national gas transmission

Biodiversity and Resilience of Ecosystems in Wales

Section 6 duty report 2025
Environment (Wales) Act 2016 Part 1 - Section 6

December 2025

Contents

Cover image: Sensitive moorland habitat restoration near Dowlais, see case study on page 11.

1. Introduction and context

National Gas Transmission plc (National Gas) is committed to delivering gas safely, reliably and efficiently to the customers and communities we serve. We own, manage and operate the high-pressure gas transmission network across Great Britain, which includes significant assets in Wales.

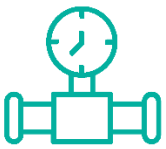
Our purpose at National Gas is to lead a clean energy future for everyone; we will do this by keeping gas flowing to businesses and homes. We also understand our responsibilities for future generations; we will be delivering the transition towards cleaner sources of energy by adapting around 1,250 miles of Britain's gas transmission pipelines, along with some new-build, to deliver a hydrogen backbone for the UK by the early 2030s. As we move towards this goal, and in managing our current assets, we will continue to take actions to maintain and enhance biodiversity, promote resilient ecosystems and minimise environmental impact across our operations.

The NTS at a glance

Our gas National Transmission System (NTS) makes gas available when and where it's needed. The NTS is made up of high-pressure pipelines, above ground installations (such as valve compounds) and compressor stations (which increase the flow and pressure of gas in the system).

Around 8,000 kilometres of high-pressure pipelines

More than 500 above ground installations



>60 compressors across 21 compressor stations

This document fulfils our Biodiversity and Resilience of Ecosystems Duty to report under Section 6 of the Environment (Wales) Act 2016. This legislation sets a framework for the Welsh Government's Nature Recovery Action Plan (NRAP) for Wales, which is a strategic plan to deliver biodiversity gains through six objectives:

- Engage and support participation and understanding to embed biodiversity throughout decision making at all levels
- Increase the resilience of our natural environment by restoring degraded habitats and habitat creation
- Improve our evidence, understanding and monitoring
- Safeguard species and habitats of principal importance and improve their management
- Tackle key pressures on species and habitats
- Put in place a framework of governance and support for delivery

National Gas, as a public authority[1], has a specific requirement to maintain and enhance biodiversity and promote the resilience of ecosystems by making these issues an integral part of our policies, business decisions and day-to-day actions and to publicly report progress every three years.

Where our monitored actions, measures and indicators align with the six objectives of the Nature Recovery Action Plan (NRAP), these are highlighted through this document.

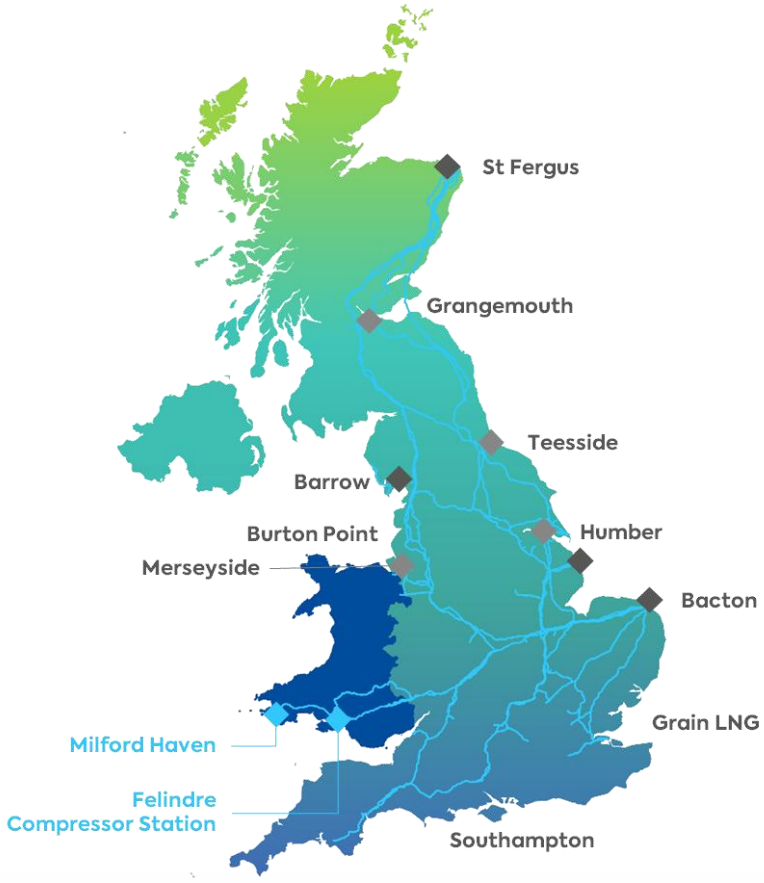
[1] We are a shareholder owned Public Limited Company (PLC), but as a gas transporter (within the meaning of Part 1 of the Gas Act 1986 (c. 44)) we are classed as a statutory undertaker in Wales, falling within the definition of public authority.

National Gas Transmission plc in Wales

Within Wales we own and manage gas assets and are responsible for managing the energy infrastructure and the non-operational land holdings under our direct control and ownership. Our assets include the major pipeline route which transports gas imported to the UK from the Liquified Natural Gas (LNG) terminals at Milford Haven in south-west Wales.

Where our energy networks cross third party owned land, we work in co-operation with our grantors to ensure the safety and reliability of our networks. Our assets interact with a wide range of Welsh habitats, from agricultural land and grassland mosaics to wetland, woodland and riparian (riverside) environments.

We are investing in our network and upgrading our infrastructure. Biodiversity considerations are central to how we plan, maintain, and upgrade infrastructure in ways that avoid and minimise environmental impact, preserve the natural environment and biodiversity and foster collaboration and partnership with others.



"Across Wales, we will ensure that our essential works are done in ways that minimise negative impacts to the environment and seek opportunities to deliver enhancements."

