Scottish Wildlife Trust

Response to Scottish Government's *Tackling the Nature Emergency* - consultation on

Scotland's Strategic Framework for Biodiversity

Scottish Wildlife Trust

14th December 2023

The Scottish Wildlife Trust believes that, with a robust enabling framework, all the measures currently under consultation could pave the way to effectively address both the nature and climate crises—a challenge that, as evidenced, we have so far failed to address.

The Scottish Wildlife Trust welcomes this opportunity to respond to Scottish Government's consultation on Scotland's Strategic Framework for Biodiversity, titled Tackling the nature emergency.

Contents

Section 1 – Scottish Biodiversity Strategy

Scottish Government are not seeking further views on the final draft of the strategy document.

Section 2 - Scottish Biodiversity Strategy Delivery Plan

Accelerate restoration and regeneration

Question 2a: Have we captured the key actions needed to deliver the objective: accelerate restoration and regeneration?

Unsure

The Scottish Wildlife Trust welcomes the actions proposed for the objective of accelerating restoration and regeneration. However, we are concerned that these actions are mostly not "SMART". There is overreliance on broad general terms like "support", "investigate" etc… these words are open ended and hard to benchmark. We suggest all actions are given a "SMART" treatment. The deer actions stand out as the best example of SMART targets and we welcome those and would like to see this replicated. As a general comment for the whole Delivery Plan, a design process to set the targets out within a specific, consistent SMART style would be very useful for example:

"We will do xxx, using xx and xx as metrics, by [date]"

When discussing this with colleagues we have often found ourselves trying to work out if the total of the actions listed will achieve the desired 2030 targets, it doesn't look like this exercise has been done and it doesn't look like what has been presented will achieve the paradigm shift needed.

Much of what we see in the here is simply rested from previous plans or commitments, we need to see more clearly is new and driving the change. A good example being previous commitments to ban the sale of peat in Scotland.

Statutory Nature Restoration Targets

We fully support the setting of statutory nature targets. Target setting will be vital to the success of mainstreaming this strategy and galvanising action. Government must be charged with delivery of meaningful, legally binding biodiversity targets which will be brought forward by the Natural Environment Bill. The current timetable for this Bill and the subsequent nature targets is too slow and could mean we do not have targets in place until the latter stages of this decade when it will be too late for Scotland to make an adequate contribution in the Decade on Ecosystem Restoration and to meet our own targets for 2030.

Targets are essential for driving change across all parts of Government and the economy. Whilst we know much more needs to be done to tackle the climate emergency, we have seen how the Net Zero targets have led to climate change being mainstreamed into the consciousness of governments and sectors and seen as a priority. Without a similar approach for nature, we run the risk of a fragmented and insufficient, rather than unified and effective, response to the nature emergency.

The delivery plan should set the path for the targets included in the Natural Environment Bill. This action must have full coherence with the Natural Environment Bill.

Please see Scottish Environment LINK report on nature recovery targets and how the Natural Environment (Scotland) Bill might be drafted to introduce such targets on a statutory basis[i].

Introduce a Programme of Ecosystem Restoration

We are broadly supportive of the actions laid out under this priority action. We have highlighted specific actions we wish to comment upon further.

The action "*Identify and facilitate partnership projects for six large scale landscape restoration areas with significant woodland components by 2025 and establish management structures with restoration work progressing by 2030*." Particularly stood out as interesting with a lot of possibilities attached to it.

Whilst acknowledging that to some extent "the vehicle will have to be built whilst we are traveling" we and other delivery providers across Scotland will quickly have to understand more about the Governments thinking here and be given greater detail on this proposal. The Trust would welcome the opportunity to engage further with Government on this and if a working group is created we would like to register interest in being part of that.

We would imagine that an area where it is possible to carry out deer management with the objective of bringing deer numbers down to levels which would allow regeneration would be a primary driver for selecting one of these "restoration areas". We would also theorise that an area larger than 10,000 hectares where land managers already work in partnership on landscape scale issues would be desirable.

We would like to suggest the Coigach & Assynt Living Landscape (CALL) project area as an ideal location for one of the restoration areas[ii]. The outline project area can be viewed here[iii]. CALL is one of the larger landscape-scale restoration projects in Europe, covering 635 square kilometres, included within a 40-year vision. The project area is of the most recognisable landscapes in Scotland and contains some of the rarest and most endangered habitats we have.

This evolving project was conceived in 2009 by The Scottish Wildlife Trust and is underpinned by the concept of the ecosystem approach[iv]. CALL tries to take nature conservation out of a silo and make it a much stronger element of socio-economic decision making, with far greater involvement with and benefit for the local communities that live and work in this incredible landscape.

The Coigach & Assynt Living Landscape Partnership Scheme (CALLP) was a five-year National Lottery Heritage Funded project comprising 14 Partner organisations, of which the Scottish Wildlife Trust was the lead partner. CALLP was a mechanism for delivering outputs of the CALL 40-year vision:

"*It is 2050. The communities of Coigach and Assynt are working together to achieve a truly living landscape through: improved understanding of and connection with their environment; functional ecosystems which can mitigate and adapt to the impacts of the climate and biodiversity crises; nature-based local employment and training opportunities; and recognition of communities' strong cultural heritage linked to the land*".

CALLP included a specific project on sustainable deer management[v]. Amongst other activities 18 local people were given deer management training, achieving the recognised qualification DSC Level 1 (Deer Stalking Certificate); three people completed the Sustainable Deer Management module with University of Highlands and Islands, and Five people attended a venison butchery workshop.

The latest project that the CALL partners have progressed is a development phase Nature Recovery Fund bid focussing on assembling the information required to produce woodland restoration and expansion plans across the CALL area. The activities focus on deer management and a thermal drone survey, work and planning for a community deer larder in Coigach and venison route to mark

research. This represents a clear community desire to move forward progressively on deer management issues.

The CALL project area is within the wider NorthWest 2045 / Regional Land Use Pilot area. RLUPs are partnerships designed to facilitate collaboration between local and national government, communities, landowners, land managers, and wider stakeholders. They aim to enable natural capital-led consideration of how to maximise the contribution that our land can make to addressing the twin climate and biodiversity crises. They also aim to help optimise land use in a fair and inclusive way.

The community within the NorthWest2045 RLUP led on the development of a Natural Capital Baseline Assessment of the area, which was partly funded and developed by us. The group found that "*The study produced interesting findings about the distribution of biodiversity and stored carbon within the NW2045 area and helped us understand what it means to 'take a natural capital approach' to land use decision making. The process highlighted the challenges around availability of data, and of communicating about 'natural capital' – something we have worked on in the intervening months. This assessment was a starting point, rather than being comprehensive, and has served as an important step on our natural capital journey*."

Clearly there is appetite to understand more about the natural capital in the region and building upon this the NorthWest2045 Land+ Futures team is exploring a deeply place based approach to proactively engaging with natural capital markets focused on shaping and testing community-led models and this has been funded by FIRNS.

The CALL project area within the NorhtWest2045 zone would be an ideal test bed to look at potential high-integrity private investment in wider deer management within community-led model. This community led model combined with the already established CALL project would tell a powerful story, based on the just transition principles, and would perhaps offer a different approach to some other landscape scale projects in Scotland. Within the CALL project area, we have a coalition of the willing who want to see progress and have a track history of working together.

There is interest and engagement from the CALL partners in the Riverwoods Initiative. The CALL land managers met with the Laxford Project which is taking a landscape scale restoration approach to the River Laxford catchment on the Reay Forest Estate (to the north of CALL within the NorthWest 2045 geography) in partnership with the Atlantic Salmon Trust. Other projects bordering the CALL area are being developed. The "River Loanan Riparian Regeneration Project" is a joint initiative between the Inver and Kirkaig Fishings (private ownership) and the Assynt Foundation (Community Owned Land and CALL Partner). These projects and the woodland restoration and expansion ambition the CALL landowning partners have will improve the riparian cover in a priority area[vi] .

To enable landscape restoration in the CALL and wider NorthWest2045 area we think there is a case for urgently investigating the provision of sustainable high-quality housing. Alongside other partner organisations including NatureScot, we are well accustomed to the difficulty staff experience finding affordable accommodation in rural Scotland and specifically the Northwest, this is a blocker to progress.

Finally, the wider NorthWest2045 area has been discussed as a potential site for a Scottish "Transition Lab", where the objective is to bring all stakeholders to the table in an innovative process using behavioural science, enabling shared objectives and action to create systems change. Importantly, the Labs aim to enable resourcing of the outcomes including future funding, funding instruments and potentially also influence policy change. We think this evidence of collaboration

and innovation, particularly on deer and high integrity community led nature finance, makes the CALL area an ideal candidate for inclusion and we would welcome a meeting to discuss this with the Government.

We have already discussed the idea of the CALL area being selected as a "*large scale landscape restoration areas"* with the NorthWest2045 board and their supportive letter is included below:

"*To whom it may concern:*

The NorthWest2045 would like to see serious consideration given to the North West in response to the proposal in the Consultation on Scotland's Strategic Framework for Biodiversity to:

"Identify and facilitate partnership projects for six large scale landscape restoration areas with significant woodland components by 2025 and establish management structures with restoration work progressing by 2030."

The Coigach & Assynt Living Landscape (CALL) area extends to over 60000 Ha. A proposal for collaborative, evidence-based enhanced deer management – with the objective of enabling woodland regeneration - is underway. Landowners of over half the area are directly involved, and the Deer Management Groups are informed and cooperating.

CALL sits within the 'NorthWest2045' area of 284000 Ha. NorthWest2045 (NW2045) was established in 2020 as a proactive response to many cross-sectoral cross-regional challenges. It is a non-hierarchical coalition of organisations based - and highly active - in the Northwest Highlands. NW2045 comprises local development companies/trusts; community groups (eg North West Highlands Geopark); statutory bodies (Scottish Land commission, Highland Council, Highlands & Islands Enterprise; NatureScot) and community, private and environmental non-governmental landowners (eg Assynt Foundation, Wildland Ltd, John Muir Trust).

NW2045 has been implementing one of the 5 Regional Land Use Partnership pilots, and has recently received development phase funding from FIRNS.

NW2045 is fully supportive of the proposal for the CALL area to be one of the six large scale landscape restoration areas.

Please don't hesitate to get in touch if you have any questions or require any further information.

Best wishes,

Frances Gunn.

Chair, NorthWest2045"

The CALL proposal is far from the only area we feel has merit. We also think that the collation of local partners around the Ardtornish Estate in the Rainforest Zone would be an idea area to focus effort on deer management and woodland regeneration. Finally, this should not be just confined to rural areas in the Highlands, urban deer are a huge barrier to conservation goals and there would be merit in looking at the Cumbernauld Living Landscape as a test bed as well.

As part of the proposed Programme for Ecosystem Restoration, the SBS pledges to identify species which require action beyond that focussed on the restoration of their ecosystem. While ensuring sufficient and connected woodland habitat is crucial for red squirrel populations, we believe that, given the threat posed to the species by the invasive non-native grey squirrel, red squirrels should fall into this category. The Saving Scotland's Red Squirrels Project has demonstrated that targeted

grey squirrel control and monitoring in priority areas (where red squirrels are most threatened by greys) is effective and necessary to prevent the extinction of the red squirrel in Scotland.

We also want to see recognition of beavers as key facilitators of ecosystem restoration. Beavers have been reintroduced, but they are still an endangered species here, and continued targeted conservation action will be needed to ensure that the species does not become extinct in Scotland once again. The Programme of Ecosystem Restoration should include an action to support the implementation of Scotland's Beaver Strategy by increasing the number of statutory agency-led translocations to publicly owned sites and enacting policy which facilitates landowner acceptance of beavers (e.g. properly incentivising river buffers and floodplains on prime agricultural land (PAL); increasing investment in NatureScot's Beaver Mitigation Scheme; prioritising research into beavers and migratory fish).

Implement Scottish Plan for INNS surveillance, prevention and control

Landscape-wide efforts to control established INNS should be centrally coordinated, with delivery shared among a variety of landscape partners. INNS control should be embedded in the operations of all organisations that own and manage land, particularly the statutory agencies and local authorities. Species control orders should be used when landowners are found to be sustaining source populations of INNS. INNS surveillance, prevention and control should be central to the management of every landscape element included in the Scottish Strategic Biodiversity Framework (SSBF).

Nature Networks, 30 by 30 protected areas, nature restoration areas, National Parks and National Nature Reserves will all require INNS management strategies to be successful in 'showcasing the best in nature restoration' and 'acting as exemplars of biodiversity protection and recovery'. The emphasis in the Framework on habitat connectivity is highly positive, however, connecting habitats will also enhance the ability of INNS to spread (e.g. native woodland expansion and grey squirrel), making a landscape-wide, coordinated, sustainable, multi-stakeholder approach to INNS management even more crucial.

We would like to see the grey squirrel recognised as a priority INNS and grey squirrel control programmes like Saving Scotland's Red Squirrels[vii] included as part of the proposed 'pipeline' of strategic INNS projects.

We would also suggest that local authorities and biodiversity partnerships with red squirrels as a priority species in their LBAP have a duty to have some involvement in grey squirrel control and/or monitoring on council-owned land.

We encourage Scottish Government to investigate the possibility of bringing grey squirrel control into the remit of deer managers. Scottish Government should consider creating a role of 'Wildlife Management Ranger' in priority areas, e.g. Landscape Restoration Areas, National Parks, NNRs and any other protected areas created as part of 30 by 30, whose species control focus would change depending on the time of year and location.

Greater clarity is needed on what species are considered priority INNS. We suggest developing a regularly reviewed list to prioritise INNS, similar to that of the Species at Risk List, so that resources and effort is appropriately allocated. Regional priority INNS lists, that are regularly reviewed and updated will improve responses to outbreaks and spread. Community education and reporting should be encouraged at a local level. INNS management should be embedded in management of protected areas and landscape restoration areas, including a biosecurity plan.

The rainforest needs clear invasive non-native species eradication strategies including removing Rhododendron ponticum from 134,000ha of the west coast including the 30,000ha of core rainforest sites, a further 24,000ha cleared in a buffer zone around existing woodland areas, and an additional 80,500 ha of other habitat cleared to ensure catchment scale eradication to prevents re-invasion. This can deliver biodiversity benefits and create local jobs as rhododendron control is labour intensive.

Improve Resilience in Coastal and Marine Systems by reducing pressures and increase and safeguard space for coastal habitat change

We would welcome clarity on the action to publish a plan for marine ecosystem restoration by 2025. There is concern that this might involve duplication of effort with the National Marine Plan 4.

We welcome developing a new approach to marine biodiversity monitoring, must be properly resourced and funded.

Predatory mammals pose a significant threat to seabird islands, necessitating a nationwide initiative for the restoration of these islands and the implementation of robust biosecurity measures, including the continuation of the Biosecurity for LIFE initiative[viii]. This stands as a crucial step in effectively addressing and enhancing resilience against Highly Pathogenic Avian Influenza (HPAI). The pressing nature of these actions is underscored by the recent publication of the latest seabird census, which reveals a concerning decline in 70% of the 20 confidently assessed breeding seabird species in Scotland. A comprehensive portfolio of strategic projects targeting Invasive Non-Native Species must incorporate a dedicated biosecurity program for islands. This entails deploying appropriate measures on vessels, including routine and intensive surveillance. Additionally, there is a need for targeted education for key stakeholders, coupled with outreach efforts aimed at both the public and island communities.

The Scottish Wildlife Trust has been at the forefront of new approaches to tackling the threat of predatory mammals on island seabird communities, pioneering rat control methods with RSPB Scotland on Handa Island wildlife reserve. The ongoing efforts of our staff and volunteers continues to support the breeding success of the seabirds, but this is not without great cost. The cost of the traps and the staff time is significant. Rats continually pose a threat to the internationally important breeding seabird colonies on Handa Island and so reliable, long-term funding and support is needed to ensure the threat is minimal.

We would like to see development of Coastal Change Adaptation Plans (CCAPs) as supported by the Scottish Government's Dynamic Coast project in a way that prioritises the use of nature-based solutions. The plans must encourage collaboration between marine authorities, local authorities and SEPA etc on flood risk and coastal management. Beyond the development of the plans, action must be fully supported and taken as soon as possible to protect delicate coastal habitats. Scottish Government must ensure that developments on coastal habitats are not supported except in the most extenuating circumstances. As with the ongoing development case at Coul Links, it is unacceptable and disingenuous to allow such damaging coastal developments while espousing the need for resilient coastal and marine systems by reducing pressures and increase and safeguard space for coastal habitat change.

