Production pilot report was delivered by WCVA in February 2021. This covered the work carried out in the Area Statements and Permitting teams. Work has now begun with those teams to decide how best to build upon this report and develop their new ways of working, whilst at the same time considering how we share the learnings, best practice and the benefits of working co-productively, for both the staff and our customers, wider across NRW.
- We have had the first year of a redeveloped grants programme having reviewed in line with the grants strategy. We have carried out business improvement work on Land Management Agreements and begun work to redefine other types of funding agreements to support partnership working. In this quarter we have supported the internal audit of grants in order to be well placed to learn the lessons and support the evaluation and further refinement of the grants service going forward.
- An emphasis on ensuring that we deliver on the grants we have in flight this year in advance of having a resourced grants assessment and monitoring team has meant that the planned work to review our full suite of funding mechanisms and transform to a revised, end to end grants service in line with our new grants strategy and process has not been possible. The completion of this work will be undertaken in the early part of 21/22.

Topic owner/s: Naomi Lawrence / Ruth Jenkins

Business Plan dashboard measure/s for this topic:

- **Progress customer programme – increasing customer involvement:** A key outcome for the programme is to increase and improve the ways that our customers can contact and interact with us through a range of accessible ways that suit them. Providing a service that is consistent in quality and easy to use will ensure we get more right first time for our customers, build longer term relationships and increase our customer satisfaction levels.
- **Review and define all funding mechanisms available to NRW, ensuring alignment with our Grants Policy and focussing on customer needs:** The funding mechanisms available to NRW must be clearly defined and understood to ensure effective project and programme management that meets the needs of internal and external customers

Measure: Progress customer programme – increasing customer involvement

Latest position (to end of March 2021):

- Our year end milestone activity was to **review programme findings using customer insights to begin embedding good practice across the organisation**
- We have completed this activity. The final report of the Co-Production pilots was received in February 2021 and the initial briefing was held with the Engagement Practitioner Group. We have begun planning how we will promote the findings of this report with the rest of NRW to share the best practice learning.
- We are Green at year end.

What we are doing next:

- We will now focus on raising awareness of the newly approved Customer Experience and Engagement strategy to begin the process of embedding Customer Experience as a new way of working across NRW.

Measure owner/s: Naomi Lawrence

Q1	to Q2	to Q3	Year end
Green	Green	Green	Green

See [here](#) for key used for Red / Amber / Green status
(for all Business Plan dashboard measure reports)

Measure: Review and define all funding mechanisms available to NRW, ensuring alignment with our Grants Policy and focussing on customer needs

Latest position (to end of March 2021):

- Our year end milestone activity was to **report on progress of funding mechanisms undergoing process improvement and provide further update on the Grants awarded**
- We have allocated grants totalling £5.4m, with c. £3.5M via the strategic allocated funding (SAF) mechanism this year and as we reach year end we expect all to meet claim deadlines. Projects include; supporting delivery by 19 PSBs, the peatland programme, five Environmental NGO projects and work with Afonydd Cymru. We have issued 38 Shared Outcome Requests (SOR) Grants delivering outcomes for local and regional priorities totalling over £1M. The land management improvement project has worked across ensured the Land Management Agreement process is as easy to use as possible, is accountable and offers Value for Money.
- We have concluded the formal Grants change programme element of our grants transformation
- We are supporting the internal audit of SAFs and SORs processes to help improve the grants process in the future.
- We are Amber at year end because of slippage in meeting the full grants transformation timetable.

What we are doing next:

- Monitoring all claims received from partners to ensure prompt payment of verified claims.
- Continuing to support the Internal audit to embed the learning in our review of grants process and transformation programme in 21/22. The Land Management Improvement project will be concluded in June. We will conclude the principle and terms of our Partnership Agreements and develop of suite of new agreements to meet business need.

Measure owner/s: Ruth Jenkins

Q1	to Q2	to Q3	Year end
Green	Amber	Amber	Amber

See [here](#) for key used for Red / Amber / Green status (for all Business Plan dashboard measure reports)

Topic: Making the Most of Commercial Opportunities

Topic summary progress (i.e. overview of work undertaken against this topic):

- Despite the economic restrictions and issues caused in part by the Pandemic and some uncertainty over the impact of Brexit, Commercial at NRW has had a very productive and successful year.
- For Timber, the new Timber Sales and Marketing Plan was agreed at our Board, there was record timber income of over £30million, and we successfully offered more than 95% of volume expected to the market.
- NRW's first Commercial Strategy was also agreed at our Board and has been well-received after extensive engagement during Quarter 3.
- Despite the Pandemic we have still successfully worked with developers to keep opportunities moving in the right direction such as the opening of the new Zipworld Adventure in Rhigos, South Wales, which has been able to open to the public as soon as Covid restrictions made that possible.
- Commercial has made significant strides in 2020 to make Governance processes more adaptable to commercial opportunities.
- Several Third Party Access Agreements have been agreed during the year enabling renewable energy schemes to go ahead and feed into the 70% target set by the Welsh Government for 2030. Commercial has embraced being more strategic and less reactive-only in its approach by engaging with the Welsh Government to review land availability for renewables, to explore limitations and how to overcome them on the grid connections in mid-Wales and to look at new funding/contractual models for energy development across the NRW estate (this latter work is ongoing).

Topic owner/s: Elsie Grace / Victoria Rose-Piper

Business Plan dashboard measure/s for this topic:

- **Publish NRW Commercial Strategy:** The Commercial Strategy will supersede the Current Enterprise plan and will for the first time unite under a common approach NRW's income generating portfolio areas. It sets out what we will focus on in the next five years and NRW's approach to commercial opportunities, including the development of the People, Planet, Prosperity measurement of commercial success and value.
- **Timber volume offered to market/sold/dispached:** NRW currently offers an available timber harvest of 850,000m³ per annum or around 2/3 of the total Welsh market, which generates a typical gross income of approximately £20 million and supports the timber economy in Wales. This is a commitment set out in the Timber Sales and Marketing Plan.

Measure: Publish NRW Commercial Strategy

Latest position (to end of March 2021):

- Our year end milestone activity was to **launch the NRW Commercial Strategy**
- The Commercial Strategy was signed off at Board on the 24th March 2021 and will now be published on our website by year end.
- We are Green at year end.

What we are doing next:

- We are now preparing the implementation and marketing strategy for 2021/22

Measure owner/s: Elsie Grace

Q1	to Q2	to Q3	Year end
Amber	Green	Green	Green

See [here](#) for key used for Red / Amber / Green status
(for all Business Plan dashboard measure reports)

Measure: Timber volume offered to market/sold/dispatched

Latest position (to end of March 2021):

- Our year end target was for **850,000m³ to market**.
- We have completed the target figure within 5% and offered some 846,000m³ to market, awarded 642,000m³ and enabled the production of 824,000m³ at the end of the year, which has provided an income of £31million.

What we are doing next:

- We will now commence the sales year 2021/22 with an initial sale in April 2021 of 183,000m³ and maintain continuity of supply and income.

Measure owner/s: Victoria Rose-Piper

Q1	to Q2	to Q3	Year end
Green	Green	Green	Green

See [here](#) for key used for Red / Amber / Green status
(for all Business Plan dashboard measure reports)

Priority: Responding to the Covid-19 pandemic and the UK Leaving the European Union, taking opportunities for a green recovery

Our NRW Business Plan sets out the following topics in relation to this priority:

- [Providing Advice and Guidance](#)
- [Being Ready for Change](#)

The following pages reflect recent progress for each of those topics, along with the latest performance position in relation to the Business Plan dashboard measure/s for each topic.

Topic: Providing Advice and Guidance

Topic summary progress (i.e. overview of work undertaken against this topic):

- This topic covers a wide range of delivery across NRW's operational, policy and regulatory work.
- Maintained and updated an organisation wide risk register and programme of work leading on opportunities, risks and impacts following EU Exit on behalf of NRW and coordinating our response to key issues.
- Liaised and worked closely with WG, other agencies, Defra, Environmental NGOs and other stakeholders on EU Exit related issues.
- Established a core and technical group led approach to responding to the Agriculture (Wales) Bill White Paper, developing 'one voice' and collaborating with WG and across NRW to develop a comprehensive response.
- Working closely with WG policy leads on key EU Exit issues including waste, industry, water, sustainable land management, marine, biodiversity and future regulations.
- Led NRW's approach to Environmental Principles and Governance and met with the Interim Assessor to develop links, liaised with WG on EU Exit issues including transfer of functions and developed a draft international engagement strategy through collaborative workshops with staff and equivalent agencies.

Topic owner/s: Ruth Jenkins / Nadia De Longhi

Business Plan dashboard measure/s for this topic:

- **NRW's contribution following EU Exit including milestones on: i. Transfer of functions; ii. Environmental Principles, governance and the new oversight body; iii. New legislation (development of Agriculture and Fisheries Bills):** NRW must respond effectively to developing issues and changes for advice and guidance to staff, customers and stakeholders. To support our operations, policy and regulatory work it is essential that NRW maintains and updates advice and guidance effectively in response to issues and changes following EU exit. This will support effective customer engagement and enforcement and regulation of permits, licences, certificates and exemptions and support our wider role and remit in the pursuit of SMNR and Well-being of Future Generations.

Measure: NRW's contribution following EU Exit including milestones on: Transfer of functions; Environmental Principles, governance and the new oversight body, and; New legislation (development of Agriculture and Fisheries Bills)

Latest position (to end of March 2021):

- Our year end milestone activity was to provide an **update**. We provide monthly updates to CEO, NRW Board and our Executive and Leadership Teams (ET/ LT) on Brexit issues and report to our ET and NRW Board as required.
- Work to date includes close liaison and advice to WG on key legislative developments including Agriculture (Wales) Bill and supporting and working with the new Interim Environmental Protection Assessor. We have worked closely with our Incident Management and Operations teams with response to Brexit risks and impacts, including developments at ports.
- We attend WG Brexit bird table and Minister's Roundtable meetings, supporting, advising and influencing WG Brexit policy work.
- This is a multi-year activity to monitor and respond to any opportunities, risks and impacts due to EU Exit.

What we are doing next:

- We will continue to manage this transitional programme of work, responding to key issues and work over the next year monitoring and responding to risks, impacts and opportunities as they arise and embedding this work into our Business as Usual work.
- There is a maximum of 18 months remaining in this programme of work, without additional funding or extensions to FTA (Fixed Term) posts this work will wind down over the next 12-18 months as posts become empty and Business as Usual teams are required to pick up any remaining long-term work. This risk is highlighted as part of the leadership Team's risk register Brexit risk.

Measure owner/s: Ruth Jenkins / Nadia De Longhi

Q1	to Q2	to Q3	Year end
Green	Green	Green	Green

See [here](#) for key used for Red / Amber / Green status (for all Business Plan dashboard measure reports)

Topic: Being Ready for Change

Topic summary progress (i.e. overview of work undertaken against this topic):

- We have continued to respond to the challenges of the both the Covid-19 pandemic and EU Exit (whilst maintaining our business continuity) by utilising our internal strategic and tactical response groups to support our standard incident response command and control structure. We have also offered, and in some cases provided, support to our multi-agency partners by way of mutual aid as part of our responsibilities as a Category 1 Responder.

Topic owner/s: Jeremy Parr / Lyndsey Rawlinson

Business Plan dashboard measure/s for this topic:

- ***Progress of NRW's preparedness for any potential incidents or issues following EU Exit;***

This measure specifically focusses on the incident response work we need to undertake as an organisation to plan and prepare NRW for what may happen as a result of the UK leaving the EU and the end of the transition period, which will occur on 31st December 2020. This work involves us ensuring our internal policies and procedures are in place to allow us to manage this as an incident, which includes focussing on our business continuity planning which is key to help us manage any significant business disruption. It involves ensuring we have a resilient incident management system in place, to manage this as an incident as required with key staff trained and prepared to deal with this. We will ensure we consider and provide mitigation for the key risks that may affect us through this, which may be external risks coming from the arrangements of how we leave; it may be multiple incidents to manage, including Covid-19 and environmental incidents or it may be internally focussed risks that may affect our ability to deliver our duties. Through this there will also be a focus on how we work with Welsh Government throughout, and also the relationship we have and the role we play with our multiagency partners through the 4 Local Resilience Forums.

- ***Implement Covid-19 Renewal programme:***

We have set up a Renewal Programme Board to identify the opportunities that have emerged from the Covid situation and which of these we want to pursue both in terms of how our organisation is managed and the wider green recovery work with partners.

Measure: Progress of NRW's preparedness for any potential incidents or issues following EU Exit

Latest position (to end of March 2021):

- We have continued to have Tactical and Strategic meetings each week to manage any impacts or issues that arise from the UK Leaving the European Union (EU Exit).
- The situation remains stable with no adverse impacts on NRW's business continuity being reported.
- Staff remain in discussions with our partners and Welsh Government to ensure we are sighted on any potential issues and can input and advise, where our advice is required.
- We currently consider we are Green in relation to this measure.

What we are doing next:

- We will continue D20 reporting (EU Exit & Covid-19 related issues) to WG weekly (likely to continue until May 2021).
- The NRW Single Point of Contact (SPOC) remains in place to carry out the weekly reporting. The SPOC will also assist with any other EU Exit related response requirements.
- Strategic Coordination Group (SCG) attendance is now maintained by our usual LRF representatives This approach will remain under review and rotas may need to be stood back up if the situation deteriorates/escalates.

Measure owner/s: Jeremy Parr / Lyndsey Rawlinson

Q1	to Q2	to Q3	Year end
Green	Green	Green	Green

See [here](#) for key used for Red / Amber / Green status
(for all Business Plan dashboard measure reports)

Measure: Implement Covid-19 Renewal programme

Latest position (to end of March 2021):

- Our milestone activity for this period was to **begin to implement recommendations**
- We have substantially met this milestone.
- We have concluded the discovery phase of Renewal, having completed several evidence gathering exercises.
- We have established a clear vision and set of outcomes we want to achieve as NRW and society emerges from the pandemic. These have been reviewed, amended and agreed with Renewal Programme Board, ET, PaRC (People and Remuneration Committee of our NRW Board) , full NRW Board
- We have established a Renewal Delivery Programme to oversee the implementation of Renewal recommendations in 2021/22, and started to implement key recommendations
- We are Green at year end

What we are doing next:

- The Renewal programme will be recommending a series of actions and proof of concept trials that will start NRW's transition to new way of working, and will see secure benefits to
 - Improved staff well-being and resilience
 - Improved productivity and efficiency
 - Improved partnership working through shared work spaces
 - Flexible and resilient ICT
 - Reduced Carbon emissions
 - Commercial opportunities to support local hubs
- There are a series of workstreams, including our HR, ICT, Accommodation, Communications and Engagement and Commercial teams

Measure owner/s: Martin Parkinson

Q1	to Q2	to Q3	Year end
N/A	Green	Green	Green

See [here](#) for key used for Red / Amber / Green status
(for all Business Plan dashboard measure reports)

Key: Red / Amber / Green ratings

The detail of how the Red / Amber / Green (RAG) measure status is determined for each measure in our Business Plan dashboard is shown below. We typically use a common RAG approach for each measure type (e.g. milestones or numeric targets). We only depart from this common RAG approach where necessary, for the specific measure being considered (e.g. using more specific RAG tolerances for numeric targets to be a fair reflection of performance, and to ensure alignment with long-standing performance reporting approaches for these).

Some measures have no pre-set RAG categorisation in place. This is often the case for measures that are new/emerging work areas, or where a pre-set RAG approach would not make sense. RAG ratings for these measures are therefore based on a common-sense reflection approach – i.e. a fair reflection of the position at that time.

Respond to the Climate Emergency

Page	Measure	Type	Red is...	Amber is...	Green is...
6	Climate emergency action across NRW	Milestone	Activity reflected in milestone is not near completion	Activity reflected in milestone is near complete (e.g. expected to be completed a month later than planned)	Activity reflected in milestone is effectively complete
8	Verification of Glastir Woodland Creation grant scheme applications	Numeric	No pre-set Red / Amber / Green rating approach in place, i.e. common-sense approach to Red rating applies, focused on fair reflection of position	No pre-set Red / Amber / Green rating approach in place, i.e. common-sense approach to Amber rating applies, focused on fair reflection of position	No pre-set Red / Amber / Green rating approach in place, i.e. common-sense approach to Green rating applies, focused on fair reflection of position

9	Area of new woodland created on the NRW Estate	Numeric	Figure / target not achieved.	Within 30% of figure / target	Figure / target effectively achieved.
11	Actions undertaken to restore Welsh peatlands	Milestone	Activity reflected in milestone is not near completion	Activity reflected in milestone is near complete (e.g. expected to be completed a month later than planned)	Activity reflected in milestone is effectively complete
13	Complete Natural Resources Wales' review of winter storms	Milestone	Activity reflected in milestone is not near completion	Activity reflected in milestone is near complete (e.g. expected to be completed a month later than planned)	Activity reflected in milestone is effectively complete
14	Maintain flood risk assets in high risk systems at target condition	Numeric	Figure / target not achieved.	Within 30% of figure / target	98% (with integer rounding, i.e. $\geq 97.5\%$ would be green)

Respond to the Nature Emergency

Page	Measure	Type	Red	Amber	Green
17	Biodiversity action across NRW	Milestone	Activity reflected in milestone is not near completion	Activity reflected in milestone is near complete (e.g. expected to be completed a month later than planned)	Activity reflected in milestone is effectively complete
19	Priority actions undertaken on protected sites to	Milestone / Numeric	Q1: Activity reflected in milestone is not near completion	Q1: Activity reflected in milestone is near complete (e.g.	Q1: Activity reflected in milestone is effectively complete

	improve condition of features		Q2-Q4: Figure / target not achieved.	expected to be completed a month later than planned) Q2-Q4: Within 30% of figure / target	Q2-Q4: Figure / target effectively achieved.
20	Actions undertaken on National Nature Reserves on NRW managed land to improve	Milestone / Numeric	Q1: Activity reflected in milestone is not near completion Q2-Q4: Figure / target not achieved.	Q1: Activity reflected in milestone is near complete (e.g. expected to be completed a month later than planned) Q2-Q4: Within 30% of figure / target	Q1: Activity reflected in milestone is effectively complete Q2-Q4: Figure / target effectively achieved.
21	Delivering targeted action for declining species or those on the edge of extinction	Milestone	Activity reflected in milestone is not near completion	Activity reflected in milestone is near complete (e.g. expected to be completed a month later than planned)	Activity reflected in milestone is effectively complete
23	Number of UKWAS Corrective Action Requests and Observations open and progress closing them	Numeric	No pre-set Red / Amber / Green rating approach in place, i.e. common-sense approach to Red rating applies, focused on fair reflection of position	No pre-set Red / Amber / Green rating approach in place, i.e. common-sense approach to Amber rating applies, focused on fair reflection of position	No pre-set Red / Amber / Green rating approach in place, i.e. common-sense approach to Green rating applies, focused on fair reflection of position

24	Support for Welsh Government on Green Infrastructure and advice on using Area Statements	Milestone	Activity reflected in milestone is not near completion	Activity reflected in milestone is near complete (e.g. expected to be completed a month later than planned)	Activity reflected in milestone is effectively complete
26	Implement the Welsh National Marine Plan	Milestone	Activity reflected in milestone is not near completion	Activity reflected in milestone is near complete (e.g. expected to be completed a month later than planned)	Activity reflected in milestone is effectively complete
27	Progress of Marine Protected Area network management actions	Milestone	Activity reflected in milestone is not near completion	Activity reflected in milestone is near complete (e.g. expected to be completed a month later than planned)	Activity reflected in milestone is effectively complete
29	Number of Water Framework Directive (WFD) investigations completed	Numeric	Figure / target not achieved.	Within 30% of figure / target	Figure / target effectively achieved.
31	Progress of our work to reduce pollution from metal mines	Milestone	Activity reflected in milestone is not near completion	Activity reflected in milestone is near complete (e.g. expected to be completed a month later than planned)	Activity reflected in milestone is effectively complete
32	Performance of regulated industrial, waste sites, and	Numeric	Figure / target not achieved.	Within 30% of figure / target	90% (with integer rounding, i.e.

	water quality discharges				>=89.5% would be green)
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Developing and using our evidence with partners to advocate for and deliver SMNR

Page	Measure	Type	Red	Amber	Green
35	Delivery of the programme to create a shared vision for the natural environment for 2050	Milestone	Activity reflected in milestone is not near completion	Activity reflected in milestone is near complete (e.g. expected to be completed a month later than planned)	Activity reflected in milestone is effectively complete
37	Publish State of Natural Resources Report 2	Milestone	Activity reflected in milestone is not near completion	Activity reflected in milestone is near complete (e.g. expected to be completed a month later than planned)	Activity reflected in milestone is effectively complete
39	Use of Area Statements within NRW, informing priorities through joint working	Milestone	Activity reflected in milestone is not near completion	Activity reflected in milestone is near complete (e.g. expected to be completed a month later than planned)	Activity reflected in milestone is effectively complete

Developing NRW into an excellent organisation that serves the communities of Wales

Page	Measure	Type	Red	Amber	Green
42	Incident Assessment (within 1 hour)	Numeric	Figure / target not achieved.	Within 30% of figure / target	95% (with integer rounding, i.e. >=94.5% would be green)

43	Response to 'High category' incidents (within 4 hours)	Numeric	Figure / target not achieved.	Within 30% of figure / target	95% (with integer rounding, i.e. $\geq 94.5\%$ would be green)
45	Develop our approach to engaging and working with stakeholders	Milestone	Activity reflected in milestone is not near completion	Activity reflected in milestone is near complete (e.g. expected to be completed a month later than planned)	Activity reflected in milestone is effectively complete
46	Support Welsh Government's Tourism Action Plan by promoting Wales Coast Path and National Trails	Milestone	Activity reflected in milestone is not near completion	Activity reflected in milestone is near complete (e.g. expected to be completed a month later than planned)	Activity reflected in milestone is effectively complete
48	Develop our NRW workforce plan, progressing priority actions	Milestone	Activity reflected in milestone is not near completion	Activity reflected in milestone is near complete (e.g. expected to be completed a month later than planned)	Activity reflected in milestone is effectively complete
49	Review our Equality Impact Assessment process	Milestone	Activity reflected in milestone is not near completion	Activity reflected in milestone is near complete (e.g. expected to be completed a month later than planned)	Activity reflected in milestone is effectively complete
51	Progress towards Corporate Health Gold Standard	Milestone	Activity reflected in milestone is not near completion	Activity reflected in milestone is near complete (e.g. expected to be	Activity reflected in milestone is effectively complete

				completed a month later than planned)	
52	Number of employee near misses and lost time incidents	Numeric trend	No pre-set Red / Amber / Green rating approach in place, i.e. common-sense approach to Red rating applies, focused on fair reflection of position	No pre-set Red / Amber / Green rating approach in place, i.e. common-sense approach to Amber rating applies, focused on fair reflection of position	No pre-set Red / Amber / Green rating approach in place, i.e. common-sense approach to Green rating applies, focused on fair reflection of position
54	Progress customer programme – increasing customer involvement	Milestone	Activity reflected in milestone is not near completion	Activity reflected in milestone is near complete (e.g. expected to be completed a month later than planned)	Activity reflected in milestone is effectively complete
55	Review and define all funding mechanisms available to NRW, ensuring alignment	Milestone	Activity reflected in milestone is not near completion	Activity reflected in milestone is near complete (e.g. expected to be completed a month later than planned)	Activity reflected in milestone is effectively complete
57	Publish NRW Commercial Strategy	Milestone	Activity reflected in milestone is not near completion	Activity reflected in milestone is near complete (e.g. expected to be completed a month later than planned)	Activity reflected in milestone is effectively complete
58	Timber volume offered to market / sold / dispatched	Numeric	Figure / target not achieved.	Within 30% of figure / target	Figure / target effectively achieved.

Responding to the Covid-19 pandemic and the UK Leaving the European Union, taking opportunities for a green recovery

Page	Measure	Type	Red	Amber	Green
61	NRW's contribution following EU Exit	Text update	No pre-set Red / Amber / Green rating approach in place, i.e. common-sense approach to Red rating applies, focused on fair reflection of position	No pre-set Red / Amber / Green rating approach in place, i.e. common-sense approach to Amber rating applies, focused on fair reflection of position	No pre-set Red / Amber / Green rating approach in place, i.e. common-sense approach to Green rating applies, focused on fair reflection of position
63	Progress of NRW's preparedness for any potential incidents or issues following EU Exit	Text update	No pre-set Red / Amber / Green rating approach in place, i.e. common-sense approach to Red rating applies, focused on fair reflection of position	No pre-set Red / Amber / Green rating approach in place, i.e. common-sense approach to Amber rating applies, focused on fair reflection of position	No pre-set Red / Amber / Green rating approach in place, i.e. common-sense approach to Green rating applies, focused on fair reflection of position
64	Implement Covid-19 Renewal programme	Milestone	Activity reflected in milestone is not near completion	Activity reflected in milestone is near complete (e.g. expected to be completed a month later than planned)	Activity reflected in milestone is effectively complete



Board Paper

	Paper Details
Paper title:	Business Plan 2022-23
Paper Reference:	21-07-B13
Paper sponsored by:	Prys Davies, Director of Corporate Strategy & Development
Paper Presented by:	Caroline Hawkins, Corporate Planning, Performance & Strategic Assessment Manager
Purpose of the paper	Scrutiny/decision
Recommendation	The Board are invited to:– <ul style="list-style-type: none">• comment on the proposed approach• approve the strategic priorities for 2022-23

Issue

1. This paper sets out the outline process and timetable that Corporate Planning and Finance teams propose to follow in developing the Business Plan for 2022-23.
2. Following suggestions at ET on 15 June we have introduced a revised list of strategic priorities in the table below for 2022-23 and we welcome the Board's comments on these.

Background

3. The 2022-23 Business Plan will be the last annual plan delivering against the Corporate Plan which runs to March 2023. It will also be the first Business Plan prepared as we build our recovery beyond the Covid-19 pandemic and begin to embed any changes and expectations of our work post EU Exit. The business planning process therefore needs to consider how these areas of work are factored in as 'day job' alongside the delivery of our strategic priorities through the Area Statements.
4. We recognise that the political context has shifted with the new Programme for Government (PfG) published on the 15th June. There is a very strong commitment to

the nature and climate emergencies by the First Minister and a recognition of the importance of practical and innovative action. The 10 well-being objectives are listed in annex 1.

5. We will receive a new remit letter and are awaiting confirmation of when we'll receive it. Until that clarification we are reviewing the detail within the 10 objectives in the PfG and considering the implications and opportunities for NRW to deliver Welsh Government's objectives. This will inform the Baseline Exercise due for submission at the end of July. To inform the preparation of the 2022/23 Business Plan, we will be closely monitoring the situation to identify what might need to change and/or if the strategic priorities need adjustment.
6. We will work closely with Finance and the Programme Management Office (PMO) to ensure that processes for budget setting and project bidding have appropriate governance in place and clearly align to our strategic priorities. Our planning is also informed by the baseline exercise work that is ongoing
7. Pending final edits to the 21-22 Business plan, a lessons learned exercise was carried out with Leadership Team Group (LTG), Heads of Business, Heads of Place and the Corporate Planning & Performance (CP&P) team. The main learning points from this exercise regarding the 2021-22 Business Plan were:
 - Setting the strategic priorities earlier helped inform the planning from the outset;
 - Continue with early engagement using the project management approach with a clear timeline so that other parts of the Business know what is expected of them and when;
 - Following recommendations from the Internal Audit of the Corporate Performance Dashboard we will also make performance measures SMARTer with clear standards set out at the start of the process;
 - Continue to embed the links and timing between Service and Place Plans with the Annual Business Plan to maintain engagement with HoB.
8. We expect this business planning and budget exercise to be challenging. Many of our services are reliant on 'temporary' funding from Welsh Government and we are also utilising the high timber income levels which we know is cyclical. Clarity on funding from Welsh Government following the baselining exercise will be crucial.

Assessment

9. We will continue with a project team approach including a representative from each of the Business Boards so that they are fully involved and engaged throughout the process.
10. In line with the action from the Corporate Performance Dashboard Internal Audit we will develop a SMART guide to inform the development of the performance measures that will support the new annual business plan. We plan to share this with Business Boards in July.

11. We are starting to work out the detailed work programme and anticipate ET involvement to be:

- June-August – Baseline Exercise, begin discussions on funding and priorities with Welsh Government.
- June – Set strategic priorities for 2022-23 and approve Business Plan and budget outlook.
- September to January – Compile draft Business Plan, budget and performance measures with Business areas and Directorates, prioritising and aligning to available funding.
- February – Endorse final Business Plan and performance measures

We expect Finance Committee (FC) involvement to be:

- July – review progress on Baseline Exercise, comment on business plan timeline, budget outlook and strategic priorities for 2022-23
- Autumn - Review progress of overall Baseline Exercise
- February – Review final Business Plan, Performance Measures & budget position

The NRW full Board involvement would be:

- July – Approve priorities for 2022-23
- January – Review draft Business Plan, Performance Measures & budget position
- March – Approve final Business Plan, and Performance Measures

12. We anticipate the layout and style of the Business Plan will be the same as the current plan, although some strategic priorities may need a review.

Following recommendations made by ET on 15 June we have revised the current strategic priorities and for 2022-23 we propose the following:

Current 2021/22 priorities	Proposed Priorities 2022/23	Justification for change
Responding to the climate emergency	Responding to the climate and nature emergencies, focussing on Nature Based Solutions and Decarbonisation	COP15 & 26 likely to place a significant focus on joint action to tackle climate and nature emergencies and role of NBS. IPPC & IBES Report June 10th, 2021 importance of tackling climate and nature emergencies together.
Responding to the nature emergency		
Developing and using our evidence with partners to advocate for and deliver the sustainable management of natural resources	Developing and using our evidence and technical expertise to inform decision makers, ensuring that the long-term impacts of biodiversity loss and climate mitigation and adaptation are explicitly considered.	Ensures our wider work on biodiversity is not lost. Makes visible our routine work to advise decision makers - Ministers, officials, other public bodies, business on a wide range of environmental topics and the interface with the permitting and planning service.
Developing NRW into an excellent organisation that supports the communities of Wales	Developing NRW into an excellent, values- driven organisation, that drives a strong internal performance culture and delivers value for money for the people of Wales	A shift of emphasis to reflect the organisation-wide priority of internal performance
Responding to the Covid-19 pandemic and the UK leaving the European Union, taking opportunities for a green recovery	Work with communities, stakeholders and external partners to support a Green and Just Recovery.	A Green & Just recovery is a major theme of the Programme of Government. Benefits of nature to well-being a central element of SoNaRR and SMNR. Alignment with our customer & diversity strategies.

Nested hierarchy – mapping things out

Proposed priorities 2022/23	Illustrative topics that nest within the priority
<p>Responding to the climate and nature emergencies, focussing on Nature Based Solutions</p>	<ul style="list-style-type: none"> • Green space in urban and peri-urban areas • Protected Sites Restoration Programme • Woodland Restoration & Creation Programme • Peatland Restoration Programme • Marine Programme • River & Wetland Restoration Programme • Carbon Positive Programme
<p>Using our evidence and technical expertise to inform decision making, including regulatory enforcement and investment, ensuring that the long-term impacts of biodiversity loss and climate mitigation and adaptation are explicitly considered by others.</p>	<ul style="list-style-type: none"> • Permitting advice and determination • Regulatory compliance and enforcement • Planning advice • Advice to WG • Flood risk management and planning • Advice to PSBs & Health Boards
<p>Developing NRW into an excellent, values driven organisation that drives a strong internal performance culture and delivers value for money for the people of Wales</p>	<p>Covers the new Corporate Performance Management metric including:</p> <ul style="list-style-type: none"> • Internal controls • Staff • Finance • Developing workforce • Customers • Comms • Adfywio • WH&S • PMO
<p>Work with communities, stakeholders and external partners to support a Green and Just Recovery.</p>	<ul style="list-style-type: none"> • Recreation opportunities on the NRW estate • Commercial and community opportunities on the NRW estate • Support to WG on the NRP • Working with PSBs on the development of Well-being assessments and Plans • Vision 2050/ Nature and Us • Adfywio

Recommendation

13. The Board are invited to comment on the anticipated points for the full Board involvement. Are they proportionate and are these the stages of the process at which the Board would wish to be involved?
14. Does the Board approve the proposed approach and timeline?
15. The Board are requested to give a steer on the following questions:
 - Do the current strategic objectives give a balanced, strategic view of what is important for NRW in 2022/23?
 - What revisions, if any, are needed to the strategic priorities for the next Business Plan?

Key Risks

16. The ongoing situation with the Covid-19 pandemic and EU Exit may continue to have an impact for the next financial year and the baseline exercise with WG. We have relied on temporary sources of funding to help meet our strategic priorities – these programmes no longer exist.
17. Our funding streams could all be impacted by a longer-term recovery from the Covid-19 pandemic.

Next steps

July - Development of the full project timeline

July-Aug - Begin development of Business Board annual service plans

Financial Implications

18. Resources are in place to carry out the routine Business and Financial planning.

Equality impact assessment (EqIA)

19. An EqIA is in place for the Corporate and Business Plan.

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Annex 1 – Themes in the Programme of Government

Annex 1 – Themes in the Programme of Government

- Provide effective, high quality and sustainable healthcare.
- Continue our long-term programme of education reform, and ensure educational inequalities narrow and standards rise.
- Protect, re-build and develop our services for vulnerable people.
- Celebrate diversity and move to eliminate inequality in all of its forms.
- Build an economy based on the principles of fair work, sustainability and the industries and services of the future.
- Push towards a million Welsh speakers, and enable our tourism, sports and arts industries to thrive.
- Build a stronger, greener economy as we make maximum progress towards decarbonisation.

Board Paper

	Paper Details
Paper title:	Welsh Language Annual Report 2020 - 2021
Paper Reference:	21-07-B14
Paper sponsored by:	Prys Davies, Executive Director of Corporate Strategy and Development
Paper Presented by:	Lyn Williams, Specialist Advisor, People Management
Purpose of the paper	Scrutiny/Decision
Recommendation	To approve the Welsh Language Annual Report for 2020/21 and proposed Action Plan

Issue

1. The Board is asked to approve the Welsh Language Annual Report for 2020/21 in line with the requirements of our Standards and approve the proposed Action Plan found in Appendix 1 of the report.

Background

2. The Welsh Language (Wales) Measure 2011 established a legal framework to impose Welsh Language Standards on some public organisations, and NRW has a duty to comply. Our Welsh Language Standards became operational for our organisation on 25 January 2017.
3. We have a duty to produce and publish an Annual Report under our Welsh Language Standards policy. This paper updates the Board on the work which has taken place over the last financial year to implement our policy and improve our Welsh language services and asks the Board to approve our Annual Report for 2020/21.
4. The Board is also asked to approve our Action Plan for 2021/22 for implementing, maintaining and improving our Welsh language services for the future.

Summary

5. Key highlights from the Welsh Language Annual Monitoring Report 2020/2021 (Annex 1):
- Over the year we have increased the number of fluent Welsh speakers by 49 through external recruitment. The percentage increase from last year does not reflect this due to the increase in our overall staff numbers. Information on the language skills of staff can be found in Appendix 4 of the report.
 - 161 members of staff have attended Welsh language training at various levels. This is down by 36 from last year; however, 56% (90) of the current learners have started learning Welsh this year. During the initial stages of lockdown we moved the courses online, enabling staff to continue in developing their language skills. Feedback from staff has been extremely positive, for the future online courses are likely to continue to be offered with the occasional face to face to help staff in consolidating their learning. This will provide staff with more options in how they chose to develop their language skills to suit their learning style. Information on our Training Programme can be found in Appendix 3 of the report.
 - All new staff who attend the Induction course receive a presentation to raise awareness of our Welsh Language Standards. The presentation helps new staff understand what our legislative duties are, and what support is in place to help all our staff work bilingually.
 - With Covid-19 restrictions in place all events and meetings have moved online. We have continued to hold several public bilingual events and meetings examples of good practice can be found in the report.
 - Along with 120 Welsh public organisations, we took part in the Welsh Language Commissioner's Welsh language campaign on 6th December to promote the rights of Welsh speakers.
 - Over the year we promoted the language and culture of Wales by organising events at the online National Eisteddfod in August 2020, Shwmae Day October 2020, Santes Dwynwen Day January 2021 and St David's Day March 2021.
 - Two complaints were received from members of the public relating to the standards over the last year, this is down from five complaints received the previous year. We dealt directly with the complainant on both occasions to resolve the matter raised.

Raising Awareness of Welsh Language Standards:

Over the last year Managers have been asked to raise awareness of: -

- The need to consider translation requirements at the beginning of a project, allocating enough time for translation prior to publication of information.
- When arranging online meetings, the same consideration to be given to Welsh language requirements as when holding face to face meetings.
- E-mail messages or instructions to all staff or large groups of staff should be bilingual in line with our internal language policy.
- Information on our policy and guidance to help all staff work bilingually and where guidance and support can be found on the Welsh language page of the intranet. Guidance are available to help with: Correspondence, Telephone and Communication, Meeting and Events, Reception Desks and Facilities, Staffing and Recruitment, and Translation.

- Welsh language considerations' questions in our Equality Impact Assessment have been reviewed and will help identify any issues and ensure more positive impacts and opportunities for people to use the language, helping to mitigate or lessen negative impacts identified as part of our decision-making processes. This is a requirement of Standards 84 – 86.

Improving our Welsh language services:

- In October 2020, we refreshed our website design to make it easier and quicker to use, ensuring that the design was fully compatible with the Welsh language. Visitors to our website are asked to choose their preferred language. Around 1% of website visitors to our flood warning webpages select the Welsh language.
- Around 3% of callers to Floodline select the Welsh language and around 2% of callers then listen to live flood warning information in Welsh.
- Previously our MyNRW all staff system would not allow staff to record absences in Welsh. We have now been able to update the system to ensure that staff absences are available in both Welsh and English.
- Microsoft Teams was introduced at the end of 2020 for holding online meetings both internally and externally. All the training content and guidance for staff is available in Welsh. This system allows for breakout groups in the same way as face to face meetings allowing for facilitation of Welsh groups online.
- For the first time we have undertaken specific Welsh language user research to inform the development of future digital services and we are also actively involved with the Centre for Digital Public Services' network for bilingual service design.
- We are in the process of reviewing our Translation Service and in the process of developing a team that will be sustainable and help improve our services for the future.

Planned work in 2021/2022

- Discussions have been held with Welsh Government and The Welsh Language Commissioner on developing a long-term Strategy for the Welsh language for NRW. Our Executive Director of Corporate Strategy and Development, Head of Communications and External Relations and Head of Organisation Development are attending Academi Wales course on developing and transforming organisation cultures to support the day-to-day use of Welsh. This course continues into 2021-22 and will help to inform the development of our own Welsh Language strategy.
- Welsh Language Action Plan for 2021/2022 can be found in Appendix 6 of the report.

Recommendation

6. The Board are asked to approve the Annual Report in Annex 1 and the Action Plan for the Welsh Language over the next year found in Appendix 6 of the report.

Key Risks

7. Failure to produce a Welsh Language Annual Monitoring Report will be breaking our legal duty within our compliance notice.
8. Failure in providing a Welsh language service will result in providing a poor customer service to a proportion of the population of Wales and failing to act as an inclusive

organisation, resulting in complaints to the Welsh Language Commissioner who will conduct investigations into our failure to comply with our legislative requirements.

9. Risks of non-compliance can be found on page 20 of the Annual Report.

Next Steps

10. Upon approval, the report will need to be amended to include any recommendations made by The Board. The report will need to be translated and published on our website by end of September 2021 as part of our legislative requirements.

Financial Implications

11. Implementation of the Standards will continue from current budgets; there will be costs in translating information on the Fishing Licence Purchasing webpages to ensure compliance.

Equality Impact Assessment (EqIA)

12. An Equality Impact Assessment was carried out on the Welsh Language Standards as part of the development of the policy in 2016.

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Annex 1 – Welsh Language Annual Report 2020/2021

Welsh Language Annual Report 2020 – 2021

This report is available in both English and Welsh on our website at [Natural Resources Wales Welsh Language Standards](#)

If you require a hard copy of the report or a copy in a different format for example large print, audio version please contact: Email address: iaithgymraeg@naturalresourceswales.co.uk

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Executive Summary

Welcome to our Annual Report for 2020-2021. This report focuses on how we have implemented the policy and work to improve our Welsh language services, in line with the requirements in our Welsh Language Standards, over the reporting period.

Over the last twelve months due to Covid-19 some of our services have needed to be delivered differently, this included our Welsh language services. Fortunately, as most of our services are available in Welsh on-line or over the telephone the pandemic had a limited impact. Using technology, we have been able to facilitate meetings on-line and provide translation facilities as we would in normal face to face meetings.

Following their monitoring of our compliance with the Standards we received positive feedback from the Welsh Language Commissioners Office at our Annual meeting. There were areas which we remained non-compliant and reported as risks in the 2019-20 Annual Report, the work we have carried out to address these areas are included as part of this report.

Business Continuity Plans were updated in light of the pandemic, to ensure resilience. Welsh language considerations formed part of the updated plans, ensuring wherever possible and reasonable we were able to provide our customers with a language choice as normal and fulfilling our legislative requirements.

All our face to face Welsh language training courses moved online, not being able to have informal chats with fluent Welsh speakers on a day to day basis has impacted on our staff in practising their Welsh language skills. To help our learners we have organised Mentors who meet with learners via Microsoft Teams to practice language their skills.

The Welsh Language Commissioner understood that at times public organisations needed to provide advice and information to the public quickly, and let organisations make decisions about using the Welsh language when sharing emergency information, considering the circumstances and nature of the situation. With the plans we had in place for ensuring that public information was given priority we were able to provide the information in Welsh as normal throughout this period.

The Welsh language forms part of NRW's identity, we respect the language preference and identity of our customers, by being proactive in offering a language choice. We have Welsh speakers in most of our teams and workplaces with the majority based in our Operational Teams who deal with the public daily as part of their work.

24% of our staff are fluent Welsh speakers. Our aim is to increase opportunities for our Welsh speakers and learners to use the language daily externally and internally, and we will be developing a Welsh Language Strategy to help facilitate this.

We will continue our vision to develop into a naturally bilingual organisation by taking opportunities to recruit Welsh speakers through our recruitment process and encouraging and supporting staff to develop and use their language skills "**araf bach a phob yn gam**"

(slowly but surely) as we increase our capacity and capability to provide a bilingual service across the organisation.

Introduction

The Welsh Language Standards came into force for NRW on 25th January 2017, under the Welsh Language (Wales) Measure 2011 and regulated by the Welsh Language Commissioner under Welsh Language Standards (No. 2) Regulations 2016.

Aim of the Standards are: -

- Provide a better and more consistent Welsh language service to Welsh speakers.
- Make it clear to Welsh speakers' what services they can expect in Welsh.
- Make it clear to public organisations what their duties are in relation to the Welsh language.
- Ensure that the Welsh language is treated no less favourably than the English language.

This report demonstrates how we have implemented the standards and the work we have done to improve our Welsh language services during the reporting year 2020/21.

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Implementing the Welsh Language Standards

The standards we are required to comply with are in four categories: -

Service Standards - the Welsh language services we provide to the public.

Policy Standards - ensuring that Welsh language forms part of the decision-making process by carrying out Equality Impact Assessments ensuring that the decision has no adverse effect, but positive or increased effects on the opportunities to use the Welsh language.

Operational Standards - promoting and facilitating the Welsh language in our internal administration processes.

Record Keeping Standards - keeping records for compliance with the requirements of the standards in areas such as staff Welsh language skills, training, complaints and recruitment.

Implementing and Improving our Welsh Language Standards and Services

Managers Updates

- . Over the last year Managers have been asked to raise awareness of the need to: -
- consider translation requirements at the beginning of a project, allocating enough time for translation prior to publication of information.
 - giving the same consideration to Welsh language requirements as when holding face to face meetings.
 - ensure all staff E-mail messages or instructions should be bilingual in line with our internal language policy.
 - refer to the guidance and support on Correspondence, Telephone and Communication, Meeting and Events, Reception Desks and Facilities, Staffing and Recruitment and Translation.
 - consider Welsh language in Equality Impact Assessments to ensure that our work does not have any effect on a person's ability to use the Welsh language with us both internally and externally.

Grŵp Pencampwyr

Our Grŵp Pencampwyr Iaith Gymraeg (Welsh Language Champions Group) has a representative from each Directorate. Meetings take place every quarter and Pencampwyr will contact the Welsh Language Advisor as and when required. The Terms of Reference have been updated over the year as listed below.

The Pencampwyr act as a liaison between the Directorates and Welsh Language Policy Advisor helping to raise awareness and address issues as they arise.

Service Standards

Customer Care Centre

Our Customer Care Centre deal with all incoming calls to the organisation. Over the last year up to 31st March 2021 the Centre dealt with a total of 21,255 calls of which 5.7% 1221 were Welsh calls.

Despite all our call handlers at the Centre being fluent Welsh speakers, a number of callers choose the English option initially and when speaking to our call handlers who greet the callers bilingually will then continue the conversation in Welsh. This pattern seems to be similar to callers to the Floodline (see Table 1).

To address this, we are discussing with the Welsh Language Commissioner whether we can remove the language choice option provided to customers. All our call handlers speak Welsh and answer bilingually, this will not only raise the statistics of our Welsh medium calls but also provide a proactive natural bilingual service to all our customers. We would need to find another way of recording language preference for statistical purposes.

Customer Relationship Management Record System

Our Customer Relationship Management Recoding system is used to record the language preference of our customers. Areas of the business that deal with the public on a regular basis have access to the system. Work is underway over the next 12 – 18 months in developing this system and making it available for recording to more of the business.

Meetings and Events

With Covid-19 restrictions in place, all events and meetings have moved online. We have continued to hold several meetings and organised bilingual events and ensured that the meetings and events have been run bilingually by: -

- Planning and discussing Welsh language considerations in the early stages of planning
- Using Tocyn Cymru bilingual online event booking system and requesting language choice of participant
- Arranging for all presentations to be bilingual
- Ensuring a Welsh speaking Chair to open and close event
- Welsh speaking facilitators in each break-out group
- Welsh medium break-out group
- Questions asked in the chat facility were answered bilingually

Education and Health Team – Training Events

Between October 2020 and January 2021, 1,223 people from the education sector participated in online training provided by the team, with 405 receiving training through the medium of Welsh. The training is to help those working in the sector to have the knowledge and confidence in teaching in the outside environment and in using the correct Welsh names and terms. This work contributes to the WG Cymraeg 2050 Strategy Action Plan, to have more educators being able to teach confidently through the medium of Welsh for the future.

Feedback from the attendees of these events was very positive, noting how much it was appreciated the proactive natural offer of Welsh throughout the event, allowing participants to participate in their preferred language. Ensuring Welsh language considerations from the start of planning, ensured that events ran smoothly, but also the needs of the customer formed part of those considerations from the outset.

More information can be found on the work the team have done in relation to the Welsh language in **Appendix 1** of this report.

Microsoft Teams

Microsoft Team was introduced at the end of 2020 for holding online meetings both internally and externally.

- All the training content and guidance for staff is available in Welsh.
- This system allows for breakout groups in the same way as face to face meetings allowing for facilitation of Welsh groups online.
- Conference backgrounds have been created which include the Cymraeg logo for staff who are Welsh speakers to use in online meetings with others to identify themselves as Welsh speakers.
- Dysgwr Cymraeg conference backgrounds have also been created for our staff who are learning to speak Welsh and feel confident enough to use their Welsh language skills in meetings with others online.

The intention is to hold all information in relation to Welsh language capabilities of our ICT systems in one place. This will help staff in understanding which of our systems can be used in Welsh.

Place Names & Signage

Signage and Welsh language guidance are published on the intranet to help ensure that all permanent and temporary signage are bilingual and checked by our Translation team for accuracy in terms of meaning and expression.

All new signage at our recreation sites requires authorisation from our Specialist Advisor Visitor Experience and our Graphic Design Specialist, both ensure that signage are in line with our branding policy and bilingual with the Welsh text to be seen above or to the left of the English text. Any new infrastructure we create is given either a Welsh or bilingual appropriate name to reflect the infrastructure, site and history of the area.

As an organisation we often refer to topographical features on signage and interpretation panels on our sites. Over the next year we will review our signage guidance to ensure that the correct standard form is used but also to raise awareness of the meaning and how the descriptive language used in Welsh links back to how the land/place was used in the past, forming part of language heritage and an important element of our landscapes to be protected for the future. This work is included in our Action Plan for 2021/22 found in **Appendix 6**.

Accessible Microsoft Templates

The Microsoft Templates used by staff in drafting letters, minutes, reports, agendas and paper etc have been updated to ensure they are accessible and bilingual. As part of the update the letterhead template includes Welsh language considerations to help ensure staff correspond initially with others bilingually if no language preference is known.

Our Translation Guidance for staff has been updated to reflect these changes.

Social Media

NRW's corporate social media accounts on Twitter, Instagram, Facebook and Linked In are managed centrally by the Communications team who ensure that all content is updated simultaneously in both Welsh and English. There are also a number of Twitter accounts operated and managed by members of staff who post in a professional capacity. During our annual feedback meeting with the Welsh Language Commissioner's Office it was highlighted that some of these accounts did not always meet the requirements of standards 54-55 which requires that we publish all messages bilingually.

Following a review of these accounts, we are looking to identify those who post regularly and provide translation support. This is part of a wider planned review of our social media platforms where one option under consideration is for accounts to be managed and operated bilingually by the place-based Communications Officers and supported by the local operations team. Over the summer months training sessions will be held with staff involved to develop this plan, where the Welsh language requirements will be underlined.

Flood Warning & Informing Services

The flood warning service comprises the messages we send by phone, SMS or email in Welsh or English as requested by the recipient. These warning messages are complemented by the following services

- *Floodline 0345 988 1188* – a local rate call service where callers can listen to live flood information, listen to pre-recorded advice and also speak to a trained call agent to report flooding or register to the flood warning service
- *5 Day Flood Risk for Wales* webpage - where we provide a summary of potential flood risk across wales for the next 5 days [weblink](#)
- *Flood Warnings & Alerts* webpage - we provide details of all warnings in force along with live flood information [weblink](#)
- Each of these services are available in Welsh or English.

Floodline

In July 2019, we improved the Floodline call plan to make it easier for callers to access our Welsh language services by including a Welsh language call agent service during weekday daytime hours. Outside these hours, or if a Welsh speaking call agent is unavailable, callers are given the option of leaving a message requesting a call back in Welsh, or to be diverted to an English-speaking call agent instead,

The table below shows a decline from 3.2% to 2.7% of callers to Floodline select the Welsh language service. Conversely there has been an increase by 1.2% of callers listen to live flood warning information in Welsh.

	2019-2020		2020-2021	
	Cymraeg	English	Cymraeg	English

Floodline callers – language choice	276 (3.2%)	8,418	234 (2.7%)	5,504
Floodline callers – pre-recorded live warning information	87 (1.3%)	6,513	93 (2.5%)	3,680
Floodline callers – calls to Agents	0	1,136	0	1,031

Table 1: Callers to Floodline

NRW Website – Flood Warnings, Alerts and Flood Risk Services

In October 2020, we refreshed our website design to make it easier and quicker to use, ensuring that the design was fully compatible with the Welsh language.

Visitors to our website are asked to choose their preferred language and the table below shows that there has been an increase in visitors to our Welsh language flood warning webpages.

	2019-2020		2020-2021	
	Cymraeg	English	Cymraeg	English
Flood Warnings & Alerts webpage views	10,257 (0.95%)	1,067,767	9,362 (1.3%)	698,750
5 Day Flood Risk for Wales webpage views	489 (0.73%)	66,570	784 (0.5%)	154,779

Table 2: NRW Webpage Views

Future Plans

Floodline - We are planning to improve this service by developing a Welsh language call agent service – available regardless of time or day by diverting callers to NRW staff in our Incident Communications Centre, with call overflow to English language call agents if required.

Flood Warning Message & Website - A key element of our service is to provide real-time information to help people understand their immediate flood risk. This requires the ability to accurately translate information in Welsh. We are planning to explore options for developing this translation capability so that we can provide richer, more helpful information – noting there is little room for translation error in a potentially life-saving service.

Warning service - Less than 1% of our warning recipients have registered to receive information in Welsh. On completion of the Floodline improvement we plan to carry out activities to promote our Welsh language offering to increase their use.

Website

As part of our work in ensuring the website is accessible to all, with more content being published as webpages, this has increased the information available on the website in Welsh. The Team also monitors compliance with the Standards, ensuring information is published bilingually.

For the first time we have undertaken specific Welsh language user research to inform the development of future digital services and we are also actively involved with the new Centre of Digital Public Services, who have developed new standards for digital services. We are part of the community of practice, sharing updates about how we're starting to test new designs in Welsh so that we design bilingual services that people choose to use. Statistics on numbers who have accessed our website in Welsh can be found in **Appendix 2** of this report.

Policy Making Standards

Equality Impact Assessment

During the last year our Business Plan Dashboard Measures included reviewing our Equality Impact Assessment and guidance. Welsh language forms part of considerations within the assessment as is the requirement of Standards 84, 85 and 86.

New questions and guidance have been drafted to help staff understand the impact that the proposal could have on opportunities for people to use the Welsh language when completing the assessment, by:-

- considering the linguistic nature of the community, area and locality the proposal could affect.
- ensuring that we are proactive in providing a real language choice and how people access and use all our services
- ensuring that the languages are treated equally and that the services are always available in both languages to the same standard
- considering are there any opportunities to preserve, promote and enhance local culture and heritage, or encourage people to learn the language as part of the proposal
- same above considerations should also be given to any proposals we do in our internal administration, providing more opportunities for staff to work through the medium of Welsh if they so wish.

The requirement to complete and Equality Impact Assessment is embedded into our Project Management Toolkit and a requirement for any new or amended proposal needing Board approval as part of our governance procedures.

Operational Standards

All new staff attend an Induction course and receive a presentation to raise awareness of our Welsh Language Standards, internal language policy and Welsh language training programme as a requirement of Standards 127, 128 and 129. The presentation helps new staff understand what our legislative duties are, and what support is in place to help all our staff work bilingually.

The Induction is compulsory for all new staff with 257 attending 3 face to face courses and 6 online due to Covid-19 restrictions during this reporting period.

Line Managers are required to go through a checklist with each new member of staff our Welsh Language Standards policy and guidance are included on the list. Line Managers are asked to ensure all new staff have bilingual e-mail signatures as well as a bilingual out of office message. Each new member of staff is also asked to self-assess their language skills and record in MyNRW as part of the process. This checklist is signed by the Staff member and Line Manager and sent to our People Services for filing. People Services send out a reminder every six months to Line Managers who have not completed the checklist.

