

24th July 2018

Scottish Wildlife Trust Consultation Response:

National Council of Rural Advisers - 'A Rural Conversation: Together We Can, Together We Will'



Overview

The Scottish Wildlife Trust welcomes the opportunity to respond to this important consultation. In summary, we believe there are a number of key issues which need to be addressed in order for the document to fulfil its stated aim of presenting “an ambitious narrative about the rural economy of Scotland”. In particular:

- There is a lack of crossover between this document and the proposals for an Environment Strategy for Scotland. This appears contrary to the Scottish Government's commitment to ensure policymaking is consistently informed and underpinned by environmental considerations.
- The Trust does not feel that this document furthers the Scottish Government's ambitions to meet the UN Sustainable Development Goals. The Trust believes this ambition should be a common theme throughout Scottish Government policy.
- The acknowledgement of the need to 'redefine growth' is important as this is crucial to sustainable development. The Trust would welcome further consultation and discussion on this issue.
- The document does not consider environmental limits, services, and opportunities, which is a factor that could significantly limit the deliverability of any rural economic strategy. Healthy ecosystems are fundamental to economic activity, which is even more recognisable in a rural context where services such as good soil health, water quality and flood mitigation are essential for rural businesses, from agriculture to tourism. The definition of natural capital accounting within the document also needs to be made more precise.
- The Scottish Wildlife Trust's Land Stewardship Policy¹ offers a costed approach to tackling land management in a post-Brexit environment. This is offered as a blueprint for government policymaking, which makes healthy ecosystems central to our thinking about any economic policy. The Trust believe it is necessary to reinvigorate

¹ Edwards, T., Hughes, J., Keegan, M., Pike, J., & Wilson, B. (2017) *Land Stewardship: A Blueprint for Government Policy*, Scottish Wildlife Trust, Edinburgh, available via: <https://scottishwildlifetrust.org.uk/our-work/our-advocacy/policies-and-positions/land-stewardship-policy/land-stewardship-policy-full/>

rural economies and business through investing directly in our stocks of natural capital and reaping the multiple benefits that this will provide Scotland wide.

Questions

1. The development of relevant Scottish Government mainstream policies should consider the effect upon the Rural Economic Strategy and its consequent policies.

How should policy makers in Government make sure that the economic needs of rural Scotland are taken into account?

The Rural Economic Strategy must be set in the context of a Land Use Strategy, National Ecological Network and Biodiversity Strategy. The Trust feels there is a disappointing lack of crossover between the Rural Conversation document and the "Developing an Environment Strategy for Scotland"² document. The Trust is also disappointed that the Land Use Strategy is not mentioned in the Rural Conversation document.

The Scottish Government's Land Use Strategy was designed to balance competing land use interests across Scotland, and the priorities of different stakeholders to promote a sustainable, ecosystems-based approach to solving problems and conflicting ideas. As such, this would be the perfect lens through which to view the "Rural Conversation". Without this approach Scotland will not meet international legally-binding biodiversity targets, such as the 2020 Aichi Targets for biodiversity (Scotland is off-target in three out of five points on the UN progress scale)³, or our obligations under the Sustainable Development Goals.

We welcome the commitment to challenging 'current thinking on how economic growth is measured in rural contexts'. The identified aim of 'redefining rural growth' that came out of the community workshops suggests rural communities have not benefited from business-as-usual approaches. Whilst vague, it provides a starting point for thinking about how we (re)define economic growth – moving away from narrow concentrations on GVA (and how this contributes to GDP) which can contribute to unsustainable development, and factoring in more inclusive metrics that account for a wider set of social, environmental, and cultural contributions. This includes an emphasis on qualitative rather than quantitative growth, and rather than simply measuring basic economic activity, we account for the wider positive and negative impacts of this activity.