We want to see a "source to sea" approach for marine litter and pollution recognising that most marine litter originates on land. A joined-up approach across a landscape and seascape scale is needed to safeguard and reduce pressures on coastal and marine systems. The Riverwoods

initiative, that we lead poses a way to focus efforts on riparian habitat restoration and encourage a joined-up approach across river catchments, which would have significant benefits for the level of runoff pollution reaching the marine and coastal environment.

Substantially reduce deer densities across our landscapes in parallel with ensuring sustainable management of grazing by sheep to improve overall ecosystem health.

We are very supportive of the need for robust deer management. The actions included under this priority action are a good example of how actions could be SMART, as they include specific and measurable figures for deer densities that are achievable, realistic and time based.

We do seek clarity on what is meant by priority woodland. From our perspective, we would recommend this covers all ancient woodland and we would count ancient woodland as all woodland present on 1st edition OS. We would also suggest there is prioritisation given to areas of connected woodland, particularly in the riparian zone.

Enhance water and air quality. Undertake water management measures to enhance biodiversity.

Nature based solutions such as riparian planting, re-meandering and beaver translocations should be included as actions under water management measures to enhance biodiversity.

Will River Basin Management Planning include measures to address flooding risk? Rivers need to be reconnected to their floodplains. Farmers must be properly incentivised to take prime agricultural land out of production to allow space for the natural flow of rivers. Support is needed to allow floodplain land to flood and encourage the restoration of the natural flow of rivers and removal of barriers. We would like to see this linked to all four of the proposed new Tiers with concentrate levels of payments for greater ecological and public benefits.

There is work to be done to integrate RBMPs with wider landscape scale planning, particularly RLUPs and Nature Networks.

The specific point on SUDs should be reworded to say "develop a mechanism to promote positive management of rural and urban sustainable drainage systems (SuDS) for biodiversity benefits*, and then legislate for its mandatory use*." There is little use in a mechanism that will not be used.

Ensure Grouse Moor management sustains healthy biodiversity.

A plan for restoring biodiversity on grouse moors is needed within the Code of Practice.

We support the need for legislation and a revision of the Muirburn Code to regulate the use of muirburn, but burning on peatland must only be undertaken in the most exceptional circumstances and once reasoning has been properly scrutinised. Peatlands cover more than 20% of Scotland's land surface – the majority of which is degraded as a result of historic and ongoing land management including prescribed burning[ix]. The further escalating impact of climate change is putting this important habitat at increasing risk. If peat dries out the 1.7 billion of tonnes of carbon currently locked up in Scotland's peatland could be released. Damaged peat bog habitat, such as those that repeatedly suffer from exposure to muirburn and wildfires, are at greater risk of drying out, so to prevent the release of immense tonnes of carbon we need ongoing considerable and focused effort to restore and protect these important habitats. Muirburn is counterproductive to this goal and should only be undertaken in the most limited of circumstances where evidence supports the use of burning as a management practice for societal benefit.

Ultimately it is against the public's interest to burn on peatland. Allowing peatland to be burned will have a cost to society in the release of carbon, reduction in biodiversity and is a risk to the substantial public investment that has already helped restore peatland across Scotland. Rewetting peatland offers a far more sustainable means to manage wildfire risk, while also tackling the climate and biodiversity crises together. There are many good examples of the positive changes seen as a result of rewetting peatland[x].

The main point is that due to the risk of our vital peat reserves; our lack of faith in the grouse shooting industry to look after and prioritise peatland over grouse shooting; the difficulty and resources it would take to effectively enforce the licence; and because keeping so much of our land in state of monoculture stops the development of greater biodiversity: a licence should not be given for muirburn when the reason is as unnecessary as ensuring more grouse can be shot by a few people for sport.

Question 2b: Are the key actions, to support the objective: accelerate restoration and regeneration, sufficient to put Scotland on track to ending the loss of biodiversity by 2030?

No

We are broadly supportive of the actions laid out in this section, but as with the other objectives the actions need to be made SMART and with appropriate detail to direct change to achieve the goal of ending the loss of biodiversity by 2030.

Adequate support, incentives and compliance measures are needed to achieve the actions. Robust monitoring is essential to ensure actions are being achieved and having the desired effect.

Statutory Nature Restoration Targets

The SBS delivery plan should act as a transition phase to the implementation of statutory nature targets in the Natural Environment Bill. The delivery plan actions must pave the way for meaningful targets and make specific reference to the areas that the statutory targets will cover. We would like to see an appropriate revision mechanism so that the actions can be updated once the Natural Environment Act comes into effect.

Introduce a Programme of Ecosystem Restoration

The key habitats should be more explicit and have individual actions developed around them, rather than only being included as a footnote.

Expand and connect existing areas of core rainforest to double its area, providing greater resilience to other threats such as climate change, ash dieback and nitrogen pollution.

We would like to see reference to the Riverwoods initiative and the catchment restoration initiatives being supported by the initiative[xi].

The protected and restored status definition needs to be robust and ensure ecosystem resilience, with expert considered evidence-based indicators of a restored habitat. The definition should align with that of protected areas status. It is not acceptable to maintain ancient woodland in poor condition. There must be incentive to ensure all ancient woodland are moving towards a recovered state and that they are resilient to future threats. Further clarity is needed on what landowner support means – it is important that this habitat is restored and protected. Landowners must have adequate understanding, funding/ finance, resources and drive to deliver effective management of

ancient woodland to ensure the habitat recovers and is protected. This is an opportunity to develop private finance mechanisms for high value nature restoration and protection.

We would welcome further detail on how the actions within this objective will be linked to Rural Land Use Partnerships and the forthcoming Agriculture and Rural Communities Scotland Bill. We are curious to understand how the large-scale landscape restoration areas will be decided upon, managed, and governed. We have provided detail of possible ways forward in the previous question. How will landowners and wider communities will be encouraged to be involved? Could it be that it becomes easier to access funding if in collaboration with neighbours?

Implement Scottish Plan for INNS Surveillance, Prevention and Control

There needs to be consideration of the wider issue not just the target species. What is it about these species that means we need to control them and how can we better target efforts to improve efficiency. We would like to know if there will there be a consultation on an implementation plan.

We are highly supportive of the emphasis in the Framework on habitat connectivity, however connecting habitats will also enhance the ability of grey squirrels and other INNS to spread. INNS control and monitoring should be considered in the management planning for all of the landscape elements included in the Framework, i.e., Nature Networks, 30 by 30 protected areas, nature restoration areas, National Parks and National Nature Reserves.

Improve Resilience in Coastal and Marine Systems by reducing pressures and increase and safeguard space for coastal habitat change

Adopting a source-to-sea approach, as outlined in the NatureScot report is advisable. There is a risk that actions in the marine environment lack support from corresponding measures on land and in freshwater, where 80% of ocean litter originates[xii]. Clearly defined plans and timelines for implementing these guidelines, such as the marine and coastal ecosystem restoration plan set for publication by 2025, are crucial.

This section lacks adequate focus on the biodiversity aspects of sea-level rise and the enhancement of coastal and marine ecosystem resilience. Insufficient attention is given to threats facing coastal species, whether from predation or habitat loss. Furthermore, actions should extend beyond resilience to encompass the recovery of coastal and marine ecosystems, maximising benefits for biodiversity and ecosystem services.

A more strategic approach is needed to integrate marine and coastal ecosystems within the national program for ecosystem restoration and the species recovery program.

Substantially reduce deer densities across our landscapes in parallel with ensuring sustainable management of grazing by sheep to improve overall ecosystem health

We are very supportive of the need for robust deer management. The actions included under this priority action are a good example of how actions could be SMART, as they include specific and measurable figures for deer densities that are achievable, realistic and time based. We would however like to see the same approach to the establishment of a national deer management programme. The action to explore how to support optimal herbivore densities for biodiversity outcomes in the upland should also be mirrored in the lowland, where there is significant impact from roe deer and non-native deer species.

We would also like to see consideration of the need for lower densities for riparian restoration zones. We would like to know to what degree will fencing be considered in the actions. We

encourage minimum fencing to ensure open habitats. Fencing is also very expensive and needs ongoing maintenance so we would argue it is not the best use of public money. The difference between species also needs to be taken into account when achieving deer density targets and how this integrates into the invasive non-native species strategy.

New deer legislation should go beyond the recommendations of the Deer Working Group to have the best outcomes for climate and biodiversity.

Develop a sustainable rainforest deer management regime over a 25,500ha area in this zone to allow the rainforest to regenerate naturally, which will enable it to sequester more carbon and ensure the long-term survival of its biodiversity.

Without a robust, geographically appropriate sustainable deer management regime the level of reduced impact from deer needed to support peatland regeneration and native woodland expansion will not be achieved. Further detail is needed on what is meant by "priority woodland" and how target deer density will be met and maintained. As we have stated above, we would recommend this covers all ancient woodland and we would count ancient woodland as all woodland present on 1st edition OS. We would also suggest there is prioritisation given to areas of connected woodland, particularly in the riparian zone.

NatureScot should be better supported to use existing powers to demand deer management plans from landholdings.

Community hunting and venison markets need to be supported, providing sustainable and affordable local meat markets.

Enhance water and air quality. Undertake water management measures to enhance biodiversity.

Implementing a programme of measures to restore catchments and rivers through River Basin Management Planning to achieve 81% of water bodies at 'Good' or better condition by 2027 is not sufficient as a key action for achieving river ecosystem restoration and halting biodiversity. This action only echoes current practices to maintain environmental status and avert further environmental degradation, rather than ambitious forward-thinking practices of restoration beyond 2027. We would like to see the Scottish Biodiversity Strategy move away from procedural compliance toward achieving specific environmental results, for example, completely mitigating the effects of diffuse pollution on water bodies through the incorporation of nature-based solutions such as river woodland planting schemes. The Wild Salmon Strategy highlights that the "achievement of RBMP targets may not provide adequate protection for salmon at the local and/or national scale", and this point is overlooked in the delivery plan. Furthermore, key actions and plans regarding restoring catchments and rivers to put Scotland on track to halt biodiversity loss by 2030 must involve greater coherence between RBMP, RLUPs, nature networks, and funding provided to land managers through replacement agriculture schemes, with significant consideration of how private investment might interact in this space.

We would also like to see consideration of the impact of pollution and litter reaching the marine environment. This should connect with a "source to sea" approach to tackling marine pollution.

Ensure Grouse Moor management sustains healthy biodiversity

We fully support the need to prevent burning on peatland except under exceptional circumstance. However, peatland plays a crucial role in our efforts to achieve mandated climate targets and mitigate the effects of global warming. Scientific evidence highlights that burning on peatland can harm native

species, disrupt important microtopography, and ultimately impact the overall health of the peatland habitat. This, in turn, diminishes the peatland's capacity to form additional peat and provide essential ecosystem services. Allowing peatland to undergo burning is not in the public's best interest, as it incurs costs to society through carbon emissions, biodiversity reduction, and poses a risk to significant public investments already made in peatland restoration across Scotland.

We recommend the Scottish Government redefines peat depth as 30cm (as opposed to 40cm) which would cover all internationally important blanket bog habitats[xiii]. This would take Scotland beyond the ambitions of the UK Government. There is considerable conflicting information on the carbon sequestration impacts of burning on peatland. It is important that the methods and results of studies are scrutinised through unbiased peer reviewed process.

Instead, adopting a strategy of rewetting peatland presents a more sustainable approach to managing wildfire risks while simultaneously addressing climate and biodiversity challenges. Numerous positive changes have been observed because of rewetting peatland, demonstrating its effectiveness in promoting ecosystem health and resilience.

The inconclusive outcomes of various scientific studies have impeded the adoption of a sensible approach to managing burning on peatland. This lack of clarity arises from inconsistent methodologies in data collection, making it difficult to compare and reliably interpret the results. Despite any gaps in evidence, we cannot use this as an excuse to continue burning. It is crucial to incorporate the precautionary principle into our approaches to land management to effectively address the climate and biodiversity crises. Even if the muirburn code becomes a mandatory legal requirement for land managers, monitoring the extensive areas where muirburn takes place will be challenging without significant resources, posing continued significant risks to our vital peat reserves.

The main concern is the risk to our essential peat reserves, coupled with a lack of trust in the grouse shooting industry to prioritise and safeguard peatland over grouse shooting interests. Enforcing the proposed license would be difficult, requiring substantial resources, and maintaining large portions of our land as monoculture hampers the development of greater biodiversity. Therefore, a license should not be granted for muirburn on peatland when its purpose is as unnecessary as facilitating more grouse shooting for a select few individuals as a sport.

The majority of moorland managed as grouse moors does not currently sustain healthy levels of biodiversity. They are degraded habitats that are heavily managed for a single species. A plan for restoring biodiversity on grouse moors is needed within the Code of Practice.

We would like to see a plan to link the management of grouse moors with natural capital accounts and wider ecosystem services provided.

Question 2c: Which actions do you think will have most impact?

We believe that the Introduction of statutory nature targets would raise the profile of biodiversity across Government portfolios, industry and in the minds of the general population – like that of Net Zero for climate change. A transformational shift is needed in the way we prioritise nature recovery and we believe that statutory nature targets will be the bedrock of this change, as such it is of utmost importance that these targets are well thought out. We encourage Scottish Government to give close regard to Scottish Environment LINK report on nature recovery targets and how the Natural Environment (Scotland) Bill might be drafted to introduce such targets on a statutory basis[xiv]

Deer management is a considerable "blockage" and the focus on deer is welcomed, we must see follow through and delivery of deer management at the scale necessary.

Protect nature on land and sea, across and beyond protected areas

Question 2d: Have we captured the key actions needed to deliver the objective: protect nature on land and at sea across and beyond protected areas?

Unsure

We welcome the actions laid out to deliver this objective, however we cannot say whether they will be sufficient to put Scotland on track to ending the loss of biodiversity by 2030. It is not sufficient to simply protect nature in its existing state as without restoration of current conditions biodiversity will continue to decline.

Ensure that at least 30% of land and sea is protected or conserved and effectively managed to support nature in good health by 2030 (30 by 30)

We endorse the efforts to fulfil the commitment of protecting at least 30% of Scotland's land and sea for nature by 2030 and enhancing protected areas[xv]. However, the actions outlined in this section need refinement to align with SMART criteria, and there are notable omissions.

The overarching action and the initial action in this section seem interchangeable, creating ambiguity. We recommend using the clearer and more specific wording of the '30 by 30' target from the first action in the list. Additionally, there is no reference to the intended outcome for protected areas in the section, i.e., 'protected areas will be larger, better connected and in good condition.' Even if the outcome itself is not explicitly mentioned, individual components of the section should be addressed in the actions, which is currently lacking.

The section should incorporate references to the framework for 30x30, ensuring consistency and clarity. Key actions outlined in the 30 by 30 framework, such as finalising criteria, establishing governance, and incorporating provisions in the Natural Environment Bill, should be explicitly duplicated here for coherence.

Emphasising the importance of monitoring, it is crucial for effective management of sites. However, budget constraints have led to a decline in monitoring frequency and depth. Securing long-term funding for monitoring protected land and sea is essential for achieving the 30x30 target.

We would encourage more specific detail on habitats beyond a narrow focus on woodland. All protected habitats should be brought into favourable condition.

Regarding Marine Protected Areas (MPAs), for them to contribute effectively to the 30x30 target, only the proportion of the network protected from the most damaging activities should be considered. This requires extending fisheries management measures across the entirety of seabed MPAs, adopting a comprehensive "whole-site approach." Other Effective Area-Based Conservation Measures (OECMs) could potentially contribute, subject to proper assessment and monitoring aligned with international recommendations.

Management measures for protected areas long overdue. We would like to see network expanded with better connectivity, consideration of mobile species (especially in marine protected areas), cumulative effects and robust monitoring and enforcement to avoid "paper parks". Additionally, an action is needed to assess the potential impacts of climate change on protected areas, outlining measures to improve resilience and flexibility across the protected area network, safeguarding nationally and internationally important species and habitats.

Expand the role of National Parks and ensure they act as exemplars of biodiversity protection and recovery

We support the ambition to designate at least one new National Park and to modernise the aims of National Park designation.

We strongly support the need to modernise the role of National Parks to lead nature recovery. We were pleased to see a continued desire for National Parks to focus on nature recovery, not only conservation and enhancement, combined with a focus on a just transition to net-zero carbon emissions. We would strongly suggest strengthening and improving the purpose of National Parks by stating "a just transition to net zero and nature positive". There is massive transition required to move towards nature positive and this will have impacts on ways of life and cultural capital.

