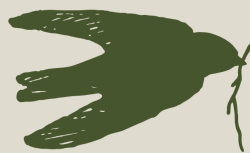


Nature on the Board

**Developing Principles for Nature
Representation in
Public Sector Governance:**

*The Nature Guardian Pilot in Comisiwn
Seilwaith Cenedlaethol Cymru/National
Infrastructure
Commission for Wales*

January 2026



Lawyers for Nature

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1. Executive Summary

This report positions Wales and the Comisiwn Seilwaith Cenedlaethol Cymru/National Infrastructure Commission for Wales (NICW) as a potential leader in broadening public-sector governance to incorporate the voice of Nature and future generations into decision-making.

Following the six-month pilot in which NICW appointed a Nature Guardian, this report was commissioned to examine the opportunities and challenges of representing Nature in governance and to identify a set of foundational principles, so that this pioneering approach can inform and inspire other public bodies seeking to recognise Nature as a stakeholder.

This report explores the cultural context, notably Wales' long-standing cultural connection to land and Nature. It considers the philosophical underpinning of Rights of Nature, international examples of Nature being given rights, and looks at examples of Nature being represented in decision-making spaces, like the board room. It examines the differences between statutory or legally embedded models and advisory approaches. It also critically reflects on the feasibility, risks and opportunities of Nature representation in public-sector governance. Finally, the report identifies some foundational principles and offers practical recommendations for other public bodies and organisations considering similar steps.



2. Introduction

2.1 The Commission's approach

There is a growing understanding that new approaches are needed in how we relate to, and govern our interactions with the natural world. The multiple tipping points and polycrises have demonstrated that traditional decision-making structures are no longer sufficient.

Against this backdrop, NICW has taken the groundbreaking step to embed the voice of Nature within its governance processes by appointing a Nature Guardian, Elspeth Jones, to the Commission as a six-month pilot project. When making the case for this the commissioners stated: *“Appointing Nature to a Board is a transformative act, one that acknowledges the simple truth: every decision we make, has an impact on the natural world. Yet for too long, Nature has been the absent stakeholder, affected by decisions but never truly represented.”*

At the early stages, when NICW was exploring the idea of bringing Nature into their decision-making spaces, they commissioned a thought piece that looked at how Nature might fit within NICW's structure. Our report will build on the foundational principles set out in [A Commissioner for Nature](#), by Simeon Rose at Faith in Nature, one of the leading voices in the Nature on the Board movement.



2.2 Aims & objectives

The aims and objectives of this report are as follows:

- a. To examine the challenges and complexities of representing Nature;
- b. To set this intervention within the broader cultural and legal landscape in Wales;
- c. To examine how Nature representation can be implemented in the public sector;
- d. To propose a set of foundational principles and practical recommendations that other public organisations might want to consider and;
- e. To contribute to the broader discourse on Nature representation in governance and decision making.

3. Wales & the Cultural Context for Nature Representation

3.1 Cultural & legal foundations

There is a strong historical and cultural foundation in Wales for the idea of listening to Nature and embedding Nature into decision-making spaces. *Nature in Wales' Cultural Heritage*, the essay written by Eurig Salisbury, outlines examples from myth, language, literature and religion that show Wales is a particularly well-placed country to experiment with this model.

Quoting Guto'r Glyn, a Welsh poet from the fifteenth century, the description of Nature is *"in the middle between the treacherous lowland marshes and the rough winds of the highlands, between the winter meadows and the summer heath, between hendre and hafod"*, which depicts *"the deep familiarity of the Welsh with their natural environment"*.





BG REACH, a research project using creative arts methods to consider what heritage and local identity mean to the residents of the Ebbw Fach Valley in Blaenau Gwent (a post-industrial community in South Wales Valleys), found that, contrary to expectations, many people did not primarily define their shared identity in terms of industrial heritage (such as coal-mining, steel works, etc). In fact, many drew connections with a pre-industrial landscape, rural heritage and older histories. Many also saw de-industrialisation as a kind of *“healing for the landscape”*, an opportunity for *“regeneration and renewal”* and a chance of reconnection with their history and natural heritage. It further highlighted the importance of the *“concept of landscape as a cultural concept”* for Welsh identity.

Wales was the first UK Nation to pass the Well-being of Future Generations (Wales) Act 2015, (WFGA), which requires specified public bodies to plan and act in the interests of people not yet born and take a long-term, preventative, integrated approach to policy for future generations.

In ‘Lessons from a Small Country’, Jane Davidson explains that whilst Wales may be the poorest country in the U.K., they are *“innovators; ... the world’s first fairtrade nation, a world leader in recycling, a U.K. leader in organ donation, one of the only countries in the world where you can ‘walk the shape of the nation’ along our coast and of course the first country in the world to legislate for future generations.”*

Wales has also established a statutory duty to protect biodiversity and ecosystem resilience. The Environment (Wales) Act 2016, Section 6, places a duty on public authorities to seek to maintain and enhance biodiversity and promote ecosystem resilience when carrying out their functions. The Act references the need to raise awareness of *‘a biodiverse natural environment with healthy functioning ecosystems’* and places Nature at the centre of public sector decision-making in practical terms.

The Nature Recovery Action Plan (NRAP) 2020 - 2021 aims to operationalise Nature recovery priorities, objectives and indicators across government and local partners, such as NGOs and community groups. The plan makes Nature recovery a strategic, cross-departmental programme rather than merely being a marginal part of policy.

The Welsh Government and partners have funded a Nature Networks programme and a dedicated Nature Networks Fund aimed at strengthening the resilience and connectivity of protected land and marine sites across Wales, enhancing biodiversity, and helping deliver ecosystem-scale Nature

recovery. In 2025, the government announced over £10 million was to be given to thirteen projects from the Nature Networks Fund, covering woodland restoration, habitat recovery, species protection, and community-led conservation efforts. This further illustrates a national-level, institutional effort to reconnect people with Nature and demonstrates the alignment of the cultural and intergenerational connections between Welsh heritage and Nature. In 2021 The Senedd declared a Nature Emergency in recognition of human induced declines in biodiversity, and this has formed part of the backdrop of NICW's policy framework.