Welsh Language Training Programme

Within the last year, the working day has drastically changed as most staff were directed to work from home due to Covid-19. Given the turmoil that COVID created and the adjustments staff had to make, many learners will look at re-joining the training programme once the restrictions ease.

During the initial stages of lockdown we moved the courses online, enabling staff to continue in developing their language skills. There was a need to take into account the added concentration required online, reasonable expectations of learners given some added responsibilities and the need for more regular breaks during the lessons.

Feedback from staff on the online training has been extremely positive, for the future online courses are likely to continue to be offered with the occasional face to face to help staff in consolidating their learning, This will provide staff with more options in how they chose to develop their language skills to suit their learning style.

161 members of staff have attended Welsh language training at various levels. This is down by 36 from last year; however:

- 56% (90) of the current learners have started learning Welsh this year.
- Most of our learners are based in North West Wales 24% (38) and Gwent 24% (38).
- 18% (29) of our learners are or near being fluent Welsh speakers.
- If the (17%) 28 who are currently learning at Intermediate level continue learning Welsh, they will become fluent Welsh speakers 3 to 4 years.

We will continue to encourage staff to develop their language skills at all levels,

More information can be found on our Welsh language Training in **Appendix 3** of this report.

MyNRW

Standard 100 requires that staff are able to record absences in Welsh. We have now been able to update the system to ensure that staff absences are available in both Welsh and English.

Recruitment

The Recruitment policies and procedures have been reviewed including Welsh language considerations. The changes explain our responsibilities more clearly to recruitment managers in ensuring that candidates have a right to apply and be interviewed through the medium of Welsh, and that Welsh speaking interview panel members must be arranged to carry out Welsh medium interviews in line with the requirements of standards 134.

Microsoft Templates

We have a brand manual in place which includes Microsoft templates staff are required to use for documents and letters etc. These have been updated over the year and the letterhead template includes Welsh language considerations when corresponding with others. This will help to ensure that staff correspond bilingually when unsure of the language preference of others and a requirement of Standard 7.

Record Keeping Standards

Compliance with Welsh Language Standards

Our Welsh Language Standards require that we publish an annual report detailing:

1. The number of employees who have Welsh language skills at the end of the year in question on the basis of the records kept in accordance with standard 145

Our records show that 24% (535) of our staff are fluent Welsh speakers, 13.9% (310) fluent in both spoken and written Welsh. Over the year we have increased the number of fluent Welsh speakers by 49 through external recruitment. The percentage increase from last year does not reflect this increase due to the increase in our overall staff numbers.

We have fluent Welsh speakers at Level 4 and 5 in each of our Directorates who can provide a bilingual service, with the majority (330), based within our Operations Directorate. This is the area of the business which comes into contact and deals with the public, landowners and stakeholders on a regular basis. Having fluent Welsh speakers based across the whole of the Directorate is important in building those important relationships and trust, respecting the language choice of those we deal with.

Our latest statistics found show that the language skills of our workforce have increased from last year as follows: -

Level 1 = 915 (up by 90)

Level 2 = 438 (up by 26)

Level 3 = 153 (up by 17)

Level 4 = 225 (up by 14)

Level 5 = 310 (up by 35)

Over the three years the language ability of our workforce is increasing at each level with 95.1% of staff being able to show linguistic courtesy of meeting and greeting others bilingually. This is also the minimum level required of all our staff within the organisation.

More information on the Welsh language skills of staff can be found in **Appendix 4** of this report.

2. The number of staff who attended training courses offered in Welsh during the year on the basis of the records kept in accordance with standard 146. If a Welsh version of a course was offered during the year, the percentage of the total number of staff attending the course who attended the Welsh version on the basis of the records kept in accordance with standard 124.

Over the last year a high number of courses were cancelled due to the Covid-19 restrictions. Technical online courses have continued as normal as have our

corporate mandatory training courses. During this reporting period we did not provide any training for the following courses which are the requirements of Standard 124 in Welsh or English, we will aim to run courses over the next year: -

- recruitment and interviewing
- performance management
- complaints and disciplinary procedures
- induction
- dealing with the public
- health and safety

The Learning and Development Team are in the process of amending their processes and procedures in relation to booking onto courses. The new form for booking courses will ask staff their language preference for attending the course. When it is found that a cluster of staff wish to attend a Welsh medium course the team will look to provide that specific course in Welsh providing a Welsh speaking training provider can be found.

3. The number of new and vacant posts advertised during the year which were categorised as requiring Welsh language skills as essential, desirable, needed to be learnt when appointed to the post, or not necessary on the basis of the records kept in accordance with standard 148.

During this reporting period we have advertised 569 vacancies in total, 289 were internal moves with 280 advertised externally. All posts are advertised using the Welsh language ALTE levels from Level 1 to Level 5 whichever is most appropriate for the role following assessment.

All posts advertised at Level 1 are advertised as essential as this is the minimum language level required of all our staff within the organisation to show linguistic courtesy. Training is given to staff who need to attain this level of understanding.

The Recruitment Team ensure that each new or vacant post is assessed for Welsh language level requirement prior to advertising with a confirmation email from the Welsh Language Policy Advisor to the Recruitment Managers.

Our Welsh Language Training Co-ordinator contacts staff who need to develop their language skills as a condition of appointment, liaising with the staff member to find a suitable course and start date. Our Co-ordinator keeps in touch with all learners and provides extra support when required. We have a Yammer page for learners with hints and tips to support their learning, with suggested Welsh programmes to watch or listen to. Courses are also arranged over the summer break to help learners keep up their Welsh language skills. We also have a Mentoring Scheme where our learners can practice speaking Welsh informally with a colleague on a regular basis.

Over the next year we aim to support staff who do not meet the Level 1 minimum language level required to complete the 10-hour online course provided by the National Centre for Learning Welsh to help them in attaining this level.

Number of posts advertised during this reporting period were as follows –

Language Level	Essential	Desirable	Welsh to be learnt
Level 5 – fluency in spoken and written Welsh	5	5	0
Level 4 – fluency in spoken Welsh	47	53	6
Level 3 - The ability to communicate in Welsh with confidence in some work situations	8	79	14
Level 1 – The ability to pronounce basic Welsh names, phrases and greetings	352	0	0

Analysis of the above stats and language abilities of staff who secured roles from internal moves and external recruitment during this reporting period have Welsh language ability as follows: -

- 73 are Welsh speakers at Level 5
- 37 are Welsh speakers at Level 4
- 47 are Welsh speakers at Level 3
- 94 are Welsh speakers at Level 2
- 288 are Welsh speakers at Level 1
- 30 have no Welsh language skills

4. The number of complaints received during the year which related to compliance with standards numbers 152, 156, 162 and 164 with which we are under a duty to comply with.

Two complaints were received from members of the public relating to the standards over the last year, this is down from five complaints received the previous year as follows: -

- In July 2020 a complaint was received from a member of the public who had received a letter from us in English only when at the time their language preference was unknown and should have been sent bilingually. The team who initially sent the correspondence were reminded of our duties, policies and procedures when initiating correspondence with the public.
- In November 2020 a complaint was received that no response was received on the Welsh language “Floodline UK” option at 1.20am. The customer was put on hold for 15 minutes and decided to re-dial and chose the English service where a service was received immediately.

Our Flood Incident team looked into the matter and found that a technical error occurred at the time which resulted in the pre-recorded Welsh message explaining that no Welsh speaker was available and the call was being transferred to an English speaking agent was not played to the customer.

We continue to work with Floodline UK in ensuring that a Welsh language service is available 24 hours a day, 7 days a week.

We continue to receive complaints from staff when all staff emails sent to a large group of staff are sent in English only. When this occurs, the matter is discussed with the team in question and they are reminded of our internal language policy and the support of our translation team and that planning ahead can avoid such circumstances for the future.

Promoting Welsh language and culture

Over the last year, we have celebrated several events virtually, working closely with the Communications Team to promote the Welsh language and heritage both internally and externally.

Eisteddfod Rhithiol / Online Eisteddfod August 2020

- The National Eisteddfod and online events during the event were promoted on our social media all week. We shared activity ideas for all the family encouraging them to be creative and learn more about the environment.

Shwmae/Su'mae day on 15th October 2020:

- Posts on Yammer to encourage and challenge learners to speak Welsh in work/meetings, read Welsh literature or magazines and to listen to Welsh either on television or the radio.

Welsh language rights day on 7th December 2020:

- Post on intranet advising NRW staff on their Welsh language rights.
- Videos recorded by a member of our Executive Team, Leadership Team and a Team Leader were published on social media explaining the importance the Welsh language makes to their working and private lives.

St Dwynwen's day on 25th January 2021:

- Posts on Yammer encouraging learners to speak Welsh in work or at home.
- An article on the intranet explaining the story of Dwynwen's origins/history.

Welsh Music Day / Diwrnod Miwsic Cymru 5th February 2021

- Staff promoted this day on our All Staff Yammer group, sharing their favourite Welsh music, including staff sharing their own musical talents, songs and music they have recorded themselves. These were popular posts which brought Welsh speakers and non-Welsh speakers together through Welsh music, discussing how the music made them feel and the events in their lives the music and songs reminded them of.

St David's day on 1st March 2021:

- Posts on Yammer encouraging learners to speak Welsh and explore Welsh traditions.
- An article on the intranet explaining St David's origins and more information on Welsh language courses supported by NRW.
- Video created by a member of our Communications Team and published on our social media accounts promoting "gwnewch y pethau bychain" (do the small

things) we can all do to help prevent climate change. This is one of the well-known phrases used in Welsh that was used by Wales's patron saint, Dewi Sant (St David) shortly before his death.

Action Plan 2020 – 21

The Action Plan for 2020-21 had 21 actions in total, out of the actions 10 were completed with 10 ongoing, 1 not completed. Some of the ongoing and not been completed actions are due to other work priorities and the Covid-19 restrictions. The ongoing actions will form part of the Action Plan for 2021 – 22.

Action Plan for 2020-21 can be found in **Appendix 5** of this report.

Action Plan 2021 – 22

Action Plan for 2021-22 can be found in **Appendix 6** of this report.

The priority actions will be: -

- Develop an easier process in assessing language levels of vacant posts
- Review our Standards policy to include our monitoring procedures
- Continue our work in developing a Strategy and review our internal language policy

Welsh Language Strategy

Discussions have been held with Welsh Government and The Welsh Language Commissioner on developing a long-term Strategy for the Welsh language for NRW, this is not a requirement of our Standards but something as an organisation we wish to do and shows our commitment to the Welsh language. This will provide us with a vision for the language and a road map of how we are going to develop ourselves into an organisation where the Welsh is spoken, heard and seen, not only in our dealings with others but also in relation to our own staff naturally. Providing staff with opportunities to work bilingually, hold more bilingual meetings, Welsh medium training courses and support staff development for the future.

To date, the work carried out to develop the Strategy is as follows: -

- Held discussions with Welsh Government, Powys County Council, North Wales Police on the development of their Welsh Language Strategies.
- EDI Project 2021 survey for staff and stakeholders includes a question on how we can develop ourselves into a more bilingual organisation
- Work has started with Continuous Improvement Team on options how to assess the language level of each role within the organisation following Welsh Language Commissioner's guidance

Next steps will be holding discussions with staff and Trade Union, asking for their views and thoughts on the development of the Strategy.

The starting point for the Strategy will be mapping the current language skills of our staff, assessing a language level for each role using guidance in place. This will provide us with a true analysis of the language needs for the organisation and plan for how to fill those gaps for the future. This will help in ensuring our Welsh speaking business need matches the capability in each workplace and help us in being an organisation fit for the future in line with the ambition of Welsh Government Language Strategy – Cymraeg 2050.

Our Executive Director of Corporate Strategy and Development, Head of Communications and External Relations and Head of Organisation Development are attending Academi Wales course on developing and transforming organisation cultures to support the day-to-day use of Welsh. This course continues into 2021-22.

Cymraeg 2050

Through our work in implementing and improving our Welsh language services, over the last year we have contributed towards Welsh Government's Cymraeg 2050 Strategy Action Plan for 2020-21 by: -

- Providing opportunities for staff to develop their language skills for work purposes this increase our capability to have more staff able to provide services bilingually for the future.
- Encourage staff to use the Welsh language as part of their work, helping build confidence in using both verbal and written language skills in a more formal manner.
- Ensure that we have Welsh speakers in each of our workplaces to be able to provide a bilingual service,
- Through our Health and Education Team training courses with the education sector, contribute in ensuring that educators have skills to teach environmental subjects through the medium of Welsh using the correct terms and names.
- Through operating bilingual social media accounts, promote Welsh language culture and events to a wide audience, raising awareness that Welsh is a living spoken language.

Risk of Non-compliance

Purchase of Fishing Licences on .Gov website

This is one area which remains non-compliant and was discussed during our annual feedback meeting with the Welsh Language Commissioner. Fishing Licence purchases are administered by the Environment Agency on our behalf, and the service is hosted on the .Gov website. All information on the website is in English only, customers who live in Wales do receive a bilingual fishing licence but are unable to access information or purchase a licence in Welsh on the website or by telephone. Fishing licences continue to be sold at local Post Offices.

The Commissioners staff have held discussions with .Gov to help them in gaining an understanding of the legal requirement in providing bilingual services to the public of Wales. The Commissioner has also been working with us, providing advice and sharing best practice to help us in our efforts to find a solution.

Along with our Digital Communications Team we are holding discussions with the Environment Agency and our aim over the coming year is to translate the pages and ensure a bilingual online and telephone service for customers.

Conclusion

As an organisation we are pleased with the continued progress which is being made in implementing and improving our Welsh language services. With the number of fluent Welsh speakers increasing within the organisation on an annual basis it is important to us that we provide more opportunities for staff to work in the language they feel more comfortable and confident in using.

The Welsh language training courses are popular and as an organisation we will continue to support our staff who are developing their language skills and appreciate the personal commitment made on their journey in becoming Welsh speakers. We will continue to support our staff to ensure that everyone is able meet and greet our customers and partners we work with bilingually to show linguistic courtesy.

This year the number of complaints decreased, whilst as an organisation we continued to provide services to the public through Covid-19. We were pleased to receive positive feedback of how much the effort made in ensuring that meetings and training courses provided bilingually for the public online were appreciated. With forward planning and consideration given from the start it shows it is possible to work bilingually naturally.

Over the next year we will continue to embed Welsh language considerations into our ways of working and look for ways of promoting, facilitating and encouraging more people to use our Welsh language services.

We will continue to work closely with the Environment Agency following the advice of the Welsh Language Commissioner in developing a bilingual Fishing Licence purchasing online and telephone service for our customers.

As an organisation we wish to develop a long-term Strategy for the Welsh language. We look forward to developing this Strategy which will provide us with a vision and a road map of how we are going to develop ourselves into an organisation where the Welsh language is spoken, heard and seen naturally in all our work and dealings with others, including providing more opportunities for our staff to work bilingually internally. This work will help us in our vision of becoming a naturally bilingual organisation.

Appendix 1

Education and Health Team

Health work

- Bilingual blogs to help people with their health and wellbeing during Covid-19 and the importance of using the outdoor environment.
- Create bilingual posters explaining “The Wider Determinant of Health” the natural environment has to offer.

Education work

Tocyn Cymru was used by the team for booking onto “A Natural Childhood – Early Years in the Outdoors Training” online event held in January 2021. Using this system reduced the administration required due to the bilingual ability of the system in confirming appointments with information required for the course listed on a spreadsheet.

Below is a direct link to the event on Tocyn Cymru: -

English page <https://tocyn.cymru/en/event/d5dab23c-5e39-467f-9219-255a48295b2e>

Welsh page <https://tocyn.cymru/cy/event/d5dab23c-5e39-467f-9219-255a48295b2e>

Training was offered in either Welsh or English by the team who received positive feedback that the language used was clear and easy for all to understand.

- Newport's Outdoor Learning group is creating a pack to help groups/schools make the most of the outdoors – NRW has translated them. These will be available on the Outdoor Learning Wales website.
- The University of South Wales has created a learning pack based on “The Lost Words” (poetry book). Early Years students have developed a toolkit for educators with ideas on how to do activities around 'Y Geiriau Diflanedig' “The Lost Words” outdoors. NRW worked in partnership and translated the toolkit which is available on the Outdoor Learning Wales website.
- DRY:Diary of a Water Superhero book explaining the types of drought we are having and what impact they are having on the natural environment in the UK, by University of West England Bristol to encourage discussion on how we can prepare for periods of dry weather and what individuals can do to save water. Natural Resources Wales has paid for a Welsh version of this resource and notes for teachers.
- Between March and September 2020 shared activity ideas to do at home as a family on Outdoor Learning Website, NRW Twitter and Facebook bilingually
- Gave a shout out on Radio Cymru asking for jokes relating to the natural environment and shared them on social media.
- NRW Children’s Charter available in Welsh.
- Staff spoke on Radio Cymru on importance of children having contact with nature and discuss training events staff have been running.

- Training on how Welsh tree names have influenced place names e.g. Betws y Coed, Llwynceilyn, Aberaeron, Pentrefwrdan.
- Education and Learning bilingual Newsletter
- Bilingual videos created showing how to carry out activities – these available on You Tube playlist Welsh.
- Articles about the natural environment in the Cliciadur / Clic It Cymru – a newsletter for younger school children.
- Created a bilingual video to give parents ideas about how to use the natural environment for learning to celebrate the virtual Eisteddfod in August 2020 and shared on our social media.
- Video created in Welsh with English subtitles showing that outdoor learning can take place all year round with accurate clothing with Cylch Meithrin Llandderfel and Sarnau. This is shared on the Mudiad Ysgolion Meithrin internal system for all members to view and are encouraged to become members of Outdoor Learning Wales.

Appendix 2

Stats on Website Welsh pages

Total page views: 44,595 (number of times a visitor has looked at our website pages)

Total unique views: 34,820 (number of times a visitor has looked at a particular page)

Most accessed pages in Welsh

- Homepage – 4,892 views / 4,124 unique views
- Job listing landing page – 1,957 views / 1,430 unique page views
- Check flood warnings – 1,260 views / 885 unique page views
- Flooding landing page – 813 views / 590 unique page views
- Jobs and placements landing page – 777 pageviews / 661 unique pages views

Top referrals on Welsh pages

Homepage

- Direct – 2,649 views / 2,296 unique views
- Google – 1,541 views / 1,238 unique views
- Bing – 138 views / 134 unique views
- Yahoo – 40 views / 36 unique views

Job listing landing page

- Direct – 760 views / 563 unique views
- Google – 666 views / 496 unique page views
- Bing – 241 views / 192 unique views
- Twitter – 80 views / 58 unique views
- Careers Wales – 45 views / 9 unique views

Check flood warnings

- Google – 442 views / 232 unique views
- Direct – 420 views / 308 unique views
- Facebook mobile – 138 views / 121 unique views
- Facebook – 107 views / 94 unique views
- BBC – 76 views / 54 unique views

Flooding

- Direct – 259 views / 188 unique page views
- Google – 237 views / 174 unique page views
- Facebook – 89 views / 58 unique page views
- Twitter – 67 views / 63 unique page views
- Bing – 31 views / 27 unique page views

Jobs and placements landing page

- Google – 331 views / 255 unique page views
- Direct – 219 views / 201 unique page views
- Bing – 179 views / 165 unique page views
- Careers Wales – 9 views / 4 unique views
- Twitter – 9 views / 4 unique page views

Appendix 3

Welsh Language Training

Courses

This year we have 81 learners attending one of the 11 in-house courses that have been set up for NRW staff in Maes Y Ffynnon, Ty Cambria, Maes Newydd and the newest addition, the Buckley office. After liaising with the course providers, courses have been adapted and are now being delivered virtually through Microsoft Teams.

Along with the in-house training, we also have another 81 members of staff learning Welsh within the mainstream. This means that they are either learning with other organisations or are learning within the community. This is a great opportunity for our staff to network and to meet other learners within their regions.

These courses are being delivered virtually using systems such as Microsoft Teams or Zoom. The ICT department have been extremely helpful this year in responding to all of the additional requests for ICT support for these sessions.

Course	Learners 2020/21	Percentage
Entry	90	56%
Foundation	14	9%
Intermediate	28	17%
Advanced	24	15%
Proficiency	5	3%
Total	161	100%

Region*	Learners 2020/21	Percentage
Cardiff	10	6%
Carmarthenshire	10	6%
Ceredigion/Powys	19	12%
Glamorgan	2	1%
Gwent	38	24%
North East	16	10%
North West	38	24%

Pembrokeshire	2	1%
Swansea Bay	23	14%
The Vale	3	2%
Total	161	100%

*Regions are based on the [National Centre for Learning Welsh](#) regions.

As a result of Covid-19, no examinations took place in Summer 2020.

It is hoped that once restrictions ease, some face-to-face training will resume. We will still look to provide our staff with the flexibility of learning online too, as this has proved to be very popular amongst many of our learners. Many learners have already commented that moving courses online has provided flexibility and reduced travelling, being more environmentally friendly. Some learners are looking forward to returning to a classroom environment, even if only arranged occasionally, as they believe it will provide them with further opportunity to reinforce what they are learning.

Mentoring Scheme

In November 2020, we re-launched the mentoring scheme. The scheme is designed to provide support for Welsh learners within NRW. This is even more critical at present as the majority of our learners are unable to practice what they are learning whilst working from home. The scheme involves fluent Welsh speaking staff members or more advanced learners volunteering 30 minutes of their time every fortnight to informally chat to their Welsh learner buddy.

We have had a great uptake so far with 24 mentors and 35 learners registering for the scheme. This is very encouraging, and we are always open/encouraging more people to join.

Say Something in Welsh

There have been many requests in the past from staff to introduce Say Something in Welsh as an alternative and flexible method of learning. As a result, in January 2021 we decided to trial the use of it for 6 months. So far, the trial is going very well with learners enjoying studying 30/40 minutes a week. We currently have 15 people trialling this with more being added daily. They will be asked to provide monthly evaluations in order to view their progress and feedback on the course.

We currently envisage being able to offer this course to staff on short term contracts, visitor centre staff and staff members that are unable to commit to a course due to extenuating circumstances (i.e. medical conditions, etc). As courses tend to become available for September and January starts, it will provide a handy tool for learners to start/continue with their studies whilst waiting to register for a course provided by the National Centre for Learning Welsh.

Events

Over the last year, we have celebrated several events virtually, working closely with the Communications Team to promote the Welsh language and heritage both internally and externally.

Shwmae/Su'mae day on 15th October 2020:

- Posts on Yammer to encourage and challenge learners to speak Welsh in work/meetings, read Welsh literature or magazines and to listen to Welsh either on television or the radio.

Welsh language rights day on 7th December 2020:

- Post on intranet advising NRW staff on their Welsh language rights.
- Video published on NRW social media of some NRW learners explaining the importance of learning to them.

St Dwynwen's day on 25th January 2021:

- Posts on Yammer encouraging learners to speak Welsh in work or at home.
- An article on the intranet explaining the story of Dwynwen's origins/history.

St David's day on 1st March 2021:

- Posts on Yammer encouraging learners to speak Welsh and explore Welsh traditions.
- An article on the intranet explaining St David's origins and more information on Welsh language courses supported by NRW.

Welsh Language Skills of Staff February 2021

No return completed	No language skills	Able to pronounce basic phrases and greetings	Able to construct basic sentences	Able to discuss some work matters confidently	Fluent Welsh speaker	Fluent in both spoken and written Welsh
109	87	915	438	153	225	310
(4.9%)	(3.9%)	(40.9%)	(19.6%)	(6.8%)	(10%)	(13.9%)

Welsh Language Skills of Staff at 11 March 2020

No return completed	No Welsh language skills	Able to pronounce basic Welsh phrases Level 1	Able to construct basic Welsh sentences Level 2	Able to discuss some work matters confidently Level 3	Fluent Welsh speaker Level 4	Fluent in both spoken and written Welsh Level 5
134	63	820	412	136	211	275
6.5%	3.1%	40.0%	20.1%	6.6%	10.3%	13.4%

Headcount February 2021 = 2237

Number and percentage of Welsh speakers at January 2021 = 535 (24%)

Headcount March 2020 = 2051

Number and percentage of Welsh speakers at March 2020 = 486 (23.7%)

Welsh Language Skills of Staff per Directorate at February 2021

	CCC	CSD	EPP	FCS	OPS	TOTAL
No return completed	7	8	18	6	70	109
No language skills	6	2	20	9	50	87
Able to pronounce basic phrases and greetings	23	30	266	72	524	915
Able to construct basic sentences	18	22	136	38	224	438
Able to discuss some work matters confidently	6	4	46	12	85	153
Fluent Welsh speaker	11	11	43	19	141	225
Fluent in both spoken and written Welsh	35	17	51	18	189	310

Each of our Directorates have Welsh speakers who are fluent in both spoken and written Welsh.

Welsh Language Action Plan 2020 - 2021

Objective	Key Action	Liase/work with	Owner	Status
Review Grŵp Pencampwyr terms of reference and membership to oversee and promote Welsh Language Standards	<ul style="list-style-type: none"> Review terms of reference of group Promote purpose of group through, publications on intranet, Yammer, Managers Monthly, team meetings and current group members Ensure member for each Directorate/area of business as part of group 	Grwp Pencampwyr	People Management	Completed
Draft Bilingual Skills Strategy	<ul style="list-style-type: none"> Identify the language needs of the Organisation Identify the language skills of the workforce Plan how we maintain and increase skills to meet identified need 	People Management Grwp Pencampwyr Learning and Development Organisation Development	People Management	Ongoing Due for completion on Q4 2021/22
Service Delivery Standards				
Continue discussions with WG and Environment Agency on purchase of fishing licences	<ul style="list-style-type: none"> Following agreement on a way forward, ensure that systems and services are developed to provide a Welsh language service in the purchase of fishing licences 	EPP Specialist Advisor, People Management	EPP	Ongoing Discussions taking place Q1 and Q2

Objective	Key Action	Liaise/work with	Owner	Status
Review and update Translation guidance in line with accessibility requirements	<ul style="list-style-type: none"> • Look at Welsh language standards and accessibility and equality legislation requirements • Draft amendments and liaise with Welsh Commissioner for approval • Promote new guidance and publish on intranet, Managers Monthly and team meetings 	Digital Communications Team Translation Team WL Commissioner	People Management Digital Communications	Completed
More use of Welsh on our social media accounts	<ul style="list-style-type: none"> • Promote more use of Welsh on our social media accounts • Encourage our Welsh speakers and learners who use social media to use their language skills 	Digital Communications Team	Communications Team	Ongoing Due for completion Q3
Promotion of Welsh culture days/events	<ul style="list-style-type: none"> • Look for opportunities to promote Welsh culture events on our intranet, Yammer and social media accounts 	Communications Welsh Language Training Co-ordinator Specialist Advisor, People Management	Communications Learning and Development People Management	Completed
Policy Making Standards				
Review Welsh language considerations on Equality Impact Assessment	<ul style="list-style-type: none"> • Review impact assessment to ensure compliance with standards to help ensure so we engage with communities in a more equitable way Develop guidance, Training and promote use of Equality Impact Assessment as good practice across organisation 	People Management EDI Forum Grwp Pencampwyr Trade Union	People Management	Completed

Objective	Key Action	Liase/work with	Owner	Status
Operational Standards				
Work to ensure MyNRW becomes fully compliant with Standard 100	<ul style="list-style-type: none"> Explore ways to make absence fields within MyNRW bilingual. 	MyNRW Systems Team	MyNRW Systems Team	Completed
Learning and Development-Land Management training courses	<ul style="list-style-type: none"> Proactive in offering Welsh medium land management courses when advertising to staff 	Learning and Development	Learning and Development	Ongoing Due for completion
Review and update Welsh language training programme and re-launch	<ul style="list-style-type: none"> Research into range of courses available online, skype, self-led, classroom learning, residential courses in discussion with National Centre for Learning Welsh Amend Welsh Language Training programme 	WL Training Co-ordinator Specialist Advisor, People Management National Centre for Learning Welsh Grwp Pencampwyr Welsh Language Training Co-ordinator	People Management	Q2 2021/22 Completed Completed
Re-launch Mentoring Scheme	<ul style="list-style-type: none"> Launch training programme and promote on intranet, Yammer, Manager's Monthly and team meetings 			Completed
Dwi'n Dysgu Cymraeg option for learners in outlook	<ul style="list-style-type: none"> Request fluent Welsh speakers to become Mentors to learners Promote Mentoring Scheme to learners and on intranet, Yammer, Managers Monthly and team meetings Offer learners option of Dwi'n Dysgu Cymraeg (Welsh learner) in outlook 	Welsh Language Training Advisor Grwp Pencampwyr Specialist Advisor, People Management	ICT	Ongoing due to be completed Q2 2021/22

Objective	Key Action	Liaise/work with	Owner	Status
<p>Arrange training courses: - Welsh language awareness</p> <p>Benefits of Bilingual Workforce Holding bilingual meetings</p>	<ul style="list-style-type: none"> • Ensure option becomes operational for those who have taken up this option • Raise awareness and gather interest in attendance for courses • Discuss and arrange course requirements with training providers • Promote courses on intranet, Yammer and through normal training procedures 	<p>Welsh Language Training Co-ordinator</p> <p>Welsh Language Training Co-ordinator Learning and Development</p>	<p>Learning and Development</p>	<p>Ongoing due for completion Q4 2021/22</p>
<p>Welcome email to all new Starters</p> <p>Ensure all staff self-assess Welsh language skills and record in MyNRW</p>	<ul style="list-style-type: none"> • Promoting Welsh language policy, guidance and training programme in place • Gather statistics and contact staff and Managers to update their records 	<p>Welsh Language Training Co-ordinator</p> <p>Welsh Language Training Co-ordinator</p>	<p>People Management Learning and Development</p>	<p>Completed</p> <p>Ongoing Due for completion at end of each Quarter</p>
<p>Review and promote internal language policy</p>	<ul style="list-style-type: none"> • Set up working group from across business including Trade Union to review internal policy • Look at other organisations for best practice • Discuss with Welsh Language Commissioner • Promote and launch reviewed policy 	<p>Grŵp Pencampwyr Representatives across business Trace Union Welsh Language Commissioner Specialist Advisor, People Management</p>	<p>People Management</p>	<p>Ongoing Due for completion Q4 2021/22</p>

Objective	Key Action	Liase/work with	Owner	Status
Record Keeping Standards				
Self-regulate our compliance with Welsh language standards	<ul style="list-style-type: none"> Carry out survey on our Welsh language services on website, through our Customer Care Centre and Visitor Centres 	Specialist Advisor, People Management Customer Care Centre Recreation Team	People Management	Ongoing Due for completion Q4 2021/22
Draft Welsh Language Annual Report	<ul style="list-style-type: none"> Liase with business to gather information on the work in implementing and improving our Welsh language services Gather statistics on our compliance as required by Record Keeping Standards 	Specialist Advisor, People Management Welsh Language Training Co-ordinator	People Management	Completed

Welsh Language Action Plan 2021 – 22

Objective	Key Action	Liaise/work with	Owner	Status
Draft Bilingual Skills Strategy and review internal language policy	<ul style="list-style-type: none"> • Identify the language needs of the Organisation • Identify the language skills of the workforce • Plan how we maintain and increase skills to meet identified need • Review internal policy based on discussions with staff and best practice • Work with Continuous Development Programme to develop a new streamlined process for assessing language levels of posts 	People Management Grwp Pencampwyr Learning and Development Organisation Development	People Management	Due for completion Q4
Service Standards				
Continue discussions with WG and Environment Agency on purchase of fishing licences	<ul style="list-style-type: none"> • Following agreement on a way forward, ensure that systems and services are developed to provide a Welsh language service in the purchase of fishing licences 	EPP Specialist Advisor, People Management	EPP	Due for completion Q3/4
Review Welsh language requirements on social media platforms	<ul style="list-style-type: none"> • Promote use of Welsh on our social media accounts • Social media accounts managed centrally • Social media training session including Welsh language requirements 	Communications Team	Communications Team People Management	Due for completion Q3

Objective	Key Action	Liaise/work with	Owner	Status
Promotion of Welsh language, culture days/events	<ul style="list-style-type: none"> Look for more opportunities to promote Welsh language, culture events/days on our intranet, Yammer and social media accounts 	Welsh Language Training Co-ordinator Specialist Advisor, People Management Communications Team	Communications Learning and Development People Management	Due for completion Q4
Flood Awareness	<ul style="list-style-type: none"> Floodline We are planning to improve this service by developing a Welsh language call agent service – available regardless of time or day Flood Warning Message & Website explore options for developing this translation capability so that we can provide richer, more helpful information is to provide real-time information to help people understand their immediate flood risk Warning service carry out activities to promote our Welsh language offering in the hope of increasing their use. 	Flood Awareness Team	Flood Awareness Team	Due for completion Q4
Increase callers choosing Welsh language option for Customer Care Centre	<ul style="list-style-type: none"> Carry out survey Carry out survey on our Welsh language services on website, through our Customer Care Centre and Visitor Centres 	Customer Care Centre	Customer Care Centre	Due for completion Q4

Objective	Key Action	Liase/work with	Owner	Status
			People Management	
Review Welsh Language Signage Guidance	<ul style="list-style-type: none"> Ensure standard forms of place-names and topographical features are explained and used on signage and interpretation panels. 	Recreation Sites Planning Team	Recreation Sites Planning Team	Due for completion end of Q3
Policy Making Standards				
Equality Impact Assessment review tracker	<ul style="list-style-type: none"> Ensure all Equality Impact Assessments are recorded 	Organisation Wide	People Management	Due for completion end of each Quarter
Monitor inclusion of Welsh language in our consultation processes	<ul style="list-style-type: none"> Raise awareness of requirement Monitor inclusion in our consultation processes 	Organisation Wide	People Management	Due for completion end of each Quarter
Operational Standards				
Raise awareness of Welsh Language Training Programme	<ul style="list-style-type: none"> Promote Welsh Language Training Programme via, intranet and Yammer Publish articles to promote use of Welsh and Welsh culture days Provide support to learners Promote Mentoring Scheme Arrange informal group chats for learners Arrange Welsh Language Awareness Training 	<p>Welsh Language Training Co-ordinator</p> <p>Organisation Development</p>	People Management	Ongoing each Quarter

Objective	Key Action	Liaise/work with	Owner	Status
				Ongoing each Quarter
Dwi'n Dysgu Cymraeg option for learners in outlook	<ul style="list-style-type: none"> Promote the use of Mail Tip with learners and implement in outlook as requested by staff 	Welsh Language Training Co-ordinator ICT	People Management ICT	Due for completion Q2
Arrange Welsh medium training courses	<ul style="list-style-type: none"> Benefits of Bilingual Workforce Holding Bilingual Meetings 	Learning and Development	People Management	Due for completion Q4
E-mail to all new Starters Ensure all staff self-assess Welsh language skills and record in MyNRW	<ul style="list-style-type: none"> Welcome e-mail raising awareness of Standards, guidance and Welsh Language Training Programme Include need to assess language skills and provide guidance in e-mail above. Monitor People Finder and send out reminders 	Welsh Language Training Co-ordinator Specialist Advisor People Management	People Management	Ongoing at end of each Quarter Ongoing at end of each Quarter
Record Keeping Standards				
Update Welsh Language Standards Policy	<ul style="list-style-type: none"> Include section on our monitoring of our Standards 	Specialist Advisor People Management	People Management	Due to be completed Q4

Objective	Key Action	Liaise/work with	Owner	Status
Draft Welsh Language Annual Report	<ul style="list-style-type: none"> • Liaise with business to gather information on the work in implementing and improving our Welsh language services • Gather statistics on our compliance as required by Record Keeping Standards 	Specialist Advisor, People Management Welsh Language Training Co-ordinator	People Management	Due to be completed Q4

Board Paper

	Paper Details
Paper title:	Storm Overflow Discharges – Ambition and Priority Actions
Paper Reference:	21-07-B15
Paper sponsored by:	Ceri Davies Executive Director of Evidence, Policy and Permitting, Gareth O’Shea, Executive Director of Operations
Paper Presented by:	Sian Williams, Head of North West Wales Operations, Mark Squire, Sustainable Water Manager, Nadia De Longhi, Head of Regulation and Permitting
Purpose of the paper	Scrutiny
Recommendation	We recommend the Board considers the seven focus areas as priority actions for us in the context of our overall ambition to achieve good ecological status for rivers in Wales.

Issue

- Over recent years (and as highlighted in the April 2021 Panorama programme) there is increasing concern about storm overflow discharges:
 - whether they should exist at all
 - whether we, as the environmental regulator, have sufficient regulatory oversight
 - whether they are operating as they were designed
 - whether they are spilling too frequently (and in dry weather)
 - whether they are having an impact on the environment
 - whether they are having an impact on public health for water users.
- Whilst work was already ongoing through Water Industry technical groups focusing on storm overflow usage, the Board has asked us to consider our position and how NRW as the environmental regulator should respond to the concerns raised in the Panorama programme and those of the wider public.

3. Regulation of storm overflows is part of our wider river catchment work and is risk based on potential environmental impact. It is appropriate considering public concern that we examine our evidence and regulatory activity, whilst also taking a strategic catchment approach, to assess if storm overflow spills could compromise us meeting our environmental outcomes. At the Board session in November 2020 on water quality the feedback was to identify the strategic environmental outcomes we want to achieve, aim to better link people to water at a local scale and to ensure partners are drawn into the solutions required to improve our river water quality.
4. We have opportunities through this work and our work on Water Framework Directive (WFD), Special Areas of Conservation (SAC) rivers, Natura 2000 (N2K), LIFE, Bathing and Shellfish Waters to achieve our objectives. There is a lot of attention on water companies, regulators and governments to improve the water environment, so what are the opportunities for us? As there are several sources which impact upon water quality, we need to prioritise our work based on evidence to target our resources at tackling these issues that cause the greatest concern.

Background

What is a storm overflow?

5. Storm overflows are prevalent across the sewer network in the UK. We have combined systems, where surface water (from drainage, and in some cases small watercourses / rivers) is taken into the sewer network to reduce the risk of flooding by moving surface water away from homes and people and discharging it, after treatment, into our rivers. This also means that when it rains heavily, sewers can become overloaded, storm overflows act as a “pressure valve” allowing the storm water to be discharged from the network to prevent property flooding or the sewage treatment works being overwhelmed. By discharging when the river is in flood (during heavy rainfall), the dilution available is at its maximum, with the intention that this should minimise the polluting impact of any untreated sewage discharging to the river along with the rainwater.

Legislation

6. The Urban Wastewater Treatment (England and Wales) Regulations (1994) are the tool for implementing the UWWT Directive. The principle related to storm overflows in this legislation is that water companies have a duty to provide adequate “collecting systems”.
7. Where discharges are into designated areas such as Bathing Waters or Shellfish Waters, they must also comply with the requirements of the relevant legislation, and spills must not have an impact on the designated area.
8. It is also important to note that in Wales, we have the Environment (Wales) Act 2016 and the Wellbeing of Future Generations (Wales) Act (2015), both of which have additional requirements to the legislation in England. This is important to bear in mind when considering our position as a regulator in Wales.

Our work on storm overflows

9. NRW is part of the National Task and Finish group which is attended by the UK Water Companies and the Environment Agency. This has an overview of the implementation of the Event Duration Monitoring (EDM) across the sewer networks and the Storm Overflow Assessment Framework (SOAF). The SOAF sets thresholds for storm overflow spill frequency and a framework for investigation where the thresholds are breached, and a methodology to determine if the frequency of spills can be reduced in a cost beneficial manner.
10. Dŵr Cymru currently have 605 SOAF investigations based on assets that spill greater than 60 times a year in the National Environment Programme (NEP) of the water company investment programme. Hafren Dyfrdwy do not currently have any investigations underway based on spill data returns (they have 50 storm overflows within Wales). Further consideration is given to assets which spill within failing water bodies as part of the WFD investigations. As future EDM data returns are analysed, these numbers are expected to rise.
11. Further details of the current work under this framework will be covered in the presentation to the Board.

Storm Overflow Summit

12. Our Chair will shortly meet with the Chairs of Ofwat and the Water Companies to set the level of ambition for tackling spills from storm overflows and undertaking assessment of the environmental and public health impacts arising.
13. A storm overflows summit was held on 18th June 2021, present at the summit were representatives from Welsh Government, Ofwat, Environment Agency, NRW, Dŵr Cymru and Hafren Dyfrdwy. This paper provides our assessment of priorities following the summit.

Assessment

NRWs current position

14. It is important we take an evidence-based approach to tackling this issue. It is crucial that we have sufficient evidence to understand both the impact of spills on the environment and can assess the performance of the sewerage network against the requirements of the legislation. This will determine the approach to take on individual assets.
15. We appreciate the public concerns around this issue and the additional requirements of the legislation in Wales for the sustainable management of natural

resources in formulating our approach and priorities for responding based on evidence and impact.

Current funding arrangements

16. Water Companies fund investigations and improvements to assets that have environmental impacts via the five-year water company investment programme and the National Environment Programme (NEP) within their business plans. For their 2020-25 and 2025-30 Water Company Investment Periods, the investment committed for tackling intermittent storm overflows is £35million for Dŵr Cymru (see below for numbers of investigations this funds). Currently we have no planned investigations for Hafren Dyfrdwy but this will be assessed as more EDM data becomes available, we will be reviewing this as part of the planning cycle underway now for 2025-30 business plans for both companies.
17. NRW funding for our work on water quality improvement is funded from non-flood Grant in Aid from Welsh Government and from permit and subsistence regulatory charges. Our subsistence charge income of circa £6.4million is the resource used for assessing compliance of regulated activities. We have a small number of posts in our place-based Environment Teams who lead on water quality – note though that in addition to regulation of water companies, they also regulate and provide advice regarding the private sector, process industry and agriculture and lead on our response to pollution incidents.

Current evidence base:

Permits to discharge

18. We regulate over 2500 storm overflows via environmental permits, the majority are Dŵr Cymru's as the biggest water company in Wales, Hafren Dyfrdwy have 50 storm overflows. Working with both water companies in Wales we have identified that there are almost 200 unpermitted storm overflows across Wales, our immediate priority is ensuring that these are brought into regulation and gain environmental permits. We are also reviewing the information from the installation of EDM across the sewer network and reviewing those assets that are spilling too frequently both in terms of the permits in place and the impact on the receiving environment.

Spill Data

19. The water companies have been installing EDM on storm discharges as part of their water company investment programmes. Some 2300 overflows will have monitors in place including most of the currently unpermitted assets. The data from these monitors is being used by the water companies to initiate investigations based on those assets that spill more than 60 times a year. The data is also helping to track spills from all assets year on year and will identify and allow targeting of investment to tackle deteriorating assets. Based on spill numbers there are likely to be over 800 investigations required by Dŵr Cymru, we have 605 accounted for in the AMP7 and

AMP8 programmes already. In many cases this will lead to improvement schemes that reduce the number of spills from storm overflows.

Rainfall Data

20. We have a network of rainfall gauges across Wales – either owned and operated by NRW, or by others (including the water companies). This data can be used to determine whether discharges reported through EDM are occurring as designed during or following wet weather.
21. Considering the changes to weather patterns because of climate change impacts, we need to clearly define “storm” or “wet weather” so that our permits remain enforceable, and we can take action when spills are taking place when they should not be. We also need to be able to account for any local circumstances that may mean spills occur sometime after a storm event. It is generally accepted that storm discharges should only occur during a storm event, but because of sewer design this may vary from location to location, this needs to be considered in our regulatory assessment.
22. We recognise that since privatisation of the water companies much of the focus has been on the permitting, regulation and improvement of the operation and discharges from Sewage Treatment Works. The Urban Wastewater Treatment Directive infraction case which concluded in 2016 highlighted the need to focus on the “collecting system” and its assets. Our work in Wales started in 2012 with a programme of investment for the installation of EDM, the outcome in 2016 of the infraction case focused our attention on bringing in the regulation and permitting related to storm overflows.

Environmental Impact

23. We have a network of water quality monitoring sites around Wales, and significant amounts of historic data. Most of our chemical data is “spot” data, so taken as one sample at a moment in time, rather than continuously.
24. We also have current and historic ecological and fisheries monitoring data. Although the number of locations is fewer, and surveys are taken less frequently than spot samples, our ecological surveys are much more detailed, and the ecology of a particular river location doesn't change significantly over short periods of time, unlike the chemical quality of the water. Our investigations programme under WFD (see para 25 below) provides a snapshot in time of ecological quality and river classification is based on this.
25. If specific discharges are of concern to our officers, we will undertake surveys assessing its environmental impact. However, as this is a risk-based approach this

will not extend to surveys at all discharge points. We don't monitor for other factors such as public health indicators (as for bathing waters), microplastics or other materials that may also be present e.g. pharmaceuticals.

26. Our monitoring capability currently focuses on environmental condition reporting such as that required for WFD reporting. The implications of our focus on storm overflow regulation and any future inland bathing water designation or other increased recreational use of inland water bodies means that we will need to secure additional resources to build our capacity for additional monitoring and surveillance and any potential follow up enforcement. This would allow us to gather evidence to enable us to better assess environmental impacts from individual assets and seek improvements through our regulation.

Town and Country Planning

27. Sewer networks are designed to serve a specific population size. When developments increase the population, the water company should make adaptations to the sewer network to ensure no adverse impact on the receiving waters i.e. no increase in spill frequency or volume of discharge.
28. Over time, we have seen an increase in hard surfaces in towns and cities through expansion of public car parking areas and town centre developments, people paving over their gardens for private parking and / or easier maintenance. These actions all contribute to surface water run-off into the combined sewer system and ultimately to an increase in storm overflow spills.
29. The Drainage and Wastewater Management Planning (DWMP's) process which water companies will produce in 2022 is a step forwards for a catchment management approach. This is a new area of work for NRW and at present we have no additional funding and have limited capability from the current resources which we are feeding into the DWMP process in Wales. There is a high likelihood that these plans will become statutory post 2022 and put a greater emphasis on drainage planning. It would be useful for NRW to provide advice to Welsh Government and water companies in this long-term planning process.

Welsh Government's Position

30. Welsh Government are keen to see the action for improving storm overflows combined with catchment approaches to dealing with other key environmental concerns such as SAC river quality improvements and achievement of good ecological status under WFD. They recognise the need for action and support the approach taken by Water Companies and NRW in Wales to date, but they, like us, want to see tackling storm overflows as part of a holistic roadmap to better water quality in Wales, which includes all other delivery partners playing their part and with clear priorities of where action is needed.

Welsh Public Opinion

31. People know more, and care more about the environment than they ever have before. Use of inland waters for recreation has increased exponentially, and we are delighted to see so many people enjoying nature and the outdoors in this way.
32. With greater use and understanding of the environment comes more scrutiny. We need to be able to explain our position, and to respond to public concerns, show leadership and the ability to regulate when and where required. Along with partners we need to explain why “no spills” might not be technically or economically feasible in the medium term. Dŵr Cymru estimate that to achieve less than 10 spills on all storm overflows on their assets could cost £14 billion compared to a current spend of circa £2 billion in total every 5-year investment plan.
33. The water companies continue to undertake public campaigns to help the public understand the impact individual behaviours have on the sewer network and ultimately the environment. Inappropriate disposal of materials to sewer such as nappies, wipes and fat cause sewer blockages which in turn cause storm overflows to operate outside of storm conditions.

OFWAT's position

34. Ofwat have written to all water and sewerage companies highlighting expectations that water company boards will be actively considering whether they have a full and accurate picture of storm overflow assets and performance, the environmental impact of their use and a clear and timely strategy for addressing any shortcomings in that performance. Furthermore, to consider whether companies have the right data and insights, and processes and controls in place to monitor and drive improvements and ensure compliance with legal obligations with respect to storm overflows. Ofwat state that this is necessary to enable boards to be confident in the assurance it provides via the company's annual certificates.

Summary

35. This is a complex issue with numerous different factors to consider and must be seen in the context of improving river water quality in its widest sense. However, it is important that we all agree to the ambition before we can move ahead to delivery. The Board and Executive need to be comfortable with our position, resource implications and consequences for other work so we can move on to delivery.
36. There is a wide spectrum of options within the ambition to improve our river water quality depending on whether the intent is to eliminate storm overflow spills over a 20 to 30-year period or to eliminate the harm or potential to cause harm to the environment from storm overflows. Alongside the ambition, there are a range of

activities that can contribute to addressing the impact and number of spills from storm overflows such as pre-treatment, use of reed beds and surface water removal. Both the ambition and activities come with considerable cost, resource and funding requirements and tackling storm overflows as a priority over other areas of work has consequences.

37. Resource requirements for NRW will be discussed with the Board on the 14th July during the presentation.

Recommendations

38. We recommend the Board considers the seven focus areas below as priority actions for us in the context of our overall ambition to achieve good ecological status for rivers in Wales. We would work with Ofwat, water companies, Welsh Government and local authorities to minimise the environmental impact of storm overflows by reducing the frequency of their operation and their impact. To consider maximum spill limits for SAC rivers akin to those for bathing and shellfish waters, to consider further spill limits ahead of any future potential designation of waterbodies e.g. inland bathing waters. To work with water companies to understand the environmental impacts of storm overflow operations now that we have EDM information. To ensure this work is a priority for the upcoming water company investment programme.

39. To address these priority areas at a faster pace additional resources will be needed to develop guidance for staff, develop permit conditions, issue permits, undertake additional compliance and enforcement work, consider enforcement responses for any permits that cannot be issued. Additional modelling capability will be required to assess the permit applications and the environmental impact and provide assurance of the sewer models used by water companies. We will need to undertake additional investment planning work, environmental monitoring and surveillance and assess evidence gaps and develop plans to fill them.

Areas of Focus:

Tackling Unpermitted Discharges

40. Only when storm overflows are permitted can we take enforcement action for non-compliance with permit conditions and any action is linked to environmental impact. The priority for us is to press the water companies as a matter of urgency to ensure they apply for all remaining unconsented discharges in Wales. We anticipate that some storm overflows will not be capable of meeting the required standards.

Increased Storm Overflow Permit Compliance

41. Storm overflows are designed to meet a specific spill frequency. For coastal bathing waters, this is based on 3 spills per bathing season, for shellfish waters it is 10 spills per year, but for inland waters there is no such defined spill frequency. Acceptability (and therefore the decision to permit) inland discharges is based on modelling the network, predicting spill frequency and using modelling to assess the impact of the discharge on the receiving water. We undertake audits to assess compliance against the design standard at a small number of sites each year on a risk basis.
42. To assess compliance fully we need to widen this work to compare design to actual spills (including frequency, duration and volume) across geographic areas on a prioritised basis. Prioritisation should be in line with environmentally sensitive areas and areas of concern - SAC rivers, WFD failing stretches and priority catchments, bathing waters and shellfish waters with poor compliance, areas where we get significant numbers of complaints and then others.
43. Any improvements needed should be directed through the water company investment planning process, with potential for bringing forward investment for the most impactful storm overflows through the Interim Determination Process considered by Welsh Government and Ofwat.

Greater Environmental Impact Assessment

44. We need to know the impact storm overflows are having on rivers in Wales. We know that we have compliance issues with SAC rivers, we have priority catchments for WFD improvements, and we know that some of these storm overflows are operating more than they should be. However, without more detailed surveys it is difficult to know what contribution these intermittent discharges are having on the overall water quality of Wales's watercourses.
45. In addition to the work already undertaken for SAC rivers and for WFD, further detailed assessment of the evidence we now have from EDM compared against environmental monitoring and pollution incident reports needs to be undertaken.

Increased Public Health Impact Assessment

46. We currently only have one designated inland bathing water in Wales (Llyn Padarn in Gwynedd). Unless a waterbody is designated as a bathing water there is no requirement for monitoring public health indicators (e.g. bacteria count) or to provide data on bathing water quality. Designation takes place through Local Authorities making an application to Welsh Government. Watercourses may not be suitable for bathing for other reasons beyond storm overflow discharges.

47. There is an opportunity to learn from approaches elsewhere, as there are numerous designated inland bathing waters in other European countries. Collecting public health data is a significant task. We will continue to build on work already underway to assess the potential for designation of additional inland bathing waters in Wales, and to determine what that means for storm overflows and water company sewage treatment works discharge permits. This will involve working closely with Welsh Government, Local Authorities and water companies.

Planning

48. In SAC catchments we need to understand the contribution storm overflows make as we drive down phosphate levels through restrictions on other activities.

49. Assessment is needed of situations where water companies have expanded their networks over the years to allow for additional developments within the catchments where these developments are putting pressure on the network and causing them to spill too frequently. This work should also drive our input to the forthcoming guidance and advice on Drainage and Wastewater Management Plans.

Communications

50. We need to be clear on our message – the background, our ambition and the outcomes expected, how we want to achieve them and over what timescale. We will need effective and sustained communications as this work will be delivered over several water company investment planning cycles.

An integrated approach

51. There are many different aspects to tackle to meet our goal of better river water quality in Wales including our work on the SAC rivers water quality, tackling agricultural pollution, priority WFD waterbodies improvement, flood risk management and water company consent compliance. We need to ensure all these separate strands of work are integrated and support meeting the overall aim as quickly as possible. Whilst we need to take an integrated approach internally, we will need to facilitate action amongst our many partners externally whose responsibilities also have an impact.

Key Risks

52. Reputation – As the environmental regulator, there are areas NRW can and should concentrate efforts on, such as permitting of the unpermitted assets and making better use of the EDM data supplied as part of permit conditions to ensure the environment is protected. The public would expect this.

53. Priority – Through our evidence, NRW needs to determine the priority of work to minimise storm overflow spills has within our overall ambition of achieving better

river water quality and drive that focus through our regulatory work and the NEP within the water company investment planning cycles. We will need to work with others including Ofwat, Welsh Government, Local Authorities and other sectors to ensure that all contributions that impact on water quality are tackled proportionately.

54. Pace – the costs to tackle storm overflow spills is great and will need to be planned over several water company planning cycles we need the flexibility to accelerate investment where the environmental impact shows we will be unable to achieve our outcomes. We need to consider the pace on our ability to deliver our wider ambition of better river water quality in Wales.

55. Legal challenges to our approach.

Next Steps

56. Agree the priority and level of ambition to allow development of a programme of work and a roadmap to achieving better river water quality in Wales. Identify the resource required for the activities to enable NRW to deliver on the agreed ambition.