The existing National Parks were created over 20 years ago, when there was limited understanding and awareness on the nature and climate emergencies. There is now clear evidence of the crises we are facing and understanding of how to halt, mitigate and adapt to the changes through the ways we use and manage the land and sea. As such it is urgent that goals of National Parks are updated amended to be coherent with the Government's stated aims on nature and climate.

Future and existing National Parks must demonstrate best practice when it comes to meeting net-zero carbon emissions and protecting and restoring biodiversity. They must be at the forefront of efforts to achieve the objectives of the Scottish Biodiversity Strategy, Environment Strategy, Nature Network and 30x30 commitments and be pivotal in delivering on legally binding targets from the forthcoming Natural Environment Bill.

National Parks need to adopt the Ecosystems-Approach[xvi] to land management "a strategy for the integrated management of land, water and living resources that promotes conservation and sustainable use in an equitable way". They should be exemplars of best practice, as with National Nature Reserves, and used to encourage those outwith the National Park to follow suit. Lessons learned from the both the Land Use Strategy and Regional Land Use Partnership pilots should be considered as well as learning from landscape scale people and ecosystem restoration projects such as Coigach & Assynt Living Landscape[xvii].

National Parks must play a key role in implementing nature networks across Scotland, acting as nodes for the wider restoration and protection of nature across Scotland. They must be seen as taking the lead to improve national connectivity of the natural environment and connection of people to nature. This must be done in a way that is place-based and community led, providing sustainable, nature-based economic opportunities and climate adaptation that improve community resilience.

National Parks should be areas where innovative ideas can be tested that will benefit the natural environment, climate and the local economy. Nature-based solutions should be identified and used wherever possible in National Parks to increase climate mitigation and resilience, and biodiversity in tandem. Large-scale, well-planned nature restoration should be a key focus of National Parks, for example, through the Riverwoods initiative to create a network of riparian woodland and healthy river systems[xviii]. Species reintroductions should also be led and demonstrated in National Parks.

National Parks can provide means for innovation and opportunities for nature-based investments with Park Authorities working with communities and Nature Scot to ensure positive impacts on nature and climate without greenwashing. They should fully embody and apply the Scottish Governments Principles for Responsible Investment[xix].

Contribution to protection and restoration of the natural environment should be a main criterion for selection of new National Parks. They need to be areas where nature restoration and protection will be most effective due to existing or future conditions, with effective guidance and sufficient support and input from local communities.

We do not believe this should limit the Scottish Government to selecting a rural, low populated area for a new National Park.

Fulfil the potential of National Nature Reserves (NNRs) for nature recovery

We are supportive of the ambition to increase the number of NNRs and for NNRs to become exemplars in nature conservation and restoration. As with National Parks, NNRs need to be areas where nature restoration and protection will be most effective due to existing or future conditions, with effective guidance and sufficient support and input from local communities.

We are curious about the aim of using NNRs to develop, deliver and demonstrate best practice in wildlife management. We would like to see more detail in the aim on what is considered best practice in terms of deer, INNS and predator control and what you hope to achieve. This should include reducing deer numbers to a point where fencing is not needed, removing Rhododendron ponticum entirely and having a considered and measured approach to deciding what predator number are appropriate for NNR goals.

NNRs have suffered long-term underinvestment and so have not made the contribution to biodiversity protection and enhancement that they could have. NNRs should be a source of pride in Scotland, demonstrating the possibilities of biodiversity in Scotland through best practise management.

We support the commitment to having a responsive approach to the planning and management of NNRs in light of the impacts of climate change. We would also like to see the explicit mention of monitoring as a focus of NNRs, as without the collection of robust data on the response of habitats and species to climate change, we will not know whether NNRs are fulfilling their potential.

Identify, expand and enhance Nature Networks and ecological connectivity

We strongly support the action for every local authority area to develop a nature network and ensure connectivity between important biodiversity areas, supported by robust policy frameworks, mapping tools and appropriate funding mechanisms.

We developed Edinburgh's Nature Network in partnership with the Edinburgh City Council[xx]. Edinburgh Nature Network is a blueprint for how these initiatives could be implemented in towns and cities across Scotland. This Nature Network was created by applying the environmental decision-making process outlined in the Ecological Coherence Protocol[xxi] and has also been used in the Inner Forth project[xxii]. It has community engagement at its heart and if applied in the correct manner can be a very inclusive approach. We encourage the use of this example to help local authorities plan and implement their nature networks.

Nature-based solutions should be a considerable part of nature networks as they offer a means of connecting biodiverse areas while increasing resilience to climate change, as well as offering ways to improve the health and wellbeing of local communities, especially in urban environments.

We are encouraged to see mention of Regional Land Use Partnerships. This is the only mention in the whole consultation despite the partnerships being previously cited as a policy mechanism that is seen by many stakeholders as necessary[xxiii]. We want to see far greater reference to RLUPs within

this document as we see RLUPs/Nature Networks as key tools to help prioritise and deliver biodiversity projects and importantly fund them.

The National Planning Framework 4 has numerous references to Nature Networks and their delivery through Local Development Plans.

Crucially the document states:

"*LDPs will identify and protect locally, regionally, nationally and internationally important natural assets, on land and along coasts. The spatial strategy should safeguard them and take into account the objectives and level of their protected status in allocating land for development. Spatial strategies should also better connect nature rich areas by establishing and growing nature networks to help protect and restore the biodiversity, ecosystems and natural processes in their area*."

"*Development proposals will contribute to the enhancement of biodiversity, including where relevant, restoring degraded habitats and building and strengthening nature networks and the connections between them. Proposals should also integrate nature-based solutions, where possible.*"

"*Development proposals for national or major development, or for development that requires an Environmental Impact Assessment will only be supported where it can be demonstrated that the proposal will conserve, restore and enhance biodiversity, including nature networks so they are in a demonstrably better state than without intervention*."

And

"*LDPs should identify and protect existing woodland and the potential for its enhancement or expansion to avoid habitat fragmentation and improve ecological connectivity, helping to support and expand nature networks. The spatial strategy should identify and set out proposals for forestry, woodlands and trees in the area, including their development, protection and enhancement, resilience to climate change, and the expansion of a range of types to provide multiple benefits. This will be supported and informed by an up to date Forestry and Woodland Strategy*"

The Biodiversity Consultation Document builds on this with a commitment to ensure that:

"every local authority area has a nature network to improve ecological connectivity across Scotland."

And a vison stating:

"*By 2030 Scotland will have evolving, flexible and resilient Nature Networks connecting nature-rich areas allowing wildlife and natural processes to move and adapt to land use and climate change pressures. The networks will help build people's connection to nature, providing biodiversity-rich spaces that deliver local benefits, and meet the priorities of local communities for nature*"

The detail on this within the consultation document is mainly contained in "Objective 2 Protect Nature on Land and at Sea across and beyond Protected Areas" within the delivery plans proposals

- *Ensure nature networks are implemented in every Local Authority area to provide connectivity between important places for biodiversity, deliver local priorities and contribute to strategic priorities at regional and national scales by 2030.*
- *Undertake mapping of opportunities for creating local-authority-wide Nature Networks by 2030.*
- *Incorporate and embed Nature Networks into policy frameworks and decision making processes as a component of Local Development Plans and Regional Land Use Partnerships nationally by 2030.*

- *Support local authorities in their land use decision making to deliver overall positive outcomes for biodiversity and the creation of nature networks, through developing toolkits, including a nature networks mapping tool and development of training by 2025.*
- *Develop an open source platform for blue and green infrastructure and other nature assets in urban areas to support approaches to valuing and financing blue and green infrastructure.*

The draft consultation document also identifies guiding principles:

- *Nature Networks will be delivered from the bottom up, addressing local needs and objectives in support of national outcomes for nature and people.*
- *Governance of Nature Networks will be transparent, democratic and accountable and with inclusive and diverse representation. There will be a focus on empowering and equipping delivery partners from across sectors.*
- *Engagement with partnerships and communities will be inclusive and empowering.*
- *Communications will include simple and unifying messaging on Nature Networks with a focus on building people's connection with, and fostering a stewardship of, nature.*
- *Scotland's public bodies will be exemplars, supporting the delivery of Nature Networks on their land.*
- *We will be adaptive in our approach to delivering Nature Networks and use the opportunity to improve our understanding of developing effective ecological connectivity.*
- *Monitoring approaches for Nature Networks will be developed with, and for, stakeholders to inform management and action that maximises effectiveness of the network.*
- *We will employ innovation and best practice in data collection, management and use.*
- *Mapping and use of data will be collaborative and holistic in approach.*
- *Public and private finance and funding will be delivered through properly resourced, clearly directed, long-term, simple and accessible means.*
- *Funding and finance will be based on the principles of fairness, trust and transparency through collaborative working.*
- *Funding and finance vehicles will be coherent and will continue to be maintained.*
- *Policy and planning levers will be used to safeguard Nature Networks and provide long term assurance*
- *Coherence across the policy landscape will be maintained.*
- *Mainstreaming Nature Networks, and wider biodiversity targets, at all levels of government and across the whole of society to encourage shared responsibility, efficient use of resources and delivery of multiple benefits (additionality)*

Additionally, the consolation points to a full draft policy framework on the Nature Scot website. Comments about that will follow. These comments are focused on the consultation document proposals.

The first question we must ask ourselves is, do all of the proposed actions, commitments and principles come together to deliver on the Nature Networks vision? Unfortunately, in our opinion they do not. That's not to say there aren't good things in this list, it is just they don't represent the step change required to meet the 2030 target of reversing declines in nature and implementing Nature Networks.

A good example of this would be the visions aspiration to have Nature Networks in place by 2030 but a delivery plan aspiration to only have mapping in place and Nature Networks embedded in policy by 2030. We would argue that you will not get successful achieve the vision without either mapping or policy embedment – these things don't add up to delivery.

We would suggest the wording of the delivery plan objectives on Nature Networks are amended to:

Place a duty on Scottish Ministers within the Environment Bill to have an ecologically coherent Scotland wide Nature Network, made up of locally developed bottom-up Nature Networks by 2030.

Create a specific Nature network reporting requirement for Local Authorities to update Scottish Ministers on 5 yearly progress and extent to help the Scottish Government fulfil its duty.

Enact regulations to create an infrastructure levy, payable to local authorities to help fund creation and delivery of networks and blue and green infrastructure.

Ensure nature networks are implemented in every Local Authority, within Local Delivery Plans, to provide connectivity between important places for biodiversity, deliver local priorities and contribute to strategic priorities at regional and national scales by 2030.

Provide a centralised resource within Nature Scot to help Local Authorities create opportunity maps to build nature networks by 2027, this should include resource for use of the Ecological Coherence Protocol[xxiv].

Use opportunity maps created by Local Authorities as the default route for delivering future net-gain or "positive effects for biodiversity" if these cannot be delivered on site and once the mitigation hierarchy has been adhered to.

Realign the aims and objectives of the Central Scotland Green Network to primarily be about delivering a coherent Nature Network across the CSGN area.

In order to further ensure Just Transition, the Governments Principles for Responsible Investment in Natural Capital should be made more robust and should direct those looking to invest in Scotland Natura Capital to use Nature Network opportunity mapping to work with local communities to identify suitable sites, this links strongly to the use of the Ecological Cohernace Protocol.

Additionally, there should be reference made to the importance of Local Nature Conservation Sites for development of Nature Networks.

Champion new planning and development measures for protecting and enhancing biodiversity

There is a missed opportunity here to commit to putting the Infrastructure Levy in place as described I the 2019 Planning Act by 2027. This would be SMART and crucially provide Local Authorities with much needed funds for green and blue infrastructure, as allowed by the levy as described I the Act. We recommend this is included I the revised draft.

The need for effective monitoring and enforcement is missing in this section, without this there is very little likelihood of these proposal being realised.

This section needs cross referenced with Nature Networks. We suggest a commitment is added to use Nature Network opportunity mapping is used as a tool to help indicate where "Positive Effects for Biodiversity" should be located if they cannot be created on site.

There is a missed opportunity to mandate certain types of green infrastructure that provide nature-based solutions for example green roofs or biodiverse rain gardens in new urban buildings.

We would like to see aspirations for a major project for nature by incorporating large-scale nature restoration areas into the National Planning Framework 4 (NPF4).

We recommend that the "Developing with Nature" guidance become a mandatory aspect of development plans rather than mere guidance.

We would like to see incorporation of a standardised biodiversity metric, providing additional details on its specific application and alignment with existing metrics in wider UK contexts to avoid the imposition of multiple metrics on developers across different countries.

Ensure that renewable energy projects adhere to biodiversity-positive principles, aligning their impact mitigation measures with those required for any other development.

Enhance biodiversity in Scotland's green and blue spaces

Blue and green infrastructure should serve as a nature-based solution whenever feasible, addressing challenges related to heat and flooding in urban developments, all the while providing biodiversity benefits. The incorporation of nature-based solutions should be mandatory wherever possible, requiring a strong justification for any exceptions.

Support for nature-positive amenity grassland management is crucial to enhance urban green spaces. Additionally, safeguarding high nature value brownfield sites is essential as they serve as a means to connect the urban population with nature. It is imperative to integrate these considerations into urban development plans for comprehensive nature-based solutions.

Regarding the concept of a National Charter, local authorities should go beyond merely "considering the need" for a vision for surface water management. Given the impending impact of climate change, sustainable surface water management should be deemed a necessity. Local authorities ought to be mandated to incorporate this into their local development plans to ensure proactive measures are taken.

The term "blue-green infrastructure" needs clarification. We recommend the adoption of the definition provided in the Planning (Scotland) Act 2019, which defines blue and green infrastructure as "features of the natural and built environments (including water) that provide a range of ecosystem and social benefits."

To enhance the success of the 30 by 30 protected areas, including National Parks, nature restoration areas, National Nature Reserves, and Nature Networks, it is essential to focus on delivering key actions aligned with the other five objectives. These areas should serve as 'exemplars' of best practices in nature protection, restoration, and wildlife management. Clarifying this relationship will contribute to a more coherent and compelling argument for prioritising nature-based solutions in the urban environment.

Question 2e: Are the key actions, to support the objective: protect nature on land and at sea across and beyond protected areas, sufficient to put Scotland on track to ending the loss of biodiversity by 2030?

Unsure

Scotland currently ranks 28th from the bottom in the Biodiversity Intactness Index and as such it is not enough to simply focus on protecting nature within protected areas. Protected areas and national parks should be areas for long-term restoration efforts along with protection. They need to be areas where people and nature can thrive together, supported by sustainable land management, connected and coherent restoration projects and robust protections. Protected areas are not exclusively areas of restriction, but should be areas for opportunities in innovative, biodiversity positive land management.

We support the ambition and the actions proposed to support the objective; however, it is difficult to fully understand the impacts these actions will have and if they will be enough to protect nature on land and seas across and beyond protected areas, sufficient to put Scotland on tract to ending the loss of biodiversity by 2030.

The actions must be strengthened by making them SMART to ensure they have the greatest impact. We also think that the absence of strategic land use planning tools such as Nature Networks and Regional Land use Partnerships is disappointing and must be addressed. Without these tools we will never realistically achieve the aim, far less do so within a "Just Transition" or by implementing "high-integrity natural capital markets" as these require both community engagement (which) scale in order to be successful.

The lack of mention of agriculture in this section is also disappointing and surprising, given that c.80% of Scotland is farmed in one way or another. Without farming policy that is designed to tackle the nature and climate emergency we will not possibly be able to protect nature outwith protected areas. Higher tier agricultural funding, as proposed by the agricultural reform process, should be linked to the delivery of nature networks.

Efforts to manage marine activities for nature recovery are falling behind those on land. While we acknowledge the positive steps in the plan, a more strategic approach is needed. Delays in inshore marine planning and a lack of ecosystem-based fishing management are concerns. The widespread impact of bottom-contact fishing is highlighted, with less than 1% of historically trawled areas protected. Urgent action is needed for an ecosystem-based approach, especially considering proposed measures designed before climate and nature crises were widely acknowledged.

The commitment to nature-friendly fishing is welcomed, but details on implementing an ecosystem approach to sea fisheries management are needed. Existing proposals for MPAs must be promptly implemented to halt biodiversity decline. However, the current program for protecting PMFs outside MPAs may only safeguard patches rather than enabling broader ecosystem recovery.

Management plans are crucial for designated nature conservation MPAs, especially for marine megafauna habitats. The Scottish Government's commitment to enhanced marine protection aligns with the draft Biodiversity Strategy, but clarity is sought on applying actions to meet EU targets. The EU recommends 10% "strict" protection of seas by 2030, requiring a transformative pathway from the Scottish Government. The Ocean Recovery Plan suggests establishing a commission for shared understanding and measures for ocean health.

