

**LINK Board 22 October 2009****Political Strategy Report****Autumn 2009****1. INTRODUCTION**

This is the second Political Strategy Report to be prepared for the LINK Board and Network. Items where a decision of the Board and Network are requested ***will appear in bold italics***. As per the decision of the Board in March the Report is shorter than the introductory version – and concentrates on our work within the European Union.

**2. ELECTIONS****2(a) European elections**

The European Parliamentary elections were held on Thursday, 4<sup>th</sup> June, 2009 in the UK (and on Sunday 7<sup>th</sup> June in most of the rest of the EU). LINK held a poorly attended but illuminating hustings meeting in Edinburgh. The outcome was a move to the right in party political terms but the Parliament remains with no majority for any one of the political groupings. The UK Conservatives have moved (since the election) from the federalist European Peoples' Party to the new Conservatives & Reformists Group. News stories have featured on the far right credentials of some of their new allies. The next European Parliament elections are to be held in June, 2014. Please see **8(a) Brussels and Beyond** below, for a discussion of how LINK might develop its work in relation to the EU.

**2(b) Westminster elections**

The next Westminster election must be held by June 2010 – at a date to be chosen by the Prime Minister. Speculation as to the date now varies between dates in February (before any budget) and 6<sup>th</sup> May (the date of the local government elections in England and Wales). LINK preparations for the election have been discussed by the Elections Group – and as a result of these discussions, proposals for a **LINK Rolling Manifesto** are to be put to the Board and Network separately. Please see **8(b) Westminster** below, for a discussion of the position the movement might take dependant on the results of the Westminster general election

**2(c) Holyrood elections**

The next elections for Holyrood will be held on Thursday, 5<sup>th</sup> May, 2011. The rolling manifesto is due to be in place by December 2009 and should see LINK ready to engage in the writing of party manifestos. The Chairman has already attended a meeting with the Labour Party concerning their policy intentions.

It is of note that the provisions of the Scotland Act concerning the holding of interim elections have again had an effect, with the threats of the opposition to move votes of no confidence in the Justice Secretary failing to materialise. The first Minister's threats to resign have proved enough to see off attempts to interfere in his choice of Ministers on the basis that the opposition parties cannot see a firm alternative government emerging and none seems to wish for an early election.

## **2(d) Council elections**

The Scottish Parliament has now passed legislation separating elections for Holyrood and the Scottish Councils - in line with Gould Report into the 2007 election problems. The next local council elections will be held in 2012, again in 2017 and then every fourth year in order to achieve a two yearly cycle of full Scottish elections. As per the decision of the March Board and Network meetings the next PSR will focus on our work with local councils, including our involvement in local elections. Local council issues will be covered in the LINK rolling manifesto.

## **3. PARTY RELATIONSHIPS**

### **3(a) Conservatives**

LINK attended the Scottish Conservative and Unionist Party conference held in Perth from 15th to 16th May, 2009. The next Conservative conference is due in June 2010. Relationships with the Conservatives are reasonably cordial and cooperative at present – although there was a lack of engagement within the Climate Change Bill process, there is evidence of growing appreciation of environmental issues amongst other Tory MSPs, but a detectable diminution of the UK leadership's enthusiasm for green issues as a consequence of the recession.

### **3(b) Greens**

The next annual Scottish Green Party conference is to be held in Dumfries from Saturday, 31<sup>st</sup> October to Sunday, 1<sup>st</sup> November, 2009. LINK will be in attendance with a stall with a general theme. Relationships with the Greens are cordial and cooperative at present.

### **3(c) Labour**

The Scottish Labour Party conference is to be held in March 2010, Westminster general election permitting. It is intended that LINK will attend. Relationships with the relevant Labour spokespeople in the Scottish Parliament are cordial and cooperative at present, but relationships with others have proved more difficult, especially in relation to elected Westminster representatives and the issue of energy generation. The Chairman and several LINK members attended a meeting in September to discuss Labour's manifesto preparations.

