



Consultation on Scotland's Climate Change Adaptation Programme 2019-2024

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- Individual
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Full name or organisation's name

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Yes

No

Questionnaire Scotland's Climate Change Adaptation Programme 2019-2024

Respondents should take into consideration the information provided in this document alongside any other knowledge or personal experiences that could be relevant. All opinions are welcome.

We ask that you try to answer all the questions in each section, however, if you are unable to answer any question then please feel free to move on to the next.

There is a comments box below each question to allow you to set out your reasoning and provide general comments

Q1. Do you agree with our outcome-based approach to adaptation in Scotland?

(Please tell us why in the comments box.)

Yes

No

Unsure

Scottish Environment LINK¹ members support the outcomes-based approach to adaptation in Scotland and welcome the efforts to align the strategy's goals to the vision and outcomes of the National Performance Framework.

LINK members have supported that Scotland's climate change ambitions should be aligned to the Paris Agreement and therefore aim to limit temperature rise to 1.5°C. As indicated in the consultation document 'temperatures in Scotland have increased in line with global trends. The average temperature over 2008-2017 was around 1 °C warmer than the pre-industrial period.'

In the context of the Climate Change (Emissions Reduction Targets) (Scotland) Bill, LINK members have supported setting an 80% target by 2030 and setting a net zero target for all greenhouse gas (GHG) emissions by 2045².

As such, there is great urgency to ensure that Scotland's GHG emissions reduction targets as well as adaptation strategy provide a clear forward plan for limiting temperature rise to 1.5 degrees. Information on the rationale for selecting this methodology is needed, and whether this is the most effective methodology in relation to impact of the climate adaptation measures, and the urgency of action

¹ Scottish Environment LINK is the forum for Scotland's voluntary environment community, with over 35-member bodies representing a broad spectrum of environmental interests with the common goal of contributing to a more environmentally sustainable society.

² Scottish Environment LINK Parliamentary Briefing (March 2019):

<http://www.scotlink.org/wp/files/documents/LINK-Climate-Change-Bill-Stage1-Debate-Briefing.pdf>

required in relation to limiting temperature rise to 1.5 degrees. It would have been useful for the programme to demonstrate urgency of actions and approach across the six priority risk areas (including risk to natural capital, including terrestrial, coastal, marine and freshwater ecosystems, soils and biodiversity) and where action is needed in the next five years, as indicated in Annex A of the consultation document. Additionally, more clarity is needed within the outcome-based approach, on the relationship between behaviour change and sectoral policies, in terms of what limits there are to the changes that can be made at different levels in relation to the current structures in place, how long will it take for the behaviour changes to be imbedded in relation to urgency of action required within the implementation timeframe of the programme (2019-2024) and what are the likely barriers for these changes to be imbedded?

As indicated in the supplementary [‘Strategic Environmental Assessment Environmental Report’ 2019](#), the draft adaptation programme addresses risks identified in the second CCRA report³ and the report summary for Scotland⁴. It is noted from the consultation document (pg.8), that the findings from the second Independent Assessment will also inform this adaptation programme. As the second Independent Assessment⁵ was published in March 2019, more information is needed on how the findings from this assessment will be imbedded in the final programme.

Considering the compelling evidence made available in the IPCC Special Report on Global Warming of 1.5°C⁶, the outcome-based approach should also reflect recent and emerging evidence including the climate change impacts of temperature rise of 1.5°C as opposed to 2°C. As indicated in the consultation document, ‘even two degrees of warming is associated with severe, pervasive and irreversible impacts for people and the natural environment.’

With just over a decade of reasonable chance to limit warming to 1.5°C, the 2019-2024 timeframe is critical for our efforts to contain climate change and its impacts. It should be made clear that the outcome-based approach is based on a commitment to limiting temperatures to 1.5 degrees.

