

Biodiversity Strategy Team
1-D (North)
Victoria Quay
Edinburgh
EH6 6QQ

24 September 2012



Dear Sir/Madam,

RE: A CONSULTATION ON THE 2020 CHALLENGE FOR SCOTLAND'S BIODIVERSITY

The Scottish Wildlife Trust (SWT)¹ welcomes the opportunity to comment on the Consultation on the 2020 Challenge for Scotland's Biodiversity.

The Scottish Wildlife Trust's central aim is to advance the conservation of Scotland's biodiversity for the benefit of present and future generations. We have a 25-year vision for Scotland in which we want to see a network of healthy, resilient ecosystems supporting expanding communities of native species across large areas of Scotland's land, water and seas.

We believe the way forward to protect and enhance Scotland's biodiversity and wildlife is to adopt an ecosystem approach to nature conservation and for society to recognise that healthy ecosystems are the foundation of Scotland's prosperity. The conservation of biodiversity is key to ecosystem health; without thriving biodiversity, ecosystems begin to malfunction, are less resilient to change and lose significant value.

General points

We are pleased that the 2020 Challenge highlights the importance of biodiversity to a successful future for Scotland. By calling for a step change, it has recognised that the past approach to conserving Scotland's biodiversity has not been successful and in order to halt the decline of biodiversity in the future more must be done to mainstream biodiversity conservation across all sectors; a key requirement of the Aichi targets (Strategic Goal A). The frame of reference for the 2020 Challenge should be the 20 Aichi targets.

The task for this strategy post publication is to promote to **all** government directorates, agencies and other public bodies and stakeholders, the socio-economic benefits of ecosystems and their services (above and beyond the environmental benefits) and the message that the key to sustaining ecosystem services is having healthy, species-rich and connected ecosystems.

We believe the fact that biodiversity is a vital component for ecosystem health must be strongly made from the outset to avoid confusion over whether this is an ecosystems or biodiversity strategy. In addition, it should be recognised that although a healthy natural environment can support sustainable economic growth (notwithstanding the argument over whether the latter can truly exist) some activities leading to growth can be detrimental to the natural environment and should not be supported.

¹ The Scottish Wildlife Trust's central aim is to advance the conservation of Scotland's biodiversity for the benefit of present and future generations. With over 32,000 members, several hundred of whom are actively involved in conservation activities locally, we are proud to say we are now the largest voluntary body working for all the wildlife of Scotland. The Trust owns or manages 120 wildlife reserves and campaigns at local and national levels to ensure wildlife is protected and enhanced for future generations to enjoy.

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Mainstreaming the value of biodiversity across all Government directorates and policy areas will allow decision makers to move towards delivering sustainable development and will show that conserving and enhancing biodiversity adds value to Scotland's prosperity.

With respect to the 2020 Challenge aims we believe that the statement of increasing the *general level* of biodiversity is rather subjective and therefore meaningless. It would be more helpful to state an aim which is aligned to the Convention on Biological Diversity's Strategic Plan: *to take effective and urgent action to halt the loss of biodiversity in order to ensure that by 2020 Scotland's ecosystems are resilient and continue to provide essential services*. The third aim should not be to *maximise* the benefits - as this implies over exploitation - rather it should be stated that we should *carefully manage* the benefits.

Although we are generally supportive of the thrust of the document and indeed, as biodiversity conservation practitioners we understand the language used and how we have arrived at this end point, we are not sure how useful this document, in its present form, will be to public sector workers who must be able to comprehend it and work with it if they are to carry out the 'biodiversity duty' under the Nature Conservation (Scotland) Act 2004. We believe that the final version must be set out in a way that engages with the public sector, be written with these practitioners in mind and show them how they can apply the strategy in their everyday workings.

CONSULTATION QUESTIONS

1 Healthy ecosystems and ecosystem services

Healthy ecosystems

We are pleased to see that the chapter advocates adopting an ecosystem approach to nature conservation as we believe this is the only way to protect and enhance biodiversity and ecosystems at the landscape scale. The desired outcome to see Scotland's ecosystems restored to and maintain in healthy condition reflects the Strategic Goal C of the Aichi targets.