Welsh habitats can be sensitive and hugely variable, from mountains and moorland to lowlands and coastal reaches

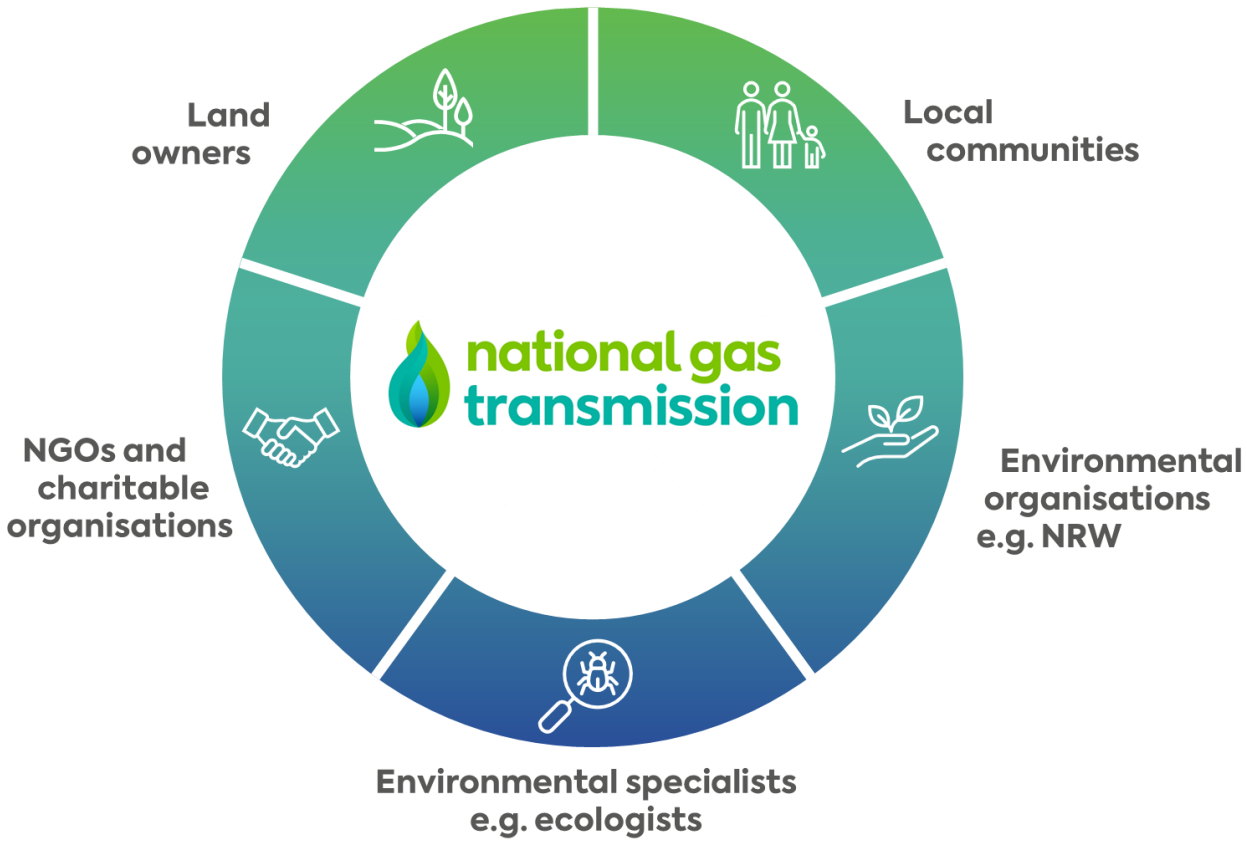
Our commitment to biodiversity

Biodiversity is embedded within our wider corporate sustainability commitments, policies and development processes. Following assessment of all our land in the financial year from 2021 to 2022, we established the total habitat area is 878.16 hectares and we have a baseline of 4,165.61 biodiversity units.

As we upgrade our network and facilitate a transition to cleaner energy sources, we work closely with communities, partners and stakeholders to ensure that essential works avoid, minimise, or offset environmental impacts and seek opportunities for enhancement. Later sections of this report explain how we do this and provide examples of recent projects showing how we have put these commitments into practice.

Working with others

We will continue to work with strategic partners, environmental organisations and specialists and other stakeholders to seek opportunities to collaborate, drive shared value from our land, protect and enhancing the natural environment and the benefits and services it provides. This will ensure that the impacts associated with our energy network, current and future, are minimised, and enhancements delivered hand-in-hand with a low carbon future.



Aligned objective

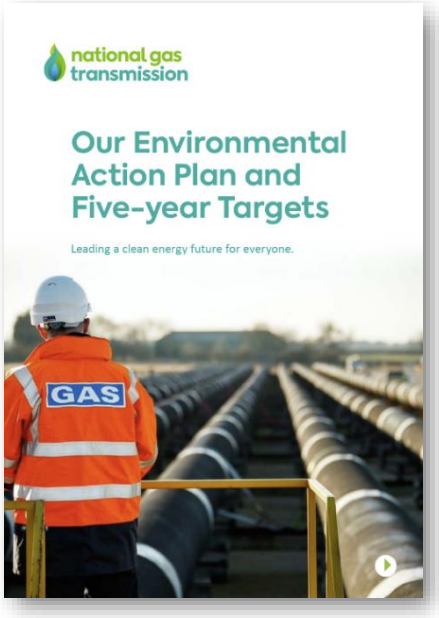
NRAP Objective 1: Engage and support participation and understanding to embed biodiversity throughout decision making at all levels

2. Delivering our section 6 duty requirements

Consideration and management of the natural environment forms a key aspect of our corporate commitments, sustainability targets, strategies and network development processes. Impacts and opportunities associated with the land that we own and manage are embedded within our processes.

This approach aligns with Ofgem's environmental focus areas for the RIIO-T2 regulatory period, in particular the reduction of the network's other (non-methane) environmental impacts, i.e. pollution to local environment, resource use and waste management, and biodiversity loss.