To address delays, community engagement is crucial. LINK members with community engagement experience could contribute to coastal and marine enhancement efforts.

Question 2f: Which actions do you think will have most impact?

Ensuring existing protected areas are fully protected to achieve their conservation objectives and new protected areas are in place with community, landowner and other stakeholders support and there is a robust management and monitoring plan. However, all of these measures must be take forward and crucially the enabling framework of guidance, targets, condition monitoring and adequate funding and management must all be in place.

Embed nature-positive farming, fishing and forestry

Question 2g: Have we captured the key actions needed to deliver the objective: embed nature positive farming, fishing and forestry?

Unsure

Ensure increasing uptake of high diversity, nature rich, high soil-carbon, low intensity farming methods while sustaining high quality food production

Increased uptake of integrated pest management – what level of uptake is the government aiming for? How will the government increase uptake? This should be included as part of the support framework.

We recommend the Scottish Government follow the direction of the EU Soil Strategy for 2030[xxv]:

- making sustainable soil management the new normal, by proposing a scheme for land owners to get their soils tested for free, promoting sustainable soil management through the CAP and sharing best practices
- Legally binding targets to limit drainage of wetlands and organic soils and to restore managed and drained peatlands
- Reduce nutrient losses by at least 50%, the overall use and risk of chemical pesticides by 50% and the use of more hazardous pesticides by 50% by 2030

We believe that sustainable management and protection of soils in Scotland must be a priority not only for food production. Soils are major carbon sinks, underpin biodiversity and most ecosystem services. Soil itself hosts more than 25% of all biodiversity on the planet. There is currently a lack of coherent soil policy in Scotland and a lack of policy for monitoring soils. It is essential that we understand the health of soils and soil biodiversity across Scotland so that appropriate and effective changes can be made to management approaches.

Peat soils cover more than 20% of Scotland and store around 1600 million tonnes of carbon. There is a serious urgency to maintain healthy and recovering peatlands through ensuring ongoing payments that reflect the public benefits provided by peat soils and their associated peatland habitat. Better understanding is needed among land managers of the benefits provided by healthy or recovering peatland for their business and wider society. Agricultural support must include availability of long-term payments to protect investments already made and incentivise landowners and managers to act now with urgency.

Introduce an agricultural support framework which delivers for nature restoration and biodiversity alongside climate and food production outcomes

It is in the farm business' interest to make space for nature and use nature-based solutions to help mitigate the impact of climate change. Research from WWF Scotland highlighted that extreme weather in 2017-18 alone cost Scottish farmers £161 million due to livestock losses and lower crop yields[xxvi].

The effective management of agriculture and land on the 80% of Scotland designated for farming is crucial for attaining the country's legally binding climate goals and future nature targets. Consequently, it is important to establish an objective within the agricultural support framework aimed at achieving these targets. The benchmarks and measures set for agricultural policy should align with Scotland's National Outcomes and Performance Framework.

To accomplish this alignment, it is necessary to quantify how agricultural policy contributes to net-zero emissions and nature recovery targets. Additionally, there should be a stipulation for allocating the required budget to ensure the implementation of these contributions. Therefore, it is proposed to incorporate an aim to ensure its alignment with national climate change and nature targets.

We would like to mention of the payments supporting the following:

- Considering landscape-scale ecological restoration in line with the local "Nature Network" outlined in National Planning Framework 4 and the Scottish Biodiversity Strategy, both in whole farm planning and specific government scheme designs. Missed opportunities for collaborative action are a growing challenge to meeting nature commitments.
- Supporting the large-scale adoption of nature-based solutions benefiting farmers and wider society. These solutions aid climate change adaptation, nature restoration, and enhance farmland productivity. Funding should assist farmers, crofters, and land managers implementing nature-based solutions, including practices like agroforestry, cover cropping, natural field margins, and no-till management.
- Focusing on increasing tree presence on farms, especially in riparian zones.
- Backing agroecological principles and organic production.

The agricultural support framework must encourage the generation of public benefits from nature-based solutions across ARP Tiers 1–3, while simultaneously fostering business advantages through transitional, time-limited approaches like capital investment, skills development, or business support under Tier 4. Elevate baseline requirements and prioritise weightings within Tier 1 to achieve environmental outcomes. We would encourage incentivisation of NbS spans all farming scales, systems, and encompasses all payment Tiers.

Nature-based solution can aid farmers and land managers in mitigating climate change impacts by improving soil health, water retention, and resilience to wildfires, floods, and heatwaves, all while improving biodiversity. In a recent report we commissioned titled *the potential for nature-based solutions in Scottish agriculture*[xxvii] we provided 17 recommendations to improve the policy landscape in a way that would support a shift towards the wider use of nature-based solutions in farming and crofting across Scotland:

Leadership, coherence and commitment

1. **Embed a commitment in the Agriculture Bill to realise the Vision for Agriculture** - for Scotland to excel in sustainable and regenerative agriculture on a global scale.
2. **Develop ARP outcomes and metrics in alignment with Scotland's National Outcomes and Performance Framework**, quantifying contributions to net zero and nature recovery targets, and allocate corresponding budgets based on tiered weightings.
3. **Incentivise public benefits from NbS through Tiers 1–3 of the ARP**, with business benefits encouraged via transitional mechanisms, prioritising environmental outcomes and applying incentives across all farming scales.
4. **Establish long-term timeframes and budgets** in the ARP, ensuring safe sector-wide pivoting toward NbS; distribute the risk of changing farming models for NbS uptake beyond the sector's sole responsibility.
5. **Address policy inconsistencies** by elevating the Land Use Strategy's status, enhancing Regional Land Use Partnerships as per Scottish Land Commission recommendations, integrating Nature Networks, enforcing existing regulations and implementing forthcoming Muirburn legislation.

Learning and demonstration

6. **Enhance baseline data**, supporting ongoing initiatives like Tier 1 metric tools and NatureScot's landscape-scale data modelling through the ARP's National Test Programme.

7. **Integrate NbS into research institutes and government programs** to generate robust evidence on NbS benefits for agriculture.
8. **Draw insights from experiences elsewhere**; for instance, learn from Defra's research on the Environmental Land Management scheme, focusing on incentivising uptake, blending public and private finance, and paying for outcomes.
9. **Prioritise knowledge sharing and peer-to-peer learning** within the ARP's National Test Programme.
10. **Expand the pool of skilled advisors** by clearly signalling the shift toward NbS in agricultural policy and incorporating climate and nature considerations into standard agricultural courses, making NbS a fundamental aspect.

Winning hearts and minds

11. **Clarify expectations and timelines** within the ARP to eliminate current ambiguity.
12. **Tailor Scottish Government communications on NbS** to emphasise their business benefits. Challenge the perception of NbS as an add-on in sector media by sharing compelling stories of successful NbS integration.
13. **Involve more individuals with practical experience** in the policy design and testing process of the ARP.

Financial governance and integrity

14. **Implement stronger regulation of emerging carbon markets** based on the recommendations of the Scottish Land Commission, reinforcing the Scottish Government's Interim Principles on Responsible Investment in Natural Capital.
15. **Explore the certification of carbon credits**.
16. **Facilitate investment in NbS** by supporting collaboration across multiple landholdings, defining beneficiaries and mechanisms for collaboration, and exploring ways to blend public and private finance. Learn from initiatives like the Riverwoods initiative.
17. **Sustain and expand support for the development of new markets for ecosystem services** beyond carbon, such as Biodiversity Net Gain, leveraging initiatives like the Facility for Investment Ready Nature in Scotland (FIRNS) and Investment Ready Nature in Scotland (IRNS).

Improving the ability and willingness of land managers to accommodate beavers is crucial to embedding nature positive farming, fishing and forestry. Grant schemes and agricultural subsidies should properly incentivise planting of riparian buffers on PAL with the expansion of the beaver population being a key motivation for this. Increasing investment in NatureScot's Beaver Mitigation Scheme and making compensation available for farmers who have incurred significant financial costs as a result of beaver damage would help more farmers to tolerate beavers on their land. Research into beaver impacts on migratory fish in a Scottish context should be prioritised.

Farmers should also be encouraged to facilitate floodplain connectivity in key areas with the greatest potential to reduce severity of flooding at a catchment scale (i.e. pay farmers to take land out of production and allow it to flood). Such sites would also have greater suitability for beaver colonisation than the canalised rivers common in agricultural landscapes.

To support the key action "Ensure that forests and woodlands deliver increased biodiversity…" We would like to see grey squirrel control and monitoring recognised as a fundamental component of any sustainable woodland management plan where grey squirrels are present, particularly in red squirrel priority areas. The Forestry Grant Scheme is a key mechanism for this, however updates to

the scheme in line with SSRS recommendations are required in order for it to be fully effective in supporting strategic landscape-wide grey squirrel control efforts.

There should be an action to ensure management of priority INNS and deer is embedded in forestry operations, particularly native woodland creation and restoration projects.

Implement further fisheries measures in vulnerable marine ecosystems and to protect PMFs outside MPAs

We welcome measures for protection of PMFs outside of MPAs. Again, we would reiterate that fisheries management measures for MPAs long overdue. We would encourage greater ambition by establishing targets for the recovery of marine biodiversity, encompassing the status and extent of vulnerable seabed habitats. The existing data is outdated, with most surveys conducted almost a decade ago. Consequently, effective monitoring and resourcing for updated assessments should be incorporated into the proposed actions. We question the necessity of revising the PMF list, particularly given the ongoing delay in establishing protection for vulnerable benthic PMFs beyond the MPA network. We presume that this review will not impact the process to protect the 11 identified PMFs and will not lead to the omission of any vulnerable species and habitats requiring enhanced protection.

Both Scotland's Marine Atlas (2011) and the updated Marine Assessment (2020) identified commercial mobile demersal fishing as the most widespread pressure impacting seabed habitats. Certain fish and shellfish stocks continue to be depleted due to historic over-exploitation. Urgent establishment of fisheries management measures is required to protect designated features within MPAs designated nearly 10 years ago. Proposals for managing fishing activities inside and outside MPAs must contribute to ecological improvement, considering the concerns raised in Scotland's Marine Assessment 2020 and the interconnected global climate and biodiversity crises.

Fisheries management approaches should adopt an ecosystem-based perspective and incentivise low-impact fisheries to align with the objectives of the Fisheries Act 2020, including sustainability, precautionary measures, ecosystem considerations, and addressing climate change. These measures are essential in line with the actions outlined in the Future Fisheries Management strategy.

Closer attention should be paid to activities near or at MPA boundaries, as their impacts could extend to designated features within protected sites. To address this, we recommend extending the Environmental Impact Assessment (EIA) regime for marine activities within Nature Conservation MPAs and offshore MPAs to cover activities near or at MPA boundaries.

A crucial missing action is for the Scottish Government to make a time-bound commitment to outline a climate-smart fisheries strategy. This strategy should aim to halt damaging activities in offshore MPAs where protected features are impacted, reduce damage to carbon stores beyond the MPA network, decrease UK dependence on bottom towed fishing gears, and promote low-impact, low-carbon fisheries. We know that bottom trawling is having a detrimental effect on the seabed and the future sustainability of fishing and so this must be addressed.

Implement a sustainable approach to sea fisheries management, using best available scientific advice and minimising adverse impacts on non-target species and habitats

We encourage the implementation of Scottish Environment LINK's Ocean Recovery Plan[xxviii], which established ways towards low-impact, demonstrably by-catch-free, high-value nature, and climate-positive fisheries. These fisheries aim to maintain healthy and resilient stocks, foster sustainable

fishing opportunities, support coastal communities, and stimulate the growth of the domestic seafood market.

To advance this vision, particularly in response to the Future Catching Policy consultation[xxix], we endorse and propose the following measures for a just transition:

1. A mechanism to enhance inshore fisheries governance and transition to a new spatial management regime, including a presumption against trawling and dredging in a significant portion of Scotland's inshore waters.
2. Binding targets to cease over-fishing and eradicate bycatch and entanglement of non-target and protected species.
3. A mandate for fully documented fisheries through Remote Electronic Monitoring (REM) with cameras to enhance data collection and eliminate Illegal, Unreported, and Unregulated (IUU) fishing.
4. Implementation of a new vessel licensing system allocating fishing opportunities based on transparent and objective environmental, social, and economic criteria to incentivize sustainable, low-impact fishing practices.
5. Development of Fisheries Management Plans for all commercially targeted stocks and species, explicitly aligned with the Fisheries Objectives within the Fisheries Act 2020.
6. Undertaking a comprehensive and transparent review of Scotland's fishing capacity, both inshore and offshore, concerning fishing opportunities.

In alignment with Scottish Environment LINK's proposal for spatial management of fishing, we advocate for an inshore low-impact zone, No-Take Zones, static-gear only zones, mobile-gear only zones, and areas dedicated to nature conservation and recovery. We welcome commitments such as completing Marine Protected Area (MPA) designations, enhancing protection for Priority Marine Features beyond the MPA network, introducing Highly Protected Marine Areas (HPMAs) for at least 10% of Scotland's seas, and capping inshore fishing activity to three nautical miles. However, we assert the need to ensure the effective implementation of these commitments for ecosystem-based, climate and nature-smart fisheries management.

We highlight the importance of emphasising the evaluation of Scotland's seas' carrying capacity, especially the seabed, which Scotland's Marine Assessment 2020 continues to express concerns about. It is crucial to assess the mix of gear types and effort operating within environmental limits, determine their spatial distribution, and establish a credible, transformative, socially just, and equitable pathway.

In line with Scottish Environment LINK's recent consultation response[xxx], we strongly recommend the widespread adoption of Remote Electronic Monitoring with cameras (REM) beyond scallop and pelagic fisheries, extending to all vessels operating in Scottish waters. Prioritizing high-risk gear types, such as gill nets, long lines, and demersal trawls, will provide necessary data for sustainable fisheries management, address environmental impacts, demonstrate best practices, and support supply chain access. This approach will also facilitate the fulfilment of Fisheries Management Plans (FMPs), offering a feedback loop for managers and ensuring compliance with the legal objectives under the Fisheries Act 2020.

Implement Scotland's vision for sustainable aquaculture to minimise negative impacts on biodiversity.

We would like to see implementation of the Vision for Sustainable Aquaculture[xxxi] which fulfils a key Scottish Government pledge in the Bute House Agreement and Programme for Government. We

have stated in Scottish Environment LINK's response to consultation on the sea lice risk assessment[xxxii] framework that we want to see stricter enforcement of breaches by aquaculture companies. Additionally, there needs to be consideration of marine pollution from aquaculture, which can cause pesticide pollution to the local environment.

Ensure that forests and woodlands deliver increased biodiversity and habitat connectivity alongside timber and carbon outcomes.

Ensure that forests and woodlands deliver increased biodiversity and habitat connectivity alongside timber and carbon outcomes – how will they balance priorities. Plantations on peat over 30cm in depth should be restricted. Link with the largescale landscape restoration areas. Greater focus on outcomes rather than the processes – how will this ensure action and what action is needed?

Question 2h: Are the key actions, to support the objective: embed nature positive farming, fishing and forestry, sufficient to put Scotland on track to ending the loss of biodiversity by 2030?

Unsure

We would reiterate the points made for the previous question. Without greater detail on the future policies for farming, fishing and forestry we are not convinced that the key actions will be sufficient to meet the 2030 goal of the Scottish Biodiversity Strategy.

There is urgent need for transformational change in the way we manage and exploit our land and seas. To achieve the target of ending biodiversity loss by 2030 the key actions need to be made SMART.

We are disappointed that the agricultural actions are simply restated existing policy, we need to be shown clearly what this action plan is doing to drive action, not for it to simply bring together the "green bits" existing documents.

There is a lack of detailed information on numerous actions and policies within the marine environment, especially concerning the specifics of "enhanced marine protection" in place of the Highly Protected Marine Areas by 2026 commitment. There are details missing on the inshore cap consultation, sustainable fisheries management controls, protection measures for PMFs beyond the MPA network, and the content of proposed Fisheries Management Plans (FMPs), including the commitment to scallop dredge FMPs. The lack of information makes it difficult for us to comment on whether the actions are sufficient to put Scotland on track to ending the loss of biodiversity by 2030, despite the positive nature of many overarching actions.