² Scottish Government (2018) Consultation Document: Developing an Environment Strategy for Scotland, [online] available at: <https://consult.gov.scot/environment-forestry/environment-strategy/>

³ Scottish Natural Heritage (2017) Scotland's Biodiversity Progress to 2020 Aichi Targets: Interim Report 2017, [online] available at: <https://www.nature.scot/sites/default/files/2018-05/Aichi%20Report%20Interim%202017.pdf>

The discussion document mentions natural capital accounting as a means of recognising the value of environmental impacts – but the definition given is potentially misleading. Natural capital accounting is not designed to capture the 'flow of natural resource[s]'. This implies the natural resource's value is captured only when it moves from one state of capital to another, for example, trees become timber (natural resource becomes human-made capital). Natural capital accounting is intended to capture the value of natural assets as a stock – in the same example, trees are recognised for their ecosystem services (biodiversity, wildlife, carbon storage, natural flood management, landscape aesthetics, etc), and this is accounted for economically. Flows are part of natural capital accounting similar to the way that services in an economy are flows: there's not necessarily a transfer of physical material. This is the basis of ecosystem services, such as biodiversity.

In a national accounting perspective, natural capital accounts are a series of interconnected accounts that provide a structured set of information relating to the stocks of natural capital and flows of services supplied by them. Since it is the ecosystem as a whole that provides the services, the accounting system treats the ecosystem as the asset, rather than the constituent parts.⁴

Given that the need for 'protecting and enhancing our stock of natural capital...is fundamental to a healthy and resilient economy' (First Minister Nicola Sturgeon, 2015⁵), our stocks of natural capital, their condition, protection, and regeneration, are essential in any rural economy accounting. Policy makers need to factor in the ecosystem services provided by such stocks as fundamental, recognising that economic development needs to occur within environmental limits in order to be sustainable, and thus feasible in the longer term.

Policymakers in government should make use of existing mechanisms and knowledge resources in the delivery of this. The Natural Capital Asset Index (NCAI)⁶, as the 'basis of our quality of life' and what 'underpins our economy'⁷, is an essential tool for recognising the benefits that flow to local communities and disperse internationally from Scotland's (terrestrial) environmental resources. A new rural economic strategy must be informed by existing commitments to protect and restore integral natural resources. Scotland is committed to meeting the Sustainable Development Goals, pledging Scotland to consider all 17 Goals in public policy. The Trust therefore emphasises how essential it is to deliver on these commitments throughout the

⁴ See, for example, Office for National Statistics (2017) Principles of Natural Capital Accounting [online] available at:

<https://www.ons.gov.uk/economy/environmentalaccounts/methodologies/principlesofnaturalcapitalaccounting#the-scope-of-natural-capital-accounts-for-the-uk>

⁵ First Minister Nicola Sturgeon MSP (2015), speech to World Forum on Natural Capital, [online] available at: www.naturalcapitalforum.com/news/article/plenary-speech-by-nicola-sturgeon

⁶ For more information see SNH (<https://www.nature.scot/professional-advice/planning-and-development/valuing-our-environment/natural-capital-asset-index>) and Scottish Government outlines (<https://www.gov.scot/About/Performance/scotPerforms/indicator/naturalcapital>)

⁷ *Ibid.*

planning, consultation, and policy process. These can only be delivered with joined-up thinking.

Should there be an ability to call to account Scottish Government and their Agencies to ensure collaboration and actions to meet the objectives of the Rural Economic Strategy?

Yes. The Trust is supportive of this particularly around the definitions of 'redefining growth' in the Rural Economic Strategy. Importantly, any group or organisation – not just those considered 'rural interest groups' – should be involved.

2. Create quality job opportunities (that are well paid, flexible, and purposeful) to promote skills and opportunities, but also deal with inequalities in the rural labour market (such as the gender pay gap).