There are multiple benefits when aiming for 1.5°C temperature limit in adaptation:

- Adaptation needs will be lower at 1.5°C compared to 2°C, and the adaptation synergies will be maximised if temperature rise is limited to 1.5°C
- Adaptation is not just about people being able to adapt, but also about the adaptation of the natural environment. Limiting temperature rise to 1.5°C will reduce climate change risks to ecosystems and reduce the possibility of a temperature ‘overshoot’, and ‘ecosystems are able to retain more of their

³ UK Climate Change Risk Assessment 2017:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/584281/uk-climate-change-risk-assess-2017.pdf

⁴ Scottish Climate Change Adaptation Programme (2016): <https://www.theccc.org.uk/publication/scottish-climate-change-adaptation-programme-an-independent-assessment-for-the-scottish-parliament/>

⁵ Final assessment of Scotland’s first Climate Change Adaptation Programme (2019):

<https://www.theccc.org.uk/publication/final-assessment-of-scotlands-first-climate-change-adaptation-programme/>

⁶IPCC Special Report on Global Warming of 1.5°C: <https://www.ipcc.ch/sr15/>

services to humans'⁶.

We welcome the intention of Government to 'promote co-benefits and integrate adaptation into wider Scottish Government policy development and service delivery. The approach is inherently cross-cutting, engaging sectors that have not yet fully considered climate change adaptation'.

However, it is unclear how climate adaptation goals will be reflected in the individual policy instruments listed in the consultation document, which could in principle contribute to the climate adaptation outcomes envisaged. There is also no information on how those instruments currently do or do not address climate change adaptation. This absence of a clear approach as to how outcomes will be delivered is even more concerning given that the document does not provide an overview of the efficacy or improvements that will be required for different policy instruments such as the Land Use Strategy to deliver towards climate change adaptation.

Q2. Do you agree that a National Forum on Adaptation should be established to facilitate discussion on climate change adaptation? (Please provide details in the comments box below.)

Yes

No

Unsure

LINK members agree that a National Forum on Adaptation should be established to enhance the delivery of climate change adaptation outcomes.

The adaptation strategy should provide more information on the following:

1) Purpose of the forum:

Further clarity is needed on the purpose, composition and role of the National Forum on Adaptation.

As indicated in the Scotland's Climate Change Adaptation Programme (SCCAP) 2019-2024, the National Forum on Adaptation, will be established on the lines of the National Adaptation Committee with the aim of facilitating a discussion on climate change adaptation. Ireland's National Adaptation Committee aids and guides various sectors including local government⁷.

⁷ National Adaptation Framework: Planning for a Climate Resilient Ireland:
<http://www.lse.ac.uk/GranthamInstitute/wp-content/uploads/2018/10/8663.pdf>

It is unclear what the role and function of the Forum will be and whether its actions will contribute to national climate change adaptation goals. More specifically, it is important to clarify whether the Forum will have an advisory role and if so, whether its views will be considered in policy development both in terms of Scotland's climate change adaptation programme and in terms of distinct policies identified as being important to meeting adaptation objectives.

More information is also needed on the scope, influence and impact of any recommendations that will be made by the forum.

It is also unclear how forum members will be selected and whether this will be a forum for stakeholders to raise concerns about the implementation and effectiveness of existing policies.

2) Effectiveness of the forum:

It is recommended for the forum to be effective it should be able to scrutinise and provide input to the climate adaptation programme. It should also be able to provide recommendations to other identified policies that could contribute to climate adaptation goals.

The forum's operations should be transparent, and it should seek input from stakeholders in its deliberations. Its operations should be supported by Government while the forum itself needs to work towards a set of agreed actions. Terms of reference for the operation and goals of this group need to be set from the outset. Its effectiveness and delivery need to be monitored and reviewed. Otherwise the forum risks falling short of its ambition 'to improve both leadership and collaboration'.

3) Forum Governance:

It is unclear whether the forum will report to Government and the relevant Minister and whether the relevant Government officials and/or Minister will be involved in the work of the forum particularly in the context of working towards joint goals for climate change adaptation.

We note that the Irish Committee includes representation including key government sectors and agencies, and local and regional government. A subgroup on governance issues has also been established under the Steering Committee to look at how best to co-ordinate cross cutting issues arising among the relevant sectors⁸. The Forum should also encourage input from other stakeholders as part of its work.