Financial Implications

57. Cost - Our level of ambition and direction to the water companies could impact bills and priorities for the customers of the water companies in Wales. For example, removing storm overflows completely is estimated by Dŵr Cymru to cost circa £9-14 billion. We must be sure of our priorities and evidence base when driving future investment.

58. Delivery of this programme will require significant additional resources across the organisation. Based on the ambition discussed, we will work up options for brigading existing resources and additional requirements and the impacts on existing work areas.

Equality Impact Assessment (EqIA)

59. The impact of additional work on overflows will impact the water bill payer. In Wales the level of debt and those on social tariffs is higher than for any other water company. Additional environmental costs incurred would impact across all social groups.

Index of Annexes

60. None

Board Paper

	Paper Details
Paper title:	Risk Management Strategy – annual review
Paper Reference:	21-07-B16
Paper sponsored by:	Prys Davies, Director Corporate Strategy and Development
Paper Presented by:	Anjali Wainwright, Lead Specialist Advisor, Risk
Purpose of the paper	Decision
Recommendation	Agree amendments to Risk Management Strategy

Issue

The annual review of the risk management framework has been undertaken in the light of live running and recommendations from the internal audit reviews. Some very small changes have been made to the Policy which ET approved in May. The Board is asked to approve the changes to the Strategy (annex 1)

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Annex 1 – Risk Management Strategy

RISK MANAGEMENT STRATEGY

Introduction

NRW must effectively manage risks in order to ensure that the natural resources of Wales are sustainably maintained, enhanced and used, now and in the future.

Risk management encompasses a set of activities that allows the identification, assessment, mitigation and monitoring of risks that could have a material impact on the achievement of NRW's objectives. Effective risk management allows NRW to obtain the benefits of taking calculated risks and seeking opportunities, whilst helping to avoid exposure to undesirable surprises. NRW does not aim to eliminate all risks but manages the risks it faces to support successful achievement of its objectives.

Risk management is not simply a process, it is a useful business tool to support NRW and should be a key element of all decision-making.

NRW's strategy and policy sets out a common approach and minimum risk management requirements to enable the consistent application of risk management across NRW. The strategy is approved by the Board and the policy by the Executive Team, but the two come together in this document. All staff and Board members need to understand and adopt it.

NRW is improving its approach to risk management and these requirements will be reviewed as the organisation matures in the way it manages risk.

Strategic Approach

Effective risk management enables NRW to manage its risks successfully. It assists in achieving our objectives and enables us to effectively respond to challenges faced. Risk management must be an integral part of planning and decision making, and it is important to take a balanced view to managing opportunity and risk.

Key principles

NRW fundamentally promotes an **integrated approach** to managing risks across the organisation. Across the organisation, NRW:

- Sets **clearly defined and documented accountabilities** for risk management.

- Follows a **common risk methodology and risk terminology** for identifying and managing risk.
- Embeds **risk management in all key processes and decision points** (e.g. key meetings, strategy setting, business planning and budgeting) as well as day-to-day operations.
- Ensures **reporting and escalation of risk information** is timely and accurate and covers all significant risks to support decision-making at the appropriate levels within NRW.
- Ensures **appropriate assurance arrangements are in place** to monitor the effectiveness of the risk management framework on a routine basis.

Roles and Responsibilities

The below roles and responsibilities are summarised in diagrammatic form in Appendix D.

NRW Board should:

- Approve NRW's Risk Management Strategy and review it annually.
- Set and communicate the Board's risk appetite, including annual review to ensure it remains appropriate.
- Review the Strategic Risk Register, at least annually.
- Receive reports from the Audit and Risk Assurance Committee on the effectiveness of the risk management framework. This may include reporting on the overall risk management framework, deep dives into a strategic risk, or significant updates from the monitoring of risks.

Audit and Risk Assurance Committee (ARAC) should:

- Advise the Board and support the Chief Executive/Accounting Officer on matters of risk.
- Gain assurance on the effectiveness of the risk management framework.
- Monitor the risk management process and, at least annually, carry out a review of its effectiveness.
- Review and challenge actions taken by management to manage significant risks (including the strategic risks).
- Receive annually and review feedback from other Board committees on the deep dives of strategic risks that they have undertaken in order to provide the Board with advice to enable it to assure itself of the effectiveness of the risk management framework. ARAC to be assured that the committee were confident that the identified actions would move the risk from the current level to the target level in a timescale acceptable to the committee in question

The Accounting Officer should:

- Ensure a system of risk management is maintained to inform decisions on financial and operational planning and to assist in achieving objectives and targets.
- Ensure that risks (whether to the achievement of business objectives, regularity and propriety or value for money) are identified, that their significance is assessed, and that appropriate systems are in place to manage them.
- Ensure the management of opportunities and risk achieves the right balance commensurate with the business of the organisation and the risk appetite it is prepared to bear.

Contact

The Risk Management Policy is owned by the NRW Board and maintained by the Lead Specialist Advisor, Risk.

Approval

Approved by the NRW Board [July 2021]

Version Approval

Version 2.

Strategy will be reviewed annually. Amendments will be made sooner where a relevant change in legislation or business requirement occur.

Board Paper

Paper title:	Sustainable Management of Natural Resources (SMNR) Review of Motorsport in the Welsh Government Woodland Estate
Paper Reference:	21-07-B18
Paper sponsored by:	Ceri Davies, Executive Director of Evidence Policy and Permitting
Paper Presented by:	Dave Liddy, Specialist Advisor, Recreational Safety; Dominic Driver, Head of Land Stewardship.
Purpose of the paper	Decision
Recommendation	Accept the recommendations of the review that NRW uses continued permission for motorised rallying in the Welsh Government Woodland Estate (WGWE) to work with Motorsports UK (the National Governing body) and their Affiliated Clubs to improve sustainability, especially by reducing the sport's carbon footprint while operating in WGWE.

Issue

1. Should we in Natural Resources Wales (NRW) continue to permit four-wheeled motorsports events to take place in the Welsh Government Woodland Estate (WGWE)? There has been a long history of car rallies taking place in the WGWE, with several of the large forests in mid-Wales providing venues used several times per year. Smaller events organised by local motor clubs are the platform upon which sits Wales Rally GB, the UK round of the World Rally Championship. With the climate and nature emergencies, it is time to review whether rallying in the WGWE remains a reasonable activity to permit, whether it should be stopped, or whether we should use our relationship with the sport to promote further improvements in its sustainability.

Background

2. The Master Agreement with the National Governing Body, Motorsports UK (MSUK), was revised in 2020 on the understanding that we would conduct a review of the sport against the principles of sustainable management of natural resources (SMNR), following which we would make a longer term decision on the future of motorsports in the WGWE; to allow it to continue on the current basis, to work with MSUK and their

Affiliated Clubs to improve sustainability, or to terminate the agreement with 12 months' notice and cease to permit the activity.

Assessment

3. The SMNR Review (Annex) has concluded that motorsports within the WGWE can be compatible with SMNR, on the following grounds:
 - 3.1. The majority of impacts from rallying in the WGWE sit comfortably within the SMNR space (defined by ecosystem limits, minimum achievement of human wellbeing and current policies and targets), with negative local ecosystem and community impacts reported as minor and well managed; and a range of positive economic and wellbeing impacts.
 - 3.2. The only clear breach of the SMNR space is due to system CO₂ emissions. The majority of these are attributable to spectator travel to and from rallies. Only incomplete data are available but from the evidence provided by stakeholders and available data it appears that CO₂ emissions are at a comparable level to other activities taking place on the WGWE (e.g. other recreational activities and harvesting). Nevertheless, the emissions and perhaps more importantly, the perception of emissions associated with the rallies appear significant. System stakeholders (those who operate within the rallying system) agree on the need to reduce emissions. Some credible plans, commitments and actions related to reducing CO₂ emissions are in place. However more work will be needed to reduce CO₂ emissions sufficiently.
 - 3.3. Rallying in the WGWE has well-developed stakeholder networks and relationships, governed by effective structures and processes and facilitated by established communication channels. These aspects indicate a system that is able to act coherently, with capacity to respond to challenges and deliver change. Resilience and capacity for change has been demonstrated by the system.
 - 3.4. This review and its process demonstrated the collaboration and capacity necessary to take rallying in the WGWE forward in relation to SMNR. For example:
 - 3.4.1. 37 Stakeholders including NRW SMNR experts, motorsport organisations and businesses, local communities, government and local government, other woodland recreation businesses, supporters and opponents of rallying, all engaged positively with the SMNR review.
 - 3.4.2. There was consensus among stakeholders about required change, including: reducing CO₂ emissions; biodiversity "net gain"; collaborating and leading others to deliver change.
 - 3.4.3. Senior actors within motorsports organisations expressed commitment to collaborate with NRW and others and take a lead to achieve still greater alignment with SMNR in the rallying system.
 - 3.4.4. Conversely, the resilience of the system implies that if we were to prohibit rallying in the WGWE it would probably continue in Wales on land owned by others, perhaps in relationships that are less likely to promote enhanced sustainability.

Summary

4. Rallying in the WGWE is consistent with SMNR apart from overall system CO₂ emissions. Given our leadership on the climate emergency, if proceeding with rallying within the WGWE:
 - 4.1. The priority of reducing CO₂ will require collaborative action at multiple levels.
 - 4.2. NRW operating processes will need further refinement to continue to manage environmental impacts, e.g. a habitat's risk assessment process and operational guidance.
 - 4.3. The rallying in the WGWE system will offer the potential for NRW to engage a wide audience that may otherwise not use NRW land or benefit directly from natural resources.

Options

5. There appear to be 3 general options:
 - 5.1. To allow motorsports in the WGWE to continue on the current basis relying on wider changes in society and the economy to promote further sustainability in the sport. This has the merit of simplicity and would result in an easier negotiation process so less work for us. Much of the benefit we envisage would be achieved; the sport is already reducing its emissions. However, it probably does not adequately reflect our leadership role in the climate emergency and probably exacerbates the reputational risk. Not recommended.
 - 5.2. Work with MSUK and their Affiliated Clubs to promote improvements in sustainability, especially on carbon emissions. The revised agreement with MSUK would contain clear commitments to which we can hold the organisers to account and a mechanism to take stock to inform the next agreement cycle. This is our recommended option.
 - 5.3. Terminate the agreement for motorsports in the WGWE (or any other part of the NRW Estate). Under the terms of our current agreement we would have to provide 12 months' notice. This is an attractive option if we judge that avoiding the potential reputational damage arising from the apparent environmental harm of motorised rallies is uppermost. However, for all but carbon emissions it would not reflect the evidence arising from the SMNR review. Indeed, it is counter to the evidence that rallying draws in a different set of stakeholders in natural resource use than is provided by most other recreational uses of the NRW Estate; reputationally termination would create risks of, for example, claims that we were failing to support the Welsh tourist economy. In addition, it is probable that rallying would continue on land owned by others, we would simply have "exported" the problem of carbon emissions to others. Not recommended.

Recommendation.

6. We recommend that you accept the recommendations of the review. This is that NRW uses continued permission for motorised rallying in the WGWE to work with Motorsports UK and their Affiliated Clubs to further improve sustainability, especially by reducing the sport's carbon footprint while operating in the WGWE.

Key Risks

7. The most relevant risk at Land Stewardship Business Board (LSBB) level is "LSBB10 Failure to reduce environmental damage from operations on the NRW Estate as low as reasonably practicable". The recommendation would help mitigate this risk. The decision to make the recommendation in this paper was made by the Head of Land Stewardship with advice from the LSBB and endorsed by Executive Team.
8. The tactical risk lies in motorsport being a divisive topic. The review methodology is, of necessity, complex and dynamic, and there are few comparable pieces of work to judge it against. The whole review, and the assessment methodology adopted might be brought into question and discredited.
9. Reputational damage for NRW might arise from continuing to permit motorsports to take place in WGWE despite the declared climate emergency. Conversely, by demonstrating leadership on further improving sustainability in motorsports we may be able to strengthen our reputation as leaders on the climate emergency, albeit we should accept that some opponents of motorsports are unlikely to ever accept this positioning.

Next Steps

10. If the recommendation is agreed, we will work with MSUK and their Affiliated Clubs to agree actions to further improve the sustainability of the sport and integrate these into a new Master Agreement, with a particular focus on reducing greenhouse gas emissions.
11. As for the current Master Agreement, the new Master Agreement would be signed by Executive Director of Operations on the recommendation of Head of Land Stewardship, after advice from the Land Stewardship Business Board and following scrutiny by the Executive Team.

Financial Implications

12. Motorsports events are cost neutral scenario for NRW under the Self Repair Scheme which forms a part of the Master Agreement between MSUK and NRW. Resourcing the work with MSUK to improve sustainability is covered in current resourcing.

Equality Impact Assessment (EqIA)

13. The EqIA for the Land Stewardship Service Plan is available [on request](#), and reviewed annually with each iteration of the Service Plan.¹ Accepting the recommendations of the report is consistent with the Service Plan, therefore the EqIA for the Service Plan covers the necessary equality impact assessment for the issue in this paper.

Index of Annex

Annex 1 Executive Summary – this will also be the basis of the briefing paper for the NRW Board question and answer session.

Annex 2 Final review

Annex 3 Summary SMNR Views

Annex 4 Detailed Results

Annex 5 Detailed Method

¹ For complete openness, in 2020/21 I decided that exceptionally we would not review the EqIA. This was part of the organisation wide re-prioritisation to manage workload pressures of Covid19. It will be reviewed in 2021/22.

Executive Summary

Following a long history of rallying in the Welsh Government woodland estate (WGWE), and Welsh Government support for the Wales Rally GB event (one of around 8 annual rallies in WG woodlands), Natural Resources Wales (NRW) commissioned a review to assess the activity against the practice of Sustainable Management of Natural Resources (SMNR).

The review has: -

- Contributed to the development of an SMNR review methodology (widely applicable).
- Applied this to assess the activity of motorsports in the WGWE in relation to SMNR.

The review is designed to inform decisions about the future engagement of NRW with rallying in the WGWE.

1 SMNR Review conclusions for rallying in the WGWE

Motorsports within the WGWE are compatible with SMNR as a dynamic practice, on the following grounds:

The majority of impacts from rallying in WG woodlands sit comfortably within the SMNR space (defined by ecosystem limits, minimum achievement of human wellbeing and current policies and targets), with negative local ecosystem and community impacts reported as minor and well managed; and a range of positive economic and wellbeing impacts.

The only clear breach of the SMNR space is due to system CO₂ emissions. The majority of these are attributable to spectator travel to and from rallies. Only incomplete data are available but from the evidence provided by stakeholders and available data it appears that CO₂ emissions are at a comparable level to other activities taking place in the WGWE (e.g. other recreational activities and harvesting). System stakeholders agree on the need to reduce emissions. Some credible plans, commitments and actions related to reducing CO₂ emissions are in place. However more work will be needed to reduce CO₂ emissions sufficiently.

Rallying in WG woodlands has well-developed stakeholder networks and relationships, governed by effective structures and processes and facilitated by established communication channels. These aspects indicate a system that is able to act coherently, with capacity to respond to challenges and deliver change. Resilience and capacity for change has been demonstrated by the system.

This review and its process demonstrated the collaboration and capacity necessary to take rallying in WGWE forwards in relation to the SMNR space. For example:

37 Stakeholders including NRW SMNR experts, motorsport organisations and businesses, local communities, government and local government, other woodland recreation businesses all engaged positively with the SMNR review process.

There was notable consensus among stakeholders about required change, including: Reducing CO₂ emissions; Biodiversity net gain; Collaborating and leading others to deliver change.

Senior actors within motorsports organisations expressed commitment to collaborate with NRW and others and take a lead to achieve greater alignment with SMNR in the rallying system.

Recommendations for ways forward

The review presents recommendations and observations for NRW and other stakeholders for how best to proceed with rallying in the SMNR space, including:

If proceeding with rallying within WGWE:

The priority of reducing CO₂ will require collaborative action at multiple levels.

Governance frameworks and processes need refinement and formalising to ensure all environmental impacts continue to be well managed.

The Rallying in WGWE system offers the potential for NRW to engage a wide audience that may otherwise not use NRW land or benefit directly from natural resources.

If not proceeding with rallying in WGWE

It will be important to ensure good standards of environmental impact management remain in place in other venues; and addressing CO₂ emissions will hold the same urgency.

WRGB is the only round of the World Rally Championship held within the UK and contributes a significant amount to some of the known quantitative outputs from the sport in Wales listed below. The Loss of WRGB (Cancelled in 2020 and not rescheduled in Wales during 2021) inevitably has an effect on the system, including the balance of different types of value generated and the way in which different elements of the system support each other. The presence or absence of WRGB will have a material effect on the system, and changes will be required in either scenario, but each is potentially compatible with SMNR.

Value Revealed

Stakeholders contributed to the review from a wide range of perspectives and identified a very wide range of types of value in the system (positive and negative), summarised in the table below.

A Summary of priority value in the motorsports in WGWE system		
	Visible: Current / Known	Invisible: Future / Knowable
Quantitative Outputs	<p>£9,87M Economic impact for Wales (WRGB) 100,000 + visitors (WRGB) 4,016 Volunteer days (WRGB); 5,500 Volunteer days for 5 local rallies £4,540,000 Media value (WRGB) 263.2 miles of forestry road repaired; 1:1.07 ratio used: repaired (R4W, 2017) No sig. records of: toxic spill, pollution, protected spp./habitat disturbance Net zero CO2 footprint for WRGB in 2008 <5% of carbon emissions from competing cars. Majority of emissions from travel to/from event. Informal estimate: 2460 tonnes CO₂ from fuel use for WRGB 2019; 'Typical one day' local rally estimated: 8% of emissions of WRGB</p>	<p>Full CO2 emissions for rally events Number and distance of car journeys to spectate Tourism visitors (direct/indirect) + distribution in time Economic value beyond tourism and hospitality Motorsport sustainability targets Disruption / displacement of forestry and other activities (e.g. other recreation) Displacement of illegal motorsport activity By 2022 all top world rally cars will be hybrid</p>
Qualitative Outcomes	<p>Benefits for individuals: sense of identity; recreational enjoyment; wellbeing; skills Benefits for communities: social capital; financial income; pride Significant social capital High level showcase for sport – inspiring interest and participation WRGB key component of tourism economy and strategy for Conwy; Extend visitor season - importance for tourism economies regionally International profile and showcase for Wales Perception of Rallying as env. negative & out of place with SMNR; CO₂ Emissions are 'in your face' Events use natural landscape where no other infrastructure (e.g, stadiums)</p>	<p>Importance to rural communities and economy Capacity in car clubs – trained and experienced stewards and other volunteers Well-developed governance processes (environmental; H&S; licensing; organisational) Motor organisations' sustainability commitments WG declared climate emergency + carbon neutral by 2030: Displacing emissions not the answer Other policy context Woodland for Wales Strategy: real social and community benefits; broaden engagement; opportunities and services accessible to all Comparative scale of impacts: Rallying & other activities Local economy & tourism economy</p>
Relational Value	<p>Significant voluntary capacity & collaboration Role in whole forestry management systems Strong networks and relationships, incl. Motor Clubs, MSUK relationships & governance Master Agreement (and other governance) Effective governance of environmental impacts (identification, monitoring, reporting, mitigation) History of adaptation (e.g. R4W; environmental impact management) Record of effective communication and collaboration, key to balancing needs, mitigating impacts, influencing change Inter-relationship between Club Rallying and National scale events: the two are symbiotic</p>	<p>Notable alignment and consensus among many stakeholders <i>Key themes and directions for change agreed include:</i> <i>Reduce CO₂.</i> <i>Achieve biodiversity net gain</i> <i>Capitalise on and maximise positive outcomes (including economic and engagement of a wide and possibly hard-to-reach audience</i> <i>Lead change and bring others with you (e.g. by engaging others, innovating, influencing behaviours).</i> <i>Use governance to drive, deliver and monitor improvement (e.g. using the Master Agreement)</i> <i>Collaboration and communication is key – working together facilitates change</i> <i>Using the SMNR framework to facilitate collaboration and whole system progress (at all levels).</i></p>

2 SMNR Review Method

The review was designed around participative and deliberative engagement with a wide range of stakeholders involved in the rallying in WGWE system.

The concept of value was used as a framework to help stakeholders express and collectively explore the range of things that they know to be important in the system.

The framework of SMNR was used to define a 'space' within which the motorsports system needs to operate.

The review process generated evidence about how the system relates to the SMNR space; and the potential for it to change in relation to this space in the future. This evidence included: data about the system's impacts; insight into the system's capacity and dynamic potential; experience of how system stakeholders practically collaborate and approach the challenge of aligning the system more closely with SMNR.

Despite generally poor data availability, sufficient evidence was gathered through the review to allow stakeholders to make meaningful judgements about how the most important aspects of value within the system (positive and negative) align with SMNR and what changes are necessary to increase this alignment.

Lessons for future SMNR Reviews are made in the appendices.



SMNR Review of Motorsport in the Welsh Government Woodland Estate

Headline Findings Report

RDI Associates

June 2021



**RDI
associates**

SMNR Review of Motorsport in the Welsh Government Woodland Estate

Headline Findings Report

RDI Associates

June 2021

on behalf of

Natural Resources Wales

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Acknowledgement

The authors wish to thank all those who have contributed to this study including members of the Steering Group, consultees and stakeholders with an interest in the sector, all of whom contributed willingly and generously to the study.

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Client	Natural Resources Wales			
Date	Description	Revision	Author	Checked by
12/03/21	First Draft	v1	Jake Elster-Jones	Martin Glynn
22/04/21	Second Draft	v2	Jake Elster-Jones	Martin Glynn
30/04/21	Final Draft	v3	Jake Elster-Jones	Martin Glynn
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07/06/21	Final (revised)	v5	Jake Elster-Jones	Martin Glynn

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1. BACKGROUND AND AIMS

Motorsport in Welsh woodlands has a long history and the Welsh Government (WG) has provided significant financial support over many years to the annual Wales Rally GB event (one of around eight rally events that take place in Welsh Government owned woodlands annually¹). For example, WG has provided financial support to WRGB in excess of £800,000 over the 3 years before 2020². This support has primarily been justified by the economic benefit and international profile that this major event provides for Wales.

A possible tension had been identified between WG support for, and hosting of, motorsports and commitments to respond to the nature and climate emergencies. On the one hand, motorsport was seen to represent a potential clash with responses to the climate emergency and represents a 'relatively high-risk activity' in relation to environmental damage, health and safety and disruption of quiet enjoyment³. At the same time, positive benefits such as broad engagement with and use of the NRW estate and the economic benefits mentioned above, were apparent. Motorsport's governing body, Motorsport UK (MSUK), had also set out strategic priorities for decarbonisation and innovation and indicated their wish to work with NRW to support the WG climate change agenda⁴.

This led to a decision by the Natural Resources Wales (NRW) board to carry out an SMNR Review of Special Stage Motorsports Rallies in the Welsh Government Woodland Estate (WGWE), while continuing to allow motorsport in NRW woodlands in the short and medium term (subject to conditions such as work towards decarbonisation and review after 2 years informed by this SMNR review and wider WG policies). This review was commissioned as a result of this decision and RDI Associates were appointed to conduct the work.

1.1 REVIEW AIMS

The aim of the review was to assess the activity of motorsport in the WGWE against the practice of SMNR, in order to inform NRW's long-term approach to motorsport.

The review specification required:

- Collection of evidence from a wide range of stakeholders involved in motorsport in WG woodlands, including specialist input from NRW staff.
- Desk research to gather data to compliment and quantify evidence provided by stakeholders.
- Assessment of Special Stage Motorsport in WG woodlands against SMNR.
- Consideration of the potential for changes to motorsport in WG woodlands and implications for SMNR.

1.2 DESIGNING AN SMNR REVIEW

Part of the task of this review has been to develop an approach to carrying out an SMNR review of an activity (applied in this case to Special Stage Motorsport in the WGWE). There is no established method for reviewing practice in relation to SMNR (the Sustainable Management of Natural resources). Although NRW have developed a range of frameworks to help assess progress towards SMNR (such as the Four Measures and Five

¹ There are currently seven rallies run over a single day in Wales plus WRGB which runs over four days. In addition, The Roger Albert Clark Rally, a major event for historic rally cars, runs every two years with some of the stages being on NRW property.

² ((NRW), Undated (1))

³ Ibid:2

⁴ Ibid

Step Method – see below)⁵, this work has mainly taken place in the context of the State of Natural Resources Report (SoNaRR) which assesses progress towards SMNR at a national level – judged against broad habitat types and cross-cutting themes. The SMNR review of motorsports represents one of the first attempts to review a specific activity (rather than broad habitat class or theme at the national level) in relation to SMNR⁶

This review has the dual task of developing an SMNR review methodology, which is relevant to any specific activity or system; as well as applying this approach to the specific example of motorsports in the WGWE.

1.3 REPORT STRUCTURE

The main, interlinked, tasks of the review are:

- To contribute to the development of an SMNR review methodology.
- To apply this to an assessment of the activity of motorsports in the WGWE in relation to SMNR.

This report presents a summary of findings from these two main tasks. A series of annexe reports provide the extensive, detailed evidence that supports the findings, as follows:

Annexe	Contents
Annexe 1: Summary Analyses to inform review conclusions	<ul style="list-style-type: none"> • 1 Page overview • Revaluation 6-Box summary of priority system value • Assessment against the 4 Measures / Aims of SMNR • Assessment against SMNR boundaries • Assessment of potential to achieve net benefit • Discussion of interaction between motorsport in WGWE and other systems • Evidence about system capacity for change • Discussion of alignment with SMNR principles
Annexe 2: Review Results	<ul style="list-style-type: none"> • Part 1: The range of impacts and value in the motorsport in WG woodlands system • Part 2: Detailed evidence and data for types of value identified as a priority by system stakeholders • Part 3: Workshop reports
Annexe 3: Review method	<ul style="list-style-type: none"> • Detailed description of approach to developing an SMNR review methodology • Detailed Method for the SMNR review of Motorsports in WGWE • Further information about the Revaluation Framework



⁵ (<https://naturalresources.wales/evidence-and-data/research-and-reports/state-of-natural-resources-interim-report-2019/assessment/?lang=en>, Accessed 07/2020)

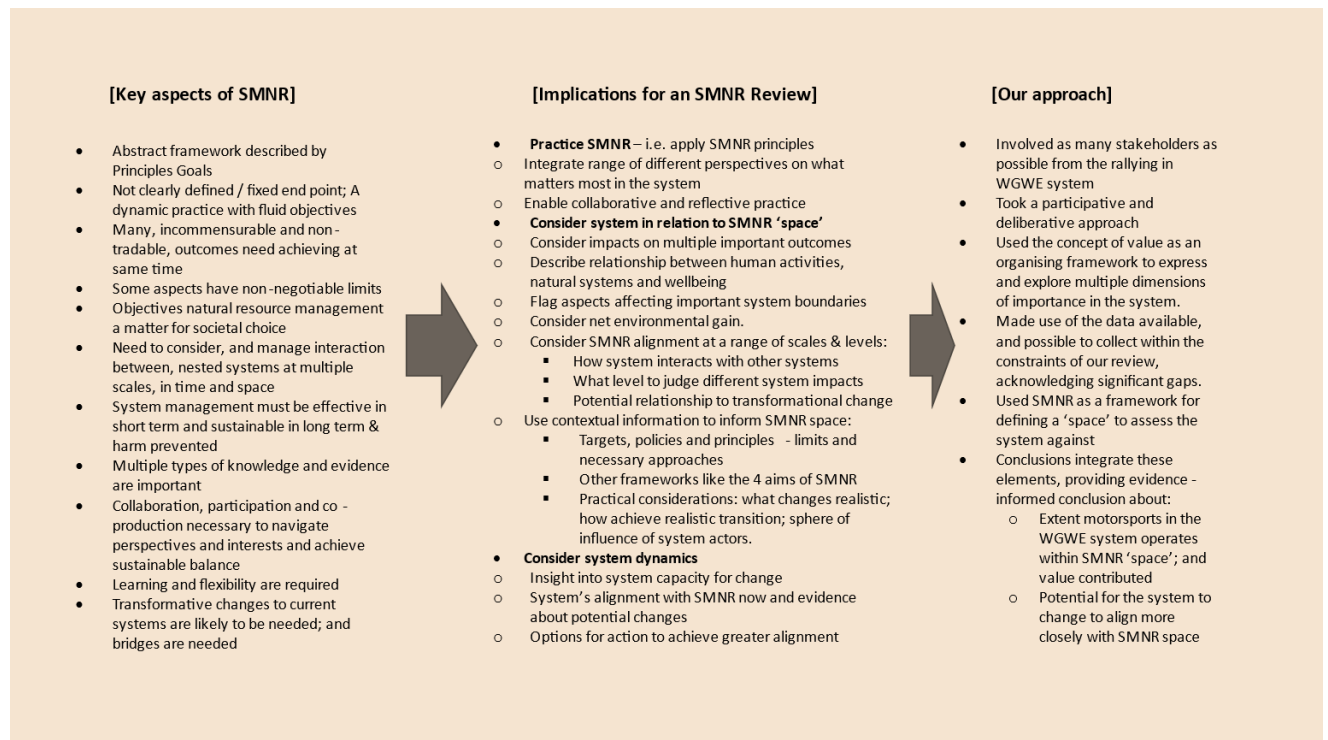
⁶ (Elliott, Pers. Comm.)

2. DEVELOPING AN SMNR REVIEW METHODOLOGY

2.1 SUMMARY OF APPROACH TAKEN TO DEVELOP A REVIEW METHODOLOGY:

We began by considering key dimensions or aspects of SMNR and the implications for what an SMNR review might require. We then developed a practical approach within the scope of the current review that put these requirements into practice. This process is summarised in the Figure and text below and described in detail in Annex 3. Learnings that emerged from the process are presented following the review conclusions below.

Figure 1: Summary flow of method development



2.2 INTRODUCTION AND SMNR

Our approach began by considering Special Stage Motorsport in the Welsh Government woodland estate as a complex system (involving multiple actors with different perspectives and objectives interacting dynamically at a number of different scales). The task was then to find ways of carrying out an SMNR review of this system.

Some key aspects of SMNR that need to inform any review, include:

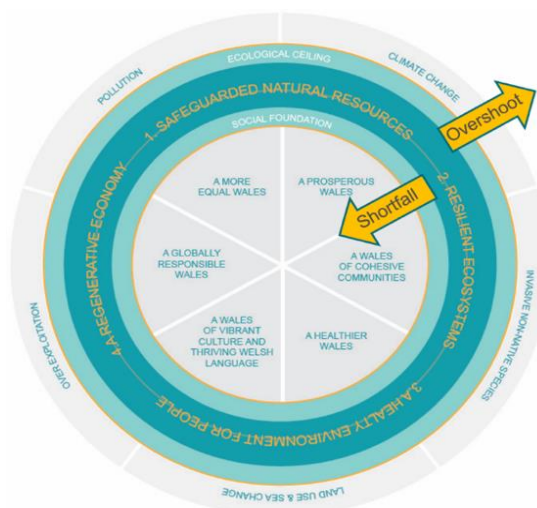
- SMNR is an abstract framework described by Principles (designed to guide action so that it will contribute to greater SMNR) and high-level Goals and objectives (setting direction and providing a yardstick to judge progress against).
- SMNR is not a clearly defined or fixed end point, but rather describes a dynamic practice, with fluid objectives (sustainability and wellbeing goals).
- A number of different outcomes of importance need to be achieved at the same time and cannot be traded off against each other (e.g. ecological health and human wellbeing).
- Some aspects in consideration need to be managed within non-negotiable limits, such as the limits of ecosystem functioning.

- Important outcomes often cannot be easily measured and where measures are possible they are often incomparable.
- Objectives for management of natural resources are a matter for societal choice.
- It is necessary to take into account, and manage the interaction between, nested systems at multiple scales, in time and space (e.g. the need to protect biodiversity in a landscape, maintain farm incomes and local economies and address global phenomena such as climate change).
- The management of the system needs to be effective in the short term and sustainable in the long term, with prevention of significant ecosystem damage or negative impacts on human wellbeing, an important principle.
- Multiple types of knowledge and evidence about systems need to be taken into account.
- Collaboration, participation and co-production, are considered necessary to navigate multiple perspectives and interests and achieve a sustainable balance of outcomes.
- Learning and flexibility are required to achieve sustainability in complex, dynamic systems, where change is inevitable and causation is often non-linear (so straightforward prediction is rarely possible).
- Transformative changes to current systems are likely to be needed to achieve integration of conservation and use and SMNR⁷. Transformation of existing systems is not straightforward and can rarely be achieved quickly. The concepts of transition or a bridge⁸ are relevant – it is necessary to find ways of maintaining wellbeing and stemming losses and damage to the natural world in the short-term while ensuring activities and investment contribute to longer-term transformation.

The SMNR 'Space'

SoNaRR 2020 uses the doughnut economics model (together with the Welsh well-being goals) to describe a 'safe space for sustainable development and the achievement of the well-being goals'⁹. This conceives of SMNR as an operating space with no ecological overshoots or wellbeing shortfalls.

Figure 2: The Doughnut economics model used to describe a space for SMNR



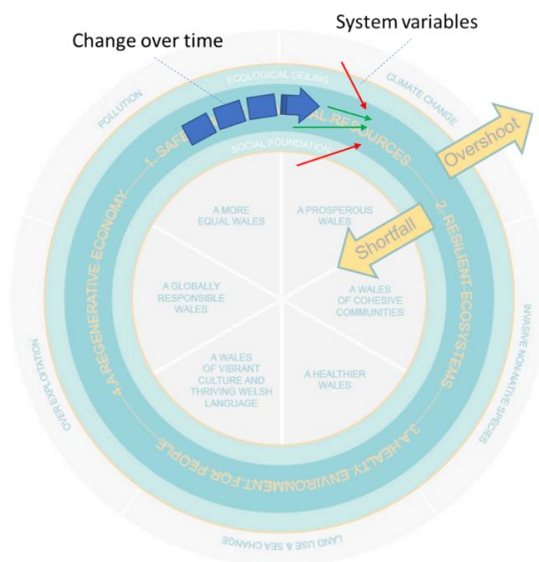
⁷ E.g. (NRW, <https://naturalresources.wales/evidence-and-data/research-and-reports/state-of-natural-resources-interim-report-2019/responses/?lang=en>, accessed 12/20)

⁸ (NRW, 2021)

⁹ (NRW, 2021)

Our method adds a dynamic dimension that considers travel over time, during which a system's outputs and outcomes will vary in relation to the SMNR space. SMNR then becomes a journey during which a system needs to adjust to move within – and remain within – the safe operating space of SMNR over time. This allows us to judge the performance of a system currently, while judging its ability to better align with SMNR over time (including the likelihood of this happening and timescale over which it might happen).

Figure 3: A system moving in relation to the SMNR Space over time



2.3 REVIEW APPROACH AND METHOD

Our SMNR review of motorsport in the WGWE took a practical approach within the constraints of the review (e.g. the time available and our capacity to collect new data). The approach and method were developed on the basis of the requirements and observations that follow from a detailed consideration of SMNR (discussed under 'Recommendations for an SMNR Review process', below). Our approach drew on existing frameworks for SMNR assessment and other considerations discussed by participants in our review and in SoNaRR 2020 (summarised in Annexe 3). We carried out this development in discussion with NRW staff (some of whom have been involved with developing the SoNaRR reporting process).

The detailed method is described in Annexe 3. The main components of our approach can be summarised as follows:

- We involved as many stakeholders as possible from the motorsport in WGWE system, given the constraints of the review (e.g. we interviewed around 37 stakeholders, over twice as many as allowed for in our original proposal).
- We took a participative and deliberative approach (using two stakeholder workshops and an iterative approach to generating evidence about the system). We provided opportunities for many of the stakeholders involved in the review to:
 - Contribute on more than one occasion.
 - Work with us, collectively, to refine and understand the evidence about the system.
 - To work together to discuss and negotiate potential ways of changing the system to achieve greater SMNR.
 - Ground exploration of the system in relation to SMNR in the appropriate context. Stakeholders understand the practical constraints and opportunities in their system, including relevant policies,

targets and boundaries, as well as financial models, extent of influence of different actors and relationships.

- We balanced the need to collect evidence from as wide a range of system stakeholders as possible (and ensure that they felt able to contribute their perspectives openly), with the need to ensure that the review met NRW's needs. For example, one of the review workshops exclusively involved NRW staff. The purpose of this stage of the review was to check what the priority types of value in the system are from the perspective of NRW. This was important as the review was required to help NRW decide how to engage with motorsports in the WGWE going forwards and this decision needs to be made in relation to NRW priorities and policies.
- We used the concept of value (what matters) as an organising framework to express and explore multiple dimensions of importance in the system. Value is a useful concept as it encompasses material outputs and qualitative outcomes as well as underlying dimensions of a system such as structure, process, capacity and direction of change. Value is also an effective 'platform' around which stakeholders can explore and negotiate what is important in a system and how the system might change. We specifically made use of an existing framework developed to provide an accessible and intuitive tool that stakeholders can use to explore and negotiate about value (known as Revaluation).



- We made use of the data available, and possible to collect within the constraints of our review. It should be noted that many aspects of value considered important by system stakeholders are not measured and so there will always be gaps in data (this issue is discussed further below). Robust conclusion and decisions will still be possible since data is only one type of evidence that is needed to make a judgement about SMNR and is not sufficient on its own (even where there is a lot of it).
- We used SMNR as a framework for defining a 'space' within which the system needs to operate. This space was defined using a range of considerations, including: existing frameworks like the 4 measures / aims of SMNR; ecosystem and wellbeing limits, as indicated by policies, aims and scientific understanding; practical and contextual insights provided by review participants.
- Our conclusions about the system in relation to SMNR are based on bringing these elements together to provide an evidence informed conclusion about:
 - The extent to which the motorsports in the WGWE system operates within the necessary SMNR 'space' and the value it contributes within this space.
 - The potential for the system to change so it aligns more closely with this SMNR space (reducing negative impacts, eliminating boundary overshoots and maximising positive contributions to wellbeing and a regenerative economy), based on:
 - Evidence about system capacity and resilience
 - Evidence about likely direction of change in the system
 - Evidence about context (including within the system itself and in relation to other wider systems and transitions).
 - Evidence about stakeholder commitment to change and the extent to which stakeholders have demonstrated an ability to work together to identify and agree necessary changes through the review process.

In this way, the review conclusions represent a balance between measurement and process, informed by the policy framework. Just as SMNR is defined by principles and goals, judgements about SMNR cannot be reduced to a technocratic set of indicators. Data are important to help make decisions within a system, for example in understanding or flagging outcomes that infringe on important boundaries such as ecosystem health or human wellbeing. However, data are not sufficient on their own for a number of reasons, including:

- Many outcomes of importance in a complex system will be hard or impossible to measure; or may not have been measured in a given situation.
- Data alone cannot determine what the best approach will be to optimising multiple important or essential, but incommensurable and non-substitutable, outcomes.
- A characteristic of complex systems is that there is no one 'right' pathway or solution. Data can help inform negotiations between different stakeholders with different interests but do not answer the question of what pathway to take on their own.

Data availability is discussed in detail in Annexe 2. However, in summary we can distinguish a number of shortcomings in the data we could gather for this study, including:

- Some important aspects of value have no data available that is relevant to them (because it would be impossible to generate, or because data has not been collected in this context)
- Some of the available data is limited in scope (e.g. only covers some aspects of an element of value), robustness and quality (e.g. Much of the available data is contained in non-academic documents that lack detail; Where more detailed or academic reporting has been available, this has been significantly out of date)
- The scope of this review has meant that we could not collect primary data to fill any gaps.

As stated above, gaps in data cannot be avoided in complex systems. In addition, however much data there is, it is insufficient on its own to understand and make decisions about SMNR. In a complex system, therefore, we need to ensure that there is sufficient evidence to meaningfully inform system understanding, decisions and negotiations among stakeholders. This will include the need to ensure that dimensions of the system where potential breaches of important boundaries may occur are sufficiently understood and monitored. It will also need to include evidence about system structure, capacity and plausible directions of change.

Thus, despite data gaps, this review has collected a good range of evidence that enables meaningful conclusions about the alignment of the motoring in WGWE system with SMNR. These conclusions rest on the mixture of evidence collected (from stakeholder contributions, available data and the outcomes of the review process) about:

- The dynamic potential of the system.
- The performance of the system in relation to the SMNR space.
- Real-world work by system stakeholders to identify and negotiate what matters most in the system and the potential for change.

An SMNR review should not be expected to produce a simple unidimensional conclusion about an activity (as a traditional cost benefit analysis might). However, application of the method we have developed to the Motorsports in WGWE system has shown that an SMNR review can produce meaningful evidence that can help us understand the alignment of a system with SMNR and the potential to move the system towards greater alignment. This includes evidence of any breaches of important boundaries (limits of ecosystem functioning or human wellbeing) and the ability of the system to address these breaches.

3. AN ASSESSMENT OF MOTORSPORTS IN THE WGWE AGAINST SMNR

3.1 VALUE REVEALED IN THE MOTORSPORTS IN THE WELSH GOVERNMENT WOODLAND ESTATE SYSTEM

37 stakeholders contributed to the review from the following groups:

- NRW
- Motor sport organisations
- Motor sport businesses
- Welsh Government (events and forest policy units)
- Conwy County Borough Council
- Local communities affected by motorsport
- Businesses associated with other recreational uses of woodlands (e.g. mountain biking)
- Forestry and Land Scotland
- Other organisations managing woodlands where motorsport might take place (Confor, Dwr Cymru and the Woodland Trust)

This review focused on engaging with and gathering evidence from stakeholders who are closely involved in the motorsports in WGWE system in some way. This followed the list of key stakeholders listed in the specification as well as being in line with the observation that those involved in a complex system understand it best. In this way, the review focused on developing detailed understanding of the system and was not designed as a consultation (which would provide a wider but less specialist view of the system). Within this constraint, we spoke to a wide range of system stakeholders in order to gather evidence from a range of perspectives, including those:

- involved in running and governing motorsport activities
- with expertise in a wide range of environmental and sustainability fields within NRW
- with an interest in tourism and economic impacts
- living in areas where motorsport take place
- managing woodlands within different organisational contexts (and with different organisational remits)
- running other recreational activities in the WGWE
- governing motorsports and other activities in a different policy context (e.g. in Scotland).

This approach provided evidence about system impacts and value from a range of perspectives that represent a good range of interests in the system and different positions relating to motorsport.

Value revealed by stakeholders

Together, these stakeholders identified a very wide range of value in the Motorsports in the WGWE system (including negative and positive aspects of value). The aspects of value in the system agreed to be most significant by stakeholders taking part in the two review workshops can be summarised as follows:

Figure 4: A summary of priority value in the motorsports in WGWE system

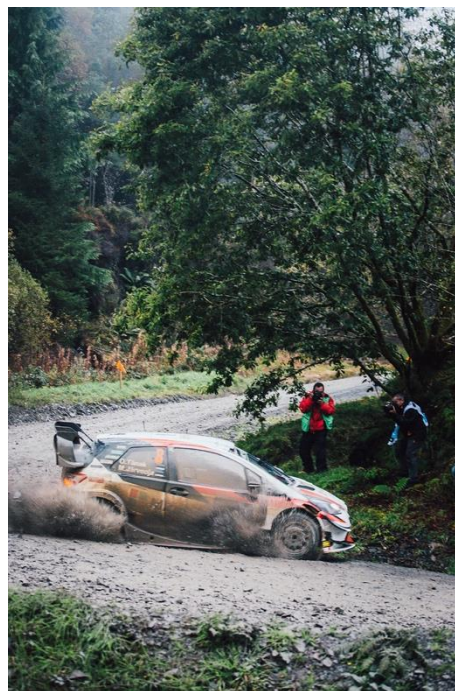
	Visible: Current / Known	Invisible: Future / Knowable
Quantitative Outputs	<ul style="list-style-type: none"> • £9,87M Economic impact for Wales (WRGB) • 100,000 + visitors (WRGB) • 4,016 Volunteer days (WRGB); 5,500 Volunteer days for 5 local rallies • £4,540,000 Media value (WRGB) • 263.2 miles of forestry road repaired; 1:1.07 ratio used: repaired (R4W, 2017) • No sig. records of: toxic spill, pollution, protected spp./ habitat disturbance • Net zero CO2 footprint for WRGB in 2008 • <5% of carbon emissions from competing cars. Majority of emissions from travel to/from event. • Informal estimate: 2460 tonnes CO₂ from fuel use for WRGB 2019; 'Typical one day' local rally estimated: 8% of emissions of WRGB 	<ul style="list-style-type: none"> • Full CO2 emissions for rally events • Number and distance of car journeys to spectate • Tourism visitors (direct/indirect) + distribution in time • Economic value beyond tourism and hospitality • Motorsport sustainability targets • Disruption / displacement of forestry and other activities (e.g. other recreation) • Displacement of illegal motorsport activity • By 2022 all top world rally cars will be hybrid
Qualitative Outcomes	<ul style="list-style-type: none"> • Benefits for individuals: sense of identity; recreational enjoyment; wellbeing; skills • Benefits for communities: social capital; financial income; pride • Significant social capital • High level showcase for sport – inspiring interest and participation • WRGB key component of tourism economy and strategy for Conwy; Extend visitor season - importance for tourism economies regionally • International profile and showcase for Wales • Perception of Rallying as env. negative & out of place with SMNR; CO₂ Emissions are 'in your face' • Events use natural landscape where no other infrastructure (e.g, stadiums) 	<ul style="list-style-type: none"> • Importance to rural communities and economy • Capacity in car clubs – trained and experienced stewards and other volunteers • Well-developed governance processes (environmental; H&S; licensing; organisational) • Motor organisations' sustainability commitments • WG declared climate emergency + carbon neutral by 2030: Displacing emissions not the answer • Other policy context • Woodland for Wales Strategy: real social and community benefits; broaden engagement; opportunities and services accessible to all • Comparative scale of impacts: Rallying & other activities • Local economy & tourism economy
Relational Value	<ul style="list-style-type: none"> • Significant voluntary capacity & collaboration • Role in whole forestry management systems • Strong networks and relationships, incl. Motor Clubs, MSUK relationships & governance • Master Agreement (and other governance) • Effective governance of environmental impacts (identification, monitoring, reporting, mitigation) • History of adaptation (e.g. R4W; environmental impact management) • Record of effective communication and collaboration, key to balancing needs, mitigating impacts, influencing change • Inter-relationship between Club Rallying and National scale events: the two are symbiotic 	<ul style="list-style-type: none"> • Notable alignment and consensus among many stakeholders • <i>Key themes and directions considered important and realistic for change agreed include:</i> <ul style="list-style-type: none"> ○ Reduce CO₂. ○ Achieve biodiversity net gain ○ Capitalise on and maximise positive outcomes (including economic and engagement of a wide and possibly hard-to-reach audience) ○ Lead change and bring others with you (e.g. by engaging others, innovating, influencing behaviours). ○ Use governance to drive, deliver and monitor improvement (e.g. using the Master Agreement) ○ Collaboration and communication is key – working together facilitates change ○ Using the SMNR framework to facilitate collaboration and whole system progress (at all levels).

3.2 SMNR REVIEW CONCLUSIONS

The evidence collected through this review lead us to conclude that motorsports within the Welsh Government Woodland Estate (the motorsports in WGWE or woodlands system) are compatible with SMNR (as a dynamic practice), on the following grounds (summarised in Figure 5 below):

- The majority of the impacts from motorsport in WG woodlands sit comfortably within the SMNR space (as defined by ecosystem limits, minimum achievement of human wellbeing and current policies and targets). Specifically:
 - Stakeholders within NRW were agreed that impacts on ecosystems and ecosystem resilience at the local level are minor and well-managed. Some questions were raised about the extent to which all potential local scale environmental impacts are monitored and reported and NRW staff have started updating and formalising internal systems to ensure that any shortcomings are identified and addressed.
 - Economic impacts are positive and significant (most notably, the headline figure of £9.87M contribution to the Welsh economy from the 2019 WRGB event; but also impacts deemed significant by Welsh motorsport businesses and local hospitality sectors).
 - Other wellbeing impacts are also positive and significant (including: the level of volunteering in the system; the social capital in the system; recreational enjoyment from natural resources for a large number of people; motorsport represents a way in which a wide audience of people benefit from natural resources, many of whom may not otherwise use WG woodlands).
 - Negative wellbeing impacts were reported to be minor and well managed (specifically disturbance to individuals and communities locally).

- The only clear potential breach of the SMNR space relates to carbon emissions. Detailed data about CO₂ emissions for the whole system are not available and so the precise details are unknown. However, the available data and stakeholder evidence highlight the following considerations relevant to this impact:
 - Three studies of CO₂ emissions associated with WRGB (1 certified carbon audit, one formal evaluation report and one informal study) concluded that a significant majority of emissions (>75%) are associated with car travel by spectators, competitors and organisers to and from rally events (rather than from competing cars).
 - While a detailed audit of CO₂ emissions from the motorsport in WG woodlands system is not available, the evidence we have collected (data and stakeholder opinions) suggests that emissions generated by motorsport activities are at a comparable level with those from other activities within the woodlands, including forestry operations and other recreational activities (such as mountain biking).
 - Emissions from spectator travel are considered to be of a comparable level comparable with emissions from travel for other recreational activities within the WGWE and other public land (based on knowledge of visitor numbers for these different activities and the mode of transport used to access recreational activities). As a result, it seems appropriate to consider the carbon emissions from travel to and from events as part of the wider challenge to reduce emissions from recreational travel. A similar conclusion is made in Forestry England's recent Motorsports Review¹⁰.
 - Excluding motorsport from the WGWE was considered by stakeholders unlikely to reduce the number of rally events, as stakeholders report that they would expect rally events to continue in other settings. As a result, stakeholders judged that climate change impacts are likely to be displaced rather than reduced if motorsport ceased to take place in the WGWE (including the NRW climate change expert involved in the workshops).
 - Activity is already underway to address carbon emissions associated with the competing vehicles and support teams and targets for material changes are in place within motorsport organisations.
- The motorsports in the WGWE system has well developed networks and relationships between key stakeholders and actors. These networks and relationships are governed by well-developed informal and formal structures and processes. Channels for communication between the different stakeholders and actors exist and largely work well. These aspects mean that the system is able to act coherently and has significant capacity to respond to challenges and achieve change. This capacity has been demonstrated by previous changes and adaptations within the system and resilience to problems and challenges.
- Despite the anticipated tensions between environmental and motorsport sectors, the review process revealed notable consensus between system stakeholders (including within NRW and motorsport organisations) about the changes that were needed within the system to achieve greater SMNR, in



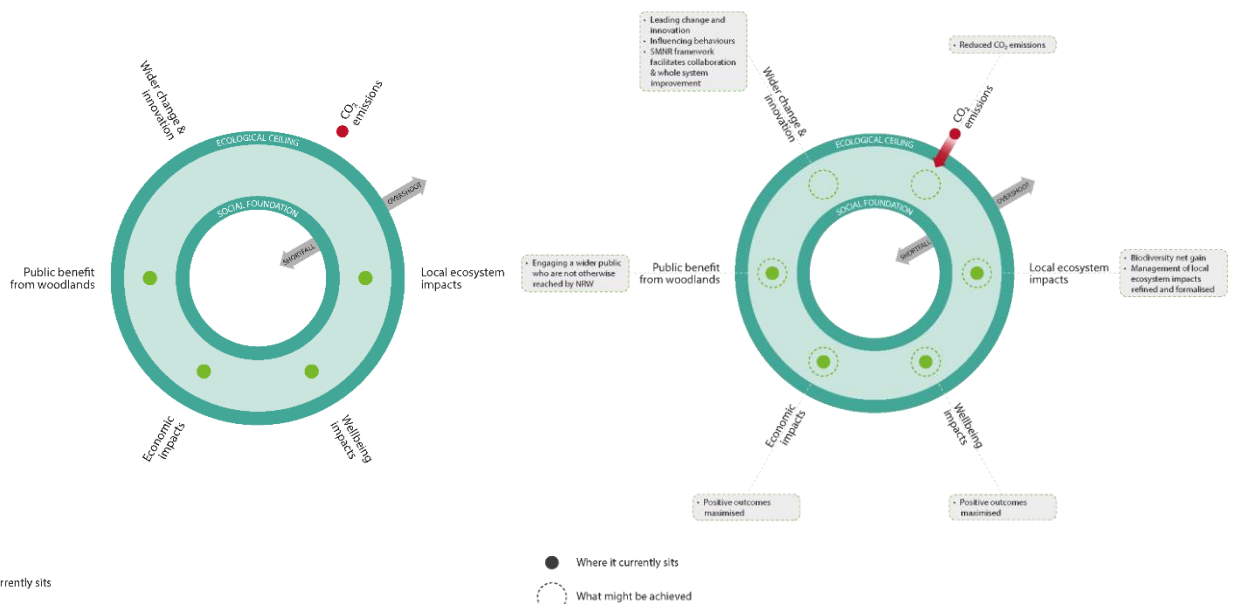
¹⁰ (Rural Solutions, 2020)

particular the need to address CO₂ emissions. Key directions or changes identified in collaborative discussions included:

- Reduce CO₂.
- Achieve biodiversity net gain.
- Capitalise on and maximise positive outcomes (including economic benefits and engagement of a wide and possibly hard-to-reach audience).
- Lead change and bring others with you (e.g. by engaging others, innovating, influencing behaviours).
- Use governance to drive, deliver and monitor improvement (e.g. using the Master Agreement).
- Working together to facilitate change: collaboration and communication is key.
- Using the SMNR framework to facilitate collaboration and whole system progress (at all levels).
- Commitment was expressed by senior actors within motorsport organisations to collaborative working to address the changes needed and take a lead to achieve greater alignment with SMNR. Motorsport organisation policies and targets provide further context to suggest that these organisations are committed to addressing key sustainability issues (including climate impacts).
- A significant number of key stakeholders involved in this SMNR review, from motorsports organisations at all levels and from within NRW, actively and positively engaged with participative deliberation about the motorsports in WGWE system. This engagement demonstrated the capacity for those in the system to work together and to identify and agree key aspects of value and key changes needed, recognise the need to bring the system into greater alignment with SMNR (within the SMNR ‘space’) and also demonstrated commitment to collaboration to this end.

Figure 5 provides a graphic representation of the findings of this study, indicating how impacts from Motorsports in the WGWE lie within or outside the SMNR ‘safe space’, represented by the doughnut economics model used in SoNaRR (left). It also represents the dynamic nature of the system, indicating plausible potential changes in outcomes from rallying in relation to the SMNR space (right).