We believe it would be helpful if this chapter stated, from the outset, that the key to 'healthy' ecosystems is species richness - i.e. biodiversity. We also believe it would be useful to state what a 'healthy' ecosystem is i.e. one that is species rich, connected to other ecosystems by an ecological network, fully functional and resistant to external pressures such as climate change. Linking biodiversity to ecosystem health would also show that this is still a strategy for biodiversity.

Public bodies

Whilst we are also supportive of developing ecosystem health indicators and of the adaptive management approach we believe it must be made clearer how the key steps such as encouraging and supporting ecosystem restoration will be implemented by public bodies.

One of the key delivery mechanisms for improving ecosystem health at the landscape scale will be through local authority development plans. Therefore it is vital that this chapter and indeed this whole strategy is made relevant to planners. We are not convinced that this document makes clear how their approach to planning will be different if they implement this strategy.

National Ecological Network

We are supportive of the reference to a national ecological network - indeed we would like to see a national ecological network (NEN) being funded and adopted across Scotland, not only will this allow species to move more easily between habitats, facilitating genetic exchange, but it is a vital adaptation mechanism in the face of climate change. The socio-economic benefits of a NEN arise not only from the added value of connecting people to nature but also from an increase in ecosystem health and resilience from which ecosystem services flow.

In recognition of the multiple benefits that are derived from an NEN, the Scottish Wildlife Trust, supported by the Scottish Government is holding a two day International conference on ecological networks early next year. The purpose is to explore the theory, science, practice and multiple benefits that arise from a national ecological network.

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The Scottish Wildlife Trust is a company limited by guarantee and registered in Scotland (registered no. SC040247). It is also a Scottish registered charity (charity no. SC005792)

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Local development plans

Local and strategic development plans, through opportunity mapping, should be used to identify where ecosystems and habitats can be connected and indeed where 'greening in' development can enhance connectivity. It would be helpful if planners had easy access to integrated habitat network modelling during local plan development. In addition, planners should be exploring landscapes in terms of ecosystems and ecosystem services and how their enhancement can be coordinated at a catchment scale. Perhaps this is too fine detail for this strategic document but thought needs to be given as to how planning will deliver healthy ecosystems.

SRDP

We are pleased that the strategy calls for the future SRDP to be aligned to deliver healthy ecosystems which accords with Aichi target 3. As we have already stated, this strategy must be implemented across all Government agencies, including those working on the reform of CAP so that the next round of agri-environment schemes are coordinated and capable of delivering healthy ecosystems at the landscape scale in each catchment.

Scottish Wildlife Trust's work

Scottish Wildlife Trust has pioneered and championed the ecosystems approach to nature conservation; we published Policy Futures Series 1, Living Landscapes in 2009.² In Policy Future Series 3, Climate Connections³ we make the case of how maintaining ecosystem health is essential in the fight against climate change and in maintaining our economy, prosperity and well-being.

Through our Coigach Assynt Living Landscape and Cumbernauld Living Landscape projects we are demonstrating through partnership working, how the landscape scale approach to nature conservation delivers multiple benefits. We are also developing guidance for planners on how to apply the ecosystem approach to planning, using the tools that they are familiar with.

2 Natural capital and resource efficiency

National capital

This chapter refers to natural capital and a natural capital asset index and is aligned to Aichi Strategic Goal D. For clarity, we recommend that both these terms need to be defined at the start of the chapter. It should be recognised that the stock of natural capital is dependent on ecosystem health which links to biodiversity.

Whilst it is appropriate to state that Scotland's economic growth is dependent on its stock of natural capital it should also be recognised that some forms of growth are not in any way sustainable and lead to over consumption and overexploitation of the very asset that this strategy is trying to protect and enhance for future generations. Efforts should be made to remove perverse incentives that lead to either a depletion in Scotland's natural assets or degrade the environment (e.g. increased greenhouse gas emissions, non-point source pollution, atmospheric pollution).

Business and industry have been drawing down on natural capital for decades and it is now time that they develop accounting techniques to assess their operational impact on biodiversity and 'give back' this draw down to be spent on conservation programmes. Nature can never, and should never, be commoditised as ultimately it is priceless – hence the need for regulation to protect and manage species, designate protected areas and prosecute those who damage the environment. However, it is no longer acceptable to continue to consume public natural capital for private profit without giving something back. Realistically, that 'something' needs to be given a monetary value and re-invested in natural capital stocks i.e. ecosystem, health.