However, whilst legislation and policy developments have been hailed as being progressive, biodiversity is continuing to decline in Wales. In a recent report by Audit Wales it was found that only 50% of public bodies are complying with the biodiversity duty. This is, in part, why NICW has argued for the need to trial and test governance changes which incorporate the voice of Nature, as well as the legislative and policy measures being employed by the Welsh government.

Introducing a Nature Guardian into public bodies, if done meaningfully, could strengthen the delivery of these statutory requirements, rather than creating new burdens. Despite the progressive legislation enacted, there is still a lot of work to be done to halt the decline of biodiversity and restore Nature. Using governance models to bring the voice of Nature into decision-making structures could work alongside the existing legislative frameworks and help make the policy pledges a reality.

3.2 Institutional context & the pilot

NICW is an independent, non-statutory advisory body that provides recommendations to the Welsh Government on long-term strategic economic and environmental infrastructure needs. Established in 2018, its purpose is to assess and make

recommendations on Wales' infrastructure requirements over a 5–80 year period, taking into account the Nature and climate emergencies. It is accountable to the Welsh Ministers for the quality of its advice.

In October 2024 NICW wrote a report titled *Building Resilience to Flooding in Wales by 2025*, suggesting a number of recommendations to the Welsh government, including “*Nature as a stakeholder, set up the necessary mechanisms to incorporate Nature as a key stakeholder by 2028, giving Nature a voice around the table and considering opportunities to enshrine natural assets in law, or updating the Environment Act 2015, to give rights to natural assets in decision-making.*”

Following this recommendation and prior to it being taken up elsewhere, NICW felt they could be a pathfinder and test the model themselves. Hence, they commissioned the *Nature on the Commission* thought piece which made important recommendations on how to ensure the appointment could be robust and impactful.

Drawing on the work of Faith in Nature appointing Nature to the Board in 2022, it outlined that *"Importantly, this role should not simply fall to an existing commissioner. It should be a new position, filled by someone with the expertise, passion, and independence to speak up for Nature. At Faith In Nature, guardians are a rotating group of earth lawyers, conservationists, and scientists, and their mandate is to question, challenge, and champion Nature's needs."*

The Commission has described the role as a six-month pilot designed to explore how *"listening to Nature from within a Commission structure"* might shape long-term infrastructure planning and investment. As the first public sector body in the UK to appoint a Nature Guardian in an advisory capacity, NICW offers a precedent-setting model. It also provides an opportunity to make practical recommendations for other organisations, particularly within the public sector, wishing to share decision-making power with Nature and formalise Nature's voice within governance.

4. Representing Nature

This section will give an overview of some of the ways that Nature has been represented and given rights in the UK and internationally. It will draw on some governance case studies which help inform the principles and recommendations that public sector organisations might want to consider in [section 6](#) below.

4.1 Nature on the Board

Some of the clearest precedents for a Nature Guardian model piloted by NICW come from Nature on the Board in the UK private sector. Nature on the Board is a governance approach that seeks to formally embed the interests of the natural world within organisational decision-making by giving Nature a designated voice at board level. This is typically achieved through the appointment of a Nature Director, or Nature Guardian, whose remit is to represent the needs of Nature alongside human and financial considerations. Rather than treating Nature as an external factor or risk to be managed, Nature on the Board reframes Nature as a stakeholder with interests that must be actively considered in strategic decisions.



Faith in Nature

In August 2022, [Faith In Nature](#) became the first company globally to put Nature on the board, they put the following measures in place:

- Under the revised articles of association, the company defined its “objects” to include a commitment *“to have a positive impact on Nature as a whole and to minimise the prospect of any harmful impact ... on Nature”*.
- To operationalise this, a Nature Director was appointed, represented by human guardian(s), whose role is to represent the interests of the natural world (all non-human species, habitats, ecosystems) in board decisions.
- The Nature Guardian(s) have the same formal rights as other directors, the right to speak and vote at board meetings on any issue, the right to access information, to consult external experts, and to call for expert advisory committees when needed.
- Writing about the collaboration with Lawyers for Nature in the [Green Alliance Blog](#), Brontie Ansell said: *“For far too long, Nature has been unable to speak for itself. Giving it a seat at the table has huge potential to change this and move the dial on action.”*

House of Hackney

Inspired by Faith in Nature, [House of Hackney](#) became the second company in the world to legally appoint a Director for ‘Mother Nature and Future Generations’ to their board.

- This groundbreaking move represents a bold commitment to ensuring that every decision made by the company prioritises the well-being of both the planet and future generations.
- For the first time, a Guardian for Mother Nature **and Future Generations** has been granted the right to sit on the board of a company. This role is to ensure that all business decisions, from product development to corporate strategy, are rigorously evaluated for their impact on the environment, human well-being, and the legacy we leave behind.
- The Mother Nature and Future Generations Director works closely with senior leadership and departments to drive meaningful change. This collaboration has led to the creation of three strategic pillars to guide the company’s regenerative efforts:
 1. Nature Royalties & Capital Flows
 2. Regeneration & Restoration
 3. Activism & Influence



As well as being innovative and experimental, both these appointments have also raised key questions, similar to the ones raised by NICW and explored in this report – *how can one human sufficiently represent the complexity of entire ecosystems, whether such appointments go beyond*

symbolism to generate real systems change, and can Nature actually have an impact on the decisions being made in the board room? Importantly, these examples also provide principles of how to mitigate some of those queries and can provide important learning on how best to do so.

4.2 Rights of Nature

The Rights of Nature philosophy underpins the move to give Nature a right to be heard and represented in decision-making spaces. [The Global Alliance for the Rights of Nature](#) defines Rights of Nature as *“the recognition that our ecosystems – including trees, oceans, animals, mountains – have rights just as human beings have rights. Rights of Nature is about balancing what is good for human beings against what is good for other species, and what is good for the planet as a world. It is the holistic recognition that all life, all ecosystems on our planet are deeply intertwined. Rather than treating Nature as property under the law, Rights of Nature acknowledges that Nature in all its life forms has the right to exist, persist, maintain and regenerate its vital cycles.”*

The definition asserts that we, as people, have the *“legal authority and responsibility”* to enforce these rights on behalf of Nature. NICW’s Nature Guardian pilot is an example of giving Nature the right to be present, to be heard, and to be part of the decision-making process.