What employment opportunities do we need to meet the current and future needs of our changing rural economy? Where should these be? (either by location and/or sector)

The Scottish Government needs to make multidisciplinary land use the norm and this must be encouraged through education and redesign of land management subsidy. This includes moving away from simple categories of rural enterprise, such as farmer, forester, gamekeeper, etc., and towards recognising land managers that reflect the complexity and crossover necessary for sustainably producing multiple goods and services from our land. The Trust's Land Stewardship Policy is a costed blueprint for government policy. It shows how land management should be supported in Scotland after the UK leaves the Common Agricultural Policy (CAP) in a way that safeguards wildlife and provides a high-quality natural environment, while also supporting the rural economy.⁸

The vision for a becoming a 'good food nation' should be incorporated in any rural economic strategy. The Scottish Government's 2014 Discussion Document highlighted that 'There is a burgeoning interest in local food. Local food initiatives are thriving the length and breadth of the country'.⁹ The current food system contributes to food insecurity, low wages, and insecure working conditions for workers, whilst food producers often struggle to make ends meet. The Cabinet Secretary for Rural Economy this year said:

Our plans for Scotland to become a good food nation are continuing. The Scottish Food Commission recently submitted its recommendations for the

⁸ Scottish Wildlife Trust (2018) 'Land Stewardship Policy' [online], available at:

<https://scottishwildlifetrust.org.uk/our-work/our-advocacy/policies-and-positions/land-stewardship-policy/>

⁹ Scottish Government (2014) 'Becoming a Good Food Nation: Discussion Document' [online], available at:

<https://beta.gov.scot/publications/recipe-success-scotlands-national-food-drink-policy-becoming-good-food/documents/00453219.pdf>

proposed good food nation bill, and they are currently being considered across the Scottish Government with a view to a consultation being held this year. The consultation will inform the content of a good food nation bill that will be introduced during this parliamentary session¹⁰.

The Trust therefore believes it is essential for the good food nation vision to be incorporated into any rural economic strategy for supporting quality, secure employment with clear environmental priorities.

The rural development strategy needs to work within the broader goal of establishing a circular economy, outlined by the Scottish Government in 2016¹¹, for job creation. This would promote the benefits of, for example, re-manufacturing jobs which are alone estimated to contribute 5,700 new jobs and £620 million in turnover¹². In the rural economy, 'the beer, whisky and fish industries could reduce costs by £500-800 million a year by taking a more circular approach'¹³. At the same time, the rural economy strategy must recognise the central role natural capital provides in job creation and support; supporting over 60,000 jobs in 2016¹⁴. Scotland's renewable energy sector is a clear example of the job-creation potential in "green collar" industries. The protection and enhancement of natural capital stocks, already recognised by the Scottish Government, must therefore be the basis for future rural development strategies and subsidy, including in identifying the ecological and environmental management skills and advisory services needed.

The report similarly fails to acknowledge the role of environmental enterprise as a distinct category. For example, Scottish Enterprise has already acknowledged the importance of new techniques in identifying pests and diseases and collecting yield data from fields – reducing the amount of fertiliser and water required, and helping farmers be more precise¹⁵. The benefits of recognising existing strategies, including the circular economy and natural capital assets, include reduced costs, improved efficiency and new and innovative income streams¹⁶, helping to ensure greater resilience and sustainability in development strategies.

¹⁰ Fergus Ewing MSP (2018) Parliamentary Debate 25th January 2018, available online: <https://www.theyworkforyou.com/sp/?id=2018-01-25.2.0>

¹¹ Scottish Government (2016) 'Making Things Last: A Circular Economy Strategy for Scotland' available at: <http://www.gov.scot/Resource/0049/00494471.pdf>

¹² *Ibid.*: 1

¹³ Ellen Macarthur Foundation (n.d.) 'Scotland: Making Things Last - A Circular Economy Strategy' [online] available at: <https://www.ellenmacarthurfoundation.org/case-studies/scotland-making-things-last-a-circular-economy-strategy>

¹⁴ Scottish Forum on Natural Capital (2016) '2016 in review' [online], available at: <http://naturalcapitalscotland.com/article/2016-in-review/>

¹⁵ Scottish Enterprise (2017) 'Clean Scotland: a bonnie food and drink waste revolution' [online], available at: <https://www.scottish-enterprise.com/knowledge-hub/articles/insight/clean-scotland-a-bonnie-food-and-drink-waste-revolution>.

