

## Evidence on the draft Climate Change Plan (RPP3)

### Summary

LINK Marine Group members **welcome the Scottish Government's progress towards establishing the Climate Change Plan (RPP3)**, particularly recognising policies and plans for enhancing forestry and peatland carbon stores.

We are therefore concerned that the draft plan does not include recognition of habitats that serve as **blue carbon stores**.

The Climate Change Plan should therefore:

- Report on progress related to Blue Carbon since the last plan (RPP2) including the National Marine Plan, Marine Protected Areas and other relevant measures
- Reflect existing policies in the National Marine Plan and those proposed for Regional Marine Plans
- Develop a mechanism to account for the degree of protection and enhancement of blue carbon habitats throughout Scotland's seas, using all three pillars of the marine nature conservation strategy.

**This briefing sets out the views of LINK's Marine Group members in response to the publication of the Scottish Government's draft Climate Change Plan (RPP3).**

LINK members note and welcome that RPP2 highlighted the potential carbon sequestration value of Scotland's 'blue carbon' habitats and expressed a need to develop policies and increase scientific understanding on blue carbon for RPP3. However, LINK members are concerned that the draft Climate Change Plan (i.e. RPP3) contained no further mention of blue carbon, and no developments in policies or scientific understanding. This appears to be a considerable oversight.

Scotland's seas contain a diversity of blue carbon habitats. The majority of blue carbon is stored in relatively stable seabed sediments, accumulated over many years. However, some carbon sequestering habitats such as maerl and flame shell beds, which are recognized Priority Marine Features, are sensitive to physical disturbance, and can release carbon back into the atmosphere when damaged or destroyed<sup>4</sup>. Scotland's Marine Atlas<sup>1</sup> documents the widespread concerns and declines in the status of seabed habitats and species, and both Scotland and the UK are party to firm international commitments to reverse declines and help restore marine biodiversity<sup>2</sup>. All three-pillars of the marine nature conservation strategy including: marine planning, Marine Protected Areas (MPAs) and sustainable fisheries management - through protecting and enhancing marine biodiversity also have a crucial role in protecting and enhancing blue carbon stores.

LINK members would like to highlight the following points on the basis of the recently published draft plan focusing on areas where further action is required:

### **1. Report on progress related to blue carbon since RPP2**

Notable efforts have been made since the RPP2 to understand, map and quantify the potential sequestration value of blue carbon stores in Scottish waters; particularly the SNH Commissioned Reports No. 761<sup>3</sup> and No.957<sup>4</sup>

<sup>1</sup> <http://77.68.107.10/MarineAtlas-Complete.pdf>

<sup>2</sup> International Commitments include: the Convention on Biological Diversity (CBD); the World Summit on Sustainable Development (WSSD); the OSPAR convention; the European Marine Strategy Framework Directive (MSFD)

<sup>3</sup> [http://www.snh.org.uk/pdfs/publications/commissioned\\_reports/761.pdf](http://www.snh.org.uk/pdfs/publications/commissioned_reports/761.pdf)

Our understanding of the scale and long term significance of blue carbon stores in Scotland's seas is progressing and this needs to be recognised in the Climate Change Plan.

## 2. Reflect existing policies in the National Marine Plan and those proposed for Regional Marine Plans

Carbon capture and storage and natural carbon sinks for the marine environment are already recognised in other policies.

The National Marine Plan includes reference to blue carbon:

*“reducing human pressure and safeguarding ecosystem services such as natural coastal protection and natural carbon sinks (e.g. seagrass beds, kelp and saltmarsh) should be considered. In some cases, compensatory habitat creation or enhancement may be possible and should be considered as a last resort if significant harm cannot be avoided. **Appropriate proactive opportunities for enhancing natural carbon sinks and allowing natural coastal change where possible should also be considered.**”* Gen 5 Climate Change.

We would particularly highlight our support for the potential for proactive enhancement of natural carbon sinks, rather than just enhancement for habitat compensation reasons. Additionally, the inclusion of Blue Carbon in existing policies also applies at a regional level. Regional Marine Plans (RMPs) should:

- **Identify significant natural carbon sinks** and seek to avoid colocation with potentially damaging activity; then
- **Assess the acceptability of any proposed partial loss or damage to natural carbon sinks (including any compensatory measures) through licensing or management of marine activities, balanced with priorities presented in this Plan and respective regional marine plans.**

Regional Marine Plans should also include ‘Appropriate proactive opportunities for enhancing natural carbon sinks’ as does the National Marine Plan. The Scottish Government has recognised the importance of blue carbon at both a national and regional level. LINK members therefore urge blue carbon to be included in the Climate Change Plan.

## 3. Account for the degree of protection and enhancement of blue carbon habitats throughout Scotland's seas

LINK members support the introduction of the National Marine Plan, significant development in designating and managing the Scottish MPA network and commitments to develop Regional Marine Plans and reform inshore fishing. Many MPAs contain habitats that are known to sequester carbon, including: seagrass meadows, kelp forests, coldwater coral reefs and maerl beds, and potential carbon stores such as horse mussel beds. However, many examples of these habitats also exist outside the existing MPA network which merit protection and potential restoration using other mechanisms such as marine planning.

We therefore welcome the response to PQ **S5W-06640**, stating that *“further research is required to provide credible estimates of the sequestration provided by **blue** carbon across the entirety of Scotland's Seas”* and the commitment from the Environment Secretary that *“As knowledge evolves, marine policies that protect **blue** carbon habitats may be adapted to enhance that protection.”* LINK members look forward to engaging in the work where appropriate and would encourage that it informs the MPA monitoring and management strategy, the MPA network review and development and review of National and Regional Marine Plans.

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<sup>4</sup> [http://www.snh.org.uk/pdfs/publications/commissioned\\_reports/957-lowres.pdf](http://www.snh.org.uk/pdfs/publications/commissioned_reports/957-lowres.pdf)

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.

This written evidence is supported by the following members of the LINK Marine Group:

Marine Conservation Society	Whale and Dolphin Conservation
National Trust for Scotland	WWF Scotland
RSPB Scotland	
Scottish Wildlife Trust	

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