Our Environmental Action Plan



Our corporate Environmental Action Plan (EAP) concentrates on the areas where we can make the greatest contribution to a more sustainable future, aligned to the United Nations' Sustainable Development Goals.

It responds to, and is driven by, environmental issues which are most significant to our stakeholders and our business; these include protecting and enhancing our natural environment and promoting biodiversity. We are committed to reducing our negative impacts and focusing on the areas where we can bring about positive change. Our dedicated Environmental & Sustainability Team are responsible for reviewing our performance and commitments.

Our current EAP demonstrates how we work together with our employees and stakeholders to reduce our impact on the environment. It sets out 30 commitments that help guide and measure our performance against each target to the end of our current regulatory period (RIIO-T2 in March 2026). Our EAP commitments will continue and be developed into our next regulatory period (RIIO-T3) which ends in March 2031.

Each EAP commitment is driven by both legislative and non-legislative factors and grouped under five pillars. Each of these pillars will reduce our impact on the environment and increase the natural capital on and around our sites; there are two which specifically align to biodiversity. These are:

- **Caring for the natural environment**
  Whenever we deliver construction and decommissioning projects, there is a requirement to ensure that appropriate measures are taken to protect and promote biodiversity. We are, and will continue to do this, through enhancing the value of natural assets on non-operational land that we own, through habitat improvement.
- **Leadership for change**
  We are embedding sustainability in our decision-making, continuing to be transparent on our progress and working with the industry to drive forward the sustainability agenda.

Commitments in action

Eight of our 30 EAP commitments relate to the two pillars outlined above.

Environmental pillar	Environmental commitment	Description of commitment
 **Caring for the natural environment**	Achieve a 10% increase in environmental value on non-operational land by the end of the RIIO-T2 period.	Biodiversity Net Gain (BNG) calculation tools are used to assess how land can be developed and to enhance the value of ecosystems.
	Act as custodians of our redundant sites by ensuring that we reinstate them to deliver a BNG in environmental value where we are not restricted.	Where possible we aim to incorporate environmental value enhancement on redundant sites to deliver a BNG. Restrictions such as planning conditions may impact how redundant sites can be managed.
	Educate the public about environmental issues through outreach linked to major compressor station emission reduction projects.	Engage with local community through school visits, local talks, including the environmental impact of our major projects.
	Deliver 10% BNG in environmental value (including biodiversity) on planned construction projects (including where we delivery through third parties).	Our BNG target is applied on all schemes that lead to permanent or temporary habitat loss, negative impacts on the habitat condition or provision of ecosystem function e.g. screening, flood management, recreation.
 **Leadership for change**	An engaged workforce on environmental issues that leads by example.	We are implementing a comprehensive employee engagement programme on environmental issues including emissions, waste, reduction in plastics and employee travel.
	Produce an Annual Environmental Report (including our Business Carbon Footprint).	Publish Gas Transmission environmental performance annually allowing feedback from stakeholders.
	Lead in transparency on capital carbon and natural capital reporting.	We will drive forward industry in areas of sustainability where we are leading. We will work collaboratively through industry working groups to deliver this. We will focus on two areas: natural capital/BNG and capital carbon.
	Fully embed sustainability in decision making.	Carbon pricing is influencing decisions and whole life costing is assessed in the decision-making process.

Our 10% biodiversity enhancement target

At National Gas, we made a policy commitment to deliver net gain of least 10% or greater in environmental value (including biodiversity) on all our construction projects before this was enshrined in law in England via the Biodiversity Net Gain (BNG) requirements. These set a baseline number of biodiversity units and require developers to improve biodiversity by a minimum of 10%.

In Wales, the biodiversity gain regime is termed "Net Benefit for Biodiversity" (NBB). While the regimes are similar in their intent to deliver an overall improvement in biodiversity, in Wales NBB does not use a metric-based approach like BNG (and nor does the equivalent regime in Scotland). Nonetheless, for consistency and to align with our company policy, we apply a similar approach to all our projects, whichever region they are delivered in and are confident that this meets all central and devolved government requirements.

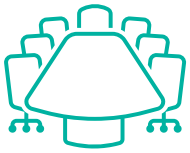
Engaging our colleagues and accounting for our actions

We want to have a workforce (both our direct employees and our contractor teams) that are engaged on environmental and sustainability issues and who lead by example.

We continue to support our employees through training, environmental working groups, guides and manuals, and our contractors through our established procurements frameworks and call-off contracts.

Our senior leadership take accountability for our environmental performance and to drive any commitments back 'on track' if we have any concerns that they may not be achieved.

Our Environment and Sustainability Awareness training is mandatory for all our employees; 97% have competed this training in the last 3 years



Our directors are fully accountable for our environmental commitments

3. Our environmental sustainability strategy

To support delivery of our commitment to biodiversity, we have established an environmental sustainability strategy, supported by policies to drive our objectives and direct our business processes and decisions.

Our environmental sustainability strategy is underpinned by our Environmental Management System (EMS) and Environmental Sustainability Policy.

ISO14001 Environmental Management System

Aligned to the delivery of our corporate commitments and Environmental Sustainability Policy is our EMS. This is certified to ISO14001:2015, providing a robust framework for managing our environmental impacts and opportunities including biodiversity and ecosystems. Our EMS was recertified to the ISO14001: 2015 standard in 2025.

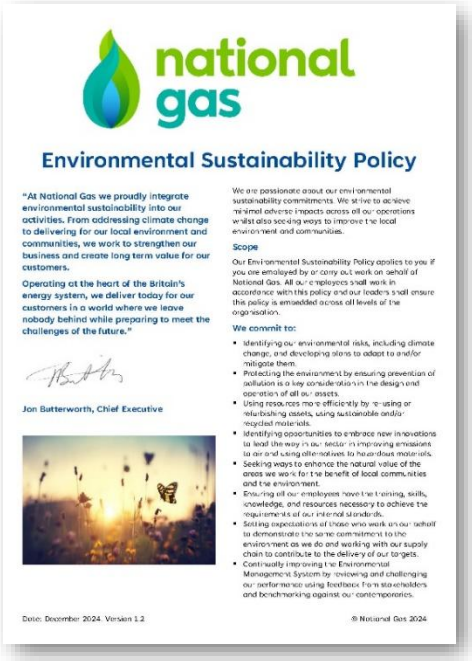
As part of our EMS, all UK employees are required to undertake environmental awareness e-learning training. The training module includes awareness and training related to managing impacts and opportunities associated with habitats and biodiversity. Our EMS auditing and assurance processes include assessment of how we manage the impacts and opportunities associated with the natural environment and biodiversity.

