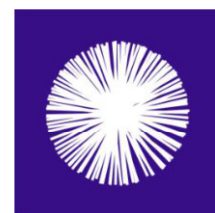**Response to the Scottish Government consultation on**

Climate Ready Scotland: Draft Scottish Climate Change Adaptation Programme

From Scottish Environment LINK
Date: September 2013

Summary of key points

- LINK welcomes the draft Scottish Climate Change Adaptation Programme (SAP), its coherent suite of Objectives for the long-term and the efforts taken to include a large number of policies covering a large range of policy areas.

- LINK is disappointed that the SAP does not outline, more fully, the strategic approach Government has for a Scotland which is resilient and prepared for a changing climate. This should include long-term policies and the principles by which Government and partners will develop measures. Scotland needs to discuss <u>how</u> we will negotiate a path into a new climate, not simply what we will do in the next 5 years.

- Too many of the policies and proposals are vague, lack sufficient, detail, and fail to outline the actions to be taken. This makes it difficult to confidently assess whether SAP Objectives will be met.

- The SAP lacks the urgency of action needed to respond to the impacts of climate change being experienced now, especially by the natural environment. LINK recommends that the SAP includes early and real adaptation action on the ground and a plan to demonstrate it to the public so that people can see what adaptation and resilience to climate change involves.

- Climate adaptation remains a low priority within Government. There is no new money for policies or significant new actions. We recommend that the approach of mainstreaming adaptation across Government is built-on and that climate proofing becomes part of the culture of Government.

Introduction

Scottish Environment LINK is the forum for Scotland's voluntary environment organisations, with over 30 member bodies representing a broad spectrum of environmental interests with the common goal of contributing to a more environmentally sustainable society.

LINK's Climate Adaptation Taskforce comprises a number of LINK members committed to working on adaptation issues. The vision of the Taskforce is that '**The natural environment is enabled to adapt to the impacts of climate change'**. The Taskforce works to influence the policies and work of Government, Statutory Agency and other organisations to ensure this vision is realised.

LINK members welcome the opportunity to comment on the draft Scottish Climate Change Adaptation programme (SAP). LINK has aimed to provide as much detail as possible, on the polices and proposals, in order to support their development. We have not analysed the Society theme due to lack of expertise. Furthermore, comments provided on some policies are fuller and more detailed than others.

General Comments

LINK members welcome the draft SAP and in general welcome the objectives, policies and proposals. LINK welcomes the efforts taken to develop coherent Objectives for the long-term although note that these do not of themselves provide sufficient long-term direction for the Programme and are not fully comprehensive of all known climate risks.

We acknowledge that there is no large tranches of new money within the Government's Budget for climate adaptation objectives. LINK would welcome new money aimed at building the resilience of Scotland's environment in a time when our natural resource base needs to be valued as an important asset. Despite this, we recognise the effort taken by Government and partners to list a considerable number of policies and actions within the SAP and believe that these should move Scotland in the right direction - towards adaptation to the impacts of climate change. However, in this response we provide detailed points of correction, clarification or concern on individual policies. We also have a number of overarching criticisms of the SAP as follows:

Lack of long-term direction

LINK is disappointed that the draft SAP does not outline more fully the long-term vision Government has for a Scotland which is resilient and prepared for a changing climate. This includes outlining the policies and measures that go beyond the 5 years of the Programme and the principles and other measures by which Government should outline long-term direction of policy-making and implementation.

Lack of Urgency

The SAP needs to include more immediate practical actions which will move Scotland more quickly towards implementation of adaptation responses. This is especially important to ensure that sectors provide the

right conditions to help biodiversity and the natural environment to adapt to climate change now. Biodiversity is experiencing the impact of climate change now. We also believe that action is needed now to show to the people of Scotland the reality of climate change and the positive wider benefits of climate adaptation actions.

Overuse of existing policies
LINK is disappointed that on the whole the draft SAP contains few new policies or measures to realise appropriate adaptation responses. Rather it shows elements of existing policies that will be addressed to respond to and address climate threats. This is especially true for the Natural Environment Theme.