¹⁶ Scottish Enterprise (2017) 'How your business could benefit from Scotland's circular economy' [online], available at: <https://www.scottish-enterprise.com/knowledge-hub/articles/insight/circular-economy>

Future employment opportunities need to derive from good environmental management, and from a CAP replacement that rewards delivery of a diverse range of ecosystem services. For example, employment rates have been negatively affected by the current incentivising of so-called cash crops that require less labour intensity and more easily benefit from greater mechanisation, versus, for example, fruit and vegetables that require hand picking¹⁷. Rewarding ecosystem services provision rather than just commodity production per se would help tackle the entrenched disadvantages of the CAP.

As Scotland is committed to meeting the Sustainable Development Goals¹⁸, the Goals of No Poverty (1), Gender Equality (5), Decent Work (8), Reduced Inequalities (10) and Responsible Consumption and Production (12), are central to tackling inequality and must be central to any rural development plan tackling inequality in a sustainable manner.

How do we tackle the inequalities we face in rural Scotland? i.e. challenges faced due to age, gender, socio-economic, educational and ethnic background

No answer

3. Build on existing work to gather evidence and data to measure the true value of the rural economy and monitor its growth.

Going beyond the economic contribution of rural businesses, what positive examples of social (i.e. community cohesion), cultural (i.e. protection of heritage and traditions) and environmental (i.e. carbon reducing) impacts of rural businesses can you think of?

*Accounting for wider impacts needs to acknowledge both positives **and** negatives for accurate accounting. Rural businesses can contribute to dispersed public benefits through ecosystem services: biodiversity, carbon storage, water quality, air quality, landscape aesthetics, recreation, access to nature (including physical and mental health benefits deriving from this), among others. However, this requires active management; protections, regulations, and incentives for public goods provision. Economic markets do not capture public goods, which then exist as a positive externality, and separate mechanisms are necessary to account and provide for these. At the same time, negative externalities, those impacts of rural businesses that have negative environmental, social, and cultural impacts which are not captured by the market and thus reflected in the final price of a private/consumer good, must be accounted for. This is particularly important for rural businesses that rely on common goods (like those listed above), whereby the benefits of unsustainable practices (e.g.*

¹⁷ Alexiadis, S., Ladias, C., Hasanagas, N. (2013). 'A regional perspective of the Common Agricultural Policy', *Land Use Policy*, 30 (1): 665-669

¹⁸ United Nations (2015) Sustainable Development Goals [online], available at: <https://sustainabledevelopment.un.org/?menu=1300>

profit) accrue to individual businesses, while the negative impacts disperse across society (e.g. depleted carbon stores, air quality, biodiversity, etc.).

What specific outcomes of rural businesses should be measured and why?

Positive and negative market externalities as they relate to ecosystem services. Rural businesses rely on quality ecosystem services; clean water and air, soil functionality, natural flood management, etc. Beyond these immediate needs, the unique and diverse qualities of Scotland's rural environments are central to personal and business identity, and tourism. At a more dispersed level, the carbon storage potential of particularly peatlands, but also other carbon-rich soils and vegetation, is essential to helping Scotland meet GHG emissions commitments, as recently outlined in the 2018 Climate Change Plan, Third Report¹⁹. Greater measurement and accounting of positive and negative externalities is therefore essential in recognising the long-term value of rural businesses. Any development strategy must take account of the wider ecosystem upon which the economic development will rely, and upon which the development will impact, whether positively or negatively. Because of this, 'growth' needs to be rearticulated to take account of qualitative improvements in those areas that matter most to communities, rather than simply exponential, quantitative growth in GVA or, more broadly, GDP terms.

