

## Taking forward Wales' sustainable management of natural resources

### Consultation response form

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### About this consultation

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

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

### Question 1 –

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

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

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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Comments

MPA is on the whole disappointed by the scope and extent of the consultation. Unfortunately, the consultation document omits the contribution mineral products make to society and the economy. It also fails to recognise the contribution of minerals workings, both current and former, to enhance biodiversity or provide beneficial climate change adaptation such as flood alleviation. MPA would also question why the Natural Resource Policy has already been issued when this consultation seeks views on the principles behind the NRP.

That being said, the acknowledgement in the Ministerial Foreword that ‘... *sustainable management of our natural resources is a key contributor to green growth... ..contributes to addressing resource security concerns and creates growth and jobs...*’ is welcomed. To ensure the availability of a steady and adequate supply of minerals can be maintained to support Welsh Government’s policy ambitions – particularly in terms of the housing and transport and energy infrastructure needs that exist, the mineral products sector requires a clear, long-term policy and planning framework to ensure that the minerals required are available in the right location, at the right time.

However, while the sustainable management of natural resources should clearly include minerals, references are confined to the glossary alone.

Mineral products clearly lend themselves very well to circular economy thinking. Our main product, concrete, is 100% recyclable and very high rates of recycling and reuse already occur. Consequently, we would suggest that considerable progress has already been made by the sector to move beyond the “*take, make and dispose*” *extractive industrial model*’ that is referred to.

As highlighted in the MPA’s response to the **CONSULTATION TO INFORM THE DEVELOPMENT OF THE NATURAL RESOURCES POLICY (13th Feb 2017)**, cement manufacturing historically used only natural raw materials but the modern industry today contributes to the circular economy by:

- recycling mineral and metal content as well as recovering energy from fuels – known as ‘coprocessing’;
- taking wastes at the end of their valuable life;
- adding value via a quality product;
- restarting the value chain; and
- mainly finding use in durable and 100% recyclable concrete products.

The UK cement industry as a whole, uses 1.6mtpa of waste and by-products from other industries and has not sent process waste to landfill since 2012. As such it is doubly disappointing that the role of mineral products in providing essential materials for the Welsh economy and the environmental benefits of mineral processing and post-extraction restoration appear to have been omitted from the proposed policy approach.

With this consultation document, we would urge the Welsh Government to reconsider and ensure that minerals feature more prominently in any supportive policies.

## Question 2 –

### Delivery of Nature Based Solutions

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

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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### Comments

While there may be regulatory barriers, in many cases the practical issues around the ability to deliver added value opportunities through mineral development arise because of a lack of awareness or understanding within regulators – particularly beyond the immediate/short

term. Consequently, the ability for mineral development to deliver opportunities for biodiversity enhancement or to support climate change adaptation through water management, may not be so readily or easily realised.

There is an opportunity for Welsh Government to consider the benefits of recarbonation as an urban mimic of a forestry sequestration. While the science of recarbonation is well accepted and recognised in the field of Life cycle analysis, it has not yet been developed into national Green House Gas accounting. This is an issue that could be considered further, as Wales seeks more innovative approaches towards securing nature-based solutions.

### Question 3 –

## Support New Markets and Innovative Mechanisms

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

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input checked="" type="checkbox"/>
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### Comments

The minerals industry has, and continues to generate net gain opportunities in terms of nature based solutions.

MPA notes that sales of primary aggregate materials in Wales are already subject to an Aggregates Levy of £2/tonne, which generates in excess of £30m pa. This was introduced in 2002, with the intention to better reflect the environmental consequences of winning the materials. For such measures to secure the environmental benefits desired, it is essential that a portion of the revenue generated be re-invested into research, resources, services or outcomes that actively support environmental improvement, rather than simply becoming a revenue-generating mechanism. In the case of the Aggregates Levy in Wales, the investment in such projects was stopped in 2016, ending the potential opportunities for the Levy to support community, nature conservation and industrial heritage projects in areas impacted by aggregate extraction.

In the event that it may be considered necessary to introduce additional market mechanisms, such as the payment for ecosystem services (PES) cited in the consultation, it will be essential that such measures be introduced on a consistent basis across all industrial activities & uses to avoid distorting the market, it is important that any additional market measures that may be introduced do not duplicate any existing arrangements that are already in place, such as the Aggregates Levy.