International Rights of Nature movements provide examples of giving Nature rights and how this can manifest and impact law and governance. In 2008 [Ecuador’s Constitution](#) enshrined the **Rights of Nature (Pachamama)**, recognising **Nature as a rights-bearing entity** with the *“right to integral respect for its existence and for the maintenance and regeneration of its life cycles, structure, functions and evolutionary processes.”* Articles 71–74 enable any person or organisation to enforce the Rights of Nature, regardless of direct human harm which represents a radical shift from traditional environmental law, (which usually requires proof of harm to people or property).

Courts in Ecuador have established precedents affirming that rivers, forests and ecosystems have rights which were violated, and remedies often focus on ecological restoration rather than financial penalty. Representation is distributed, not singular, which means that NGOs, community groups, Indigenous organisations and citizens can all bring cases on behalf of Nature, reflecting an approach that helps avoid the concentration of only hearing from one voice.

The Whanganui River, New Zealand

In New Zealand, the Whanganui River was **granted legal personhood**, recognising it as an indivisible whole with rights that are represented by legally appointed guardians who act on its behalf.

- In [2017 the Te Awa Tupua \(Whanganui River Claims Settlement\) Act 2017](#) recognised the Whanganui River (whānau waterways and catchment) as Te Awa Tupua as a legal person, with all rights, powers, duties and liabilities of a legal entity.
- To represent it, the Act created the office Te Pou Tupua “the human face and voice” of Te Awa Tupua. Te Pou Tupua is composed of two guardians, one appointed by the Crown

(government), and one appointed by the relevant Māori Iwi (local communities with interests in the river).

- These two guardians act jointly to speak on behalf of the river, protect its health and well-being, uphold its values (cultural, environmental and spiritual collectively referred to in the settlement as “Tupua te Kawa”), and manage any treaty funds (the settlement included a fund for river regeneration and maintenance).
- Beyond the two-person guardian office, the governance framework includes a broader multi-stakeholder strategy group “Te Kōpuka”, which brings together “iwi”, local and central government, environmental and community groups, industry and recreational users. This group supports development of the river-strategy plan and facilitates collaborative decision-making across all interests in the catchment.

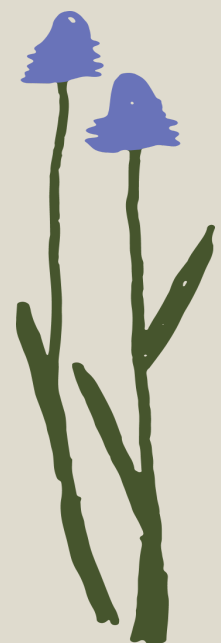
Rather than leaving representation of the river to one human actor, or to the state alone, the model deliberately shares guardianship between indigenous and state actors and embeds wider, multi-stakeholder collaboration. It aims to honour the river’s legal personhood and its physical, spiritual and cultural integrity.

These examples illustrate approaches that move beyond conventional human-centric legal frameworks, providing practical ways of embedding Rights of Nature into decision-making and giving a voice to non-human entities. They offer lessons for the design of Nature Guardian roles in other contexts, including public-sector bodies like NICW.

4.3 Nature as advisor

The voice of Nature can also be incorporated into governance models that are not legally binding. These models demonstrate a growing shift towards giving Nature a structured and influential presence within decision-making processes, even where the role is not legally entrenched, such as through statutory or formal board appointment.

Across the corporate landscape, a role for Nature is increasingly being given formal presence at executive level, such as a Head of Nature position. This signals a transition from reaching sustainability and ESG targets, to creating a specific role for Nature. Over the past five years, several global companies have introduced new leadership positions specifically centred on Nature. Lombard Odier Investment Managers and the Environment Bank have both appointed a ‘Chief Nature Officer’ to their executive leadership structure. Both Lloyds Banking Group and NatWest have appointed ‘Head of Nature’ positions.



While it is encouraging to see roles for Nature emerging within large corporations, there is often limited transparency and external accountability, raising concerns that such positions may become symbolic or constrained by commercial priorities. Where incentives, governance structures and risk-based framings remain tied to financial performance, **these roles risk reinforcing existing systems** rather than genuinely representing the interests of the more-than-human world.

5. Nature Governance in the Public Sector

5.1 Why should public sector bodies do this?

In the UK, we are facing multiple crises, with stark warnings about the state of biodiversity and climate where the UK has been described as “one of the most Nature-depleted countries on Earth” in the most recent State of Nature Report, and the decline continues unabated. We will only address this if we change course and this requires deep systems change, to rethink how we are governing and making decisions about Nature.

The UK has set ambitious targets to address Nature loss through the Global Biodiversity Framework, but these targets are not being met. Giving Nature a right to be heard, represented and properly considered in the public sector is now needed more than ever.

Guardians advocating for Nature in the public sector can act as a way of connecting national strategy with local communities and local Nature recovery work. The specific remit to speak for Nature also means Nature guardians or advocates are focused on the duties and responsibilities the UK government has committed to Nature, thereby strengthening the delivery of legislative policies to restore biodiversity and protect Nature.

A Nature Guardian in public sector bodies can help weave considerations for Nature into all decision-making, rather than considerations being made in silos. This can be a way to speed up the process as they do not need to be made by a separate committee or body. As [Simeon Rose](#) notes in relation to the impact on Faith in Nature, this change has not only influenced the company's culture but has also expedited decision-making processes related to Nature. By integrating environmental considerations directly into the boardroom, Faith in Nature has been able to implement changes more swiftly:

“In essence: the biggest change is in mindset. But real, tangible changes have been seen too – and though you might argue some of the decisions might have happened anyway, there is no doubt that Nature on the Board has caused them to happen quicker.”



There is real power in the step NICW has taken in this pilot, it is a bold move, and one which will hopefully inspire other areas of the public sector to follow suit.