One way forward is for businesses to be encouraged to adopt a performance framework that measures economic, social and environmental performance (or the three Ps: profit, people and planet) - the triple bottom line (TBL). Only a company that produces a TBL is taking account of the full cost involved in doing business.

² See http://scottishwildlifetrust.org.uk/docs/002_050_publications_Policy_Futures_Series_1_Living_Landscapes_1292841506.pdf

³ See: http://scottishwildlifetrust.org.uk/docs/027_104_publications_Climate_Connections_final_low_res_1306398243.pdf

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Biodiversity offsetting

With regard to biodiversity offsetting it should be stated that biodiversity offsetting should be seen as the 'last resort' in the mitigation hierarchy which is applied in environmental impact assessments. This chapter should stress the need for developments to first look to avoid, reduce, rescue, or repair environmental damage before exploring the offsetting or compensation route.

Biodiversity offset schemes exist in some form or other in more than 30 countries around the world. Established schemes operate in the United States (e.g. Wetland Mitigation Banking), Australia (e.g. Victoria - Native Vegetation Offsetting) and Brazil (e.g. National System of Protected Areas of the Nature).

Since 1976, Germany has been operating an ecological compensation system (the German Eingriffsregelung as defined in the German Federal Nature Conservation Act) - independent of the requirements under the Habitats Directive. The Eingriffsregelung requires developers to avoid impacts on nature and landscape; where unavoidable impacts occur, the developer must implement appropriate compensatory measures of nature conservation or landscape management. .

TEEB calculates that the emerging market in mandatory biodiversity offsets (e.g. US mitigation banking) is worth \$10 billion per annum and the voluntary biodiversity market is currently worth \$100 million per annum.

The Lawton Review - Making Space for Nature - A review of England's Wildlife Sites and Ecological Network was published in 2010. Section 6.3.4 of the report states:

Biodiversity offsets established through the planning process are another mechanism that could be used to enhance ecological networks. Offsets are activities designed to compensate for residual and unavoidable harm to existing wildlife sites caused by development activity.

It lists a set of principles that must underpin an effective offset system and most have these have been employed by Natural England in their biodiversity offsetting trials. Their guiding principles are to:

- not change existing levels of protection for biodiversity
- expand and restore habitats, not merely protect the extent and condition of what is already there
- contribute to enhancing England's ecological network by creating more, bigger, better and joined areas for biodiversity (as discussed in *Making Space for Nature*)
- be managed at the local level as far as possible
- be as simple and straightforward as possible, for developers, local authorities and others
- be transparent, giving clarity on how the offset calculations are derived and allowing people to see how offset resources are being used.

Major disadvantages of biodiversity offsetting could be:

- May be perceived as a 'license to destroy'
- Credits may be measured in terms of ecosystems services rather than intrinsic biodiversity value
- Metric calculation subjective
- Reliant on high quality data
- Metric is habitat based - not species based
- May not replace habitats like - for like
- Developments may not deliver local on-site biodiversity (as such they may not help 'connect people to nature') - rather the losses in local biodiversity would be 'compensated' for elsewhere
- Present mechanism is voluntary - needs to be placed on a statutory footing
- Complications may arise where developments cross local authority boundaries
- May lead to further habitat fragmentation if smaller developments only deliver greenspace on site that have little biodiversity value (e.g. amenity grassland)
- May be perceived to 'slow down' the planning process

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Peatlands

We are pleased that the strategy recognises the value of peatlands in mitigating and adapting to climate change. As the Scottish Government's manifesto pledge was to restore Scotland's peatlands we do hope that the restoration and enhancement programme mentioned here will be backed by appropriate funding.

We have championed the move towards a low carbon and high biodiversity economy in Policy Future Series 3 which includes calling for peatland restoration.

Scottish Wildlife Trust's work

With regard to natural capital, Policy Futures 1 recognised that the current economic system has spectacularly failed to value and protect ecosystems and biodiversity. It was stated that the future must lie in harnessing the power of the market to help deliver biodiversity conservation in a systemic, rather than piecemeal, way. This of course comes with a giant health warning and there will need to be robust guidelines developed before, for example, 'biodiversity offsetting' schemes are rolled out more widely. Perhaps most importantly there must be recognition that market mechanisms should be complementary to existing, often very successful, mechanisms such as regulation, incentive payments, protected area designations and the sizable effort of environment NGOs. There must also be a recognition that many places on the planet will simply be 'off limits'. The Trust also concurred with the World Business Council for Sustainable Development that future use of "mandatory market mechanisms will require complex partnerships involving business, governments and NGO's, and usually new legal frameworks to assure that ecosystem services are being bought and sold at full cost, that there is clear ownership of and accountability for the ecosystem services that are to be traded, and that there is competition amongst buyers and sellers to increase efficiency."