### **3(d) Liberal Democrats**

LINK attended the Scottish Liberal Democrats' conference held in Perth from Friday, 13<sup>th</sup> to Sunday, 15<sup>th</sup> March, 2009. The date of the Liberal Democrat Autumn Conference is 31<sup>st</sup> October – but they will be dealing with internal, constitutional business and there will be no stands. Their next open conference will be in February/March 2010, election permitting. Relationships with the Liberal Democrats are cordial and cooperative at present – although strains were experienced during the final stage of the Climate Change Bill.

### **3(e) Scottish Nationalists**

LINK attended the Scottish National Party conference held in Glasgow from 17<sup>th</sup> to 18<sup>th</sup> April, 2009 and will attend the Autumn conference is to be held on 15<sup>th</sup> -18th October in the Eden Court Theatre, Inverness with a stall with a general theme. Relationships with the SNP are reasonably cordial and cooperative at present – although tensions requiring careful management have inevitably arisen because of their role as minority Scottish Government.



## **4. SCOTTISH LEGISLATION**

### **4(a) Current Legislation**

The Marine Task Force continue to work exceptionally hard to influence the development of the **Marine (Scotland) Bill**, supported ably by the two LINK project officers. Co-ordination of the Scottish Government executive competences and approach with that of the UK Government is now largely complete and the pre-legislative stage well advanced. The Stage 1 report has been published, with encouraging signs that our ideas have been influential, and draft amendments have been prepared for Stage 2. The Marine Campaign will remain a major priority within LINK's work until the expected passage of the Bill by December 2009/January 2010 – and concern over the uncertainty of the funding of the Marine Campaign has largely been resolved, with LINK pursuing funding for follow-through work to 2013.

Several Task Forces have been working on the preparations for the **Wildlife and Natural Environment (Scotland) Bill** (WNE) through a temporary LINK Bill Group. A LINK submission covering all relevant aspects of the Bill (*inter-alia*, deer, wildlife crime, non-native invasive species, the game laws and upland issues) in the pre-legislative consultation has been made. It is expected that the WNE Bill will be introduced to Parliament in April, 2010 and that Stage 1 will be taken in the RAE Committee after it has completed work on the **Crofting (Scotland) Bill** (which LINK members with crofting interests will be monitoring).

### **4(b) The Legislative Horizon**

The legislative horizon is reasonably clear following the debate on the Government's programme at the start of the Parliamentary year. No LINK priorities for new legislation have been set and no certain information as to proposed Government legislation beyond the 2009/2010 session of Parliament is known.

- The **Finance (Scotland) Bill 2009**, saw no major threats to environmental expenditure or agency budgets.
- Sarah Boyack MSP's **Energy Efficiency and Micro-Generation (Scotland) Bill** has gathered sufficient support to be introduced, however it is expected that due to her success in getting many of the measures placed within the Climate Change Bill it will be withdrawn.
- Early discussion of a possible Member's Bill to tackle the issue of the **bull-dozing of hill tracks** has taken place.
- There will be a hybrid bill on the **Forth Replacement Crossing** that is expected to deal with compulsory purchase orders and local objections to the additional crossing. This is expected to be published before the end of the year.
- There are also vague rumours that there may be a Bill dealing with **environmental law issues**, perhaps in 2011, to tidy up existing legislation. It is worth noting, that even if this doesn't happen, it adds value to LINK including 'asks' on this subject in its own manifesto.

## **5. SCOTTISH ADMINISTRATION**

### **5(a) Current Administrative Issues**

LINK Task Forces are engaged in a vast range of Government consultations and "stakeholder" engagements. The Scottish Government is particularly active in the following fields at present.

- The consolidated **Scottish Planning Policy** document was published by the Scottish Government and the Planning Task Force has submitted critical comments in the



associated consultation exercise. Meetings with officials and Special Advisers have also been pursued. A second consultation on 'Proposed Policy Changes' to the document has been released and LINK will make comments. It is hoped that significant improvements have been made to the remainder of the document.