Nature in UK Policy

The UK Government has appointed Ruth Davis OBE as a 'Special Representative for Nature', whilst not being underpinned by Rights of Nature philosophy per se, it is still described as a 'landmark first.'

Steve Reed (the Environment Secretary) said: *"We depend on nature in every aspect of our lives – it underpins our economy, health and society – and yet progress to restore our wildlife and habitats has been too slow. Ruth's extensive knowledge and expertise will be vital to help us deliver on our commitments to put nature on the road to recovery."*

Ruth Davis is described as *"as an advocate for nature"* and when appointed she said *"The government has recognised that the nature crisis is of equal gravity to the climate crisis; and that we cannot tackle one without addressing the other. Ecosystems and the species they support are essential to maintain food security, reduce health risks and manage the impacts of rising global temperatures."*

5.2 An overview of governance, bureaucracy and statutory constraints

Despite the considerable opportunities, embedding the voice of Nature within public-sector governance brings complexities that are distinct from those faced by private organisations such as Faith in Nature or House of Hackney, and large banks and organisations who have the ability to create advisory positions with little regulatory oversight.

Public bodies operate within statutory frameworks, ministerial accountability and budgetary scrutiny, with decision-making shaped by procedural requirements, risk management, and political cycles. Unlike private businesses, which can amend articles of association relatively quickly, public-sector governance requires justification, evidence-based processes, and in some cases, legislative change. Public bodies operate within legally defined mandates and procurement processes, which shape and sometimes limit the ability to legally embed experimental roles such as a Nature Guardian.

A legal appointment in the public sector, whilst being impactful, could result in lengthy negotiations and protracted time waiting for governments to be persuaded to pass legislation or legally appoint a Nature Guardian into a public body. Therefore, different considerations are required to ensure an appointment (if it is not legally embedded in a particular constitution) has impact, longevity and meaning.

5.3 Nature as advisor model used by NICW

NICW's current approach positions the Nature role as an advisor or consultant, rather than a statutory or legal appointment.

BENEFITS

- Implementable without legislative changes being made.
- Enables rapid piloting, iteration and learning.
- A Nature Guardian can work with flexibility in the public body to provide specialist input into decisions being made without waiting for legal or political implementation.
- Rights of Nature underpins the work (albeit not expressly in legal terms).
- It can be more palatable for all involved as there is little entrenchment of the position.
- The role can be held by one person or as a committee or a combination of both.

DRAWBACKS

- Influence depends on institutional willingness to listen, rather than a legal obligation or statutory declaration.
- Unlike appointing a legal guardian or board director, a consultant has no formal decision-making powers.
- Their continuation is dependent on the priorities of the public body, funding cycles and political support. If political support changes, there is a risk that the role could be terminated and there would not be the legal entrenchment embedded in the roles within the private sector described above.
- There may be transparency issues when tracing exactly what influence Nature has.
- It is difficult to enshrine constitutional safeguards - such as mandatory reconsideration where Nature disagrees with the outcome.
- Disclosure requirements are not often put in place by the organisation. This can hinder real accountability where scrutiny of deliberations is not possible.



6. Developing principles for Nature representation

This section will identify some foundational principles for Nature representation in the public sector. It draws on the principles and case studies discussed and makes some practical recommendations about how a public body can bring the voice of Nature into decision-making spaces.

There are a number of options outlined below, which do not all need to be employed by every organisation. However, a variety of possibilities have been included to ensure there is a mechanism or option for a wide range of public sector organisations.

6.1 A range of voices for Nature

The Commissioners have questioned whether a single individual can meaningfully represent something as vast and multi-layered as *Nature*. The term itself is not singular, it encompasses landscapes, species, ecosystems, processes, and relationships, each carrying different priorities and vulnerabilities. Even when a working definition is agreed, representation inevitably involves selecting which elements are prioritised, and which are not. This raises a core challenge for any Nature Guardian model: *how can one voice speak on behalf of such ecological diversity, and what mechanisms are needed to ensure balance and fairness?*

Below are some suggested practical ways to ensure that a range of voices are included in the decision-making process:

- Allowing the Nature Guardian ***time and budget to consult external experts*** helps to ensure that multiple voices and expertise from a wide array of areas are included.
- Establishing an advisory panel or working group to support the Nature Guardian can also support their work. Examples of external people who could be consulted are: ecologists, environmentalists, lawyers, conservationists, Indigenous knowledge holders, scientists and local community voices.



Future Everything was the first CIC to appoint a Nature Director to their board. During the process they set up a working group to gain insights and knowledge from a number of experts who fed into the implementation model and ultimate appointment of a Nature Director.

The working group was composed of Nature lawyers, researchers in multispecies justice, artists, technologists, funders, Indigenous knowledge holders, and other individuals who brought specialist knowledge. Over multiple workshops, they discussed topics such as:

- How to define 'Nature' – a Guardian could represent a specific part of Nature (such a river or forest), or the entirety of Nature, if it is the entirety of Nature, what does that comprise? Or is it Nature and Future Generations?
- What human representative structure makes sense (rotating, fixed, advisory, voting powers)?
- Legal, ethical and colonial risks or pitfalls (how to avoid anthropocentrism, tokenism, etc.)
- What operational, financial, and governance changes would be needed to institutionalise the role?

- Rotating or sharing Guardian arrangements can help **keep the role fluid and diverse**, either time-based so that there is a finite amount of time any one person can be the voice for Nature, and/or theme-based (e.g., freshwater, soils, species, climate, cultural landscapes), or a mixture of different disciplines.

Faith in Nature has, at times, had more than one Guardian to carry out the role of the Nature Director, to ensure there is not a singular voice in the position. They have always allowed for separate budgets and time for their Nature Director(s) to consult with external experts as and when required.

- Consider establishing a mechanism for recognising when a matter specifically **relates to Nature** and when advice is needed from the Nature Guardian, so they are able to identify clearly when **external advice or expertise** should be included.