Urgency in implementing fisheries management measures for both offshore and inshore MPAs, including significant inshore MPAs and the harbour porpoise SAC, as well as the protection of PMFs beyond the MPA network, is of utmost importance. Furthermore, a critical review of MPA management measures against the latest scientific evidence and the footprint of marine industries is essential to ensure their continued effectiveness in addressing the climate and nature crises.

Question 2i: Which actions do you think will have most impact?

Farming accounts for around 80% of Scotland's land use. If we can ensure that agricultural land management across Scotland is sustainable and biodiversity positive this will result in a significant positive impact for biodiversity.

Biodiversity in commercial forestry, including a mix of woodlands and appropriate deer control. The amount of land given over to commercial forestry demands that plantations are managed in a biodiversity positive way as far as commercially viable.

We believe that work with stakeholders to focus on identifying practical, achievable actions to reduce pressure on habitats most at risk or most extensively impacted by 2028 is potentially the most important in the marine environment because if you do not have buy in from fishers then everything else proposed will be that bit more difficult to achieve, as we have seen with the plan to introduce Highly Protected Marine Areas. Engagement is key for all on the ground changes.

Protect and support the recovery of vulnerable and important species and habitats

Question 2j: Have we captured the key actions needed to deliver the objective: protect and support the recovery of vulnerable and important species and habitats?

Unsure

Revise Scotland's list of priority species and habitats for biodiversity conservation.

More information is needed on the process and people consulted for the revision of the Scottish Biodiversity List. It is important not to only focus on rare or endangered species. Species considered common are an essential part of the ecosystem and food web but often in decline, which will have catastrophic impacts across trophic levels. This list will have serious ramifications for the future of Scotland's biodiversity and should not be taken lightly, but it should also not result in a blinkered view and focus of species in Scotland. Allocation of resources? What evidence will be used to select species and habitats?

Additionally, there is a need for clarification on the key differences and applications of the Scottish Biodiversity List and the Species at Risk database. Understanding the distinct purposes of these lists is crucial for effective biodiversity management.

In relation to the Revised PMF List, we propose aligning it with National Marine Plan 2 to inform new policies. Given the evolving threats and new information since the last revision, updates are necessary. However, a precautionary approach should be applied, especially for species or habitats with limited information.

Develop effective species recovery, reintroduction and reinforcement programmes.

Again, we would emphasise the need for SMART actions, Scottish Plant Biodiversity Strategy (committed to in 2020) needs to be incorporated into the SBS.

Supportive of the need to continue species focused recovery programmes – these should be led by NatureScot and supported through government funding.

It is good to see a commitment to continue to support and build upon strategies and schemes to protect and expand populations of priority species, and we are pleased to see the red squirrel and Eurasian beaver mentioned in this key action as example species. It would be good to have more detail on how the government intends to support, fund, and build upon strategies and schemes for each priority species, i.e. by ensuring landowners and land managers are properly incentivised to make land management decisions that deliver for biodiversity, and are strongly deterred from engaging in illegal wildlife persecution. Greater investment in NatureScot's Beaver Mitigation Scheme, as well as proper incentivisation of riparian buffer zones on agricultural land, will be of utmost importance to facilitating the healthy expansion of Scotland's beaver population. Grey squirrel control needs to be embedded in the operations of local authorities and statutory agencies

for sustainable long-term delivery to ensure a future for the red squirrel in Scotland. The Wildlife Management and Muirburn Bill must become law to bring an end to illegal raptor persecution and unsustainable muirburn on grouse moors. We hope to also see red squirrels and beavers included in the revised Scottish Biodiversity List of species and habitats that Ministers consider to be of principal importance for biodiversity conservation in Scotland.

Questions arise about the existence of a list of species that Scotland holds internationally important populations.

Further measures to reduce human pressure, especially regarding specialists, prompt concerns about potential access restrictions and implications for the Scottish Outdoor Access Code. Signage effectiveness is also questioned.

We emphasise the importance of mapping genetic diversity risk, including risk from climate change and Invasive Non-Native Species (INNS). Public awareness of science and practice of translocations needs clarification, with a specific focus on community engagement best practices. The desired level of public awareness and whether it includes support or just understanding should be outlined.

In the realm of better biodiversity data, we recommend specifying timelines for achieving project goals. Additionally, greater monitoring and surveillance to manage pathogens and diseases prompt queries about a biosecurity strategy and the government's response plan in the event of a new outbreak. We encourage the Better Biodiversity Data project to champion open-source data as described by the Scottish Government's Open Data Strategy. Empowering the use of data to further scientific research and allow full transparency and best practice. There is also a balance to be found on the level of biodiversity data collected via citizen science vs professional surveying. Citizen science is an excellent way to collect data at a broader scale and over the long-term, while also enhancing public awareness and engagement with science, as we have found with our Great Scottish Squirrel Survey. However, it is difficult to ensure accuracy and reliability with citizen science data and there can be a lack of standardisation. We would like to see funding for citizen science projects and appropriate training, as well as funding for professional survey expertise to gather accurate and precise data.

Manage existing and emerging pressures to improve the conservation status of seabirds, marine mammals and elasmobranchs

We must look at having policies that are reactive to emerging threats, such as Avian Flu which was so devastating for seabirds, and for other threats like climate change which we know is affecting seabirds ability to forage and reducing breeding success, not to mention yet unknown impacts of the marine heatwave this summer.

For cetaceans we must be looking at noise pollution, displacement etc due to marine developments and this is where marine planning that is spatial is so critical as well as considering multiple developments that represent a cumulative impact that may affect cetaceans.

There must be consideration of marine tourism impacts as this sector continues to grow. Areas of high biodiversity will be most attractive to

We agree that there is a need to improve the evidence base for elasmobranchs and making better use of ongoing citizen science e.g. Orkney Skate Trust[xxxiii]

Implement measures to protect and recover Scotland's wild Atlantic salmon and migratory fish populations

We are still concerned about the impact of farmed salmon on wild Atlantic salmon populations in Scotland and believe that stricter regulation needs to be implemented to protect wild salmonid populations. We support the Salmon Interactions Working Group recommendation set out in 2020[xxxiv], followed by ministerial endorsement in 2021. We urge Scottish Government to implement the recommended changes, notably:

- Reforming the regulatory system to provide protection to wild salmonids. The new system should be fully resourced and meet the test of being robust, transparent, enforceable and enforced.
- A review of all sea lice treatments to ensure decisions are evidence-based and ensure the wider environment is protected.
- Existing sites that have an adverse impact on wild salmonids should be subject to tighter regulation or, if unable to reduce impact, be relocated.
- A range of new licensing conditions, which include:
    - the recording and reporting a weekly sea louse count;
    - the monitoring of sea lice levels in the environment (not just farmed salmon);
    - the requirement to contribute to research aimed at understanding the migratory behaviour of wild salmonids; and
    - 100% of all farmed fish to be retained within cages.
- Fines relating to escapes and sea lice to be invested into wild salmonid conservation work.

River systems must also be improved for migratory fish populations to improve. It is important that the system is considered and managed at a whole catchment scale. Considering source to sea effects, river woodland should be considered priority habitat in mitigating diffuse pollution and climate-induced increases in water temperature putting stress on wild fish populations, as well as other measures such as restoring natural processes in rivers, removing barriers to fish migration, and catchment scale restoration of water bodies.

Question 2k: Are the key actions, to support the objective: protect and support the recovery of vulnerable and important species and habitats, sufficient to put Scotland on track to ending the loss of biodiversity by 2030?

Unsure

We broadly support the ambition and the actions proposed to support the objective, however it is difficult to fully understand the impacts these actions will have and if they will be enough to protect and support the recovery of vulnerable and important species and habitats, sufficient to put Scotland on tract to ending the loss of biodiversity by 2030.

Question 2l: Which actions do you think will have most impact?

The Better Biodiversity Data project, if done well will enable meaningful action and understanding of how progress is being made to achieve the nature targets as part of the Natural Environment Bill. The Better Biodiversity Data project is important in improving our understanding of how climate change will impact the resilience of species and their how their geographical extent may change due to changing conditions.

Invest in nature

Question 2m: Have we captured the key actions needed to deliver the objective: invest in nature?

Unsure

Drive increased investment in Biodiversity and Nature Restoration

We are pleased to see aspirations for a biodiversity investment plan. We would like to see more detail of this action and believe that the biodiversity investment plan needs to be made available as soon as possible to galvanise investment in natures recovery. We would suggest that the Scottish Forum on Natural Capital and its sub-group, the Nature Finance Pioneers would be ideal forums to gain information and discuss with stakeholders.

The funding gap for restoration of nature is at a minimum £118 million a year when only considering the cost of woodland and peatland targets[xxxv]. While we welcome the dedicated Nature Restoration Fund, much more is needed to plug the gap and this should include both further public spending, through nature positive agricultural support payments for example, and private investment. The funding gap is only an estimate using the available data. We must not restrict investment in nature based on the figures available. Investment in nature has been shown to provide significant returns, for example investment in nature for community wellbeing can reduce cost to the NHS. One project demonstrated that for every £1 invested, there is £2.16 of benefit in terms of reduced costs of treating mental health related conditions[xxxvi]. The latest report commissioned by Scottish Government "Natural capital: economic benefits assessment" suggested that for every £1 invested in nature recovery would generate £1.35 for the economy[xxxvii].

We would welcome a review of the Nature Restoration Fund allocation. It is important to ensure it is making a difference for biodiversity and being allocated fairly across the country and to a diverse mix of organisations. The Fund needs a long-term vision to ensure continued support for longer delivery periods.

We are concerned about the significant reduction in funding for Scotland's environmental agencies since 2010. NatureScot's funding has been cut by 40%, from £69 million in 2010-11 to £61.1 million in 2023-24, while SEPA has experienced a real terms cut of 26% over the same period. Former Chief Executives of SEPA, Professor Campbell Gemmell and James Curran, have expressed environmental impact concerns. Despite increased demands on environmental agencies, funding cuts pose challenges in maintaining current standards. The plea is for the Scottish Government to prioritise environmental funding in the upcoming budget, recognising the importance of investing in nature for fiscal, social, and environmental benefits. The goal is to protect and increase funding for these agencies, addressing over a decade of real terms cuts.

<u>Explore attracting investment in rainforests</u>

Restoring Scotland's rainforest is an ambitious undertaking, with an estimated cost of £500m. Spread over a minimum 10-year period, directly targeting major risks to rainforest zones, and focusing on areas that can best contribute to the broader ecosystem restoration, this investment in Scotland's future will deliver long-term benefits to the rainforest zone and the communities that live there.

Current funding and funding mentioned in the consultation document focuses primarily on short term funding and full ecosystem restoration requires long term funding commitments.

While other sources of funding will no doubt be needed, funding from the Scottish Government is essential to blend with other kinds of funding and provide incentive to other funders.

<u>Agriculture payments</u>

As stated in our response to the Agriculture and Rural Communities (Scotland) Bill call for views[xxxviii] we eagerly await further details regarding the conditions for Tier 3 payments, particularly concerning the proposed targeted support for species and habitats.

In Tier 3, the focus must be on reversing nature loss, and we strongly recommend tying this payment to local nature networks opportunity mapping. This ensures that landscape-scale opportunities are effectively identified and acted upon. We express disappointment that no representative from the Scottish Government Agriculture team has participated in the Nature Scot stakeholder groups on Nature Networks or 30x30. This raises concerns about potential disconnects between different government departments and the risk of policy "incoherence."

Tier 3 holds significant potential for delivering positive outcomes for species and habitats, emphasising the need for cooperative action at scale. However, there should also be space for species-specific initiatives and funding. Given the gradual nature of ecological restoration, we recommend adopting long funding periods, such as 10/15 years or longer, allowing sufficient time for farm planning and ecological processes.

Our preliminary thoughts on schemes encompass various aspects:

- Ecosystem restoration at a landscape scale, with a strong emphasis on cooperative action and alignment with local nature network mapping.
- Management and habitat preservation for keystone species, such as beavers.
- Deer management, including unique lowland situations, with a focus on cooperative action.
- Initiatives for specific species management, such as waders and red squirrels.
- Specific habitat restoration and management, including coastal marshes.
- River renaturalisation and riparian habitat management.
- Agroforestry, involving the integration of agriculture with trees beyond the scope of "trees on farms."
- Addressing Invasive Non-Native Species (INNS), prioritising cooperative action.
- Nature-based solutions for water management.

Nature-based solutions present an opportunity to restore nature while benefiting the farm business in question and the broader community. For instance, restoring a riverbed and floodplain enhances biodiversity, reduces the risk of flooding and drought, and safeguards productive farmland, residents, and downstream businesses.

We appreciate the inclusivity of the proposed support set out in the Agriculture Reform Programme extending beyond traditional payment recipients. Supporting a diverse range of community groups and individuals outside conventional land management promotes a more varied outcome for rural land in Scotland, enhancing community resilience. Expanding access to these payments could be more effective if linked to opportunity maps produced by each local authority, ensuring a strategic and well-informed approach to nature restoration at a landscape scale, which is crucial for addressing the climate and nature emergencies.

Establish a values-led, high integrity market for responsible investment in natural capital – develop and enhance the woodland and peatland code

We support the need for responsible investment in natural capital and support the development and enhancement of the woodland and peatland code, but we would also like to see the development of

wider codes for investment in other habitats, such as grasslands, machair, seagrass beds, native oyster beds, etc.

The Agriculture Framework Bill has missed opportunities to highlight how private finance will be used by farmers, how this will interact with the Tier system, and how this will be used to meet 2030 nature and climate objectives. This must be addressed in this document and as an amendment to the Bill.

There is important for Government and other organisations, to support the on-going work of the Scottish Forum on Natural Capital and its Nature Finance Pioneers Sub-group.

Increase investment in Scotland's coastal and marine environments

The Nature Restoration Fund and SMEEF have criteria for coastal and marine initiatives that focus on restoration, recovery, and enhancement. However, it currently restricts projects to those with biodiversity and conservation outcomes (i.e. restoration) and excludes those focused on achieving social outcomes. We argue that addressing social outcomes in coastal and marine environments is crucial to create the enabling conditions essential for the delivering conservation outcomes on the ground.

We support investing in activities to help restore Scotland coasts and seas by 2028. However, these investments should also focus on increasing enforcement and monitoring. For example, The Marine Directorate of the Scottish Government should carry out a strategic review of its enforcement assets with a view to determining what further equipment or resources may be required to ensure an effective deterrence to illegal activities.

Provide direction on, and investment in green skills and local economic opportunities supporting nature-based education, nature restoration skills and volunteering

We support the importance of fostering professional development and knowledge exchange within the agricultural sector and discuss this in our response to the Agriculture and Rural Communities call for views[xxxix]. However, we seek further elaboration on the specific training initiatives that will be facilitated through Tier 4. We advocate for substantial learning opportunities for farmers, crofters, and land managers to explore nature-based solutions addressing local and societal challenges. Equipping them with the knowledge and skills to implement these solutions is imperative.

The advisory service plays a pivotal role in realising the Scottish Government's vision, and it is paramount that it receives adequate funding and support. Significantly, advisors must undergo upskilling to effectively navigate the necessary land use changes required to address the nature and climate crises. Simultaneously, they should provide guidance on producing high-quality, high-welfare sustainable food.

Encouraging continuous personal development within the farming community is essential. This approach not only creates new job opportunities but also fosters the "green-collar" revolution necessary for sustainable agricultural practices.

Funding should also be available to support an advisory service for land managers to help implement best practice.

Question 2n: Are the key actions, to support the objective: invest in nature, sufficient to put Scotland on track to ending the loss of biodiversity by 2030?

No

Developing a biodiversity investment plan is not an end in itself. The action should be to amend to state "to develop and implement a biodiversity investment plan by 2030, following consultation with engaged parties and local communities.

There needs to be a direct connection with the Agriculture Bill and the tiered payment scheme, so that public funding has the best value for money, achieving multiple outcomes and providing multiple benefits. Infrastructure levy, as described in Part 5 of the Planning (Scotland) Act 2019, would provide a funding source to support blue and green infrastructure.

We would question what the plan is beyond woodland and peatland and would like to emphasise that public funding for biodiversity must increase, private sector funding is not a replacement.

Question 2o: Which actions do you think will have most impact?

All of these actions are vital and will only have impact within a supporting framework and crucially with landscape scale planning in place.

Take action on the indirect drivers of biodiversity loss

Question 2p: Have we captured the key actions needed to deliver the objective: take action on the indirect drivers of biodiversity loss?

Unsure

Engage and strengthen the connection between people and communities with nature.

We support the aim to engage and strengthen the connection between people and communities and nature. It is vital that we have community-led decision making and the public onside to ensure support for the changes needed.