Figure 5. Alignment of impacts from Motorsports in the WGWE with SMNR: a dynamic representation

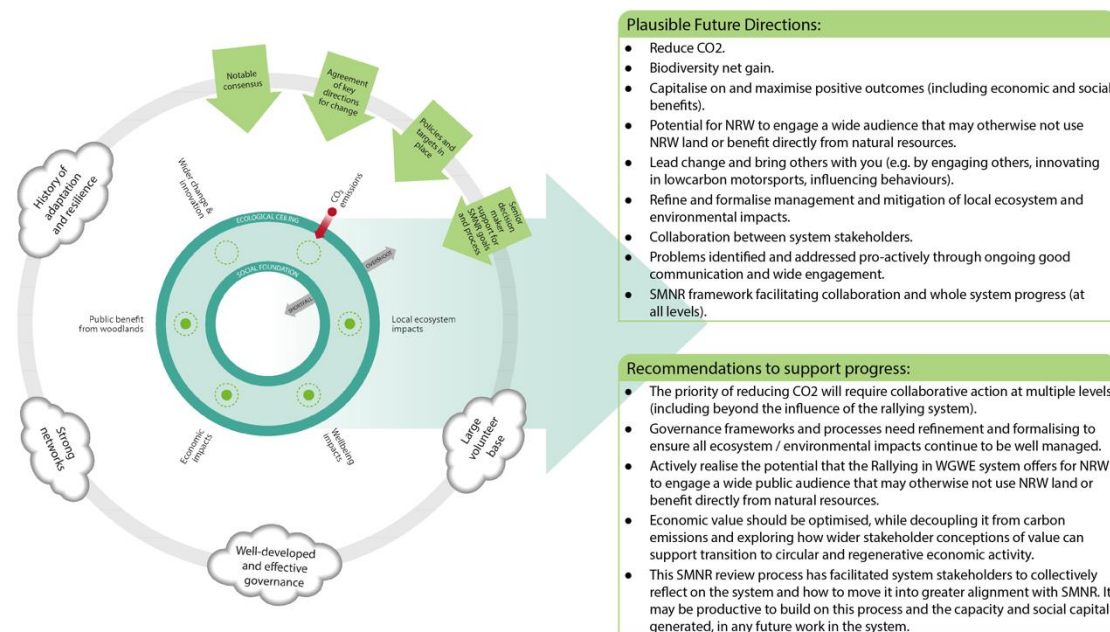


Graphic adapted from Kate Raworth's *Doughnut Economics* (Penguin, 2017)

Graphic adapted from Kate Raworth's *Doughnut Economics* (Penguin, 2017)

Figure 6 places the findings about impacts in the context of our study's assessment of the underlying capacity and direction of the Motorsports in the WGWE system. As discussed, these aspects of the system provide essential context to judge the alignment of a dynamic system with the practice of SMNR.

Figure 6. Motorsports in the WGWE and SMNR: System capacity, direction and impacts in relation to the SMNR space



Graphic adapted from Kate Raworth's *Doughnut Economics* (Penguin, 2017)

3.3 POTENTIAL WAYS FORWARDS: RECOMMENDATIONS AND OBSERVATIONS

The decision of how to engage with motorsport in the WGWE going forwards remains one for NRW and WG and will be partly political and strategic, as well as based on an SMNR assessment. The following recommendations and observations from the review should be considered in order to increase the positive value of motorsports in the WGWE and its alignment with SMNR:

- Working with all stakeholders in the system to reduce CO₂ emissions will need to be a co-ordinated task. This will need to take place at various scales, including:
 - Work with motorsport organisations and rally competitors to reduce the carbon footprint of rally competitors and their support teams.
 - Use work with rally competitors and teams as a way of engaging the wider community of rally fans with behaviour changes (including their mode of travel to attend rallies) and awareness raising.
 - Work on transitions at wider scales, including addressing the carbon footprint of all travel for recreation on WG land; and transitioning to more sustainable transport systems at the national level.
 - The relative significance of the carbon impact of stone extraction for road repair was raised by some stakeholders. The data on the significance of this part of the system was not available to this review and this should be looked at in more detail.

- Refine and formalise governance frameworks and processes to ensure all environmental impacts identified, monitored and managed. Available evidence is that local environmental impacts from motorsport are well understood, monitored and managed. However, NRW staff did identify:
 - Specialist areas where there is a possibility that some impacts are not sufficiently monitored and so may be missed (e.g. biosecurity).
 - Some of the environmental impact assessment, monitoring or management is carried out via informal internal processes that rely on the expertise and experience of specific members of staff. The need to formalise some of these processes and ensure they are captured so that others can carry them out effectively was identified.
 - Some specific areas where further improvements to processes could be made (e.g. specific recommendations around reducing risk of water pollution¹¹)
 Stakeholders within NRW agreed that work should be carried out to review and where necessary refine or formalise this aspect of system governance and work has already begun.
- The motorsport in WGWE system offers the potential for NRW to reach and engage a wide audience of people, and there is some evidence that this audience are not otherwise regular users of NRW land (and possibly less likely to be benefitting from natural resources). Potential that could be explored includes:
 - Increasing the number of people benefitting from the WGWE.
 - Communicating and engaging people involved in motorsport with sustainability messaging and actions.
 - Building relationships between NRW and a large body of volunteers.
 - Engaging rally volunteers with habitat restoration or creation (e.g. one rally organiser suggested that the volunteers involved with her Motor Club may be interested in this sort of activity to help achieve biodiversity net gains).
- The significant economic value associated with motorsport in the WGWE should be optimised within the SMNR space and opened up to stakeholders' wider considerations of value. How this impact is felt will depend on whether WRGB is running in any given year or not but will remain important even in years where it is not running. It will be important to consider how this element of value relates to the wider ambition to transition to a regenerative and more circular economy. Some specific considerations to look at will include:
 - How can economic value be decoupled from carbon emissions (especially given the strong link with the visitor economy)?
 - The tourism economy raises its own sustainability issues and this will be a wide system transition that will be relevant to the impact of motorsport, economically and environmentally.
 - Is it possible to increase the share of economic value that accrues to non-tourism parts of the local and Wales economies?
 - What developments can be explored to integrate the rally into circular economic activity at local and national scales?
- If motorsport does not continue on the WGWE, it will be important to ensure that as good standards of environmental impact management are in place at other venues that are used for rally events.
- It is worth noting that other organisations that may potentially host rally events are unlikely, in comparison to NRW, to have: the same requirements to achieve SMNR, the same public purpose (to consider wellbeing of all people in Wales – i.e. are likely to have a narrower public good remit or set of

¹¹ See notes included in NRW Stakeholder workshop report (Elster-Jones, 2021a)

beneficiaries to consider); or the same level of expertise in SMNR and ecological protection. NRW may therefore be fairly uniquely placed to steer progress towards greater SMNR and meet wellbeing goals.

- The SMNR review process has provided a context in which multiple stakeholders involved in the system have together reflected on the system, developed their understanding of the system and negotiated potential ways that the system could change. It could be useful to consider how this progress – and the social capital built up through the review – could be built on to continue to facilitate collaborative action for change in the system.
- It is important that as wide a range as possible of people are engaged with achieving SMNR (as stated, WG consider everyone in Wales to have a stake and a role). This review has attempted (within the resources available) to engage and involve as many stakeholders from as wide a range of relevant groups as possible. Any future work with the motorsport system should continue this approach and explicitly work to engage as wide an audience as possible (including non-expert citizens). Engagement should be as ‘open-sided’ as possible (all interested stakeholders should be free to participate). Using the concept of value as an accessible, multi-dimensional platform around which different stakeholders can collaborate to understand and negotiate about what matters, may facilitate this process. The methods used will also be important and some form of participative and deliberative approach is likely to provide more meaningful insight than a method such as consultation (see more detailed discussion under section 4.1 below . Consideration of desirable directions for the motorsport in WGWE system, together with key positive or negative aspects of the system, can suggest a set of indicators that could aid judgement about future change. Potential indicators are suggested in Annexe 1, section 3. These should not be considered

sufficient on their own as ongoing collaborative learning by system stakeholders will remain important to steer the system within the space of SMNR. Any indicators should also be developed in dialogue with as wide a range of system stakeholders as possible.

- Wales Rally GB was cancelled in 2020, due to Covid-19 and the announcement has been made that it will not take



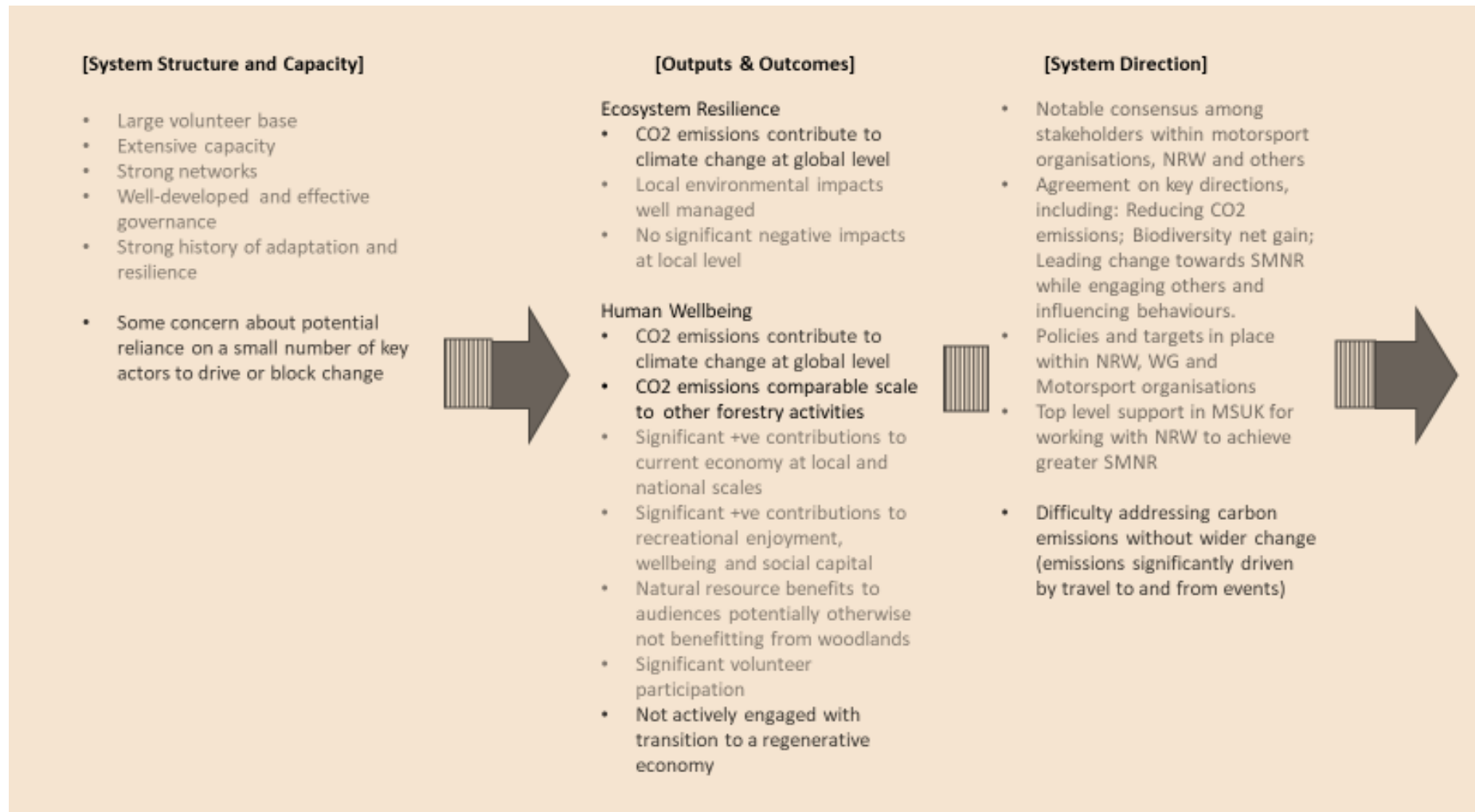
place in 2021 either. It is unclear whether the event will continue as a regular part of the motorsport in WGWE system in the future. Given that this is the most high-profile rally event in the system, which generates some of the most striking headline impacts (especially the economic impact generated and the international profile afforded to Welsh landscapes), it will be important to consider future scenarios that do and do not include WRGB as part of a motorsports system. Predicting future scenarios involves a lot of uncertainty and many of the different aspects of (positive and negative) value in the system are interlinked, so it is not possible to make any certain predictions. However, the scenario of no WRGB was discussed by stakeholders in the multi-stakeholder workshop and during interviews. The following relevant points can be reported from this evidence:

- WRGB is the most significant rally for tourism and the visitor economy, with one workshop participant suggesting that it could account for as much as 80% of economic value to this sector. It is also the only rally that contributes significantly to Wales’ international profile and promotion.
- Some other economic impacts from rallies are less skewed towards WRGB. For example, one stakeholder involved in a motorsport business estimated that WRGB accounted for less than 10% of their business, although this still represents an important component of the business.

- Similarly, evidence suggests that WRGB accounts for a majority of CO2 emissions from the motorsport in WGWE system, due to the large number of visitors it attracts.
- Stakeholders reported that other rallies would continue in the absence of WRGB and may even expand to take its place in the calendar. As a result value related to social capital, volunteering and local communities is likely to remain at a similar level.
- WRGB and national level rallies were described by stakeholders as having a symbiotic relationship. Without the smaller rallies and rally clubs, there would not be a sufficient pool of trained and experienced volunteers to put on WRGB. In the opposite direction, training and experience accrued from involvement with WRGB helps maintain high standards in smaller rallies and at the club level. The related point was made that if there was a wish to ever bring WRGB back in the future, this would only be possible if the network of clubs and national events continues (hence maintaining capacity to host an international event).
- Senior stakeholders in MSUK communicated their commitment to bringing WRGB back in the future and consider that this is a realistic prospect.
- WRGB plays an important role in the current business model for R4W, which in turn is pivotal in the financial viability of all rally events in the WGWE. Some stakeholders thought that consideration would be needed to find a way that R4W could continue if there is a long-term loss of WRGB. This issue could represent an additional risk to the viability of the motorsports in WGWE system that will need to be considered.
- Any future WRGB would require financial investment. It is unclear whether WG would be willing to contribute and to what extent although other funding models may be possible.
- If WRGB does return in future years, then it will obviously be important that it contributes to moving the motorsport in WGWE system towards greater SMNR and this will need to be a key consideration in WG or NRW support.



Figure 6: Summary of key elements of the Motorsports in the WGWE system relevant to SMNR



4. RECOMMENDATIONS FOR AN SMNR REVIEW PROCESS FOR ACTIVITIES OR PROJECTS

Following from the considerations of SMNR and learning from this review, we propose that an SMNR assessment of any system needs to incorporate the following three main elements and meet the requirements listed under them. Further, these elements need to overlap and interweave (e.g. collaborative engagement of multiple system stakeholders will be necessary to help understand and navigate the context which help describe how SMNR can be achieved):

1. **Practice SMNR** – i.e. apply SMNR principles in the process of the review, including, especially:
 - Involve as wide as possible a range of stakeholders from the system under review – to maximise the range of perspectives and evidence about what is important in the system under consideration.
 - Incorporate and enable collaborative and reflective activities – to ensure that conclusions about the system and its potential direction of travel are realistic, grounded in appropriate context, and able to attract a meaningful consensus among system actors.
2. **Consider** the system’s performance (outputs and outcomes) in relation to the **‘space’ of SMNR** – which will be defined by boundaries such as ecosystem functioning and human wellbeing needs; and by appropriate context such as policies and practical considerations. Some of these aspects will be negotiable and others non-negotiable – although the transition of any system towards greater sustainability is ultimately a political navigation as much as one prescribed by scientific understanding or indicators.
 - Take into account multiple impacts on multiple outcomes of interest, some of which cannot be compared and some of which cannot be easily measured at all.
 - Describe the relationship between human activities, natural systems and wellbeing.
 - Flag aspects that are non-substitutable or negotiable and which relate to important system boundaries (e.g. biodiversity and aspects of the system that might impinge on limits of ecosystem functioning). Assess any aspects of the system that might impinge on boundaries.
 - Consider potential for net environmental gain.
 - Consider the question of alignment with SMNR at a range of scales and levels, including:
 - How the system in question interacts with other systems relevant to SMNR?
 - What aspects of the system can be judged at the level of the system itself (e.g. the impact of rally events on forest ecosystems) and which might be more appropriately considered at another level (e.g. carbon impacts from recreational travel to view rally events – which potentially sit more appropriately in a wider consideration of sustainable travel)?
 - How might the system relate to the transformational changes required to achieve SMNR at a national level?
 - Use appropriate contextual information that helps understand the space within which a specific system can operate in line with SMNR; and how it might get there. This will include:
 - Targets, policies and principles, describing limits and necessary approaches identified in policy.
 - Other frameworks that help describe the ‘safe or optimal operating space’, like the 4 aims of SMNR.
 - Practical considerations such as how current systems operate; what changes are realistic; how economic systems and wellbeing can be maintained alongside transition to more fundamentally sustainability; what actions are and are not within the sphere of influence of system actors.

3. **Consider the dynamic nature of the system** under review and its interaction with the dynamic concept that is SMNR. Including: what changes might bring the system more in line with SMNR; the potential for change; and how change might practically be achieved.
- Provide insight into the system itself as a way of judging its capacity to change and achieve greater SMNR, including: the extent to which actors in the system are linked and collaborate; the capacity within the system to identify and enact necessary changes (system resilience and ability to learn); and the direction of any change in practices being enacted within the system.
 - Consider the system's alignment with SMNR now and any evidence about potential changes in this alignment.
 - Consider options for action to achieve greater alignment with SMNR, and any insight about how it the system might bridge from current practice towards SMNR.

4.1 OBSERVATIONS AND LEARNING FOR CONDUCTING AND INTEGRATING SMNR REVIEWS AND PRACTICE

- It became apparent that the process of conducting the review itself can contribute to moving practice within a system further towards SMNR. A participative, deliberative research process embodies many SMNR principles and as a result conducting a review in this way itself helps move practice towards greater SMNR. For example:
 - The use of the value framework and the collaborative workshops helped participants collectively reflect on and learn about the system they are part of (integrating multiple perspectives and expertises). It also led participants to collectively identify areas for change in the system and start to discuss and explore desirable changes and how they might be achieved.
 - Assessing a system in relation to SMNR can bring to attention aspects that need work to prevent harm – in the case of this review, the need for more formal environmental impact assessment and mitigation processes was identified and participants have already started work to develop these.



Since it is important to identify and take into account as full as possible a range of different types of value in a system (covering: the different aspects represented by the 4 Measures/ Aims; including system structure and capacity as well as outputs and outcomes; and drawing on the perspectives, interests and understandings of as many different system stakeholders as possible), the issue of data and evidence can be difficult to manage and needs some consideration. Issues arising can include:

- The volume of data and evidence that seems relevant to a review can be large and this needs careful management. It is necessary to collect enough evidence and data to make the conclusions robust, however it is also important that the amount collected remains realistic within the time and resource constraints. This balance will need attention and further refinement. Our review used the process of prioritisation of value by system stakeholders to identify the most important aspects of value. We then focused our resources on collecting data and evidence relating to these priority aspects of value (key indicators of value in the system). However, even this required a possibly disproportionate

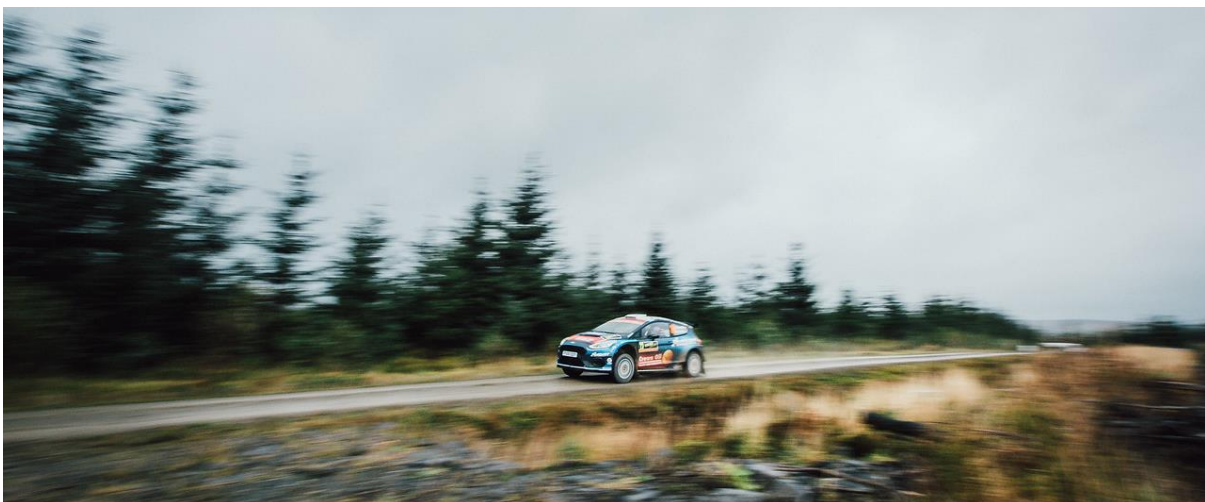
amount of time. One further refinement worth exploring could be to conduct an explicit exercise with stakeholders engaged in an SMNR review to further consider the question of data or evidence in relation to those aspects of the system they have identified of being of most value. It may be helpful to conduct an exercise earlier in the process in which stakeholders help decide: which out of the priority types of value could be used as key indicators; what data exists in relation to each; what resource the review has to collect data and evidence and how this could best be apportioned. It will remain important to ensure that this does not lead to the exclusion of any important dimension of value (e.g. it should not lead to a focus on easily available quantitative data to the neglect of important qualitative or relational aspects of the system), but with this explicit stipulation, may help to focus finite resources.

- As noted above, many aspects of value important in a system (and considered important by system stakeholders) are not commonly measured – or not possible to measure - and so there will always be gaps in data. This challenge must not lead to a situation where important aspects of value are not considered important or taken into account in a review (e.g. system structure and resilience is of foundational importance in producing important outputs and outcomes and so must not be left out of assessments). It will therefore be necessary to make use of different types of evidence – viewed from the different perspectives of different stakeholders- as part of the important move that SMNR has introduced to avoid reduction of complex systems to single measures. Our review has demonstrated how this is possible and this aspect of the approach will need further exploration and development.
- In addition to utilising different types of evidence from different viewpoints, it is necessary to acknowledge that evidence alone is not enough to make decisions about SMNR and system direction. No amount of evidence or data can determine the best way to proceed in a complex system; they can only inform the necessary exploration, learning and negotiation among multiple stakeholders. Hence it is essential to make use of process as well as measurement in reviewing alignment of a system with SMNR.



- Questions about the relative power and voice of different stakeholders were raised by stakeholders involved in the review process and then discussed by the project team, NRW staff and the review Critical Friend. Some key issues to consider include:
 - The need to ensure that as wide a range of system stakeholders as possible are engaged with the review process, including those with opposing views about the system.
 - Stakeholders should be afforded an equal voice in contributing evidence about different types of value in the system and their experience of the system; and should feel free to express their views openly.

- It will be important to recognise and differentiate the different types of evidence and perspectives that different stakeholders will bring. The current SMNR review is designed to elicit detailed insight into a system, drawing on knowledge of system stakeholders. Engaging more non-expert citizens will likely bring a much broader and shallower perspective and may provide evidence about wider perceptions of a system and its place in relation to other systems. As we have discussed, the relationship of a system to other systems (at various scales and levels) is an important part of the context in understanding movement towards SMNR. However, thought will also need to be given to how perceptions can be balanced with factual knowledge of the system and its impacts. Different perspectives can contribute different types of relevant evidence but it will be important to be clear about what different perspectives contribute and how evidence from each can be balanced. Using the concept of value as an accessible, multi-dimensional platform around which different stakeholders can collaborate to understand and negotiate about what matters, may facilitate this process. The methods used will also be important. For example, some form of participative and deliberative approach is likely to provide more meaningful insight into a system and its potential to align with SMNR, than a method such as consultation. The former allows engagement of a wide range of stakeholders (including non-expert citizens), while building collective understanding about a system. Consultation alone provides a very wide and shallow view (although expert voices will also be included), with no opportunity to explore perceptions and assumptions and collectively build deeper insight.
- Engagement in an SMNR review and in work to move a system towards greater SMNR will reflect the real-world context within which the system is operating. Some stakeholders will have a greater interest in a system than others and so are likely to engage more easily and deeply. Also, the reality of unequal power is part of the system and so cannot be removed from the process of understanding the system or making progress within it. In the example of motorsports in the WGWE, WG own the woodlands and NRW manage them. Activities within the woodlands will therefore need to conform to WG and NRW policies and these stakeholders will have more power in deciding how the system changes than other stakeholders. However, this power is far from absolute and NRW cannot determine the future direction of motorsports in WG woodlands unilaterally. Real world constraints exist, such as the financial model for motorsport activities and the fact that other stakeholders are involved in governing and running events. Progress needs to be made in collaboration even where power is unequal. The participative, deliberative SMNR review framework that we have developed allows a balance to be struck – providing a voice to multiple stakeholders, while allowing the real-world dynamics between different stakeholders to inform the review and be applied to the task of moving the system towards greater SMNR.



An SMNR review of Special Stage Motorsports Rallies in the Welsh Government Woodland Estate (WGWE)

Annexe 1: Summary Analyses to inform review conclusions

Jake Elster Jones

Draft 07/03/21

Analyses to inform the SMNR review of motorsports in the WGWE

We present the following summary analyses that draw on detailed evidence from the review and contribute a range of different ‘views’ of the system, relevant to its alignment with SMNR and potential to achieve greater alignment:

1. A one-page overview.	p. 2
2. A revaluation 6 Box summary of the most important aspects of value agreed by system participants.	p. 3
3. Evidence relevant to the performance of the rallying in WG woodlands system against the 4 measures of SMNR. Including SWOT analysis.	p. 4
4. Assessment of impacts of the system against ecosystem and wellbeing boundaries, judged against existing benchmarks & frameworks and WG policies & targets.	p.7
5. Assessment of potential for achieving net benefit.	p.7
6. Discussion of interaction between the rallying in WGWE system and other systems and levels relevant to SMNR.	p.7
7. Evidence about the ability of the system to change or transform to become more aligned with SMNR (the capacity of the system for change and factors influencing the direction of change), judged by considering: <ul style="list-style-type: none"> • System coherence and capacity: The ‘coherence of the system’ – i.e. the extent of networks, relationships and governance frameworks and how these might influence the ability of different actors within the system to act together; The capacity of the system to act in the face of challenges or requirements for change. • The direction of change in the system. 	p.9
8. Discussion of alignment with SMNR Principles.	p.10

1. A one-page overview

[System Structure and Capacity]

- Large volunteer base
- Extensive capacity
- Strong networks
- Well-developed and effective governance
- Strong history of adaptation and resilience
- Some concern about potential reliance on a small number of key actors to drive or block change



[Outputs & Outcomes]

Ecosystem Resilience

- CO2 emissions contribute to climate change at global level
- Local environmental impacts well managed
- No significant negative impacts at local level

Human Wellbeing

- CO2 emissions contribute to climate change at global level
- CO2 emissions comparable scale to other forestry activities
- Significant +ve contributions to current economy at local and national scales
- Significant +ve contributions to recreational enjoyment, wellbeing and social capital
- Natural resource benefits to audiences potentially otherwise not benefitting from woodlands
- Significant volunteer participation
- Not actively engaged with transition to a regenerative economy



[System Direction]

- Notable consensus among stakeholders within motorsport organisations, NRW and others
- Agreement on key directions, including: Reducing CO2 emissions; Biodiversity net gain; Leading change towards SMNR while engaging others and influencing behaviours.
- Policies and targets in place within NRW, WG and Motorsport organisations
- Top level support in MSUK for working with NRW to achieve greater SMNR
- Difficulty addressing carbon emissions without wider change (emissions significantly driven by travel to and from events)



2. Overview of Priority Value identified by system stakeholders

	Visible: Current /	Invisible: Future /
Quantitative	<ul style="list-style-type: none"> £9,87M Economic impact for Wales (WRGB) 100,000 + visitors (WRGB) 4,016 Volunteer days (WRGB); 5,500 Volunteer days for 5 local rallies £4,540,000 Media value (WRGB) 263.2 miles of forestry road repaired; 1:1.07 ratio used: repaired (R4W, 2017) No sig. records of: toxic spill, pollution, protected spp./ habitat disturbance Net zero CO2 footprint for WRGB in 2008 <5% of carbon emissions from competing cars. Majority of emissions from travel to/from event. Informal estimate: 2460 tonnes CO₂ from fuel use for WRGB 2019; 'Typical one day' local rally estimated: 8% of emissions of WRGB 	<ul style="list-style-type: none"> Full CO2 emissions for rally events Number and distance of car journeys to spectate Tourism visitors (direct/indirect) + distribution in time Economic value beyond tourism and hospitality Motorsport sustainability targets Disruption / displacement of forestry and other activities (e.g. other recreation) Displacement of illegal motorsport activity By 2022 all top world rally cars will be hybrid
Qualitative	<ul style="list-style-type: none"> Benefits for individuals: sense of identity; recreational enjoyment; wellbeing; skills Benefits for communities: social capital; financial income; pride Significant social capital High level showcase for sport – inspiring interest and participation WRGB key component of tourism economy and strategy for Conwy; Extend visitor season - importance for tourism economies regionally International profile and showcase for Wales Perception of Rallying as env. negative & out of place with SMNR; CO₂ Emissions are 'in your face' Events use natural landscape where no other infrastructure (e.g., stadiums) 	<ul style="list-style-type: none"> Importance to rural communities and economy Capacity in car clubs – trained and experienced stewards and other volunteers Well-developed governance processes (environmental; H&S; licensing; organisational) Motor organisations' sustainability commitments WG declared climate emergency + carbon neutral by 2030: Displacing emissions not the answer Other policy context Woodland for Wales Strategy: real social and community benefits; broaden engagement; opportunities and services accessible to all Comparative scale of impacts: Rallying & other activities Local economy & tourism economy
Relational	<ul style="list-style-type: none"> Significant voluntary capacity & collaboration Role in whole forestry management systems Strong networks and relationships, incl. Motor Clubs, MSUK relationships & governance Master Agreement (and other governance) Effective governance of environmental impacts (identification, monitoring, reporting, mitigation) History of adaptation (e.g. R4W; environmental impact management) Record of effective communication and collaboration, key to balancing needs, mitigating impacts, influencing change Inter-relationship between Club Rallying and National scale events: the two are symbiotic 	<ul style="list-style-type: none"> Notable alignment and consensus among many stakeholders <i>Key themes and directions considered important and realistic for change agreed include:</i> <ul style="list-style-type: none"> Reduce CO₂. Achieve biodiversity net gain Capitalise on and maximise positive outcomes (including economic and engagement of a wide and possibly hard-to-reach audience Lead change and bring others with you (e.g. by engaging others, innovating, influencing behaviours). Use governance to drive, deliver and monitor improvement (e.g. using the Master Agreement) Collaboration and communication are key – working together facilitates change Using the SMNR framework to facilitate collaboration and whole system progress (at all levels).

3. Headline assessment against the 4 measures or aims of SMNR

SMNR Aims	Ecosystem Resilience				Human Wellbeing			
	1. Stocks of Natural Resources are safeguarded & enhanced		2. Ecosystems are resilient to expected and unforeseen change <i>- Supporting Services</i>		3. Healthy places for people, protected from environmental risks		4. A Regenerative economy with more efficient use of natural resources	
	1a Extent	1b Condition	2a Connectivity	2b Diversity	3a Regulating Services	3b Cultural Services	4a Provisioning Services	4b Waste
Motorsports in the WGWE	Impacts well managed; No significant impact at local level; CO ₂ emissions impacting at global level				CO ₂ emissions impact on climate change; Primarily associated with travel to and from events and comparable scale to other activities (recreational and harvesting)	Significant contributions to: tourism; recreational enjoyment; wellbeing and social capital (individuals & rural communities)	Significant contribution to local, regional and national economy by conventional measures; Additional contribution above that measured econometrically. Not actively engaged with transition to a regenerative or circular economy.	
Possible Indicators	<ul style="list-style-type: none"> Quarrying of new stone for road repair Habitat damaged Habitat restored / created 		<ul style="list-style-type: none"> Incidents of significant environmental damage / disturbance Governance processes in place to identify, report and mitigate env. damage Habitat restoration / creation / management (net gain) Communication and engagement of volunteers & spectators with sustainability messages and activities 		<ul style="list-style-type: none"> Env. damage incidents Disturbance, noise etc: complaints & processes to manage CO₂ emissions: Broken down to different sources Spectator journeys and mode Links to wider sustainable travel and transport. Progress to Carbon Neutral; Incl. breakdown of how achieved Number of spectators & others receiving recreational enjoyment and other benefits Number of volunteers Relationships between Clubs, National Motorsport organisations (MSUK, Wales Rally Cymru) and NRW 		<ul style="list-style-type: none"> Road used: Road repaired ratio Economic contribution to: National Economy; local economies; forest management systems International coverage for Wales: Broken down for landscape; visitor destination; sustainability Economic contribution broken down by tourism / visitor economy: other contributions Volunteer hours and value Links made to regenerative and circular economy developments at wider scales. 	

3.1 SWOT analysis against the 4 measures / aims

i) Ecosystem Resilience:

a) Stocks of Natural Resource are safeguarded and enhanced

Strengths	<ul style="list-style-type: none"> Negligible Impacts at local scale
Weaknesses	<ul style="list-style-type: none"> Implicated in 'car culture' Resources used in car manufacture CO2 Emissions associated
Opportunities	<ul style="list-style-type: none"> Move to 100% recycled stone use for road repair Potential to engage system volunteers with habitat restoration / creation (e.g. tree planting)
Threats	<ul style="list-style-type: none"> Movement of rallying to other woodlands (e.g. private) where impacts less well managed

b) Ecosystems are resilient to expected and unforeseen change

Strengths	<ul style="list-style-type: none"> Environmental impacts at the local scale are very well managed by NRW experts in positive collaboration with motorsport event organisers Detailed and well-established governance frameworks and processes for identifying and managing impacts
Weaknesses	<ul style="list-style-type: none"> Some impacts may not have been identified and the level of monitoring and reporting will influence what we know about impacts
Opportunities	<ul style="list-style-type: none"> Improve governance frameworks and processes to ensure all environmental impacts identified, monitored and managed; formalise governance Potential to engage system volunteers with habitat restoration / creation (e.g. tree planting) Potential to communicate with and engage spectators and volunteers with sustainability messaging and activities
Threats	<ul style="list-style-type: none"> Movement of rallying to other woodlands (e.g. private) where impacts are harder to manage

ii) Human Wellbeing

a) Healthy places for people, protected from environmental risks

Strengths	<ul style="list-style-type: none"> Significant numbers of people participate in recreational activities and derive enjoyment Specific audience benefitting from woodlands (who may not do so in other ways) Significant levels of camaraderie, positive emotional wellbeing and social capital associated with Motor Clubs and events: for participants and Motor Club members and for rural communities Strong networks and relationships between people and organisations involved
Weaknesses	<ul style="list-style-type: none"> Disturbance and noise which effects people and wildlife CO2 emissions
Opportunities	<ul style="list-style-type: none"> Reduction in CO2 emissions – moving towards carbon neutral or even positive

	<ul style="list-style-type: none"> • Increase numbers of people benefitting from WGWE • Reaching audiences who would not otherwise engage with or benefit from woodlands • Potential to engage rally spectators and volunteers with other woodland activities • Potential to communicate with and engage spectators and volunteers with sustainability messaging and activities • Build NRW relationships and engagement with volunteers and communities not otherwise engaged
Threats	<ul style="list-style-type: none"> • CO2 emissions are predominantly associated with travel to and from events and so require changes in the wider transport system to address them at a fundamental level. • Potential for environmental damage / pollution • Potential for injury or death • Movement of rallying to other woodlands (e.g. private) where impacts are harder to manage

- b) A regenerative economy with more efficient use of natural resources (Our aim is for Wales to use no more than its fair share of global resources in order for our economy to operate within the regenerative capacity of the Earth's ecosystems and make a positive contribution to global wellbeing.)

Strengths	<ul style="list-style-type: none"> • Significant economic value evidenced for Welsh economy and local economies from WRGB • WRGB contributes to international exposure for Welsh landscapes (considered to have a significant positive effect for tourism and the visitor economy) • Significant economic value for local economies evidenced from local rallies (though at different scale) • Economic value through different routes: significantly to the visitor economy; but also motorsport businesses • Net gain in terms of road condition from R4W model (more roads repaired than used and roads often repaired to a higher standard) • Significant voluntary contribution to organising and running rallies
Weaknesses	<ul style="list-style-type: none"> • Significant proportion of economic value associated with WRGB (which has an uncertain future)
Opportunities	<ul style="list-style-type: none"> • Continue to deliver significant economic value • Decouple economic value from carbon emissions • Increase share of economic value to non-tourism aspects of local economies • Build circular economic activity in local economies and within Wales associated with rallying
Threats	<ul style="list-style-type: none"> • Loss of WRGB • Economic value continues to be linked to carbon emissions (mainly through visitor travel) • Tourism economy raises its own sustainability problems

4. Impacts on ecosystem and Wellbeing boundaries

2.1 Judgement against existing benchmarks and frameworks

- NRW Forest Plans are vetted using the UK Forestry Standard (UKFS)¹
- All rounds of the WRC (including WRGB) are required to be accredited against FIA's Environmental Accreditation Programme. By the end of 2021 the FIA aims to have developed environmental action plans covering water, air, soil, waste and biodiversity. It will also develop a training programme for member organisations to build their capacity in taking climate action. By 2025 all FIA members will be required to reach the top level of FIA environmental accreditation. Four of the respondents to our local rally questionnaire confirmed interest in FIA and other environmental programmes (and one was already investigating the possibility of gaining accreditation).
- NRW has existing rigorous processes for environmental assessment, including processes to monitor biosecurity and ecosystem resilience. Some of these are formally built into the management of rallying activities on the WGWE; others are informally followed; and there are plans to increase the formalisation of environmental impact governance processes.

2.2 Judged using WG policies and targets as a proxy indicator:

- WG's declaration of Climate Emergency and targets to achieve carbon neutrality provide a guide to targets and timescales within the rallying in WGWE system.
- WG Woodland for Wales Strategy and Wellbeing Goals: Ensuring all people in Wales benefit from natural resources

5. Net benefit potential

- A local rally organiser suggested that their volunteers may be interested in tree planting or other activities to support biodiversity.
- Senior MWUK representatives discussed the potential to use rallying as a way of leading innovation, for example in different fuel types or electric vehicles (with rallying having a history of innovation and being more flexible than the car manufacturing industry).

6. Interaction with other systems and levels

- The majority of CO₂ emissions from rallying in the WGWE are associated with car travel to and from rally events (by spectators, organisers and competing teams). This brings the activity of rallying into a similar space as other outdoor recreation or events and means that significant reductions need to be thought of as part of action to address emissions from transport more generally.
 - The rallying in WG woodlands system has the potential to contribute positively to this wider system transformation, via for example: technological innovation led by rally teams; Engagement of public audience with behaviour change.
 - Progress on sustainable transport at the Wales or UK levels will make a positive contribution to addressing carbon emissions within the rallying system.
- The rallying in WG woodlands system has significant economic impacts on local, regional and even national economic systems. These include: impacts on tourism and hospitality sectors, directly and indirectly; impacts on welsh motor businesses; contributions to forestry systems; income for community groups and organisations. In terms of transition to more regenerative and circular economies, the following interactions and links may be worth considering:
 - While forest rallying events and especially WRGB make a significant contribution to tourism and hospitality sectors, it was noted by some review participants that these sectors themselves are not necessarily highly sustainable or regenerative. The SMNR review process

¹ (Elster-Jones, 2021b)

led to consideration of the wider question of what a sustainable local economy might look like, beyond the immediate consideration of how rallying contributes to existing local economies.

- Links to the motor business sector raise similar questions about the tension between currently important economies and what more sustainable / regenerative economies might look like.
- In relation to the examples of tourism and motor businesses, movement of the rallying in WGWE system towards greater alignment with SMNR, clearly overlaps with transitions of local, regional and national economies to more sustainable or regenerative models. Any opportunities for the rallying in WG woodlands system to contribute to economic transition should be considered and pursued.
- It is notable that the different types of value produced by the rallying in WG woodlands system (including economic value) is significantly based on voluntary effort and social capital. The fact that the system is based on voluntary and not-for-profit models (from the operation of Motor Clubs, via local rally events, to Rally 4 Wales) suggests that it may be suited to greater alignment with more circular or regenerative economic systems; and may even provide a model that other recreational uses of woodlands and forestry could learn from?
- One review interviewee described how rallying can play a part in a more sustainable forestry system. In this case, income from testing helped finance repair and creation of access roads that allowed more sustainable timber extraction.
- Rallying can be thought of as one of several different recreational forestry or woodland uses and as such is part of this bigger system (and can relate to other forestry recreation sub-systems).
 - As above, the issue of carbon emissions associated with travel for recreation, needs addressing by the whole recreation sector and rallying can contribute to, learn from and benefit from activities elsewhere in the larger system.
 - A number of governance systems have been especially well developed by the rallying system, such as the management of local environmental impacts and health and safety risks. Learning from the rallying system could usefully inform and be shared with other recreational woodland / forestry use systems (e.g. mountain biking).
- Broadening engagement with the natural world is an objective in the WG Woodland for Wales strategy as well as being important in helping drive wider system and behaviour change towards sustainability. Stakeholders involved in the review suggested that rallying is an activity that brings people into woodlands who might not otherwise derive benefits from them. This link means that rallying could be a route by which a wider audience of people derive benefits from natural resources. It also links the rallying system and the wider goal of engaging more people with natural systems and sustainability, the potential of which could be further explored.
- Comparison of the rallying in WGWE system with other relevant activities or systems can help put the impacts of the system in context, for example:
 - Key areas of comparison suggested by review participants included: with other woodland / forest recreational activities; with other major sporting events; comparison of carbon emissions from spectator travel with emissions for travel to other recreational activities; timescale of impacts (concentrated over a few days for rallying versus lower numbers spread out over a whole year for other recreational or harvesting activities).
 - Our review was not able to collect detailed data to allow such comparisons. Some comparative data is presented in the detailed evidence section of this report but is not rigorous enough to draw firm conclusions. However, it seems reasonable to conclude that, e.g.:
 - Carbon emissions associated with rallying are likely to be of a comparable scale with those from other forest uses, such as mountain biking or timber harvesting, based on the fact that the majority of emissions are associated with spectator travel to and from

rally events (and other recreational woodland users also travel to and from their activities by car; and forestry involves a significant amount of vehicle mileage).

7. Capacity for change

7.1 System coherence and capacity:

- **System 'coherence'**: The rallying in WG woodlands system has well developed networks, relationships and governance frameworks that facilitate communication, collaboration and co-ordination between the different actors in the system. These relationships are summarised in Figure 4 in Annexe 2.
- **System capacity and resilience**: The rallying in WG woodlands system has significant capacity for co-ordinated action and has demonstrated past resilience:
 - The system's capacity emerges from: the significant numbers of people involved in Motor Clubs as volunteers and members; their shared interest and passion for rallying; the knowledge and skills that they hold (e.g. as trained and accredited marshals); the networks relationships and co-governance structures between Clubs, governing bodies and other organisations involved in the system.
 - The system's capacity is demonstrated in the staging of rally events that require very significant voluntary effort, which is very closely and professionally managed and co-ordinated and which complies with stringent health and safety and other requirements (including close management of various environmental impacts and repair of roads following rallies).
 - There is good evidence of the system's past success in adapting to challenges and changes, including: the emergence of Rally 4 Wales as a non-profit solution to challenges around the cost of road repair; responses to health and safety challenges and needs over time; reported evolution of how rally organisers work with NRW staff to address, reduce and mitigate environmental impacts.

7.2 Direction of change in the system: In addition to the system's capacity to change and adapt, it is important to consider evidence about the potential or likely direction of change in the system. Relevant evidence collected by the review includes:

- WG, NRW and Rally organisation's policies, goals and targets, including:
 - 2022 target for all top WRC cars to be hybrid.
 - 2025 target for all FIA members to reach the top level of FIA's Environmental Accreditation Programme.
 - WG declared climate emergency and has committed to achieving carbon neutrality by 2030.
 - SMNR as part of the Environment (Wales) Act
 - Woodland for Wales Strategy, with aims including real social and community benefits from woodlands, broadening engagement with woodlands and ensuring benefits from woodlands are accessible to all.
- Notable consensus and agreement among stakeholders engaged by the review (within Motorsports organisations, NRW and others) about the directions that the rallying in WG woodlands system needs to (and can realistically) take, which include: reduce climate impact, achieve biodiversity net gain and lead change while engaging stakeholders and influencing behaviours.
- Top level support within MSUK for working with NRW to make the rallying in WGWE system a leader in sustainability.
- A small number of stakeholders expressed concern about potential weaknesses in the governance structures within motorsports in relation to facilitating adaptation (e.g. governance can be quite centralised and so certain actors are key in enacting or blocking change).

8. Alignment with SMNR Principles

The SMNR Principles are designed to result in practice that will take a system towards greater alignment with SMNR and help meet Wellbeing Goals. The following Table illustrates how the Principles relate to the Rallying in the WGWE system.

SMNR Principle	Relationship to / application in the Rallying in WGWE system
1. Manage adaptively	<ul style="list-style-type: none"> • Rallying in WGWE system is responsive to change and has demonstrated ongoing ability to identify important issues and adapt. • Well-developed governance frameworks and processes support learning and adaptation (e.g. regular review and amendment of the Master Agreement).
2. Consider the appropriate spatial scale for action	<ul style="list-style-type: none"> • Impacts from the Rallying in WGWE system are relevant at multiple scales, from the local through national (economic and Wales' profile) to international (climate change). • Management of local environmental impacts is appropriately managed at the local scale using NRW and rally frameworks and processes, with appropriate levels of collaboration. • Some aspects of carbon emissions can be managed at the scale of the rallies, in particular emissions by competing cars and their support teams. However the more significant proportion of emissions (from travel by spectators, competitors and organisers to and from events) is harder to act on at the scale of the rally system and involves action at the wider levels of sustainable transport (and specifically sustainable transport for woodland recreation). Having said this, action within the rallying system can potentially contribute to progress at these larger scales, including through technological innovation (that may help transition in the wider automotive sector) and via engagement of rallying fans with sustainability messages and actions.
3. Promote and engage in collaboration and co-operation	<ul style="list-style-type: none"> • Collaboration and co-operation are well developed within the rallying in WGWE system and this existing capacity offers the potential for stakeholders to collaborate further, including: in moving the rallying in WGWE system further towards SMNR; and engaging the wide audience of rally enthusiasts with positive woodland management. • Several stakeholders involved in the review suggested that NRW could more effectively influence the rallying in WGWE system if they remain as part of the system and that there were risks of poorer outcomes in relation to SMNR if rally events were to continue without close involvement of NRW (e.g. on private land).
4. Make appropriate arrangement for public participation in decision-making	<ul style="list-style-type: none"> • There are currently no clear links here. Engaging more people in decision making about the use of the WGWE may be appropriate and may have implications for the rallying system – e.g. as a way of

	<p>accessing a wider audience of people to participate; and as a way of judging how important the use of woodlands for rally events might be considered by the public.</p>
5. Take account of all relevant evidence and gather evidence in respect of uncertainties	<ul style="list-style-type: none"> This review has gathered a wide range of different types of evidence about value (positive and negative) in the rallying in WGWE system.
6. Take account of benefits and intrinsic value of natural resources and ecosystems	<ul style="list-style-type: none"> This review, and the practice of rallying in the WGWE, provides evidence of benefits to people from natural resources (in ways that may not have intuitively been apparent to those without detailed understanding of the system).
7. Take account of the short, medium and long-term consequences of actions	<ul style="list-style-type: none"> Much governance in the rallying in WGWE system appears to be mostly focused on short- or medium-term consequences, geared towards addressing within system impacts such as local environmental or financial issues. A longer timeframe has been introduced via motorsport organisation sustainability policies and the policies that have led to this review within NRW. This review has widened the horizon of consideration and helped stakeholders engaged in the system think more about needs for longer-term change in the system; and ways in which the rallying system interacts with even longer-term transitions such as those around sustainable transport and tackling climate emergency.
8. Take action to prevent serious damage to ecosystems	<ul style="list-style-type: none"> The majority of threats to ecosystems from rallying are at a local scale and are well managed in line with a preventative approach, due significantly to NRW's expertise and internal focus (but also motorsport's well-developed governance which has been led by the need to avoid serious accidents). The main impact that impinges on ecosystem boundaries of functioning is that of carbon emissions. The scale of emissions is not likely to be very significant in the context of e.g. other recreational activities in woodlands or harvesting activities. However in the context of climate emergency all emissions are significant and need addressing. There is acknowledgement from most stakeholders engaged with this review that reducing carbon emissions needs to be achieved by the rallying in WGWE system.
9. Take account of the resilience of ecosystems, in particular the following aspects: <ol style="list-style-type: none"> Diversity between and within ecosystems The connections between and within ecosystems The scale of ecosystems The condition of ecosystems The adaptability of ecosystems 	<ul style="list-style-type: none"> These issues are addressed well by environmental impact management within the rallying in WGWE system (as discussed above). The issue of carbon emissions contributing to climate change needs addressing and there is consensus among stakeholders that this will be necessary (as above).

An SMNR review of Special Stage Motorsports Rallies in the Welsh Government Woodland Estate (WGWE)

Annexe 2: Review Results

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Results

This Annex presents the summarised and detailed results collected during the review.

Evidence collected

The following table indicates the types of evidence that we collected during the different review activities:

Review activity	Type of evidence collected
Stakeholder Interviews	<ul style="list-style-type: none"> • System overview and operation • Detail about the range of impacts and value in the system
Workshop 1	<ul style="list-style-type: none"> • Priority value in the system • System links and operation • Aspirations and potential system directions
Workshop 2	<ul style="list-style-type: none"> • Priority value in the system • System links and operation • Potential changes to value related to different system changes • System links, coherence and direction • Aspirations and perspectives of different stakeholder groups

Results presented

We present the following results below:

Part 1: The range of impacts and value in the rallying in WG woodlands system

1.1 The range of types of impact and value in the rallying in WG woodlands system [p.2]

1.2 Summarising value in the system using the Revaluation framework [p. 6]

1.3 Prioritisation of value by system stakeholders [p.10]

Part 2: Detailed evidence and data for types of value identified as a priority by system stakeholders

2.1 Introduction and summary [p.12]

2.2 Detailed evidence and data [p.20]

Part 3: Workshop reports

3.1 Workshop 1: NRW stakeholders [p.52]

3.2 Workshop 2: Multi-stakeholder workshop [p.62]

Part 4: Description of the Motorsports in the WGWE system [p.72]

Part 1: The range of impacts and value in the rallying in WG woodlands system

1.1 The range of types of impact and value in the rallying in WG woodlands system

We analysed the written notes from stakeholder interviews to identify points made with relevance to different types of value (impacts or other aspects of importance) within the rallying in WG woodlands system. The raw data from this exercise was compiled in a spreadsheet with approximately 470 rows of data (this is not a final figure as we carried out additional interviews and gathered other evidence about impacts and value after the spreadsheet was compiled). This data was then analysed thematically to identify types of value that system stakeholders reported as important in relation to the rallying in WG woodlands system. The following list shows the broad range of types of value reported by the interviewees:

- Economic impacts
- Education & Engagement
- Environmental impacts - wider
- Environmental Impacts - local
- Impacts on other forest uses: positive and negative
- Recreational use of WG woodlands
- Sustaining gravel rallying as a sport
- Reducing illegal motorsport activity
- Amateur sports participation
- Volunteering
- Collaboration
- Social Capital
- Adaptability (resilience)
- Perceptions of Rallying
- Frameworks & Processes
- Direction
- Context and comparisons

It can be seen that the aspects of value (importance) that interviewees reported include a wide range of tangible and less tangible elements such as:

- Outputs and outcomes (such as economic value for regional hospitality businesses).
- Aspects of the system that relate to capacity for change (such as social capital, collaboration and examples of system adaptability)
- Frameworks and processes that relate to system organisation and operation (e.g. agreements between different system stakeholders, policies, principles and ways of working)
- Factors that influence the direction of the system (e.g. goals and targets; innovations)
- Also contextual factors such as how the system compares to other activities (e.g. other major sporting events or other recreational activities in woodlands). These are considered important as they provide comparison to help judge system sustainability.

Table 1 below provides a more detailed summary of this evidence.