Faith in Nature specifies when a decision is a 'Nature Related Matter' which means the Nature Director can have more time and access to information to determine the outcome. This wording was inserted into their Articles of Association, but could form the part of an internal policy in a public sector organisation: *"In respect of any Nature Reserved Matter, the Nature Guardian may provide written materials to be discussed at board meetings to be accompanied with the agenda of the meeting."*

Faith in Nature has a sub-committee which discusses Nature Related Matters prior to any board meeting and the Nature Director can consult with external experts at any time if needed.



6.2 Accountability and transparency

Accountability and transparency measures ensure that there is internal and external oversight and an ability for the role to be scrutinised publicly. This ensures that the role has power, influence and impact. This section suggests some ways this can be achieved.

- Consider **formal reporting mechanisms**, such as requiring the Nature Guardian to produce regular reports on advice given, decisions influenced, and ecological outcomes.

At Faith in Nature the Nature Director is given the right to write a section of their end of year report, which is published and available to download on their website. The Nature Director's section is unfettered by the board and a place where they can write about the past year with no editorial oversight from the company.

- Provide the Nature Guardian with **a right to comment or dissent** - guarantee they have the right to issue formal dissenting opinions in reports or communications where their recommendations were not adopted.
- **Maintain clear records of the decisions being made** and consider the ability to publish summaries of the Nature Guardian's decisions and/or deliberations and the impacts on Nature.
- Consider governance controls on selection processes to **ensure impartiality** and no bias on the part of the public body.
- Ensure **budgetary independence**, to provide a dedicated budget to enable the Nature Guardian to seek external expertise, undertake research, or consult as and when required.
- Decide on the **whistleblowing and ethical safeguards** for the role, consider extending the organisation's whistleblowing policy to include ecological concerns to protect those who speak up on Nature's behalf.



Tony's Chocolonely have a unique accountability structure, that allows their Mission Guardians to monitor decisions, investigate complaints, and safeguard the company's long-term purpose.

- They have independent authority and the company cannot amend its mission-related clauses without their approval, and they serve as a transparent check on management's actions and alignment with ethical commitments.
- If internal resolution fails, the Guardians have explicit rights to make their concerns public, a rare and powerful accountability measure. They can publish a two-page spread in Tony's Annual FAIR Report or, in more serious cases, place statements in national newspapers across key markets to alert the public if the company drifts from its mission.

6.3 Embedding the role of Nature Guardian in decision-making structures

This section will outline how a Nature representative's role can be embedded in a public sector organisation to try to achieve longevity, stability and structure.

- Consider creating **formal Terms of Reference/Protocol** defining the role, powers, responsibilities & limits of the Nature Guardian's role, include reference to:
 - Access to information
 - Consultation with experts
 - Allocated time & research capacity
 - Dedicated budget
 - Attendance at all relevant decision forums
- Consider having a written contract for the Nature Guardian, including their rights, responsibilities and access to information.
- Consider the **timing of the appointment** – think about the work flow patterns and programme of work in the public sector body – *when should the Nature Guardian be brought into the room in order to have the most impact?*
- Consider protocols for resolving conflicts raised by the work.



The Ocean on the Board - Scottish Association for Marine Science (SAMS)

This marine science charity recently designated one of its trustees to speak for the ocean at its board meetings. They spent time considering their governance measures and how this will work, saying: *“This might sound like a trivial gimmick, even whimsical. But after several months of careful discussion and debate, the trustees and I are convinced that even with a strong empathy for ocean conservation and a well-informed understanding of marine environmental matters.”*

They also established a working group to decide how it will practically operate, *“For example, choosing between appointing one person (perhaps, an environmental lawyer) or a larger working committee to represent the voice of the ocean at each board meeting. Whatever the outcome, trustees will be holding our organisation to account from a less anthropocentric perspective.”*

Consider mechanisms to **protect the role from political volatility** or change, such as:

- Fix a minimum term length for the Nature Guardian, to prevent premature removal without due process.

- Attempt to **build in cross-party support** to reduce dependency on a single administration or political party.
- Establish renewal mechanisms through external review, rather than internal review, to try to ensure longevity and independence.
- Try to develop a **roadmap for statutory recognition**, consider how this can be embedded in the statutory frameworks, what needs to change and how can this be achieved

Zoöp Model

The Zoöp Model, developed by the Zoöconomic Institute in the Netherlands, is made up of the following elements:

- The Zoöp model makes the interests of nonhuman life part of organisational decision-making. It assigns independent representatives to organisations that adopt the Zoöp Model.
- The ‘Speaker for the Living’ is a human representative appointed to represent the ‘other than human’ directly within the organisation. This person acts as **advisor, advisor-observer, and ecological counselor in decision-making**. They are not employees of the organisation being governed, instead they are contracted via the Zoöconomic Foundation, preserving independence and reducing conflict of interest.
- To qualify as a Zoöp, an organisation must undergo a baseline assessment. It then commits to a Zoöconomic Annual Cycle, a structured process guiding the integration of non-human interests into its organisation.
- Every year, Zoöps set specific regenerative goals tailored to their context, this could be restoring habitat, reducing harm, changing materials, altering land use, or shifting behaviour. **Progress and outcomes are measured and communicated transparently, both internally and externally.**
- The ‘Speaker for the Living’ facilitates a learning-oriented, participatory approach, they bring ecological knowledge, encourage multi-species thinking, and help the organisation move towards a more Nature focused approach in its operations and decision-making.

6.4 Reflexivity and learning

This work is pioneering, and its long-term impact will depend on the creation of a community of practice and the open sharing of learning as the model develops. For any innovative governance approach, particularly one being piloted within a public-sector context, there is a clear need for reflection, flexibility and ongoing adaptation.

Embedding learning into the design of the model ensures it remains responsive to institutional, social and ecological change.

This section outlines practical approaches to support continuous reflection, evaluation and improvement:

- Consider building in ***scheduled reflection points*** to assess how the Nature Guardian's role is working and what could be improved. Consider using an independent facilitator.
- Develop a repository of ***research and learning documents, case studies, and examples of successful interventions*** which can be shared with others wanting to do this work.
- Invite peer review from organisations running similar roles (e.g., other Nature Guardians, Rights of Nature bodies, Nature Governance experts).
- Provide ongoing training in Nature governance for those involved in the work
- Make the ***reflections and learning visible by publishing reports and reviews***.
- Encourage and feed into ***a community of practice***, by participating in open and public facing events, consultations or public learning forums where the community impacted by the decisions, as well as other organisations testing similar models, can ***share knowledge and experience and learn from each other***.