- The **Pack Inquiry into Future Agricultural Support for Scotland** will make recommendations to the Scottish Government on how financial support to agriculture and rural development can best be tailored to deliver the Scottish Government's purpose of sustainable economic growth. There is a call for evidence by 30 October, a report by Easter 2010 and an interim report by December 2009.
- The Scottish Government has consulted on the consenting process for new **thermal power stations**, and in order to ensure a similar regulatory framework across the UK is holding off publishing guidance until after the UK has issued its own guidance. There is a possibility of consents being given to new coal power generation developments – without adequate inclusion of carbon capture conditions. Guidance is expected to be published by the end of 2009.
- The Scottish Government is consulting on its **zero waste plan**. It is expected that member organisations will contribute with the deadline being 13 November.
- The Scottish Government has, for the first time, published a '**carbon assessment**' of the spending implications in its Budget for 2010. While this is an important advance, there are concerns about the lack of clarity concerning which projects account for their ongoing carbon impacts (it seems spending on salaries is carbon costed to account for subsequent behaviour), and which don't (it seems the increased emissions from new roads are not accounted for). Member organisations have held discussions with Government officials and MSPs and it is expected work on this will be ongoing.
- A LINK Group is developing proposals for the **Sustainable Land Use Strategy** that is a requirement of the Climate Change Act. A report is to be ready by early November for publication at the same time as the Government's "summit" on the issue.
- **The Climate Change (Scotland) Act** was passed before the summer recess. LINK's work was done broadly within the alliance of Stop Climate Chaos Scotland (SCCS). Both LINK and individual member organisations were, it is fair to say, heavily involved in the shaping of the Act, and work now passes on to its implementation. Our follow up to such pieces of legislation is very important; having secured good legislation NGOs should factor in time for advocacy to ensure implementation.
- In the field of **health and the environment** the work of many LINK member bodies interfaces with the health/wellbeing/physical activity agenda. We have recently mapped this (perhaps incompletely – members which have not yet responded are encouraged to). This forms the substance of discussions with SNH, Paths for All, Health Scotland and others such as BTCV about whether there is action LINK could usefully take to support these organisations in promoting the links between environment and health.

## 5(b) Horizon Administrative Issues

Political debate has been dominated by the recession and the papers being published by the Government on the position Scotland might take with independence. LINK representatives held a meeting with officials to discuss the National Conversation on constitutional matters, offering the agreed position that these were of only marginal interest to members. A further meeting with Ministers and officials is to be held.

In the administrative field the following areas are of major and ongoing importance and concern:



- the implementation of the River Basin Management Plans and the Flood Risk Management (Scotland) Act passed by Parliament earlier this year;
- the continuing weak implementation of the Environmental Assessment (Scotland) Act and the SEA regime;
- the implementation of measures for the protection of the marine environment contained in the Marine Bill;
- the operations of the EU's Common Agricultural Policy (including disquieting reviews of its implementation in Scotland);
- the operations of the EU's Common Fisheries Policy (with a particular focus on this year's December European Council negotiations); and
- the possibility of more consents being sought for new coal power generation developments – without adequate inclusion of carbon capture conditions.

There is a strong argument to be made that the concentration of LINK resources on more immediate political and legislative concerns will mean that failures or inadequacies in any of these areas becomes a significant factor on the horizon without proper scrutiny. LINK itself will take decisions in these areas as the rolling manifesto process moves forward. ***Do the Board and Network consider it important to encourage LINK members to prioritise LINK resource usage to add to monitoring of these and other administrative areas?***

## **6. MAJOR SCOTTISH INFRASTRUCTURE AND PLANNING ISSUES**

### **6(a) Current Issues**

The only major and contentious planning decisions we await are on the **Beaully/Denny power line** and the **Aberdeen By-pass**. We are, however, in the midst of the unification of planning guidance (referred to above) – and we have recently seen the Parliamentary scrutiny of the second National Planning Framework (NPF2) containing proposals for several major developments. Additionally, a major application for the development of a luxury golf resort on the south side of Loch Rannoch (formerly Rannoch School) has been objected to by several LINK members (and FCS, SNH and SEPA). Members are also involved in objections to the application for a coal fired power station at **Hunterston**.