Table 1: Value associated with the rallying in WG woodlands system: Summary of types of impact and other important aspects reported by review participants

Broad type of outcome / system aspect	Outcome reported	Example / comment
Economic impacts	NRW forestry system	Contribution to net road improvement
	Private landowners	Testing income as a component of a sustainable forestry system
	Local community groups & charities	Receive share of car parking income
	Local hospitality and tourism businesses	Direct & Indirect (repeat visits, new visitors)
	National hospitality and tourism businesses	From increased media coverage and international profile for Wales
	Other income to local economy	Including spend in local shops and fuel retailers; and at printers (for signage, programmes, etc)
	Motor businesses	E.g. Cars, parts, servicing; Both domestic spend and export business
	Jobs	Direct employment (e.g. R4W); Contribution to hospitality and motor business jobs
	Media value	Significant coverage (national and international); Value of international profile for Welsh landscapes
	Technological benefits for motor industry	Innovations made in rally cars
	Links to Welsh automotive industry and engineering expertise	
	Automotive industry (corporations)	Marketing benefits from participation and success in rallying events
	Sponsorship Return on Investment	Positive return on investment from Welsh Government and local government sponsorship
Education & Engagement	Links to STEM teaching and engagement	Educational visits and promotion, including engaging girls with STEM subjects
	Capacity building and training for individuals	Learning new skills, e.g. around stewarding or organising events
	Learning about forests and forestry	Volunteers involved in organising and running rallies
	Potential to engage wide audience with sustainability	Large number of volunteers and spectators
Environmental impacts – wider	CO2 emissions: various sources	Competing cars; spectator journeys; quarrying for road repair
	Re-use of tyres and other motor components (cars etc)	A central practice in motorsports
Environmental Impacts - local	Forestry roads	Damage from competing cars; Repair following rallies

	Toxic spills, incl. fire pollution	From damaged competing cars
	Biosecurity	Potential for movement of plant matter between sites
	Species and habitats	Potential for disturbance or damage
	Water pollution	From competing cars driving through water courses and disturbing sediment or depositing pollutants
	Litter	From spectators
	Noise	Competing cars and spectators
	Traffic	Spectator traffic
	Historic monument impacts	
Impacts on other forest uses: positive and negative	Forestry operations	Required to suspend during rallies
	Other recreational uses	Unable to use forest during rallies; Noise and disturbance
	Residents and local communities	Noise, disturbance, litter; Road improvements
Recreational use of WG woodlands	Spectators, competitors and volunteers involved in motorsports	
	Extending use and engagement to a wider / hard to reach audience	
	Contact with / exposure to natural spaces	For those watching, helping organise or taking part in motorsports; Direct and indirect via televised events
Sustaining gravel rallying as a sport	High level showcase	
	Recruiting competitors	
	Recruiting spectators	
	Training and race experience	
	Motor Club sustainability	Income from large rallies supports other activities
	Expertise and capacity in Motor Clubs	Volunteers trained during larger events - e.g. marshalling, H&S and other rally organisation and governance
Reducing illegal motorsport activity		This was a suggestion from some stakeholders but is questioned by others
Amateur sports participation		
Volunteering		Motor Clubs and Rally organisation and stewarding
Collaboration		Within Motor Clubs; between Clubs and other motor sports organisations; between NRW and motorsport organisations; Between Clubs and local communities
Social Capital*	Within Motor Clubs	
	Within whole Rally system (Motor Clubs, MSUK, R4W, NRW, etc)	

Adaptability (resilience)	R4W	
	Changes to road repair materials	
	Changes to cars and parts (tyres, mud guards, windscreens)	
	Changes to route allocation process	
	Response to H&S issues	
	Mitigation of environmental impacts	
Perceptions of Rallying		Currently perceived as fossil fuel based and possibly dirty and noisy
Frameworks & Processes	Master Agreement	
	NRW Environmental Assessment	Largely based on officer experience and expertise; Potential to formalise (and design for net improvement?)
	Rally governance and management	H&S mitigation
		Route allocation
		Administration and competition
		Fuel supply
	Road maintenance process	R4W model; Integrated with route allocation for increased efficiency; Leading on repair specification development
	Principles and ways of working	SMNR Principles
		WFG Act Sustainability Principle and Ways of Working
		Collaboration and voluntarism as historical and ongoing basis for rallying
Direction	Sponsorship (including allocation and assessment processes)	WG
		Local Authority
		Via NRW in kind?
	Legislation	Environment Act
		Underpinning EIA
	Policies	SMNR
		NRW policies
		WG strategic direction for WE
		WG National Forest
		FIA and MSUK Sustainability policies
	Targets and Goals	Wellbeing Goals
		Decarbonisation
		Target for hybrid vehicles in rally events
	Innovations	Electric car rally events
Context and comparisons		Comparable sporting events; Travel and emissions from other woodland users

*Social Capital can be defined as: 'the links, shared values and understandings ... that enable individuals and groups to trust each other and so work together'. OECD (2007: 102). Human Capital. OECD Insights. OECD.

1.2 Summarising value in the system using the Revaluation framework

In addition to this summary, we made use of an existing framework that has been developed to help stakeholders work together to understand and increase value in complex systems. This provides a practical way of presenting and working with information about the many different types of value in a complex system. The Revaluation framework that we made use of is described in more detail in Annex 3: Detailed Methods. In summary, the framework uses 6 Boxes to organise and present evidence about different important aspects of value in any complex system, as follows:

Figure 1: summarising value in a complex system using the Revaluation 6 Box framework

	VISIBLE	INVISIBLE
CALCULATE	<p>Quantitative Value: direct & on the surface What we have quantitative evidence for</p>	<p>Hidden Quantitative Value Inc. future value & proxy calcs What we might get quantitative evidence for; What might emerge in the future; What might drive change (specific targets)</p>
CALIBRATE	<p>Reported Benefits: qualitative outcomes</p>	<p>Underlying learnings, structures and processes (incl. assumptions, theories of change, policies)</p>
CAPACITATE	<p>Networks & Relationships: of People and of Ideas</p>	<p>Transformations & Trajectories Direction of travel Where the system might go Emergent properties (new ways of working, ideas seeded)</p>

We took the evidence provided by interviewees and recorded in the spreadsheet and used it to produce a Revaluation 6 box representation of a full range of the value reported by stakeholders in the rallying in WG woodlands system. Figure 2 below provides a summary selection of the types of value presented in the full 6 Box table (a non-systematic sample chosen to illustrate this approach to presenting the types of value we had recoded in). This method of representing value in a system:

- Makes it clear that multiple aspects of the system are important at the same time and that value cannot be collapsed into a single measure or type of value.
- Emphasises the importance of different aspects of value, especially relational value alongside the more usually considered quantitative and qualitative value. Relational value (networks and relationships) is an essential dimension in any complex system. It is the relationships and networks that often represent the basis for production of

the other types of value in the system, from resilience to the more immediate outputs and outcomes.

- Makes explicit the time dimension of value and the fact that often much value is hidden from immediate knowledge. Systems are as important for the value they will produce in the future as that which they produce now. Some aspects of value are harder to see or reveal, for example the wellbeing or educational impacts of a recreational activity, the effects that one system has on another or aspects that require some investigation or calculation to perceive (such as carbon emissions associated with an activity like rallying).
- Helps us think about the system as a whole. The explicit dimensions of relational value and the dynamics of value over time contribute to this; as does the fact that the framework requires us to think about the forward implications of relational value – the trajectories or transformations that are plausible as a result of what we know about the system. Thus, the bottom right box includes projections about plausible changes based on evidence about value in the system, such as relationships, current outputs and outcomes, governance systems, policies, principles, targets, current innovations and plans (shown in italics in the example below). For example, the ‘Ability to respond to changes and challenges by mobilising voluntary capacity and networks’ is a likely future behaviour of the rallying in WG woodlands system, based on what we know about voluntary capacity, strong networks and past adaptation to challenges by actors working together in the system. Projected future possibilities like *‘Carbon and ecology neutral (or positive) rallying’* are not certain but are also not abstract aspirations, as evidenced by the following knowledge about the system:
 - The rallies currently have low impacts on woodland ecology and these are well mitigated.
 - One rally organiser suggested that Motor Club volunteers may be willing to plant trees if this helped secure the future of their sport in the woodlands.
 - The largest rally has achieved carbon neutral accreditation in the past.
 - There is clear realisation among all stakeholders in the system that the carbon emissions of the events must be reduced going forwards
 - Innovations such as the introduction of hybrid or electric vehicles are already taking place.

Figure 2: Summary extract of full Revaluation 6 Box presentation of system value

	VISIBLE	INVISIBLE
CALCULATE	<ul style="list-style-type: none"> • £9,87M Economic impact for Wales (WRGB)¹ • 100,000 + visitors (WRGB)¹ • 400-800 spectators: Cambrian Rally • £266,569 raised for local charities over 7 years (WRGB)¹ • 4,016 Volunteer days (WRGB)¹ • 32,530,000 UK Media Coverage – reach / impressions (WRGB)¹ • £4,540,000 Media value (WRGB)¹ • 263.2 miles of forestry road graded and compacted (R4W, 2017) • Zero records of significant disturbance to protected species or habitats • No significant toxic spill or pollution incident in 35 years' experience • Net zero carbon footprint confirmed for WRGB in 2008 • 5% Carbon Emissions from WRGB are from rally cars; majority of emissions from spectators' & officials' travel. • £15,000/yr. income for a private forestry operator from testing income (Supports a sustainable forestry system) • Approx. 140 cars compete per rally • Harlech & District Motor Club – Approx. 250 members • Public sector investment (Welsh Government £800k 2017-19) (Conwy BC £90k – 130k p.a.) • >80 Wales-based Motorsport Companies & Organisations 	<ul style="list-style-type: none"> • CO2 emissions – competitors; spectators; whole event; road repair (incl. quarrying) • Tourism visitors (from raised profile etc) – including distribution in time (out of season tourist visits) • Number and distance of car journeys to spectate • Volunteer hours £ value – all rally events • R&D benefit for motor industry and consumers • Viability of car club activities overall • WG carbon emission targets • Motorsport sustainability targets • £ spent in Welsh motor businesses • Disruption / displacement of forestry operations • Disruption / displacement other activities (recreation) • Repeat visits (non-rally, but rally 'inspired') • £ spent in local hospitality businesses • £ income to other businesses (printing etc) • Jobs created or supported • Number of visitors spending time in woodlands • £ raised for local charities / organisations –all rally events • Young drivers and fans recruited • 2022 – all top world rally cars will be hybrid (this will be in the rules) – will start to trickle down • Number of car club members • Number of changes to start etc to mitigate nature disturbance
CALIBRATE	<ul style="list-style-type: none"> • Camaraderie • Participation in event (voluntary effort) • Recreational enjoyment • Learning new skills • Training and race experience (drivers and teams) • High level showcase for sport – inspiring interest • WRGB Considered a key component of tourism economy and strategy for Conwy • Rallies (esp. WRGB) help extend visitor season • Perception of Rallying as environmentally negative • Road safety education and communication 	<ul style="list-style-type: none"> • Capacity in car clubs – trained stewards and volunteers • Governance processes (e.g. environmental; H&S) • Significant social capital – volunteers, relationships • SMNR principles • Conwy Council tourism and economic strategies • Showcases national landscape of Wales internationally • FIA: sustainability as a mandatory requirement • WG declared climate emergency; carbon neutral by 2030 • Green recovery • Woodland for Wales Strategy: Real social and community benefits; Broaden engagement with woodlands; Benefits to all sections of society, equitably
CAPACITATE	<ul style="list-style-type: none"> • Voluntary capacity & collaboration in and between clubs • Role in whole forestry management systems • Networks and relationships (incl. MSUK and Motor Clubs) • Master Agreement • History of adaptation (e.g. R4W) • R4W agreements with NRW, MSUK and Motor Clubs 	<ul style="list-style-type: none"> • Ability to respond to changes and challenges by mobilising voluntary capacity and networks • <i>A sustainable business model for WGWE</i> • <i>A sustainable sport bringing wider audience into woodlands</i> • <i>Carbon and ecology neutral (or positive) rallying</i> • <i>WRGB leading on sustainability in the WRC</i> • <i>A smaller group of rallies with no WRGB – Net positive environmental and community impacts</i> • <i>SMNR as a process for reflection, learning and change, enabling whole system progress</i> • <i>Change in perception: from dirty old fashioned to positive, forward thinking</i>

1.3 Prioritisation of value by system stakeholders: identifying key measures for SMNR in the Rallying in WG woodlands system

During the NRW workshop we asked stakeholders to prioritise the full range of types of value that we had identified through the interviews. The participants worked through the types of value guided by the 6 Box framework, which resulted in a selection of key aspects of value being collectively agreed. This selection of priority value was then used as an input for the final multi-stakeholder workshop where we asked participants to consider the priorities chosen by NRW stakeholders and to confirm whether they agreed with them as priorities and whether there were any types of value that they thought were missing from the priority list, or that should be emphasised from within it. The results of these processes are shown in Figure 3 below as a 6 Box presentation of priority value in the rallying in WG woodlands system agreed by stakeholders from NRW, motorsport organisations, Welsh Government and Conwy Local Authority (and one member of a local community affected by rallying – though not acting in a representative role). Full results from both workshops have been written up and are available as reports presented below.

Figure 3: Priority Value identified by stakeholders during 2 Workshops

	Visible: Current /	Invisible: Future /
Quantitative	<ul style="list-style-type: none"> £9,87M Economic impact for Wales (WRGB) 100,000 + visitors (WRGB) 4,016 Volunteer days (WRGB) £4,540,000 Media value (WRGB) 263.2 miles of forestry road repaired; 1:1.07 ratio used: repaired (R4W, 2017) No sig. records of: toxic spill, pollution, protected spp./ habitat disturbance Net zero carbon footprint confirmed for WRGB in 2008 	<ul style="list-style-type: none"> CO2 emissions – competitors; spectators; whole event; road repair (incl. quarrying) Number and distance of car journeys to spectate Tourism visitors (direct/indirect) + distribution in time Economic value beyond tourism and hospitality Motorsport sustainability targets Disruption / displacement of forestry and other activities (e.g. other recreation) Displacing illegal motorsport activity(?) By 2022 all top world rally cars will be hybrid – will start to trickle down
Qualitative	<ul style="list-style-type: none"> Participation in event; sense of identity; recreational enjoyment Significant social capital – volunteers, relationships High level showcase for sport – inspiring interest and participation WRGB key component of tourism economy and strategy for Conwy (hospitality a sig. proportion of economy); Rallies (esp. WRGB) extend visitor season - importance for tourism economies regionally International profile and showcase for Wales: landscape Plus Perception of Rallying as env. negative & out of place with SMNR; CO₂ Emissions are ‘in your face’ Events need to use natural landscape where no other infrastructure (e.g., stadiums) 	<ul style="list-style-type: none"> Importance to rural communities and economy Capacity in car clubs – trained and experienced stewards and other volunteers Governance processes (environmental; H&S; licensing; organisational) WRGB & other motor organisations’ sustainability goals and commitments WG declared climate emergency + commitment to carbon neutral by 2030: Displacing emissions not the answer Woodland for Wales Strategy: real social and community benefits; broaden engagement with woodlands; opportunities and services accessible to all Comparative scale of impacts: Rallying & other activities Local economy & tourism economy
Relational	<ul style="list-style-type: none"> Voluntary capacity & collaboration in clubs and between clubs Role in whole forestry management systems (NRW and private) Networks and relationships, incl. Motor Clubs, MSUK relationships & governance Master Agreement Governance of environmental impacts (identification, monitoring, reporting, mitigation) History of adaptation (e.g. R4W; environmental impact management) Effective communications and collaboration key to balancing needs, mitigating impacts, influencing change Inter-relationship between Club Rallying and National scale events: the two are symbiotic 	<p><i>Some future directions?</i></p> <ul style="list-style-type: none"> <i>A sustainable business model for WGWE</i> <i>A sustainable sport, bringing a wider audience into woodlands, generating enjoyment</i> <i>Climate and biodiversity neutral, or positive, rallying</i> <i>WRGB as a sustainable stage of the WRC: USP = leading the way on sustainability</i> <i>SMNR as a process for reflection, learning & change (e.g. review has led to formalising of environmental assessment): SMNR facilitating negotiations and collaboration via a conversation about value</i> <i>Redefine value to the local economy – mean something different by good for the local economy</i> <i>Closing the gap between different practices: spending time in / caring for forest; and one called rallying</i> <i>A change in perception – from dirty old fashioned to positive forward thinking</i> <i>NRW & Motorsports working together in collaboration (rather than compliance)</i>

Part 2: Detailed evidence and data for types of value identified as a priority by system stakeholders

2.1 Introduction and summary

Following the agreement of priority areas of value among system stakeholders, we made use of the evidence provided by stakeholder interviewees and contained in written reports and other materials that we had gathered, in order to identify and collate data and other evidence that can inform our assessment of the system against SMNR.

It should be noted that quantitative or qualitative data only provide one part of the picture of value in the system and its alignment with SMNR.

Data availability

It is also worth noting here that the sources of data associated with the rallying in WG woodlands system are limited and do not cover many of the aspects of value identified as most important by stakeholders. There is not a large amount of detailed and robust data collected in relation to many of the areas of value considered important in the system. Most data available has been collected in relation to reporting associated with financial investment in the large rallies (e.g. reporting on key outcomes for sponsors; econometric analysis to estimate economic impact and return on investment). Even with this data, it has been hard to access the detailed evidence and reporting on which headline figures are based. For example, despite much effort to access it, we have not been provided with the detailed report on which 2019 headline data is based – so although we can accept the data as accurate (it has, for example, been verified by WG) – it is not possible to critically appraise it or understand the assumptions upon which it is based. Much of the data is contained in non-academic documents reporting headline outcomes rather than detailed data and calculations. Where more detailed and academic reporting has been available, this has been significantly out of date. Other sources include:

- Informal reporting of data such as volunteer numbers from local rallies
- Informal economic impact surveys by 2 local rallies
- Presentations and reports relating to specific aspects of the system (e.g. R4W's operation)
- Non-academic, informal and non-peer reviewed reports (e.g. estimating CO2 emissions from rally events)
- Formal governance documents (e.g. a rally water management plan)
- Policy documents (e.g. environmental strategies)

The limits of our study have limited our ability to access hard to find sources or carry out primary data calculations.

The detailed evidence and data relating to each of the priority areas of value, is presented below. This evidence has been organised under the following headings / themes and a summary selection of some of the key points is presented in Table 2 below.

Evidence and data about Priority Value is organised under the following headings

1. Economic impact
2. Visitors
3. Volunteering
4. Media value
5. Forestry road use and repair
6. Local Environmental Impacts

7. Carbon emissions
8. Measures to reduce carbon footprint of rallying
9. Disruption / displacement of forestry and other activities (e.g. other recreation)
10. Displacing illegal motorsport activity(?)
11. Importance to rural communities
12. Value associated with Participation in rallying
13. Capacity and collaboration in and between Motor Clubs
14. Networks and Relationships
15. Adaptation and resilience
16. International profile and high-level showcase: for rallying and for Wales
17. Perception of Rallying in relation to SMNR
18. Governance frameworks & processes
19. Policy Context
20. Comparative scale of impacts: Rallying & other activities
21. Role in whole forestry management systems (NRW and private)
22. *Some future directions?*

Table 2: Summary selection of headline evidence and comments on evidence associated with priority types of value

Priority Value	Data, evidence and comments
Economic impact	<ul style="list-style-type: none"> • £9,87M economic impact calculated for WRGB in 2019. • £9.87M figure based largely on direct spending associated with WRGB and excludes additional value reported by stakeholders, such as: value for motorsport businesses in Wales and automotive sector more widely; Indirect value of International profile of Wales from WRGB; capacity building and training in new skills for individuals. • £1.2M total spend from non-residents calculated for the Welsh Rally Championship. • Disproportionate value reported for some areas in Wales (e.g. WRGB and the Cambrian Rallies make a very significant contribution to Conwy's visitor economy). • Economic returns accrue from significant underlying voluntary input and from the natural capital of Wales' woodlands (in contrast to the built capital necessary for stadium-based events).
Visitors	<ul style="list-style-type: none"> • 100,000+ visitors reported for WRGB, 2019 • Local rallies estimate 1000-4000 spectators (except the biennial Roger Albert Clark rally that reports an estimated 5,000-10,000 spectators over 5 days). • The number and distance of car journeys associated with visitors/ spectators is a key metric as it has a predominant influence on carbon emissions associated with rally events. • The distribution of visitors in time is important as the contribution that rally events make to sustaining visitor economies in some areas is linked to their timing (i.e. during otherwise quiet times of year). • The impact of rallies on tourism visitors at times other than during rallies (either as repeat visitors or visitors introduced to Wales and Wales' landscapes by rally media coverage) is considered important, but is poorly understood.
Volunteering	<ul style="list-style-type: none"> • 2,003 volunteers and 4,016 volunteer days involved in running WRGB 2019. • 3,010 volunteers and 5,500 volunteer days estimated contributing to organising and running 5 local rallies. • Volunteer input is essential for all rally events in WGWE, including WRGB. • The volunteers involved in Motor Clubs and Rally events represent a significant capacity for the rallying system. Many are trained so they can undertake specialist roles (e.g. stewarding) essential to rally safety and organisation.
Media value	<ul style="list-style-type: none"> • £4.54M Media Value calculated for WRGB, 2019. • £335,540 Media Value calculated for Cambrian Rally 2020. • Considered important for role in raising international profile of Wales as a tourism destination.
Forestry road use and repair	<ul style="list-style-type: none"> • 245.7 miles of forestry road in the WGWE used for rallies in 2017. • 263.2 miles of forestry road repaired by R4W in 2017: 17.5 miles repaired that had not been used for rallying to benefit NRW and local residents.

	<ul style="list-style-type: none"> • Road repaired by a non-profit generating company set up to maintain viability of rallying in WGWE, with significant expert voluntary input.
Local Environmental Impacts	<ul style="list-style-type: none"> • The range of potential local environmental impacts are considered well understood and managed by existing processes established between rally organisers and NRW. • NRW staff managing rallying in the WGWE reported that no significantly negative local environmental impacts have been recorded from rally events over many years. • However, stakeholders noted that recorded impacts will depend on how robust monitoring and reporting processes are and Stakeholders agreed that the identification, reporting and management of local environmental impacts associated with rallies should be reviewed to ensure all impacts are identified and appropriately managed. Some specific areas have been highlighted by NRW experts for further investigation including biosecurity and water pollution management. • This review has led to work within NRW to formalise the processes of managing local environmental impacts.
Carbon emissions	<ul style="list-style-type: none"> • <5% of carbon emissions come from competing cars. • Majority of emissions from travel to/from event by spectators, organisers and participants. • Informal estimate of 2460 tonnes CO₂ from fuel use for WRGB 2019 (competitors, support teams, organisers and spectators). • A 'typical one day' local rally informally estimated to produce around 8% of the CO₂ emissions of WRGB from fuel use, due to reduced mileage and especially fewer spectators. • Because rallying is a motorsport, the perception tends to be that it is environmentally negative and associated with carbon emissions.
Measures to reduce carbon footprint of rallying	<ul style="list-style-type: none"> • All rounds of the WRC (including WRGB) are required to be accredited against FIA's Environmental Accreditation Programme. • By the end of 2021 the FIA aims to have developed environmental action plans covering water, air, soil, waste and biodiversity. It will also develop a training programme for member organisations to build their capacity in taking climate action. • By 2025 all FIA members will be required to reach the top level of FIA environmental accreditation. • MSUK has a sustainability programme and environmental policy. They are developing an environmental management system. • WRGB was awarded CarbonNeutral® event status in 2008, achieved through internal reductions and external offsetting. • Cars competing in the World Rally Championship (WRC) will be hybrid by 2022 and Rally 2 cars will be hybrid by 2023. • Four of the respondents to our local rally questionnaire confirmed interest in FIA and other environmental programmes (and one was already investigating the possibility of gaining accreditation). Most reported being previously unaware of FIA's scheme.

Disruption / displacement of forestry and other activities (e.g. other recreation)	<ul style="list-style-type: none"> • Rallies require pausing of forestry operations such as harvesting although disruption is short-lived. • Rally routes and timings are organised well in advance and so disruption can be planned for. • A staff cost within NRW is required to co-ordinate rally and other forestry activities (described as significant by a stakeholder interviewee, but not quantified). • Businesses and others that we spoke to that run other recreational activities in the forest reported that the current levels of rally use were manageable, given that they get good notice of when rallies will be running. Rallies also tend to run out of peak season for other recreational activities.
Displacing illegal motorsport activity(?)	<ul style="list-style-type: none"> • There are mixed opinions as to whether legal motorsport activities influence illegal ones, and in which direction. Traditional approaches to addressing illegal motorsports do include considering provision of legal alternatives. • This review has not been able to identify data to judge this impact (and we have not ascertained if it exists).
Importance to rural communities	<ul style="list-style-type: none"> • A range of positive benefits to rural communities were reported and a number of stakeholders emphasised the importance of rallying to some rural communities. • Value to rural communities stems from a range of impacts including: contribution to social infrastructure; recreational enjoyment; skills and capacity building; feelings of pride in hosting events; funding form local community groups and charities; economic benefits for local businesses. • £266,000 raised for local charities by WRGB between 2013-2019. • Cabinet members on Conwy Council from rural areas are reported to emphasise the importance of rallies for their communities.
Value associated with Participation in rallying	<ul style="list-style-type: none"> • A wide range of different types of value were reported that are associated with the people’s participation in rallying, including: <ul style="list-style-type: none"> ○ Benefits for individuals such as: wellbeing benefits (from recreational enjoyment, social contact, participation in group activities); Learning new skills (e.g. via training as marshals or more involved participation in rally organisations); A sense of identity; Contact with the natural environment. ○ Benefits for communities, including: Social networks and social capital; Financial income; A sense of pride (in hosting events that attract many people). ○ Benefits for NRW and WG, including: A significant group of people making use of and gaining benefits from the woodland estate; Many of these people may otherwise not access or benefit from WG woodlands. ○ Benefits for the rallying in WG woodlands system as a whole, including: rally events would not be possible without the participation of large numbers of volunteers and the capacity that their networks and organisations hold; Social and voluntary capacity helps the system adapt to challenges and achieve changes. • Data associated with this range of value is mixed: data about networks and voluntary capacity with the system is reliable and available; Data about other related value such as wellbeing impacts is anecdotal. An important dimension that might

	warrant further investigation is the extent to which people involved in rallying represent a group that would otherwise not engage with or benefit from WG woodlands.
Capacity and collaboration in and between Motor Clubs	<ul style="list-style-type: none"> • Essential to the operation of rally events and constituted from: Motor Club members and volunteers; relationships between Motor Clubs; Knowledge, skills and expertise held by Clubs and their members and volunteers. • Training and accreditation provided by MSUK, especially through involvement with WRGB is important in building and maintaining skills and experience that supports rallying at the Club level. • 45 Motor Clubs in Wales, with an estimates 2,700 members and drawing from a wider pool of volunteers for rally events.
Networks and Relationships	<ul style="list-style-type: none"> • Wider networks and relationships within the system, including between motorsport organisations and with NRW. • Formal and informal governance (agreements etc) help structure and enable these. • Effective communication and collaboration are key to effective networks and relationships. • NRW's interface with motorsport networks via their relationship with MSUK and R4W enables them to reach a large audience within motorsport networks.
Adaptation and resilience	<ul style="list-style-type: none"> • History of adaptation by the rallying in WG woodlands system helps illuminate the system's capacity for change in the future (together with other aspects such as networks and relationships and indications about system direction). • Rallying was described by stakeholders as inherently innovative and a range of past examples of adaptation and resilience were provided, including: <ul style="list-style-type: none"> ○ Rally 4 Wales' establishment to address the challenge of economically repairing roads following rallies. ○ Iterative and ongoing improvements to systems for managing and mitigating local environmental impacts. ○ The evolution of Health & Safety measures and processes. ○ Adaptation to competing cars to mitigate environmental impacts. ○ Changes to rally events to maintain spectator interest. • The majority of stakeholders engaged in the review considered the rallying in WG woodlands system as capable of change and adaptation. • Some stakeholder interviewees highlighted the importance of key stakeholders in facilitating and allowing change and a small number expressed concern that centralised governance structures could influence how effectively and quickly the system can respond to requirements for change.
International profile and high-level showcase: for rallying and for Wales	<ul style="list-style-type: none"> • Contribution to Wales' international profile and showcasing Wales' natural environments is considered to play an important role in marketing Wales, principally as a tourism destination. • The high-level showcase that WRGB provides for rallying as a sport is considered important in attracting new competitors and spectators / fans. • The potential for promoting other aspects of Wales (e.g. taking a lead on sustainability) was identified by some stakeholders.

	<ul style="list-style-type: none"> • Indirect evidence related to media coverage (presented above). Although stakeholders confirmed that the impact of WRGB on Wales' international exposure had been researched, this review was not able to access any detailed data or evidence on this.
Perception of Rallying in relation to SMNR	<ul style="list-style-type: none"> • The perception of rallying on the WGWE is an important dimension of value, especially given WG and NRW policies (including SMNR). • Stakeholders discussed the fact that because rallying is centrally concerned with cars, it can be negatively perceived in relation to climate change and other environmental impacts. • Stakeholders also discussed the fact that this perception is potentially not supported by objective consideration of the rallying system and that, for example, other recreational activities that may appear more environmentally friendly may be associated with comparable or even higher carbon emissions. • Perceptions can be influenced by 'taste' (in the sociological sense) as much as by objective facts about the system.
Governance frameworks & processes	<ul style="list-style-type: none"> • These enable and facilitate networks and relationships and are fundamental to the operation of the system and generation of different types of value. • They also contribute to the resilience and adaptive capacity of the system; and provide a mechanism to influence and monitor change. • A wide range of informal and formal governance frameworks and processes are involved in the rallying in WG woodlands system, including: Overarching policies (e.g. Env (Wales) Act); Guidance and Principles (e.g. SMNR); Structural arrangements (e.g. Master agreement between MSUK and NRW); Sponsorship and funding arrangements; Procedures and arrangements for specific aspects of rallying (e.g. H&S, Environmental impacts, route allocation).
Policy Context	<ul style="list-style-type: none"> • Centrally important to any system as it describes the space the system needs to operate in and provides direction. • Key policies highlighted by stakeholders included: Declaration of Climate Emergency and carbon neutral targets from WG; Woodland for Wales Strategy. • Some aspects of these that were emphasised included: <ul style="list-style-type: none"> ○ The need to address carbon emissions at a global scale to respond effectively to Climate Emergency, making it important to consider if actions lead to overall reductions or only displacement of emissions elsewhere. ○ A key aspect of the Woodland for Wales strategy considered relevant was the aim of broadening public engagement with WG woodlands and ensuring that benefits from woodlands were accessed equitably.
Comparative scale of impacts: Rallying & other activities	<ul style="list-style-type: none"> • Considered important as it helps put rallying's impacts into more objective context; and because judging sustainability / SMNR cannot be absolute. • Key areas where comparison was thought to be important by stakeholders included: <ul style="list-style-type: none"> ○ Other forest uses, including recreational and commercial. ○ Other major sporting events (though not many were considered closely comparable).

	<ul style="list-style-type: none"> ○ Carbon emissions from travel for various recreational activities (e.g. mountain biking, walking, fishing). ○ Participant spending in the local area, compared to other recreational woodland users. ○ Time dimension of impacts – concentrated over a few days for rallying versus spread out through the year from other woodland uses.
Role in whole forestry management systems (NRW and private)	<ul style="list-style-type: none"> ● Rallying is one of many activities taking place within wider forestry / woodland management systems and can play a part in the wider system model. ● One example is the contribution that income from rally testing was reported to make to a sustainable forestry system on private land. ● Rallying in the WGWE currently contributes to the system in a number of ways including road repair and enabling a wide audience to derive benefits from woodlands. ● WG’s planned National Forest will be designed to integrate a wide range of mixed uses and activities, providing benefits from healthy woodlands to as wide a range of people as possible.
<i>Some future directions?</i>	<ul style="list-style-type: none"> ● This aspect of value is important because it provides an indication of plausible future directions; and evidence about intentions and interests of different stakeholders, as well as the extent of consensus or disagreement between different stakeholders. ● There was notable alignment and consensus among many of the stakeholders, from within NRW and motorsports organisations, about the types of changes needed and the directions for change in the rallying in WG woodlands system. ● Some of the key themes about changes needed or the direction for change, that emerged from workshop discussions and stakeholder interviews, included: <ul style="list-style-type: none"> ○ Reduce CO₂. ○ Achieve biodiversity net gain ○ Capitalise on and maximise positive outcomes (including economic and the engagement of a wide and possibly hard-to-reach audience with woodland benefits). ○ Lead change and bring others with you (e.g. by engaging others, innovating and influencing behaviours). ○ Use governance to drive, deliver and monitor improvement (e.g. using the Master Agreement) ○ Collaboration and communication are key to change – working together will facilitate more effective change. ○ Using the SMNR framework to facilitate collaboration and whole system progress (at all levels).

2.2. Detailed evidence and data relating to each of the priority areas of value

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1. Economic Impact

Introduction

Economic impacts are an important aspect of value in any system and remain important within the SMNR framework (albeit with an altered focus on regenerative economies rather than traditional economic measures). The economic impact of rallying in the WGWE has been a central consideration in past support for rallying by WG and other public bodies in Wales. The focus of this interest has been on the economic benefits that the Wales Rally GB (WRGB) event brings to local areas and to Wales as a whole. This impact has been judged predominantly in relation to the impact the event has on visitor spending in the hospitality sector (see details below).

Data, evidence and comments

i. The range of economic impacts from rallying in WG woodlands
Evidence collected by this review reveals that rallying in the WGWE has a wide range of economic impacts beyond this narrow measure, many of which are poorly understood and evidenced. The range of economic value from rallying in WG woodlands, reported by stakeholders engaged by this study is summarised in the following **Table XX**:

Table XX: Summary range of types of economic value reported by stakeholders¹

Area of economic impact	Detail	Examples / comments
Economic impact for NRW	<ul style="list-style-type: none"> • Payment for use of forestry for rally events. • From testing income. • In kind road repair and improvement. 	<ul style="list-style-type: none"> • Largely cost covering, with minor net improvement to forestry road network.
Income for private forestry landowners	<ul style="list-style-type: none"> • Income from testing (rally teams testing cars prior to events). 	<ul style="list-style-type: none"> • One private forestry operator reported income of approximately £15,000/yr from testing. • Can help cover costs of road building and maintenance and contribute to sustainable forestry systems.
Income for local community groups or charities	<ul style="list-style-type: none"> • Rally events usually involve local community groups or organisations, often asking them to help run e.g. car parks or programme sales in return for a portion of the profits or a donation. 	<ul style="list-style-type: none"> • Can provide significant income to community groups or charities (see detail under 'Importance to Rural Communities' section).
Tourism and Hospitality	<ul style="list-style-type: none"> • Direct income from rally competitor teams and spectators during events. • Indirect income from repeat visitors or sports tourism. • Indirect income from visitors attracted to Wales 	<ul style="list-style-type: none"> • A key contribution that rallying makes to these sectors follows from the fact that rallies tend to be held in the Autumn or Winter and so help extend the visitor season for hospitality businesses. In this way, rallies can act as

¹ (Stakeholder interview(s), this study)

	due to rally media coverage.	<p>key parts of the jigsaw in sustaining tourism and hospitality sectors.</p> <ul style="list-style-type: none"> • Proportionately different importance for different local economies (e.g. Conwy has a particularly important hospitality sector). • Impacts for different local areas in Wales and for Wales as a whole.
Local retail income	<ul style="list-style-type: none"> • Spending in shops, food businesses and fuel outlets, associated with rally events. 	
Income for other local businesses (non-rally or motorsport specialist)	<ul style="list-style-type: none"> • Rally events involve expenditure on other services such as printing (e.g. signage and programmes) and engravers (for cups and shields). 	
Income for rally and motorsport businesses	<ul style="list-style-type: none"> • Specialist rally related jobs including: timekeepers, recovery teams, radio-operators and medics • Car and parts manufacturers and suppliers • Specialist car and engine building and servicing 	<ul style="list-style-type: none"> • Specialist rally roles are sometimes paid a professional rate but sometimes just receive payment to cover costs • Specialist rally suppliers, garages and engineering do significant export business
Benefits for the Motor Industry	<ul style="list-style-type: none"> • Technological developments and research in rallying can filter down to the wider motor industry 	
Welsh Automotive and Engineering expertise	<ul style="list-style-type: none"> • Links between rallying and these sectors, include: innovation; contributions to demand for these sectors; recruitment of new people into related education and businesses 	<ul style="list-style-type: none"> • E.g. Rallies have been used to interest school children in engineering and STEM subjects. • Parts of Wales' University sector have strong automotive engineering departments
Supporting jobs	<ul style="list-style-type: none"> • Through the indirect impacts on hospitality, 	<ul style="list-style-type: none"> •

	<p>motorsport businesses, etc.</p> <ul style="list-style-type: none"> • 1 Direct job reported created in Rally 4 Wales (Road repair organisation) 	
Capacity building and training	<ul style="list-style-type: none"> • Volunteers involved in Motor Clubs and Rally organisation receive training which contributes to personal skills and experience • Training and skills represent significant capacity which allows large rally events to be run successfully 	<ul style="list-style-type: none"> • E.g. stakeholders reported receiving training in skills including: First Aid and Fire Safety; and receiving experience in organisational and management roles.
Knock-on interest from advertisers	<ul style="list-style-type: none"> • A number of car manufacturers have made advertisements for consumer cars using landscapes featured in the WRGB, e.g. Volkswagen, Land Rover and MG. 	
Economic impacts on Motor Clubs	<ul style="list-style-type: none"> • Income from rally events supports club activities throughout the year and enables them to run smaller amateur and youth events. 	

Some observations about the different economic impacts associated with rallying in the WGWE, include²:

- The economic value that emerges from the system relies significantly on the base of voluntary effort, passion and capacity within Motor Clubs.
- It also, notably, derives from Wales' natural capital in contrast to some other sporting events that require the built capital of stadiums etc.
- The rallying in WG woodlands system is not a primarily commercial activity. Where economic benefits emerge, these are not the primary aim of most stakeholders (with the exception of, for example, WG and Local Authority sponsors that are primarily interested in the contribution that major rally events make to Wales' local and national economies). Looking at the system as a whole, financial income appears to be facilitative of the activity of rallying, rather than the primary driver.

² (Stakeholder interview(s), this study); Researcher observations; (Elster-Jones, 2021a); (Elster-Jones, 2021b)

The evidence from stakeholders engaged by this review, is complimented by evidence cited by Econactive's (2005: 10) evaluation of Wales Rally GB³, which reports that the econometric analysis they carried out (largely based on direct spending attributable to the event), '*reveals a rather narrow view of the economic effects...*'. Additional potential impacts that they cite (drawing on wider research) include⁴:

- Links between motorsport events and '*wider elements of the value chain*' including: sports regulation, education, car constructors and their suppliers, race teams and events suppliers⁵.
- Motor sport events can '*play a pivotal role in a larger industry which contributes to national manufacturing excellence and exports and creates a series of knowledge spill overs to other UK industries.*'⁶.
- There is evidence that large scale events can assist community development, improve partnership working, develop tourism prospects and improve labour participation.
- Additional visitor spending on locally produced goods and services.
- Strengthening the external profile of the regional economy.
- Developing the tourism and general location offer.
- WRGB is '*seen as offering a 'halo' effect on motorsport education in Wales.*'⁷.

ii. Econometric studies

• Economic Impact of WRGB

The 2019 economic impact report, which MSUK are contracted to provide as a condition of the grant award from the Welsh Government, indicated a 'direct economic impact' to Wales of £9.78m. This excludes any spend outside of Wales.

The data was collected from event spend, ticket sales, visitor surveys, social media and TV statistics. The total spend is made up of the following elements:

Spend Type	£	Notes
Spectator spending	£4,460,386	
Attendee spending	£4,845,684	Participants, media etc
Organiser spend	£1,530,819	Spend in Wales only
	£10,836,889	
Leakages	£969,137	Spectator and Attendee Spending with Non-local Vendors
Direct Economic Impact	£9,867,753	

Previous economic studies of WRGB have indicated comparable values. A study⁸ of the 2004 WRGB calculated £7.1m of 'additional output to the Welsh economy', whilst a study⁹ of the 2010 indicated that £4.8m of 'additional economic output in Wales'. Since 2010, reported ticket sales (53k v 77k) and participant (61 v 123) numbers have increased significantly, hence the increase in values is to be expected.

This needs referencing...

³ (Econactive, 2005)

⁴ Ibid.

⁵ Ibid: 10.

⁶ Ibid: 10.

⁷ Ibid: 48.

⁸ (Econactive, 2005).

⁹ (Welsh Economy Research Unit, 2011)

The 2019 report provides a relatively simplistic view in that it records direct spend only and does not take account of any indirect or induced spending. Economic impact assessments would normally include an element of indirect spend, which is calculated by applying a ‘multiplier’ to the net spend. This provides for the spend on, for example, additional labour engaged or supplies purchased by accommodation providers or retail premises. For tourism and visitor events, an average multiplier of 1.3 is typically used. In the case of the 2019 WRGB, it would give an economic impact of £12.8m.

There has also not been any attempt to measure the economic impact in any other form e.g. Gross Value Added (GVA)¹⁰. The 2004 study quoted above calculated GVA of £3.8m, and the 2010 report, £2.4m. It is not possible to calculate the GVA of the 2019 event with the available data.

The 2019 WRGB report also does not assess impacts on jobs, either safeguarded or created. Broadly speaking, it is possible to assess how much spending is required in order to support a job in any particular sector – tourism having a different spend level to, for example, engineering or IT. A 2013 report¹¹ for Visit Britain calculate that it is necessary for an additional £54,000 extra spending is required to support a full-time job in tourism in the UK. Analysing the available data from the 2019 WRGB economic impact report, this gives job estimates as follows.

	<u>Spectators</u>	<u>Attendees</u>
Commercial stayers	11696	5763
Av length of stay	2.8	5.6
Av cost per bed night	£53.00	88.67
Av daily spend	£55.48	61.21
Total spend	£108.48	£149.88
Total spend	£3,552,589.82	£4,837,047.26
£ per job	54000	54000
<hr/>		
Sub-total jobs supported	66	90
TOTAL		155

- Other available data relating to the economic impact of motorsports on the WGWE includes:
 - Rally4Wales, the company set up to undertake road repairs after events, recorded a turnover of £257,000 in 2018, with a profit of £12,000. Administration overheads were 13.5% of the total.
 - An analysis¹² of surveys from the Welsh Rally Championship indicated that the estimated total spend from ‘out of area’ people (i.e. non-resident) for the three rallies surveyed was £754,874 and for the WRC as a whole, £1.2m. In each case, spectators were responsible for less than 25% of total spend, reflecting the analysis undertaken in Dumfries and Galloway (see below).
 - An in-house study of the 2019 Rally North Wales indicated a total spend by competitors and organisers of £143,480. An equivalent study from 2018 and 2016 indicated spends of £136,880 and £137,280 respectively. The studies did not assess any spend by spectators.

¹⁰ GVA is an accepted means to measure economic output and to compare individual countries, regions, sectors or producers. It is calculated by assessing the value of good and services produced less the cost of inputs and materials.

¹¹ Deloitte, Oxford Economics (2013). Tourism: jobs and growth. The economic contribution of the tourism economy in the UK. Visit Britain.

¹² Evison D. (2018). An Analysis of Surveys for the MSA Welsh Rally Championship.

- The Directory of Welsh Motorsport Companies¹³, produced in 2013 on behalf of the Welsh Government, identified 87 companies or organisations based in Wales that were involved in motorsport in some form. This included design, manufacturing, testing, venues, PR and other business areas. Of these, 37 specifically mentioned rallying either in their name or description of services, others were probably involved in rallying (e.g. as parts suppliers) but did not specifically state it. Individual employment numbers were not recorded, but 33 were in the 1-10 employee category, 3 in the 11-50 and 1 unspecified.
- In 2004, the benefit to cost (return on investment) was estimated for WRGB as around 2.1:1 (and 2:1 when considering only value added created by monies wholly new to Wales). This figure does not include additional benefit from media coverage or return visitation (i.e. is based on the limited direct spending figures used in the analysis)¹⁴.

iii. Comments and comparisons

- The econometric studies of WRGB generate estimates of economic impact based primarily on direct spending estimated as associated with the event. In the context of the wider view of economic impact discussed above (and even in the relatively narrow terms of an econometric approach), the resulting headline figures seem likely to represent an underestimate of economic impacts.
- The total value of visits to the outdoors for recreation by residents of Wales is approximately £5.6bn, based on 437 million visits with an average spend of £12.74¹⁵. This does not include spend by non-residents, which in the case of rallying is the majority of spend.
- It is worth noting that the 2004 and 2010 events primarily took place in South and Mid Wales whereas the 2019 event took place in North and Mid Wales. Given the relative performance of the economies in these areas, and their relative dependence on tourism, the same level of direct economic impact may have differing outcomes in terms of additional spend and net impact in different regions.
- A 2020 study¹⁶ found that in Powys, 18 businesses ‘targeted the mountain bike and adventure sport tourism consumer market’. This had grown from 3 such businesses in 2000.
- Studies of motorsport elsewhere in the UK included a report¹⁷ on three rallies in Dumfries and Galloway, a region that shares many characteristics with rural Wales in terms of its land use, settlement patterns, economic activity and motorsport heritage. This report calculated that the total economic impact was £591,112, of which competitors, organisers and volunteers accounted for 89% of total spend.
- A representative from one of the companies listed in the Welsh Motorsport Companies Directory took part in the Multi-Stakeholder Workshop during this study and they estimated that under 10% of their turnover was related to the WRGB (although this fraction was important to their overall business).
- Of 13 events supported by Conwy Council over 2018-2019, the two Wales Rally GB events were in the top three in terms of calculated return on investment for the council (resulting in an estimated 78:1 and 43:1 return on investment for the Council in 2018 and 2019, respectively)¹⁸. The more local Visit Conwy Cambrian Rally (sponsored by Visit Conwy) provided an estimated

¹³ Strategic Marketing (2013). Motorsport Wales: Directory of Welsh Motorsport Companies 2013/14. Welsh Government.

¹⁴ (Econactive, 2005)

¹⁵ Natural Resources Wales (2016). Welsh Outdoor Recreation Survey Key Facts for Policy and Practice: Summary Report. Natural Resources Wales.

¹⁶ Lancaster T (2020). BSc Business & Management Independent Project ‘Understanding the Socio-economic Impacts of Commercial Mountain Bike Tourism on Rural Areas’. Aberystwyth University.

¹⁷ MKA Economics (2015). Economic Value of Motorsport in Dumfries and Galloway 2014. Dumfries and Galloway Council.

¹⁸ (Conwy County Borough Council, 2019)

12:1 return on investment and is notable for being the only event taking place in February (with both WRGB events taking place in October, corroborating the reported importance of rally events in helping support an extended visitor season). The two WRGB events are also notable among the 13 in terms of the size of calculated impact on the Conwy economy, with WRGB 2019 estimated to have led to an input of £4.3M pounds to *'our economy'*¹⁹. In comparison, the National Eisteddfod held in the County was estimated to have contributed between £6-8M and the next largest contribution was an estimated £1.25M from the 10th Annual Armed Forces Day held in Llandudno (both of these events took place in the Summer and the National Eisteddfod is not something that has an annual impact as its location moves around Wales²⁰).

- The 2005 Econactive report comments that the estimated £7.1M in *'additional Welsh Output' contributed by WRGB, is 'on a similar scale to other events in the Principality'*²¹, reporting that the 1999 Rugby World Cup was estimated to contribute £50M to regional demand (using similar methods to the Econactive study) and that the FA Cup in Cardiff had been estimated to create around £2M in additional demand in the City²². The 2011 Welsh Economy Research Unity report is more downbeat, reporting that *'The rally's [WRGB] economic impact is modest compared with the most valuable events held in Wales'*²³ and citing around £25M in economic impact generated by the 2006 Heineken Cup Final.
- This study hoped to identify further evidence about the economic impact of comparable events, but this has proved not to be possible within the scope of our work. Some potentially comparable events suggested by stakeholders include: Volvo Ocean Race's Cardiff leg in 2018 and the Tour of Britain.

Links

- Public sponsorship.
- Carbon emissions (economic impacts are generally calculated largely on the basis of visitor spending and the higher this is, the more visitors and hence the larger the CO₂ impacts).

2. Visitors

Introduction

This aspect of value relates to the impact the rallies have on visitors to the areas where the rallies take place and to Wales in general. This includes spectators who come to see the rallies as well as visitors who are attracted to the areas where the rallies take place – or Wales more generally – as a result of the rallies. Visitor numbers are important because, as well as indicating the popularity of and in some ways justifying the events:

- They contribute significantly to the level of economic benefit associated with rallies (economic benefit is largely calculated on the basis of spending by those attending rallies (e.g. on accommodation, fuel or food; as well as the benefits from tourism visitors who first became interested in visiting Wales because of their interest in the rallies).
- They also contribute significantly (and probably predominantly) to the carbon emissions associated with rally events. A 2008 Carbon audit of WRGB found that only 5% of carbon emissions from the event were associated with competing cars and that the majority of emissions were from *'travel to and from the event by spectators, teams and officials.'*²⁴.

Related aspects of priority value include:

¹⁹ (Conwy County Borough Council, 2019, p. 27)

²⁰ *Ibid.*

²¹ (Econactive, 2005, p. 59)

²² *Ibid.*

²³ (Welsh Economy Research Unit, 2011, p. 1)

²⁴ (WRGB, WRGB drives towards a sustainable future, web site article:

<https://www.walesrallygb.com/wrgb-drives-towards-a-sustainable-future/>, accessed 20/12/20, 2008)

- **Number and distance of car journeys to spectate:** this is important because it influences the carbon emissions impact of events.
- **Tourism visitors (direct/indirect) + distribution in time:** This is important because it is a significant aspect of the economic value that rallies bring into areas. The distribution of visitors in time is important because one of the most important aspects of rallies to local areas is the fact that they can contribute to extending the visitor season into the autumn for hospitality businesses (which can make a significant difference to year-round operation and viability)²⁵.

Data and Evidence

- Over 100,000 visitors to Wales Rally GB 2019²⁶ [53,600 in 2010²⁷; 51,000 in 2004²⁸]
- Local Rallies report approximately 1000-4000 spectators, except Roger Albert Clark that reported 5,000-10,000 over their 5-day event.
- As an indication of the number of spectators who travel to Rally events (rather than come from local areas): in 2004, around 80% of spectator spending, and 95% of other spending was reported as from outside Wales and in 2010 these figures were reported as 75% and 95%, respectively. It should be noted that this does not give a straightforward indication of numbers attending from outside the event area as spending is likely to be heavily skewed towards visitors from away and they will need to pay for accommodation, etc.
- Two of the respondents to our survey of local rallies / Clubs said that although they did not have detailed information about where spectators and participants travelled from for their rallies, they were aware that volunteer marshals and spectators travelled from:
 - Cheshire, Shropshire, Merseyside, Greater Manchester, West Midlands, Yorkshire, Lancashire & North West England, North and Mid-Wales.

People deciding to visit Wales other than to watch rallies but because of their interest in rallying (either because they have come to a rally and liked the area or because they have been attracted to the Welsh landscape as a result of media coverage of rally events), is considered to be an important effect of rally events (especially WRGB)²⁹. However, there is little data to indicate the scale of this effect. For example the 2004 and 2010 econometric studies did not look at this effect in detail, with Econactive (2005: 27) stating: *'Enumeration of the latter element is a complex and specialist task and as such outside the scope of this report.'* Available evidence includes:

- 1 in 10 survey respondents from outside Wales said that visiting the Rally had a strongly positive influence on their likelihood of returning for a non-Rally related holiday in future, and a further one in three claimed a generally positive effect.³⁰
- **Rally North Wales have conducted a survey with ?? and report that**³¹
- Conwy Council staff report anecdotal evidence (e.g. from informal feedback from hoteliers) that repeat visits do occur and that sports tourism (where people come to drive their cars on the forest roads) generates further visits.³²
- Conwy Council staff also reported that they have carried out research to interrogate the impact the event has on media exposure for Welsh landscapes in different international markets³³.

²⁵ (Stakeholder interview(s), this study)

²⁶ (WRGB, 2019)

²⁷ (Welsh Economy Research Unit, 2011)

²⁸ (Econactive, 2005)

²⁹ Stakeholder interviews from this study – a number of stakeholders cited this effect and gave anecdotal evidence to support this; (Econactive, 2005)

³⁰ (Econactive, 2005)

³¹ (Rally North Wales, 2019)

³² (Stakeholder interview(s), this study)

³³ Ibid

- Stakeholder interviewees for this study reported that Welsh landscapes used for rally events (e.g. the Great Orm) have been featured in motorsport computer games which increases recognition and exposure³⁴.
- 28% of the non-Welsh resident visitors to the Rally who stayed overnight in Wales had never before taken a holiday in Wales (indicating that the rally does introduce new people to Wales – how this translates into future behaviour is not known³⁵).

Comments on data

Figures for visitor numbers to WRGB 2019 are official and reported according to approved WG processes. Figures from local rallies are estimated, but likely to be fairly accurate as they are largely based on car parking ticket sales. Ceen (2021) reports that WRGB produces an aggregate estimate of spectator mileage based on ticket and car park data³⁶.

Links

- CO₂ emissions
- Economic value
- People using and getting value from woodlands (including diverse audiences)

3. Volunteering

Introduction

Rallying is based significantly on voluntary effort by Rally Club members and organisers. Volunteering is an integral and essential part of rally events and the events (including WRGB) could not take place without it.

Data and evidence

- 2003 volunteers helped run WRGB 2019³⁷
- 4016 volunteer days contributed to running WRGB, 2019³⁸
- 3010 Volunteers involved in 6 local rallies³⁹
- Over 5,500 Volunteer days contributed to running 6 local rallies (Rally North Wales, Cambrian Rally, Woodpecker Stages, Nicky Grist Stages, Pains Rally, Roger Albert Clark Rally)⁴⁰

Comments on data

Figures for WRGB 2019 are official and reported according to approved WG processes. Figures from local rallies are estimated, but likely to be fairly accurate as the rallies are well managed and rely entirely on voluntary input.

Links

- Economic value
- Qualitative wellbeing benefits, such as recreational enjoyment, camaraderie, social capital
- People using and getting value from woodlands (including diverse audiences)
- Volunteering is foundational to the whole rallying in woodlands system

³⁴ (Stakeholder interview(s), this study)

³⁵ (Welsh Economy Research Unit, 2011)

³⁶ (Ceen, 2021)

³⁷ (WRGB, WRGB Infographic, 2019)

³⁸ Ibid.

³⁹ (Local Rally responses to study questionnaire, 2020)

⁴⁰ Ibid

4. Media Value

Introduction

Media value relates to the media coverage generated by rallying. This is valued economically by estimating the cost of buying similar amounts and types of media coverage. It's value in the context of rallying, as considered by stakeholder interviewees, is significantly associated with the impact it has on promoting Wales and Welsh landscapes⁴¹.

Data and evidence

- WRGB, 2019⁴²
 - Social Media reach: 92,591,066
 - UK media coverage: 32,530,000 impressions
 - Media value calculated as: £4,540,000
- Cambrian Rally 2020⁴³
 - Llandudno launch of UK Rallying Season: Audience reach = 16,800,000; Total Media Value = £335,540
 - Social Media reach: 12,648,369

Comments on data

Data is from official reporting for sponsors and so is likely to be carried out according to standard methodologies by specialist firms.

Connections

- Economic value
- International profile and exposure for Wales

5. Forestry Road use and repair

Introduction

Rallying makes use of forestry roads and the issue of damage and repair to these has been an important consideration in the management of rallying in the WGWE. With the transfer of responsibility for the WGWE from the Forestry Commission to NRW and the change in approach to road repairs within NRW (e.g. reduction in in-house repair capability), the cost of road repairs was reviewed and a higher cost to cover repairs requested from rally organisers. This led to a crisis for rallying in WGWE as the costs requested would have threatened the economic viability of rallies. The solution to this problem was the establishment of an independent not-for-profit company, Rally 4 Wales Contracts Ltd. (R4W). R4W was established in 2015/16 and now has responsibility for repairing all roads used for rallying to a standard as good as or better than they were before the rally. R4W has agreed with NRW and Motorsport UK that they will manage the allocation of routes to rallies, which ensures that repairs can be carried out most efficiently. R4W operate on an essentially cost covering basis (and is supplemented with significant voluntary input by those involved; and was enabled by the fact that a rally enthusiast runs an area of forestry and so has access to appropriate machinery and expertise). Stakeholders interviewed for this review report that without a not-for-profit organisation, it would be hard to keep road repair costs at a level that allows the business model of rallying to operate successfully⁴⁴.