Vague actions
LINK believes that too often the policies and proposals in the draft SAP are too vague and provide insufficient detail. We are disappointed that so many of the policies outline work to develop policies and strategies and further research, rather than outlining solid actions. Because of this, it is difficult to determine the likely environmental outcomes of the policies and therefore have full confidence that they will achieve the Objectives. Furthermore, the lack of specificity in the wording of actions and deliverables is unlikely to galvanise Scotland's public and private sector into action.

Adaptation a low priority
LINK is disappointed that, despite the draft SAP publication, climate adaptation remains is a low priority in Government. This is evidenced by there being no new funding for the objective and no major activity to deliver action on the ground. Many of the policies are poorly developed and lacking in detail. In addition, zero publicity of the consultation launch was disappointing because in Scotland there are many positive and innovative adaptation actions to celebrate with the public. We recommend that the publication of the final SAP is used as an opportunity to redress this.

Despite this, the draft SAP shows that effort has been made to start mainstreaming adaptation across Government. We recommend that this approach continues and is built upon, and that 'climate proofing' of Government and partner work becomes part of the culture of Government - ingrained, commonplace and routine. However, to do this we strongly recommend that the SAP outlines the principles by which policies will be developed and long-term Objective will be met.

This response was compiled on behalf of LINK's Climate Adaptation Taskforce and is supported by the following LINK members:

- Association for the Protection of Rural Scotland
- John Muir Trust
- WWF Scotland
- Butterfly Conservation Scotland
- Marine Conservation Society
- Scottish Ornithologists Club
- National Trust for Scotland
- Bumblebee Conservation Trust
- Scottish Wildlife Trust
- Scottish Wild Land Group
- Froglife Trust (Scotland)
- Scottish Badgers
- Plantlife Scotland
- Woodland Trust Scotland
- WWF Scotland
- RSPB Scotland

For more information

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Author: Jim Densham

Date: September 2013

CONSULTATION QUESTIONS

1 Views on the <u>Overarching Framework</u>

1a To what extent does the overarching framework of the Programme outlined in Figure 1 set an appropriate long term direction for climate change adaptation in Scotland?

Fully ☐ Mostly ☐ Partially ✓ Poorly ☐   *Tick <u>one</u> box only*

Comments:

LINK welcomes the overarching aim, themes and objectives as set out in Figure 1. We welcomed the opportunity to help develop these with Government prior to this formal consultation. However, **we believe that this framework is only a small part of what is needed to set long-term direction for climate change adaptation in Scotland**. The framework shows broadly what is being aimed for but not how we will get there – an important element of setting the long-term direction. The Scottish Climate Change Adaptation Programme (SAP) is also focussed on Government action and not directly influencing private sector adaptation and finally it does not fully address how Government itself must change how it functions so that it can more effectively achieve the aim.

We also note that business in Scotland is not covered adequately by the SAP Framework, including energy generation and other services.

Long-term direction
In order to fully set a long-term direction LINK recommends that the SAP outlines the following elements:

Principles
Government is obliged by the Climate Change (Scotland) Act 2009 to include Objectives, Policies and Proposals in the SAP, however, Scotland needs to discuss <u>how</u> we will negotiate a path into a new climate, not simply what we will do in the next 5 years. **LINK believes that the SAP must outline Government's strategic approach to adaptation, including its adaptation principles.** For example, we recommend the approach outlined in LINK's 5 Principles (below).

LINK recommends that five principles are followed during the development of Scotland's
Adaptation Programme:
*1. **Develop knowledge** – of climate impacts and the impacts of our adaptation actions - and then make decisions based on it.*
*2. **Plan strategically** - with a flexible, long-term view and in a joined-up integrated way.*
*3. **Build resilience** – in the infrastructure, systems and environment we currently have.*
*4. **Accommodate and enable change** – so people and wildlife can transition and thrive in new ways and in new places in response to climate changes and impacts.*
5. ***Adapt sustainably** – to avoid maladaptation and detrimental impacts on other elements of the environment.*
http://www.scotlink.org/files/policy/PositionPapers/LINK5_ClimateAdaptPrinciples.pdf

Timescales
The draft SAP is limited to including policies and proposals over the next 5 years only

– in line with the risks identified in the UK Climate Change Risk Assessment 2012 (CCRA). LINK believes that this short-term approach severely limits the effectiveness of Government to achieve the Aim and of preparing Scotland for the future. **It is essential that the SAP outlines long-term policies which will help Scotland adapt and be resilient to a changing climate –** even if the current SAP only highlights actions for the next 5 years.