We are pleased to see inclusion of working with stakeholders to complete a review of opportunities for increasing community participation in safeguarding marine biodiversity by 2026. Secure resources and begin piloting new approaches by 2028. This is a a good opportunity to tap into local knowledge which again was a key finding from our Oceans of Value project[xl].

Embed biodiversity and nature in curriculum development.

We support the need to embed biodiversity and nature in curriculum development. This is key and our outreach during the Oceans of Value workshops illustrated that people want more education in schools and for adults as well to improve ocean literacy.

The indirect drivers of biodiversity loss operate on various scales, from global, national to local. It is important that Scotland plays its part at all levels. Influencing consumption habits and connection with nature of the Scottish people, but also the impact of the global commodity prices and availability of perverse incentives for over exploitation.

Mainstream and integrate biodiversity policy across government.

We support the need for mainstreaming and integrating biodiversity policy across government. It is important that there are no perverse government incentives, and all tax breaks or subsidies align with biodiversity goals. Those receiving public funding should be subjected to a biodiversity audit, including across supply chains, to ensure that funds are not negatively impacting biodiversity and public money is being best placed.

Engagement when decision making needs to be broader and more equal, for example agriculture policy making should include engagement with conservation NGOs, not only farm practitioners and their representatives. Important considerations can be missed if all relevant voices are not present. The ways in which consultation are conducted by Government should also be reviewed. The complexity and breadth of knowledge needed for a meaningful response to important consultations is exclusionary. If more people are to engage then a different approach is needed.

The biodiversity reporting duty has had little to no impact on how public bodies conduct operations. These bodies should be setting the standard for accountability and action to improve their ways of working for biodiversity. This reporting should be encouraged across private businesses, with incentives to engage and improve their ways of working.

Address unsustainable supply and demand to reduce biodiversity impacts.

We believe there is need for mainstreaming the actions in this section with the forthcoming Circular Economy (Scotland) Bill – reducing extraction and re-use of existing materials will reduce demand and impact on the natural environment. 90% of global biodiversity loss is caused by resource extraction and processing[xli] and as major consumers, Scotland has a significant part to play in reducing this pressure and the Scottish public agree[xlii].

We recommend that legislating for organisations to set science-based targets for nature and disclose nature-related risk and opportunities will help to deliver on the key actions to:

- Address unsustainable production, supply and demand to reduce biodiversity impacts and will initiate a shift towards sustainable natural resource consumption and trade.
- Support global and regional efforts to enable business to more effectively monitor and report on their national and global impacts on biodiversity.

We also recommend the Review of the Biodiversity Duty Reporting system in 2024, (with a view to aligning with climate change reporting including consideration of voluntary engagement by business sector), include an adjustment for the business sector to prepare for mandatory requirements to report on climate change and nature risks by… 2030.

Question 2q: Are the key actions, to support the objective: take action on the indirect drivers of biodiversity loss, sufficient to put Scotland on track to ending the loss of biodiversity by 2030?

Unsure

It is difficult to say whether the key actions are enough to put Scotland on track to ending the loss of biodiversity by 2030. The actions will all make considerable positive change to the trajectory of biodiversity in Scotland if successfully implemented, however the lack of detail within these actions does not inspire confidence. While many of the actions have dates by which the work would be completed most actions within this objective are not SMART. There is no explanation of what level of public connection and action for nature is being aimed for, for example.

Question 2r: Which actions do you think will have most impact?

Mainstreaming and integrating biodiversity across government, with a strong focus on a just transition will ensure that adverse incentives are not prolonged and policies are aligned to achieve the same goals for biodiversity and thar resources have the greatest impact.

Section 3 – Nature Networks Policy Framework

Question 3a: Do you have any comments on the Nature Networks Framework?

We are very supportive of the ambition on Nature Networks and that should be kept in mind when reviewing the constructive criticism outlined below. We support the participator co-design process, but we are keenly aware of the need to now provide concrete guidance.

The Scottish Wildlife Trust believes there are six priority areas for action if Nature Networks are to be taken forward in an effective and timely manner in Scotland:

1. Leadership – There is an important role and opportunity for Nature Scot to lead on strategic thinking, championing, coordination and successful role out of Nature Networks.
2. National coordination – Biodiversity does not respect local boundaries. National level coordination, dovetailed with local bottom-up approaches will ensure all opportunities are realised.
3. Clear guidance for local authorities
4. The Edinburgh Nature Network is a tried and tested blueprint that can be rolled out nationwide and embeds community engagement at the heart of the process.
5. Set a reporting requirement - The National Planning Framework 4 omits any mention of reporting duties in relation to Nature Networks. It is important to make sure planning authorities are clear about where and when different elements of the Nature Network are to be completed and where they are to be submitted for review.
6. Establish new funding streams - Creating local Nature Networks would require additional investment. Our estimates based on the experience with the Edinburgh Nature Network indicate that c. £1.6m p.a. for two years would provide enough funding to allow the other 31 authorities to get their Nature Network to the same position as that in Edinburgh. This funding is needed urgently and should be provided from central funds by Scottish Government. Additional funding mechanisms are available – such as the Infrastructure Levy – to ensure the next phase of development can be funded and that private sector investment can be unlocked.

Opportunity mapping for most appropriate land use options and areas for enhancing and connecting ecosystems. Link into the largescale landscape restoration areas and regional land use partnerships. The coordinated work across large scale areas will need adequate resourcing. Nature networks must not be a piecemeal collection of loosely connected projects. They must be led at a regional level to allow for the different challenges, opportunities and priorities of different regions and communities to drive nature network development.

Nature-based solutions can play a significant part of nature networks in connecting protected areas and high nature values areas through land management that provides space for nature, climate change mitigation/ adaptation and wider ecosystem services for society and local communities.

Ongoing management and monitoring of nature networks will be necessary and appropriate funding will be needed.

How to connect rural and urban areas – a benefit of nature networks would be blurring the divide between the urban and rural environments. A nature network should connect urban and rural communities.

Comments on the Framework:

General

We do not see the guidance framework as being useful, beyond background information, for a Local Authority charged with taking this forward. We need a far greater emphasis on practical steps and particularly opportunity mapping. In this regard we suggest this guidance is urgently reviewed so it is of more practical use, we are hopeful the "toolbox" will provide very clear step by step guides for Local Authorities. We acknowledge a lot of hard work has gone into creating the document as it stands but it is more of a "download" of the co-design meetings than a practical framework guide.

Clarity around where Nature Networks sit within wider biodiversity and land use strategies would be very useful for Local Authorities and the wider policy community.

Governance

The Governance framework suggested looks workable. However, this will need suitable funding and staff capacity both within Nature Scot and within Local Authorities. What is not addressed in Governance is where Nature Networks sit within the multitude of other landscape scale planning initiatives from Government, this needs addressed. It would look like the Governance side of things for both Nature networks and 30x30 would sit initially with Scottish Government, we would urge them to move this forward urgently.

The Governance section also does not address reporting requirements, something new see as essential to the success of Nature Networks. We saw with the previous Biodiversity Duty that when reporting is ill-defined it leads to a lack of action/compliance.

We suggest that a duty is placed on Scottish Ministers to deliver the wider Scottish Nature Network, without this we are concerned we will not get a coherent Scotland wide or regional network. The Natural Environment Bill would be the best place to confer this duty.

Participation

This section looks focused on voluntary participation, what is there to compel Local Authorities? We suggest the Local Development Plan requirement is referenced here.

We suggest that an annual conference is developed to share learning and boost profile of 30 by 30 and Nature Networks.

Knowledge

There is a failure to appreciate that the skills gaps go beyond local authorities, it also needs to highlight that these skills are absent across all industry sectors.

Data

The next steps should include a commitment referencing the Delivery Strategy around the need for greater public access to all ecological data. This will be essential for effective opportunity mapping.

Funding

It is unclear what the next steps are here, beyond waiting for some workstreams to complete. There needs to be a far clearer explanation for Local Authorities around how they will fund initial mapping.

We suggest explicit reference is made to the potential for the Infrastructure Levy to be used as a local fund-raising tool for green and blue infrastructure development.

Policy:

Again, it is unclear what the next steps are here. There needs to be clearer signposting given to Local Authorities.

Section 4 – 30 by 30 Policy Framework

Question 4a: Do you have any comments on the 30 by 30 Framework?

We support the participator co-design process.

We are detecting confusion from many areas about where the responsibility to deliver 30 by 30 sits i.e. with Local Authorities of National Government. To clarify this, we suggest the Natural Environment Bill confers a legal duty on Scottish Ministers to deliver 30 by 30.

Existing protected areas must have robust management and monitoring measures, along with significant compliance measures. There is an opportunity for the proposed Ecocide (Prevention) (Scotland) Law to support the protection of designated areas.

There is a risk of simplifying designations via Natural Environment Bill. Environment Standards Scotland could be given a role in overseeing this by ensuring there will not be any weakening of protections.

Within the marine environment governance must be robust and local stakeholders must be involved from earlier stage in process so there is community buy in and avoid recent situation with HPMAs.

We are supportive the Scottish Environment LINK answer here:

In general, the points highlighted in the framework are welcome. Scottish Environment LINK produced a 2022 report 'Making 30 by 30 meaningful for nature'. This proposes some key high level principles for delivering 30 by 30:

- Sites counting towards 30 by 30 are identified as being important areas for biodiversity;
- Sites must meet two criteria to count towards the 30% target:
    - Be protected for nature in the long-term: the entirety of the 30% should be afforded robust protection against damaging development, land and sea use.
    - Be well managed and in good or recovery condition, with appropriate monitoring to determine this.
- A real focus on quality as well as quantity of sites, with significant action and funding to improve our existing protected areas and ensure all new sites are maximising their contribution to nature's recovery.

We are pleased to see that the draft 30 by 30 framework aligns with many of the high-level principles recommended by the report.

Positives:

- The focus on effective protection and management.
- We also agree that 30 by 30 is an opportunity for Scotland to refresh its approach to area-based conservation, improving our existing protected areas and learning from successes and

experience, for example by taking a more strategic, landscape-scale approach to addressing condition of protected areas.
- The transparent and disaggregated reporting of the condition of designated features in the framework, which is something that LINK has advocated for many years.

The vision for 30x30 and high-level principles for identifying sites is welcome, in particular:

- That sites must be important areas for biodiversity and ecosystem services.
- That large areas within National Parks do not meet the criteria of the CBD Target 3 and therefore National Parks do not currently count in their entirety.
- That National Scenic Areas do not count towards the 30%.
- That sites of local importance for biodiversity and land under restoration for nature should not automatically count.
- The proposals for a pipeline approach.
- Recognition that Other Effective Area-Based Conservation Measures (OECMs) provide a key opportunity for a more bottom-up approach to site protection, allowing for inclusion of a much greater group of stakeholders to contribute towards the target. We agree this is a distinct advantage of OECMs if, clear and robust criteria are created for OECMs to ensure long-term protection from damage and effective management and monitoring, and if combined with efforts to complete the existing suite of statutory protected areas to ensure ecological representativeness.
- Recognition of the importance of community participation in the process and need to commit adequate resources to this.

Negatives:

The framework fails to propose substantive solutions and actions to address the challenges set out and lacks urgency to immediately kickstart delivery, given that the 2030 deadline is only 7 years away. We urge the Scottish Government and NatureScot to work with stakeholders to **i**dentify some initial priority actions for 30 by 30 delivery that can progress immediately, whilst more detailed plans are being consulted on and finalised, for example:

- Setting up **governance structures** for 30 by 30 to engage stakeholders in further co-design on development and delivery of 30x30. We suggest this could include a landowner/occupier/practitioner group to focus on protected area management and a more policy focused group.
- Set **new targets to improve the condition of protected land** and **progress a strategic programme** to deliver this, working with the above stakeholder groups.
- Undertake a **light-touch review to collate known sites that meet existing designations criteria** that could then be prioritised for 30 by 30 inclusion, involving Scottish Environment LINK members, research institutions and other key stakeholders in the review.

We agree with the intention to improve the system of protected areas through the Natural Environment Bill. We are cautious about any proposals to amend or simplify the designations system, as any weakening of protections for designated sites would represent a significant regression in environmental standards and would undermine the vision and objectives of the SBS. However, we are reassured by the proposal for Environmental Standards Scotland to oversee the process and ensure there is no weakening of protections. LINK members are developing further views on what improvements could be made to the protected areas systems and would appreciate the chance to feed our views into this process.

We are disappointed that there is no proposal in the framework to set new condition targets for protected areas. We strongly urge the Scottish Government to set new targets for protected area condition in the SBS delivery plan/ Natural Environment Bill/secondary legislation.

We are disappointed to see no mention of proposals for identifying sites that would complete our existing networks of nationally and internationally important sites. Identifying and protecting sites that already meet the selection criteria for SSSI, SPA and SAC, particularly for habitats or species that are irreplaceable and/or currently under-represented in Scotland's protected areas would be a logical first step for the Scottish Government's delivery of 30 by 30 and would help to ensure the network is coherent and ecologically representative.

We are concerned that the new approach to monitoring will not be finalised until 2025/26. Sites monitoring in Scotland was suspended four years ago, in 2019. We are concerned at the rate of progress in developing the new system. Whilst monitoring has restarted, we understand that it has been significantly reduced in terms of frequency. There is a risk of more sites falling into poor condition due to lack of data about feature condition and therefore no trigger for action to be taken.

We welcome that the draft framework has tried to look at the issue of funding and finance for 30 by 30 – we agree that this is absolutely integral to achieving this target. Budgets for monitoring and management of protected areas have substantially declined in Scotland over the past 15 years and this has had a detrimental effect on core responsibilities relating to sites being carried out by NatureScot and other stakeholders. Monitoring levels have significantly reduced, decreasing the amount of up-to-date data on site condition that is available to inform management of these sites and to inform important casework decisions. Whilst we agree with the analysis presented on funding in the draft framework and support further work to explore how to draw in more private finance to help deliver 30 by 30, we are concerned that long-term core functions will get lost in these discussions and must instead be front and centre. We suggest that NatureScot carry out a comprehensive review to determine the minimum levels of public resource required over the long-term to ensure that this target delivers for nature. The Scottish Government must find ways to ensure sufficiency of resources given the international commitments to deliver 30 by 30.

Nature Networks

The National Planning Framework 4 has numerous references to Nature Networks and their delivery through Local Development Plans.

Crucially the document states:

"LDPs will identify and protect locally, regionally, nationally and internationally important natural assets, on land and along coasts. The spatial strategy should safeguard them and take into account the objectives and level of their protected status in allocating land for development. Spatial strategies should also better connect nature rich areas by establishing and growing nature networks to help protect and restore the biodiversity, ecosystems and natural processes in their area."

"Development proposals will contribute to the enhancement of biodiversity, including where relevant, restoring degraded habitats and building and strengthening nature networks and the connections between them. Proposals should also integrate nature-based solutions, where possible."

"Development proposals for national or major development, or for development that requires an Environmental Impact Assessment will only be supported where it can be demonstrated that the proposal will conserve, restore and enhance biodiversity, including nature networks so they are in a demonstrably better state than without intervention."

And

"LDPs should identify and protect existing woodland and the potential for its enhancement or expansion to avoid habitat fragmentation and improve ecological connectivity, helping to support and expand nature networks. The spatial strategy should identify and set out proposals for forestry, woodlands and trees in the area, including their development, protection and enhancement, resilience to climate change, and the expansion of a range of types to provide multiple benefits. This will be supported and informed by an up-to-date Forestry and Woodland Strategy".

The Biodiversity Consultation Document builds on this with a commitment to ensure that:

"Every local authority area has a nature network to improve ecological connectivity across Scotland."

And a vison stating:

"By 2030 Scotland will have evolving, flexible and resilient Nature Networks connecting nature-rich areas allowing wildlife and natural processes to move and adapt to land use and climate change pressures. The networks will help build people's connection to nature, providing biodiversity-rich spaces that deliver local benefits, and meet the priorities of local communities for nature".

The detail on this within the consultation document is mainly contained in "Objective 2 Protect Nature on Land and at Sea across and beyond Protected Areas" within the delivery plans proposals:

- Ensure nature networks are implemented in every Local Authority area to provide connectivity between important places for biodiversity, deliver local priorities and contribute to strategic priorities at regional and national scales by 2030.
- Undertake mapping of opportunities for creating local-authority-wide Nature Networks by 2030. The work already taken forward via the Civtec/AECOM project should be kept in mind here.
- Incorporate and embed Nature Networks into policy frameworks and decision-making processes as a component of Local Development Plans and Regional Land Use Partnerships nationally by 2030.
- Support local authorities in their land use decision making to deliver overall positive outcomes for biodiversity and the creation of nature networks, through developing toolkits, including a nature networks mapping tool and development of training by 2025.
- Develop an open-source platform for blue and green infrastructure and other nature assets in urban areas to support approaches to valuing and financing blue and green infrastructure.