⁴¹ (Stakeholder interview(s), this study)

⁴² (WRGB, WRGB Infographic, 2019); (WRGB, 2019)

⁴³ (Motorsport UK, 2020)

⁴⁴ (Stakeholder interview(s), this study)

Data and evidence

- NRW woodland estate includes approximately 4,000km of roads, including 1,600km of arterial roads (that are used for harvesting and can be used for rallying)⁴⁵.
- In 2017 263.2 miles of forestry road was graded and compacted (repaired) by R4W⁴⁶.
- This included 17.5 miles of road repaired over that amount that had been used for rallying, which benefitted NRW, rallies and local residents⁴⁷.
- This represents a use to repair ratio of 1:1.07 (calculated for this study).
- Stone used for road repair is sourced and used according to an approved code of practice, the Quarries Regulations 1999⁴⁸.
- The road repair model is non-profit generating and approximately cost-covering (the company has 2 non-rally customers). One full time member of staff is employed by the company (i.e. supported by the road repair operation)⁴⁹.
- The repair process can result in roads being returned to a better condition than before the rally event⁵⁰.

Comments on data

The evidence on road repair has been reported by the road repair company R4W. Distance of road used and repaired can be verified (and is confirmed by NRW staff). Evidence about improved road condition is reported by stakeholder interviewees and could be verified.

Comparisons

- Rallying may have a high-profile impact but in comparison with forestry management generally, it is at a small scale, time and space-wise. E.g. NRW are managing 4-5,000ha blocks of forest and timber operations involve 28,000 lorry journeys through the forestry per year, carrying 77,000m³ of timber⁵¹.

Links

- Economic viability of rallies
- Route allocation governance
- Volunteering

6. Local Environmental Impacts*Introduction*

A range of local environmental impacts that could be associated with rallying in WG woodlands were reported by stakeholders, including:

- Toxic spills, incl. fire pollution
- Water pollution
- Biosecurity issues – e.g. movement of INNS or disease material
- Damage or disturbance to species and habitats
- Litter
- Noise
- Traffic
- Historic monument impacts

⁴⁵ (Rally 4 Wales, Undated)

⁴⁶ Ibid.

⁴⁷ Ibid.

⁴⁸ Ibid.

⁴⁹ Ibid.

⁵⁰ Reported by stakeholder interviewee.

⁵¹ Workshop participant, (Elster-Jones, 2021b)

Stakeholders interviewed and involved in the workshops agree that these impacts are largely well understood and managed through ongoing and iterative contact between rally organisers and NRW staff. For example one NRW staff member reported that management and mitigation of water pollution from rally events had improved significantly over the last 5 years or so via detailed and positive work by rally organisers and NRW staff, which has included ongoing process and procedures as well as the development of formal water management plans⁵². However, the point was also made by stakeholders that evidence of environmental impacts (and their successful management and mitigation) is reliant on identification of potential impacts and their monitoring and reporting. Some stakeholders questioned the extent to which all impacts were appropriately monitored and reported. NRW staff at the local level and who are closely involved with managing rallying events felt that environmental impacts were sufficiently identified and appropriately managed. This includes via formal and informal mechanisms (e.g. via Habitat Regulation Assessment and Forest use permission processes; the informal application of expertise and experience by NRW officers)⁵³. However there was agreement that the process by which impacts are identified, monitored and managed within NRW could benefit from greater transparency and formalising. NRW staff leading on work with rallies have started the process of reviewing and formalising this work within NRW, as a result of this finding emerging during this review⁵⁴.

Data and evidence

- NRW staff managing rallying in the WGWE reported that no significantly negative local environmental impacts have been recorded from rally events over many years⁵⁵.
- NRW staff are confident that most local environmental impacts have been identified and are well managed.
- Stakeholders agreed that the identification, reporting and management of local environmental impacts associated with rallies should be reviewed to ensure all impacts are identified and appropriately managed. Some specific areas have been highlighted by NRW experts including biosecurity and water pollution management (see Appendix 2 of NRW Stakeholder Workshop Report⁵⁶).
- Formalisation of this process of local environmental impacts has also been identified as an area for further work that has commenced already as a result of this SMNR review process.

Comments on data

As discussed above, the monitoring of local environmental impacts has been identified as an area for further investigation within NRW. While some impacts are well monitored, the collection of data on others may need further consideration.

Links

- Ecosystem quality and resilience.
- Biodiversity.
- Experience of other forestry users, communities and residents.
- Perception of rallying and its alignment with SMNR.
- Governance processes and frameworks

⁵² Written submission from NRW staff following NRW Stakeholder Workshop (see (Elster-Jones, 2021a)).

⁵³ (Elster-Jones, 2021a); (Elster-Jones, 2021b)

⁵⁴ Ibid.

⁵⁵ (Stakeholder interview(s), this study); (Elster-Jones, 2021a);

⁵⁶ (Elster-Jones, 2021a)

7. Carbon emissions

Introduction

Carbon emissions are a central priority in relation to any activity given the Climate Emergency. WG declaration of Climate Emergency and announcement of the target of achieving carbon neutrality by 2030 provides a policy impetus within Wales. In the context of rallying, carbon emissions are particularly prominent as a consideration due to the central role of cars. This means that carbon emissions are a necessary part of the system and that the system is inevitably associated with carbon emissions: in the words of one of the stakeholders we interviewed,

'Our problem is that fossil fuels are up front and in your face'⁵⁷

A 2008 carbon audit of WRGB found that only 5% of the carbon emissions associated with the event were due to competing cars, with the majority being due to *'travel to and from the event by spectators, teams and officials.'*⁵⁸. This demonstrates that objectively, rallying is not likely to be associated with significantly greater carbon emissions than other sporting events or recreational activities and in fact may be responsible for fewer emissions than other recreational activities that do not involve cars but which make use of car journeys to reach the activity (e.g. recreational walking or mountain biking, where numbers of participants and associated car journeys may be larger than those associated with rallying)⁵⁹.

Sources of carbon emissions related to rallying include⁶⁰:

- Competitor cars
- Competitor support teams
- Spectator travel
- Road repair
- Quarrying for stone for road repair
- Other emissions related to hosting events (e.g. associated with printing or running service parks).

A number of the stakeholders interviewed raised the question about the carbon emissions attributable to rallying from quarrying for road repair materials. It was felt that this needed further investigation and this point was repeated during stakeholder workshops⁶¹. NRW staff made the point that a detailed carbon (or preferably ecological) footprint assessment would allow all involved to understand where environmental impacts arise in the rallying system and take action accordingly. The point was made that audits can often focus on obvious environmental impacts of sources of carbon emissions, while missing the often more significant embedded or supply-chain impacts⁶².

Data and evidence

- <5% of carbon emissions come from competing cars
- Majority of emissions from travel to/from event by spectators, organisers and participants.

One of the stakeholder interviewees involved in this study, Richard Ceen from Rally 4 Wales, has carried out a calculation to estimate Carbon emissions from rallying events. This work is written up

⁵⁷ (Stakeholder interview(s), this study)

⁵⁸ (WRGB, WRGB drives towards a sustainable future, web site article:

<https://www.walesrallygb.com/wrgb-drives-towards-a-sustainable-future/>, accessed 20/12/20, 2008)

⁵⁹ A point made by a significant number of stakeholders we interviewed (Stakeholder interview(s), this study)

⁶⁰ (Stakeholder interview(s), this study)

⁶¹ (Stakeholder interview(s), this study); (Elster-Jones, 2021a)

⁶² (Stakeholder interview(s), this study)

into a paper which details the methodology used and has been submitted to MSUK⁶³. Emissions are calculated on the basis of estimated fuel consumption, associated with known or estimated mileage and modes of transport associated with four different rallies: WRGB 2019; the 2020 Covid-compliant (no spectator) Rali Adfer Coedwigoedd Cymru (Welsh Forest Revival/Restoration Rally); Historic Enduro Rallying Series 2018; and an estimate for a 'typical one-day national rally':

- Fuel use by competitors, support teams, organisers and spectators for WRGB 2019 is estimated to produce 2460t CO₂⁶⁴.
- A 'typical one-day National Rally' has been estimated to produce around 8% of the CO₂ emissions of WRGB from fuel use (180 tonnes CO₂), due to reduced mileage and especially the reduced number of spectators⁶⁵.
- The 2020 Rali Adfer Coedwigoedd Cymru (Welsh Forest Revival/Restoration Rally) was run as a Covid-compliant event with no spectators and online document submissions allowing an accurate estimate of fuel consumption for competitors, support teams and organisers of 1644 kg of CO₂⁶⁶ (note Kg rather than tonnes in this case).

The 2011 Welsh Economy Research Unit report on WRGB used a more complex methodology (which included an estimate of 'supply side' CO₂ emissions - e.g. associated with manufacturing or other supply increases to meet increased demand generated by the rally – as well as those associated with transport fuel related emissions. This report estimated a figure of 2,355 tonnes of CO₂ equivalent from the 2010 WRGB (which is not hugely different from that calculated by Keen using the more basic method above)⁶⁷. Again, this report concluded that '*spectators accounted for over 80% of the environmental impact in terms of CO₂ equivalents.*'⁶⁸.

Comparisons:

- Ceen (2021) reports that the FIA (motorsport's International governing body) calculated the annual carbon footprint of Formula 1 motorsport as 256,000 tonnes⁶⁹. This was a comprehensive audit (e.g. including development and manufacture of cars) which found that logistics, development and manufacture accounted for 92% of emissions, event operations 7.3% and the competing cars only 0.7%⁷⁰.
- A study calculated that the UEFA Champions League Final scheduled for 30 May 2020 was expected to generate around 8,693 tonnes of carbon emissions⁷¹.

Comments on data

The 2008 Carbon Audit of WRGB is the only dedicated study of carbon emissions that we have identified and we have not been able to secure a copy of the detailed audit. The estimated emissions calculated by Richard Ceen use a transparent methodology to calculate estimated carbon emissions from fuel use only. The 2011 calculations by the Welsh Economy Research Unit provide a more detailed estimate that includes an estimate of non-direct CO₂ emissions.

Links

- WG declaration of Climate Emergency and carbon neutral by 2030 target

⁶³ (Ceen, 2021)

⁶⁴ (Ceen, 2021)

⁶⁵ (Ceen, 2021, p. 5)

⁶⁶ Ibid.

⁶⁷ (Welsh Economy Research Unit, 2011)

⁶⁸ (Welsh Economy Research Unit, 2011, p. 31)

⁶⁹ Ibid.

⁷⁰ Ibid.

⁷¹ (Ceen, 2021)

- Perception of rallying and its alignment with SMNR.
- Visitor numbers
- Motorsport organisations sustainability policies and targets

8. Measures to reduce carbon footprint of rallying

Introduction

This aspect of the system is considered to be important because of the importance of carbon emissions. A number of different aspects of value are relevant under this general heading, namely:

- **Net zero carbon footprint confirmed for WRGB in 2008**
- **By 2022 all top world rally cars will be hybrid – will start to trickle down**
- **Motorsport sustainability targets**
- **WRGB & other motor organisations' sustainability goals and commitments**

These points are together indicative of the value in the system associated with action by motorsport competitors and organisations to reduce the carbon emissions and other environmental impacts associated with the sport and rally events.

Data and evidence

- WRGB was awarded CarbonNeutral® event status in 2008, achieved through internal reductions and external offsetting⁷²
- Cars competing in the World Rally Championship (WRC) will be hybrid by 2022 and Rally 2 cars will be hybrid by 2023⁷³.
- All rounds of the WRC (including WRGB) are required to be accredited against FIA's Environmental Accreditation Programme⁷⁴.
- By the end of 2021 the FIA aims to have developed environmental action plans covering water, air, soil, waste and biodiversity. It will also develop a training programme for member organisations to build their capacity in taking climate action⁷⁵.
- By 2025 all FIA members will be required to reach the top level of FIA environmental accreditation⁷⁶.
- MSUK has a sustainability programme and environmental policy. They are developing an environmental management system⁷⁷.

We asked local rally organisers (local Motor Clubs) about actions or policies they had to help the environment. The 6 local rallies / Clubs that responded reported a range of actions that included⁷⁸:

- Donations for tree planting.
- Money donated to community groups used for a solar panel and wind turbine.
- Rally route checked against known protected / sensitive areas and rare species and moved to avoid any disturbance or harm.
- Forest areas with sensitive habitats / species, cordoned off to protect from spectators.
- Litter collection.
- Recycling and re-use during rally organisation.
- Active attempt to minimise road mileage (and hence disturbance as well as emissions).
- Service area management to reduce pollution and litter.

⁷² (WRGB, WRGB drives towards a sustainable future, web site article:

<https://www.walesrallygb.com/wrgb-drives-towards-a-sustainable-future/>, accessed 20/12/20, 2008).

⁷³ E.g. (Ceen, 2021); <https://www.autosport.com/wrc/news/144104/hybrid-wrc-cars-for-2022-announced>, accessed 08/02/21.

⁷⁴ (Stakeholder interview(s), this study)

⁷⁵ (FIA, 2020)

⁷⁶ Ibid.

⁷⁷ (MSUK, 2021)

⁷⁸ (Local Rally responses to study questionnaire, 2020)

- Competing cars carry environmental and spillage kits.
- Central refuelling station that is run in a controlled and safe way.

One of the responding Clubs reported that they were currently investigating getting accredited via the FIA sustainability programme. Four of the respondents said that they would consider participating in the FIA or other environmental programme in the future and most of these said that they had previously been unaware of the scheme or would need guidance to participate⁷⁹.

Links

- History of adaptation (e.g. R4W; environmental impact management)
- WG declaration of Climate Emergency and carbon neutral targets
- Perception of rallying and its alignment with SMNR
- Governance frameworks and processes (including Master Agreement and governance of environmental impacts)
- Carbon emissions
- High level showcase for sport – inspiring interest and participation

9. Disruption / displacement of forestry and other activities (e.g. other recreation)

Introduction

Rally events require other activities in the sections of forestry in which they take place to cease. This is particularly important for safety reasons. Rally events take place over only a limited number of days in a year, however their co-ordination with other activities, especially tree harvesting and other forestry work, needs careful co-ordination. There is a well developed and managed system of booking times and allocating routes in operation that allows this co-ordination⁸⁰.

Data and evidence

- Rallies require pausing of forestry operations such as harvesting during preparation, rally event and post-rally road repair. Disruption is short-lived⁸¹.
- Rally routes and timings are organised well in advance and so disruption can be planned for⁸².
- A stakeholder interviewee reported that a significant staff cost within NRW is required to co-ordinate rally and other forestry activities (although this was not quantified)⁸³.
- Businesses or others that we spoke to that run other recreational activities in the forest reported that the current levels of rally use were manageable, given that they get good notice of when rallies will be running. Rallies also tend to run out of peak season for other recreational activities. Any significant increase in rallying activity, or any loss of notice, would be disruptive to their businesses as they cannot operate at the same time as rallies⁸⁴.

Comments on data

Data about disruption to forestry operations is likely accurate and representative as it was provided by NRW staff who manage and understand forestry operations. The data about disruption to other recreational activities we collected was limited (we only spoke to one or two people involved in running these activities). However, NRW and local authority staff are aware of complaints and problems that are reported to them and did not report any significant problems in this regard.

⁷⁹ Ibid.

⁸⁰ (Stakeholder interview(s), this study)

⁸¹ (Stakeholder interview(s), this study)

⁸² Ibid.

⁸³ (Stakeholder interview(s), this study)

⁸⁴ Ibid.

Links

- Benefits for, and impacts on, rural communities.
- Sustainable forestry systems.
- Role in whole forestry management systems.

10. Displacement of illegal motorsport activity*Introduction*

Some of the stakeholders interviewed suggested that organised rallying could help displace or reduce illegal motorsports. However other stakeholders questioned this and some even suggested that it might encourage illegal motorsports in the woodland estate⁸⁵. One member of NRW staff informed us that the traditional approach to addressing illegal motorsport activity has considered provision of legal opportunities to participate to be a necessary part of a mixture of responses that also include measures to reduce illegal activity directly such as policing⁸⁶.

Comments on data

Data is missing for this aspect of value and a number of participants in the review suggested that this aspect requires further investigation.

Links

- Perception of motorsports in the woodlands
- Impacts on local communities and other forest users

11. Importance to rural communities*Introduction*

Stakeholders reported a range of positive benefits for rural communities from rallying and a number highlighted the importance of rallying and rally clubs to rural communities, leading to it as being identified as a priority area of value (by NRW staff and then confirmed and emphasised by participants in the multi-stakeholder workshop)⁸⁷. Rallying is reported as important for rural communities for a range of reasons, including⁸⁸:

- Rally Clubs are '*part of the social infrastructure of mid and north-Wales*' (Stakeholder Interviewee), playing an important social role in many communities (e.g. via a shared activity; by bringing dispersed rural communities together; providing a sense of camaraderie; and the social capital they create).
- Rallying contributes to recreational enjoyment
- Skills and capacity building (participants can learn new skills as trained marshals, etc)
- Feelings of pride and sense of importance from hosting events that draw people to rural areas (especially the hosting of the international WRGB event):
'the world comes to rural wales and this has relevance to self-esteem' (Multi-stakeholder Workshop participant)
- Fundraising for local community groups and charities
- Economic benefits for local businesses

Data and evidence

- £266k raised for local charities by WRGB, 2013-2019⁸⁹.

⁸⁵ (Stakeholder interview(s), this study)

⁸⁶ (Elster-Jones, 2021a)

⁸⁷ (Stakeholder interview(s), this study); (Elster-Jones, 2021a) (Elster-Jones, 2021b)

⁸⁸ (Elster-Jones, 2021a); (Elster-Jones, 2021b); (Stakeholder interview(s), this study)

⁸⁹ (WRGB, WRGB Infographic, 2019)

- Rally Clubs and Rallies report that funds from car parking or programme sales are donated to local community groups or organisations (often in return for volunteer help with running the events). Specific benefits reported include⁹⁰:
 - £5,000 going to local community groups from the Cambrian Rally; £1,400 from the Nicky Grist Stages Rally.
 - Specific uses for income from rallying by community groups included:
 - Placing a deposit on a village pub so the community could turn it into a community run pub and post-office.
 - Contributions to a new village hall roof.
 - Purchase of defibrillator and storage case.
 - iPad purchased for school children by a PTA.
 - Kit and contribution to tour costs for football and rugby clubs.
 - Contribution to running costs for First responders.
- Conwy Council participants in the Review reported that rural cabinet members on the Council emphasise the importance of rallies for their communities⁹¹.
- MSUK report that they have received a lot of correspondence from Rally Club members expressing emotional distress because WRGB had not gone ahead and is a high spot for so many people⁹².

Comments on data

This aspect of value is considered important in the system but we do not have any specific, robust, data that would allow us to understand this aspect in detail or e.g. make an objective judgement of rallying's relative importance for rural communities. Questionnaire data from local Rally Clubs provides some detail regarding financial benefits for local community groups.

Links

- Perception of motorsports in the woodlands.
- Impacts on local communities and other forest users.
- Social capital (including volunteers).
- Capacity within the rallying system (e.g. to adapt to new challenges and changes).
- Economic impacts
- Wellbeing

12. Value associated with participation in rallying

Introduction

A range of (often linked) types of value are associated with the participation of people in rallying as volunteers, Club Members or competitors. These accrue at different levels and to different parts of the system, from individuals themselves, through Clubs and communities to NRW and the system as a whole. These include (with specific aspects of value from our priority list highlighted in bold)⁹³:

For individuals:

- Contributions to wellbeing, e.g. through recreational enjoyment, social contact and participation in a group activity (**Participation in event; sense of identity; Recreational enjoyment**)
- Learning skills, e.g. through training and experience marshalling rallies)
- A sense of identity

⁹⁰ (Local Rally responses to study questionnaire, 2020)

⁹¹ (Elster-Jones, 2021b)

⁹² (Elster-Jones, 2021b)

⁹³ (Stakeholder interview(s), this study); (Elster-Jones, 2021a); (Elster-Jones, 2021b)

- Opportunities to visit places (and especially natural landscapes) that would otherwise not see.

For Motor Clubs:

- Club Members and volunteers enable Motor Clubs to hold rallies and other events. Rallies are entirely dependent on voluntary capacity (**Voluntary capacity & collaboration in clubs and between clubs**).

For communities:

- As discussed above, in some rural communities Motor Clubs can be an important component of the social fabric and capital of the community, due to the large numbers of people involved and the relationships between them (**Significant social capital⁹⁴ – volunteers, relationships**).
- As discussed above, rallies can provide important income to community groups and causes (**Economic value beyond tourism and hospitality; Importance to rural communities and economy**).
- As discussed elsewhere, the fact that rallies (and particularly WRGB) attract people to rural locations can be a sense of pride for people living in these communities.

For NRW & WG

- The people involved in rallies represent a significant group of people making use of WG woodlands and deriving benefits from them (**Recreational enjoyment**).
- In addition to the large numbers of people who derive recreational benefits from woodlands via rallying, it is thought that many of the people doing so may not otherwise make use of WG woodlands. I.e. rallies make benefits of woodlands available to people who might not otherwise derive benefits from them (**Woodland for Wales Strategy: real social and community benefits; broaden engagement with woodlands; opportunities and services accessible to all**).

For the 'rallying in WG woodlands system':

- As above, rallies are not possible without the significant voluntary effort and social capital provided by the people involved in Motor Clubs and in putting on the events (**Significant social capital – volunteers, relationships**).
- As well as being necessary to run rallies, the social and voluntary capacity resulting from the people involved helps the system adapt to challenges and changes (e.g. R4W as a solution to increased road repair costs, was developed and made possible by volunteer rally enthusiasts) (**History of adaptation (e.g. R4W; environmental impact management)**).

Comments on data

The evidence that we have presented above was from stakeholder interviews and contributions to the two Workshops. Reliable data is available for the numbers of Motor Club members and volunteers involved in rally events (as presented under the relevant sections). Other data is anecdotal or missing (e.g. detailed data about wellbeing or skills impacts from involvement with rallying). An important dimension here is the extent to which people involved in, or spectating at, rallying represent a distinct audience who would not otherwise visit or benefit from WG woodlands. This is thought to be the case by a number of stakeholders. More evidence on this point would help verify this.

Links

- Social capital.
- Voluntary capacity.

⁹⁴ Social Capital can be defined as: '*the links, shared values and understandings ... that enable individuals and groups to trust each other and so work together*'. (OECD, 2007, p. 102)

- Importance for rural communities.
- Linked to many dimensions of value as the whole rallying system is reliant on Motor club members and volunteers.

13. Capacity and collaboration in and between Motor Clubs

Introduction

As discussed above, Motor Clubs individually and together represent a significant amount of human and social capital built on their members and the voluntary basis for their operation. This is a centrally important dimension of value in the rallying system because it enables events to run successfully and be viable (without significant volunteer input rallies, including the WRGB, would not be viable or possible). Some key aspects of this value include:

- The numbers of volunteers and Club Members – representing a vital resource for rallies to take place.
- The relationships between Motor Clubs, that collaborate to stage rallies.
- The knowledge, skills and expertise held by the Clubs and the volunteers involved. Organisers and other volunteers receive training and accreditation (e.g. from MSUK) in order to safely and effectively carry out marshal and other roles during rallies (**Inter-relationship between Club Rallying and National scale events: the two are symbiotic**).

Data and evidence

- Without the infrastructure of the Clubs and Club rallying it would not be possible to put on a national / international scale event (like WRGB) – due to the numbers of volunteers needed to make it work⁹⁵.
- In the other direction, the training and experience volunteers at the Club level receive from involvement in WRGB is important in developing and maintaining skills, experience and professionalism at the Club level⁹⁶.
- 45 Motor clubs based in Wales with an estimated 2,700 members⁹⁷.
- Wider network of volunteers involved in rally event organisations (see section on volunteering above).

Comments on data

One NRW stakeholder questioned whether this reliance on voluntary competence needed greater consideration and checking by NRW. For example, might this reliance on volunteers represent a risk?⁹⁸ From what the review has learned of the system, volunteer training is carefully and formally managed and marshals are accredited by MSUK, however, this may be an aspect that requires more formal and transparent consideration if this is not already in place.

Links

- Linked to many dimensions of value as the whole rallying system is reliant on Motor club members and volunteers.

14. Networks and relationships

Introduction

The networks and relationships between different organisations and people involved in the rallying in WG woodlands system are essential to the operation and resilience of the system (and hence to

⁹⁵ (Elster-Jones, 2021b); (Stakeholder interview(s), this study)

⁹⁶ Ibid.

⁹⁷ Figures submitted to this Review by the Welsh Association of Motor Clubs (WAMC)

⁹⁸ (Elster-Jones, 2021a)

much of the value that the system generates). Figure 4 shows the different organisations and people involved in the system and some of the many relationships between them (and how these are governed). Some of the important aspects of this dimension of value include:

- The networks and relationships between motorsport organisations (the Motor Clubs and governing bodies) allow collaboration to stage rallies; they also allow training, accreditation and co-ordination of rally volunteers and organisers.
- Networks and relationships provide routes for communication and ways in which changes can be co-ordinated within the system. For example new Health & Safety rules or the adoption of environmental action plans or accreditation.
- Importantly, the networks and relationships within Motorsport enable NRW to reach, engage with and influence a much larger audience than they could directly⁹⁹.

Effective communications and collaboration are important processes in forming and maintaining networks and relationships and allowing them to operate effectively. Effective communication and collaboration are also key to balancing needs of multiple stakeholders, mitigating impacts and influencing change. For example, participants in the Multi-Stakeholder Workshop discussed how good relationships and communication can be effective in managing rally impacts on local communities and residents: issues are usually avoided or more easily dealt with if rally organisers engage with and communicate well with local communities and residents¹⁰⁰. Response to the Motor Club and Rally questionnaire re-enforced this point and provided evidence of specific incidents where rally organisers had worked with local community members to avoid or fix problems¹⁰¹.

Links

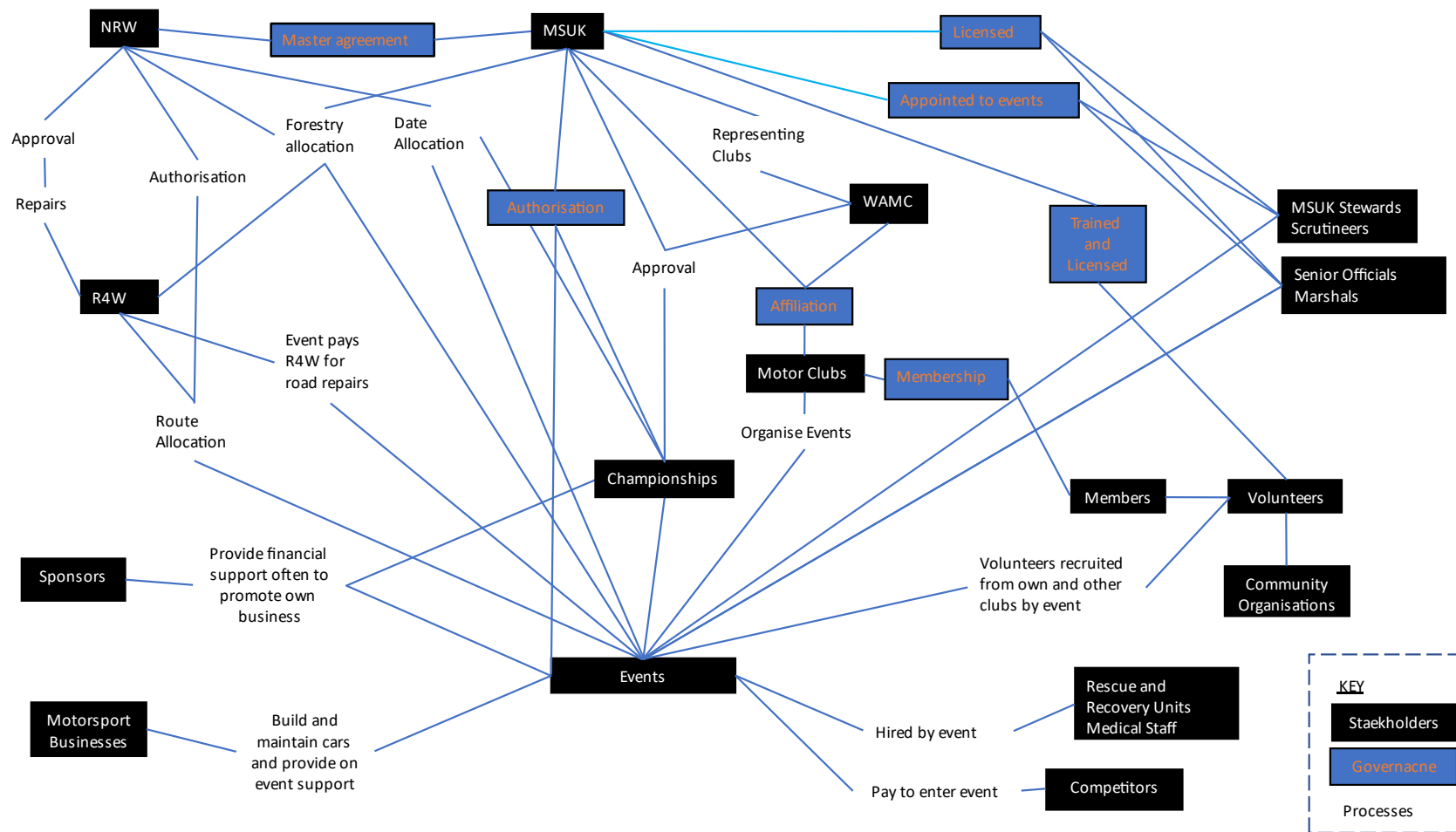
- Networks, relationships - and their operation via communication and collaboration – are linked to many dimensions of value as networks and relationships are foundational to the operation of rallying and the rallying in WG woodlands system.

⁹⁹ Workshop participant, (Elster-Jones, 2021a)

¹⁰⁰ (Elster-Jones, 2021b)

¹⁰¹ (Local Rally responses to study questionnaire, 2020)

Figure 4: The Motorsports in WGWE system: Stakeholders, governance and processes



15. History of adaptation (e.g. R4W; environmental impact management)

Introduction

Evidence collected from stakeholders via the interviews and Workshops described how the rallying in WG woodlands system has changed over time, adapting to challenges and new circumstances. This aspect of value is extremely important in any system as it relates to the system's capacity to change in the future. As discussed elsewhere, SMNR is not a fixed end point, but rather a process and in assessing the alignment of rallying with SMNR we need to consider its alignment with the requirements for adaptive management, preventative action and transformational change that are part of the process of SMNR. We suggest that the system's history of change provides an indication of its capacity to change in the future (along with other aspects such as: the 'coherence of the system' (including extent and functionality of networks and relationships; and the 'direction' of the system as indicated by policies and actions). The importance of this aspect of value was indicated by stakeholder interviewees within NRW, one of whom discussed how evidence of the system's capacity to change and innovate – including how it has responded to previous pressures for change – provides some indication for decision makers that the system could respond effectively to requirements for change in the future¹⁰².

Data and evidence

One interviewee described rallying as '*by its nature, innovative*'¹⁰³. Stakeholders have provided a series of examples of ways in which the rallying system has changed or adapted in the past including¹⁰⁴:

- As described under 'Forestry road use and repair' above, Rally 4 Wales was established in response to a crisis that threatened the economic viability of rally events. The organisation was conceived and developed by rally enthusiasts with the input of considerable amounts of expert voluntary expertise and time. This case demonstrates strongly the capacity and resilience within the system based on the passionate voluntary base for rallying.
- The management of local environmental impacts (as discussed in more detail under the relevant section above) is an area where ongoing work between NRW staff and rally organisers has led to more effective management and greater mitigation and reduction of risks (e.g. see Appendix 2 of the NRW Stakeholders Workshop Report¹⁰⁵ for detailed discussion of this process and its outcomes). This process is ongoing and has continued as a result of specific feedback collected from stakeholders during this review (again, see the relevant section above).
- Health and Safety measures and processes for rallies have been an area where ongoing change and development has taken place in response to incidents and ongoing review.
- Rally cars and their specifications have been adapted regularly to mitigate environmental impacts as well as safety concerns. For example: mudflaps have been adapted to reduce the amount of stone thrown off from roads; Tyre specification have been repeatedly adjusted; The fitting of adhesive film to the inside of windscreens has been mandated to prevent shedding of broken glass.
- Materials used to repair roads have been changed in response to observed advantages and disadvantages.
- Rally events are regularly adjusted and adapted to attract new spectators and maintain their appeal.

Stakeholders gave different opinions about the ability of the system to adapt and change¹⁰⁶.

¹⁰² (Stakeholder interview(s), this study)

¹⁰³ Stakeholder interviewee (Stakeholder interview(s), this study)

¹⁰⁴ (Stakeholder interview(s), this study); (Elster-Jones, 2021b); (Elster-Jones, 2021a)

¹⁰⁵ (Elster-Jones, 2021a)

¹⁰⁶ (Stakeholder interview(s), this study)

- The majority who talked about this described the system as capable of change and adaptation, with the capacity to do so.
- A senior MSUK stakeholder made the point that rallying is able to innovate and change quickly as a result of a number of factors, including: a well-connected and engaged community of participants; the ability of the governing body to move relatively fast in enacting changes; the history of innovation in rallying (e.g. motorsport has historically taken a lead on advancing technologies as they are working with a small number of competing cars, compared to the car manufacturing industry that has to move more slowly): *'because of the size of our community and speed with which we can respond, we can react faster than government and the mainstream motor industry.'*¹⁰⁷
- Interviewees highlighted the importance of key stakeholders in facilitating and allowing change and adaptation, especially the motorsport governing bodies.
- Some expressed concern about potential weaknesses in the governance structures within motorsports in relation to facilitating adaptation (e.g. governance can be quite centralised and so certain actors are key in enacting or blocking change)¹⁰⁸.

Comments on data

As a foundationally important aspect of any system that is working towards SMNR, evidence and understanding about the adaptive capacity of the rallying in WG woodlands system is something that should be considered explicitly as part of any monitoring of the system.

Links

- linked to many dimensions of value as adaptive capacity is foundational to the successful operation of the whole system; and to its ability to evolve to address challenges and achieve greater alignment with SMNR.

16. International profile and showcase for Wales: landscape Plus and High-level showcase for sport – inspiring interest and participation

Introduction

These dimensions of value relate to the profile of WRGB nationally and internationally and the large audience of people that view and engage with it (either directly or via media coverage). Participants in the review highlighted a number of ways in which this aspect of value is important¹⁰⁹:

- Contributing to Wales' international profile and Showcasing Wales' natural landscapes. This exposure is considered to play an important role in marketing Wales to a wider audience, principally as a tourism destination (as discussed under the Economic impact and Visitors sections above).
- Providing a high-level showcase for rallying as a sport, which can help attract new competitors and spectators / viewers. It is essential for any sport that new people join as competitors and member of the public continue to be interested (attending and watching events).

The 'Plus' has been added onto the end of the point about the value of rallying as an international showcase for Wales because a number of stakeholders suggested that it might allow Wales to promote other aspects of itself as well as its landscapes and sporting events, such as the lead it is taking on sustainability¹¹⁰.

¹⁰⁷ (Stakeholder interview(s), this study)

¹⁰⁸ (Stakeholder interview(s), this study)

¹⁰⁹ (Stakeholder interview(s), this study); (Elster-Jones, 2021a) (Elster-Jones, 2021b)

¹¹⁰ (Elster-Jones, 2021b); (Stakeholder interview(s), this study)

Data and evidence ad comments

- WG stakeholders involved with sponsoring WRGB reported that there has been research to interrogate the impact of WRGB on exposure for Wales in different markets. Our review has not been able to obtain detailed reports of this research¹¹¹.
- See data presented under Media Value above.
- The fact that a Welsh driver finished second in the World Rally Championship has the potential to generate renewed and new interest in rallying within Wales¹¹².
- Econactive (2004:61) point out that '*Unlike stadium-based events...*', WRGB showcases Wales' landscape and scenery, which may have a different and wider impact on promoting Wales to visitors.

Links

- Economic impact
- Sustainability of rallying as a sport (related to ongoing recruitment of participants and fans)
- Perception of rallying

17. Perception of Rallying in relation to SMNR*Introduction*

This is an important dimension of value as rallying on the WG woodland estate needs to take place in the context of WG sustainability policies and wider public concern about climate and biodiversity crises. Since rallying is a motorsport it is inevitably associated with carbon emissions. It is also a noisy, 'dirty' sport. Stakeholders participating in this review have described how these aspects of the sport can lead to a negative perception of rallying in relation to the environment¹¹³. This was also a factor in the commissioning of this review as NRW needed to be clear on how their hosting rallying within the woodland estate related to their obligation for SMNR.

Data, evidence and comments

- We were not made aware of any research looking at the perception of rallying among the public or other groups.
- The idea that rallying could have a negative image for some people was widely accepted by stakeholders involved in the review, although many made the point that the perception was not necessarily borne out when the detail of the system's impacts are considered and especially when rallying is compared to other activities (e.g. other recreational activities or forest harvesting)¹¹⁴.
- A stakeholder interviewed for the study reported that there has been a long history of debate and discussion about what activities are 'good or bad' or appropriate in different contexts / land types. A negative perception of rallying can be influenced by 'taste' (in the sociological sense) which is linked to variables such as class. Thus, whether certain activities (e.g. fishing, mountain biking) are seen as wholesome, appropriate or positive in outdoor spaces can be influenced by the class, education and other aspects of the person making the judgement¹¹⁵.

Links

- Carbon emissions.
- Local Environmental Impacts.

¹¹¹ (Stakeholder interview(s), this study)

¹¹² (Stakeholder interview(s), this study); (Elster-Jones, 2021b)

¹¹³ (Stakeholder interview(s), this study); (Elster-Jones, 2021b)

¹¹⁴ Ibid.

¹¹⁵ (Stakeholder interview(s), this study)

- Rallying as a showcase for Wales and motorsport.
- Impacts in context: comparison of rallying with other activities

18. Governance frameworks and processes

Introduction

The various frameworks and processes for governing rallying in WG woodlands enable and facilitate the networks and relationships that are fundamental to the operation of the system and the processes by which different aspects of value emerge from it. They also help determine the resilience and adaptive capacity of the system. As a result, they also provide a mechanism to influence change in the system. Aspects of value from the Stakeholders' Priority list associated with governance include:

- **Governance processes (environmental; H&S; licensing; organisational)**
- **Master Agreement**
- **Governance of environmental impacts (identification, monitoring, reporting, mitigation)**

Data and evidence

Stakeholders involved in the review discussed a wide range of informal and formal governance structures and processes relevant to the rallying in woodlands system, that operate at a range of different levels (and often interact with each other), including¹¹⁶:

- Underlying policies, such as the Environment (Wales) Act and legislation underpinning Environmental Impact Assessments.
- Guidance and principles, such as the SMNR principles or Environment (Wales) Act statutory guidance.
- Structural arrangements that describe and manage the relationship between different stakeholders. Such as the Master Agreement between MSUK and NRW; licensing arrangements between MSUK and local rallies; and specifications for forestry road repair by R4W.
- Sponsorship and funding arrangements and the associated governance, including legal agreements and monitoring and evaluation processes.
- Procedures and arrangements for managing specific aspects of the rallying system, including:
 - Health and Safety (very well-developed processes and rules, including training and accreditation of marshals).
 - Environmental Impact (NRW processes including formal and informal elements).
 - Route allocation (co-ordinated by R4W with a procedure involving applications for routes by rallies and consultation with NRW to identify suitable routes and mitigate environmental impacts).
 - Fuel supply (e.g. usually provided at a single location so risk and environmental impact can be well managed).

Overall, governance is well developed within the system. A small number of stakeholders expressed concern about potential weaknesses in the governance structures within motorsports in relation to facilitating adaptation (e.g. governance can be quite centralised and so certain actors are key in enacting or blocking change)¹¹⁷.

Comments on data

As another foundationally important aspect of any system, evidence and understanding about the way the system is governed, and how this can help the system move towards SMNR, is something that should be considered explicitly as part of any management and monitoring of the system.

¹¹⁶ (Stakeholder interview(s), this study); (Elster-Jones, 2021b); (Elster-Jones, 2021a)

¹¹⁷ (Stakeholder interview(s), this study)

Links

- Another fundamental aspect of the system, related to system coherence, resilience and adaptation as well as many of the other aspects of value in the system (including outputs and outcomes).

19. Policy context

Introduction

This aspect of value is centrally important in any system as it describes the space in which the system can operate and provides impetus and direction for changes within the system. The aspects of value from the Stakeholders' Priority list relevant here are:

- **WG declared climate emergency + commitment to carbon neutral by 2030: Displacing emissions not the answer**
- **Woodland for Wales Strategy: real social and community benefits; broaden engagement with woodlands; opportunities and services accessible to all**

Key aspects highlighted by these choices include¹¹⁸:

- Climate Emergency and the need to reduce carbon emissions as a central focus that the rallying in WG woodlands system must be judged against; and must make progress on, with the target of carbon neutrality by 2030 guiding action.
- The point was made by NRW staff that it is important to be aware of the way in which carbon emissions are addressed as their impact is felt at the global level. Therefore, action that simply displaces emissions is not ultimately effective in addressing climate change (even if it moves emissions from the 'accounts' of any given organisation or system). Specifically, if NRW or WG were to disallow rallying in the WGWE and the activity just moved elsewhere, there would not have been any progress in relation to Climate Emergency.
- The key aspects of the Woodland for Wales Strategy highlighted by stakeholders related to the aim of broadening public engagement with WG woodlands and ensuring that opportunities and benefits from woodlands were accessible equitably. This was considered important as rallying provides a way in which many people make use and gain benefit from woodlands; and (as discussed elsewhere) if it is thought that many people who engage with rallying may not otherwise gain benefit from woodlands.

Links

- Provides the context within which the system must operate and by which it is judged.
- Provides strategic direction.

20. Comparative scale of impacts

Introduction

This aspect of value was considered important by many of the stakeholders contributing to the review as it provides a way of putting rallying's impacts into context and more objectively judging the activity. Comparison provides a way of assessing otherwise abstract measures of aspects of a system's value. As one stakeholder we interviewed put it:

'... can say things are more or less sustainable, but can't say what the final end point is. Absolutes are not appropriate – need to look at process and journey, are you moving in the right direction and seriously enough' Stakeholder interviewee

¹¹⁸ (Stakeholder interview(s), this study); (Elster-Jones, 2021a)

Areas suggested for comparison by stakeholders included¹¹⁹:

- With other forest uses, including recreational (such as mountain biking) and commercial (timber harvesting).
- Comparing WRGB with other major sporting events, although there were not many that were considered particularly comparable (Volvo Ocean Race's Cardiff leg was suggested as well as possibly the Tour of Britain).
- Carbon emissions associated with rally spectators compared to emissions from travel for other recreational activities (such as mountain biking, walking on the coastal path or fishing).
- Participant spending in local area for rally spectators and competitors versus mountain bikers.
- Time dimension of impacts: for rallying impacts are concentrated over a few days around rally events; compared to much more spread out and continuous impacts from timber logging or other recreational activities.
- How other landowners view and interact with rallying.

Comparisons such as these lead to more objective and deeper consideration of how rallying can be assessed against SMNR and forces us to consider how systems interact at different scales and levels. For example, given that the majority of carbon emissions from rallying are from spectator and other journeys to and from events, it then becomes hard to escape the fact that other recreational activities that are generally considered more sustainable also involve car journeys. The challenge is then clarified as one of shifting the carbon intensity of all travel (associated with recreation), rather than just addressing this problem in the context of rallying.

Data, evidence and comments

This review has accessed only a small amount of data that allows comparison with other systems or activities. These are reported under the Carbon Emissions and Economic Impact sections above.

In addition, we spoke to a range of other woodland managers (including Dwr Cymru, Confor and the Woodland Trust). These stakeholders described a range of experiences with rallying and positions regarding allowing rallying on in their woodlands. Some observations include:

- Engagement with motorsports relates to organisational remit and objectives. For example:
 - Dwr Cymru are obliged by OFWAT to maximise visitor use of their woodlands and so see rally events as positive ways of increasing visitor numbers.
 - In contrast, The Woodland Trust have the aim of providing quiet enjoyment of nature and they are already having to consider how to manage the increase in visitor numbers in their woodlands which is becoming problematic on some of their sites. They did not therefore see rallying as a positive activity in the context of their aims and felt that their members are unlikely to look favourably on motorsport events in Woodland Trust woodlands.
 - For Confor, many of their members are trying to commercially manage woodlands and so see rallying in that frame. A number of their members do host rallying and generally look on it positively (the challenge being to manage spectator impact).
- The different organisations are addressing sustainability in their organisations and woodlands in different ways:
 - None are as advanced in this work as NRW
 - They are drawing on a range of standards and frameworks for considering their sustainability, including: The Green Dragon process; UK Woodland Assurance Standard (UKWAS)
 - Assessment and management of environmental impacts from any rallying events involve a range of processes and frameworks including: UKWAS and Detailed assessment against organisational priorities via a license process.

¹¹⁹ (Stakeholder interview(s), this study)

We suggest that key data to collect and comparisons to make would include:

- Data about numbers of participants in mountain biking and other recreational activities in the WGWE, together with any data about the length of car journeys taken to access mountain bike activities. This should allow an estimation of the carbon emissions associated with travel to access recreational activities in the WGWE that could then be compared to the emissions associated with spectator and other journeys for rally events.
- Investigating the comparative disturbance of sensitive species and habitats from large-scale but infrequent rally events, with that from more continuous activities such as logging and other recreational activities.

Links

- Perception of rallying.
- Judging progress against key objectives and targets.
- Considering rallying as part of other wider systems and their transition.

21. Role in whole forestry management systems (NRW and private)

Introduction

This aspect of value refers to the role of rallying in a wider forestry management system. For example, one Stakeholder interviewee described how income from rally testing (where rally teams pay to drive on a similar stretch of forest road to that which they will be competing on to check the set-up of their car) makes a meaningful contribution to the business model of a private sustainable forest management system. Another aspect relevant here is the contribution that rallying makes to the repair of WGWE roads¹²⁰.

Other points made in relation to this aspect of value include¹²¹:

- WG's planned National Forest will be designed to support a wide range of mixed uses and activities, providing benefit via Ecosystem Services to as wide a range of people as possible, from a range of different types of woodlands. This will involve working out ways in which multiple users and uses can be integrated and complement each other.
- Integrating and co-ordinating different forest uses is important in building a sustainable model for forestry management and it was suggested that rallying can play a part as one piece of this jigsaw.

Links

- Perception of rallying
- Comparison to other forest-based activities

22. Some future directions?

Introduction

As discussed, the Revaluation 6 Box framework incorporates the value represented by projected future possibilities. These are not simply aspirations (though they may also be aspirations of some in the system) and are in no way certain predictions of the future. Rather, these are plausible potential directions for a system, based on what stakeholders know about the system (and aspects like the actors involved, its capacity, future plans and observed direction).

¹²⁰ (Stakeholder interview(s), this study)

¹²¹ Ibid.

This aspect of value is important because it provides an indication of plausible future directions for the system. It also provides evidence about the intentions and interests of system stakeholders, by revealing what they think is possible and desirable in terms of future changes and directions.

Evidence

The future directions chosen by Workshop stakeholders to add to the priority dimensions of value were:

- ***A sustainable business model for WGWE***
- ***A sustainable sport, bringing a wider audience into woodlands, generating enjoyment***
- ***Climate and biodiversity neutral, or positive, rallying***
- ***WRGB as a sustainable stage of the WRC: USP = leading the way on sustainability***
- ***SMNR as a process for reflection, learning & change (e.g. review has led to formalising of environmental assessment): SMNR facilitating negotiations and collaboration via a conversation about value***
- ***Redefine value to the local economy – mean something different by good for the local economy***
- ***Closing the gap between different practices: spending time in / caring for forest; and one called rallying***
- ***A change in perception – from dirty old fashioned to positive forward thinking***
- ***NRW & Motorsports working together in collaboration (rather than compliance)***

These potential future directions were projected from evidence provided by Stakeholder interviewees and were discussed by participants in both Workshops. Some of the points made by workshop participants are¹²²:

- Biodiversity net gain should be an aim for all NRW's commercial activity. It could be achieved through improved governance arrangements around environmental impact assessment and/or development and adoption of a suitable standard for motorsports activity (and recreational events more widely perhaps?).
- WRGB as a sustainable stage of WRC – holds the potential to move the system to a positive impact and drive sustainable behaviours more widely
- Given WRGB is a showcase for Wales (especially Wale's landscapes and as a host of an international sporting event), could it also become a showcase for Wales as a sustainable place, an innovator in sustainability and it's SMNR approach?
- Conversations, negotiations and collaboration around value as part of SMNR are happening and are important. As evidenced by this review (both its commissioning and the conversations that have been facilitated by it); and the impact of SMNR on NRW's work more widely.
- Working in a way that engages, and enables collaboration between, multiple stakeholders (as has taken place during this review) demonstrates, and can help communicate, what the SMNR principles mean in practice.
- SMNR requires us to think about the whole system and issues associated with it and this helps make whole system progress – e.g. the review has led to discussions about how to define value to a local economy and has led to consideration of the impact of travel to access all kinds of recreational activities in woodlands and other natural landscapes (not just for rallying).
- When considering how the rallying in WG woodlands system could be optimised, participants in the Multi-Stakeholder Workshop discussed a range of changes they thought desirable and possible, that can be summarised under the following main themes:
 - Reduce CO₂.

¹²² (Elster-Jones, 2021a) (Elster-Jones, 2021b)

- Lead change and bring others with you (e.g. by engaging others, innovating and influencing behaviours).
- Use governance to drive, deliver and monitor improvement (e.g. using the Master Agreement)
- Collaboration and communication are key to change – working together will facilitate more effective change.
- Capitalise on and maximise positive outcomes.

Notably, evidence from our interviews and the workshop discussions and suggestions around how the system could change to optimise value (reduce negative and maximise positive impacts) revealed a notable amount of consensus and agreement – all major stakeholder groups appear to have a similar appreciation of the directions that the system needs to move in to increase sustainability¹²³.

Some of the wider evidence (drawn from interview and Workshop results and researcher observations) relevant to the choice of these specific potential future directions as important aspects of value in the system (representing plausible and desirable future directions) is summarised here¹²⁴:

- The rallies currently have low impacts on woodland ecology and these are well mitigated.
- One rally organiser suggested that Motor Club volunteers may be willing to plant trees if this helped secure the future of their sport in the woodlands.
- There is clear realisation among all stakeholders in the system that the carbon emissions of the events must be reduced going forwards. Specific innovations and policies relevant to this are already being developed (e.g. the introduction of hybrid or electric vehicles; carbon neutral accreditation for WRGB).
- Senior MSUK stakeholders were clear about their commitment to work with NRW and others to take a lead on sustainability within motorsports and make rallying in Wales ‘a *flagship for sustainability and social good in the motoring world*’.¹²⁵
- There is competition among countries to host a leg of the World Rally Championships. Although part of the challenge to secure future WRGB events is related to finance, there is also a need to propose an event that stands out as a draw for competitors and spectators.
- WG and other public bodies in Wales have invested in rallying events (and especially WRGB) over decades, successfully creating an international profile for Wales in the sport (and helping create a Welsh World Champion)
- Wales is increasingly seen, and seeing itself, as a leader in sustainability. Showcasing this leadership internationally alongside Wales’ natural landscapes might be a positive outcome of a motorsports sector that is actively working towards SMNR?
- SMNR needs to contribute to Wales’ Wellbeing Goals and these include ‘a more equal Wales’. Finding and demonstrating ways in which natural resources and SMNR benefit a wide range of people and communities (including lower income or excluded communities) is important if political support for WG’s sustainability agenda is to continue and grow.
- Transformational change in many areas is required to achieve sustainability, addressing climate and biodiversity emergencies while achieving wellbeing for all. This will involve closing gaps between all of our current practices (whether rallying, mountain biking, travel, shopping, farming and so on) and caring for natural systems. NRW will need to engage stakeholders of all kinds with this journey and make use of available relationships and opportunities to do so.

¹²³ (Elster-Jones, 2021b); (Stakeholder interview(s), this study)

¹²⁴ (Stakeholder interview(s), this study); (Elster-Jones, 2021b); (Elster-Jones, 2021a); Researcher observations and expertise.

¹²⁵ Stakeholder interviewee, (Stakeholder interview(s), this study)

- Collaboration and engagement are core principles of SMNR: working together, drawing on perspectives, skills and knowledge from a wide range of stakeholders, is necessary to make progress towards SMNR. Therefore engaging rather than disengaging is likely to be important for NRW in facilitating progress towards SMNR in any system.
- The point about redefining value to the local economy, refers to the fact that exploring rallying's economic impact led participants to consider a number of aspects that weren't initially obvious, including:
 - The many different ways in which rally generates value in local economies (e.g. via contributions to community activities; and via links to local garages and motorsport businesses; as well as via visitors contributing to the hospitality sector).
 - The relationship of rallying to local economies in light of the SMNR aim of contributing to regenerative economies. This requires deeper consideration of local economies more widely, the changes that may be needed to make them more sustainable, and how the rallying system intersects with them (and with this requirement for change). One point discussed, for example, was the extent to which a tourism-based economy is sustainable and regenerative. A significant focus of previous attempts to value the economic contribution of rallying has been on contributions to the visitor economy. The SMNR lens led participants to question whether this was a narrow way of looking at the system and how it could most generatively interact with local economies?
- The points about SMNR as a process for learning that can facilitate collaboration via conversations about value, refer to observations by the researchers and reflection by participants that the requirement for SMNR was actively contributing to learning and change. This is evidenced by the process of this review which has provided a space where the different stakeholders involved with rallying in the WG woodlands have been able to work together to generate a detailed view of the system (bringing together different perspectives and areas of expertise to provide richer insight than any one stakeholder could access alone) and to identify ways in which it might change to better align with SMNR. Using value as a way of expressing the different things that matter in the system effectively provided a framework for articulating, exploring and negotiating the most important aspects of the system (from the point of view of system stakeholders). Specific examples include:
 - Work is being undertaken within NRW to formalise environmental impact assessment and management processes (in response to learning from this review).
 - Senior staff within MSUK have expressed the wish to work alongside NRW to address environmental impacts of rallying and to take a positive lead in environmental technology and solutions.
 - There was a notable degree of consensus and agreement among participants from all the different stakeholder groups involved in the Multi-Stakeholder Workshop, around the key directions that the rallying system needed to take to achieve greater sustainability (and the fact that this was necessary)¹²⁶.