### **6(b) Horizon Issues**

Energy developments such as windfarms, marine renewables installations and grid connections are the potential developments most likely to become controversies in the near future. One of the contentions is likely to be landscape, but another is where energy development is proposed on designated sites (such as the Lewis peatlands). LINK may commission work designed to flag to marine planners the value of planning for marine renewables and to identify research needed; a proposal is in prep.

The new NPF process also gives rise to consideration of how LINK and its members might react at a political and campaigning level to individual projects within NPF2 such as contentious transport projects like the new Forth Road Bridge (including the issue of their funding) as they come forward. A related issue is the probable need to challenge the 'exclusion of need/sustainability from future planning inquiries on national priorities'.

## **7. SCOTTISH JUDICIAL ISSUES**

Access to justice in environmental matters, for relevant parties such as communities or eNGOs, remains prohibitively expensive in Scotland. The Board gave consideration to environmental



justice and the comprehensive implementation of Aarhus being a major “ask” of the political parties at the next Holyrood election. A basic briefing on the issue is in preparation as a background document to the rolling manifesto. LINK shall consider and perhaps respond to the recently published Gill Report on civil law reform.

## **8. POLITICAL HORIZON SCAN**

### **8(a) Brussels and Beyond**

#### **Current Issues**

Issues of interest to LINK at present include the following.

- LINK members are closely following the implementation of the **Marine Strategy Framework Directive** and the debate around the **Industrial Emissions Directive** (which has particular importance with regard to CO2 emissions).
- The EU **Common Fisheries Policy** is due for major reform in 2012 – and a Green Paper containing the Commission’s proposals was published in April - they are currently consulting on this (ends 31/12/09). The Scottish government are hosting an international conference on CFP reform in November, are responding directly and via a UK response to the consultation.
- Discussions begin this year for next major opportunity to change the EU **Common Agriculture Policy** for the 2014 budget.
- The accession of the former Soviet Bloc countries altered the dynamics of the EU and led to a general slowing of environmental legislation being developed. Threats to the integrity and strength of existing Directives are also feared at any stage when they are reviewed.

The economic recession has begun to exacerbate the difference between the richer West of the EU and the poorer East. This has become a major factor in the development of the EU’s policies on climate change, particularly in the achievement of a common position for the UN **Copenhagen** Climate Change summit in December 2009. This is unfortunate at a time when the Obama administration in the USA is showing a stronger than expected stance on the issue and **China and India** are showing signs of serious intent to curb the growth in their emissions.

Iceland has lodged an application to join the EU in 2011 alongside **Croatia**. The recent collapse of the Icelandic banks and economy lead to a General Election which brought a pro-EU government to power - and the EU Commission prefers countries to accede to the Treaties in groups rather than singly. Were Iceland to join this might have ramifications for fisheries and marine protection policy. Considerable difficulty might be experienced on route, however, due to domestic opposition and sensitivity over fishing and whaling.

Scotland’s seven MEPs are a very small factor within a Parliament of 785 members. In addition, the Scottish political parties put relatively far less effort into European manifestos and election campaigns than other events in the political calendar. The main manifestos are written at UK and EU-wide levels. Of the major EU institutions the Parliament has been far less influential than the Council of Ministers, the European Commission and the European Court of Justice. The Scottish MEPs tend towards a cooperative approach on Scottish issues in Europe. It might be possible in future to nurture a relationship with them whereby regular contact is geared towards intelligence and contact sharing as much as lobbying. This might move LINK and the Network (together with improved monitoring of the best sources of information on European affairs) towards a more proactive approach to matters European, rather than the reactive, transpositional role that has been our principal involvement in recent years.