Using the Natural Capital Asset Index, Scotland's natural capital is valued at more than £20 billion, and underpins all economic activity through the provision of local and dispersed ecosystem services. How businesses positively and/or negatively affect this is rarely captured by market mechanisms, especially, by definition, in the case of environmental public goods. Rural economies are intrinsically and complexly linked to the provision of ecosystem services, and their accounting is therefore essential in recognising the true value, positive or negative, of rural business.

More generally, rural business should not be considered as a homogenous agricultural enterprise. Rural business should be every bit as diversified as urban business and to draw unnecessary divisions in Scotland is counterproductive.

In the context of land-management enterprises, The Trust's Land Stewardship Policy advocates a whole farm/enterprise review in which a well-resourced advisory service helps set social, economic and environmental objectives for each business – these would be informed by regional priorities as identified by the Land Use Strategy and National Ecological Network.

¹⁹ Scottish Government (2018) Climate Change Plan: The Third Report on Proposals and Policies 2018-2032, [online] accessed via: <http://www.gov.scot/Resource/0053/00532096.pdf> [accessed 4/7/2018].

4. Encourage future entrepreneurship by ensuring the Scottish Government's rural skills action plan meets the needs of the Rural Economic Strategy.

What skills are required to have a vibrant rural economy?

To help meet environmental, climate and renewable energy targets greater ecological knowledge is essential. The protection and enhancement of natural capital stocks, already recognised by the Scottish Government, should be acknowledged in a future rural economic strategy, including in identifying the ecological and environmental management skills needed. For example, the Trust is aware of a huge demand for ecological survey skills from developers in renewable and other industries.

The strategy must put environmental entrepreneurship and innovations central in job creation strategies. Entrepreneurial skills have increasingly been harnessed for the benefit, rather than to the detriment, of good environmental management and conservation. Rural areas provide spaces of innovation. The rural economic strategy, therefore, needs to concentrate on harnessing and supporting his essential sector. Rural businesses and agriculture have already been the sites of innovations that contribute to environmental protection goals²⁰. They therefore represent sites for attracting continued innovation and diversified revenue streams.

How do we best ensure that people of all ages, genders, areas, socio-economic, educational and ethnic backgrounds receive appropriate support?

No answer

5. Develop opportunities for the businesses of urban and rural Scotland to share ideas and work together.

How do you think we could do this? (for example, through schools or membership organisation groups)

Facilitating learning/sharing between urban and rural areas to improve and have a better understanding of the opportunities that are available would be new for Scotland. What would interest you in this approach? Are there any benefits/drawbacks?

In the area of environmental entrepreneurship, there are clear areas of potential knowledge transfer between urban and rural areas. Rural areas represent important spaces of innovation, where new methods can be applied to environmental problems, as in those examples identified above, whilst urban areas benefit from higher numbers of HE students and young entrepreneurs. Supporting knowledge transfer, environmental management skills, and ecological skills goes hand-in-hand with government strategy for a circular economy and natural capital accounting. Emergent sectors, such as re-manufacturing, offer enormous growth potential whilst

²⁰ *Ibid.* at 7 and 8.

contributing to the delivery of environmental goals, and functioning within environmental limits. The Trust believes new financial innovations should be explored for the delivery of environmental public goods and other ecosystem services, requiring diverse networks across urban and rural areas for knowledge transfer.

Encouraging school exchanges, such as the Ullapool/Sunnyside Primary exchange facilitated by the Scottish Wildlife Trust's Living Seas programme, exposes young children, across different demographics, to new and varied experiences. This sort of approach should be mirrored throughout the education system. Opportunities should focus on deconstructing the rural/urban divide, rather than contributing to it.

More broadly, the Trust believes that Government and civil society across rural and urban Scotland should work in partnership to develop mechanisms for valuing ecosystem goods and services in a way that will facilitate their sustainable use. To this end, the Trust supports efforts by, for example, Scottish Natural Heritage, to further understand and develop economic tools for valuing and protecting natural capital. However, biodiversity has intrinsic value and the Trust believes there is a clear moral justification for its conservation on these grounds alone, regardless of whether biodiversity also has benefits in terms of ecosystem services provision.