¹²⁶ (Elster-Jones, 2021b)

SMNR Review of Motorsports on the Welsh Government Woodland Estate

NRW Stakeholder workshop, 6th January 2021

Workshop Report

RDI Associates 28/01/2021

The focus of this workshop was to identify priorities within the wide range of value that our study has revealed within the rallying in WG woodlands system. Figure 1 on the next page presents the selection of aspects of value that workshop stakeholders collectively agreed are most important. Some of the key points of discussion around these priority aspects of value are summarised below (this is not a full or systematic report of all of the issues discussed, but summarises some of those that had greatest prominence in the workshop discussions):

- Local environmental impact: low incidents of significant impacts relating to pollution (incl. water), species and habitat disturbance or damage, etc
 - This is an important dimension of value for NRW stakeholders.
 - The point was made that the knowledge of incidents relates to the level of monitoring and reporting. There were some questions about whether all important impacts were sufficiently understood, monitored and managed. E.g. sediment pulses in watercourses due to vehicles repeatedly passing through them.
 - The stakeholders with expert knowledge of this area reported that mitigation of these impacts has improved significantly through positive collaboration between motorsport event organisers and NRW staff. E.g. bridges are now used more often to cross watercourses and there is much better planning and governance processes in place (e.g. one member of NRW staff reported that Wales Rally Cymru have won awards for their water management plans and environmental performance and have a clear Environmental Policy Statement with ‘good aims’). More details on progress and recommendations for further development are available in the detailed post-workshop notes from NRW staff in appendix 2 below.
 - Reporting of pollution incidents is time critical to optimise mitigation and response. This is problematic as focus will be on driver safety, cleaning up immediately obvious spills and moving vehicles if there is an incident, e.g. a crash. How can we balance these things and improve timely reporting and mitigation? (see also notes in appendix 2).
 - One participant asked whether particulate air pollution had been considered and whether this was relevant in the context?
- Carbon emissions are another very important area:
 - Driven by WG declaration of Climate Emergency and commitments to carbon neutral by 2030.
 - The achievement of net zero by WRGB is positive but needs unpacking – especially important to reduce emissions as a priority over offsetting
 - Unpacking the detail of carbon emissions from the rallying system is important – one specific question is the level of emissions associated with quarrying for stone to repair roads. The evidence that the majority of emissions are associated with travel to and from events (not cars participating in the events themselves) is important.
 - Placing emissions from the rally in context is important. The point was repeated has been made throughout our review that emissions associated with other forest uses – e.g. lorries and other vehicles involved in logging; and visitors using woodlands for other recreational uses (often spread out over the whole year, rather than concentrated on a few days as with rallying) – need to provide comparison and context for those from rallying.

- The former point relates to the observation that emissions from rallying are ‘in your face’ – i.e. the perception is of an event organised entirely around carbon emitting cars.
- Motorsport sustainability targets are important – and some participants wanted to understand more detail about them, such as: what do they cover, how robust are they, what are the levels of commitment from motorsport organisations? Post workshop contributions from NRW staff provide some more detail here in relation to Wales Rally Cymru’s Environmental Policy Statement and management plans for environmental impacts (see appendix 2). Evidence from motorsport stakeholders reported elsewhere in the review is also relevant here.
- Income for the Welsh economy (nationally and locally) is important
 - A key contribution from rallying relates to the extension of the visitor / tourism season into a time of year when it is usually quiet for these businesses – i.e. timing is key.
 - Showcasing the Welsh landscape is another key element here (and much harder to quantify)
- Importance for rural communities
 - Motor Clubs in rural mid-wales play an important social role in these communities.
 - Related to the value associated with social capital as well as recreational enjoyment, camaraderie, etc
- Volunteering
 - The high level of volunteering associated with rallying is important
 - This is an opportunity for NRW as they have an aim to work with volunteers more and collaborate and engage external stakeholders and users of natural resources
 - As well as the opportunity to work with volunteers involved in rallying, this contact provides the opportunity for NRW to better access the communities from which these volunteers come.
- Recreational use
 - Important objectives of the Woodland for Wales Strategy include: broadening engagement with woodlands; delivering real social and community benefits; and ensuring opportunities and services from woodlands are accessible to all.
 - Motorsport use helps deliver against these aims. Also, crucially, motorsport activity is a ‘whole different type of activity’ from other recreation uses of the woodlands, which involves a whole different group of people than other activities – i.e. rallying is a way in which a wide audience who may not otherwise derive benefit from woodlands, do so.
- Governance processes:
 - These are essential to managing and optimising impacts in the rallying system.
 - The Master agreement between NRW, MSUK and R4W is important as it sets out criteria and rules to govern the whole system. It is also an important way to articulate and apply any changes that need to be made in the system.
 - Some aspects of governance may need to be made more explicit and formalised. For example, management of local environmental risks has traditionally been achieved through expert knowledge and experience of staff members within NRW, together with existing frameworks such as the permissions process and OGN16 document. This has worked well. However, the review has identified the possible advantage of making these processes more explicit and formalising them (and perhaps consolidating and integrating them) so that they can be applied by new staff members without this length of experience (and experience and expertise is not lost). This includes the way in which impacts are identified, audited and managed. This is work that has already begun as a result of this review and is continuing.
- The history of adaptation in the system
 - This is important and evidenced by e.g. positive progress on environmental impact management

- This is a principle and objective of SMNR and something that NRW needs to demonstrate and also to communicate evidence of. Work with rallying could provide this practical demonstration, helping NRW communicate how they are putting this principle into practice (along with collaboration, engagement, etc).
- Relationships and networks
 - Important in that they provide a route by which NRW can reach a much wider audience – e.g. large number of Motor Club members and volunteers, via NRW's relationship with MSUK and their links to clubs (NRW could not directly interact with all of the clubs, let alone volunteers).
- Further evidence or data were required for a range of different areas of value including:
 - Visitor numbers associated with rallies
 - Comparison between rallying and other forest uses, such as logging or other recreation – including for carbon emissions but also other impacts such as forest road impact and risk to people's health and safety (including level of risk of serious injury or death)
 - Motorsport organisation sustainability policies and targets (as above)
 - Whether organised motorsport activities have any effect on illegal motor vehicle activities in the WG woodlands (positive or negative)
 - Does the reliance on voluntary competence that is implicit in the Master Agreement and the way the rallying system works need greater consideration and checking by NRW?

- Potential for future development

Many of the future directions that were identified as plausible from understanding and evidence about the rallying in WG woodlands system made sense in relation to participants' understanding of the system and NRW's aims and aspirations. Some points emerging from, or picked up on in, the workshop discussion included:

- There is a need for a sustainable business model for the WGWE – how rallying does or does not fit with this will need to be a part of it
- Biodiversity net gain should be an aim for all NRW's commercial activity. It could be achieved through improved governance arrangements around environmental impact assessment and/or development and adoption of a suitable standard for motorsports activity (and recreational events more widely perhaps?).
- WRGB as a sustainable stage of WRC – holds the potential to move the system to a positive impact and drive sustainable behaviours more widely
- Given WRGB is a showcase for Wales (especially Wales's landscapes and as a host of an international sporting event), could it also become a showcase for Wales as a sustainable place, an innovator in sustainability and its SMNR approach?
- The value of SMNR as a process for reflection, learning and change [This is being demonstrated in practice via a review like this]
 - Conversations, negotiations and collaboration around value as part of SMNR are happening and are important
 - As above, working in this way (collaboration between and engagement of multiple stakeholders – as has taken place during this review) – demonstrates the SMNR principles in practice and can help articulate what they mean in practice
 - Thinking about the whole system and issues associated with it helps make whole system progress – e.g. we have had discussions about how to define value to a local economy)
- Scale and level: it was noted by one of the workshop facilitators that the issues being considered are at a number of different scales and levels: e.g. environmental impacts and other outcomes from the system are relevant and can be managed within the context and logic of the system; however if we consider a bigger scale or higher level, then other questions and considerations come into play. Most simply, we need to compare impacts from the rallying system with other activities (systems) such as logging or mountain bike recreation in WG woodlands. We also need

to consider the wider question of travel modes generally (as most carbon emissions from rallying (and probably other recreation in woodlands) come from participant journeys to and from the woodlands. Perhaps even more broadly, do we need to start thinking about what constitutes a sustainable local economy (and e.g. the role tourism plays in this – tourism has good and bad effects). These are issues that are also being considered in the NRW's wider SoNaRR process.

	Visible: Current /	Invisible: Future /
Quantitative	<ul style="list-style-type: none"> £9,87M economic impact for Wales (WRGB) 100,000 + visitors (WRGB) 4,016 Volunteer days (WRGB) £4,540,000 Media value (WRGB) 263.2 miles of forestry road repaired; 1:1.07 ratio used: repaired (R4W, 2017) No sig. records of: toxic spill, pollution, protected spp./ habitat disturbance Net zero carbon footprint confirmed for WRGB in 2008 	<ul style="list-style-type: none"> CO2 emissions – competitors; spectators; whole event; road repair (incl. quarrying) Number and distance of car journeys to spectate Tourism visitors (direct + indirect) + distribution in time (out of season) Motorsport sustainability targets Disruption / displacement of forestry and other activities (e.g. other recreation) Displacing illegal motorsport activity(?) By 2022 all top world rally cars will be hybrid – will start to trickle down
Qualitative	<ul style="list-style-type: none"> Participation in event; sense of identity; recreational enjoyment Significant social capital – volunteers, relationships High level showcase for sport – inspiring interest and participation WRGB key component of tourism economy and strategy for Conwy (hospitality a sig. proportion of economy); Rallies (esp. WRGB) extend visitor season - importance for tourism economies regionally Showcases national landscape of Wales, internationally Perception of Rallying as environmentally negative and out of place with SMNR; Carbon Emissions are 'in your face' 	<ul style="list-style-type: none"> Capacity in car clubs – trained and experienced stewards and other volunteers Governance processes (environmental; H&S; licensing; organisational) WRGB & other motor organisations' sustainability goals and commitments WG declared climate emergency + commitment to carbon neutral by 2030 Woodland for Wales Strategy: real social and community benefits; broaden engagement with woodlands; opportunities and services accessible to all
Relational	<ul style="list-style-type: none"> Voluntary capacity & collaboration in clubs and between clubs Role in whole forestry management systems (NRW and private) Networks and relationships, incl. Motor Clubs, MSUK relationships & governance Master Agreement History of adaptation (e.g. R4W; environmental impact management) 	<p><i>Some future directions?</i></p> <ul style="list-style-type: none"> <i>A sustainable business model for WGWE</i> <i>A sustainable sport, bringing a wider audience into woodlands, generating enjoyment</i> <i>Climate and biodiversity neutral, or positive, rallying</i> <i>WRGB as a sustainable stage of the WRC: USP = leading the way on sustainability</i> <i>SMNR as a process for reflection, learning & change (e.g. review has led to formalising of environmental assessment): SMNR facilitating negotiations and collaboration via a conversation about value</i> <i>Redefine value to the local economy – mean something different by good for the local economy</i> <i>Closing the gap between different practices: spending time in / caring for forest; and one called rallying</i> <i>A change in perception – from dirty old fashioned to positive forward thinking</i> <i>NRW & Motorsports working together in collaboration (rather than compliance)</i>

Appendix 1: Detailed notes from workshop

Calculate breakouts and plenary:

- How robust is the figure for visitors to WRGB?
- Length of forestry roads used is a small proportion of those available; How does this compare with other uses (e.g. logging)
- Risk of negative consequences proportionate to this use of a small amount of the woodlands?
- Human safety, e.g.: what is the increase, if any, in the likelihood of a fatality or serious injury due to rallying on the WGWE?
- Questions around low known incidents of pollution, protected spp. or habitat damage / disturbance:
 - What is the level of monitoring and reporting? These findings depend on monitoring and reporting. E.g. do we know enough about sediment pulses – have we looked for them etc.
 - Reporting of pollution incidents is time critical for maximum mitigation – but this is problematic as focus will be on driver safety, mitigating any spills and moving vehicles if there is an incident, e.g. a crash. How can we balance these things and improve timely reporting and mitigation?
 - Mitigation of local environmental impacts has improved through collaboration between motorsport organisers and NRW staff – e.g. using bridges rather than driving through streams, better planning (see below for detailed expert NRW input on this point*).
 - Is particulate pollution an issue?
- Net zero carbon footprint good, but need to unpack and consider reductions in emissions as priority over offsetting
- What is the contribution of quarrying for road repair to CO2 emissions?
- CO2 emissions are very important
- Tourism visitors bring positives and negatives to an area
- Motorsport sustainability targets – participants would like to see more details and to ensure that they are appropriate and of high standard. See post-workshop comments about Wales Rally Cymru Environmental Policy Statement and water management plans**
- There is a need for careful liaison between different forest users to manage disruption to other activities (logging and recreation)
- The possibility that organised rally events might displace illegal motorsport activity was questioned with one participant considering that they encourage illegal use. This point needs further investigation. Policing and provision (of legal opportunities) will both be part of the picture.
- Income resulting from the rallies for hospitality and other businesses in Wales is important

Calibrate breakouts and plenary:

- **In mid-wales there is a high density of motor clubs and they are important socially for rural communities**
- Community involvement is an important aspect
- Recreational use deserves exploring in more detail; Recreational enjoyment and use - Motorsport delivers against woodland for Wales strategy
- Rallying gives a whole different experience to a whole different audience than other forest uses. Not hunting, fishing, or modern recreation.
- **WRGB is a high-level showcase for rallying and wales: could it become a showcase for SMNR in action? With e.g. improvements to environmental auditing and management, CO2 reduction, etc – linked to the issue of negative perception of the sport.**
- **Showcasing of the Welsh landscape is important**
- **The contribution that rallying makes to extending the visitor / tourism season is key to its value to the economy.**
- Carbon emissions in your face with rallying: how about the number of diesel lorries involved in forestry operations!
- Additional point: the NRW estate is essential in allowing forest rallying to take place.
- Governance processes:
 - it is essential to get these right.

- Link to NRW role and purpose documents; and Welsh Woodlands Strategy
- Some need to be more explicit – e.g. managing local environmental impact and scrutiny and audit trail – this is something that the lead NRW manger has learnt from this process and will take work forward on.
- Social capital – this describes a lot of the benefits local people get from rallying
- WRGB goal to continue to make the event more sustainable – need to ensure this is felt as a serious commitment and made real.
- It is possible to group some of the types of value, including:
 - Camaraderie, participation, sense of identity and recreational enjoyment – all positive wellbeing benefits for people involved
 - Importance of WRGB for Conwy economy and rallies contributing to extending the visitor season – these two are closely linked
 - Perception of rallying as environmentally negative and out of place with SMNR – closely linked to carbon emissions are ‘in your face’

Capacitate breakout and plenary:

- Voluntary capacity – number of volunteers involved: an opportunity for NRW as have aims to collaborate and work with volunteers more, which is a key aim.
 - Also the potential to access whole communities via rally volunteers
- Master agreement is important as this sets out rules government the system; It also needs to capture and apply any changes to the system that are required / desired.
- Within the framework of the master agreement, NRW relies on the competencies of volunteers, who make the system viable – a question was raised about how viable this reliance is and whether this aspect needs to be considered and checked in more detail?
- History of adaptation – linked to point about managing environmental impacts: examples experienced by NRW staff of positive and effective responses by motorsport organisers to issues raised – e.g. requests for water management plans have been met successfully. Also move to clearing rubbish effectively
- The relationship and networks between e.g. MSUK and motor clubs – provide a way for NRW to interact with and get messages to a large number of motor clubs and through these a large, hard-to-reach audience
- There is a theme in the system of learning and adaptation – this is a principle of SMNR; this is an important part of the system and something we perhaps need to demonstrate more – demonstrate and communicate how NRW adapts...(including e.g. evidence of how governance is made more explicit)
- We need a sustainable business model for WGWE – which will need to include how rallying can and cannot take place.
- WRGB as a sustainable stage of WRC – holds the potential to move the system to a positive impact and drive sustainable behaviours more widely
- Can group together: SMNR as a process for reflection, learning and change; conversations about value as part of SMNR; and SMNR enables whole system progress (also linked to redefining value to the local economy):
 - Conversations, negotiations and collaboration around value as part of SMNR are happening and are important
 - These link to principles of adaptation and change – working in this way demonstrates these principles in practice and could help NRW communicate and articulate what SMNR means in practice.
- Can also group a lot about the networks and relationships
- Closing gap between people caring for forest and rallying – change perceptions on this
- Biodiversity net gain (should be an aim for all our commercial activity) - to reflect the nature emergency and our legal requirement under the Environment Act. This could be achieved through improved governance arrangements around environmental impact assessment and/or development and adoption of a suitable standard for motorsports activity (and recreational events more widely perhaps?).

Closing plenary:

- Notable consensus between participants and the different groups
- Strong themes coming out about how system could change
- Process as part of permissions process within NRW – part of old document (OGN16) – did pick up rallying through this. Revising this now and changing to a land management format - so could look at whether can better

capture the processes and assessments. Old permissions form did pick motorsports up. Dave will join this process.

- Scale and level - an important issue: Impacts 'within' the rallying system can be managed – these are operational; At a bigger scale / higher level, other considerations come into play – e.g. questions around a tourism economy; working to net zero carbon emissions; behaviour change; travel modes, etc.

Appendix 2: Additional detailed expert input on environmental impact management

Over the last 5 years there has been a general improvement in planning and preparation to reduce the risk of water pollution from rally. These include

- Where possible using bridges to cross rivers and the building/ creation of offline water feature to enable a "splash feature" which is not impacting on the wider environment
- At high-risk sites (e.g. Alwen- drinking water supply), before the rally event take place identifying all pathways (streams/ditches) that flow into the lake and placing mitigation, brash bundles oil boom, before the event, so if there is a spill or build-up of sediment from the event, the risk of it going onto the lake is greatly reduced. These are the points are then all checked and build-up of material cleared before the brash is cleared.
- Grab bags in marshal cars and at all stages
- Refuelling points, information on where these are, volume of fuel and drainage points identified, before event so we know which drains need to be sealed in event of a spill- linking with Fire service and the EPU Tenders (Environmental Protection Units- tenders which are kitted out to deal with environmental incidents), so we have the right kit in the right place to deal with an incident (we have 3 EPU in North and Mid, Holyhead, Wrexham and Newtown)
- Having staff on call, that live close to the site and prepared to attend any major incidents- so they can be attended and impact limited
- Briefing note to all EM staff to we know how to get to an incident safely should we need to attend a major incident.

Things I think could still be improved

- More local input into the choice of route- we have miles of forest track does the rally need to drive along tracks which go into a drinking water reservoir?
- Minimise the number of crossing points where cars are going through rivers, as while one car might only have a minimal impact 140 going through at speed will have a greater / possible significant impact. I know a study was carried out in the wye catchment looking at impact but could be ask WRGB to look at deploying sonde's (water quality passive monitors) to measure the impact and possible carry out invert samples? Then we would have a greater evidence base
- Reporting of incidents – as mentioned on Wednesday in the event of a crash or spill the first concern is for the driver, the co- pilot and then any spectators which might have been injured, any pollution is an after-thought as such does not get reported to us in a timely manner to be able to assess impact. Quite often they are reported as Health and Safety incidents rather than pollution incidents.
- WRGB to proactively assess the whole route in term of risk and place mitigation and have checks at all major pathways on the route, not just around the high-risk receptors.

Environmental impact management within motorsport organisations:

- Wales Rally Cymru has won awards for its water management plans and environmental performance. The water plans serve an important purpose, to protect water quality. Particularly drinking water supplies. Getting the first plans in place was not easy. It started out as a compliance exercise. But the result was very positive.
- Now that these plans are in place and Wales Rally has seen their benefit in terms of protecting the water environment (and in terms of enhancing the good reputation of the rally) I hope that we can shift to a more collaborative approach where Wales Rally is proactive in coming to NRW with its Water Plans to protect Wales' water environment beyond the drinking water resource.

- Wales Rally Cymru have a clear Environmental Policy Statement (EPS) and have clear stated aims within it. They are rightly proud of their performance against these stated aims. I think NRW should be actively working with Wales Rally Cymru as they develop and refine this EPS and the stated aims.
 - Here are the specific aims at present.
 1. to minimise impact on ground and water contamination as a result of the service park (Rally Village) activities;
 2. to take steps to minimise the number of printed tickets and rally documents in favour of electronic documents;
 3. to minimise the impact of vehicles and fuel consumption used to administer the event.
- These are good aims. And they sit within an EPS that outlines many good management practices for environmental matters (dated 2018 on their website). As part of the EPS is a general statement along the lines that WRC “*will seek to minimise the impacts on noise, air, biodiversity and cultural heritage where possible*”. Along with statements about minimising water usage and managing wastes. Which are all good things.
- From the NRW water environment perspective the Rally Village aspects are prioritised by WRC and are well addressed to avoid ground and water contamination. Water is missing from the general statement in italics above, which strikes me as a genuine oversight. This may explain why securing the first water management plans to protect the water environment along the course, away from the Rally Village, was hard but ultimately very successful work.
 - Water plans and the other basics of environmental management should ideally become commonplace and part of “how we do things around here” and fit within the context of the Wales Rally Cymru EPS and its aims.
 - **Recommendation:** NRW to appoint a lead to work with WRC on their EPS as part of our broader corporate engagement with them, and for WRC to promote the EPS to their staff as a key component of how they work with NRW and setting the context for collaboration rather compliance. The rest should flow from that.
 - **General observation:** The best environmental outcomes come when the regulator and regulated are of a similar mindset. We see this when commercial companies sign up to the higher tiers of environmental standards, or when land managers embrace land management practices that deliver good commercial and environmental results. Everyone wins and the relationships are collaborative, positive and always professional since the regulated and regulator roles are still there. The focus is often on the regulated party coming forward in this scenario, in truth the regulator also needs to pitch in and commit to this way of working. This contrasts with a regulator and regulated situation where minimum compliance is the aim. This is hard work for both parties.

Biosecurity

In addition, we received the following detailed submission relating to **INNS and biosecurity** from an NRW staff member, earlier in the review:

SMNR review of motorsports in WGWE – biosecurity

Any human activity can accelerate the introduction, spread and establishment of pests, diseases and invasive non-native species (INNS). This can result in significant risk for human, plant and animal health and can have considerable economic consequences.

As Wales’s largest environmental body, Natural Resources Wales need to keep biosecurity at the forefront of all that we do. NRW has legal obligations under Plant Health and INNS legislation, as well as a moral responsibility to ensure that we don’t spread disease, pests or INNS. The NRW biosecurity policy (attached) sets out our position in regard to our staff and the work that we do. It applies to all NRW staff, contractors, volunteers and to organisations and individuals who undertake activities on behalf of NRW. It also applies to organisations or individuals we fund to undertake activities or projects and to the advice we give.

Any activity undertaken on our land must take account of biosecurity risks, and mitigation measures must be put in place. Information on how to assess biosecurity risks, simple steps to reduce risks and specific measures for medium and high-risk activities can be found on the [Gov website](#) (tree health information) and the [GBNNS website](#) (invasive species). Our Tree Health team have produced a risk assessment template (attached) to help the organisers of

events on our land to understand and mitigate the risks on site and those posed by the activities. There is also further information on our [website](#) on how to practice biosecurity in woodlands.

Information on the location of plant and tree specific pests and diseases is available on the [Defra website](#). Information about the location of invasive non-native species (INNS) of importance to Wales, is on the [NBN Atlas Wales INNS Portal](#) (a [guide](#) on how to use the portal is available).

This [presentation](#) was given to Wales Rally GB a few years ago, it is focussed on *Phytophthora ramorum* but the biosecurity principles apply to all tree disease, pests and INNS and it sets out the background to tree health and biosecurity concerns in Welsh woodlands.

It is possible to put in place mitigation measures to prevent the spread of diseases, pests and INNS. These need to be considered in the planning stages of events as part of the risk assessment. It is vital that organisers liaise closely with local NRW forestry and land stewardship teams in this planning stage.

The main biosecurity risks are that competitors, the organisers and members of the public who have come to watch the rally:

1. Introduce invasive non-native species (INNS) pests and diseases to the area from other locations
2. Move any INNS pests and diseases located along the rally route to new areas.
3. Transport INNS, pests and diseases they have picked up on the rally back home to where they live.

The risk of competitors and organisers accidentally spreading INNS pests and diseases to and from the rally route can be dealt with by ensuring that participants and organisers clean their vehicles thoroughly and allow them to dry out before they enter the race/help set up the race. They will need to pay particular attention to wheel arches and the underneath of the cars. This could be outlined in the joining pack sent to participants before they arrive, and in any briefings at stages. A washing station could be set up at the stage to ensure this was complied with, although this would need to meet certain environmental requirements, including ensuring that any runoff does not drain into a watercourse.

Key biosecurity measures would include:

- Understanding where diseases, pests and INNS are already known to be. Note that biosecurity is needed at and between **all** stages not just those where an invasive non-native species (INNS), pest or disease has been previously identified.
 - High risk areas should be avoided if possible or visited last along the route so that you start at “clean” sites, moving to the most risky sites last.
 - Consider excluding spectators from high-risk areas if it is not possible to reduce the risk to an acceptable level
- Do not move mud, foliage or water from infected sites
 - Provide hard standing for spectators, organisers and marshals to park on
 - Where possible do not take access vehicles off stoned/hard roads
 - Ensure viewing areas are hard standing
 - Provide signage for spectators (and facilities if necessary) for washing boots where hardstanding is not available [Keep It Clean](#)
 - Keep roads clear of mud and plant and tree debris
 - Ensure competitors and organisers vehicles are cleaned on site

- Engage with road repair contractors post event to ensure good biosecurity
 - Ensure all plant, equipment and PPE is clean and dry before coming to site, and before leaving again. This may include disinfection if identified in the risk assessment as appropriate.
 - If possible, stay on established forest tracks and don't move mud, leaves or water around the site.
 - Restrict the equipment taken onto a site, take only what is needed for the task. Ensure all tools and equipment are clean, serviceable and free from organic debris.

SMNR Review of Motorsports on the Welsh Government Woodland Estate: Refining priorities and exploring change

Multi-Stakeholder workshop, 18th January 2021

Workshop Report
RDI Associates 29/01/2021

We ran an online workshop for the wider group of stakeholders engaged with the review to:

- Review and iterate priority points of value identified by NRW stakeholders, to provide a wider perspective from other stakeholders (including identifying any points that other stakeholders thought were missing from the NRW priority list and any of the NRW priority points that should be emphasised).
- Consider how different potential changes to the rallying in WG woodlands system might change the value in the system (and what changes might act to optimise value).

16 participants took part in a two-hour online workshop using the Microsoft Teams platform. Participants were provided in advance of the workshop with lists of the priority points of value identified during the NRW workshop, together with some comments and questions to prompt reflection.

Figure 1 on the next page presents the selection of priority aspects of value that workshop stakeholders collectively agreed are most important (building on the selection identified during the NRW workshop). Appendix 1 shows the full set of notes recorded from the workshop. Some of the key points of discussion around these priority aspects of value are summarised below:

What is missing or needs emphasis?

- Economic impacts:
 - Sports tourism is an important area but hard to quantify (there is evidence from other events such as Tour of Britain)
 - The international profile and showcase for Wales is a central aspect here
 - Benefits to the visitor economy are not confined to Conwy – also felt in other local authority areas
 - Impacts on businesses other than tourism are important – e.g. small but significant motorsport business sector in Wales
 - Media value is important and needs more emphasis / detail, including:
 - E-Sports (use of Welsh landscapes in motorsport Games)
 - Worldwide reach
 - A different audience are reached than via other media promotion for Wales
 - Don't underestimate the value of Image
 - Impacts associated with advertising – many motor manufacturers have made advertisements in the Welsh landscape following form WRGB – e.g. MG, Volkswagen, Land Rover Defender – all filmed advertisements on the Orm.
 - Reports that R4W delivers net improvement to WGWE roads – is there evidence for this: Could be a contribution to a sustainable business model for WGWE?
- Benefits for rural communities
 - These are evidenced by cabinet members from these communities in Conwy who emphasise the importance of rallying for their communities
 - Part of this benefit relates not to economic impact but to feelings of pride and being important to a global event – the world comes to rural wales and this has relevance to self-esteem

- Also, the benefits of camaraderie, social capital and participation in an activity people enjoy
- MSUK reported having significant amounts of correspondence when WRGB did not take place in 2020, with fans and club members expressing emotional distress at the loss of the event that is a high spot for so many people
- Having a Welsh World Champion in any sport is a significant achievement – for the nation, communities, etc. This has been achieved as a result of the rallying in WG woodlands system.
- CO₂ Emissions
 - Important to think about emissions displacement: there is no benefit to climate change if the Welsh stage of WRC or other rally events simply move to other venues (within Wales, UK or internationally). So NRW / WG could reduce emissions associated with the WGWE with no rallies, but this is simply exporting / displacing the emissions if the events continue elsewhere
- Relationships and communication are very important
 - the more people feel part of an event, the more successful the relationship with the community and the easier it is to manage issues and avoid or deal with problems
 - the key to reconciling different needs, opinions and objectives will always be effective communication
- Need to bear in mind trade-offs and different perspectives
 - E.g. could promoting Wales as an international destination for motorsports affect its perception as a destination for eco-tourism?
 - Differences between NRW objectives and Objectives at the Wales scale?
 - A decision or activity can be seen differently by different groups – perceptions and communications will be key to avoid negative perceptions following from any motorsports in the WGWE
 - Potential opportunity costs – e.g. what could NRW resources that support rallying be used for otherwise?
- There is an important symbiosis between Club level Rallying and a national event like WRGB.
 - Without the infrastructure of the Clubs and club rallying it would not be possible to put on a national / international scale event – due to the numbers of volunteers needed to make it work
 - In the other direction, the training and experience volunteers at the Club level receive from involvement in WRGB is important in developing and maintaining skills, experience and professionalism at the Club level.

Scenarios: What might change if WRGB, or all rally events in the WGWE, were lost?

- Economic impacts:
 - WRGB would reduce motorsport business income by a significant amount – one business owner reported that WRGB accounted for less than 10% of the business, but this was an important part of his business.
 - For tourism / visitor economy, WRGB is the most economically significant – one participant suggested it could account for possibly as much as 80% of economic value. Small hotels had reported losing around £15,000 with no WRGB. The Cambrian Rally also does deliver good economic value
 - Conwy Council have been building up their events programme over 10 years to the point where they now have a full programme of events covering 11.5 months of the year. They have a very strong events programme, second or third to Cardiff and possibly Swansea, in Wales. Losing events is obviously not what they want to see. WRGB is an important event in their calendar.

- As above, the point about symbiosis between WRGB and Club Rallies was made – if Club scale rallies were lost, it would not be possible to put on an event at the scale of WRGB in the future as the 1000s of people needed would not be available.
- Participants suggested that if rallying moved out of WG woodlands, then there would be loss of the scale / efficiency benefits that come from managing events under a single agreements and governance system on a single 'estate'. There could also be a reduction in professionalism and expertise, especially around the detailed management of environmental impacts (as NRW has this expertise at a very high level).
- The loss of WRGB would change the economic model for R4W – which repairs roads after allies – and made its economics challenging. Accommodating this change would need some consideration.
- Uncertain trade-offs and system linkages
 - If changes were to happen, then there would be possibly both positive and negative consequences – e.g. possibility for reduced Co2 emissions (though see displacement point above) or environmental impacts; reduction or loss of economic benefit; etc. It is hard to weigh up these different impacts
 - As we can see from different points, many of the elements of value in the system are linked – hence, it is not as simple as choosing to remove negatives and enhance positives.
- Engaging vs. disengaging
 - The point was made a few times that being involved with an event or system means that an organisation has a better chance of influencing its direction. Remaining engaged was thought on balance to be 'worth it' as WG would have more control over what happens in the system than if they were not.
- Rallying would likely continue
 - Participants felt that there is enough interest and involvement with rallying that it would continue to take place but just move elsewhere if it was disallowed on the WGWE: with more tarmac rallying and gravel rallying in private woodlands.
 - If WRGB does not take place, it was suggested by participants that there was a high chance that local rallies may take its place.
- Loss of community value. As reported above, there is good evidence that the rallies hold a lot of importance and provide important social and wellbeing benefits to a large number of people. This value would obviously be lost or reduced with a loss of rallying. It is unclear what proportion of this value is associated with WRGB, but it seems that this event does provide positive self-esteem type benefits for rural communities. The core social capital and camaraderie benefits are probably associated as much, if not more, with the smaller rallies and Rally Clubs.

Optimising the rallying in WG woodlands system

The workshop discussions and suggestions around how the system could change to optimise value (reduce negative and maximise positive impacts) demonstrated a notable amount of consensus and agreement – all major stakeholder groups appear to have a similar appreciation of the directions that the system needs to move in to increase sustainability. Some of the key themes or directions for change emerging from the discussions were:

- Reduce CO2
 - Move to alternative fuels already taking place and being discussed, e.g. WRC bringing in hybrid cars
 - Changes in fuel technology are expected to filter down through the rally system and also the technology will filter to consumer vehicles eventually. This is a slower process than changing the fuels used by competing cars
 - It is important to consider direct and indirect emissions; and as before consider displaced emissions
- Lead change and engage others to bring them with you and change behaviours

- Rallying could lead the way of shift to alternative fuel cars (sport is able to make change – and mandate change – much more quickly than the industry can as they have to work at the pace of consumers)
- Fans and Motor Club members could be accessed with communications and engagement; and influenced by changes at the high level of the sport
- The idea of rallying events as a showcase for SMNR and NRW putting SMNR remit into practice. National level events could act as a showcase for sustainability in Wales
- Use governance to drive, deliver and monitor improvement
 - Master agreement, - reviewed every 5 years so provides a mechanism for ongoing adaptation and improvement and also regular check that it is covering what it needs to, to drive improvement.
- Collaboration and communication are key
 - As above, communication is important in managing multiple stakeholders, resolving problems and making progress
 - As in Workshop 1, greatest progress usually made via collaboration rather than forcing compliance
 - Rallying networks potentially allow NRW to engage and work with a large audience (and one that may not usually be accessible to them)
- Capitalise on and maximise positive outputs and outcomes

Table 1: Priority Value (additions or emphasis added by Multi-stakeholder workshop participants in **bold**)

	Visible: Current /	Invisible: Future /
Quantitative	<ul style="list-style-type: none"> £9,87M Economic impact for Wales (WRGB) 100,000 + visitors (WRGB) 4,016 Volunteer days (WRGB) £4,540,000 Media value (WRGB) 263.2 miles of forestry road repaired; 1:1.07 ratio used: repaired (R4W, 2017) No sig. records of: toxic spill, pollution, protected spp./ habitat disturbance Net zero carbon footprint confirmed for WRGB in 2008 	<ul style="list-style-type: none"> CO2 emissions – competitors; spectators; whole event; road repair (incl. quarrying) Number and distance of car journeys to spectate Tourism visitors (direct/indirect) + distribution in time Economic value beyond tourism and hospitality Motorsport sustainability targets Disruption / displacement of forestry and other activities (e.g. other recreation) Displacing illegal motorsport activity(?) By 2022 all top world rally cars will be hybrid – will start to trickle down Importance to rural communities and economy
Qualitative	<ul style="list-style-type: none"> Participation in event; sense of identity; recreational enjoyment Significant social capital – volunteers, relationships High level showcase for sport – inspiring interest and participation WRGB key component of tourism economy and strategy for Conwy (hospitality a sig. proportion of economy); Rallies (esp. WRGB) extend visitor season - importance for tourism economies regionally International profile and showcase for Wales: landscape Plus Perception of Rallying as env. negative & out of place with SMNR; CO₂ Emissions are ‘in your face’ Events need to use natural landscape where no other infrastructure (e.g., stadiums) 	<ul style="list-style-type: none"> Capacity in car clubs – trained and experienced stewards and other volunteers Governance processes (environmental; H&S; licensing; organisational) WRGB & other motor organisations’ sustainability goals and commitments WG declared climate emergency + commitment to carbon neutral by 2030: Displacing emissions not the answer Woodland for Wales Strategy: real social and community benefits; broaden engagement with woodlands; opportunities and services accessible to all Comparative scale of impacts: Rallying & other activities
Relational	<ul style="list-style-type: none"> Voluntary capacity & collaboration in clubs and between clubs Role in whole forestry management systems (NRW and private) Networks and relationships, incl. Motor Clubs, MSUK relationships & governance Master Agreement Governance of environmental impacts (identification, monitoring, reporting, mitigation) History of adaptation (e.g. R4W; environmental impact management) Effective communications and collaboration key to balancing needs, mitigating impacts, influencing change Inter-relationship between Club Rallying and National scale events: the two are symbiotic 	<p><i>Some future directions?</i></p> <ul style="list-style-type: none"> <i>A sustainable business model for WGWE</i> A sustainable sport, bringing a wider audience into woodlands, generating enjoyment <i>Climate and biodiversity neutral, or positive, rallying</i> WRGB as a sustainable stage of the WRC: USP = leading the way on sustainability <i>SMNR as a process for reflection, learning & change (e.g. review has led to formalising of environmental assessment): SMNR facilitating negotiations and collaboration via a conversation about value</i> <i>Redefine value to the local economy – mean something different by good for the local economy</i> <i>Closing the gap between different practices: spending time in / caring for forest; and one called rallying</i> A change in perception – from dirty old fashioned to positive forward thinking NRW & Motorsports working together in collaboration (rather than compliance)

Appendix 1: Workshop notes

- More detail on comparative scale: It is important to consider the scale of rallying activities in comparison to other activities in WGWE. Rallying may have a high-profile impact but in comparison with forestry management generally, it is at a small-scale time and space-wise. E.g. They are managing 4-5,000ha blocks of forest and timber operations involve 28,000 lorry journeys through the forestry per year, carrying 77,000m³ of timber.
- More details on records of environmental impacts. There are records of the impacts via Habitat Regulation Assessment processes – there are internal processes in place and assessment has been carried out.
- NRW staff have carried out a review of the fit between UK Forest Standards and SMNR and Forest Plans are vetted using the UKFS.

What is missing / what to emphasise: Plenary

- International profile of Wales as a result of WRGB
- Need more data about CO2 impacts
- Sports tourism – a real benefit but hard to quantify. We have evidence for other events e.g. Tour of Britain
- More on Media value – extra dimension of E-Sports; Worldwide coverage; Reaches a different audience
- [Copied from scenarios notes as also relevant here] Also income from advertising that follows from the WRGB – e.g. MG, Volkswagen, Landover Defender – all filmed advertisements on the Orm.
- Don't underestimate the value of Imagery – real life, media coverage and even e-games
- In the Cabinet in Conwy Council, rural members emphasise the importance of rallying to the rural economy, which goes beyond tourism – some people are negatively affected by events but overall the impact is positive and valued
- [Copied from Scenarios breakout notes below – relevant here] MSUK has had significant amounts of correspondence ('mailbags full of letters') from fans and club members saying that they are emotionally distraught at the absence of the WRGB event, describing it as the heart of their community. It is a high spot for tens of thousands of people. This importance can be underestimated – a World Championship event coming to rural areas of Wales is important for local self-esteem.
- Benefits to the visitor economy are not confined to Conwy
- There is a small but significant motorsport industry in Wales
- Impacts on businesses other than tourism – motorsport businesses, etc
- There remains the potential for new innovative classes of vehicle or types of event. And the potential for extra events to be slotted into the calendar.
- Need to bear in mind trade-offs and different perspectives:
 - e.g. might promoting Wales as an international destination for motorsports effect its perception as a destination for eco-tourism?
 - Might 'Is this something for NRW' be different from 'Is this something for Wales?'
 - Potential opportunity costs – what could NRW resources that support rallying be used for otherwise?
 - Leading change is important, but need to be aware of potentially different perspectives / messages: "if these top rally drivers are reducing emissions then I will too" - but it also cuts both ways and depends crucially on perceptions and successful communication, e.g. "if NRW is allowing this damaging activity in these woods then I'll damage them too". NB: I know that's simplistic but hopefully illustrates the point.
- The key to juggling different opinions/objectives will always be effective communications.
 - E.g. The more a community feels part of the event the more successful the relationship with the community is (e.g. managing complaints etc)
- [Copied from scenarios notes as relevant here also] Having a Welsh World Champion is a big thing and comes from the Welsh rallying system
- [Copied from scenarios notes as also relevant here] If you don't have the infrastructure of Club rallying, you couldn't put on WRGB – it involves 1000s of individuals to put the event on and this requires the infrastructure of the Clubs: there is a symbiosis between the two
- Anecdotal reports that R4W repairs lead to a net improvement to forest roads – is it possible to investigate or evidence this?

Scenarios breakout and plenary

- In somewhere like Conwy, we don't have any events infrastructure so need to make use of what we have – i.e. the landscape / great outdoors
- Loss of WRGB would reduce motorsport business income by a significant amount – less than 10% of the business, but an important chunk.
- MSUK has had significant amounts of correspondence ('mailbags full of letters') from fans and club members saying that they are emotionally distraught at the absence of the WRGB event, describing it as the heart of their community. It is a high spot for tens of thousands of people. This importance can be underestimated – a World Championship event coming to rural areas of Wales is important for local self-esteem.
- Being able to be involved in planning an event can help reduce impacts and allow for mitigation. If rallying takes place on WGWE roads then NRW can work closely with organisers; If were to move to private woodland estates then NRW would be removed from the planning and mitigation process and so impacts are likely to be worse.
- Economic loss would be obvious; reduced CO2 obviously a positive. Hard to weigh up the losses and gains.
- Local community interest and value at the local level is key and on the whole positive
- Having a Welsh World Champion is a big thing and comes from the Welsh rallying system
- Feeling part of something bigger is important to Welsh rural communities
- It is 'gut wrenching' to think that world class rallying may be lost from Wales
- Economically, WRGB is the most significant – possibly as much as 80%. Small hotels have reported losing £15,000 with no WRGB this year. The Cambrian rally also delivers good economic value.
- WRGB place in Conwy events programme – have been building their programme up over 10 years to the point where they now have a full programme of events coving 11.5 months of the year. They have a very strong events programme, second or third to Cardiff and possibly Swansea in Wales. Losing events is obviously not what they want to see.
- Also income from advertising that follows from the WRGB – e.g. MG, Volkswagen, Land Rover Defender – all filmed advertisements on the Orm.
- If you don't have the infrastructure of Club rallying, you couldn't put on WRGB – it involves 1000s of individuals to put the event on and this requires the infrastructure of the Clubs: there is a symbiosis between the two
- If WRGB is lost the economic model for R4W would be challenging and this would need consideration
- If WRGB was lost: 2 dimensions – remove the hassle of dealing with large numbers of spectators and problems with complaints; Balanced with the loss of emotional benefit for local people.
- Question of disengaging with rallying altogether – the conclusion was that remaining engaged is 'worth it' – WG has more control over how the activity is managed compared to if it were to move to private woodlands. The camaraderie and the large impact of relationships – hard to quantify but would be lost.
- Loss of WRGB: The scale of impacts in the 'top left' box would significantly reduce, international profile of Wales would reduce especially.
- Linkages in the system: loss of WRGB would call the business model (e.g. R4W) into question; there would be an erosion of relationships between MSUK and local rallies and between NRW and MSUK; There could be a possible threat to standards without the training and processes from WRGB
- Loss of WRGB: high chance that local rallies may step into the space left by WRGB – but still loss of profile and issues around standards and sustainability.
- If No rallying on WGWE: There is enough impetus for rallying that it would move elsewhere, with perhaps more tarmac events and gravel rallying in private woodlands. This could lead to a loss of scale benefits (efficiency) that come with operating all within the NRW woodlands; and potentially professionalism (especially detailed management of environmental impacts).
- Need to be aware of emissions displacement. If emissions reduced in relation to e.g. WRGB, but a different stage happens elsewhere in UK or globally, emissions have not been reduced, just displaced / offshored. [link to point about SMNR forcing consideration of different system scales – not just about accounting for impacts under direct responsibility of NRW or WG, but actually reducing emissions in the bigger system].

- Intangible social benefits in rural Wales: the world comes to Wales which contributes to people's emotional wellbeing and the social fabric, in rural communities
- Symbiosis – WRGB and Club Rallying – the two things feed off each other. If no local club rallies on the woodland estate, then viability of the national event would diminish (ability to host it in the future)
- Better to be working with something than not involved when it is happening elsewhere

Optimising: breakout group and plenary:

- Changing fuel in rally vehicles:
 - 2023 moving to hybrid
 - Will effect spectator journeys too – as technology filters down to consumer vehicles
- Timescale – in 25 years' time could be moving towards zero emissions
- Promoting environmental improvements via rallying could help others – including the public – change their behaviour
 - Will help move the industry and bring people with them
 - [From Dave Richards interview] Rallying is in a position to lead the motor industry (which has to move more slowly because consumers move more slowly and consumer vehicle turnover slower)
- Master agreement, - reviewed every 5 years so provides a mechanism for ongoing adaptation and improvement and also regular check that it is covering what it needs to, to drive improvement.
- Highlight the need for good communication:
 - If have a complaint about the rally – when in communication and dialogue between rally organisers and communities at the ground level, helps resolve issues. Rally volunteers will go and talk to people concerned to resolve the issue
 - Even when the majority of people are enjoying or benefitting from an event (rallying or a Tom Jones concert) if 1 person is unhappy this can cause problems – engaging and talking is a good way to resolve problems.
- Important to maintain and enhance and capitalise on the positive quantitative value.
- Themes, Directions:
 - Reduce CO2
 - Lead change and engage others to bring them with you and change behaviours
 - Use governance to drive and monitor improvement
 - Collaboration and communication are key
 - Capitalise on and maximise positive outputs and outcomes
- Potential to make the sport more sustainable
 - Alternative fuel cars (hybrid) – the motorsport industry is linked into showrooms. Transitions to different fuels will be happening over the next decade.
 - Important to consider direct emission reductions as well as indirect
 - The master agreement will be an important tool in achieving this
- How to square the circle? – Advantages to showcase rallying in WG woodlands as environmentally aware; Showcase NRW's perspective (SMNR) and help move society towards a more sustainable model
- Who might do what?
 - Role for MSUK: NRW can't deal directly with every rally
 - Role for NRW – as an active partner influencing transition to greater SMNR
- Rally as a focus (forum) for innovation:
 - Emphasise community and partnership
 - NRW and motor industry working together
- Perceptions of CO2 impacts vs. their true balance in practice (e.g. majority via spectator travel – compare to other sports or recreational activities)
- Opportunity cost – WG could allow other and support activities instead

MS Teams Chat History transcribed (edited to remove irrelevant messages and anonymised):

- Glaringly missing: international profile for Wales
- Extra media value, E-sports, Extending the seasons – different audience, Worldwide coverage
- Sports Tourism - Happy to discuss it
- [...] and I felt that impact on businesses other than tourism should be included, e.g.: garage services, rally car design businesses. Often in rural areas of Wales.
- Really good point [...] about local non rally businesses. Our rural Cllrs love the positive impact Rallying has on the community and businesses
- 900+ hours of global TV coverage • 60m global TV viewers • 620m global event digital impressions • 90m+ social media reach
- There remains the potential for new innovative classes of vehicle or types of event. And the potential for extra events to be slotted into the calendar.
- Holding rallies out of season e.g. Cambrian in February and WRGB in October extends the tourist season, and doesn't cannibalise current visitors, sustaining hotels through leaner times...
- The benefits to the hospitality industry are greatest in Conwy but extend to other parts of Wales as well
- Beyond "missing" we discussed:
 - "net zero carbon footprint confirmed for WRGB in 2008" - has that continued and that focus should be on emissions reductions rather than offsetting?
 - Whether rallying has similar particular resonance for regions other than Conwy.
 - Need to understand impacts in wider context, e.g.: total no. of vehicle movement on the Welsh Gov. Woodland Estate.
- I did put a hand up in response to [...] comments. [...] has also alluded - it's not just a case of raising Wales profile overseas - it's specifically a case of seeing Wales having a place on a global series, which was always important for WRGB and has been carried over into our consideration of other sports e.g. sailing.
- I feel we need to keep in mind that there are usually 2 sides to each of these, e.g.: positive impact of showcasing Wales as an international destination for rallying could have a negative impact on Wales brand as an international destination for eco-tourism.
- "Is this something for Natural Resources Wales (NRW)?" may be a different question than "Is this something for Wales?" I think it is worth considering whether "no rallying on the Welsh Gov. Woodland Estate" would enable NRW to put the corporate energy spared into other things that may feel more directly beneficial to SMNR, i.e.: there could be an opportunity cost to all the positive stuff (for which thanks you) folk have said about how NRW manages rallying on the WGWE.
- The key to juggling different opinions/objectives will always be effective communications. The more a community feels part of the event the more successful the relationship with the community is (e.g. managing complaints etc) thanks
- Leading change is a good point - "if these top rally drivers are reducing emissions then I will too" - but it also cuts both ways "if NRW is allowing this damaging activity in these woods then I'll damage them too". NB: I know that's simplistic.
- Will you be circulating notes from the meeting so participants can judge these as an accurate reflection of the discussions?

Part 4: Description of the Motorsports in the WGWE system

Figure 4 in Annexe 2 provides a visual overview of the stakeholders, governance processes and processes comprising the motorsports in WGWE system. The following text provides details about the system, its organisation and governance.

Overview of rallying in the WGWE

- Gravel, loose surface rallying in Wales generally takes place in the Welsh Government Woodland Estate managed by Natural Resources Wales/Cyfoeth Naturiol Cymru. In a normal year, 7-9 National level, one-day, events of between 85 and 130 cars competing over 45 miles of forest tracks take place. In addition, the 200-mile UK round of the World Rally Championship, Wales Rally GB, has usually run between February and October. The Roger Albert Clark Rally, a major event for historic rally cars, runs every two years with some of the stages being on NRW property. There are several privately owned venues in Wales at which lower-level competitive events have been run.
- The one-day events are as follows:
 - Cambrian Rally organised by North Wales Car Club based in Llandudno
 - Rally North Wales organised by Wolverhampton and South Staffordshire Car Club based in Dolgellau
 - Rallynuts Stages Rally organised by Midland Manor Motor Club and based in Builth Wells
 - Plains Rally organised by Knutsford and District Motor Club based in Machynlleth
 - Red Kite Stages organised by Amman and District Motor Club based in Resolven
 - Nicky Grist Stages organised by Quinton Motor Club based in Builth Wells
 - Woodpecker Stages organised by 60 and Worcestershire Motor Club based in Ludlow with most stages in Welsh forests.

All these rallies are rounds of the Pirelli Welsh Forest Rally Championship along with the Wydean Rally which currently runs exclusively in England. In addition, the Cambrian Rally is a round of the British Rally Championship. The Cambrian Rally, Plains Rally, Rally Nuts Stages, Nicky Grist Stages and Woodpecker Stages are all rounds of the UK Wide BTRDA Gold Star Championship. Rally North Wales and the Red Kite Stages are rounds of the Fuchs Lubricants British Historic Rally Championship.

- Cars of different technical specifications and performance as well as age compete together over the same stages and routes; similar cars are ranked in classes.
- Motorsport, more generally forest rallying, where the competitive activity takes place off the public roads, has had a long tradition in Welsh rural sport and culture since the 1960s when the RAC rally first used the then Forestry Commission forests for the competitive trials.

Rally governance

- Internationally, the sport is governed by the Fédération Internationale de L'Automobile (FIA). Their main involvement in Wales is with Wales Rally GB, which is a round of the World Rally Championship (WRC).
- At UK level the sport is governed by Motorsport UK.
- The Welsh Association of Motor Clubs represents the motor clubs in Wales, although some English clubs are also members.

Event organisation

- Rallying is promoted, organised, and run by motorsport clubs which are generally regional and registered with Motorsport UK, the UK governing body.
- For an event to take place it must obtain an MSUK permit:
 - The MSUK will provide scrutineers to check the safety and eligibility of the competing cars and an event steward to observe the running of the event and impose penalties on competitors and organisers if deemed appropriate.
 - Events are required to have MSUK licensed rescue units and recovery units in attendance, the number being determined by the route.
 - All competitors, named officials (including the Clerk of the Course who acts as event team leader, Stage Commanders and Timekeepers) and safety marshals must have an appropriate license issued, following appropriate training, by MSUK.
 - Press journalists, photographers and video crews are accredited by Motorsport UK.
- Events follow a prescribed process to receive a Permit from Motorsport UK. Documents including Route, Safety Plan and Regulations are submitted before a Permit is confirmed and issued. From that date Entries may be sought and accepted
- Rallying is a largely volunteer-led activity. None of the clubs are commercial organisations and any surplus produced will be reinvested in the sport in a variety of ways. Apart from WRGB, the organising teams are all volunteers who are involved in the planning and running of their event throughout the year. Each event requires large numbers of personnel as officials, specialist units and marshals:
 - The senior Officials plan safe routes and set out stage furniture to indicate junctions, hazards and locations for marshals.
 - The marshals, including radio units, safely manage the progress of competitors through the stages and report problems to the officials in charge. Where spectators are present these are managed and encouraged to stand in safe locations by the marshals.
 - Specialist units such as rescue and recovery units with Motorsport UK registered paramedic staff are present to be deployed onto the stage if necessary.
 - A timekeeping team set-up and manage the timing with specialised devices at start, finish and key locations.
- A servicing location is set up for cars to make checks and repairs, change tyres etc and refuel in accordance with safe procedures.

Route allocation

- A new system for dealing with the allocation of forest stages is about to come into place. Rally4Wales acting on behalf of MSUK will liaise with NRW. Each club wanting to use NRW roads will submit a proposed route to R4W. This will be passed on to NRW's local forest managers to ensure it does not conflict with, for example, logging activities or conservation. In addition, the police will be notified of the route while the local Rally Liaison Officer, appointed by MSUK, will check the route to ensure that the public road link sections are not likely to cause any problems.
- As a rule of thumb, each forest is used no more than twice a year, typically once on WRGB and once on a one-day event. There are also limits on the frequency with which any given stretch of public road can be used by events.

Competitors and motor businesses

- WRGB will attract the world's top professional rally drivers and teams while the one-day events will be tackled by amateur crews although there will always be a small number who aspire to becoming professional and MSUK runs an academy to support young competitors with this ambition.
- While some competitors will have built their own cars and rely on friends to help them service it on events others will have bought cars from specialist companies at costs that can go up to several hundred thousand pounds and will pay that same company or a similar one to prepare it for and maintain it on the event.
- Over the last 2-3 decades, technical specialising and development has led to growth in small motorsport enterprises within the UK. Approx. 75 businesses, typically employing 4-6 technical staff / mechanics primarily focussed on rallying, are located throughout Wales.