## **Paths Into Europe**

Discussing this issue in the first PSR the Board and Network agreed that it would be highly desirable for LINK and its members to take a more proactive approach to European policy development and that in this PSR round we should review our methods of engaging with Europe. Five “paths into Europe” have been identified as ways that LINK and its members can try to influence the EU, and are discussed here. The paths are not mutually exclusive.

**I – Via the Scottish Government:** We can continue to attempt to ensure that the Scottish Government are arguing the best case possible inside UK delegations to the Council of Ministers – and in direct contacts with the EU Commission. The experience of devolution has, thus far, been that this is unlikely to produce high yields as (a) UK Ministers have proved very resistant to thinking and issues arising from the devolved administrations, (b) Scottish Ministers as a whole have often not approached EU Council meetings with the enthusiasm required to make a sustained difference (and have missed many Council meetings where they were entitled to attend) and (c) LINK and its members have not, perhaps, paid as much attention as possible to briefing Ministers before their engagement with the EU.

**II – Via the Scottish Parliament:** LINK presented evidence to the Europe & External Affairs Committee of the Scottish Parliament with regard to the transposition of EU Directives, but the Committee has paid far less attention to how Scotland might take a more proactive stance in EU policy development. It should be noted that Northern Ireland LINK is in the process of organising a major visit to Brussels by Members of the Legislative Assembly (MLAs) and representatives of the eNGOs in order to improve their connections in Brussels and to attempt to stir enthusiasm for a more proactive relationship.

**III – Via the EEB-UK and the UK Government:** LINK is a member of the European Environmental Bureau UK (EEB-UK), the UK branch of the EU-wide NGO that has, in the past, attempted to influence UK Ministers on EU issues. Problems have been experienced, however, including (a) irregular LINK attendance at EEB-UK meetings and a difficulty in making a particularly Scottish voice heard, (b) a general weakness in the performance of the EEB-UK and the dominance of its agenda by the larger environment NGOs with concerns representing largely English interests in areas of devolved policy, and (c) the Westminster Government has proved difficult to influence in matters of European policy and its general policy stance has not always maximised the possible influence of the UK. EEB-UK is lead by the Green Alliance in Westminster and on a recent staff visit to London, we learned of moves to revive EEB-UK (although it has lost several major members in recent months). Wildlife & Countryside Link, despite having what it considers a UK role in relation to certain issues, has not played a particularly active role in the EEB-UK.

**IV – Via the EEB in Brussels:** LINK involvement with the EEB at Brussels level has been very limited (as has that of WCL). On an individual basis, some of the larger LINK members, on the other hand, have operated through their own networks (FOE Europe, WWF Europe, Birdlife Europe) with some success. It should be noted, however, that some tensions between Scottish and UK tiers have been apparent where direct contacts with the European tier have occurred (with the UK tier often jealously guarding its acknowledged role as possessor of the equivalent of “reserved” powers to negotiate at an international level).

**V – Direct to the EU Institutions:** The Council of Ministers is, by its nature, difficult to approach directly, but EU Commission officials have welcomed direct approaches from amongst larger Scottish LINK member organisations in the past in order to gain information, and this has, undoubtedly, contributed to policy development. The Commission has also responded to formal complaints about infractions of Directives and Regulations (although this is reactive as opposed to proactive policy development). Members of the European Parliament (MEPs) have been open to LINK and member organisation advocacy in the past and, although this has



principally been a matter of holding the EU institutions to account, the Parliament has increasingly obtained a greater say in the legislative process, and with the implementation of the Lisbon Treaty imminent, yet more powers shall accrue to MEPs. No information is known as to EEB or WCL attitudes to these direct approaches but it should be noted that, once again, that some tensions between Scottish and UK tiers of LINK member organisations have been apparent where direct contacts with the European tier have occurred (with the UK tier sometimes jealously guarding its acknowledged role as possessor of the equivalent of “reserved” powers).

