



Response to Scottish Government's

Scottish National Adaptation Plan 3: consultation

Scottish Wildlife Trust

26/04/2024

Scottish Wildlife Trust are pleased to see the recognition of the need for a healthy natural environment in adapting to climate change. However more detail is needed on how action will be taken and progress made to ensure Scotland is climate ready as soon as possible.

The Scottish Wildlife Trust welcomes the Scottish Government's draft National Climate Adaptation Plan 3. We are pleased to see the recognition of the intrinsic link between nature and climate and the strong emphasis on nature-based solutions in adapting to the changing climate. With the recent global record-breaking temperatures causing drought and increasing rainfall resulting in devastating flooding it is imperative that the adaptation plan is enacted urgently. We must see nature as an essential part of the approach to mitigate and adapt to climate change, not as a costly luxury.

For the Adaptation Plan to galvanise the changes needed and address interconnected challenges, it must properly integrate and bolster existing policies, most importantly for us the National Planning Framework 4, Scottish Biodiversity Strategy and the National Marine Plan. The Adaptation Plan recognises key plans and policies, but we need to see more information on how the Plan will drive action. The rhetoric already exists but the change is yet to manifest.

Nature networks

The Trust has long been an advocate for nature networks across Scotland's land and sea and we are pleased to see an objective emphasising the importance of landscape scale approaches for nature restoration and climate change resilience and mitigation. Nature networks must be supported by:

- Integrating nature-based solutions into nature networks to help connect protected areas. Riparian habitat is an excellent focal point for connectivity and initiatives such as [Riverwoods](#) can help stimulate community involvement.
- Providing local authorities with the appropriate funding, evidence and training to implement nature networks effectively.
- Joining up with the marine environment, including Marine Protected Areas to increase connectivity between marine habitats and improve spatial marine planning to reduce impacts on vital marine ecosystems.

Nature-based solutions are a long term, sustainable and adaptable approach for dealing with the impacts of climate change. They provide multiple benefits for health, wellbeing, equality and biodiversity. There must be a strong incentive for developers, local governments, businesses, communities and individuals to use these solutions as a first step in adapting to the changing climate.

Public understanding and engagement

The apparent [push against environmental policies](#) demands improved outreach and education to increase public awareness, support and individual action. We are pleased to see an objective on community and individual support. The Adaptation Plan must:

- Improve public understanding of the importance and wider benefits of a climate-ready Scotland.
- Ensure the potential opportunities for individuals and communities adapting to climate change are made plain and accessible, such as demonstrating sustainable green jobs and positive health and wellbeing changes. Nature-based solutions are an excellent way to engage local communities and educate the public on the importance of climate change adaptation.
- Explicitly target engagement with farming, landowner and fishing communities due to their intrinsic link with the natural environment and given the current push back against climate and nature policies.

Locally changing [climate patterns continue to disrupt harvests](#) and negatively [impact pollinator populations](#), while adverse weather events in Europe [escalate import costs and drive food price inflation](#). Agriculture, forestry and fishery sectors must be supported to adapt in a sustainable way, to improve supply chains and diversify. Retailers must also shoulder some of the burden to adapt our food system and encourage and support primary producers to become sustainable. Again, nature-based solutions will provide a way for these businesses to adapt to climate change and improve food security while also benefiting biodiversity.

We must consider our influence to help climate adaptation beyond Scotland. As half of UK food imports originate from [climate vulnerable regions](#), if we ignore the impact of climate change beyond our borders, shortages and price hikes will be unavoidable, exacerbating inequalities at home and abroad. Scotland must participate in knowledge sharing and support the adaptation of regions where we are a key consumer.

Evidence availability

To ensure the most appropriate action is taken to adapt to climate change we must use the best available evidence. While data availability is improving, gaps in our knowledge could prevent the most appropriate action being taken, so ongoing targeted monitoring will be necessary. We support the goal for a transparent adaptation monitoring system, but this must also include improving data collection on the natural environment where we are information poor, such as the marine environment. Without such data we will be unable to accurately assess the impacts of our actions on the natural environment and make positive changes for the future.

Private investment

Private investment will be a necessary means to achieving many of the objectives set out in the Adaptation Plan. Public funding is unable to meet the current need for [climate ready projects](#), and this gap will only widen into the future. Public funding needs to be used strategically to encourage private investment in nature-based solutions for adaptation by:

- improving understanding of the wider benefits,
- mitigating significant risk,
- developing a pipeline of investable projects,
- and demonstrating potential returns through case studies.

The Scottish Government need to better articulate how they will scale-up ethical investments in natural capital to deliver adaptation and other policy priorities. Nature related disclosure requirements of private businesses will increase transparency and encourage investment in adaptation and data sharing. Adaptation should be a standard part of all new market codes and standards. Community led ethical private investment within delivery frameworks linked to landscape scale planning and must be encouraged urgently if we are to take the necessary action to adapt to climate change in Scotland.

Overall, the Scottish Wildlife Trust is pleased to see the change in narrative compared to the 2019-2024 Adaptation Programme. The intrinsic link between climate and nature must be recognised by all and action must be taken that provides multiple benefits for climate adaptation and nature restoration. We are quickly running out of time to be proactive. A concerted effort must be made for a timely and just transition towards a climate ready Scotland.