3 Biodiversity, health and quality of life

We agree with the laudable outcome of improving the health and wellbeing of the people of Scotland through investment in greenspace, nature and landscapes. This accords with the Strategic Goal D of the Aichi Targets. It should be stated that it is the quality of greenspace that is important rather than greenspace *per se*. Mainstreaming the strategy across government departments should see the health sector 'buying in' to the concept of nature having numerous health and wellbeing benefits. It should be stressed that the ecosystem services provided by designing in high quality green (and blue) infrastructure accords with the Scottish Government's preventative spend agenda.

Greenspace on your doorstep

A key step in delivering the outcome is to ensure that people in urban settlements in Scotland have access to a network of high quality natural greenspaces, that are no more than 300 metres from residence or workplace.⁴ This would need to involve, *inter alia*, local authorities ensuring that local development plans have policies to ensure developments incorporate high quality greenspace/green infrastructure.

In addition, another key step is to ensure that the built environment sector (e.g Architecture and Place in Scottish Government) recognises that designing quality places is as much about the quality of the 'green' features as it is of the 'grey'.⁵

Local biodiversity sites

There are over 3000 local biodiversity sites assigned because they contain biodiversity of high local value, many of which are close to urban settlements. Local authorities should be encouraged to conserve and enhance these sites and ensure that policies are in place so that they are protected from inappropriate development.⁶

⁴ See SWT's Natural Greenspaces in Towns and Cities:

http://scottishwildlifetrust.org.uk/docs/002_057_publications_policies_Policy_on_natural_greenspaces_June_2012_1339581874.pdf

⁵ See SWT's consultation response to Architecture and Placemaking

http://scottishwildlifetrust.org.uk/docs/002_057_publications_policies_Consultation_response_to_A_Policy_on_Architecture_and_Placemaking_September_2012_1346932242.pdf

⁶ See SWT's Local Biodiversity Site Policy

http://scottishwildlifetrust.org.uk/docs/002_057_publications_policies_Local_Biodiversity_Sites_policy_October_2011_1320168159.pdf

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With regard to learning outdoors, SNH's teaching in nature demonstration project should be rolled out to all primary and secondary schools so that teachers feel confident in taking classes outdoors.

Scottish Wildlife Trust's work

The Scottish Wildlife Trust has for a long time advocated the connection between high quality greenspace and health and well being. We have a policy on natural greenspaces in towns and cities and one on local biodiversity sites. We held a roundtable event in the Scottish Parliament in conjunction with British Medical Association Scotland on the health benefits of greenspace.

Our Cumbernauld Living Landscapes project has a mountain bike trail which was developed in partnership with funding from the Forestry Commission (FC). It allows local people to enjoy physical activity on their doorstep in a high quality greenspace. The local primary school (who were also supplied with bikes by the FC) uses the trail as part of the school's PE lessons.

As part of getting young people close to nature, the Trust runs 29 wildlife watch groups across Scotland and have over 5000 members aged between 5- 14.⁷ On our 120 reserves, we also host a series of events and activities throughout the year to engage people with nature.⁸ For instance at Jupiter Urban Wildlife Centre close to Grangemouth, we offer formal curriculum-linked education programmes all year round. Jupiter is a fantastic, safe environment for children to learn more about wildlife and the environment, with interesting and hands-on activities provided by our ranger team. We also run education sessions or guided walks for other community groups.

4 Wildlife, habitats and protected places - connecting nature

Of all the chapters in the consultation document, this is the one that does give us concern. The absence of a key step regarding 'species action' is alarming. This does not accord with Strategic Goal C: *To improve the status of biodiversity by safeguarding ecosystems, species and genetic diversity* and target 12. In Scotland we know that many of our priority species are declining; action and funding is required to help reverse this decline.

Although we agree that protecting places, habitat restoration, improving ecosystem health, decreasing habitat fragmentation will all help Scotland's wildlife and biodiversity, this strategy still needs a commitment to a targeted species management programme, which includes selected keystone and indicator species which link to wider habitats and ecosystem health.