### Discussion

There is little doubt that LINK and its members have few resources to dedicate to European matters but that the role of the EU in developing environmental policy is hugely important and that our performance in this area should, if possible, be improved. The following recommendations take the limitation on resources into account and, also, reflect the likely effectiveness of any work we do together with the need to work together sensitively with our colleagues at UK and European levels.

### Recommendations

(A) We should use our limited capacity and opportunities to follow any one of the five paths into Europe subject to the following observations.

- (i) At present the Scottish Government shows small inclination to pursue an active role in European policy development, saddled as it is with the limitations of its position under the Scotland Act. This path is one we should use as matter of course, keeping Scottish Ministers and officials informed on our thinking, objectives and initiatives – but without considering it our principal likely route to exercising influence. We should encourage the Scottish Government to engage more fully and confidently in European matters.
- (ii) We should, similarly, brief Scottish Parliamentarians about our views on European subjects, but the principal aim of our contacts with MSPs in this area should be to persuade them to engage more fully and proactively in European policy development. We should monitor carefully the impact of the initiative of our Northern Ireland colleagues in relation to MLAs and Europe.
- (iii) We should continue to operate within the EEB UK, recognising that this route into European policy development is fraught with difficulties and is the longest route (attempting to influence EEB-UK with Scottish subject matter to influence the UK delegations to the Council of Ministers to, in turn, influence EU discussions and decisions). We should encourage our members inside UK organisations to periodically exchange information and best practice in relation to European operations – and to share this with the other LINK members. We should ensure that our representation at EEB-UK meetings becomes more regular.
- (iv) We should investigate the possibility of developing our relationship with the EEB itself – avoiding, if at all possible, involving ourselves in any dispute with the EEB-UK (In some cases such as biodiversity we might be adding strength to a UK call by working with other UK members of the EEB). This is likely to require more vigilance over EEB action on the part of Task Forces and members, and coordination with staff and others (e.g. trustees) active on LINK’s behalf on things European.
- (v) We should consider the possibilities of LINK Task Forces forging, where necessary, contacts and interactions in Brussels with EU Commission officials – and encourage our members, where feasible, to do the same. In doing so we should be careful to avoid conflict with Westminster bodies – stressing the different nature of Scottish policy concerns. We should consider methods of developing relationships with the Scottish MEPs.





In addition to the above recommendations on how to improve our active influence in European matters we must maintain our knowledge of what is happening within the EU. LINK EU monitoring will be reviewed with the aim of finding good sources of accessible information while recognising the limited resources available for this work.

***Do the Board and Network accept these recommendations? If so, how would they propose to pursue the issue?***

#### **8(b) Westminster**

Politics at Westminster is increasingly dominated by speculation as to the date of the next general election. Further to discussion in the last PSR, staff visited WCL (together with Welsh LINK) and Green Alliance in London to consider the potential outcomes of the election and recommend that the Board and Network consider the consequences of (a) a Labour victory, (b) a Conservative victory and (c) a hung Parliament (with either or both of the Liberal Democrats and the SNP holding the balance of power – and possibly other smaller parties).

The London groups are behind Scottish LINK in election preparation but doing some work, based on the top line of most opinion polls, on building their contacts with the Conservative party with an eye to the likelihood of a Tory Westminster government. No thinking had taken place concerning the possibility of a hung Parliament and an extended period of negotiation between parties to form a coalition. They did, however, express great interest in the opportunities this might afford the environment movement – and in the extensive Scots and Welsh experience of coalition negotiations.

***Are the Board and Network prepared to carry on the co-ordination of election efforts with our colleagues in England, Wales and Northern Ireland - and discussions with a view to preparing for all election outcomes?***

Progress continues at Westminster on the **Marine Bill**, due for completion by the end of 2009. The UK Climate Change Act implementation is proceeding. The reaction of Westminster to the final report of the Calman Commission is also largely dependent upon the election result.

