

# Wales Manifesto 2026

Restoration, Innovation, and Justice

Adferiad, Arloesi, a Chyflawnder

## Priorities for a bolder, brighter Wales:

- 1 Comprehensively end all types of new coal extraction
- 2 Deliver safety and habitat improvement at sites of opencast mining
- 3 Support mine water heat networks to deliver clean and affordable warm homes
- 4 Build world-leading green industry and innovation
- 5 Eliminate abandoned mine methane emissions

## Why This Election Matters

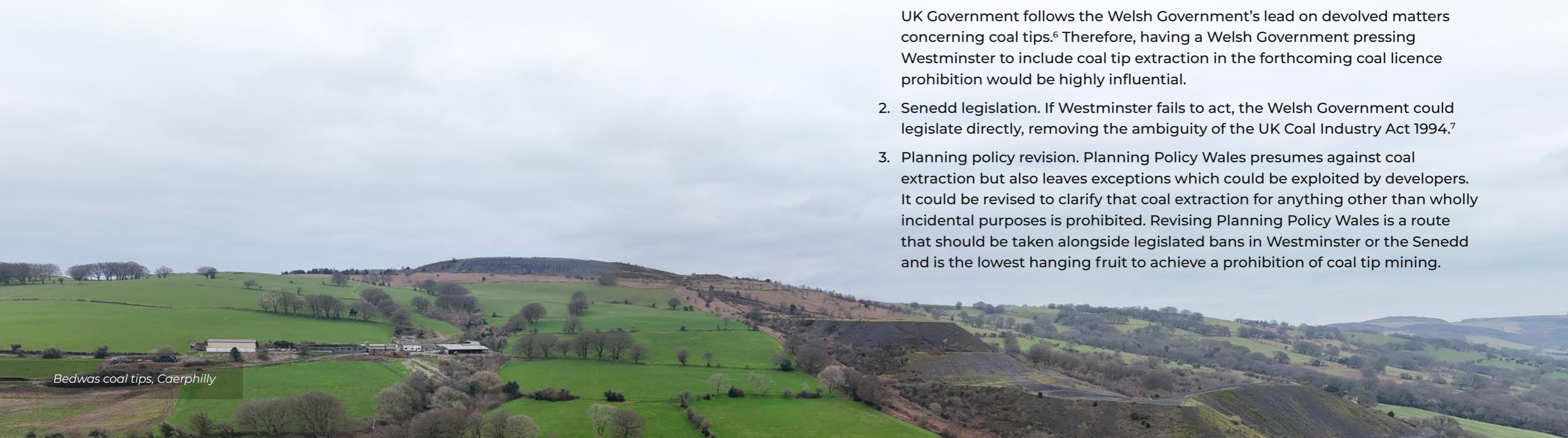


Wales stands at a decisive moment. For more than a century, coal shaped our landscapes, our communities, and our politics. Today, Wales has the opportunity to shape something very different: a future defined not by extraction, but by restoration, innovation, and justice. The next Senedd will determine whether Wales continues its transition away from coal for good and whether the communities who carried the weight of that industry finally receive the investment, restoration, and long-term security they deserve.

Since 2008, Coal Action Network has worked alongside communities to stop 45 proposed opencast coal mines across the UK. Strong resistance within these communities has helped to give the Welsh, Scottish and UK Governments the confidence to bring coal extraction to the brink of a complete end. Wales is now closer than ever to becoming post-coal. The decisions made in the coming term will determine how rapidly Wales embraces a coal-free future, and whether it manages its legacy responsibly, fairly, and with ambition.

The legacy of coal remains written into our land and the lives of communities still living beside abandoned mines and unrestored sites. Wales can choose to lead the world in how it addresses this legacy.

The next Government has the chance to make Wales a global leader in post-coal transformation. To do that, we are calling for all parties to centre a vision of restoration, innovation, and justice by adopting the following recommendations in their election manifesto.



Bedwas coal tips, Caerphilly

## Legislate a prohibition of coal tip mining

### Background

The UK Government's welcome ban on new coal extraction licences will only prevent a narrow definition of coal mining.<sup>1</sup> Their interpretation of the Coal Industry Act 1994 (with which leading environmental barristers disagree<sup>2</sup>) means that coal recovered from legacy tips is not a licensable activity and therefore would not be ruled out by the forthcoming prohibition.

The Welsh Government's Coal Policy Statement (March 2021) establishes a strong presumption against new coal extraction but leaves exceptions which could be exploited by developers seeking to extract coal under the guise of remediation.<sup>3</sup>

### Why Wales needs this

The Bedwas coal tips, in Caerphilly, are a live case study of developers proposing to remediate coal tips in exchange for the commercial rights to the coal within them.<sup>4</sup> This project could set a dangerous precedent for developers seeking access to the millions of tonnes of coal in the 2,590 coal tips across Wales.<sup>5</sup>

### Implementation

The next Government can provide clarity with a permanent prohibition on coal tip mining, ensuring that remediation serves public safety, not private profit. It has several options to achieve this:

1. Engagement with Westminster. The UK Energy Minister stated that the UK Government follows the Welsh Government's lead on devolved matters concerning coal tips.<sup>6</sup> Therefore, having a Welsh Government pressing Westminster to include coal tip extraction in the forthcoming coal licence prohibition would be highly influential.
2. Senedd legislation. If Westminster fails to act, the Welsh Government could legislate directly, removing the ambiguity of the UK Coal Industry Act 1994.<sup>7</sup>
3. Planning policy revision. Planning Policy Wales presumes against coal extraction but also leaves exceptions which could be exploited by developers. It could be revised to clarify that coal extraction for anything other than wholly incidental purposes is prohibited. Revising Planning Policy Wales is a route that should be taken alongside legislated bans in Westminster or the Senedd and is the lowest hanging fruit to achieve a prohibition of coal tip mining.

## RECOMMENDATION 2

### Deliver safety and habitat improvement at sites of under-restored opencast mining

#### Background

Thousands of hectares of land in South Wales have been open casted for coal mining and left in an under-restored, sometimes dangerous, state.<sup>8</sup> These derelict sites betray the promises made to nearby communities, who were assured they would eventually enjoy an improved local environment, paid for by years of disruptive coal mining. Over the past decade alone, the sites of four large opencast coal mines in Neath Port Talbot and Bridgend were left in a state beyond recognition.<sup>9</sup> The former East Pit and Margam coal mines left the voids flooded instead of being filled in. This cut costs after the mining company kept over 80% of the restoration fund.<sup>10</sup>

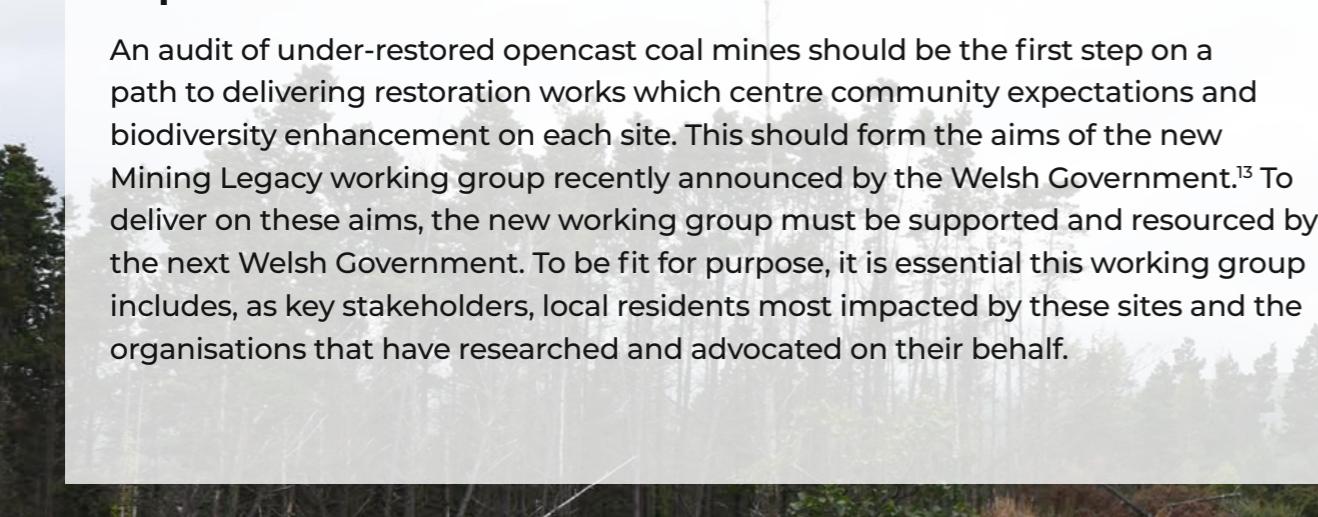
#### Why Wales needs this

The 400-hectare former opencast Ffos-y-fran site in Merthyr Tydfil is at risk of the same fate of under-restoration. After over 16 years of coal mining, the developer is refusing to release the £91.2 million fund it is legally required to pay out to fulfil its contractual restoration obligation.<sup>11</sup> Copying the practices at East Pit and Margam, the mining company is hoping to dash hopes that it will be forced to deliver on its restoration obligation.

All parties should guarantee that this injustice will not be allowed as it would make a mockery of the ‘polluter pays principle’ due to be enshrined within the Environment (Principles, Governance and Biodiversity Targets) (Wales) Bill.<sup>12</sup>

#### Implementation

An audit of under-restored opencast coal mines should be the first step on a path to delivering restoration works which centre community expectations and biodiversity enhancement on each site. This should form the aims of the new Mining Legacy working group recently announced by the Welsh Government.<sup>13</sup> To deliver on these aims, the new working group must be supported and resourced by the next Welsh Government. To be fit for purpose, it is essential this working group includes, as key stakeholders, local residents most impacted by these sites and the organisations that have researched and advocated on their behalf.



Nant Helen, Celtic Energy Ltd's fourth opencast site to face massive restoration cuts.