This chapter needs to set out how and why the Scottish Biodiversity List will be revised - what is the proposed outcome and will keystone species be included? In addition, where do biodiversity action plans fit with the strategy and how will biodiversity indicators be chosen to show the broad state of biodiversity as well reflect the state of ecosystem health.

We agree that some farmland species are in a parlous state which is a reflection of intensive agricultural still practiced on some farms in Scotland. It is important that the next round of SRDP is designed in such a way to help deliver the priorities of this strategy.

We do not agree with the statement in 4.3.8: *with a core area of green infrastructure already in place, relatively little investment is needed to restore natural systems back to capacity*. Some areas of Scotland can be classified in the broadest sense as 'green' but are fragmented, based on monocultural land use and depauperate with regard to species richness. A key step must be to reconnect fragmented landscapes, increase the species richness of our ecosystems, identify and conserve keystone species and thereby start to restore ecosystem health.

Scottish Wildlife Trust's work

Scottish Wildlife Trust manages over 120 covering around 20,000ha in Scotland⁹. The Trust has divided the country into 8 areas in which the reserves are managed. In each of these areas there are local reserve convenors who take on a warden like role. In 2010/11 there were 79 reserves with

⁷ See SWT website: activities for children

⁸ See SWT website: events and activities

⁹ See: <http://www.rafts.org.uk/scottish-mink-initiative-news/>

http://scottishwildlifetrust.org.uk/docs/027__108__publications__Facts_and_Figures__conservation_on_reserves_2010_11_VL_Res__1310482460.pdf

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convenors who organise volunteers and local community groups to carry out practical conservation on their reserves.

The Scottish Wildlife Trust has established two large scale Living Landscape projects based around the Ben Mor Coigach and Cumbernauld Greenspaces reserves covering c. 45,000 ha. Both Living Landscape projects are collaborative ventures engaging a wide range of stakeholders including local landowners, local authorities, government agencies and other non-governmental organisation.

The Trust has 136 statutory designations across 75 reserves. These designations cover a wide range of ecosystems and species and are designed to provide a legal basis for conservation. The Trust is successfully managing these areas and the results of site condition monitoring up to 2010 showed that 96% of the features are in Favourable or Favourable Recovering condition.

The Trust is a partner in Saving Scotland's Red Squirrels project,¹⁰ Scottish Beaver Trial¹¹ and the Scottish Mink Initiative.¹²

5 Land and freshwater use and management

We are supportive of the outcome for a Scotland that has 'flourishing nature' and 'resilient ecosystems.' Resilience allows ecosystems to withstand and not be changed by, external pressures such as climate change - a key requirement is species richness and connectivity to maintain ecosystem health.

We agree that a key step is to align sustainable land management practices and for decision makers to adopt the ecosystem approach. We have been supportive of the Land Use Strategy and believe this strategy shows how land managers can deliver multifunctional benefits as well as their core land management objectives. In order to maintain Scotland's flow of natural capital for future generations it is essential and makes economic sense for land managers to be more resource efficient and do more with less.

Agriculture

As agriculture covers over 80 % of Scotland's land mass it is vital that the revised SRDP is aligned to the aspirations and proposed key steps of the 2020 Challenge and adopts an ecosystem approach to funding future agri-environment schemes.

We also want to see the reformed CAP moving away from subsidies which do not deliver multiple benefits above and beyond food production. At the same time CAP must deliver broad greening measures (such as ecological focus areas) in Pillar 1 (i.e. direct farm payments) which will affect the whole agricultural landscape. We believe a test of mainstreaming this biodiversity strategy will be how much influence it has on Scottish Government's thinking regarding its desired outcomes of CAP.

Much of what is stated as key steps in this chapter is covered by policies, guidelines and regulations overseen by a broad range of government departments and it is essential that biodiversity is mainstreamed and the ecosystems approach is adopted by **all** so that we really do see a coordinated and integrated response in which land managers are delivering environmental and biodiversity benefits above and beyond their core objectives (e.g. food production).