The UK government continues to pursue additional nuclear power stations and airport expansion, both of which are likely to cause major debate over environmental concerns. Transport policy in particular has raised doubts over the UK Government's commitment to fighting climate change – although a new Transport Secretary has made encouraging announcements on the development of high speed rail links between London and Scotland.

#### **8(c) Holyrood**

The constitutional debate has dominated at Holyrood with the possibility of a referendum Bill being the principal focus. At the request of the Scottish Government, LINK has held meetings with officials (and a further meeting with Ministers has been arranged) to discuss the National Conversation, but as with our contact with the Calman Commission we have largely succeeded in staying out of the debate and concentrating on environmental stewardship issues. This focus on constitutional issues might well be expected to continue well into 2010 although it remains likely that a referendum bill will be voted down at Stage 1. The focus might change, however, to relationships with Westminster, dependant on the complexion of the next Westminster Parliament and government.

With the Referendum Bill will go the last major SNP minority government legislative proposal, and the light legislative programme of the last two years might be followed by a very light programme in 2010/11. This might produce opportunities for Committees for intensive inquiries into subjects of interest to LINK or legislative scrutiny following the various pieces of freshwater



legislation. The Transport, Industry and Climate Change Committee will be doing an **inquiry into active travel** in the coming months. Several LINK members have offered to give evidence. ***Do the Board and Network wish to consider subjects that might be suggested to the Holyrood Committees for inquiries during a light legislative season?***

#### **8(d) Council Chambers**

Electoral changes introduced at the last elections have meant that Scotland's Councils have been adapting to a system of proportional results and coalitions of parties (and sometimes Independents) in administration being the general rule. Only two of the 32 councils have single party majority administrations. Together with the results of the simultaneous 2007 elections to the Scottish Parliament, which lead to a minority administration at Holyrood, the new pattern of political control has made for major cultural changes. These can be expected to settle down in future years –and as proportionality has had advantages for eNGOs at Holyrood, may well lead to similar opportunities in Scotland's Council chambers in future years.

In their bid to freeze Council Tax, the SNP Government negotiated the "Concordat" with CoSLA and we are now seeing the production of the second series of Single Outcome Agreements (SOAs) prepared by Councils. These are still at an early stage in development – together with the less directive approach operated by the SNP Government. Fears that the environment did not do well under the old system and might do worse under the new, as Councils with less ring-fencing of funds spend more on politically sensitive social and economic programmes, have been voiced. LINK has established a small steering group and commissioned a consultant to examine the implications and opportunities presented by SOAs. The report from this process is expected soon - and the Board and Network have decided that the next PSR should focus on our involvement with local councils.

#### **10. OTHER STRATEGIC ISSUES**

**Constitutional reform** has already been mentioned as an issue of increasing debate inside Scotland. The LINK position has been to insist that it is the quality of the management of our natural and cultural heritage that is important rather than the constitutional mechanisms used to deliver this management. The LINK approach to both the Calman Commission and the National Conversation has been governed by this position.

The **accountability of Government Agencies** at both UK and Scottish levels (such as SEPA, SNH, The Forestry Commission and Historic Scotland) has been discussed at various levels within LINK as an issue of some concern. It has been observed that the Westminster and Scottish Parliaments have rarely called them to answer questions based on their annual reports and that scrutiny of their operations is work that is too often left to overstretched NGOs and a media with rapidly decreasing environmental expertise.

***Are the Board and Network satisfied that such intensive scrutiny might be suggested to Holyrood Committees during the probably light legislative programme up to the 2011 election?***

#### **11. CONCLUSION**

This second PSR contains fewer questions than the first in line with earlier expectations. As agreed it has focused on European issues. Many important areas are covered, however, and large strategic issues have emerged. ***Are there any areas that the Board and Network wish to concentrate on in the next PSR (other than local government issues as agreed)?***