The draft consultation document also identifies guiding principles:

- Nature Networks will be delivered from the bottom up, addressing local needs and objectives in support of national outcomes for nature and people.
- Governance of Nature Networks will be transparent, democratic and accountable and with inclusive and diverse representation. There will be a focus on empowering and equipping delivery partners from across sectors.
- Engagement with partnerships and communities will be inclusive and empowering.
- Communications will include simple and unifying messaging on Nature Networks with a focus on building people's connection with, and fostering a stewardship of, nature.
- Scotland's public bodies will be exemplars, supporting the delivery of Nature Networks on their land.

- We will be adaptive in our approach to delivering Nature Networks and use the opportunity to improve our understanding of developing effective ecological connectivity.
- Monitoring approaches for Nature Networks will be developed with, and for, stakeholders to inform management and action that maximises effectiveness of the network.
- We will employ innovation and best practice in data collection, management and use.
- Mapping and use of data will be collaborative and holistic in approach.
- Public and private finance and funding will be delivered through properly resourced, clearly directed, long-term, simple and accessible means.
- Funding and finance will be based on the principles of fairness, trust and transparency through collaborative working.
- Funding and finance vehicles will be coherent and will continue to be maintained.
- Policy and planning levers will be used to safeguard Nature Networks and provide long term assurance
- Coherence across the policy landscape will be maintained.
- Mainstreaming Nature Networks, and wider biodiversity targets, at all levels of government and across the whole of society to encourage shared responsibility, efficient use of resources and delivery of multiple benefits (additionality)

Additionally, the consultation points to a full draft policy framework on the Nature Scot website. Comments about that will follow. These comments are focused on the consultation document proposals.

The first question we must ask ourselves is, do all the proposed actions, commitments and principles come together to deliver on the Nature Networks vision. Unfortunately, in our opinion they do not. That is not to say there are not good things in this list, it is that they do not represent the step change required to meet the 2030 target of reversing declines in nature and implementing Nature Networks.

A good example of this would be the visions aspiration to have Nature Networks in place by 2030 but a delivery plan aspiration to only have mapping in place and Nature Networks embedded in policy by 2030. We would argue that you will not get successful achieve the vision without either mapping or policy embedment – these things do not add up to delivery.

We would suggest the wording of the delivery plan objectives on Nature Networks are amended to:

Place a duty on Scottish Ministers within the Environment Bill to have an ecologically coherent Scotland wide Nature Network, made up of locally developed bottom-up Nature Networks by 2030.

Create a specific Nature network reporting requirement for Local Authorities to update Scottish Ministers on 5 yearly progress and extent to help the Scottish Government fulfil its duty.

Enact regulations to create an infrastructure levy, payable to local authorities to help fund creation and delivery of networks and blue and green infrastructure.

Ensure nature networks are implemented in every Local Authority, within Local Delivery Plans, to provide connectivity between important places for biodiversity, deliver local priorities and contribute to strategic priorities at regional and national scales by 2030.

Provide a centralised resource within Nature Scot to help Local Authorities create opportunity maps to build nature networks by 2027, this should include resource for use of the Ecological Coherence Protocol[xliii].

Use opportunity maps created by Local Authorities as the default route for delivering future net-gain or "positive effects for biodiversity" if these cannot be delivered on site and once the mitigation hierarchy has been adhered to.

Realign the aims and objectives of the Central Scotland Green Network to primarily be about delivering a coherent Nature Network across the CSGN area.

To further ensure Just Transition, the Governments Principles for Responsible Investment in Natural Capital should be made more robust and should direct those looking to invest in Scotland Natura Capital to use Nature Network opportunity mapping to work with local communities to identify suitable sites, this links strongly to the use of the Ecological Coherence Protocol.

Within the guidance framework on Nature networks aimed at Local Authorities:

We would like to see greater prominence on the use of Local Nature Conservation sites to effectively build Nature Networks and involve local communities, especially since Nature Scot is just about to publish new guidance on Local Nature Conservation Sites.

Section 5 – Impact Assessment Part A

Section 6 – Statutory Targets for Nature Restoration

Question 6a: Do you agree with this approach to placing targets on a statutory footing?

Yes

We welcome the plan to introduce statutory targets for nature restoration and we broadly support the approach to placing targets on a statutory footing.

The Biodiversity Intactness Index demonstrates just how deprived biodiversity is in Scotland, compared to what it once was, and gives scale to the challenge of nature recovery. The latest ranking of 240 countries and territories reports Scotland being 28th from the bottom. Given Scotland's national pride in and global reputation for wild spaces and nature it is important that we show leadership in our approach to nature restoration. We must reach a point where we can legitimately be proud of our natural environment.

The 2023 State of Nature report shows the complete lack of meaningful action taken to mitigate biodiversity loss in Scotland[xliv]. This lack of change, despite us knowing full well the impact we are having on the natural environment and how that affects us, makes apparent the urgent need for statutory nature targets.

We supported Scottish Environment LINK's Fight for Scotland's Nature[xlv] calls for decisive measures to safeguard and enhance our natural environment, emphasising the necessity of establishing legal nature recovery objectives spanning both land and sea.

The restoration of nature is imperative for securing the future of our societies, economies, and the biodiversity itself. This imperative must be urgently prioritised. As a coalition of environmental organisations, we assert a fundamental and moral duty to preserve nature intrinsically. Diverse ecosystems, integral to all life, are indispensable; without them, the survival of life on Earth is untenable. Climate change intensifies the need for resilient ecosystems, a quality they currently lack.

Swift and effective action from decision makers and the public is urgently required to stem biodiversity loss and initiate nature restoration. Setting specific targets becomes a crucial metric for

gauging progress toward this objective. It provides insight into our profound reliance on the natural world and the risks posed to our society and economy if remedial actions are not taken.

Targets play a pivotal role in compelling change across governmental sectors and the economy. While acknowledging the ongoing efforts to address the climate crisis, exemplified by Net Zero targets, a comparable strategy is vital for the nature crisis. Failing to adopt a unified and effective response to the nature emergency could result in a fragmented and inadequate countermeasure, hindering rather than advancing our collective efforts.

The full report (https://www.scotlink.org/publication/report-nature-recovery-targets-statutory-targets-to-drive-the-recovery-of-nature-in-scotland/) and summary report (https://www.scotlink.org/publication/summary-report-nature-recovery-targets-statutory-targets-to-drive-the-recovery-of-nature-in-scotland), prepared for Scottish Environment LINK by Honorary Fellow, Lloyd Austin, explores the background to the concept of such targets, considers the global and regional context into which they will fit, seeks to further the debate about their nature and operation, and makes initial proposals for how such targets might be delivered through forthcoming legislation. As is clear from its content, it does not seek to provide an answer to every question but is offered for wider review and discussion by all relevant stakeholders, and as a contribution to the debate ahead of the formal consultation on this issue. It seeks to explore the legislative options that might be available to implement this commitment, and the policy development that will be necessary to support and implement such a change in the law.

In this report, LINK and its members bodies have set out the features of such targets that should:

- Incorporate a clear date for achievement, and milestones leading to that date;
- Achieve both a reversal of current negative trends and an effective regeneration of biodiversity in relation to past and historic losses;
- Be relevant and specific to the outcome to be achieved;
- Be measurable – to allow clear monitoring and reporting of progress; and
- Be achievable and realistic – especially in relation to means/interim targets to underline and demonstrate the viability of the ultimate objective.

The biodiversity crisis needs to be put on an equal footing to the climate crisis and legally binding targets are a major part of the mindset shift needed. Unlike the climate crisis however, there is not one target figure that can be used for biodiversity. The complexity of biodiversity demands a suite of targets to tackle:

(a) Species abundance; (b) Species distribution; (c) Species extinction risk; (d) Habitat quality and extent; (e) Drivers of biodiversity decline; and (f) Overall integrity, connectivity and resilience of ecosystems.

The actions included in the Scottish Biodiversity Strategy delivery plan must align closely with the statutory nature targets as these will act as a foundation from which long term, meaningful targets can be built upon to achieve the long-term goals of the Strategy.

It is important that these targets are well considered, using best available evidence and expert advice, so that targets are fit for purpose and incentivise the best changes for nature. Without this approach we risk making the situation worse by having little impact or even detrimental impacts if efforts and resources not directed to the right places.

We are pleased to see acknowledgement of the need for biodiversity to be mainstreamed across all levels of government. Such a move will bring the issue to all decision makers and allow for the biodiversity crisis to be better understood and acted on.

We agree that the Natural Environment Bill should provide a framework in which to develop targets on high-level topics. The level of detail needed here must be appropriate to strike a balance between flexibility and scrutiny. We agree that the greater detail of these topics would be best placed in secondary legislation to allow for adaptation as more data are made available and we move toward achieving/ not achieving the targets. However, targets must not be allowed to be weakened through this manner if they are not being met.

The targets need to strike a balance between how much of the target detail will be included in secondary vs primary legislation. It is important that there is sufficient opportunity for parliament and stakeholders to scrutinise the targets.

Please see Scottish Environment LINK report on nature recovery targets and how the Natural Environment (Scotland) Bill might be drafted to introduce such targets on a statutory basis[xlvi].

The Targets Framework

Select and set targets

Question 6b: Do you agree with the criteria set out for the selection of targets?

Yes

We support the criteria set out for the selection of targets.

The targets should build on the actions laid out in the Scottish Biodiversity Strategy delivery plan.

We strongly agree that there is need for targets to regularly reviewed and reported on by an independent body. We believe that the remit of Environmental Standards Scotland could be expanded to include this responsibility.

Targets should include clear dates for their achievement and milestones enroute to those dates. Interim targets and/or milestones should be set – primarily, to enable and require regular monitoring and checks on progress, to ensure that the appropriate actions are being taken and, if necessary, to amend/add new actions if progress is insufficient. This would be similar to the interim targets for the reduction of climate emissions which were set for 2020 and 2030.

Targets need to be specific and relevant, measurable, achievable and realistic, but also ambitious so that meaningful and transformational change can be galvanised.

Form of targets

Question 6c: Do you agree statutory targets should include a combination of outcome targets and output targets?

Yes

This approach follows the recommendations of the LINK report which states that the targets should be a mix of ends and means targets, translating as outcome and output targets[xlvii].

Examples of Potential Target Topics

Question 6d: Is the list of potential target topics sufficiently comprehensive in terms of the focus of proposed target areas and overall scope?

Yes

The suggested target topics aligns with the recommendations of the Scottish Environment LINK report. We have would also like to see more explicit inclusion of the following within the target topics:

- Changing use of land and sea is one of the key drivers of biodiversity loss. It is important that land use change is fully considered within targets associated with mainstreaming nature protection and recovery into agriculture, forestry, game/ deer and upland management, freshwater and marine fisheries, energy generation and extraction activities.
- Climate change mitigation – in relation to mainstreaming policies there must be consideration of targets set by the Climate Change (Scotland) Act 2009 and how these might help achieve nature targets and vice versa. We also suggest targets associated with adaptation and resilience to climate change. This would have strong links to nature-based solutions, tree planting (focus on riparian) and impacts on seabird populations.
- Removal of harmful subsidies must be included in targets for biodiversity investment. There cannot be a system seen to give with one hand and take with the other in relation to supporting biodiversity restoration. This includes agricultural subsidies. There must be provision to align the proposed tiered agricultural support system with the statutory nature targets.

Question 6e: Do you have any other comments on the list of potential target topics?

Yes - We think the suggested examples of target areas encompass appropriate outcome and output targets, which reflects the approach suggested by Scottish Environment LINK's report. We would like to see a distinction made between which targets are output and which are outcome.

Number of Targets

Question 6f: Do you agree with the proposal to have the smallest feasible number of targets which reflects the complexity of nature restoration?

Unsure

There is a risk that the "complexity of nature" will be diminished, especially considering the current lack of robust data. A balance is needed to find the most appropriate number of targets to ensure meaningful, crosscutting and transformative change, while also being manageable and not overwhelming. We would recommend that there is a strong focus on outcome targets as these should galvanise the greatest positive change.

We support the recommended targets in Scottish Environment LINK's report:

Direct species and habitats targets ("ends")

Species Abundance

- Overall species abundance;
- Abundance of species at risk;
- (Optional) abundance of other particularly important species or species group – e.g.,seabird abundance.
- (Additional 'means' target on increasing the number of species for which data is available/decreasing number that are 'data deficient')

Species distribution
- Overall species distribution;
- Distribution of species at risk.

Species Extinction risk
- Targets to reduce number of species at risk of local extinction to zero in the long-term.

Habitat quality and extent
- Extent and quality of priority habitats
- Protected area targets (area covered, and site condition, for both terrestrial and marine sites).

Targets related to conservation action ("means")

Changing use of land and sea
- Targets related to the integration ("mainstreaming") of nature protection/recovery into agriculture, forestry, game/deer and upland management, and fisheries (fresh and marine).

Direct exploitation of organisms
- Targets for population level of species subject to legal killing/capture.
- Targets to reduce the indirect impact on species & habitats (including legal/illegal predator control) as a result of management to increase the numbers of (or access to) target species.
- Targets for the prevention of bycatch.

Climate change
- For mitigation, adopt/cross-refer to targets set by the Climate Change (Scotland) Act 2009, as amended;
- Adaptation/resilience targets (e.g., potentially riparian woodlands/planting, and/or link to seabirds re marine resilience).

Pollution
- Targets to reduce chemical/pesticide use and increase freshwater, seawater and air quality.

Invasive non-native species (INNS)
- Targets to reduce the rate of introduction and establishment of INNS.
- Targets for the eradication/control of INNS, with a priority for islands, and ongoing biosecurity.

Overall integrity, connectivity and resilience of ecosystems

Overall ecological condition
- To further our understanding of and develop a route map to improve BII, leading to the adoption at a later date of BII as a target (as below).
- To improve Scotland's Biodiversity Intactness Index (BII), either in absolute or relative terms.

Timescale for Statutory Targets

Question 6g: Do you agree statutory targets should align with the 2030 and 2045 timescales set out in the Strategy?

Yes – there should be coherence between the targets and the strategy goals to focus efforts.

Reviewing targets

Question 6h: Do you agree the Bill should allow for the review of statutory targets?

Yes

The Bill must include provisions for the review of statutory targets to ensure that targets remain relevant and can be adapted to changing evidence and data availability and the account for the escalating impacts of climate change.

It is very important that this is not taken as an opportunity to weaken targets. We support the suggestion by colleagues in Scottish Environment LINK of the following additional provisions to ensure that the review and adjustment mechanism is proportionate and does not result in an undue weakening of the targets:

- Scottish Ministers should undertake a public consultation on draft regulations to make amendments to the targets.

- When publishing proposed regulations to amend targets, the Scottish Ministers must publish the advice received from the Independent Review Body or other experts, along with a statement of how they have considered the advice received.

The issue of "what happens if the target is missed" is important. These will be statutory or legal targets insofar as they will, subject to the ongoing commitment of the Scottish Government and Parliamentary approval, be set out in legislation (either primary or secondary or both). However, to be effective and useful, that legislation must also set out some form of action or consequence should one or more of the targets be missed.

The nearest (legislative) comparison is the climate change targets and their basis in the Climate Change (Scotland) Act 2009, as amended. Here, if a target is missed, the 'consequence' is simply that "the Scottish Ministers must lay a report before the Scottish Parliament setting out proposals and policies to compensate in future years for the excess emissions" – that is, to set out the action that will be take, in subsequent years, to 'catch-up' and 'get back on track' on the path to net zero.

A similar approach should be adopted in relation to nature recovery targets – and ideally be expanded to require that the report be accompanied by Ministerial statement (and thus cross-questioning from MSPs, and/or scrutiny by a relevant Parliamentary Committee).

Reporting on targets

Question 6i: Do you agree that reporting on targets should align with existing Biodiversity reporting requirements?

Yes

We support the proposal to align targets with the existing Biodiversity reporting requirements. We believe that this would provide consistency and a better focus of resources, avoiding overburdening public bodies with reporting requirements.

The current statutory framework for the Biodiversity Strategy is not fit for purpose as there are no actions set out to deliver the strategy or any reporting mechanisms to monitor how actions have been implemented and whether their aims have been achieved, or to adapt and amend actions.

