



Scottish Environment LINK  
2 Grosvenor House  
Shore Road  
Perth PH2 8BD

T 01738 630804  
E enquiries@scotlink.org  
W www.scotlink.org

Paul Wheelhouse MSP  
Minister for Environment  
Scottish Government  
St Andrews House  
Regent Road  
Edinburgh EH1 3DG

16 June 2014

Dear Minister,

I write to follow up our meeting, mainly with your officials, of Tuesday, 10<sup>th</sup> June. Thank you for attending briefly during the demands of a busy announcement day.

1. Scotland's marine environment - the route to recovery, or bureaucracy without the benefits?

We reported that our members are very concerned that minimal designation and management arrangements under the Marine (Scotland) Act will have hugely less than the desired effect on ecosystem decline, and that fears, based on an accumulating body of evidence suggest that this is the extent of the ambition of the Scottish Government. We expressed the view that much stronger ambition and vision are needed to ensure that the emerging marine protected area network and marine planning system improve the health and ecological function of Scotland's seas for wildlife and society to benefit.

Officials offered assurances that recovery of the marine environment remains the objective and that, even in MPAs designated for conservation only, recovery is the aim. We explained that if this was the case, the designations should be based on the enhancement requirement of the Act. We explained that we were reviewing and considering very carefully the extent of the legal obligations placed upon Government by the legislation and whether the emerging system would, in law and fact, meet those obligations.

We indicated that, as a consequence of these fears, we would await the announcements as the system is put in place, but that we could not guarantee support for Ministers at these nodal points, and might be left in the uncomfortable position of publicly re-stating our very serious concerns. We regretted that this is the case after 14 years' joint work, during which we have sought to represent the environmental interest in a careful, sensible way. We fully recognise the economic and social importance of our seas and the interests that represent that importance, but believe, at this point in the process, the environmental interest, which appears to be being discarded, must be firmly promoted in the Government's narrative about a collective desire for improvement – the deal secured in the Marine Scotland Act

We were glad that you were able to be present for part of this discussion, and we requested an urgent meeting to discuss this issue further, with yourself and the Cabinet Secretary.

2. Monitoring delivery of SRDP against biodiversity targets SRDP

The SRDP remains one of the very few funded mechanisms to help Scotland work towards achieving the Challenge 2020 biodiversity targets and halting the loss of biodiversity. We discussed the Government's emerging plans to monitor how SRDP is delivering against the Challenge 2020 targets in order to maximise delivery and value for money for the taxpayer, and sought assurances that such monitoring will be a meaningful source of data for the measurement of success – and the development of policy in the future. In particular, we presented our view that the very welcome

Scottish Environment  The voice of Scotland's environment community

Registered Office: 2 Grosvenor House, Shore Road, Perth PH2 8BD. A Scottish Charity under Scottish Charity No: SC000296.  
Scottish Environment LINK is a Scottish Company Limited by guarantee and without a share capital under Company No: SC250899.  
Printed on Paper made from 100% Post-Consumer Waste



commitment to an advisory service for farmers and landowners be adequately funded and backed up with technical expertise.

### 3. The Future of Forestry

We discussed the very gradual developments in the governance arrangements for the land and the natural environment, including forestry, within Scotland, noting parallel developments in other parts of the UK. Officials outlined the process within government and the desire to achieve proper strategic alignment of bodies with responsibilities in this area with shared objectives. We stressed the importance we attach to any Scottish proposals being the subject of full, open public consultation, as discussed with Mr Lochhead a year ago. We were assured of your continuing interest in stakeholder views and we will keep in touch over this.

### 4. Information items

- Long-term environmental considerations relating to Scotland's future energy strategy

We informed the meeting that LINK hopes to publish a report on the serious problems threatened by the gulf between the IPCC's report on the climatic effects of fossil fuel usage and the capitalisation of our energy corporates based upon known reserves of fossil fuels. We are looking at Scotland's approach to this 'carbon bubble' and levels of preparation for the threat.

- Update on LINK's hilltracks campaign

The meeting discussed recent publicity surrounding the issue of whether hill tracks should come under planning control. We noted the imminence of the announcements of NPF3 and SPP and hoped that Ministers would ensure these contain an all-Scotland solution to this problem, which we believe from the evidence, is not limited to designated areas such as National Parks, and is a substantive matter of justice and democracy which Scotland needs to grasp now for the future. Whilst this is technically a matter for Mr Mackay, the landscape impact of the proliferation of tracks is a matter on which we ask you to consider now.

- Wildlife crime enforcement

We noted our satisfaction with Ministerial statements on wildlife crime, and reported on progress towards our forthcoming report on the enforcement of wildlife crime law. We offered assurances that this will contain recommendations for improvement in all areas where we perceive there to be weaknesses, but in particular in the application of the partnership approach by government.

Finally, we requested an early opportunity to meet with you on the issue of Land Reform in the next few months, in wake of the LRRG report and ahead of Government bringing forward its Bill. The issues are of key in terms of the public interest. We had no opportunity to meet with the LRRG and look forward to an opportunity to hear your thinking and contribute our views.

Thanks to you and your officials for the opportunity of a discussion. We look forward to meeting again in November, at which point we hope you will re-establish our pattern of regular quarterly meetings in the wake of the constitutional focus of this year.

Yours faithfully



Helen Todd  
Vice Chair