EMS audit at one of our stations

Environmental Sustainability Policy

Our Environmental Sustainability Policy applies to everyone that is employed by or carries out work on behalf of National Gas. All our employees work in accordance with this policy, and our leaders ensure this policy is embedded across all levels of the organisation. Several of our Environmental Sustainability Policy commitments align to our objectives around biodiversity and enhancing the natural environment; these are outlined overleaf.

"At National Gas we proudly integrate environmental sustainability into our activities. From addressing climate change to delivering for our local environment and communities, we work to strengthen our business and create long term value for our customers."



national gas

Environmental Sustainability Policy

"At National Gas we proudly integrate environmental sustainability into our activities. From addressing climate change to delivering for our local environment and communities, we work to strengthen our business and create long term value for our customers.

Operating at the heart of Britain's energy system, we deliver today for our customers in a world where we leave nobody behind while preparing to meet the challenges of the future."

Jon Butterworth, Chief Executive

We are passionate about our environmental sustainability commitments. We strive to achieve minimal adverse impacts across all our operations whilst also seeking ways to improve the local environment and communities.

Scope

Our Environmental Sustainability Policy applies to you if you are employed by or carry out work on behalf of National Gas. All our employees shall work in accordance with this policy and our leaders shall ensure this policy is embedded across all levels of the organisation.

We commit to:

- Identifying our environmental risks, including climate change, and developing plans to adapt to and/or mitigate them.
- Protecting the environment by ensuring prevention of pollution is a key consideration in the design and operation of all our assets.
- Using resources more efficiently by re-using or refurbishing assets, using sustainable and/or recycled materials.
- Identifying opportunities to embrace new innovations to lead the way in our sector in improving emissions to air and using alternatives to hazardous materials.
- Seeking ways to enhance the natural value of the areas we work for the benefit of local communities and the environment.
- Ensuring all our employees have the training, skills, knowledge, and resources necessary to achieve the requirements of our internal standards.
- Setting expectations of those who work on our behalf to demonstrate the same commitment to the environment as we do and working with our supply chain to contribute to the delivery of our targets.
- Continually improving the Environmental Management System by reviewing and challenging our performance using feedback from stakeholders and benchmarking against our contemporaries.

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The following table summarises relevant commitments from our Environmental Sustainability Policy

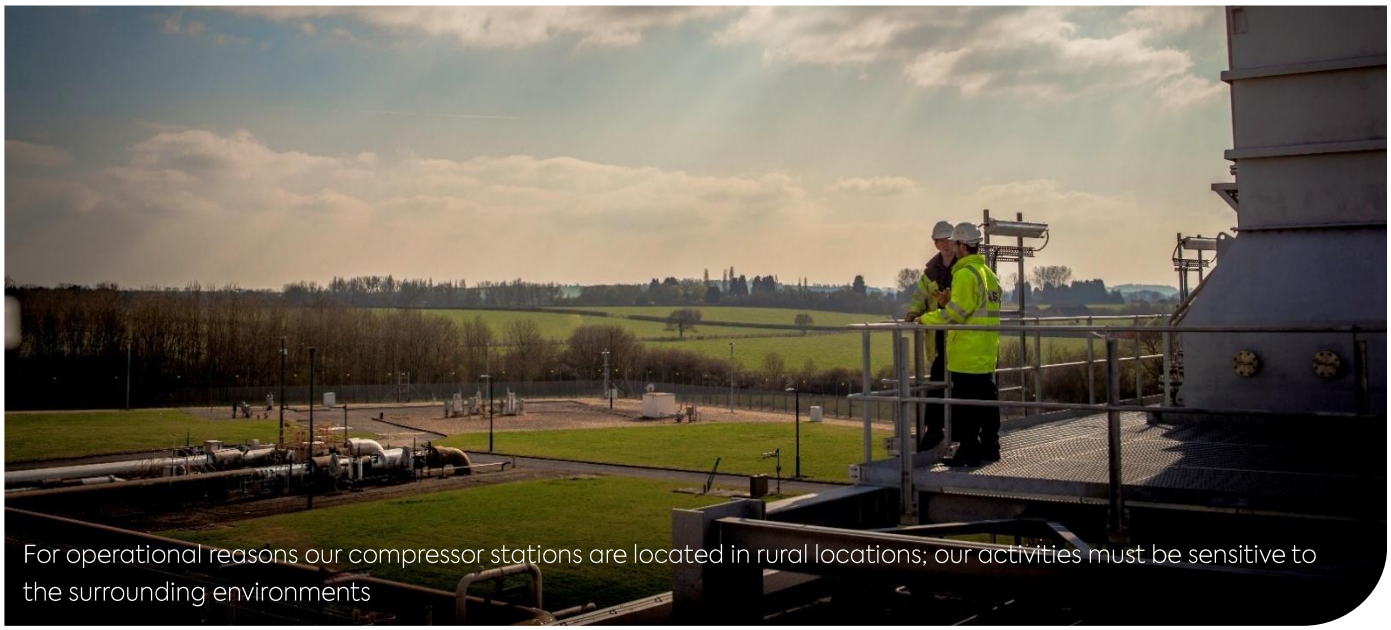
Relevant Environmental Sustainability Policy commitments
• Protecting the environment by ensuring prevention of pollution is a key consideration in the design of all our assets.
• Using resources more efficiently by using sustainable materials and reducing waste.
• Identifying opportunities to use alternatives to hazardous materials.
• Seeking ways to enhance the natural value of the areas we work for the benefit of local communities and the environment.
• Ensuring all our employees have the training, skills, knowledge and resources necessary to achieve the requirements of our internal standards.
• Setting expectations of those who work on our behalf to demonstrate the same commitment to the environment as we do and working with our supply chain to contribute to the delivery of 'Our Contribution' targets.