Q3. Do you agree that climate change adaptation behaviours should be included in the Programme?

⁸ Adaptation preparedness scoreboard: Draft country fiche for Ireland:
https://ec.europa.eu/clima/sites/clima/files/consultations/docs/0035/ie_en.pdf

(Please provide details in the comments box below.)

Yes

No

Unsure

LINK members welcome the inclusion of climate change adaptation behaviours into the programme. There are however several issues within the current approach set out in the draft consultation document:

1. Absence of a cohesive methodology within the adaptation behaviours frame:

The SCCAP document is not very clear on the methodological underpinning of this approach. While the evidence that has been used to inform this methodology is demonstrated (public engagement, policy workshops etc.), the approach is not robust as several indicators, such as relationship of actions with regards to timescales, responsibility of adaptation behaviour, and the systemic⁹, cultural and socio-economic¹⁰ barriers to adaptation behaviours are left unaddressed.

For example, in Europe there is already a change in the distribution of commercially important species such as mackerel, cod and herring. Under Outcome 6, however the suggested adaptation behaviours of “try new fish”, not only ignores what influences consumer behaviour¹¹ and attitudes, but also implicitly assumes a positive outcome on the relationship between consumer choice and environmental responsibility¹² as a result.

The adaptation behaviours frame also puts a lot of emphasis on very quick voluntary change on consumer choices and does not refer to any disincentives that can be used to influence consumer behaviours and choices.

There is also no reference as to the expected timeframe by which this behaviour is adapted. However, as the SCCAP consultation draft covers the time between 2019-2024, it is assumed that these behaviours will be adopted by 2024.

While consultation draft suggests ‘where’ consumers need to be, it doesn’t give any indication on ‘how’ they will get there.

⁹ Moser and Ekstrom (2010): A framework to diagnose barriers to climate change adaptation:

<https://www.pnas.org/content/107/51/22026.short>

¹⁰ Masud *et al.* (2017) Adaptation barriers and strategies towards climate change: Challenges in the agricultural sector: Journal of Cleaner Production, Vol; 156, Pg: 698-706

¹¹ Simonson and Rosen (2014): Absolute Value: What Really Influences Customers in the Age of (Nearly) Perfect Information

¹² Wells *et al* (2010): Behaviour and climate change: Consumer perceptions of responsibility, Pg:808-833

<https://www.tandfonline.com/doi/abs/10.1080/0267257X.2010.500136>

LINK members observe that allocating responsibility to just consumer choices, with no set timeframe cannot be considered a robust adaptation strategy.

It is recommended that the outcomes around climate change adaptation on consumer attitudes, behaviours and choices, are evidence based, as opposed to assumptions.

It is recommended that an evidence-based approach, and enhanced government decision making should be imbedded in climate adaptation behaviours frame as well.

2. Absence of relationship between scale and impact of adaptation behaviours:

The suggested individual behaviours seem very superficial and are not reflective of the scale and urgency of action required in response to climate change.

While the methodology for the SCCAP document states that it is an outcome-based approach, the relationship between the scale and resulting impact of the climate change adaptation behaviours is neither causal nor 'optimal'.

For example, under Outcome 5: "our natural environment is valued, enjoyed, protected and enhanced and has increased resilience to climate change", within the sub-outcome "Scotland's biodiversity, ecosystems and landscapes are adaptable to the changing climate", suggested adaptation behaviours are "check the weather forecast regularly and always be prepared", "get involved in gardening". The question is what value these actions provide and whether it is such actions that need to be prioritised given the risks to our natural environment.

It is recommended, actions that drive ecological improvements should be considered, such as:

- More native trees are planted, which will thereby increase the understanding and value of native woodland amongst communities.
- Consumers make informed purchasing decisions, by buying plants grown in the UK. Consumers can be supported in making those choices through making the information on plants more accessible, via labelling.
- Consumers purchase more local produce. The consumers can be encouraged and supported to make informed choices through the Good Food Nation Bill.
- At the organisational level, encourage business investment in ecosystem or habitat restoration (e.g. saltmarsh, seagrass), through the introduction of sustainable financing schemes.

