

Response to the Environment, Climate Change and Land Reform Committee call for evidence on draft budget 2018-2019

by the Scottish Environment LINK

Date: 3 November



Summary

- LINK members welcome the Committee's approach to seek evidence on the budget in relation to the Scottish Government's 2011 objectives and outcomes, as outlined in the National Performance Framework (NPF). However, we hope that the Committee will be also looking at the overall provisions in the Draft budget for the achievement of government objectives in the areas with which it is concerned.
- With respect to the NPF, as stipulated in a [joint briefing](#) with Oxfam and STUC, LINK members support the use of the NPF as part of our policy making process to ensure that policies adopted are delivering towards our vision of Scotland. Achieving the ambitions of the NPF relies on the ability to collect robust data and report on them in an accurate, transparent and regular manner. As indicated below, shortcomings have been identified with respect to the ability to report on critical indicators relevant to biodiversity and the marine environment.
- LINK members also welcome the Scottish Government's commitment to review NPF outcomes in line with the UN Sustainable Development Goals (UN SDG). The submission below has been prepared with those points in mind and how they relate to the Draft Budget:
 - 1) LINK members note with great concern the continued decline of budgets for agencies such as SNH as well as relevant funding streams particularly with respect to budget dedicated to site condition monitoring and the management of protected sites. This is seriously compromising Scotland's ambition to "protect and enhance [our natural environment] for future generations", a stated National Performance Framework outcome and UN SDG commitment. As such, LINK members request that the Budget 2018/2019 reverses this trend and that efforts are made to secure adequate funding for halting biodiversity loss ahead of the 2020 Aichi Biodiversity Targets milestone.
 - 2) LINK members seek reassurances that Marine Scotland and statutory bodies are adequately funded to meet the legal requirements of the Marine (Scotland) Act 2010 and support ecosystem-based implementation through surveying, research, monitoring and reporting particularly, with respect to the introduction and management of Marine Protected Areas (MPAs). The Marine Act requires the sustainable development and, where appropriate, enhancement of the health of Scotland's seas; achieving this aim is reliant on a sound scientific basis.
 - 3) Scotland's main research provides deliver excellent research but improvements can be made to maintain this much-needed trans-disciplinary approach as well as develop research that responds to policy questions. A gap in terms of research expertise is identified when it comes to biodiversity, ecosystem health and services.
 - 4) With the forthcoming Climate Bill and increasingly challenging emissions reduction targets, the role of statutory bodies in delivering climate policies is likely to come under scrutiny. There are opportunities in particular to strengthen SEPA's role in delivering emissions reductions through development planning.

This will require the resourcing of robust research to support delivery, both directly by statutory bodies and by supportive and advisory bodies like ClimateXChange and the Committee on Climate Change.

Introduction

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.

LINK members welcome the opportunity to respond to the Committee's call for written evidence as part of its consideration of the Scottish Government's Draft Budget 2018-19. While the focus of the call for evidence is the outcomes of the spending on research and the extent to which these outcomes have met the Scottish Government's national objectives, LINK members consider it is important to convey some broader points with respect to the 2011 Scottish Government national objectives as outlined in the National Performance Framework. This is particularly relevant not only in terms of the adoption of the Draft Budget but also in the context of the ongoing review of the outcomes of the National Performance Framework to align them fully with the UN Sustainable Development Goals.

1) There is a strong need to reverse the decline and increase the budget for delivering on our biodiversity commitments, particularly with respect to site condition monitoring and the management of protected sites.

As previously highlighted, "the latest State of Nature Report (2016) shows that Scotland's biodiversity recovery is flat-lining"¹. According to the State of Nature Report, which combines the knowledge and expertise of a plethora of environmental organisations, out of the nearly 6,000 species known to occur in Scotland that have been assessed using modern Red List criteria, 520 (9%) are at risk of extinction from Great Britain².

What is more, this is not an isolated trend. The same is observed with respect to protected areas: despite the protected nature sites national indicator having passed an 80% threshold in 2016, the proportion of natural designated features assessed as favourable under Site Condition Monitoring was 66.6% in 2016; in 2009, it was 67.4%³. There are therefore significant issues with how the data is reported under the national indicator. Specifically, an increased proportion of 'unfavourable' features are re-categorised as 'unfavourable recovering due to management' and are therefore summarised as favourable under the indicator, without evidence of actual recovery or delivery of management measures on the ground.⁴

We understand that the proportion of features reported as favourable has declined since the last official statistic was published in March 2017, from 80.3% to the borderline of 80%, due to various management measures being

¹ http://www.parliament.scot/S5_Environment/Inquiries/004_20161102_RSPB_Scotland.pdf

² https://www.rspb.org.uk/Images/StateOfNature2016_Scotland_1%20Sept%20pages_tcm9-424988.pdf

³ <https://www.snh.scot/sites/default/files/2017-09/Official%20Statistics%20-%20Protected%20sites%20-%20proportion%20in%20favourable%20condition%202016.pdf>

⁴ https://www.rspb.org.uk/Images/Pressures%20affecting%20conservation%20status%20of%20designated%20natural%20features%20in%20Scotland_tcm9-419296.pdf

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found insufficient to bring features into favourable condition. Additionally, despite the 80% target being reached in 2016, the original target of achieve 95% of protected natural features in favourable condition by 2010 was missed and subsequently dropped by Scottish Government demonstrating declining ambition to continue to improve the condition of protected areas across Scotland.