An SMNR review of Special Stage Motorsports Rallies in the Welsh Government Woodland Estate (WGWE)

Annexe 3: Review method

Jake Elster Jones

11/03/21

Our method built on that suggested in the review specification, with adjustments to facilitate deliberative, co-production alongside the other evidence gathering activities. Our methods were also developed and adjusted through the review process in response to the learning emerging and the engagement of system stakeholders (e.g. notably, we carried out around twice the number of stakeholder interviews than initially planned and ran two rather than one workshop at the end of the stakeholder engagement process). Our method is described in detail below. The main activities involved can be summarised as follows:

1. Initiation meeting.
2. Initial stakeholder interviews.
3. Project direction document.
4. Main stakeholder interviews (engagement round 1), designed to:
 - Achieve wide engagement.
 - Identify a full range of the different impacts and types of value in the system.
 - Provide evidence about rallying in WG woodlands as a whole system.
 - Snowballing to identify any further key stakeholders.
5. Local Rally Questionnaire
6. Interview evidence compilation and summary.
7. Feedback to key NRW staff (reporting emerging findings and discussing the SMNR review approach).
8. Stakeholder Workshops (engagement round 2):
 - Internal NRW workshop to prioritise value identified and sense check system view.
 - External multi-stakeholder to: check priorities and gaps; Explore how changes might effect value in the system; Discussion, exploration and deliberation to identify ways of maximising value in the system and options for future development.
9. Analysis and assessing the system against SMNR
10. Report writing.
11. Presentation to NRW board (with details about evidence, stakeholder positions and potential ways forward).
12. Project management.

1. Initiation meeting

We met with NRW staff and the project 'Critical Friend' to:

- Discuss our approach.
- Begin to gather evidence about the rallying in woodlands system and the impacts and types of value that emerge from it.
- Identify an initial list of stakeholders to interview and engage with the project.

2. Initial stakeholder interviews

We conducted interviews with seven key stakeholders within NRW and rally organisations, to further build up our understanding of the rallying in WG woodlands system and the range of types of value associated with it. We also discussed the methodology for assessing evidence about rallying in WG woodlands against SMNR with key experts in NRW. In addition, we used these interviews to identify further stakeholders to engage with (we continued to use this snowballing technique through the project). Our interviewees took written notes during the interviews to record evidence and discussions.

Another principle of our approach is that of iteration: throughout the review, we have treated our findings as 'open ended' and continued to expand and refine them. This has included adding to and refining findings as we speak to new stakeholders and carry out further evidence gathering (e.g. via ongoing interviews and the stakeholder workshops); we have also fed back what we have found to stakeholders involved in the review, allowing them to comment on and refine the evidence.

3. Project direction document

We wrote a brief report for NRW project managers outlining our first impressions of the system and the understanding of the system and the range of types of value associated with it (as well as what we had learned about data sources and potential data gaps related different types of value). We also further outlined issues we had identified, our thinking and what we had learned from stakeholders, about how to approach the challenge of assessing the rallying in woodlands system against SMNR. As well as recording learning and progress to date, this served to feed back what we had found to system participants (especially the NRW project manager who is centrally involved in the rallying in woodlands system) to allow for checking and iteration (again a process that continued throughout the review). This document is available on request.

4. Stakeholder interviews

Overall, we carried out interviews with 37 stakeholders (an additional 28 interviews following the initial 7), covering the following groups:

- NRW
- Motor sport organisations
- Motor sport businesses
- Welsh Government (events and forestry departments)
- Conwy County Borough Council
- Local communities affected by rallying
- Businesses associated with other recreational uses of woodlands (e.g. mountain biking)
- Forestry and Land Scotland
- Other organisations managing woodlands where rallying might take place (Confor, Dwr Cymru and the Woodland Trust)

The interviews were informal and semi-structured. We explained the purpose of the review and described SMNR (including the fact that it requires multiple types of value to be taken into account and represents a process rather than an end point). We asked the interviewees to tell us about:

- The rallying in WG woodlands system from their perspective.

- The main impacts that were associated with the system (good and bad) and other aspects that they considered important.
- Any potential changes in the system or factors that they thought would lead to change.
- Other stakeholders we could usefully engage in the review.
- Any sources of evidence or data associated with the impacts and other important aspects of the system they had described. We asked them to provide us with any written sources containing data that they might have.

Where interviewees discussed aspects of interest to the review, we queried them further and asked for clarification or further information. Our interviewers took written notes during the interviews to record evidence and discussions.

5. Local Rally Questionnaire

We distributed a questionnaire to organisers of all of the local rallies. These covered questions including:

- Numbers of people involved in rally organisation, including core organising teams and wider volunteers.
- Numbers of paid and voluntary hours involved in organising and running the rally.
- Numbers of competitors.
- Rally budgets (including balance of costs and expenditure).
- Numbers of spectators estimated.
- Stage miles and road miles used.
- Any evidence of benefit to local areas collected.
- Planned or actual actions to reduce negative environmental or community impacts.

We received responses from 6 rallies (Cambrian, Nicky Grist Stages, Plains Rally, Rally North Wales, Roger Albert Clark and Woodpecker Stages).

The results were received late in the review process and have not been written up into a formal report. However, the results were compiled and summarised and contributed to the evidence reported by the review.

6. Evidence compilation, analysis and summary

We compiled evidence from the interview write-ups, separating out points from the interviews that related to different types of impact or outcome or component related to the system. This produced a spreadsheet of pieces of evidence from interviewees about value in the rallying in WG woodlands system. This spreadsheet had approximately 470 rows (this is not a final count as evidence about impacts and other aspects of importance has continued to be collected and reported by stakeholders through the whole project – e.g. during workshops or subsequent conversations with some stakeholders). We carried out thematic analysis of this evidence to identify types of impact or issue of importance associated with the rallying in WG woodlands system that are reported by interviewees. This process led to our identifying around 66 types of impact or aspect of the system that interviewees reported, which we further summarised into around 18 main themes of impact or aspect that interviewees reported as important to consider.

Taking another approach to organising the data, we also organised this range of impacts and aspects of importance according to the Revaluation 6 box framework, which provides a way of organising and thinking about different types of value in any complex system (See section outlining the approach below, and discussion in the report text, for more information about this framework). This produced a table of over 100 unique types of value (aspects of importance) that had been reported about the system by participants in the system (stakeholders).

7. Feedback meeting

We held a meeting with senior NRW decision makers to present our emerging findings and observations and to discuss the types of evidence that would be most useful for NRW decision makers as outputs of the review (and how they might be presented and communicated). This meeting also allowed us to gather additional evidence from these stakeholders, iterate the evidence we had already collected and identify further stakeholders to engage in the review.

8. Workshops

We held two online workshops as a final phase of stakeholder engagement and evidence collection, as follows:

i) Internal NRW workshop

We ran an online workshop for NRW stakeholders to:

- Review the evidence collected so far in the review (including, checking for any missing points or clarification; and steers on the most important evidence gaps).
- Identify priority impacts and issues (the most important aspects of value) associated with the rallying in woodlands system, for NRW. This included identifying which impacts and outcomes from the system are considered of most important as well as priorities for change in the system going forward.

10 participants took part in a two-hour online workshop using the Microsoft Teams platform (which was the current platform being used by NRW). Participants were provided in advance of the workshop with summaries of the range of types of impact or value that our review had revealed (in a conventional and a Revaluation 6 Box format), together with some observations and questions to reflect on.

During the workshop:

- We presented a summary of the findings from the review, describing how the aspects of importance identified by stakeholders spanned quantifiable outputs, qualitative outcomes and aspects relating to the coherence, resilience and direction of the system as a whole.
- Participants took part in facilitated break out group exercises during which they identified and agreed priority points of value of different types (ranging from quantitative outputs, through qualitative outcomes to framing goals and policies, governance processes, relationships, resilience and the potential for future movement of the system.
- Break out group discussions were fed back to the full group of participants in plenary and priorities were further discussed and refined.

The plenary discussions were recorded (via the Microsoft Teams record function) and our researchers took notes throughout the workshop. We invited participants to submit any additional comments that they wanted to contribute in writing following the workshop. We received written input from two participants plus additional input from two NRW members of staff who had not attended the workshop but had been asked afterwards to contribute comments by their colleagues who had attended.

The outcomes of this workshop let us identify priority points of value in the rallying in WG woodlands system, which formed a major input into the second, multi-stakeholder, workshop. The evidence from the workshop has been written up in a separate report¹.

ii) External multi-stakeholder workshop

We ran an online workshop for the wider group of stakeholders engaged with the review to:

- Review and iterate priority points of value identified by NRW stakeholders from the wider perspective of other stakeholders (including identifying any additional points that other stakeholders thought should be included or any points of disagreement).
- Consider how different potential changes to the rallying in WG woodlands system might change the value in the system (and what changes might act to optimise value).

16 participants took part in a two-hour online workshop using the Microsoft Teams platform. Participants were provided in advance of the workshop with lists of the priority points of value identified during the NRW workshop, together with some comments and questions to prompt reflection.

During the workshop:

- We presented a summary of the findings from the review, including the priority types of value in the system identified during the NRW workshop. We described how the aspects of importance identified by stakeholders spanned quantifiable outputs, qualitative outcomes and aspects relating to the coherence, resilience and direction of the system as a whole.
- Participants took part in a facilitated break out group exercise during which they considered and discussed the likely changes to the priority types of value in light of two possible future scenarios for rallying in WG woodlands: a) rallying continuing in WG woodlands without the Wales Rally GB event; and b) no more rallying taking place in WG woodlands. Key observations about potential changes to value in the system in light of these two scenarios were fed back by each group to all participants in plenary and briefly discussed in plenary.
- Participants then took part in a second facilitated group break out exercise during which they were asked to consider and discuss the types of changes (or direction of change) in the rallying in WG woodlands system that might lead to the optimisation of value (more positive outcomes and reduced negatives). Again, the breakout groups then fed back key observations and points to the full group of participants in plenary.

¹ (Elster-Jones, 2021a)

No recordings were made during this second workshop due to technical concerns, but our researchers took notes throughout the workshop. The evidence from the workshop (participant feedback about priority value in the system; participant comments about changes to the priority value under different scenarios; and suggestions for changes that could lead to increased value) has been written up in a separate report².

9. Analysis: Assessing the system against SMNR

The approach taken to assessing the rallying in WGWE system against SMNR using evidence gathered from this review is discussed in detail in the Headline Findings report.

10. Reporting

We worked with the NRW Project team from the start of the project and throughout to ensure that the data collected, assessments carried out and the deliberation process with stakeholders produce evidence that will be practically useful. Towards the end of the project we met with the NRW Project Team to present and talk through final findings and agree a format for presentation of the evidence that would most effectively communicate our findings.

Presentation of final report

We have offered to present and discuss findings and recommendations to the NRW board and any other stakeholders, as required by NRW. We will discuss this requirement with the NRW project manager and respond accordingly.

11. Project management

We have held regular project management meetings (usually via MS Teams) internally within our team and with the NRW project manager.

This process has been augmented by the appointment of a 'Critical Friend' who has joined meetings, reviewed reports, observed workshops and spoken to stakeholder interviewees. They have used this oversight to provide feedback and suggestions informally through the project and will produce a separate report for the NRW project manager at the end of the review.

² (Elster-Jones, 2021b)

Introduction to Revaluation

Revaluation is an innovative process for making and measuring change in complex systems. It is a new approach, developed in the context of NHS Change Day 2015, a self-styled 'social movement' for improving patient experience. The organisers of Change Day felt it was impossible to evaluate – based in part on having tried to do so in previous years – and commissioned Andrew Darnton and Andrew Harrison to 'reimagining evaluation'.

Revaluation has since been applied in diverse settings including work on the natural environment, encouraging physical activity, and service transformation. In 2017 it was used to undertake a full scale appraisal of the value of the Family Nurse Partnership in Northern Ireland, and then in 2018 across Scotland. It has been built into the Reform agenda for Greater Manchester through the Mayor's vision for an active city region, GM Moving. It is also currently being used by UK primary schools to measure the value of The Daily Mile – which we then feed back to the national Foundation, through sitting on its Steering Group.

Academically, Revaluation has been explored via work as part of the Centre for Evaluation of Complexity Across the Nexus (CECAN) at the University of Surrey (e.g. <https://www.cecan.ac.uk/wp-content/uploads/2020/08/EPPN-No-07-Revaluation.pdf>).

Revaluation is practiced as a participative approach to evaluation. It is centrally concerned with revealing the value of an activity or intervention in a complex system. Rather than asking "what works", its first question is "what is going on?" For this and other reasons, Revaluation has been described as "a paradigm shift in evaluation".

Revaluation has emerged from practice: a framework to capture the value of people's (often voluntary) work for patients in the NHS, based on how junior doctors and nurses talk about what they do and why. Though it is grounded in deep theory, and informed by best practice in social research methods, it is experienced by participants as a simple process of storytelling and collective sense making. This too is in keeping with best practice: in the most complex settings, participative and emancipatory approaches are the best methods (supported by system mapping and modelling) [see e.g. Cecan Supplement to HM Treasury's Magenta Book, 2020].

Revaluation 'on the ground' involves three main activities:

- Storying

Actors talk about what matters to them in a place, or their work in a place: what is going on, and what is good.

- 6 Boxing

Actors translate their stories into accounts of value, structured using the 6 Box framework [shown below]. The 6 Boxes capture (and display) number value, non-number value, and relational value – based on the nature of the networks and relationships in a system. The Boxes also highlight the difference between visible value (known and present, already recorded) and invisible value (knowable, future, emergent).

- Socialising Value

Actors come together around their 6 Box accounts, and compare and contrast the value they have revealed, reflecting on it, and potentially synthesizing it by overlaying their

accounts one on top of another. This process highlights the theoretical point that all value is shared and social. As an outcome, a picture of the ‘full value’ of a system (of systems) is reached, which feels authentic to actors at all levels. In the process, actors come to know themselves better, and function better as a group.

This is the essence of the Revaluation process, but it is experienced differently in each setting it is undertaken – for instance, it can last a few months or years. In each setting the aim is to build participants’ own capacity for self measurement, such that they become adept at the 6 Boxes, and embed the process into their ways of working. In the end, measurement should come to be seen as a part of their work, not apart from their work.

	VISIBLE	INVISIBLE
CALCULATE		
CALIBRATE		
CAPACITATE		

1.1 Design Principles

When working in a complex system, it is important to be able to be iterative and allow for emergence. Revaluation starts from, and returns to, a set of design principles, which guide our ways of working with each other throughout the process. The methods and outputs that are used in a project emerge from these constant principles.

- **Measure what Matters.** In a complex system, what is going on is often clearest at smaller spatial scales (e.g. neighbourhoods, and individual lives). Actors themselves know where the value is, and measurement should help them to reveal and express that value to others. Setting measures and ‘research questions’ is part of the work, and at all levels of the system.
- **Insource everywhere.** Because actors know where the value is we need to work with them as co-researchers to reveal it. In the process, we need to join in with their work in their systems (in Revaluation, evaluator and evaluated are equal). Working this way builds actors own capacity, and adds value in the system (the inverse of outsourcing, which is the standard approach in orthodox evaluation).
- **Measurement is an active input** into the system under inquiry. Measuring value makes value, and as soon as actors begin to see the value of the work, they make adaptations. Meaningful measurement modifies behaviour.
- **Cut the system.** You cannot see a complex system from any one place, so the picture of value needs to be built up from multiple perspective in each ‘layer’ of the system. In some systems, we would describe individual residents as the nano system, their communities or groups as the micro system, the local and regional as the meso and exosystems, up to the national governing body as the macro system. It is essential to gather accounts of value at all levels at which stakeholders are involved in the system.

- **Fit the Contours.** The approach to measurement and learning should reflect the context and dynamics of the local projects. 'Minimising friction' is necessary as it helps actor find ways (and the time) to get engaged with measurement (thereby avoiding the 'burden of evaluation'). This also helps actors to recognise themselves and their actual working experience through the data that is available.



Paper Title:	Proposed launch of statutory consultation on salmon and sea trout rod fishing controls in three rivers: Usk; Wye and Severn (in Wales)
Paper Reference:	21-07-B19
Paper Sponsored By:	Ceri Davies, Executive Director of Evidence, Policy and Permitting
Paper Presented By:	Peter Gough, Principal Advisor, Fisheries
Purpose of Paper:	Decision / Scrutiny
Recommendation:	<ol style="list-style-type: none">1. To consider final byelaw proposals for the three rivers and provide comments.2. To advise on any remaining key matters and identify risk.3. We ask that the Board gives advice to support approval for launch of the formal statutory consultation on the proposed new byelaws for rod for salmon and sea trout on the Usk, Wye and Severn (in Wales). <p>On receipt of approval, the made byelaws will be advertised and the technical case and associated documents will be published on our consultation Hub for 12 weeks.</p>

Issue

1. The status of our stocks of salmon and some sea trout, which are discrete to individual river catchments, continue to give serious cause for concern. Directors and Board have previously been briefed on, and agreed, the development and implementation of fishing controls to respond to this – most recently the ‘All Wales Byelaws’ (Wales Rod and Line (Salmon and Sea Trout) Byelaws 2017) (came into force on 1st January 2020), the ‘Cross Border Rivers Byelaws’ (Cross Border Rivers Rod and Line (Salmon and Sea Trout) (Wales) Byelaws 2017) (came into force on 31st January 2020), and most recently the Severn (in Wales) Emergency Byelaws (came into force on 1st March 2021).
2. In each case the driver has been to reduce mortality in rod and, where appropriate, net fisheries to maximise the survival of fish to spawn, thereby promoting stock recovery to

more sustainable levels. We are also now taking account of the decline in juvenile salmon densities, most notably those of the River Usk, first detected in 2016.

3. The Board has previously indicated their approval for this evidence-based approach.
4. Byelaws provide the mechanism to amend rod and net fishing controls, including the means for imposition of statutory catch-and-release fishing. We have concluded that new byelaws are required in the three rivers in question, and we will work with the Environment Agency to secure a consistent outcome for the two cross-border rivers.
5. **Statutory and Legal Scheme (SaLS)**

Under the SaLS, delegated approval level for launch of a statutory consultation and, subsequently, of an application to the Minister for confirmation of new area-based byelaws is to the Head of Operations together with the Head of Legal Services. However, when matters might be regarded as high profile or controversial then they may be referred to the Board for advice and support of the delegated SaLS process.

6. This paper sets out the next stage in the process towards new byelaws and seeks approval from the Board to proceed with the statutory consultation that is required to support this.

Background

7. Directors and Board members will be aware that our annual stock assessments for salmon and sea trout have demonstrated that all populations of salmon (in 23 principal salmon rivers), and now also most sea trout populations (27 of 33 main sea trout rivers), are unsustainable. This has triggered work over the past decade to develop proposals for new fishing controls, based largely on statutory catch-and-release (C&R) fishing, to initiate stock recovery.
8. In proposing further such byelaws now, we are adopting the management approach that was successfully tested in a Local Inquiry in 2019. The Inspector concluded then that the byelaws proposed were "...necessary, proportionate and reasonable in view of the decline of salmon and sea trout stocks throughout Wales.". The Minister for Environment, Energy and Rural Affairs accepted this advice later that year when she confirmed the new byelaws implemented in 2020.
9. It is important that such fishing controls are synchronous with initiatives and action by NRW and partners to address the underlying causes of stock declines, for example by restoring river habitat quality and addressing all causes of water pollution. Planning such action was an explicit requirement of the Minister in approving byelaw controls, the NRW response to which was the Plan of Action for Salmon and Sea Trout.
10. The current position on rod fishing controls in the three rivers is: -

Severn

The Environment Agency (EA) have completed their statutory consultation on measures. EA have adopted a broadly similar approach to NRW's 'All Wales' byelaws (including mandatory catch and release of all salmon and sea trout together with specified method restrictions) to be applied to fishing within England. NRW's current

understanding is that they will shortly apply to Defra for confirmation of these.

Fishing on the Severn in Wales is currently regulated by Emergency Byelaws, implemented by NRW following Board approval in February 2021 and expiring after 12 months.

NRW must now consult on new longer-term byelaws and in so doing will adopt the technical case published by the Environment Agency, thereby maintaining the principle that they lead on such management matters for the whole River Severn. The objective is to gain approval for such measures to coincide with expiry of the Emergency Byelaws.

Wye Existing Welsh and English byelaws mandating the release of all rod caught salmon and sea trout have been in place since 2012 but will expire in December 2021.

New byelaws are required and, as NRW takes the management lead for such matters for the whole Wye catchment, NRW has prepared a technical case to support a statutory consultation. The Environment Agency is minded to adopt this technical case for their own consultation in England.

Both jurisdictions will seek approval for new measures to be confirmed before the rod fishing season in 2022 commences on the 3rd March.

Usk Existing catch and release byelaws are in place under the 'All Wales Byelaws'. However, in contrast to all other rivers covered by these byelaws, measures for Usk salmon and sea trout expire in December 2021. This arrangement was a specific response to the breeding failure of salmon in 2015/16 and the early expiry date was implemented as a precautionary measure pending re-consideration in 2021. All other controls within the 'All Wales' byelaws remain in place until 31st December 2029.

Our conclusion now is that new byelaw controls are required, and we will seek approval for new measures to be confirmed before the rod fishing season in 2022 commences on the 3rd March.

Evidence Supporting our Position

11. The technical cases for a) the Severn and b) the Wye and Usk present all evidence used to build the cases for controls.

12. In summary, the critical evidence that we have reviewed is: -

A) Adult salmon stock assessments in the three principal salmon rivers
The status of the stock in each river is: -

River	2024 Risk status	Conservation Limit (millions of eggs)	Egg deficit on Management Target (%)

Usk	Probably at Risk	10.1	-17%
Wye	Probably at Risk	38.6	-44%
Severn	Probably at Risk	12.9	-32%

- B) Adult sea trout stock assessments in the three main sea trout rivers
The status of the stock in each river is: -

River	2024 Risk status	Conservation Limit (millions of eggs)	Egg deficit Management Target (%)
Usk	Probably at Risk	9.90	-84.1%
Wye	Probably at Risk	0.97	-30.3%
Severn	Probably at Risk	0.42	-10.3%

- C) Juvenile salmon and trout population survey data

Board members will recall substantial concern around the low levels, principally of juvenile salmon but also for many trout populations, that were detected in the 2016 survey season. The results were unprecedented and of great concern. Subsequent annual surveys have shown continued low abundance in most catchments especially on the Usk.

Many factors influence juvenile fish populations, both in freshwater and at sea and so it is difficult to track impact of low juvenile abundance through to subsequent adult returns. However there remains a marked shortfall in adult salmon abundance in each of these rivers and elsewhere across Wales.

13. A full review of factors damaging salmonid populations in Wales was provided to Welsh Government (WG) in April 2020 (NRW's Plan of Action for Salmon and Sea Trout).

Proposals for fishing controls

14. As always, we need to respond positively and authoritatively to the evidence, basing our proposals on stock status, risk, and the principles of SMNR and precautionality.
15. NRW is required to follow the management system for salmon that has been agreed in partnership with the EA, WG and Defra, and with North Atlantic partners through the Convention underpinning NASCO (the North Atlantic Salmon Conservation Organisation), of which since Brexit the UK is now a full member. The decision structure developed for this purpose, together with management advice provided by NASCO and other evidence, including that for juvenile populations, is all considered in our concluding position.
16. Our proposal is to advertise and launch simultaneous statutory 12-week consultations on the NRW Hub for:
- A) The Severn (in Wales),
 - B) The Wye (in Wales) and the Usk

Stakeholder Engagement and Comms

17. We have engaged with our stakeholder groups on prospective new control measures through focused meetings of our three Local Fisheries Groups (Usk, Wye and Severn) which include rivers trusts' representatives. There was good attendance at the Wye and Usk events, however disappointingly only 2 of several invited representatives attended the Severn LFG. Views and opinions of the groups on stock status and the potential need for new byelaw measures were sought and debated.
18. There was almost unanimous support for reinstating catch and release measures for salmon and sea trout on the Usk and Wye. We have evaluated other suggestions made by stakeholders, including amendments to fishing seasons on the Wye and certain method controls on the Usk, within the technical case but the only option that we propose to take forward is to end the anomalous weeks extension to the end of the season on the upper Wye and tributaries.
19. We have maintained dialogue with Welsh Government and, where appropriate, the Environment Agency and subject to Board approval to launch the consultations we will send briefings to all MSs and MPs.

Summary of proposed byelaws

20. The proposed controls are intended to maintain rod fisheries with the associated socio-economic benefits, whilst maximising the survival of fish to spawn.
21. The core measure is statutory catch-and-release fishing, providing a clear and level playing-field for all, with regulation of permissible fishing methods to minimise the risk of post-release mortality.
22. The key to our proposed measures has been the ongoing liaison, engagement and communications with local stakeholders – who have supported our proposals.
23. The proposed byelaws for the Usk and the Wye in Wales would expire in December 2029, thereby coinciding with the expiration of the 'All Wales' and 'Cross Border' byelaws. The proposed byelaws for the Severn in Wales would expire in 2031, 10 years after implementation (representing 2 cohorts of salmon), coinciding with the EA's proposed controls for the river.
24. Our proposals are: -

SEVERN (IN WALES)

SALMON

Statutory C&R fishing at all times

Method controls: Ban on bait fishing
Barbless hooks only
Ban on treble hooks for spinning
Hook size restrictions

SEA TROUT

Statutory C&R fishing at all times

Method controls: Ban on bait fishing

Barbless hooks only
 Ban on treble hooks for spinning
 Hook size restrictions

WYE (IN WALES)

SALMON

Statutory C&R fishing at all times
 Revised end date for the season so that it runs from 3rd
 March to 17th October for the whole river and tributaries

Method controls unchanged

SEA TROUT

Statutory C&R fishing at all times

Method controls unchanged

USK

SALMON

Statutory C&R fishing at all times

Method controls unchanged

SEA TROUT

Statutory C&R fishing before 1st May

Method controls unchanged

Size limit unchanged (fish larger than 60cm to
 be returned alive)

Technical case

25. To support the consultations a full technical case has been prepared for the Wye and Usk by NRW, and we have adopted that of the Environment Agency for the Severn (in Wales). These case documents are required in order to justify the need and the proposed solutions to address the poor status of our stocks.
26. The technical case is available for review by Directors and Board members and will be reviewed by WG prior to the launch of the consultation.

Habitats Regulations Assessment

27. Salmon are a feature of the Wye and the Usk SAC sites, and the joint European Site.
28. NRW has prepared a draft Habitats Regulations Assessment of the proposed measures for the rivers Usk and Wye and will commend this to Welsh Government who will be the competent authority under the Habitats Regulations. The draft HRA will not be a part of the consultation and will not be provided on the Hub.

Socio-economic considerations

29. Salmon and sea trout fisheries contribute many millions of pounds to local rural economies and also have an associated social value. The existence of salmon and sea

trout in our rivers is also an indicator of a healthy environment. Our aim is to improve the social and economic benefits that come from the sustainable use of recreational fisheries, whilst also ensuring the conservation of these fish that represent an important part of our wildlife diversity.

30. In developing our approach, we have been mindful of the goals set within the Well-being of Future Generations (Wales) Act: (A prosperous Wales; A resilient Wales; A globally responsible Wales). The Act requires us to improve the social, economic, environmental and cultural well-being of Wales.
31. Anglers benefit from a high-quality recreational resource and their travel and enjoyment of their sport has an economic value to the local communities.
32. Our proposed approach to fishing controls has balanced our international and domestic commitments to sustainable stock management, balancing and maintaining many of the social and economic benefits of the fisheries without requiring the closure of fisheries.
33. We consider that the way to maximise benefit for the medium to long term is through the recovery of our salmon and sea trout stocks, so that they may return to sustainable levels and runs and support larger catches. Our management proposals are intended to achieve this, and although we are aware that there might be a risk of a short-term reduction in fishing activity, there has been no evidence of this during 10 years of control on the Wye. There would be continued access to fishing on each river. Our proposals are an investment to achieve medium to long-term sustainability whilst ensuring that fishing can continue.
34. The measures being proposed would not ban fishing, merely the renewed killing of salmon and sea trout, so the overall impact would be unchanged to that of the last 10 years on the Wye and the past year on the Usk and Severn (in Wales). It is difficult to avoid the conclusion that the conservation of valuable stocks far outweighs any transitory impact on economic activity.

Publication, implementation and deadlines

35. The aspiration is to launch the statutory consultation on our Hub as soon as possible after Board review and comments have been taken into account. We are advised by WG that all consultations require a consultation period of 12 weeks.
36. New fishing byelaws are required to be in place before the commencement of the 2022 fishing seasons on the 3rd March.

Communication

37. We have developed a campaign plan with our communications team. Our 'open and no surprises' engagement will continue through our Local Fishery Groups throughout Wales, and our regular contacts with WG, NGOs and the EA.

Recommendations

- i. To consider final byelaw proposals for the three rivers and provide comments.
- ii. To advise on any remaining key matters and identify risk.
- iii. We ask that the Board gives advice to support approval for launch of the formal statutory consultation on the proposed new byelaws for rod for salmon and sea trout on the Usk, Wye and Severn (in Wales).

38. On receipt of approval, the made byelaws will be advertised and the technical case and associated documents will be published on our consultation Hub for 12 weeks.

Key Risks

Stakeholder liaison fails:

39. The proposals are well known to the great majority of our customers and stakeholders who are in almost unanimous support. There will always be some who we have not managed to reach, and experience suggests that some will be concerned when they learn of the proposals.

Organised opposition:

40. We are aware that some stakeholders are concerned and angry about past decisions that NRW have taken, and around other aspects of NRW's work where they perceive there has been failure. This might instigate a further concerted campaign against our proposals from the few disenfranchised stakeholders from the 'All Wales' byelaws and Local Inquiry.

Legal challenge:

41. Some stakeholders may choose to consider legal challenge to regulation of rod fishing. Past claims to seek compensation for further regulation of rod fishing have been unsuccessful. We are aware of risks and have discussed them with legal advisors, concluding that the risk of challenge might be moderate, but the likelihood of success is low.

Technical concerns:

42. We have previously experienced challenges in explaining technical matters to our stakeholders, especially where evidence is limited by factors related to resource constraints or where the state of science is outside of our control.

43. Our stock assessment procedures are currently under review after which any amendments will be peer-reviewed. This is a commitment in the ministerial-approved NASCO Implementation Plan and NRW is fully committed to this. We will do what we can to explain the science, the concepts, the resource constraints and the implications for regulation of fishing, however we expect some negative responses.

Delayed progress:

44. We are aware that legal staff in WG are committed to a range of other work and that their time will be restricted. However, we are re-assured that WG fisheries staff regard this as a priority.

Board concerns:

45. We are committed to further work with the Board, should concerns be raised about any of the matters in the technical case or in this paper.

46. A decision to defer or deny approval to launch the consultation will be challenging, given the timescales involved, however we are anxious to respond to feedback and to act on it. In this regard a conditional approval to consult would be acceptable.

Possible requirement by Welsh Government for a Local Inquiry

47. In 2019 the Minister referred NRW's application for confirmation of byelaws to a Local Inquiry. NRW considers the outcome of this to represent a positive precedent and that the risk of a second inquiry is low. However, if convened this would represent a substantial resource and financial burden.

Financial Implications

48. Our work on the technical case underpinning the proposed consultation, the ongoing technical and management communications with stakeholders, and the ongoing collection, analysis, summary and reporting of technical evidence has been carried out by our fisheries 'virtual technical team'. This team is also committed to all other strategic and operational technical fisheries matters in Wales.

49. This resource commitment has placed our ongoing 'day job' activities under considerable pressure.

50. Future direct costs are limited to those related to advertising and managing the workload associated with representations that we anticipate.

Equality Impact Assessment (EqIA)

51. An EqIA has previously been carried out for further salmon exploitation controls. We will carry out an Impact Assessment following the consultation for final submission of the byelaws for confirmation.

Index of Annexes

Annex 1 Executive Summary – Usk and Wye (in Wales) byelaw proposals

Annex 2 Executive Summary – Severn (in Wales) byelaw proposals

Proposed new salmon and sea trout rod fishing byelaws for the Rivers Usk and Wye in Wales

Executive summary

This technical document sets out the case for the introduction of fishing controls to protect stocks of salmon and sea trout in the River Usk and the River Wye (in Wales) and presents concluding proposals for new byelaws to regulate fishing and the keeping of captured fish. This follows our review of evidence of the stock status derived from catch statistics, and the continued concerns over the status of juvenile fish populations in these two catchments.

The byelaws would replace the current byelaws mandating the release of all rod caught salmon and sea trout on the Wye that have been in place since 2012, and all salmon throughout the season and any sea trout caught before 1st May on the Usk, which are each due to end on 31st December 2021. NRW's case is that the proposed byelaws meet all three of the requirements of necessity, proportionality and reasonableness.

If new byelaws are not put in place for the 2022 season onwards, then there would be reduced protection of the vulnerable salmon and sea trout stocks in the rivers Usk and Wye. In evaluating management options, conservation and sustainability of the salmon and sea trout resources should take precedence. The proposals are also set in the context of maximising spawning escapement and promoting stock recovery towards improved resilience and sustainability.

The proposals would, if confirmed and implemented, see byelaws requiring statutory catch-and-release (C&R) fishing for all salmon and sea trout caught by rod on the River Wye (in Wales) and on the River Usk for all salmon throughout the season, and for any sea trout caught before the 1st May.

Natural Resources Wales is now seeking views on these proposals.

Our overall objective for salmon and sea trout is:-

“To protect, through the application of best-practice science and management, the sustainability of our natural resource of wild salmon and sea trout stocks in Wales.”

This technical case describes the status of stocks in the rivers Usk and Wye, considers issues around the exploitation of salmon and sea trout stocks and sets out the options for sustainable management.

In recent decades the status of most of our stocks of migratory salmonids in Wales has declined: the Usk and Wye are no exception. There is a complicated range of factors that has contributed to this, including the reduced survival of fish at sea, the pressures on freshwater habitats (including water quality), and past unsustainable

fishing effort in high seas and other interceptory fisheries including some fisheries in home waters. Some of these pressures have been addressed or removed, including introduction of mandatory catch and release of all salmon and sea trout in the Wye in 2012. However, stocks have not returned to levels of historical abundance, or even to a position of sustainability where exploitation can be allowed.

Our position is that stocks may be exploited when they are sustainable, but that until they are, we must ensure that pressures are moderated or excluded in order to achieve this goal. In line with this position, we introduced the 'All Wales' byelaws which came into force in January 2020, which mandate the release of all salmon caught by rod or net in Wales. On the Usk, they also mandate the release of any sea trout caught before the 1st May and all sea trout longer than 60cm.

Salmon is a species listed under Annex 2 of the EC Habitats Directive (Council Directive 92/43/EEC on the Conservation of natural habitats and of wild fauna and flora) and currently contributes to the designations of the Usk and Wye as Special Areas of Conservation (SACs). At the last report by the UK in 2019 the status of Atlantic salmon was reported as Unfavourable-Inadequate, because both population and future prospects were assessed as inadequate.

Both salmon and sea trout are listed as UK BAP (Biodiversity Action Plan) priority species. Both are therefore currently regarded as most threatened and requiring conservation action.

Under the Environment (Wales) Act 2016, there is a duty on public authorities to:-

“seek to maintain and enhance biodiversity so far as it is consistent with the proper exercise of those functions. In so doing, public authorities must also seek to ‘promote the resilience of ecosystems’”.

Both species are included in the list of the living organisms of principal importance for the purpose of maintaining and enhancing biodiversity in relation to Wales.

Evidence

We have considered 3 principal sources of evidence in concluding our preferred option for management change:-

1. The status of adult stocks of salmon and sea trout in both rivers
2. The status of juvenile salmon and trout stocks in both rivers
3. The status of salmon as a designated feature of the Usk and Wye SACs

Salmon

The most recent assessment of our stocks indicates that the Usk is currently 'Probably at Risk' and the Wye is 'At Risk' of failing to achieve their management objectives (in 2020), and both are predicted to be 'Probably at Risk' in 5 years' time (in 2025). Based on average egg deposition levels over the last 5-years (2016-2020), both the Usk and Wye have recorded deficits against their indicative Management

Targets of 4.35 and 24.52 million eggs, respectively. These deficits approximate to 1,449 and 8,175 8lb fish equivalents.

The status of salmon as designated features of both the Usk and the Wye SACs was 'unfavourable' in the most recently published round of Condition Assessments (Milner et al, 2013), driven largely by poor adult runs.

Sea trout

The most recent assessment of our sea trout stocks indicates that the Usk stock is currently 'At Risk' of failing to meet its conservation limits and is predicted to remain 'At Risk' in 2025. The Wye stock is currently 'Probably At Risk' of failing to meet its conservation limits and predicted to still be as such in 5 years' time.

Juvenile Salmonids

The status of juvenile salmon stocks in the Usk is of serious concern. Since 2015 there has been a decline in fry across the catchment with a significant failure of recruitment in 2016 (Gregory et al, 2020). Returning adult salmon numbers have been low in 2019 and 2020, although some uncertainty remains as to whether this can be wholly attributed to the 2015/2016 recruitment failure. The numbers of juvenile salmon in the Usk catchment have not substantially recovered since this time, remaining at low abundance in both 2018 and 2019.

Whilst the 2015/16 recruitment failure seen on the Usk was also evident on the Wye, it was not as severe, and some recovery has been seen since. However, the juvenile salmon population on the Wye has been below average in recent years and remains of concern.

Options

We have considered the following principal options:-

1. **Do nothing** further, allowing the current catch and release byelaws on the Usk and Wye fisheries to lapse on 31st December 2021.
2. **Maintain current C&R restrictions.**
3. **Maintain current C&R restrictions and introduce additional measures.**
4. **Closure of the rod fisheries**, resulting in negative socio-economic impacts.

Further options around season dates and method restrictions have also been considered and are detailed later in this technical case.

We conclude that:

Option 2 is required for the Usk, and for sea trout on the Wye;

Option 3 is required for salmon on the Wye.

Our proposals

We are proposing to seek confirmation of new byelaws for rod fishing on the River Usk and the River Wye. We propose the following measures to run until 31st December 2029, a date selected to synchronise dates with the period of the 'All Wales' and 'Cross Border' byelaws that were implemented in 2020.

River Usk

A. Salmon

Statutory catch and release fishing at all times.

B. Sea trout

Statutory catch and release fishing from the start of the fishing season until 1st May each year

River Wye

A. Salmon

Statutory catch and release fishing at all times.

Revised finish date for the season, the open season to run from 3rd March to 17th October for the whole River Wye.

B. Sea trout

Statutory catch and release fishing at all times.

Note: NRW is working with the Environment Agency on the technical case and rod fishing byelaws for the Wye and is seeking to ensure commensurate byelaws for the Wye in England, thereby ensuring a consistent catchment approach for the cross-border river.

Your response

We would like your views on our proposals and invite you to submit these using the form designed for the purpose which is available via our consultation hub.

[Respond to the consultation on proposed Usk and Wye byelaws](#)

Hard copies of the documents can be requested by emailing fisheries.wales@naturalresourceswales.gov.uk: Or by writing to:-

Sophie Gott
Usk and Wye byelaws
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Fortran House
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Respondents on matters for the River Wye should note carefully that representations to this consultation for arrangements in Wales will be received by Natural Resources Wales. The consultation for the River Wye in England will be a different consultation and representations to that will be received by either the Environment Agency or by Defra.

Proposed new salmon and sea trout rod fishing byelaws for the River Severn in Wales

Executive summary

This document reviews the status of salmon and sea trout stocks in the River Severn and recommends the introduction of appropriate fishery regulations, which reflect the current stock risk status, and are required to protect the reproductive capacity of these stocks. It is an interpretation for Wales of the technical case produced by the Environment Agency (EA).

Natural Resources Wales (NRW) has set an overall objective for salmon and sea trout stocks in Wales: -

“To protect, through the application of best-practice science and management, the sustainability of our natural resource of wild salmon and sea trout stocks in Wales.”

The EA technical case that NRW has adopted for the Severn in Wales, describes the status of stocks in the River Severn, considers issues around the exploitation of salmon and sea trout stocks, and sets out the options for sustainable management.

In recent decades the status of most of our stocks of migratory salmonids in Wales has declined: the Severn is no exception. There is a complicated range of factors that contribute to this, including the reduced survival of fish at sea, pressures on freshwater habitats (including water quality), and historic unsustainable fishing effort in high seas and other interceptory fisheries, including some fisheries in home waters.

NRW's solution is a broad range of proposed measures to address the numerous, complex causes of this problem, and to ensure that land and water are managed sustainably ([Read details of these measures in NRW's 'Plan of Action for Salmon and Sea Trout, 2020'](#)). The proposed byelaws are an integral component of this suite of measures as they would preserve vital breeding resources whilst other threats to relevant habitats are addressed.

Our position is that stocks may be exploited when they are sustainable, but that until they are, we must ensure that pressures are moderated or excluded in order to achieve this goal. In line with this position, we introduced the 'All Wales' and 'Cross border Dee and Wye (in Wales)' byelaws which came into force in January 2020, and mandate the release of all salmon caught by rod and net in Wales.

The EA technical case sets out the position and options for amended fishing controls to protect stocks of salmon and sea trout in the River Severn and presents concluding proposals for new byelaws to regulate fishing.

We recognise the need for a fully integrated approach for the catchments of our border rivers. NRW is working together with the EA to ensure that this happens in a practical and sensible way. Whilst NRW take the management lead for anadromous

fish in the cross-border rivers Dee and Wye, the EA take the same management lead for the River Severn.

The EA has carried out an identical consultation on the English part of the Severn. NRW has adopted the EA's technical case as the evidence used to support the proposed byelaws on the Severn in Wales. In this way, we seek to ensure that integrated and consistent arrangements are implemented across the whole catchment.

Previous time-limited regulations for salmon fishing on the River Severn in Wales need to be updated to ensure that salmon stocks are adequately protected. This is to ensure that those fisheries that continue to exploit these stocks do so in a sustainable manner that supports stock recovery.

The new proposed byelaws would supersede the current Emergency Byelaws mandating the release of all rod-caught salmon on the Severn and a prohibition on bait fishing before 16th June, that have been in place since 1st March 2021.

The proposals would bring in restrictions that are broadly aligned with the approach of the 'All Wales' byelaws that were introduced following a Local Inquiry in 2019 ([read the outcome of the Local Inquiry 'All Wales Salmon and Sea Trout Byelaws'](#)) and 'Cross Border Dee and Wye (in Wales)' byelaws that were introduced in 2020. These both require the release of all salmon, place restrictions on bait fishing, and set requirements to use barbless hooks, hooks of defined sizes, and restrict the number and type of hooks on spinners and plugs to maximise survival of released fish.

The proposed measures for the River Severn, adopted by NRW for the Severn in Wales, have been designed to enable rod fishing to continue in a sustainable way to maximise the opportunity for salmon stock recovery and to protect the sea trout stock. The proposed measures recognise and take into account the fact that the use of certain types of angling methods and gear types can result in increased fish mortality following catch and release, thereby reducing spawning escapement.

NRW have concluded, in light of the status and spawning deficits of Severn salmon and sea trout stocks which consequently are deemed unsustainable with risks of ongoing decline to unsafe stock levels, that the proposals are necessary, proportionate and reasonable.

Evidence

We have considered 2 principal sources of evidence in concluding our preferred option for management change:-

1. The status of adult stocks of salmon and sea trout
2. The status of juvenile salmon

Salmon

Conservation Limits serve as a 'limit' reference point below which further reductions in spawner numbers are likely to result in a significant fall-off in smolt production.

Compliance procedures require that spawning levels are above the Conservation Limit in four years out of five, (*i.e.* 80% of the time) for a stock to meet its 'Management Objective' (MO). The associated 'Management Target' (MT) (a 'target' reference point) defines the average stock level required to achieve this.

Estimates are produced annually and compliance tested each year. The position of the trend line and its confidence limits in relation to the Conservation Limit determines the risk status of the stock.

River Severn salmon populations have declined in recent years and egg deposition now falls well below the Conservation Limit (CL) (Figure 1). Achievement of this stock target is deemed necessary to sustain the population at a healthy and sustainable level. The Severn salmon stock has regularly failed to achieve its CL and is now classified as being "Probably at Risk" and is predicted to remain so in five years' time (Figure 2).

The current egg deposition figure equates to 875 spawning adult females whilst the number of spawning females equivalent to the CL is 1720: this therefore indicates a shortfall of 845 spawning females in 2019.

To offer greater protection to the stock, we set a Management Target (MT) which requires that, in the long run, the stock should exceed the CL in at least 4 years out of 5: this is the Management Objective (MO). Severn salmon stock assessments had been on an improving trend up to 2017, being classified as "Probably Not at Risk" at that time, but reduced stock assessments in 2018 and 2019 have meant that the classification has declined to the "Probably at Risk" category, and the ten-year trend is now declining.

The annual egg deposition, CL and MT for the Severn salmon stock for the last ten years are presented in Figures 1 and 2 below. The stock assessment indicates that the Severn salmon stock has only exceeded its CL in three of the last ten years, declining since 2015, to now only achieving a little over 50% of the CL in 2019.

Figure 1 Egg deposition estimates relative to the conservation limit and management target for the River Severn between 2010 and 2019.

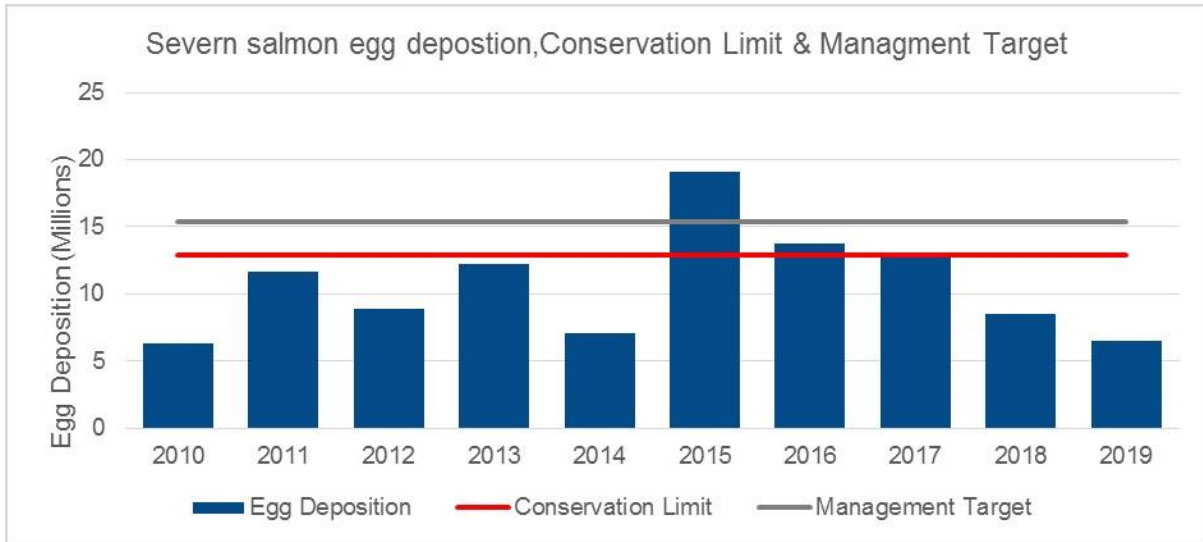
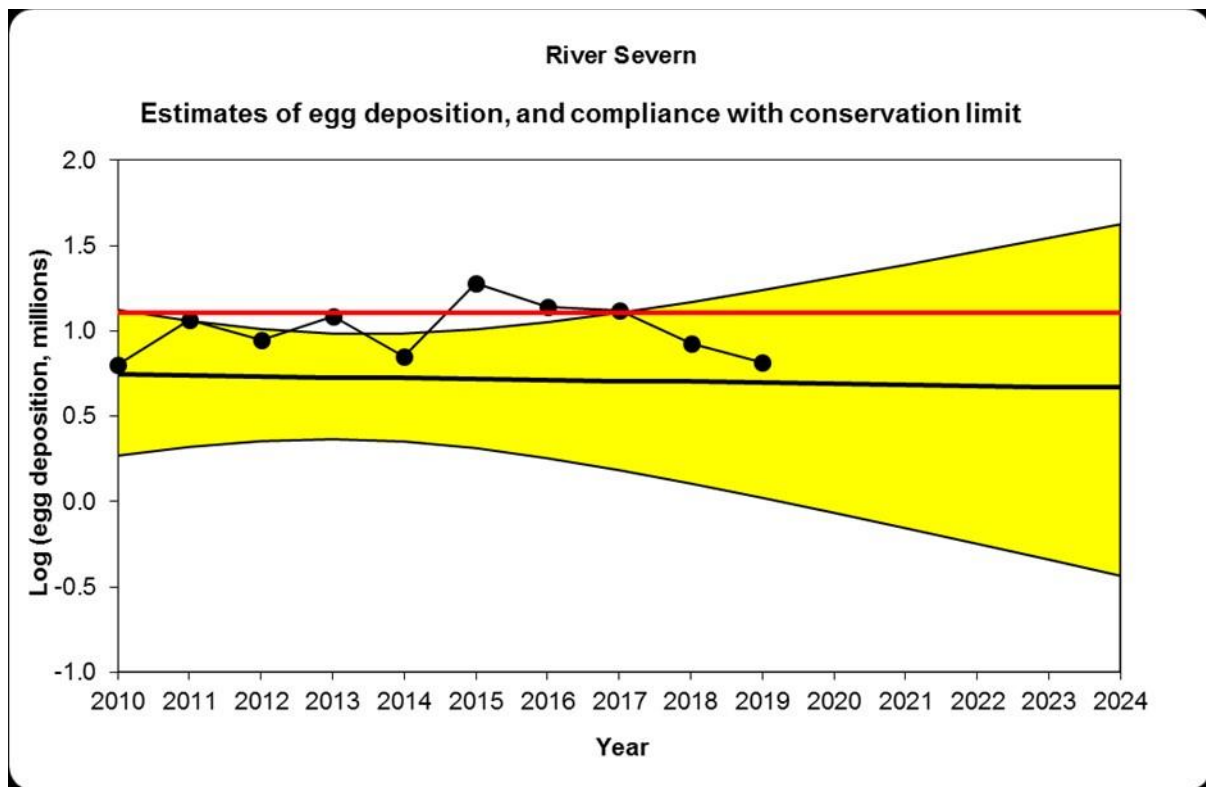


Figure 2 River Severn salmon spawning compliance assessment 2019.



Key to graph in figure 2

•	Annual egg deposition estimates
—	20 th Percentile trend line
—	Conservation Limit
■	Upper and lower boundaries of the Bayesian Credible Interval

Sea trout

The sea trout stock of the Severn is relatively small, with no historic records of substantially higher abundance, and no targeted fisheries for this species. Notwithstanding this apparent low stock level, we would not wish to see any increased exploitation of sea trout by the Severn fisheries at this time. For this reason, and also to avoid any possible mistaken identification between species, sea trout have been included in the proposed regulations.

Juvenile Salmonids

The average population densities of juvenile salmon recorded from fisheries surveys conducted in the upper Severn catchment were at their lowest recorded levels in the 2019 survey. This is likely to reflect reduced numbers of spawning adult salmon in the preceding two years, and also suggests that smolt production might be reduced in 2020 and 2021 with consequent reduced adult salmon returns in 2022 and 2023.

Average trout fry (0+) densities at upper Severn sites also tend to be low, ranging from one to four fry per one hundred square metres of stream.

Average trout parr (>0+) densities have also been relatively low across the upper Severn catchment in these surveys, rarely exceeding three parr per one hundred square metres of stream. Although low abundance of juvenile trout have been recorded in the past 8 years, the numbers appear relatively consistent.

Our Approach

Our aim for stocks in the “Probably At Risk” category is to recover these to the “Probably Not At Risk” category within 5 years. The continued killing of salmon by fisheries in such situations, and with such large spawning stock deficits, is not compatible with our aim of improving stock status, particularly when the prevailing stock trend is downwards.

Relatively small numbers of fish can be crucial in order to aid recovery of a stock, and it is noted that there will be cumulative benefit over time. It is therefore essential that spawning stocks are maximized if populations are to have the best chance of recovery.

If protective byelaws are not in place from the 2022 season onwards, then there would be reduced protection of the vulnerable salmon and sea trout stocks in the Severn (in Wales) when the current Emergency Byelaws lapse in March 2022.

In evaluating management options, conservation and sustainability of the salmon and sea trout resources should take precedence, following the principle of sustainable management of natural resources. The proposals are set in the context of maximising spawning escapement and promoting stock recovery towards improved resilience and sustainability.

The proposals would, if confirmed, implement byelaws requiring statutory catch-and-release fishing for all salmon and sea trout caught by rod and line on the River

Severn (in Wales) throughout the season. This would complement the proposed arrangements for the Severn in England.

Our proposals

NRW is proposing to seek confirmation of new byelaws for rod fishing on the River Severn in Wales. We propose the following measures to run from the date of confirmation until 31st December 2031, a date selected to synchronise with dates for the English catchment.

NRW is now seeking views on these proposals.

The proposed fishery management options for the River Severn rod fisheries, are as follows: -

- mandatory catch and release of all salmon and sea trout caught by rod and line;
- implementation of byelaws that control fishing methods, namely: -
 1. prohibition of bait fishing for salmon and sea trout;
 2. the use of barbless (or de-barbed) hooks only for fly fishing for salmon and sea trout;
 3. the use of single, barbless (or de-barbed) hooks with a maximum hook gape of no more than 13mm to be used with any artificial lures and spinners used to target salmon and sea trout;
 4. no more than 3 single, barbless (or be-barbed?) hooks with a maximum hook gape of 13mm to be fitted to wobbling or jointed plugs used to target salmon or sea trout;
 5. barbless (or de-barbed?) single, double or treble hooks used in conjunction with a fly for salmon and sea trout. The maximum hook gape of any double or treble hook used in conjunction with an artificial fly shall be no greater than 7mm, and 13mm for single hooks.

Your response

We would like your views on our proposals and invite you to submit these using the form designed for the purpose which is available via our consultation hub.

Respond to the consultation on proposed Severn in Wales byelaws [{LINK}](#)

Hard copies of the documents can be requested by emailing fisheries.wales@naturalresourceswales.gov.uk

Or by writing to:

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