3. Absence of clarity on scope of adaptation behaviour change:

Behaviour change to support climate change adaptation goals should not be targeted to consumers only. The example provided on pg.11 illustrates the above where 'changing ploughing practices on farms to reduce soil erosion' only puts the responsibility of that change on farmers and land managers. As such behaviour change is also something that different stakeholders will need to adopt. It is

therefore important to determine and demonstrate what actions are needed to effect that change and whether the mechanisms for making the change are voluntary or require regulation.

Q4. Do you agree that an integrated approach should be taken to monitoring and evaluation?

(Please provide details in the comments box below.)

Yes

No

Unsure

LINK members agree that the monitoring and evaluation framework should be integrated into SCCAP.

LINK support the establishment of a Governance Body, for monitoring progress and improving policy design and implementation. We however have concerns on the structure and composition of the Governance Body. With nearly the whole of the Governance Body being composed of Scottish Government officials and just one non- Scottish Government representative, it is unclear how the body will operate in an independent way along with challenging policy performance. It is particularly unclear how the body will ensure that the Government 'remains on track towards delivering our outcomes'. By creating a body composed primarily of civil servants it is unclear how robust advice will be provided to Ministers.

There should be a clear requirement for the body to seek and consider evidence in its work and recommendations.

It should establish in a transparent and inclusive way terms of reference, a work programme and publish information including detailed meeting minutes and documents for discussion.

To enhance scrutiny, the Environment, Climate Change, and Land Reform (ECCLR) Committee of the Scottish Parliament, should be given an opportunity to scrutinise the report produced by the Governance Body.

LINK members recommend that the Government puts forward an open and transparent approach for developing the monitoring and evaluation methodology as well as indicators. While indicators need to measure adaptation targets, it is important for the framework to consider the effectiveness and value of existing monitoring. The approach taken to review the indicators of the National

Performance Framework could be used as a model for developing this framework.

Q5. Do you agree with our long-term vision for adapting to climate change in Scotland?

(Please tell us why in the comments box below.)

Yes

No

Unsure

LINK members agree with the Scottish Government's long-term vision and recommend the inclusion of the word "healthy" before "climate ready, adaptable, and resilient to climate change."

However, we note that the long-term vision needs to be supported by clear prioritisation, a set of actions and timeframe for their delivery.

By not providing an analysis and review of how effective the policies included in the outcomes are, in contributing to climate change adaptation, the strategy will lack the necessary focus and impetus to deliver urgent change commensurate with the challenge of climate breakdown.

Q6. Does the Programme identify the right outcomes for Scotland over the next five years?

(Please provide details in the comments box below.)

Yes

No

Unsure

As the draft consultation document suggests the programme is "not set in stone" for the next five years, and Government adaptation action must respond to emerging research. Already, the document should reflect the evidence highlighted within the IPCC Special Report on Global Warming of 1.5°C⁶.

As suggested earlier adaptation is not just about responding to the impacts of climate change but is also about building resilience to those impacts. Ecosystem based approaches to climate change adaptation will increase resilience to climate change and reduce vulnerability¹³.

¹³ International Union for Conservation of Nature: Ecosystem Management: Ecosystem based approaches to climate change adaptation: <https://www.iucn.org/theme/ecosystem-management/our-work/ecosystem-based-approaches-climate-change-adaptation>

Q7. Are there any additional policies that should be included in the outcomes?

(Please provide details in the comments box below.)

Yes

No

Unsure

LINK members feel that the climate change adaptation programme falls short on the following fronts:

1) Absence of direction to climate change adaptation programme:

The programme in terms of driving adaptation is informed by other policy instruments, instead of spearheading new adaptation policies. While it is noted that the policies and proposals listed within the programme have cross-cutting themes delivering more than one outcome, the programme merely “draws together existing Scottish Government policies relating to adaptation”. There is also an absence of Scotland’s Climate Change Adaptation programme to be “forward looking” in line with the outcome-based approach, as no explicit relationship of climate adaptation action has been established in relation to the climate risks as identified by the UKCCRA, as indicated in Annex A of the document.