6. Create communities of interest (digital, physical) where businesses and people can come together to solve problems, share ideas and understand opportunities.

Is there any place that you can think of in your community where people already do this?
Can you please tell us about it?

The conservation sector – a large rural employer in many areas of Scotland – is experienced at this and draws on knowledge communities from around the world through both digital and physical networks. This makes it all the more surprising that the conservation sector is completely absent from the NCRA group.

What might be the benefits of this approach?

Recognising environmental problems as spaces of potential innovation requires information and knowledge exchange – this is essential for delivering environmental entrepreneurship that may help solve environmental and social problems.

What things would your local community need to help people in your local area come together?

Well-resourced advisory service reflecting the importance of sustainable land management, and improvements in telecommunications / broadband.

7. Help ensure there are the same opportunities and access to services between urban and rural areas.

For people living and working in rural areas there are often big differences compared to urban areas in what services might be available (things like broadband, childcare, transport, community development etc.) What do you need to enable you to choose to live and work in rural Scotland?

There are obvious 'services' that are helpful to sustaining a productive rural society and economy (such as public transport or broadband), however, it should be kept in mind that access to good quality ecosystem services is absolutely vital for a thriving rural (and urban) economy. Healthy ecosystems, and the services they provide, are the foundation for our economic activity and they must be invested in just like other services.

8. Make sure Government policies, regulations, planning and support mechanisms help local businesses.

What types of policies, regulations, planning and business support need to be strengthened or removed to help a wide variety of small and micro businesses in rural areas?

Can you think of any problems in transport, housing, social care and digital infrastructure that prevent economic growth for your industry sector, business or community?

A properly resourced and implemented Land Use Strategy is vital to help balance the needs of business, communities and the environment. The Scottish Government must make this a priority, especially as we exit the EU and with inevitable changes to rural funding. The Land Use Strategy was intended to shape and inform all future government policymaking to ensure a consistent, ecosystems-based approach to land management.

The report has identified that 'redefining growth' is central to a new rural vision – without further engagement and consultation work to qualify exactly what 'growth' ought to mean, it could be considered disingenuous to maintain 'growth' as a policy goal in the interim. Growth needs to be measured in a way captures what matters most to people and communities. If we only measure GDP, we're blind to growth that damages ecosystems, as well as the actions that replenish them. In any event, 'growth' as a policy objective is vague – if this is measured purely in terms of gross value added (GVA), essential ecosystem services on which businesses rely are occluded from valuation. The Trust believes that 'growth' should be redefined so that human and environmental needs and wellbeing are central. This means, where it can be achieved sustainably, growth contributes towards policy goals, rather than being a goal in itself. For example, supporting the growth of renewable energy sectors, such as the recently announced (23rd June, 2018) subsidies for windfarms off of Scottish islands to remove financial risk, with clear potential for businesses in support services in those rural areas. . In this way, measurable growth would occur when

ecosystems services are protected and enhanced; services that underpin the economy.

9. Make sure that community resources that contribute to our economy (like tourist attractions) also deliver benefits to their communities.

Can you think of any examples of resources in your community e.g. that attract visitors and make money but do not benefit the community?

Are there examples of attractions in your community that you would like to promote? What could help you do this?

The Trust is concerned with a narrow focus on those community resources that make money in the short-term, at the expense of distributed public or club goods.

'Community resources' is ambiguous, but in the example of tourism a number of variables that lie outside of market mechanisms are poorly accounted for. As such, whilst tourism is an essential industry, it can lead to poorer provision of public goods, such as air quality, to local communities, even if economic growth in GVA terms is achieved. Scotland's landscapes and natural areas are fundamental to attracting tourism, and as such their protection and their local community value must be acknowledged in any assessment of the growth potential in tourism to ensure this is sustainable, so that development does not impede on the ability of local communities to enjoy and benefit from the public goods in future generations. Nature-based tourism is worth £1.4 billion a year to the Scottish economy²²; more than the GVA of agriculture, fishing, and forestry combined. As such, it's essential that, much like how agriculture and fishing are recognised for their contributions to the food and drink sector, contributing environmental factors are acknowledged, protected, and enhanced.