Make findings open source and accessible: **Faith in Nature** published an open source toolkit for companies interested in putting Nature on the board. **Lawyers for Nature** have published an open source Nature Representation Pathway for Community Interest Groups.

The importance of remaining flexible and open to new ways of thinking about issues:

- Nature Guardians cannot be expected to always give a decision on behalf of Nature – instead the vast majority of time is spent opening the space for dialogue, discussion and broadening the lens applied and this can be just as valuable.
- Allow time for change to manifest in the organisation and think outside of the normal parameters we use to measure impact – changes can be small and incremental and can occur in unlikely places, such as cultural mindset, shifts in language, and people expressing alternative points of view.

The example below demonstrates that recognising a new stakeholder's rights and the same being represented may not have an immediate impact, but its impact can be felt years into the future.

Clara Abbott and Lettie Pate Whitehead

In Nature's Boardroom, Simeon Rose discusses the significance of Clara Abbott being the first woman appointed to the board of any major company as the director of Abbott Laboratories in 1900 and subsequently, Lettie Pate Whitehead being the second woman appointed to the board of a major multinational public corporation, as a director of Coca-Cola in 1934.

There are no public minutes or records of the decisions they made in those boardrooms, so we have no way of knowing what impact, if any, they had



on the decisions that they were party to. However, their right to be present, to speak and to hold influence was recognised in a space that had hitherto been occupied only by men. While they were not appointed specifically on ‘Women’s issues’ there can be no doubt that a woman was, in fact, present and would have brought a unique perspective to the discussion.

The right for these two women to take up a role on a board of a company has in turn paved the way for the many women who sit on boards today. There are parallels that can be drawn with public sector bodies recognising Nature to be a stakeholder, with a right to be present, represented and part of the decision-making process.

6.5 Art, Culture and Nature

Drawing on the cultural history of place, and the ***specific relationships between Nature and the decisions being made***, can significantly strengthen the role. Embedding artistic, cultural and heritage perspectives within the Nature Guardian’s remit enriches understanding of how decisions affect landscapes, ecosystems and communities, and helps situate ecological impacts within their wider social and cultural context.

Furthermore, ***much of our language reflects our world view***. It can often be an overly dominant, defensive, war-like language that we use. For example, “lets target this”, “lets pull the trigger on that” and many more phrases which insinuate that we are somehow at war with Nature or we must control it. Public sector bodies could begin to host spaces where new forms of language are developed and used to replace this old style of communicating. While this seems like a small change, language shapes every story we tell. It is the building blocks for how we behave and how we relate to others, including the more than human communities we interact with.

- Consider ***bringing Nature into the room***:
 - For example, during the board meetings at Faith in Nature, via the medium of film, a Welsh moorland is brought into the room.
 - At a recent River Summit hosted by Lawyers for Nature, participants were encouraged to bring a part of their river with them and talk ‘as the river’ when addressing the conference.
 - These things can be critiqued as tokenistic, but they do little to detract from the general proceedings and what they can do is refocus minds to the wider world, our connection with Nature and those that we can start to see as kin and fellow stakeholders. Ultimately if the critique is that it is pointless, then what is the harm in doing it.
- Consider engaging with the theory of ***politics of place***. This concept refers to the struggles, power dynamics, and negotiations over meaning, identity, and control within specific geographical areas, recognising that locations aren't neutral but are shaped by history, culture, economics, and contested claims about who belongs and how a space should be used. It may

be the case that the public body could travel to an area of Nature being discussed and make the decision after having experienced and explored the place in question.

- Consider ***rituals and ceremonies***, such as a gratitude to Nature piece as an opening or closing statement, recognising Nature as the infrastructure that supports all of us as humans.
- Consider involving ***artists and storytellers*** to feed into the project and to bring Nature to life. See below.





Artwork by Wales-based artist Prith Biant, interpreting the vision for a flood resilient Wales, 2050, commissioned by NICW.

This is an example of a local artist being commissioned for a report written by NICW and how art can be incorporated into the decision making processes that involve and concern Nature.

UK Rivers

The UK River Rights movement is an example of how local communities and local culture can help to galvanise action for parts of Nature. Inspired by Rights of Nature, it is gaining momentum and spreading across the UK. Increasingly, local councils (e.g., on the Rivers Ouse, Itchen, Rother, and the Hampshire chalk streams) are adopting Rights of the River charters that recognise rivers and ecosystems as living entities with inherent rights to exist, flow, thrive, and regenerate.

Local communities are often the drivers behind these initiatives and are increasingly protecting the local rivers they love through practical action and organising under the related idea of River Guardianship. Alongside these developments, several catchments, including the Wye, the Roding, and the Usk, have appointed river guardians to serve as the “voice of the river” in local decision-making.

A community of practice amongst river guardians working across the country is growing and driving the movement forward to have real impact and longevity on protecting our waterways.



The Goddess of the Wye with Angela Jones (Monmouth, 2023), from www.savethewye.org

7. Summary of Recommendations

Nature representation is bold, innovative and exciting work, and public bodies should be encouraged to trial this, as NICW have. Establishing communities of practice, holding public-facing events, exchanging learnings and resources will support wider adoption and improve collective understanding of how Nature can be meaningfully represented in governance. Organisations should be encouraged to take the step, to not be afraid to make mistakes, and to ask questions. As Simeon Rose says in [Nature's Boardroom](#) – no question is too “silly”!

Recommendations and practical suggestions from this report include ensuring multiple voices feed into the role with an array of expertise and knowledge, making the role and its responsibilities clear through formalised processes such as publicly available protocols or guidelines to help to ensure there is access to information and external expertise, and embedding accountability and transparency measures in order to ensure the role has impact.