2) Absence of implementation detail within different policy areas:

Within the draft programme, policies that are deemed to contribute to climate change adaptation goals and are vehicles for delivering change are listed at high levels with short descriptions.

Within the policy descriptions there is no information on related adaptation actions, their effectiveness and information on whether the actions deliver adaptation for sectors, ecosystems or communities. For example, the Land Use Strategy (LUS) is referenced and the requirement under the LUS to ‘encourage the development of place-based partnerships for delivering integrated and sustainable land use at a local, catchment or landscape scale’ mentioned. However, there is no reference to the fact that this has not progressed. Similarly, the initiative ‘Farming for a Better Climate’ is referenced, but again no information regarding its scope and impact to deliver change is mentioned.

3) Additional relevant policies to be included:

LINK members recommend the following policy enhancements and inclusions:

A. Outcome 5 (natural environment):

While the reference to protected areas is very welcome, as designated sites when well-managed are instrumental in effectively managing sites of nature and restore and protect biodiversity conditions, **the document does not refer to the introduction of a National Ecological Network**. LINK members agree that one critical way of enhancing ecosystem resilience outside of protected areas is through the creation of a National Ecological Network, as set out by Scotland's Biodiversity 2020 Route Map¹⁴. The introduction of a National Ecological Network should be a core component of Scotland's climate change adaptation programme particularly in the context of addressing risks to our natural environment, identified as a priority in the 2017 UK Climate Change Risk Assessment.

A National Ecological Network would help with the identification of priority areas for action on habitat restoration, creation and protection. Our natural environment's health and resilience will be enhanced when it is functioning effectively, through the improvement and restoration of habitats, and it will also offer climate resilience to urban and rural communities such as flood attenuation.

The evidence from the recent joint LINK – WWF Scotland 'Scotland's Nature on Red Alert' report¹⁵, indicates that our ecosystems, habitats and species in Scotland are facing increasingly challenging pressures from climate change. Scientific evidence suggests that our natural environment's ability to sequester carbon will peak around 2030 and could result in with ecosystem disruption, through drought, disease and floods. The time frame of action within the programme of 2019- 2024, is critical as that new actions that could increase adaptative capacity of biodiversity in Scotland to identified climate change impacts should be included in this current version of the programme.

B. Outcome 6 (coastal and marine environment):

LINK members welcome enhancement of marine environment, however like the EU Marine Strategy Framework Directive programme of measures, the climate adaptation programme relies on existing legislation and policy to deliver the outcome.

LINK members make the following recommendations:

- The Scottish Government has established a **Blue Carbon** Forum and a programme for research into Blue Carbon habitats through the Climate Change Plan, however the current programme does not consider blue carbon and the potential for habitat conservation to improve resilience to climate change. Disturbance of carbon stores causing release of stored carbon must be prevented through conservation measures. LINK members recommend that marine policies within the programme should consider the protection of blue carbon habitats.
- Within the policy areas of **Marine Protected Areas (MPAs) Network**

¹⁴ LINK Parliamentary Briefing (2019): Climate Change (Emission Reduction Targets) (Scotland) Bill Stage 1 Debate Briefing <http://www.scotlink.org/wp/files/documents/LINK-Climate-Change-Bill-Stage1-Debate-Briefing.pdf>

¹⁵ Scottish Environment LINK and WWF Scotland (2019): Scotland's Nature on Red Alert : http://www.scotlink.org/wp/files/documents/Scotlands_Nature_Red_Alert.pdf

and Monitoring Strategy, the programme indicates that “approximately 22% of Scotland’s seas are covered by the Marine Protected Areas network”. Furthermore, it is suggested that the network aims to maintain or enhance marine biodiversity. LINK members enquire how effective is the protection currently offered by the MPA network, given that network doesn't yet have statutory fisheries management measures in place?

- The National Marine Plan considers climate adaptation within its general and sectoral policies. However, there is no reference to **Regional Marine Planning** in marine climate adaptation within the current programme.
- Additional initiatives to protect key marine habitats and species must also be considered as key adaptation measures. For example, under Outcome 6, the adaptation behaviour just mentions “reduce plastic consumption”, initiatives such as “Fishing for litter”¹⁶ need to be taken into consideration.