MPA observes that consultation document advocates the use of cap and trade systems. It should be noted that there are significant disadvantages to cap and trade systems that are operated in isolation as has been demonstrated by the EU ETS and the lack of emissions trading globally. The disadvantages increase as the geographical scale reduces, so there is a risk that Wales could potentially put itself and its businesses at a disadvantage when compared to the rest of the UK.

### Question 4

## Forestry

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

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input checked="" type="checkbox"/>
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## Comments

MPA notes that the consultation document recognises that Wales is one of the least wooded countries in Europe. Further, single species woodland and timber providing forests remain a biodiversity issue and should be addressed.

Forests can provide a very useful carbon sink, but only when they are trees and not timber. As a construction material, timber has a short useful life and at end of life it is either burnt (releasing CO<sub>2</sub>) or landfilled (releasing higher impact methane). Care must therefore be taken when promoting wood in construction, because timber is very different (in terms of its production, use and after use environmental impact) from cross laminated timber or wood panels.

Favouring timber over other construction materials that may be perceived as having higher embodied carbon, such as concrete, without considering the impact this might have on carbon emissions and energy consumption further down the supply chain, such as the buildings produced using these materials, would be short-sighted. Cement is one of the ingredients in concrete and although the embodied carbon of cement is relatively high (as are the glues used in fabricated timber), concrete/masonry remains a low carbon product that is locally produced. The high thermal mass properties of concrete, when used correctly in buildings, enables the storage and then slow release of heat. This has the effect of stabilising the temperature within a building so that less heating is required in winter and less cooling is required in summer. These benefits are realised year-round, as the diurnal temperature cycle peaks are reduced. This in turn reduces the energy demand of buildings such that the embodied carbon dioxide of a typical building can be “paid off” within 11 years. This ‘demand side flexibility’ offered by heavy weight buildings could be a key solution to the growing imbalance between energy demand and renewable energy generation.

As space heating alone accounts for around 20 to 50 per cent of a building’s energy consumption depending on type, and around a third of the carbon emissions from all UK buildings, concrete can make a valuable contribution to reducing emissions in residential and service sectors.

Consequently, care must be taken to ensure that any policy position that looks to promote one particular type of building material, does so on the basis of a robust and comprehensive understanding of the full life time costs of that product, including the buildings and end-uses that they support.

We must emphasise that material preference is anti-competitive and will not deliver the most sustainable or cost-effective outcomes for our built environment. Furthermore, this approach is counter to and undermines the current standards such as BREEAM and The Code for Sustainable Homes. Rather than any pre-determined presumption, it is essential that Welsh Government natural resource management policy supports a level playing field where the right construction material is specified for the right project in order to take account of the building resilience challenges of climate change, such as flood, combustion, overheating, extreme weather events.

### Question 5 –

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

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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## Comments

No comment

**Question 6 –**

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

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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Comments

No comment

**Question 7 –**

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

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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Comments

No comment

**Question 8 –**

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

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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Comments

No comment

**Question 9 –**

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

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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Comments

No comment
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### Question 10 –

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

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input checked="" type="checkbox"/>
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Comments

The designation of TPOs is well catered for under the Town and Country Planning Legislation. Any proposed changes to the legislation should be incorporated through existing T&CP legislation, and should be reasonable, necessary and proportionate.
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### Question 11 –

#### Designated Landscapes

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

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Not sure	<input type="checkbox"/>
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Comments

MPA consider there is already a clear, distinct and well established policy framework for NPs and AONBs. To introduce a further suite of criteria at this time, which sought to align these designations with the sustainable management of natural resources, a theme which is still emerging and evolving, has the potential to introduce additional regulatory burden and create considerable confusion.
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### Question 12 –

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

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Not sure	<input type="checkbox"/>
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#### Comments

MPA consider that the weight accorded to the special qualities within the designated areas is already defined in Welsh Planning Policy. A national overview is essential given the often, contradictory positions, that can arise depending whether issues are viewed at a local, regional or national scale.

#### Question 13 –

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

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Not sure	<input type="checkbox"/>
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#### Comments

MPA consider there is no clear justification for further legislation at this time. Creating a wider range of areas and their associated partnerships has the potential to cause confusion and ultimately undermine the status of the existing NPs and AONBs. It would also potentially constrain development opportunities which meet society's needs. The comments made under Question 12 (around the importance of a national overview to ensure consistency of approach/outcome) are equally relevant here.