Our policy commitments in practice

The majority of our above ground installations and compressor stations are in rural areas and often make use of local watercourses to dispose of clean rainwater. We use layers of stringent pollution prevention measures to protect these sensitive environments.

The non-operational land we own is carefully managed by our in-house land specialists, supported by carefully selected contractors

Our project delivery teams implement our commitments to deliver biodiversity gains and restore and enhance habitats on completion of the work.



For operational reasons our compressor stations are located in rural locations; our activities must be sensitive to the surrounding environments

4. Our processes and practices

Key to driving improvement in the natural environment is embedding the consideration of biodiversity into our processes and having an engaged workforce that will ensure our objectives are delivered in practice.

We have a number of processes and methods to understand, measure and inform decisions on how we manage the natural environment and biodiversity across our land. These are integrated into our governance processes and thus inform the way we make decisions throughout the business. This means they have a direct influence over how we manage and execute our projects and go about our activities on a day-to-day basis.

Options Appraisal, pipeline routing and site selection

When we develop major new gas infrastructure (which may include hydrogen, carbon dioxide or methane (natural gas) based systems), we carry out Options Appraisal on our projects. Options Appraisal allows us to compare options and to assess the positive and negative effects they may have across a wide range of criteria including environmental, socio-economic, safety, availability, reliability, and financial factors.

This enables us to select the option which best balances these considerations and clearly document the reasoning that underpins our decisions. The information we collect as part of Options Appraisal goes on to inform discussions with stakeholders, including the public.

For environmental topics we assess the wider impact to the environment associated with our development options. Options which avoid or reduce impacts on environment, local communities, and areas of economic activities are generally preferable.

Wherever possible we seek to avoid negative effects on nature conservation; in particular we assess the likely effects of each option on sensitive receptors. These include Special Areas for Conservation (SACs), Special Protection Areas (SPAs), Sites of Special Scientific Interest (SSSIs) and other features of nature conservation value (which may include sites that have no official designations but are valued by and important for the wellbeing of local communities). When comparing options, those which avoid or mitigate impacts on sites of importance for ecology or biodiversity will be considered advantageous.

Environmental topics in options appraisal	Options likely to score highly
• Ecology • Geology and soils • Historic environment • Landscape and visual • Water • Climate change	• Landscape and visual: minimise impacts on views and sensitive areas • Ecology: avoid protected habitats (e.g. SSSIs, SACs) • Historic environment: avoid listed or culturally significant sites • Water, air, noise, soils: assess and minimise risks

FEA process

We have an established Formal Environmental Assessment (FEA) process for gas transmission projects which have the potential to impact on the environment; we have used and updated this system for over 10 years now, in which time it has become 'business-as-usual' for us. The FEA process covers the full range of potential environmental and sustainability concerns which are faced during project design and delivery. In respect of the natural environment and biodiversity, FEA ensures we are accountable for:

- Carrying out timely and appropriate ecological surveys
- Baselining habitats
- Carrying out natural capital and biodiversity assessments
- Conducting sustainability reviews with our contractors
- Designing site management plans and ecological mitigation measures
- Implementing our mitigation measures before, during and after construction, including the long-term management of land needed to deliver biodiversity commitments

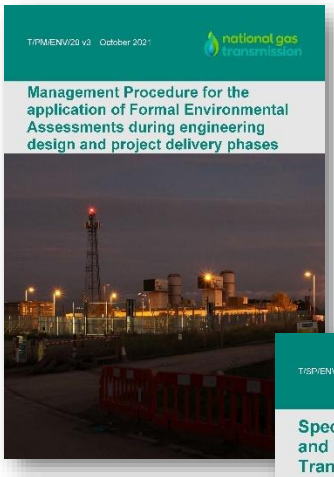
Our Environmental & Sustainability Team provide expert support to projects and the operational business. Where we need additional expert advice and support, we have a team of external consultants on standby as part of our environmental services framework.

The 'ENV' suite

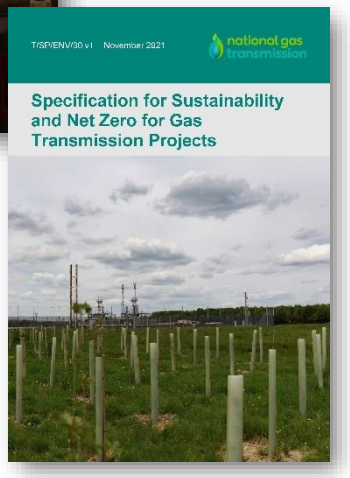
Our FEA process is supported by a series of management procedures and specifications covering key environmental and sustainability topics that we have developed to outline the expectations we place on our delivery teams and contractors. We call this the 'ENV' suite of documents.

These procedures document the workflow, or steps, that our teams must follow at each stage of a capital project from the earliest stages of design, through securing planning permission and environmental permits to site work and then project close.

The ENV suite of documents follow the 'Plan-Do-Review-Report' approach to management systems and ensure we approach all projects consistently and with a full understanding of the relevant issues.



T/PM/ENV20: Management Procedure for the application of Formal Environmental Assessments during engineering design and project delivery phases



T/SP/ENV30: Specification for Sustainability and Net Zero for Gas Transmission Projects

Assessing natural capital and biodiversity on our projects

Our approach to protecting natural capital and enhancing biodiversity starts with designing projects to avoid as much environmental harm as possible, we do this using techniques such as Options Appraisal outlined earlier and by carrying out detailed environmental assessments in early feasibility stages under our FEA governance process.