This clearly illustrates that substantially more effort is needed - than what might be surmised from the indicator - to monitor and manage designated natural features to improve the condition of protected areas.

Given that around a fifth of designated natural features consistently remain in unfavourable condition in Scotland⁵, LINK members are extremely concerned that budget to Maintain and Improve Natural Feature Condition has substantially declined. Under the Scottish Rural Development Programme (SRDP) spend on protected areas, excluding 2016 management payments under the Agri-Environment Climate Scheme, decreased by 46% between 2012 and 2016.⁶ Spend on Scottish Natural Heritage (SNH) management agreements declined by 49% over the same period.⁷ Site Condition Monitoring has also seen substantial consecutive cuts to its annual spend over its three monitoring cycles. It has become apparent that SNH were unable to afford surveying some particular features during the current cycle, due to expensive tenders.

These difficult economic circumstances have been a key driver of the proposals put forward by the Protected Areas 2020 Project, led by SNH, which is examining how protected areas can be better aligned with the Scottish Biodiversity Strategy. One option being proposed is to apply an ecosystems approach to the monitoring and management of designated sites. Scottish Environment LINK members have already raised substantial concerns with SNH that these proposals could seriously weaken the protections afforded to priority species and habitats and overall lead to a decline in protected areas condition.

What is more, funding for delivering on biodiversity commitments needs to be secured. NGOs currently working on delivering aspects of the Scottish Government's biodiversity strategy through SNH grants have been informed that "framework" grant structures will be amended as of 2018. SNH's framework grants have been in place for over a decade and have allowed strategic partnerships with Scottish NGOs. As of 2018, these grants will be replaced by three challenges funds focusing on (i) outdoor learning, (ii) invasive non-native species control and (iii) data. While the specific focus of these three funds is at the moment unclear, there is a notable lack of funding support for biodiversity in general and the delivery of mechanisms to halt biodiversity loss.

2) Adequate and continued long-term investment in monitoring and research of the natural marine environment is of paramount importance to achieve Scotland's national outcomes and meet Marine Act goals.

Development of an ecologically coherent marine protected area network, including the Marine Monitoring Strategy needs to be better resourced if we are to meet the conservation and recovery objectives of the Marine (Scotland) Act 2010. The Act requires the sustainable development and, where appropriate, enhancement of the health of Scotland's seas. To do so effectively, it needs to start from a solid scientific basis of what the environmental limits of our seas are. This is in line with the thinking underpinning the NPF.

⁵https://www.rspb.org.uk/Images/Pressures%20affecting%20conservation%20status%20of%20designated%20natural%20features%20in%20Scotland_tcm9-419296.pdf

⁶ Parliamentary Question S5W-09586:

<http://www.parliament.scot/parliamentarybusiness/28877.aspx?SearchType=Simple&Keyword=To%20ask%20the%20Scottish%20Government%20what%20the%20budget%20for%20improving%20the%20condition%20of%20natural%20features%20has%20been%20in%20each%20year%20since%202012&ExactPhrase=True&DateChoice=0&SortBy=DateSubmitted&ResultsPerPage=10>

⁷ Parliamentary Question S5W-09586

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The scientific community has made significant progress in developing our understanding of marine ecosystems, their dynamic and complex existence and the hugely important role they play in both supporting marine activities such as tourism, fishing, aquaculture and interacting with sectors such as offshore renewables, shipping and the oil and gas sector.

An up-to-date and scientifically robust evidence base is required to enable the proper integration of these social, economic and environmental issues and resolve competing uses of limited space and resources where they occur. This requirement to balance competing demands is set to increase as all marine related sectors seek to explore and exploit the natural marine environment, not least aquaculture growth and the construction and planned expansion of offshore renewables.

Given that Marine Scotland's statutory duties are various and include conservation, licensing and marine science, frameworks should be maintained or established to ensure open and transparent decision-making as scientific advice will arise from expert scientists within Marine Scotland, in addition to the expert advice received from statutory agencies such as SNH and Scottish Environment Protection Agency (SEPA).