#### Question 14 –

Are there any other aspects of the Future Landscapes: Delivering for Wales report where you believe a legislative provision is necessary?<sup>1</sup> If so, please explain which and why.

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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#### Comments

No comment

#### Question 15 –

#### Access to Outdoors

<sup>1</sup> <http://gov.wales/docs/desh/publications/170508-future-landscapes-delivering-for-wales-en.pdf>

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

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input checked="" type="checkbox"/>
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**Comments**

<p>Any proposals to expand recreational uses within the countryside must pay due regard to existing rural land uses such as agriculture and mineral extraction. Damage to crops and livestock and unauthorised entry to mineral working is often costly and can result in risks to public health and safety. Therefore, maintaining the ability for landowner to manage their existing (or indeed any future) permitted land use, while ensuring public safety will be essential.</p> <p>A greater challenge will be around managing the expectation of recreational users, particularly around their perceived rights to access in-land water areas, given the recurring issues around illegal access and trespass that occur in disused quarries, and the potentially fatal consequences that can result. Any proposed changes must not place unnecessary additional burden or risk/liability on legitimate activities.</p>
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**Question 16 –**

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

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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**Comments**

No Comment
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**Question 17 –**

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

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input checked="" type="checkbox"/>
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**Comments**

<p>MPA consider this to be unlikely. Regulatory change has the potential to create further confusion, particularly as the consequences of such regulatory changes and the associated practicalities and costs associated in delivering those requirements may not be properly understood. It is the unintended consequences of new regulations which generally create the problems.</p> <p>As outlined in the response to the previous question, there is likely to be a particular challenge managing the expectation of recreational users, particularly around their perceived rights to access in-land water areas. Given the recurring issues around illegal</p>
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access and trespass that already occur in disused quarries, and the potentially fatal consequences that can result, the significance of these unintended consequences arising from regulatory change should not be underestimated.

**Question 18 –**

**Marine and Fisheries**

**Marine**

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

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input checked="" type="checkbox"/>
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**Comments**

Although there are no express provisions for lower level plans that sit underneath plans produced at the national scale, there are equally no express provisions that prevent this from happening. Given the different scales of evidence, use and management that occur across Welsh seas, there will inevitably be differences in the granularity of evidence that is available and the associated management that takes place across the national marine plan that is being prepared.

Where there is a need to adopt more local provisions, it should be possible to introduce these within the existing marine plan provisions, rather than requiring new powers necessarily. This would avoid any confusion around the relationship/status of the WNMP compared to any local/regional version that may be produced.

Given the role and importance of the UK Marine Policy Statement, it is important that the Welsh National Marine Plan process and the associated governance that underpins it is consistent with those plan processes that are being developed in adjacent marine areas – particularly given so many uses and activities (such as marine aggregate extraction) take place across wider marine plan areas.

**Question 19 –**

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

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input checked="" type="checkbox"/>
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**Comments**

As per the response to Q.18, whatever the scale of the plan adopted, the principles and policies it contains must be proportionate, consistent and reflect adjacent plan areas.

While it may be necessary to provide some degree of regional or local emphasis, this must not be prepared in isolation. Such emphasis should recognise “the bigger picture”, i.e. that many users within the plan area operate at the broader scale across regional boundaries, and that for marine management to be effective there is a requirement to manage activities at a regional seas scale.

**Question 20 –**

## Fisheries

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

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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Comments

No comment
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## Question 21 –

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

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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Comments

No comment
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## Question 22 –

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

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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Comments

No comment
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## Question 23 –

## Water

## Abstraction Reform

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

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Not sure	<input type="checkbox"/>
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### Comments

Given many of our members operate across Wales and England, MPA believe it would be preferable to adopt a wider, more consistent approach towards regulatory reform. A divergence of regulatory approach has the potential to introduce inconsistencies and duplication of effort for operators, and would appear to be at odds with the catchment-scale approach to water management that has been pursued to date across Wales and England.. Care must be taken to ensure that the changes being considered do not work against the wider theme of natural resource management that is being pursued, given the scale and geographic extent of catchment areas and the activities that interact with them. Consideration should also be given to the economic consequences of any such changes resulting in an uneven regulatory environment that effectively disadvantages those activities taking place in the Welsh portion of a catchment, compared to those taking place in England.