Nature representation should be framed as a tool to help comply with existing duties and regulations for the public sector; it can speed up and help the decision-making process, rather than slowing it down. New guardianship placements should be approached as evolutionary models which are piloted, evaluated, iterated, and shared openly. Organisations adopting similar roles are encouraged to include local communities, art and culture, and to share and publish outcomes to enable the work to spread. This will allow replication and encourage innovation across the public sector landscape.



8. Conclusion

This report shows that Wales is uniquely positioned to lead in the field of Nature representation governance within the public sector. The cultural foundations explored here, from medieval poetry to contemporary post-industrial identity, from the Well-being of Future Generations Act, to the progressive environmental laws embedded in Welsh statutes, demonstrate a nation whose relationship with Nature is rich and connected. Wales has a history of turning cultural values into policy innovation; the appointment of a Nature Guardian at NICW represents the latest chapter in that trajectory. This is not a symbolic move, but one which is shifting towards recognising Nature as a stakeholder and a rights bearing entity and as the first public body in the UK to do so, there is much to be proud of.

The pilot has highlighted both opportunity and complexity. Representing Nature through a single guardian brings inherent challenges, however, carefully designed structures, access to multiple voices and expertise, transparent decision-making and clarity of the role can strengthen legitimacy and influence. As with all pioneering work, the test is not only whether Nature is present in the room, but whether its voice has power and legitimacy. Wales has the potential to move from a pilot model to a precedent for Nature Governance in the public sector and to become a global exemplar for public-sector Nature governance, where Nature does not merely inspire decisions, but is a stakeholder which actively guides them. New governance models are necessary if we are to turn the dial away from accelerating Nature depletion towards regeneration, restoration and a future in which human decision-making actively supports the living systems on which all life depends.



This report was commissioned and paid for by the National Infrastructure Commission for Wales (NICW). It was researched and authored by Brontie Ansell & Jessica Mond Wedd at Lawyers for Nature.

Citation: *Ansell, B. & Mond Wedd, J. (2025) Developing Principles for Nature Representation in Public Sector Governance: The Nature Guardian Pilot in Comisiwn Seilwaith Cenedlaethol Cymru/National Infrastructure Commission for Wales (Online)*

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Selected Further Reading

Celermajer, D., et al. (2022). Multispecies justice: Theories, challenges, and a research agenda for environmental politics. In G. Hayes, S. Jinnah, P. Kashwan, D. M. Konisky, S. Macgregor, J. M. Meyer, & A. R. Zito (Eds.), *Trajectories in Environmental Politics* (1st ed., pp. 116–137). London: Routledge.

This essay introduces the idea of multispecies justice in environmental politics and explores what it would mean to extend justice beyond humans. It outlines key theories, influences, and challenges involved in rethinking liberal political frameworks, particularly by broadening who counts as a subject of justice and how recognition is given. The authors emphasise the need to decolonise dominant political thinking and consider how a commitment to multispecies justice could reshape political practice and policy.

Chwalisz, C., & Reid, L. (2024). More-than-human governance experiments in Europe: Trends, opportunities, and challenges. DemocracyNext.

The report surveys emerging practices in Europe that explore how governance and policy design can incorporate the intelligences and interests of the living world beyond humans, mapping key experiments and shared concepts across a diverse set of practitioners. The report highlights the interdisciplinary and emergent nature of this work, notes significant gaps including Indigenous perspectives and technological experimentation, and reflects on both the solidarities and tensions shaping the field. It concludes by outlining opportunities and challenges for advancing inclusive, non-elitist more-than-human governance and proposes future directions for research, collaboration, and democratic innovation.

Cullinan, C. (2011). Wild Law: A manifesto for Earth justice (2nd ed.). Green Books.

In *Wild Law*, environmental lawyer Cormac Cullinan sets out an Earth-centred legal and ethical framework known as Earth jurisprudence. The book argues that human laws and governance systems should recognise the rights of the Earth and its communities, rather than treating Nature solely as a resource. By redefining humanity's role as part of, not separate from, the wider Earth community, *Wild Law* calls for legal and cultural change to protect ecological integrity, biodiversity, and the conditions necessary for all life to flourish.

European Environment Agency. (2023). Exiting the Anthropocene? Exploring fundamental change in our relationship with Nature. European Environment Agency.

The European Environment Agency briefing argues that current environmental crises are rooted in an anthropocentric “us vs. Nature” mindset and that transformative change in how societies relate to and value Nature, emphasising interconnection, intrinsic worth, and systemic transformation is needed to live sustainably within planetary limits. It reviews concepts like strong sustainability and deep ecology, highlights policy initiatives such as the European Green Deal, and calls for a shift from commodifying Nature toward governing in ways that integrate human and non-human needs.

Freeman, R. E. (1984). Strategic management: A stakeholder approach. Pitman.

Freeman's work introduces stakeholder theory, proposing that organisations should manage for the benefit of all stakeholders defined as any group or individual who can affect or is affected by a firm's objectives, not just shareholders, thereby broadening the purpose of business beyond profit to include ethical, social, and relational responsibilities. This framework reshapes strategic management by arguing that long-term success and sustainability depend on identifying, balancing, and aligning the diverse interests of stakeholders such as employees, customers, suppliers, communities and investors.

Gilbert, J., Soliev, I., Robertson, A., et al. (2023). Understanding the rights of nature: Working together across and beyond disciplines. *Human Ecology*, 51, 363–377.

Recognising the Rights of Nature is widely seen as a key shift for embedding ecological values into policy and management to address biodiversity loss, climate change, and sustainable development. However, research is still limited, mainly within the humanities and social sciences, and often disconnected from environmental sciences. Drawing on a multi-, inter-, and transdisciplinary project, the authors highlight shared themes across disciplines and argue that future research should be transdisciplinary, incorporating knowledge generated both inside and outside academia, to fully realise the potential of the Rights of Nature in tackling social-environmental challenges.

Gray, J., Wienhues, A., Kopnina, H., & DeMoss, J. (2020). Ecodemocracy: Operationalizing ecocentrism through political representation for nonhumans. *Ecological Citizen*, 3(20), 166–177.