At the same time, it is concerning to note that resources dedicated to Marine Scotland since the implementation of the Marine (Scotland) Act do not reflect the needs of the ambitious and critical tasks ahead. An impressive amount has been achieved by Marine Scotland in recent years with comparatively constrained resources, but there are significant delays arising from these limitations on capacity. For example, a consultation on four nature conservation MPAs to protect some of Scotland's most loved and observed marine species, including whales and basking sharks, has yet to be launched and is now not anticipated until at least 2019, despite SNH providing relevant scientific advice in 2014, that the sites were required to contribute to MPA network coherence.

3) Scotland's main research provides deliver excellent research but improvements can be made to maintain this much-needed trans-disciplinary approach as well as develop research that responds to policy questions. A gap in terms of research expertise is identified when it comes to biodiversity, ecosystem health and services.

The main research providers (MRPs) in Scotland deliver quality science renowned on a national and international scale. These organisations focus their research on long-term, complex issues which require a trans-disciplinary approach. Many of the environmental and societal challenges that Scotland faces requires this transdisciplinary approach. It is, therefore, important that this long-term research continues to receive some stability in funding, through the strategic research programme, and that there is adequate investment in the infrastructure/facilities required to support that science.

The Centres of Expertise which have been established on Animal Health (EPIC), Water Resources (CREW) and ClimateXChange (CxX) have been effective in pooling resources and expertise across the MRPs and Universities to respond to more immediate policy questions. These centres have been more effective at knowledge exchange due to this focus. The absence of a Plant Health Centre of Expertise is a significant gap given the rise in the number of pests and diseases affecting our agricultural, forestry and environmental sectors and the economic and landscape scale impact of these pests and diseases. There is a gap in centres of expertise related to biodiversity, ecosystem health and services - the establishment of such a resource could help address some of the challenges identified in the Scottish Biodiversity Strategy and help inform steps that need to be taken beyond the RouteMap 2020.

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The decline in the contract research funding (CRF) has impacted the ability of Scottish Government and its agencies to respond to immediate policy-related questions, impacting on their ability to respond to sustainable deer management, climate adaptation and land and marine planning. The CRF should be more strongly aligned to supporting the work of the CAMERAS partnership and could be used, if adequately funded, to address the gap in funding long term monitoring and development of a broader suite of ecosystem health indicators.

4) With the forthcoming Climate Bill and increasingly challenging emissions reduction targets, the role of statutory bodies in delivering climate policies is likely to come under scrutiny. In particular, there are opportunities to strengthen SEPA's role in delivering emissions reductions through development planning. This will require the resourcing of robust research to support delivery, both directly by statutory bodies and by supportive and advisory bodies like ClimateXChange and the UK Committee on Climate Change.

With respect to climate change, the Scottish Government is committed to evidence-based climate targets and supporting regulations and policies. In September, the UK Committee on Climate Change published a report on Scotland's climate ambitions⁸ stating that "there have not been significant emission reductions in most sectors outside electricity generation in recent years. More needs to be done, especially in sectors such as transport, agriculture and heat for non-residential buildings in which little progress is currently being made. Otherwise, Scotland's ambitious targets will be at risk". As Scotland develops a set of actions to meet its climate ambitions it will be important to ensure that scientific advice is available and duly considered.

In the context of the forthcoming Climate Bill, there will be a need to review and strengthen how Scottish Government and statutory functions are applied to deliver challenging emissions reduction targets. At the moment, whilst there are statutory duties on public bodies in relation to climate change, there is no lead statutory agency that takes an oversight of climate issues which can lead to gaps in assessment and missed opportunities to maximise emissions reductions. For example, in relation to development proposals, carbon assessments will become increasingly important including an understanding of the impacts of proposals on local or sectoral climate 'envelopes'.

As part of the forthcoming Climate Bill, LINK members hope that the role of SEPA in particular will be strengthened to take a more strategic role in relation to climate change in addition to its current technical and regulatory functions. An example where SEPA could have significantly more impact could be in strengthening its role in assessing and minimising the climate impacts of disruption to deep peat and carbon rich soils, in addition to technical advice on peat, and pursuing strategic opportunities to link development planning with the Scottish Government's peatland restoration objectives in partnership with SNH. Such a strategic role will require to be supported by a strong evidence base in the form of targeted research, both directly by statutory bodies and by supportive bodies such as ClimateXChange.

The role and impact of the UK Committee on Climate Change in delivering research and analysis to support Scottish Government climate policy and delivery of targets should also be considered by the Committee. The Committee is jointly-sponsored and funded by the UK Government, the Scottish Government, the Welsh Assembly Government and the Department of the Environment Northern Ireland.

This submission is supported by the following LINK members:

- Buglife
- Froglife
- Marine Conservation Society

⁸ <https://www.theccc.org.uk/wp-content/uploads/2017/09/Reducing-emissions-in-Scotland-2017-Progress-Report-CCC.pdf>

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