Locking up carbon

We are supportive of action to restore 100,000 hectares of peatlands to favourable condition. It is a step in the right direction, although this represents only c. 5% of the total peatland of Scotland. As we stated above, the Government's manifesto pledge to restore Scotland's peatlands must be backed by funding. With regard to the Scottish Forestry Strategy we would like to see the majority of the proposed planting of woodland (i.e. 100,000 ha by 2020) using native trees. At present 71 % of Scotland's forests are composed of conifers¹³ (with over half being Sitka spruce), we would like to see the balance shifted towards the creation of more native woodlands.

¹⁰ See: <http://scottishwildlifetrust.org.uk/what-we-do/scotlands-red-squirrels/>

¹¹ See: <http://scottishwildlifetrust.org.uk/what-we-do/scottish-beaver-trial/>

¹² See: <http://www.rafts.org.uk/scottish-mink-initiative-news/>

¹³ UK National Ecosystem Assessment 2011

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Ancient woodlands

With regard to ancient woodland, our most species rich habitat, which covers only around 1% of Scotland's land area, we believe this remaining ancient woodland resource should be afforded legal protection to help ensure there is no further loss or degradation of this precious national asset. Almost 50% of ancient woodland has already been degraded by being wholly or partly planted with commercial species (mostly non-native conifer). We strongly believes that these 'plantations on ancient woodland sites' (PAWS) must be gradually restored to at least 80% native species (scattered throughout the canopy).¹⁴

Scottish Wildlife Trust's work

Scottish Wildlife Trust has pioneered and championed the ecosystems approach to nature conservation; we published Policy Futures Series 1, Living Landscapes in 2009.¹⁵ In Policy Future Series 3, Climate Connections¹⁶ made the case of how maintaining ecosystem health is essential in the fight against climate change and in maintaining our economy, prosperity and well-being.

We are demonstrating by our partnership working, how the landscape scale approach to nature conservation delivers multiple benefits through our Coigach Assynt Living Landscapes (CALL) and Cumbernauld Living Landscape projects.

The CALL project is developing a (native) tree nursery at Little Assynt to deliver planting stock for new woodlands. The project is also in the early stages of piloting the reseedling of one established planted native woodland with typical ground flora.

The Cumbernauld Living Landscapes project is developing a long term forest plan to restore, recreate and reconnect wildlife habitat and improve water quality across the Trusts' woodlands and other holdings.

6 Marine and coastal

We recognise that many of the outcome and a number of the key steps are already reflected in the Scotland's Marine Nature Conservation Strategy which seeks to integrate conservation and other marine activities in pursuing a vision for 'clean healthy, safe, productive and biologically diverse oceans and seas'.

Nevertheless it is valuable to reiterate the key areas of work which are ongoing towards the protection and recovery of Scotland's marine environment through the Scottish Government's 3 pillar approach to marine nature conservation, including through marine planning and other wider seas measures such as fisheries management. In doing so, care should be taken to retain consistency with the terms and commitments of the strategies, statutory measures and parliamentary statements that underpin the approach,

There is much to applaud in the Marine Nature Conservation Strategy and the commitments and powers set out under the Marine (Scotland) Act. However we remain concerned by delays to critical elements of the 3 pillar approach. We are therefore concerned that the impression given by chapter 6 is that all is in hand under existing programmes and projects and there is little more that public bodies can do beyond that. A great deal of work is needed to promote the benefits of a healthy marine environment and we feel this is particularly lacking with respect to Marine Protected Areas. Furthermore, there is danger that an opportunity to clearly communicate how those public bodies perhaps not yet fully engaged should contribute to or benefit from the achievement of the stated outcomes is missed.

It is critically important that once designated, MPAs forming part of the network must be effectively managed so as to deliver long-term protection to the features they contain, allowing the ecosystem

¹⁴ See SWT's policy on ancient woodland:http://scottishwildlifetrust.org.uk/docs/002_057_publications_policies_Policy_on_forestry_and_woodland_June_2012_1339581872.pdf

¹⁵ See http://scottishwildlifetrust.org.uk/docs/002_050_publications_Policy_Futures_Series_1_Living_Landscapes_1292841506.pdf

¹⁶ See: http://scottishwildlifetrust.org.uk/docs/027_104_publications_Climate_Connections_final_low_res_1306398243.pdf

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services that flow from them to continue. The commitment to an ecologically coherent network of MPAs that are effectively managed is clearly set out in the Ministerial Statement on the creation of a network of Marine Protected Areas.¹⁷ We would therefore expect the 2020 challenge to reflect this and would welcome the amendment of a key step to look beyond designation and “establish an ecologically coherent network of well-managed Marine Protected Areas promoting sustainable use and conservation”.