Depending on the nature and scale of the project, we have a range of tools which we use, often supported by our specialist contractors, to assess the value of our natural capital and biodiversity enhancement requirements. These tools allow us to understand the value of our natural capital, quantify any predicted impact and then design ecological mitigation and enhancement plans for each project.

This approach applies to the proactive management approach to our own estate, and any new sites and land holdings acquired to facilitate development of our energy networks.

Use of these tools is integrated into our FEA governance process, to make sure the right assessments are undertaken at the right time.

Delivering enhanced natural capital and biodiversity on our projects

The natural assets (woodlands, grassland, wetlands) that we own provide a wide range of benefits and services to both public and private beneficiaries e.g. carbon sequestration and storage, local air quality benefits, pollination, recreation and flood management. Where we can, we use this natural capital base to deliver mitigation and enhancement close to where any impacts occur.

The measures employed on our projects range from small scale measures to full reinstatement schemes and enable us to deliver our corporate and legal obligations on biodiversity. These include delivering site based environmental and sustainability good practices, mitigating risks to the natural environment, and reinstatement following works.

Measures for enhancing biodiversity value range from the small scale e.g. installing bird boxes to full landscape schemes with planting, habitat creation and long-term management plans extending out decades. Where mitigation is not practical on site, we look to work with carefully selected partners to develop and agree appropriate ways to offset our impacts and seek opportunities for enhancement in the surrounding area or region.

Aligned objective
NRAP Objective 2: Safeguard species and habitats of principal importance and improve their management

Aligned objective
NRAP Objective 3: Increase the resilience of our natural environment by restoring degraded habitats and habitat creation

Case study: Pipeline maintenance on sensitive moorland habitats

As we build and maintain our gas assets across Wales, it is essential that our projects seek ways to reduce the fragmentation of our habitats and species, prevent permanent habitat loss, and ensure that we can deliver positive enhancements.

Matting to provide substrate for moorland habitat regrowth

In response to findings from a pipeline inspection on one of our major pipelines in Wales, seven locations were identified as having significant defects that required excavation, inspection, and remediation.

Work was undertaken between April and July 2025 within a designated SSSI situated on Common Land. This project incorporated biodiversity considerations into planning, decision-making, operational delivery, and post-works restoration.

Integration of biodiversity into project planning

- SSSI Assent was secured from Natural Resources Wales (NRW) following ecological assessment.
- Consent from Planning and Environment Decisions Wales (PEDW) was obtained for work on Common Land.
- Peatland and nesting birds were identified as primary risks requiring targeted mitigation.
- Environmental reports and nesting bird surveys were completed ahead of mobilisation.

Preventing Disturbance to Protected Species

- Works occurred during the sensitive nesting period. In order to minimise ground disturbance and reduce risk to breeding birds, the majority of machinery, materials, and equipment were transported to site by helicopter, significantly limiting habitat disruption and noise footprint.
- We had a central compound (outside of the SSSI) where all plant and equipment were stored. All helicopter lifts took place from this compound to the excavation areas, strictly following route plans designed to avoid sensitive nesting sites.
- The project team used dedicated ecological mapping to identify and avoid breeding bird zones, ensuring all aerial access routes and foot movements minimised disturbance.

Protecting Priority Habitats

- All excavation sites were located within peat bog, a Section 7 priority habitat.
- Excavations were supported using low-impact methods such as battered sides, sheet piles, frames, or hydraulic trench boxes.
- Peat turves and subsoils were removed and stored separately, enabling later reinstatement with maximum retention of soil structure and hydrological function.

- Strict controls were implemented to prevent erosion, sediment displacement, and hydrological disruption.
- The seven locations were all extremely remote, situated in deep and fragile bog terrain.

- Helicopter access was used extensively to prevent surface damage, reduce rutting, and protect the SSSI peatland from long-term disturbance.
- Environmental safeguards remained in place throughout the project window.

Helicopter lifts mitigated many of the potential environmental risks

Reinstatement and Ecosystem Recovery

After the pipeline repairs were completed, excavations were backfilled using original sub-soils and topped with stored peat turves. Reinstatement aimed to:

- Retain peat profiles,
- Stabilise surface vegetation,
- Support hydrological continuity, and
- Promote long-term carbon retention and biodiversity restoration.

Dialogue with NRW continues to enable further remediation and monitoring to secure sustained habitat recovery. Further site visits and habitat improvement works are expected to continue into Spring 2026, allowing adequate seasonal conditions for successful vegetation establishment.

National Gas sought recommendations for appropriate local species of heather, grasses and other moorland plants to ensure reinstatement supports ecosystem resilience and aligns with NRW expectations. A specialist contractor was engaged to undertake these additional restoration works.

Partnership working was central; specialist ecologists undertook surveys, supported SSSI Assent preparation, and oversaw ecological compliance on site.

Engagement with moorland habitat contractors is ongoing to deliver specialist peatland reinstatement and ensure long-term ecological quality and resilience.

The project represented an investment of approximately £1 million across the seven excavation locations, reflecting a significant commitment to safe asset management while protecting designated habitats.

Outcomes for Biodiversity and Ecosystem Resilience

The project contributed positively to biodiversity and ecosystem resilience by:

- Minimising ground disturbance during the breeding bird season.
- Preserving the structure and function of peatland habitats.
- Using helicopter delivery and collection for equipment and materials to avoid tracking across land.
- Reducing carbon loss risks through careful peat handling and reinstatement.
- Collaborating with ecological specialists to inform best practice.
- Embedding long-term habitat recovery into post-project commitments.
- Incorporating additional habitat improvements such as native moorland reseeding to support long-term ecological enhancement and potential net gain.

Case Study: Working with The Wildlife Trust of South and West Wales to enhance habitats at Taf Fechan woodland

We identified that a section of our pipeline at Taf Fechan require an upgrade to the nitrogen sleeve used to provide corrosion protection.

The works required excavation of the pipeline for repairs, with a site compound and laydown area established at the Taf Fechan woodland car park. The woodland is managed by The Wildlife Trust of South and West Wales requiring careful coordination to ensure minimal ecological impact and opportunities for biodiversity enhancement.

This project integrated biodiversity considerations at all stages of planning, execution, and post-work habitat improvements.

Ecological planning and permissions

- An ecology survey of the impacted area was undertaken to assess habitats and species prior to works.
- Assent was obtained from NRW for works to take place within the SSSI.
- Coordination with The Wildlife Trust of South and West Wales ensured that works aligned with local conservation objectives.

Mitigation measures during works

- Designations in the area of the works included SSSI, Local Nature Reserve (LNR), Site of Importance for Nature Conservation (SINC) and Wildlife Trust Reserve (WTR). This required appropriate mitigation and sensitive working practices to preserve the ecological interest features of these overlapping designations
- All liquid containers and plant equipment (excavator, compressor) were placed on drip trays to prevent contamination, and a refuelling procedure was provided to NRW.
- Retained hawthorn trees were fenced off to prevent accidental damage.
- Boulder and debris handling included prior checks for species; for example, a common toad was discovered during clearance and safely relocated.

Minimising habitat disturbance

- The layout of the compound and excavation access routes were designed to avoid sensitive habitats within the woodland.
- Works were carefully scheduled to reduce disturbance to wildlife, particularly during sensitive periods.

Forest habitat at Taf Fechan woodland

Biodiversity enhancement measures

As part of a proactive approach to enhancing local biodiversity, the project delivered the following improvements in collaboration with The Wildlife Trust of South and West Wales:

- A tawny owl nesting box was installed in an optimal location within Taf Fechan woodland to support breeding activity. The site selection and installation were agreed with the landowner to ensure safe and minimal disturbance access.
- Five bat boxes were installed on mature trees to provide flexible roosting options for multiple bat species, including pipistrelles, noctules, Brown long-eared and Natterer's bats.

Monitoring and compliance

- Environmental oversight was provided during the site visit by a National Gas environmental specialist.
- Photos were taken to record compliance with mitigation measures, including drip tray use, fencing, and species relocation.

Outcomes for biodiversity and ecosystem resilience

The Taf Fechan nitrogen sleeve project contributed positively to biodiversity and ecosystem resilience by:

- Minimising disturbance to woodland habitats and resident species during construction.
- Protecting existing trees and soil resources from operational impacts.
- Enhancing local biodiversity through the installation of a tawny owl box and bat boxes.
- Collaborating with ecological specialists and the local wildlife trust to deliver targeted ecological improvements.
- Supporting species resilience and ecosystem functionality within Taf Fechan woodland.

These measures represent a positive contribution to the maintenance and enhancement of biodiversity, embedding ecological best practice within operational activities.

Brown long-eared bat (*Plecotus auritus*)

5. Management of key pressures

Invasive species and injurious weeds

As part of our approach to land and estate management, each of our sites are inspected at least annually by our real estate service provider. This inspection process includes the identification of invasive species or injurious weeds, in addition to other issues such as pollution and fly tipping which may have the potential to impact habitats and biodiversity. Once identified, we keep a register of all sites where invasive species are present and initiate a monitoring and treatment program using our specialist contractors to control and manage the area. During project delivery our contractors take on the management of these issues within the designated construction compounds and areas; particular care is taken when we stockpile soils for subsequent reinstatement as disturbed ground can promote weed growth.

Waste and resources

As part of our EAP, our principal goal is to produce minimal waste across our whole value chain and to align our business to circular economy principles. This work will reduce the burden of waste on the natural environment and minimise resource extraction.

Nature based solutions

Where appropriate we use natural solutions to manage impacts associated with our construction activities and the ongoing operations at our sites, in particular our compressor stations and above ground installations. These can include use of soil berms, tree and vegetation planting to provide visual screening and noise mitigation, and sustainable drainage schemes (SuDS) to manage run-off and flood risks at our sites.

Our supplier Code of Conduct

We have a supplier Code of Conduct which sets out our expectations, values, and fundamental principles which we expect our suppliers to extend into their business and their own supply chain. We expect our suppliers to make an active contribution to environmental sustainability, including compliance with legal standards, pollution prevention, and climate change mitigation.

Working with our supply chain

We also work with our supply chain to ensure that the wider impacts of the products and services we buy are understood and managed effectively, including potential impacts to deforestation and habitat loss.

Aligned objective
NRAP Objective 4: Tackle key pressures on species and habitats

6. Gathering and sharing our environmental data

A core element of our sustainability strategy focusses on gathering a better understanding of the natural assets we own, and the benefits and services the these provide to our business and wider beneficiaries.

To inform the development of our larger infrastructure schemes, we gather a multitude of environmental and ecological data. For Welsh projects, we will typically engage with stakeholders including the Local Planning Authorities, National Park Authorities and NRW.

Through this process we will agree on the nature and scope of site surveys and assessments we undertake, which will allow the project to progress and to minimise residual effects.

In support of planning or Environmental Permit applications, we often undertake a series of environmental studies and assessments which can include:

- Ecology surveys, looking at general habitats and specific species including bats, badgers, great crested newts, invertebrates, birds and reptiles.
- Arboricultural studies to look at trees and design appropriate measures to protect trees that are being retained.
- Landscape assessments, which will take in account key viewpoints from which our development can be seen by the local community.

Throughout the development and delivery of our projects National Gas continues to engage with relevant stakeholders, often sharing data, discussing findings and seek their knowledge and expertise through meetings and communications.

Data collected in these surveys and their outcomes is nearly always publicly available, unless there are any specific security concerns related to the information as many of our assets are classed as Critical National Infrastructure.

Information can be found via local planning portals or public registers and we invite comment and participation from the public and statutory bodies informally and through the provisions in place under environmental and planning legislation.

Aligned objective
NRAP Objective 5: Improve our evidence, understanding and monitoring

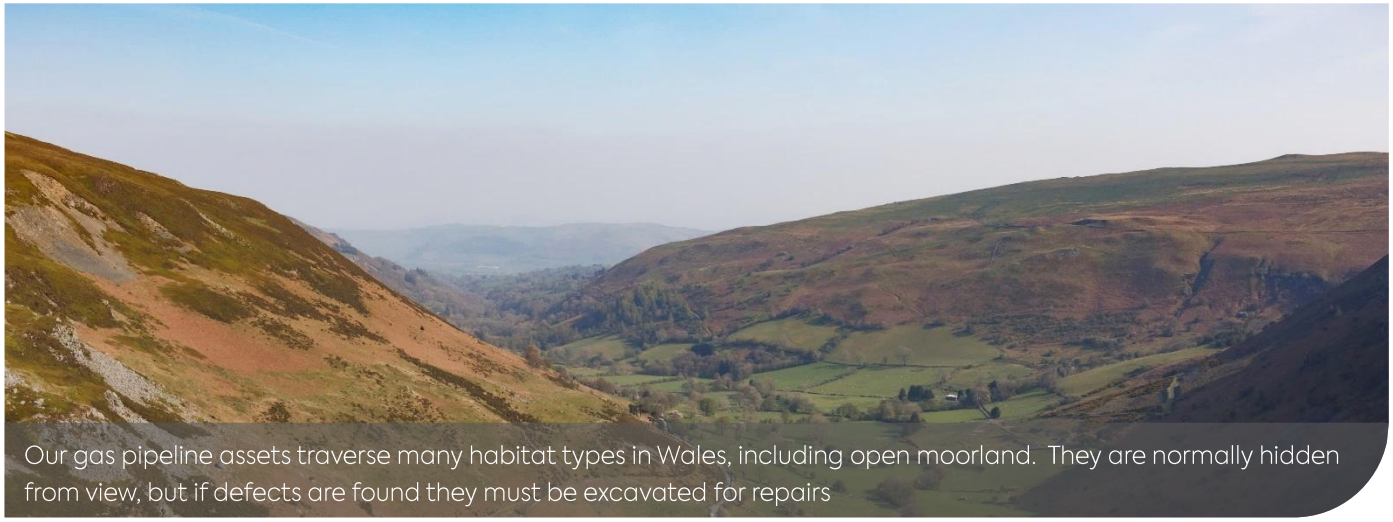
7. Review of s6 duty

Progress against our corporate targets relating to all elements of our responsible business strategy including carbon, climate change, net zero, resources and the natural environment (including biodiversity and our section 6 duty) are measured and reported externally as part of our existing corporate reporting processes, including in our Annual Environmental Report.

Sections 2, 3 and 4 of this report have described the governance framework that we have established to discharge our legal and corporate responsibilities and commitments. We have outlined how these obligations are put into practice on our delivery projects through two recent case studies detailing work we have conducted in Wales in the last year.

Every three years the Environmental & Sustainability Team will support the UK business to gather information and case studies which will be included within an updated version of this report.

Aligned objective
NRAP Objective 6: Put in place a framework of governance and support for delivery



Our gas pipeline assets traverse many habitat types in Wales, including open moorland. They are normally hidden from view, but if defects are found they must be excavated for repairs

8. Further information and glossary

Through this document we have referred to other National Gas documents, and other external sources of further information on this topic.

Further information

Our homepage
https://www.nationalgas.com/

Our Environment and Sustainability Policy
https://www.nationalgas.com/sites/default/files/documents/gtm-environment-sustainability-policy-2024.pdf

Our most recent annual environmental report
https://www.nationalgas.com/sites/default/files/documents/AER%20-%20National%20Gas%20-%202024_25.pdf

Our Environmental Action Plan (EAP) and Five-year Targets
https://www.nationalgas.com/sites/default/files/documents/Environmental%20Action%20Plan%20Brochure.pdf

Our role in the future of energy
https://www.nationalgas.com/future-energy

Wales Biodiversity Partnership
https://www.biodiversitywales.org.uk/en/

Welsh Government Section 6 biodiversity and resilience of ecosystems duty: summary report 2022
https://www.gov.wales/section-6-biodiversity-and-resilience-ecosystems-duty-summary-report-2022-html

Welsh Government Nature Recovery Action Plan (NRAP)
https://www.gov.wales/nature-recovery-action-plan

Glossary

EAP. Our Environmental Action Plan, which publishes our five environmental and sustainability pillars and 30 underlying commitments.
FEA. Formal Environmental Assessment, our in-house process to drive the correct, repeatable and auditable application of environmental and sustainability activities during project design and delivery.
BNG. Biodiversity Net Gain, an approach to development, and/or land management, that aims to leave the natural environment in a measurably better state than it was beforehand.
ISO14001:2015. This is the internationally recognised standard for environmental management systems (EMS). It provides a framework for organisations to design and implement an EMS, and continually improve their environmental performance.
Methane. This is a powerful greenhouse gas, up to 28 times more potent than carbon dioxide, and known to contribute to anthropogenic climate change. Methane is the primary constituent of natural gas.
NBB. Net Benefit for Biodiversity, the biodiversity gain regime in Wales
NRAP. The Welsh Government's Nature Recovery Action Plan
NRW. Natural Resources Wales
NTS. The gas National Transmission System, which is owned and operated by National Gas Transmission plc.
Ofgem. The energy regulator for Great Britain. We work to protect energy consumers, especially vulnerable people, by ensuring they are treated fairly and benefit from a cleaner, greener environment.
RIIO. RIIO stands for Revenues = Incentives + Innovation + Outputs. The price control framework for high pressure gas transmission networks which lasts for five years. RIIO-T1 ran from 2013-2021. RIIO-T2 started on 1 April 2021 and runs until 31 March 2026. RIIO-GT3 starts on 1 April 2026 and runs until 31 March 2031.

national gas transmission

National Gas Transmission
National Grid House
Warwick Technology Park
Gallows Hill
Warwick, CV34 6DA

Tel: +44 (0) 1926 65 3000

nationalgas.com