## RECOMMENDATION 3

### Set up a fund for mine water heat networks to deliver clean and affordable warm homes

#### Background

Heating homes and commercial buildings accounts for approximately 50% of total energy use in Wales.<sup>14</sup> An estimated 45% of Welsh households are at risk of fuel poverty.<sup>15</sup> About 50% of the population live within ex-coal mining areas and as a result there is a large heat demand in former coalfield communities.<sup>16</sup> Those communities are located close to abandoned deep coal mines, now filled with geothermally warmed water. This water can be used as a source of low carbon, secure heat which can be distributed via heat networks. It has already been proven in Gateshead, where the council-operated heat network supplies affordable, low carbon, secure heat through over 5km of pipes to businesses, homes, and public buildings.<sup>17</sup>

#### Why Wales needs this

The biggest barrier preventing local authorities from developing the heat potential under our feet is the cost and risk of boring into the historical mine workings, which can cost hundreds of thousands of pounds per borehole, without the guarantee of reaching the mine workings up to two hundred metres below. For many councils, this level of financial risk is impossible to justify within already stretched budgets.

#### Implementation

Prior to Brexit, local authorities could apply for EU funding to support this early-stage work.<sup>18</sup> Without a dedicated Welsh fund to de-risk a significant expense for projects, they will stall before they even begin, leaving communities locked out of innovation that could cut bills, reduce emissions, and support skilled local jobs.

A second barrier is the lack of specialist energy project development capacity within local authorities. Mine water heat networks require technical and commercial expertise that most councils do not have in-house. By creating a national fund, paired with regional development capacity, the next Welsh Government could bring expertise closer to councils, enabling them to move from ambition to delivery.



## RECOMMENDATION 4

# Build world-leading green industry and innovation

## Background

In March 2021, the Welsh Government committed to no new coal mining, becoming one of the first nations to do so. By taking this action, the Welsh Government recognised that coal mined anywhere increases the availability and use of coal everywhere in our globalised economy.

Although UK coal imports are declining year-on-year, a significant amount of imported coal is burned at steelworks (594,000 tonnes)<sup>19</sup> and cement works (395,000 tonnes)<sup>20</sup> around the UK. With the closure of Ratcliffe power station, and the transition of Port Talbot steelworks, the cement sector is expected to become the largest consumer of coal.

## Why Wales needs this

As Wales moves to rule out domestic coal mining, a continuing reliance on coal in 'hard to abate' sectors such as cement, risks simply 'off-shoring' the mining that supplies these industries. In 2024, the UK imported coal from Colombia, the EU, South Africa, and Venezuela (in order of quantity).<sup>21</sup> In Colombia, coal mining has caused mass displacement, diversion of vital water sources, and has been associated with assassination attempts on Wayúu community leaders resisting mining.<sup>22</sup>

Along with the electric arc furnace to be installed at Port Talbot, a low carbon cement sector would also pave the way for a heavy industry ready to supply a Net-Zero domestic economy. This move would open the export market for Welsh heavy industry to take advantage of the expected demand for low-carbon steel and cement from the EU's construction sector. This sector is gearing up for the EU's mandatory lifecycle carbon reporting and increasingly greener requirements for new large buildings from 2028 and all new buildings from 2030.<sup>23</sup>

## Implementation

It is therefore vital that the industrial strategy of the next Government supports and encourages the rapid replacement of all coal being burned at Wales' two cement works, using processes and technologies already proven at scale.<sup>24</sup> These include replacing coal with alternative fuels and substituting the clinker component of cement, which coal is burned to create, with alternative cementitious inputs.<sup>25</sup>

## RECOMMENDATION 5

# Eliminate abandoned mine methane emissions

## Background

Abandoned mine methane (AMM) is methane that continues to leak from coal seams long after mining has ceased. Methane is a highly potent greenhouse gas, over 80 times more powerful than CO<sub>2</sub> over a 20-year period, making rapid reductions essential for climate stability. In the EU, the Methane Regulation adopted in 2024 required countries to measure, mitigate and end AMM by 2030.<sup>26</sup> These efforts reflect growing recognition that unmanaged methane leakage from abandoned mines is a major, overlooked climate risk.

## Why Wales Needs This

Coal Action Network-commissioned research shows that Welsh mines are responsible for 49% of UK AMM (as of 2023). UK-wide studies estimate emissions using models rather than direct measurement, relying on assumptions about how methane leakage declines over time after closure. These models can be highly inaccurate, so much so that real emissions are suggested to be double the expected estimates.<sup>27</sup> As a result, Wales does not know how much methane is actually leaking from its extensive network of abandoned mines, leaving a major gap in Wales's climate strategy.

## Implementation

The EU's approach could inform Wales' own regulation:

1. Inventory: A full public register of abandoned mines, including their status (flooded, vented, sealed) within one year.
2. Direct measurement: Mandatory on-site methane monitoring within two years.
3. Mitigation planning: Development of site-specific plans to capture, flare, or eliminate methane emissions within three years.
4. Elimination: A prohibition on venting and flaring, ensuring methane is either captured for use or fully abated within five years.

This pathway would align Wales with emerging international standards.



There are 10 cement works in the UK, 2 of which are in Wales