More could be made of the importance of the adoption of marine spatial planning through a National Marine Plan. More than aiding “balanced decision-making”, marine planning is critical in ensuring sustainable use, supporting the objectives of the MPA network and the achievement and maintenance of Good Environmental Status. Also, the key steps refer to a “Scottish Marine Plan” whereas elsewhere the reference is to the “National Marine Plan” which we understand to be the adopted term – regardless of which it is, we would welcome consistency in the document.

The key steps should recognise that the achievement (and maintenance) of Good Environmental Status for Scottish seas is fundamentally linked to the adoption of MPAs, marine planning and wider seas measures. Therefore it would be beneficial to explicitly link this with reference to the 3 pillar approach to marine nature conservation. Furthermore, it should be recognised that the achievement and maintenance of Good Ecological Status under the Water Framework Directive applies to our coastal waters out to one mile from low-water. The inclusion of a key step here, consistent with the key step included in chapter 5, would highlight the importance of the integrated management Scotland's river catchments to the quality of Scotland's coastal waters.

The removal of species and damage to marine habitats through fishing remains a significant pressure on marine biodiversity in Scotland's seas. It is therefore disappointing that the key steps do not reflect the urgent need to achieve a truly sustainable fishing industry in all its forms. It is well established that to have a viable and thriving fishing sector, the size of fish stocks must be above levels where they can produce the maximum sustainable yield. We call for the key step to be amended to explicitly state the need to bring CFP stocks to a level *exceeding* that which would produce Maximum Sustainable Yield. Further, more that “take account of” we would like to see inshore fisheries management underpinned by the protection and enhancement of biodiversity.

While coastal and shallow waters are highlighted for their role in engaging people with the natural environment we believe that more could be achieved in this regard through the developing Marine Protected Area network. The 2020 challenge should for example recognise that a key step to achieving Scotland's vision is the delivery of a comprehensive programme of awareness raising and education through on-site interpretation and guidance for marine users and those who derive financial or cultural value from the sea, such that the social and economic benefits of Marine Protected Areas and improved marine biodiversity can be made real.

Scottish Wildlife Trust's work

The relationship between local people and the sea was at the centre of a partnership project in Ullapool, Wester Ross, North West Scotland. The Scottish Wildlife Trust and the Ullapool Tourism and Business Association brought the richness of local marine wildlife ‘up to the surface’, raising awareness of local marine biodiversity and the vital links between the local economy and the sea.

We received support from Wester Ross Environment Network (WREN) and local schools, as well as marine user groups including fish farmers and marine tourism operators. 25 outdoor banners were produced, 20 of them depicting colourful photographs of local marine habitats alongside images of the marine industries they support. The Scottish Wildlife Trust marine officer also took on an underwater camera operator and an artist to work with five local schools to create five banners of marine-inspired artwork. The finished banners show the relationship between people and marine wildlife. The 25 large banners and two smaller sets of mobile ones have been on display in Ullapool and surrounding villages since the summer of 2009.

¹⁷ <http://www.scotland.gov.uk/Resource/Doc/295194/0096931.pdf>

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7 Measuring progress

It is laudable that the 2020 Challenge wants to measure progress, which is in line with Strategic Goal E, and we appreciate that finding a suit of indicators to measure ecosystem health is by no means an easy task. We are encouraged by the active management approach; we also believe that indicators should not be chosen purely because the data is already being collected.

The indicators must measure the health of an ecosystem, be it by a proxy measure or the presence of species richness or keystone species. Data should be able to be disseminated at a catchment scale and/or local authority level and be presented in such a way that it is easy to interpret by the public (e.g dashboard style).

We have noted what is proposed in Table 2 and we would also suggest the following indicators for consideration:

- (C) a measure soil quality (including peatland)
- (B) total area of farmland using pesticides/insecticides/fungicides
- (A) no. of school lessons conducted in outdoor setting (excluding PE)
- (C) changes in insect pollinators
- (B) Proportion of local biodiversity sites under active management
- (B) No of red deer/roe deer/Sika etc

With regard to keystone species, the Scottish Wildlife Trust has already developed a suit of keystone/ ecosystem health indicator species/

The Scottish Wildlife Trust would be happy to clarify any of our points made if requested.

Yours faithfully,



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