The Trust also suggests that establishing a National Ecological Network furthers the delivery of public goods to local communities, whilst enhancing those qualities of rural areas that attract tourists. This includes benefits to wildlife, biodiversity, pollination, landscape aesthetics, and the promotion of native flora. More directly, the NEN would improve resilience to environmental change, whilst increasing opportunities for tourism, recreational access, walking, and cycling²³.

Communities need to be sustainable, and we need to think in intergenerational terms – future communities can't be left worse off because of short-sighted priorities taken now. Scotland is committed to the Sustainable Development Goals, and ensuring future generations benefit from at least the same quality of assets as we currently enjoy.

²² Scotland Natural Heritage, cited in: Edwards, T., Hughes, J., Keegan, M., Pike, J., & Wilson, B. (2017) *Land Stewardship: A Blueprint for Government Policy*, Scottish Wildlife Trust, Edinburgh, p. 11.

²³ Edwards, T., Hughes, J., Keegan, M., Pike, J., & Wilson, B. (2017)

Land Stewardship: A Blueprint for Government Policy, Scottish Wildlife Trust, Edinburgh, p. 26

10. Please tell us below if there are any key issues you believe we may have missed.

The Trust is especially concerned with the almost total failure to acknowledge environmental pressures, limits, opportunities, and services in the NCRA report. There seems to have been no recognition of broader governmental priorities – these are outlined much more clearly in the Scottish Government's current consultation paper on the Environment Strategy. The Land Use Policy, and other related governmental commitments, were designed to ensure joined-up thinking with regards rural planning, and to ensure competing land use visions were reconciled consistently, with our mutual reliance on the environment central to this.

Ultimately, a rural development strategy in the 21st century isn't fit for purpose unless it is sustainable; unless it acknowledges and adjusts to environmental limits in order to guarantee future generations the same opportunities. As importantly, acknowledging the centrality of ecosystems in the delivery of cornerstones of the rural economy, such as tourism, fishing, and agriculture, not only draws attention to the resilience of these sectors to environmental change, but opens new opportunities for rural communities. For example, realising the value of natural capital stocks, both as local ecosystem services such as flood prevention and dispersed benefits like carbon storage, can be combined with new support mechanisms for maximising these potentials, generating more income that contributes positively to socio-environmental problems, rather than worsening them.

The establishment of a National Ecological Network would help deliver public goods to local communities and businesses, whilst enhancing the attraction of Scotland's rural areas to tourism. The Trust believes this should be a part of any future rural economic strategy to decrease the likelihood of extinctions, increase genetic exchange, and improve ecosystem resilience.

The report claims that 'The NCRA takes the view that we must challenge current thinking on how economic growth is measured in rural contexts' (p.3). This is very much welcomed by the Trust. However, several questions are premised on the basis of growing some aspect of the economy, with less regard given to what is being achieved by growing these. There is a concern, therefore, that despite the systemic change hinted at by 'redefining growth', it is reduced instead to empty rhetoric. In this sense, simply growing the economy is privileged as the policy goal, rather than the policy mechanism. Moreover, where growth functions more as a mechanism, as in the important goals of furthering equality, it risks reducing a moral, social, and political set of concerns, already described as such by the Scottish Government, to a purely economic dimension. The Trust believes that accounting for natural capital stock, rather than simply natural resources flow, is fundamental to any rural development strategy. By accounting for positive and negative impacts on ecosystem services, 'growth' is maximised only when these essential ecosystems are restored, avoiding the pitfalls of short-termism.

Protecting Scotland's wildlife for the future

Overall, the Trust is concerned that not only the ecological and climate imperatives of considering the environment are ignored in this report, but also the demonstrable benefits and opportunities are entirely unrealised.