We agree with the proposal set out by Scottish Environment LINK that the proposal to align reporting requirements provide opportunities to improve the existing framework and that it is a

good opportunity to link the existing biodiversity duty on public bodies to their contribution to the nature restoration targets and the strategy actions.

Independent review body

Question 6j: Do you agree that an Independent Review Body is needed to report on Government's progress in meeting the statutory targets?

Yes

We agree that an Independent Review Body is needed to report on Government's progress in meeting the statutory targets.

The UK Committee on Climate Change has proven vital in tracking progress across the UK and holding Governments to account for the lack of action towards meeting Net-Zero, as well as offering rigorous scientific advice on how to achieve Net-Zero. We would like to see a similar approach applied to reviewing progress to achieving statutory nature targets.

Scottish Environment LINK's report on statutory nature targets examined possible options for the Independent Review Body. Of the options we support the suggestion that Environmental Standards Scotland (ESS) would be best placed to fit this role. Expanding the remit of ESS to provide independent monitoring and advice for meeting the statutory nature targets will require additional capacity and expertise, but we believe it offers the best opportunity for an appropriate advisory body to take on this role.

Section 7 – National Parks

Purpose of National Park Authorities

Question 7a: Do you agree that the purpose of National Park authorities should be amended in order to emphasise the important leadership role that National Park authorities need to play in restoring nature and in mitigating and adapting to climate change?

Yes

We strongly support amending the purpose of National Park authorities to emphasise nature restoration and climate change adaptation and mitigation. National Park authorities must be supported to modernise the goal of National Parks so that to lead nature recovery. We were pleased to see in the latest National Park consultation a proposed focus on nature recovery, not only conservation and enhancement, combined with a focus on a just transition to net-zero carbon emissions. We would strongly suggest strengthening and improving the purpose of National Parks by stating "a just transition to net zero and nature positive". There is massive transition required to move towards nature positive and this will have impacts on ways of life and cultural capital.

The existing National Parks were created over 20 years ago, when there was limited understanding and awareness on the nature and climate emergencies. There is now clear evidence of the crises we are facing and understanding of how to halt, mitigate and adapt to the changes through the ways we use and manage the land and sea. As such it is urgent that goals of National Parks are updated amended to be coherent with the Government's stated aims on nature and climate.

Future and existing National Parks must demonstrate best practice when it comes to meeting net-zero carbon emissions and protecting and restoring biodiversity. They must be at the forefront of efforts to achieve the objectives of the Scottish Biodiversity Strategy, Environment Strategy, Nature

Network and 30x30 commitments and be pivotal in delivering on legally binding targets from the forthcoming Natural Environment Bill.

National Parks need to adopt the Ecosystems-Approach[xlviii] to land management "a strategy for the integrated management of land, water and living resources that promotes conservation and sustainable use in an equitable way". They should be exemplars of best practice, as with National Nature Reserves, and used to encourage those outwith the National Park to follow suit. Lessons learned from the both the Land Use Strategy and Regional Land Use Partnership pilots should be taken into account as well as learning from landscape scale people and ecosystem restoration projects such as Coigach & Assynt Living Landscape[xlix].

National Parks must play a key role in implementing nature networks across Scotland, acting as nodes for the wider restoration and protection of nature across Scotland. They must be seen as taking the lead to improve national connectivity of the natural environment and connection of people to nature. This must be done in a way that is place-based and community led, providing sustainable, nature-based economic opportunities and climate adaptation that improve community resilience.

National Parks should be areas where innovative ideas can be tested that will benefit the natural environment, climate and the local economy. Nature-based solutions should be identified and used wherever possible in National Parks to increase climate mitigation and resilience, and biodiversity in tandem. Large-scale, well-planned nature restoration should be a key focus of National Parks, for example, through the Riverwoods initiative to create a network of riparian woodland and healthy river systems[l]. Species reintroductions should also be led and demonstrated in National Parks.

National Parks can provide means for innovation and opportunities for nature-based investments with Park Authorities working with communities and Nature Scot to ensure positive impacts on nature and climate without greenwashing. They should fully embody and apply the Scottish Governments Principles for Responsible Investment[li].

Contribution to protection and restoration of the natural environment should be a main criterion for selection of new National Parks. They need to be areas where nature restoration and protection will be most effective due to existing or future conditions, with effective guidance and sufficient support and input from local communities.

We do not believe this should limit the Scottish Government to selecting a rural, low populated area for a new National Park.

Aim of National Parks

First National Park aim

Question 7b: Do you agree with these suggested changes to the first National Park aim?

Partially agree

We support and appreciate the need to update the aims of National Parks to include greater emphasis on natural assets, biodiversity and ecosystems. We would like to see "natural assets" defined in legislation. How does this differ from "natural resources" included in the Second National Park aim?

Historically, land use change which could now be considered cultural heritage and historical environment assets will have caused biodiversity decline. There may be actions in protecting and enhancing cultural heritage and historic environment assets that do not support the aim of

protecting, restoring and enhancing natural assets, biodiversity and ecosystems. We would like to see cultural heritage and historic environment assets adapt to the biodiversity and climate crises so that they can positively contribute to meeting statutory nature targets and net-zero.

Second National Park aim

Question 7c: do you agree with the suggested change to the second National Park aim?

Agree

However, we would like to see greater clarity in this aim. There will be elements of conflict between the providing maximum benefits for the environment, climate, economy and people.

We support the suggestion of Scottish Environment LINK to include reference to providing for future generations. This would emphasise the need for long-term sustainable management of natural resources in a way that incorporates the benefits for environment, climate, economy and people.

Third National Park aim

Question 7c: do you agree with the suggested change to the third National Park aim?

Partially agree

We fully support the need to promote public understanding of the area's natural assets. Nature literacy could make significant difference to the way people value and use the natural environment and National Parks are well suited to provide this understanding.

We are also fully supportive of the need to focus on inclusion and improved accessibility. It is well known that nature can have significant positive benefits for people's mental and physical wellbeing. It is important that all societal groups have access and feel that the National Parks are places they have a right to so. This will help to tackle health inequality.

We agree that there is a need for sustainable tourism and visitor management but would like to see mention of activities also being environmentally sensitive and encouraged to enhance the natural environment (assets) of the National Park as far as possible to better link with the previous aims.

Fourth National Park aim

Question 7e: Do you agree with the suggested change to the fourth National Park aim?

Unsure

National Parks are well placed as areas to support the green transition and pioneer the targeted move to nature-based jobs and investment in natural capital involving communities and local businesses. However, we fail to see how this updated National Park aim properly covers these points. This aim is little different to the existing aim, so we would encourage development of this aim to be more explicit in its intentions.

The National Park principle

Question 7f: Do you agree that the National Park 'principle' set out in section 9(6) of the 2000 Act should be retained?

Yes

We support retaining the principle meaning that the authority must give greater weight to the protect, restore and enhance the natural assets, biodiversity and ecosystems within the National Park.

Historically, land use change which could now be considered cultural heritage and historical environment assets will have caused biodiversity decline. There may be actions in protecting and enhancing cultural heritage and historic environment assets that do not support the aim of protecting, restoring and enhancing natural assets, biodiversity and ecosystems. We would like to see cultural heritage and historic environment assets adapt to the biodiversity and climate crises so that they can positively contribute to meeting statutory nature targets and net-zero.

Relevance to other public bodies operating within National Parks

Question 7g: Do you agree that public bodies operating within the National Park should have regard to the proposed National Park aims?

Partially agree

We support the need for public bodies to align with the National Park aims so we would like to see stronger language used in this duty on public bodies.

We believe that if public bodies do not operate in ways that support National Park aims, how would we expect private businesses and individuals to do so. It is important that there is a joint effort to achieve these aims, with public bodies demonstrating best practice. Public bodies should go further than having regard to these aims, they must openly support and take action to achieve these aims.

Question 7h: Do you agree that public bodies operating within the National Park should have regard to the National Park principle?

Partially Agree

We support the need for public bodies to align with the National Park principle so we would like to see stronger language used in this duty on public bodies.

Public bodies should go further than having regard to the principle, they must openly support and take action to follow the principle.

Duty on public bodies to support the National Park Plans

Question 7i: Do you agree that the duty on public bodies operating within National Parks should be strengthened so they have an obligation to support and contribute to the implementation of National Park Plans rather than having regard to these plans?

Agree

We agree that the duty on public bodies operating in the National Parks should be strengthened. Public bodies must demonstrate best practice in their operations to support and contribute to the implementation of National Park Plans. As mentioned previously, we believe that if public bodies do not operate in ways that support the National Park, how would we expect private businesses and individuals to do so. They should be leading by example to helping achieve the aims of the National Parks and we would recommend that consideration is given to extend these duties to include landowners in the park that are in receipt of public funding. There should be a link between the allocation of public funding through the Agriculture Bill and the implementation of the National Park Plans for landowners operating within the park.

General powers of National Park Authorities

Question 7j: Do you agree with the proposal that National Park Authorities should be able to enforce byelaw breaches within National Parks by issuing fixed penalty notices rather than referring them to local Procurators Fiscal?

Agree

Byelaws for camping are an unfortunate necessity in Loch Lomond and Trossachs National Park to avoid considerable harm to the environment and local infrastructure. Ideally the attitude of people would be changed through outreach and education, but we appreciate this not always possible or effective. We believe that such byelaws should only be used in extreme circumstances and that employment of more rangers would increase engagement, improve people's attitudes, and promote safeguarding of the National Park biodiversity.

Question 7k: Do you think that any other changes should be made to the general powers of National Park authorities?

We support the proposal by Scottish Environment LINK for an additional amendment to the park plan process where National Park Authorities would be required to set nature recovery targets in the park plan that align with the statutory nature recovery targets

Governance of National Parks

Question 7l: Do you agree with the proposed changes to the governance of National Parks?

Partially agree

We support the need for a diverse membership of the National Park authority boards, but the divide between nominated, elected and appointed individuals does not add up.

Question 7m: Do you have any other comments that you would like to make about the aims, powers and governance of National Parks?

Section 8 – Impact Assessment Part B

We have responded to selected questions in Section 8

Question 8a: Do you think that any of the proposals in Part B, will have any adverse impacts on human rights?

No- the adoption of the proposals in Part B will support our human right to a clean, healthy and sustainable environment. This right is necessary for access to the wider human rights of our access to health and nutritious food, clean water, good health, a safe and secure home…

Island Communities Impact Assessment

Question 8g: Do you think that any of the proposals in Part B, will have any adverse impacts on island communities?

For marine there may be impacts to coastal/island economies and these must be mitigated by ensuring there are procedures in place such as just transition to new practices/areas and by working with fisheries reps from the earliest opportunity to ensure measures are community led.

[i] https://www.scotlink.org/publication/report-nature-recovery-targets-statutory-targets-to-drive-the-recovery-of-nature-in-scotland/

[ii] https://www.coigach-assynt.org/

[iii] https://swt.maps.arcgis.com/apps/mapviewer/index.html?layers=9ade7e6bc22f45bf8c5158162a5037ad

[iv] https://www.gov.scot/publications/applying-ecosystems-approach-land-use-information-note/
[v] https://www.coigach-assynt.org/project/sustainable-deer-management/
[vi] https://www.gov.scot/publications/where-to-plant-trees-to-protect-rivers-under-climate-change/
[vii] https://scottishsquirrels.org.uk/
[viii] https://biosecurityforlife.org.uk/
[ix] https://www.nature.scot/professional-advice/land-and-sea-management/carbon-management/restoring-scotlands-peatlands
[x] https://www.iucn-uk-peatlandprogramme.org/sites/default/files/header-images/IUCN%20Demonstrating%20Success%20Booklet_UK.pdf
[xi] https://www.riverwoods.org.uk/
[xii] https://www.eea.europa.eu/publications/european-marine-litter-assessment#:~:text=Land%2Dbased%20sources%20account%20for,500%20years%20in%20some%20cases.
[xiii] https://www.iucn-uk-peatlandprogramme.org/sites/default/files/2019-07/1%20Definitions%20final%20-%205th%20November%202014.pdf
[xiv] https://www.scotlink.org/publication/report-nature-recovery-targets-statutory-targets-to-drive-the-recovery-of-nature-in-scotland/
[xv] https://www.britishecologicalsociety.org//wp-content/uploads/2022/04/BES_Protected_Areas_Report.pdf
[xvi] https://www.gov.scot/publications/applying-ecosystems-approach-land-use-information-note/
[xvii] https://www.coigach-assynt.org/
[xviii] https://www.riverwoods.org.uk/about/
[xix] https://www.gov.scot/news/promoting-responsible-investment-in-scotlands-natural-assets/
[xx] https://edinburghlivinglandscape.org.uk/project/edinburgh-nature-network/
[xxi] https://www.ecocolife.scot/ecological-coherence#The%20EcoCoLife%20Ecological%20Coherence%20Protocol
[xxii] https://www.ecocolife.scot/node/239
[xxiii] https://www.gov.scot/publications/regional-land-use-partnerships-phase-1-process-evaluation-final-report/pages/5/
[xxiv] https://storymaps.arcgis.com/collections/9e57bb4b3d4c443889392b725ad2ae46?item=3
[xxv] https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52021DC0699
[xxvi] https://www.wwf.org.uk/sites/default/files/2019-04/Impact%20of%20extreme%20weather%20on%20Scottish%20Farmers%202018%20FINAL.pdf
[xxvii] https://scottishwildlifetrust.org.uk/wp-content/uploads/2023/11/Agriculture-and-NbS-Report-Scottish-Willdife-Trust-2023.pdf
[xxviii] https://www.scotlink.org/wp-content/uploads/2020/12/OceanRecoveryPlan_singlePages.pdf
[xxix] https://www.scotlink.org/wp-content/uploads/2022/06/FFA-response-to-Scotlands-FCP-Consultation-updated.pdf
[xxx] https://www.scotlink.org/wp-content/uploads/2023/11/LINK-Consultation-Response_Inshore-fisheries-fleet-Consultation-on-requiring-electronic-tracking-and-monitoring-technology-on-under-12-metre-commercial-fishing-vessels.pdf
[xxxi] https://www.gov.scot/publications/vision-sustainable-aquaculture/
[xxxii] https://www.scotlink.org/wp-content/uploads/2023/09/LINK-Consultation-Response_SeaLice-Assessment-framework-sept-2023-1.pdf
[xxxiii] https://www.orkneyskatetrust.co.uk/
[xxxiv] https://www.gov.scot/publications/report-salmon-interactions-working-group/pages/3/
[xxxv] https://www.futureeconomy.scot/posts/44-is-the-finance-gap-for-nature-really-20bn
[xxxvi] https://www.wildlifetrusts.org/sites/default/files/2023-07/23JUN_Health_Report_Summary_FINAL.pdf
[xxxvii] https://www.gov.scot/publications/assessing-cumulative-cross-sector-economic-benefits-investment-natural-capital-scotland/pages/2/
[xxxviii] https://scottishwildlifetrust.org.uk/wp-content/uploads/2023/11/Agriculture-and-Rural-Communities-Scotland-Bill-committee-call-for-views.pdf

[xxxix] https://scottishwildlifetrust.org.uk/wp-content/uploads/2023/11/Agriculture-and-Rural-Communities-Scotland-Bill-committee-call-for-views.pdf
[xl] https://scottishwildlifetrust.org.uk/our-work/our-projects/living-seas/oceans-of-value/
[xli] https://www.unep.org/resources/report/resource-efficiency-and-climate-change-material-efficiency-strategies-low-carbon?_ga=2.68665751.702679150.1699963030-538735264.1699963030
[xlii] https://www.scotlink.org/wp-content/uploads/2020/05/CE-survey-report-May-2020.pdf
[xliii] https://storymaps.arcgis.com/collections/9e57bb4b3d4c443889392b725ad2ae46?item=3
[xliv] https://stateofnature.org.uk/countries/scotland/
[xlv] https://www.fightforscotlandsnature.scot/
[xlvi] https://www.scotlink.org/publication/report-nature-recovery-targets-statutory-targets-to-drive-the-recovery-of-nature-in-scotland/
[xlvii] https://www.scotlink.org/publication/report-nature-recovery-targets-statutory-targets-to-drive-the-recovery-of-nature-in-scotland/
[xlviii] https://www.gov.scot/publications/applying-ecosystems-approach-land-use-information-note/
[xlix] https://www.coigach-assynt.org/
[l] https://www.riverwoods.org.uk/about/
[li] https://www.gov.scot/news/promoting-responsible-investment-in-scotlands-natural-assets/