## Question 24 –

### Drainage Reform

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

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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### Comments

No comment

## Question 25 –

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

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

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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### Comments

No comment

### Question 26 –

#### Waste and Local Environment Quality

##### Waste – Powers of Entry

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

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

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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Comments

No comment

### Question 27 –

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

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

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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Comments

No comment

### Question 28 –

#### Environment – Littering from Vehicles

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

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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Comments

No comment

**Question 29 –**

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

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

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input checked="" type="checkbox"/>
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Comments

Conceptually, the use and adoption of basic measures to help support the sustainable management of natural resources by managing low risk activities clearly has some merit and should be supported in principle. However, there is limited information in the consultation document to help understand how this would apply and be delivered in practice to form a more considered view. Like all new regulatory controls, there is a risk that the requirement could introduce additional bureaucracy and cost across a wide range of activities for limited environmental benefit, therefore the MPA will reserve its position until such time that further details are available. A further process of consultation and engagement on this matter should take place to detail the scope of the “basic measures” proposed before any new measures are implemented.

**Question 30 –**

### **Agriculture**

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

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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Comments

No comment

**Question 31 –**

### **Wildlife**

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

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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Comments

No comment
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**Question 32 –**

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

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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Comments

No comment
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**Question 33 –**

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

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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Comments

No comment
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**Question 34 –**

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

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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Comments

No comment

**Question 35 –**

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

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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Comments

No comment

**Question 36 –**

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

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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Comments

No comment

**Question 37 –**

**Assessment of Policy Proposals**

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

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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Comments

While recognising the role and purpose of natural resource management, it is important that the environmental issues associated with Welsh industry are able to be addressed in the context of wider social and economic considerations i.e. Well-being of Future Generations Act 2015 (WFG Act).

The mineral products industry is a key employer in Wales – providing direct employment to around 3,800 people at more than 200 sites and generating sales of £650m, twice as many people per head of population are employed in the mineral sector in Wales than in the rest of Great Britain, and more than 90 per cent of these jobs are full-time. By contrast, across the Welsh economy as a whole only 35 per cent of jobs are full-time. The mineral products sector therefore provides an increasingly valuable commodity for Wales – full time employment opportunities. The majority of those jobs are in rural areas where there are limited opportunities for secure employment. It has been estimated that more than 2,000 people are indirectly employed supporting the sector, largely through the energy, transport and contracting services it requires.

While the industry is significant in its own right, it is important to recognise the vital role it plays in supporting the Welsh constructor sector, which represents six per cent of the Welsh economy, has a turnover of £3 billion and provides 88,000 jobs.

The value and importance of the Welsh mineral products industry extends well beyond Wales though. As an example, while Wales only has two cement plants, these represent strategic assets for Great Britain and service a much broader concrete and construction supply chain. However, their presence in Wales brings significant social and economic value. The same applies to the mineral resources produced from Welsh quarries, with many resources being exported for use further afield, such as the strategically important high polished stone value (PSV) sandstone used in road surfacing.

Mineral products represent the largest material flow in the national economy, and the industry plays a crucial role in supporting the delivery of Welsh Government's ambitions around growth and sustainable development as well as supporting the wider UK economy.

Consequently, it is essential that the sustainable management of natural resources in Wales recognises and takes full and proper account of both the role and wider contribution of the mineral products sector.

### Question 38 –

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

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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### Comments

No comment

### Question 39 –

Do you think the proposed policy proposals could be formulated or changed? so as to have positive effects or increased positive effects on opportunities for

people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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Comments

No comment
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**Question 40 –**

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

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Not sure	<input type="checkbox"/>
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Comments

<p>In our response to a number of questions, MPA has highlighted the need and importance for Welsh policy and regulation to not diverge too far from other national environmental jurisdictions. Many mineral product companies operate across Great Britain, and differences in policy and regulation not only add cost and inefficiencies, but more fundamentally also influence where companies want to operate and invest.</p> <p>Given the ongoing political and economic uncertainties, Welsh Government should be mindful of the potential consequences of policy and regulatory change given the importance of stability and certainty to business.</p>
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Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here: