GREEN GEN CYMRU

Biodiversity Duty Monitoring Report to Welsh Government

February 2026

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1.0 Introduction

1.1 Background

1.1.1 Green Generation Energy Networks Cymru ('Green GEN Cymru', or 'GGC') (together with all other public authorities in Wales) has been given increased responsibilities and legal duties to maintain and enhance the natural environment and biodiversity as a result of the Environment (Wales) Act 2016 ('the **2016 Act**'), specifically Part 1 Section 6 'Biodiversity and Resilience of Ecosystems Duty' ('the **Section 6 Duty**'), which requires that:

"A public authority must seek to maintain and enhance biodiversity in the exercise of functions in relation to Wales, and in so doing promote the resilience of ecosystems, so far as consistent with the proper exercise of those functions"

1.1.2 Section 6(6) of the 2016 Act GGC requires public authorities to prepare and publish a plan setting out what they intend to do to comply with the Section 6 Duty.

1.1.3 The 2016 Act also requires public authorities to report on what they have done to comply with the Section 6 Duty. Section 6(7) sets out that reports must be submitted to the Welsh Government at three-yearly cycles. This report is GGC's first Biodiversity Duty Monitoring Report. It provides an overview of the key initiatives that we have undertaken to date and describes the status of the actions from the Biodiversity Duty Plan 2026-2029 along with recommendations for further action.

1.1.4 It is worth noting that Section 6(8) of the 2016 Act requires public authorities to review their published plan in the light of each report it publishes, and amendments can be made to the plan as a result.

1.1.5 GGC was granted an IDNO licence, and so became subject to the Section 6 Duty, on 5 July 2024. The Welsh Government's 'Guidance for Section 6 – The Biodiversity and Resilience of Ecosystems Duty Frequently Asked Questions'[1] (the **'FAQ Guidance'**) document in response to the question "When should the S6 plan be produced?" advises public authorities *"if the S6 plan has not been prepared in the first year after Part 1 of the [Environment] Act coming into force, it should be prepared as soon as possible."* It goes on to advise *"it would be reasonable for a public authority to align its planning and reporting for the S6 duty with their corporate planning cycles, particularly where this can demonstrate the embedding of the S6 Duty"*.

1.1.6 GGC has therefore decided to publish our Section 6 Plan ('Biodiversity Duty Plan 2026-2029') and Report (this document) at the same time. Doing so enables GGC to consider how our activities prior to the publication of the Section 6 Plan have contributed to meeting the Section 6 Duty and in order to provide an accurate 'baseline' from which we can review our progress.

1.1.7 As explained in our Biodiversity Duty Plan 2026-2029, the actions are framed within the context of the Nature Recovery Action Plan (NRAP) Aims, as well as being embedded within broader contexts, such as the Wellbeing of Future Generations (Wales) Act 2015, and being cognisant of relevant policies such as the State of Natural Resources Report (SoNaRR) for Wales and the Area Statements produced by Natural Resources Wales (NRW).

1.2 Green GEN Cymru in 2026

1.2.1 GGC is a business in the Windward Energy Group whose aim is to promote and develop new grid infrastructure to distribute green energy in Wales. Guided by our

[1] https://www.gov.wales/sites/default/files/publications/2019-05/environment-wales-act-2016-biodiversity-resilience-ecosystems-frequently-asked-questions.pdf

purpose, “Positive Energy for a Positive Future”, GGC is committed to building a resilient renewable energy network to help deliver clean, reliable energy to communities and businesses across Wales. This commitment supports the Welsh Government’s ambition to achieve 100% renewable electricity by 2035[2].

1.2.2 GGC intends to develop, own and operate a 132kV independent distribution network to connect Welsh renewable energy generation to the existing grid network, and has been granted an Independent Distribution Network Operators (IDNO) licence to undertake our proposed projects.

1.2.3 Currently, GGC is solely in the planning and consenting phase of our projects. We do not have any projects that are under construction or operation. GGC’s current activities are principally limited to desk-based works, non-intrusive site surveys and a limited quantity of ground investigation surveys. At the time of writing, GGC does not own any land or any interests in land associated with our proposed distribution network, nor do we have any built infrastructure but we will seek over the plan period to determine and then acquire the interests in land that are required to deliver and operate our infrastructure assets.

1.3 Green GEN Cymru’s Policies and Procedures

1.3.1 Decision-making at all levels and all stages of a grid connection project (from planning and consenting to construction to operation and maintenance) can contribute to protecting and enhancing biodiversity and improving ecosystem resilience. Environmental considerations, including biodiversity, are a key factor throughout GGC’s grid connection projects, alongside technical feasibility and economic viability factors.

Planning and Consenting Phase

1.3.2 The construction and operation of a grid connection has potential to result in adverse effects on people and the environment, including on biodiversity. Some effects can be avoided or minimised through careful routeing, while others are best mitigated through local deviations of the route, the refining of infrastructure locations and/or specific construction practices. Any potential effects will be identified and assessed, for example during the Environmental Impact Assessment (EIA) process (where required, in line with The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017[3] (the ‘**EIA Regulations**’), as part of the planning application, and opportunities for enhancement will be identified.

1.3.3 It is generally accepted across the electricity industry that the guidelines known as 'The Holford Rules'[4] should be employed as the basis for routeing high voltage overhead lines. These rules include the avoidance of major areas of highest amenity value when planning the general route (Rule 1) and the avoidance of smaller areas of high amenity value or scientific interest by deviation of the route (Rule 2).

1.3.4 GGC’s ‘Approach to Routeing Grid Infrastructure in Wales'[5] document, which is informed by the Holford Rules, outlines the process for identifying and appraising route options, as well as assessing environmental effects. It is designed to establish

[2] https://www.gov.wales/wales-aims-meet-100-its-electricity-needs-renewable-sources-2035
[3] https://www.legislation.gov.uk/wsi/2017/567/contents
[4] https://www.nationalgrid.com/sites/default/files/documents/13795-The%20Holford%20Rules.pdf
[5] https://greengentowyusk.com/documents/Approach%20to%20routeing%20Grid%20infrastructure%20in%20Wales.pdf

a consistent methodology for the routeing and Environmental Impact Assessments of all GGC's grid connection projects.

Route selection process

1.3.5 Route selection is a sequential and iterative process, taking into account environmental, technical, and other considerations at each step. The key steps of GGC's approach are illustrated in **Figure 1**.

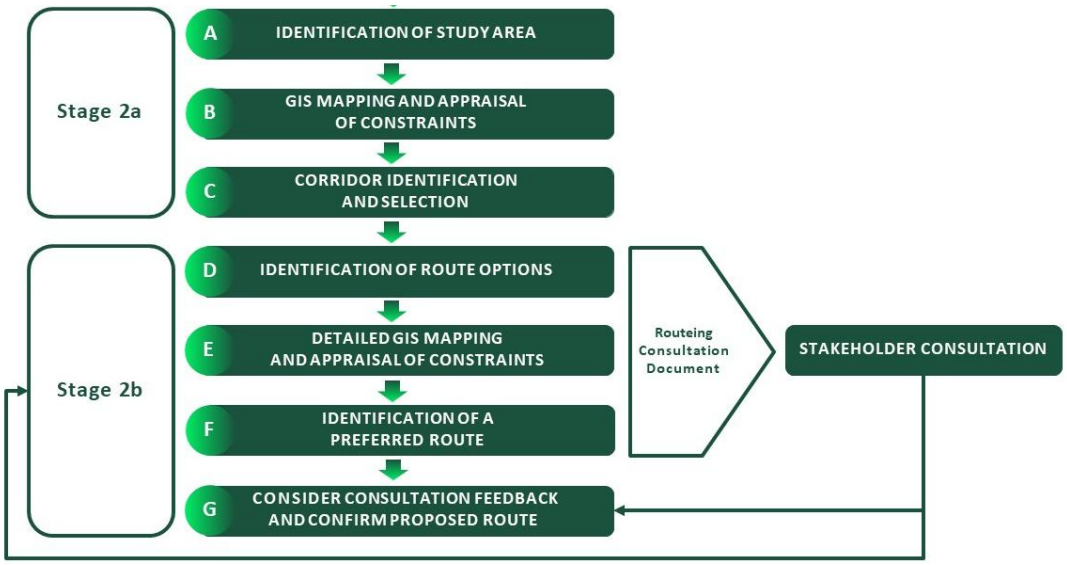

Figure 1: Green GEN Cymru's Route Selection Process

1.3.6 During the route selection process, environmental and technical constraints derived from desk-based studies and on-site surveys are mapped and appraised to first select a suitable corridor (Stage 2a), within which all likely grid connection route options could be accommodated, and then a preferred route within that corridor (Stage 2b). The analysis of environmental and technical data becomes more detailed throughout the process and the Holford Rules are applied as appropriate. Once the preferred route has been confirmed, indicative locations for infrastructure are identified, with regard given to technical and environmental constraints.

Consultation and environmental assessment

1.3.7 Consultation on the preferred route is undertaken with stakeholders, including statutory bodies, landowners and the community, with the preferred route refined further to take account of feedback. For projects that are determined to constitute EIA Development, this review process is intended to be iterative and will be further informed by the EIA Scoping process, undertaken in parallel with Stage 2b of the route selection process, to ensure the selection of a preferred route is sufficiently robust.

1.3.8 Work on the detailed design will then progress in parallel with the EIA. Further public consultation on the detailed draft route alignment options will also take place during the EIA process.

Embedded (Primary) Mitigation

1.3.9 As part of the route appraisal process and subsequent more detailed environmental assessment, the scope to mitigate potential impacts through design (embedded, or 'primary' mitigation) is considered at a level of detail proportionate to the stage of appraisal or assessment. Embedded mitigation measures considered at the routeing stage principally relate to the preferred draft route alignment option and the

placement of infrastructure. For example, infrastructure can be placed closer together or further apart to avoid any direct, physical interaction with an environmental receptor, or to allow an overhead line to oversail environmental features.

Additional (Secondary and Tertiary) Mitigation

1.3.10 Where likely significant adverse effects on the environment are identified through the EIA process, after embedded mitigation has been taken into account, further measures (additional, or 'secondary' mitigation) would be proposed to avoid, prevent or reduce and, if possible, offset the effects. Examples of secondary mitigation include additional detailed design, for example to comply with proposed noise limits. In accordance with the EIA Regulations, monitoring would be proposed (where appropriate) where significant adverse residual effects remain.

1.3.11 Tertiary mitigation comprises measures that will be required regardless of any EIA, as they are imposed, for example, as a result of legislative requirements and/or standard sectoral practices. Examples of tertiary mitigation include considerate contractor's practices that manage activities which have potential nuisance effect (i.e. through the implementation of a Construction Environmental Management Plan).

Biodiversity Enhancement

1.3.12 A mandatory Net Benefit for Biodiversity is required for all development in Wales, reinforced through the Environment Act and national planning policy. There is no mandatory percentage of net benefit that must be met in Wales (unlike England's 10% Biodiversity Net Gain requirement); rather, the focus is on qualitative improvements and proportionate, demonstrable gains.

Construction and Operational Phases

1.3.13 GGC is solely in the Planning and Consenting Phase of our projects. Site specific detailed Construction Environmental Management Plans (CEMPs), Operational Environmental Management Plans (OEMPs), and Habitat Management and Monitoring Plans (HMMPs) will be developed following industry best practice in due course and will include measures for the protection and enhancement of biodiversity.

Case Study: Towy Teifi grid connection routeing

For the above project, as with all GGC projects, identifying a corridor within which to locate a 132kV overhead line focused on avoiding environmental receptors, specifically areas of conservation value for landscape, heritage and biodiversity functions, as well as avoiding people and local communities. By ensuring the exercise was environment-led from the earliest stages, positive outcomes were achieved in that the mitigation hierarchy could be followed and the majority of sensitive receptors could be avoided whilst minimising the effects on views and local amenity value for local people.

In a small number of locations, where receptors could not be avoided, environmental concerns were front-loaded in the engineering design. This resulted in the proposed partial undergrounding of the project to avoid impacting a scheduled monument of significant local amenity value as well as heritage value (Merlin's Hill Scheduled Monument), and to minimise potential impacts to the Afon Teifi Special Area of Conservation (SAC). Furthermore, the proposed construction swathe boundary has been reduced at specific locations where temporary works could damage ancient woodland and associated forest floor habitats.

The long-term efficiency of being environmentally led, as opposed to engineering led, has meant the mitigation hierarchy could be followed, with avoidance prioritised in the design.

2. Reporting on Actions

2.0.1 Guidance from the Welsh Government[6] suggests that reporting on actions be based on the Aims in the Nature Recovery Action Plan (NRAP) for Wales.

2.0.2 The NRAP is a strategic framework produced by the Wales Biodiversity Strategy Board (WBSB) in partnership with Welsh Government with the ambition *"To reverse the decline in biodiversity, for its intrinsic value, and to ensure lasting benefits to society"*, which would be achieved through the aims set out in **Table 2**.

[6] https://www.gov.wales/sites/default/files/publications/2025-10/environment-act-2016-part-1-section-6-the-biodiversity-and-resilience-of-ecosystems-duty-reporting-guidance.pdf

Table 1: Nature Recovery Action Plan Aims

Aim	Description
Aim 1	Protect, restore and effectively manage ecosystems to build their resilience
Aim 2	Safeguard species and improve their management
Aim 3	Tackle key pressures on species, habitats and ecosystems
Aim 4	Establish effective governance and capacity to deliver
Aim 5	Embed biodiversity through engagement and awareness raising to support effective decision making at every level
Aim 6	Improve our evidence and monitoring

2.0.3 **Table 2** reports on the initiatives that GGC has carried out to date against each action form the Biodiversity Duty Plan 2026-2029 with regard to maintaining and enhancing biodiversity and promoting the resilience of ecosystems. They are grouped under the six NRAP Aims in accordance with Welsh Government guidance.

Table 2: Biodiversity Duty Action Status Update

Action no.	NRAP Aims	Actions	Lead team(s)	Support team(s)	Status	Context / reported actions to date	Recommendations
1	Protect, restore and effectively manage ecosystems to build their resilience	Make documents available to relevant staff via the policies and procedures hub on GGC's intranet detailing how the mitigation hierarchy (also 'Step-wise Approach') can be applied to project design and routeing: avoid nature impacts (including connectivity), then minimise, then mitigate or restore, and finally offset or compensate for any residual effects to deliver a net benefit for biodiversity. [Planning Policy Wales, v12]	Engineering / HSE		Ongoing	Mitigation hierarchy is embedded into GGC's step-wise process. Intranet policies and procedures hub is already accessible by all employees and is in the process of being updated to include relevant biodiversity information.	In future reporting cycles, a playbook can be created to show how the mitigation hierarchy is applied. This can cross reference S6 obligations and S7 habitat lists where necessary.
2		During the early stages, for each project and with reference to the appropriate Area Statement, plan for how the construction and operational phases will be carried out such that they contribute to protecting and restoring nature.	Engineering / HSE		Ongoing	We are currently in the early stages of our projects. This includes conducting environmental surveys across the routes. These surveys will inform the Environmental Impact Assessment, which assesses environmental effects during the construction, operational and decommissioning phases of development.	None
3		Consult and liaise with ecologists, local experts and communities at the at the appropriate stages during scheme development to support nature protection and enhancement at project planning, construction and operational stages, and to contribute to nature-based solutions in the design, particularly with reference to Section 7 habitat lists.	Engineering / HSE		Ongoing	Each project is undergoing a number of public consultations, both statutory and non-statutory, appropriate to its planning stage. GGC is responding to feedback and altering routes where possible and appropriate to address feedback. Also, ecological surveys are being carried out where access has been granted.	Make ecosystem enhancement more prominent as an option for discussion throughout all stages of consultation, to assess whether GGC development can support local ecological enhancement needs and desires, either as an integral part of the construction or management of the network, or as a reasonable extra piece of work during construction or operation.
4		Explore options for integrating habitat creation into project design to create a focus on biological enhancement during and post project implementation including improving diversity of ecosystems and connections between and within ecosystems	Environmental management		Not started	Projects are at early stages. When routes have been confirmed, options will be explored for suitable biological enhancement either on site or adjacent to the route where possible, or in other strategic places to bring about the most ecological value.	Review habitat networks from DataMapWales (NRW resource) to determine where habitat creation can bring the most ecological value. Assess the feasibility of habitat enhancement and providing greater connectivity, especially on undergrounded sections, or supporting habitat creation in areas adjacent to distribution routes, in consultation with local communities and landowners.
5		Planning policy requires development to deliver a net benefit for biodiversity and ecosystem resilience from the baseline state (proportionate to the scale and nature of the development proposed) [PPW]. This will be considered at an appropriately early stage of project	Environmental management		Ongoing	A portfolio-wide guidance note on GGC's proposed approach to NBB has been drafted. This will inform initial discussions with key stakeholders at the appropriate time.	None

Action no.	NRAP Aims	Actions	Lead team(s)	Support team(s)	Status	Context / reported actions to date	Recommendations
		planning and routeing and will inform the planning and delivery of the construction and operational phases.					
6		Identify and engage with relevant stakeholders to explore the feasibility of working with local authorities to deliver biodiversity and NBB related co-benefits on non-GGC owned land.	Project management	External Comms	Not started	A portfolio-wide guidance note on GGC's proposed approach to NBB has been drafted. This will inform initial discussions with key stakeholders at the appropriate time.	None
7		Maintain a record of projects that GGC has contributed to that contribute to 'nature positive' goals as per the Global Biodiversity Framework, acknowledging that even at operational stage GGC will have control over very little land.	Project management	All	Not started	All projects are currently at various stages of planning. None of the projects are at construction stage, so that no land is currently within GGC control.	None
8		Keep an incident log for each project to ensure that lessons learned are recorded, and successful projects are flagged as case studies.	Project management		Ongoing	Due to the early stages of the projects, there are no incidents or successful projects to report as yet. However, these will be recorded if and when they happen.	None
9		Suitably manage potential sources of nuisance (e.g. light, noise, dust) and pollution (especially run-off into watercourses), and the spread of Invasive Non-Native Species (INNS) through implementation of best practice measures and relevant management plans during the construction phase of projects to avoid/minimise potential impacts on sensitive receptors.	HSE Dept	Engineering	Not started	All projects are currently at various stages of planning. None of the projects are at construction stage.	Construction Phase Health and Safety Plans will be required from all contractors and will be reviewed prior to execution
10		Suitably manage potential sources of nuisance (e.g. light, noise, dust) and pollution during the operational phase of projects, such as water runoff from substations/switching stations	HSE Dept	Engineering	Not started	All projects are currently at various stages of planning. None of the projects are in operation.	Health and Safety Plan will be in place when the assets become operational to cover ongoing needs throughout the lifetime of the asset.
11		Identify potential impacts in the supply chain, and seek to apply the mitigation hierarchy to biodiversity impacts as much as possible within GGC's level of influence	Supply chain engagement		Ongoing	GGC recognises that biodiversity impacts may arise not only from on-site activities but also within its supply chain, including the sourcing, manufacture and transport of materials and equipment. Potential impacts include habitat loss or degradation associated with raw material extraction (e.g. aggregates, timber, metals), pollution from manufacturing processes, and indirect effects linked to transport and logistics. GGC will seek to manage these risks by applying the mitigation hierarchy, proportionate to its level of influence over suppliers:	Carry out a high-level assessment of major supply chains to evaluate risks to biodiversity where possible. It is likely that key impacts will be in the steel and wood supply chain.
12	Safeguard species and	Referring particularly to Section 7 species lists, conduct environmental screening and comprehensive ecological assessments before and during the planning of projects	Environmental management	All	Ongoing	Ecological assessments are currently being carried out at the appropriate stages of each	None

Action no.	NRAP Aims	Actions	Lead team(s)	Support team(s)	Status	Context / reported actions to date	Recommendations
	improve their management					project's planning, where access to land is available.	
13		Provide/maintain suitable habitats for protected species where feasible within GGC's level of influence, acknowledging that even at operational stage, GGC has minimal influence over how the land is managed as it will operate largely on easements.	Environmental management	Engineering / HSE	Not started	No projects currently at construction phase, but this can be considered during detailed planning. However, since even at operational stage GGC will own or have control over only very small parcels of land (operating mostly on easements), the level of provision possible will necessarily be limited.	None
14		Where possible, plan routes that protect species, and safeguard and enhance their habitats	Environmental management	Engineering / HSE	Ongoing	The 'Approach to Routeing Grid Infrastructure in Wales'[7] document lays out the approach in detail, including the approach to protecting species and safeguarding habitats	Ensure that the approach is followed, and document decisions made that contribute to protecting species and safeguarding habitats
15	Tackle key pressures on species, habitats and ecosystems	Develop and adopt an Invasive Non-Native Species (INNS) early detection/rapid response plan for all project sites	Environmental management	Engineering / HSE	Ongoing	This will be drafted, ready for implementation at construction and operational stages	None
16		Undertake a locational assessment of sites to understand where key pressures may be. This would involve investigating the site and an ‘area of influence’ for a reasonable distance beyond site boundaries, informed by expert ecological input, to understand and assess site-specific pressures on species, habitats and ecosystems and locationally appropriate measures to respond.	Environmental management	Engineering / HSE	Ongoing	This is part of conducting best practice ecological assessments	Align with guidance for first phase of TNFD LEAP approach. This can then lead to a full LEAP assessment or TNFD disclosures in future reporting cycles.
17		Integrate a 'nature-based solutions by default' ideology into project planning and management processes. This can include leveraging things such as SuDS, swales/wetlands, native trees/grasslands as much as possible instead of grey infrastructure.	Environmental management	Engineering / HSE	Not started	To be considered during planning. However, since even at operational stage GGC will own or have control over only very small parcels of land (operating mostly on easements), the level of provision possible will necessarily be limited although some opportunities may merit further exploration (e.g. SuDS for substations where necessary and appropriate)	These nature-based solutions (NbS) are unlikely to be possible on most GGC overhead distribution routes. However, consideration should be given to them on the undergrounded sections, and it may be appropriate to support provision of NbSs of benefit to local communities on land adjacent to the distribution route, making use of available machinery during construction phases to support creation of local community NbSs.
18		Where tree planting is required for mitigation/enhancement purposes, engage with landowners and statutory consultees and, where achievable, seek to adhere to the 'right tree, right place' principle	Environmental management	Engineering / HSE	Not started	Projects are not yet at that stage. However, when tree planting is required, we will consult with relevant experts, authorities and landowners to ensure a strategic approach to planting he right trees in the right place to ensure suitable habitat enhancement.	With reference to the Holford Rules and recognising the value of trees for either screening or as backdrop, consider supporting tree-planting near distribution routes, in consultation with local communities and ecologists to ensure adherence

[7] https://greengentowyusk.com/documents/Approach%20to%20routeing%20Grid%20infrastructure%20in%20Wales.pdf

Action no.	NRAP Aims	Actions	Lead team(s)	Support team(s)	Status	Context / reported actions to date	Recommendations
							to the 'right tree, right place' principle.
19	Establish effective governance and capacity to deliver	Periodically review document folders on GGC intranet to determine where additional biodiversity information can be shared centrally for project teams to use during all phases of project design and implementation. Updates to be made if document management processes are changed during the reporting cycle.	Project management		Ongoing	Intranet policies and procedures hub is already accessible by all employees and is in the process of being updated to include relevant biodiversity information.	None
20		Having carried out the actions specified and required in the: Survey Access Protocol; Protected Sites and Species Policy; and Vulnerable Person Protocol, review decisions taken to ensure compliance	Executive Leadership Team		Ongoing	The GGC Board meet bi-monthly where matters relating to compliance are reviewed.	None
21		Establish a biodiversity champion on GGC's sustainability committee to take ownership of communicating information on biodiversity best practice, as well as any relevant nature risk/opportunity considerations to project teams as needed	Executive Leadership Team		Ongoing	Our Sustainability Committee meets monthly and we intend to discuss the topic of establishing a Biodiversity Champion at the next meeting - likely in February.	None
22		Provide company wide training on S6 obligations through webinars, lunch and learn sessions and business updates	Internal comms		Ongoing	2026 Programme of GGC Business Updates has been confirmed and diarised. As a business we host regular lunch and learn sessions internally or through an external partner or one of our appointed consultant team. Training on our Section 6 Obligations will form part of our programme of lunch and learn sessions during 2026. We will also be exploring further opportunities for appropriate training relating to our Section 6 obligations.	None
24		Identify potential nature-related topics for company wide upskilling, the teams which may benefit most from this, and the most effective way to provide this training (in-person, webinars, email/online materials)	Executive Leadership Team		Not started	See above	None
24		Update corporate risk register to include biodiversity as a risk identifier/tag. Risks tagged to biodiversity will be reviewed on a regular basis and escalated to relevant senior management as required.	Environmental management		Ongoing	Risk register is in the process of being reviewed and updated to tag nature and biodiversity specific risks to GGC.	None
25	Embed biodiversity through engagement and awareness raising to support effective decision making at every level	Create an engagement plan determining which stakeholders can be engaged on nature recovery opportunities, what these opportunities could be, and which communication channels are best in carrying out this engagement.	External comms / stakeholder engagement		Not started	Initial stakeholder list and engagement plan to be drafted by end Q2, 2026	None
26		Trial the introduction of biodiversity questions into supplier due diligence questionnaires with a trusted supplier to build out supply chain risk assessments related to nature	Supply chain engagement		Ongoing	PQQ for major construction works has imbedded ESG questionnaire that requests supplier to demonstrate their approach to environmental management	Consider aligning this exercise with TNFD LEAP approach by asking tier 1 suppliers for information on their nature impacts and dependencies and any hotspot locations
27		Review contract clauses and procurement processes to embed biodiversity expectations	Supply chain engagement		Ongoing	Supply Chain Code of Conduct under development inclusive of	None

Action no.	NRAP Aims	Actions	Lead team(s)	Support team(s)	Status	Context / reported actions to date	Recommendations
						biodiversity. Conduct will be linked to a clause within Deeds to confirm compliance	
28		Review existing corporate plans and policies to determine whether biodiversity is appropriately considered. Where gaps are noted, create an update plan showing how GGC intends to update policies over the current S6 reporting period to ensure appropriate considerations are reflected	Environmental management		Not started	Existing policies and plans to be reviewed by end Q2, 2026. Corporate Plans and Policies will then be updated over the next S6 reporting period, as detailed in the plan	None
29		Communicate nature positive achievements internally and externally to embed such practices into industry norms, and enhance reputation	Internal and external comms		Not started	No projects are yet at a stage to report nature-positive achievements	Add recording and reporting nature-positive achievements into project construction and operational monitoring and maintenance timelines, to ensure that they are embedded, and that photographs and data are collected at baseline and enhancements stages to provide a) materials for communication and b) data and evidence for when the Section 6 Plan is reviewed. Ensure a regular release of positive nature news as appropriate to maintain company reputation.
30		Draft job description for a permanent environmental manager role to be added to the team during the 2026-2029 action plan cycle	Executive Leadership Team		Ongoing	The environmental manager role is currently being filled via a consultancy partner. GGC is in the process of drafting a job description which is expected to be released to the public in Q3 of 2026	None
31		Draft 'need to know' biodiversity guidance for project managers and land teams.	Environmental management		Not started	Easy-to-use guidance documents designed for targeted relevance to these teams will be drafted by the end of Q2, 2026	In future reporting cycles, develop additional versions of this guidance targeting engineering, procurement, HSE and construction teams
32	Improve our evidence and monitoring	Establish monitoring for biodiversity outcomes and compliance and build these into HSEM audits and monthly reviews	HSE Dept	Nominated trained internal auditors	Not started	No projects are yet at a stage to report on biodiversity outcomes and compliance. However, these will be built in HSEM audits and monthly reviews	Add recording and reporting on biodiversity outcomes and compliance into HSE audits and monthly reviews, to ensure that they are embedded, and that photographs and data are collected at baseline and enhancements stages to provide a) materials for communication and b) data and evidence for when the Section 6 Plan is reviewed.