The authors present a general argument for the political representation of non-humans that sits under the broad umbrella of ecocentrism but that does not rely on one specific non-anthropocentric ethical theory. The article argues for the political representation of non-human beings as a practical and inclusive way to advance ecocentrism without relying on a single ethical framework. The authors suggest that direct representation can better protect non-human interests than approaches that filter them through human priorities, and that it can strengthen Earth jurisprudence by embedding ecological concerns within everyday political decision-making rather than relying solely on courts.

Haque, U., & Tan, L. (2025). More-than-Human Assembly. Haque & Tan.

Haque and Tan's More-than-Human Assembly proposes an immersive, interactive environment for experimenting with cross-species deliberation and decision-making in response to the Climate Emergency, aiming to expand collective governance beyond humans to include the voices of non-human species through AI-mediated interfaces and participatory "citizen assemblies." The project builds on prior artistic and participatory work to explore novel democratic spaces that confront limitations of current governance systems and rethink political representation, agency, and cooperation among human and non-human actors.

Imbrogiano, J. P. (2024). De-anthropocentrification now: A call for problematizing revisions of human-animal positions in social thought. *Sustainability: Science, Practice and Policy*, 20(1).

This article challenges traditional ways of thinking about the relationship between humans and animals. It shows how many influential texts in modern social thought take a human-centred view for granted, and argues that these assumptions need to be questioned. The article proposes practical ways for researchers to move beyond anthropocentrism and suggests how the social sciences can adapt their methods to better support sustainable futures. It ultimately argues that social constructionism can be meaningfully extended to many non-human animals, with significant implications for understanding human capacities and experiences as part of a broader, shared social world.

Lambooy, T., et al. (2024). Nature as a stakeholder: Including Nature in corporate governance practices to meet the EU Corporate Sustainability Reporting Directive. *Journal of Environmental Law and Governance.*

Lambooy et al. review emerging Nature-inclusive corporate governance models that companies have adopted to respond to environmental pressures and comply with the EU's Corporate Sustainability Reporting Directive (CSRD), which requires extensive disclosure of environmental impacts, dependencies, and biodiversity-related information. Through qualitative interviews and legal analysis across several European jurisdictions, the authors propose four governance models. Those being Nature as Inspiration, Advisor, Director, and Shareholder. They offer frameworks for integrating Nature's interests into corporate decision-making and advancing more holistic sustainability practices.

Naess, A. (1973). The shallow and the deep, long-range ecology movement: A summary. *Inquiry: An Interdisciplinary Journal of Philosophy*, 16(1-4), 95-100.

Naess's deep ecology philosophy contrasts the "shallow ecology movement," centered on managing pollution and resource depletion primarily for human benefit, with the "deep ecology movement," which calls for a radical way of viewing the relationships between humans and Nature. He proposes deep ecology as a long-term ethical framework that recognises the intrinsic value of all living beings, calls for fundamental changes in human values and lifestyles, and redefines humanity as an integral part of the natural world rather than its master.

Oliver, T. (2020). The Self Delusion: The surprising science of how we are connected and why that matters. London: Weidenfeld & Nicolson.

Oliver challenges the notion that humans are independent, autonomous individuals, showing that on physical, psychological, and cultural levels we are deeply interconnected with other people, species, and ecosystems. The book argues that recognising these complex connections is essential for addressing global challenges and fostering a better future.

Pradhan, K. (2025). Articulating the theory of right-holding and the Rights of Nature under Earth jurisprudence. *UCL Journal of Law and Jurisprudence*, 14 (1), 70–103.

This article examines the idea of granting legal rights to Nature, a key principle of Earth Jurisprudence. It explores which ecological entities could hold such rights, how these rights might be structured, and evaluates different approaches by drawing on existing literature and real-world examples where the Rights of Nature have been applied.

Sheffield, D., Butler, C. W., & Richardson, M. (2022). Improving nature connectedness in adults: A meta-analysis, review, and agenda. *Sustainability*, 14, 12494.

This paper reviews evidence on how interventions can strengthen adults' connection to Nature, which is linked to psychological wellbeing and pro-environmental behaviour. The analysis finds that both direct and indirect, active and passive, single or repeated Nature experiences can increase Nature connectedness, with medium positive effects that are often sustained. The authors call for further research on diverse engagement activities, factors that promote lasting connection, and practical initiatives that encourage repeated interaction with Nature.

Shotter, J. (2006). Participative thinking: “Seeing the face” and “hearing the voice” of Nature. In Y. Haila, C. Dyke, A. Escobar, & D. Rocheleau (Eds.), *How nature speaks: The dynamics of the human ecological condition* (pp. 106–126). New York: Duke University Press.

Shotter explores the concept of participative thinking, emphasising that humans can engage with Nature not as passive observers but as active participants who “see the face” and “hear the voice” of the non-human world. He argues that this relational approach fosters a deeper understanding of ecological dynamics and the agency of non-human entities, challenging traditional detached scientific perspectives and encouraging co-creative, responsive interactions with the environment.

Stone, C. D. (2010). Should trees have standing? Law, morality, and the environment (3rd ed.). Oxford University Press.

Stone's book argues that the environment, including trees, animals, and ecosystems, should have legal rights. Originally published in 1972, it was a rallying point for the burgeoning environmental movement, launching a worldwide debate on the basic premise of legal rights that reached the U.S. Supreme Court. Updated for the 35th anniversary, the book reflects on the impact of these ideas on law, courts, and society, and considers contemporary issues such as climate change and ocean

protection, continuing to advocate for legal recognition of Nature to safeguard it for future generations.

Willmott, H. (2014). Science, governance and self-understanding: From anthropocentrism to ecocentrism? *Critical Policy Studies*, 8(1), 22–40.

Willmott critically examines how the dominance of an anthropocentric self-understanding of science and governance has shaped public confidence, scientific authority, and policy responses to environmental crises, arguing that this human-centred orientation limits science's capacity to address complex ecological challenges like climate change. He proposes shifting toward an ecocentric self-understanding, which reconceives science's role and governance through more inclusive, civic modes rather than purely technocratic authority and offers a more promising basis for responding to urgent socio-ecological problems.