C. Absence of consideration of current adaptive capacity¹⁷ of sectors:

The current programme does not illustrate the current coping capacity of our economic and natural systems, and therefore does not give an accurate picture of how further adaptation measures will perform. For example, the Scottish Biodiversity Strategy and Route Map to 2020, are the appropriate policy areas within Outcome 5 (natural environment). However, Scotland is not on track to achieve the 2020 Aichi Targets, most critically the mobilisation of finance for biodiversity conservation is moving away from target^{18,19}, if currently these policy areas are underperforming, the question is without additional or new actions how will they deliver on the said adaptation goals set within the programme? Another example is that of the Scottish Forestry Strategy that has been included in the programme. There is an implicit assumption that this strategy is delivering effectively, which is not the case as highlighted recently within an independent assessment of first SCCAP²⁰. The new Scottish Forestry Strategy does not have an action plan and lacks direction on how priorities will be delivered. For the Scottish Forestry Strategy to deliver Outcome 5, significant targets and resources need to be in place to restore native woodlands.

¹⁶ <http://www.fishingforlitter.org.uk/>

¹⁷ Adaptive capacity refers to the coping capacity of humans and systems to climate effects.

¹⁸ United Kingdom’s 6th National Report to the Convention on Biological Diversity
<http://jncc.defra.gov.uk/page-7731>

¹⁹ Scotland’s Biodiversity Progress to 2020 Aichi Targets Interim Report 2017
<https://www.nature.scot/sites/default/files/2018-05/Aichi%20Report%20Interim%202017.pdf>

²⁰ Committee on Climate Change (2019): First Assessment: The first Scottish Climate Change Adaptation Programme <https://www.theccc.org.uk/publication/final-assessment-of-scotlands-first-climate-change-adaptation-programme/>

Q8. What are your views on the accuracy and scope of the information used to describe the SEA environmental baseline set out in the Environmental Report? (Please give details of additional relevant sources)

(Please tell us why in the comments box.)

Yes

No

Unsure

Any comments

Q9. What are your views on the predicted environmental effects as set out in the Environmental Report?

(Please tell us why in the comments box.)

Yes

No

Unsure

Any comments

Q10. What are your views on the findings of the SEA and the proposals for mitigation and monitoring of the environmental effects set out in the Environmental Report?

(Please tell us why in the comments box.)

Yes

No

Unsure

Following observations are made on the conclusions drawn within the document on pg. (47) of the SEA Environmental Report.

- As indicated in our submission, within the outcome-based methodology there is an absence of an explicit relationship between the goals established and how the climate risks that have been identified by the UKCCRA, will be addressed or reduced. Additionally, some of the recommended adaptation measures within the programme as highlighted in Q2 of the consultation response, do not reflect the urgency of action required within climate adaptation, and do not reflect the significance of the action in relation to climate risk. It is therefore unclear how the assessment has arrived at the conclusion that the high-level outcome-based approach is

likely to have 'significant positive effects on climatic factors'.

- It is noted that the SEA recognises adaptation behaviours vary in scale and scope, however it seems that the programme places a lot of emphasis on positive effects on climatic factors arising from behaviour change. The assumption that behaviour change will bring about positive effects on climatic factors does not take into consideration several arguments which underpin behaviour change, and as indicated in Q3, ignores the distinction between behaviour change for climate change as a social and cultural phenomenon, and behaviour change that places strategic value across different sectors.

Additional Notes:

This consultation response is supported by the following Scottish Environment LINK member organisations:

- Badenoch & Strathspey Conservation Group
- Buglife
- Cairngorms Campaign
- Froglife
- Hebridean Whale and Dolphin Trust
- North East Mountain Trust
- RSPB Scotland
- Royal Zoological Society of Scotland
- Scottish Badgers
- Scottish Geodiversity Forum
- Scottish Wild Land
- Trees for Life
- Whale and Dolphin Conservation
- Woodland Trust Scotland