Scope
Because the SAP is based on addressing CCRA risks it does not provide a holistic view of all Government policies which will be beneficial to Scotland in the future. **LINK recommends that the draft SAP includes all policies which will make Scotland resilient and adaptable in a changing climate.** We recommend that the SAP includes existing policies which aim to improve Scotland's environment and thereby make it more resilient to climate trends and shocks.

In addition, the CCRA does not adequately assess the risk from climate induced extreme weather events. **We therefore recommend that the SAP does more to include policies and measures to prepare Scotland for extreme weather events**.

Urgency
Climate change is causing negative impacts on Scotland's wildlife and environment now[1]. **Scotland must act urgently to prepare our special biodiversity, ecosystems, landscapes, historic environment, culture and wider environment, for the impact of a changing climate**.
We are disappointed that so many of the policies within the SAP outline work to develop policies and strategies and further research, rather than outlining solid actions. We are also frustrated by the vague wording of many listed policies where outcomes are unclear.

We recognise the need for more general environmental monitoring to detect trends, and inform policies - capitalising on the outstanding quality of voluntary sector biodiversity monitoring and citizen science opportunities. However, we believe this is information gathering is different from seeking further information to reduce unknowns and increase confidence of policy effectiveness prior to implementation. We must avoid 'paralysis by analysis' by getting on with action now. We must:
- 'learn by doing';
- seek low-regret and no-regret actions; Furthermore, we must
- implement flexible policies and actions which can change as understanding improves;
- seek early intervention which prevents greater spending at a later date;
- seek multiple benefits from actions.

To make this a reality in the SAP **LINK believes that through the SAP Government must implement pilot projects at a significant scale**, particularly to explore application of the ecosystems approach, and the enhancement of ecosystem resilience. We want to see some of the good examples of adaptation action in Scotland scaled-up and rolled out to more beneficiaries. These examples must become mainstream.

Improving the work of Government
If Scotland is to be resilient to climate impacts Government must also reform how it

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[1] http://www.lwec.org.uk/resources/report-cards

does things. This type of action does not address CCRA risks to Scotland but can help to achieve the long-term aim of the SAP.

We welcome the significant efforts, in developing the SAP, to move away from sectoral approaches and include joined-up objectives. However, LINK believes that the 3 Themes do not adequately cover cross-cutting issues. An example is that the SAP does not adequately cover adaptation for landscapes or historic environment that are not upstanding structures. The dichotomy between the natural and built environment is too stark a difference and does little to emphasise an ecosystems approach where monuments and landscapes are composed of both natural and built elements.

A joined-up approach must become ingrained in Government thinking and therefore we recommend following LINK's 5 Guidelines to ensure that **all sectors** of Scotland's economy and society adapt to climate change in a sustainable and coordinated way, as follows:

    a. **Integrate action**

    b. **Work in partnership with nature**

    c. **Engage with people**

    d. **Develop a flexible adaptive approach**

    e. **Prioritise no-regrets options**

For fuller descriptions of the guidelines go to http://www.scotlink.org/files/policy/PositionPapers/LINK5_ClimateAdaptPrinciples.pdf

We also believe that **Government must commit to routine 'climate-proofing' of all policies** (with respect to both adaptation and mitigation) as they are developed or reviewed, taking account of new knowledge.

Government has a key role of leading and facilitating action on climate adaptation, and developing 'climate literacy' and cultural change. As such more effort is needed on **Awareness Raising** in the SAP. Further comments on this are provided in answer to question 5 (below).

Sustainable adaptation in the private sector

It is inevitable that businesses and individuals will adapt to a changing climate. With the best intentions, without advice and guidance private organisations may not adapt in the most effective or sustainable way. We are disappointed that the draft SAP does not include a business theme. We believe that the public, private and third sector must work in partnership to achieve the best actions and outcomes. Government has the responsibility to ensure that private sector adaptation does not happen in an unsustainable way or have negative indirect impacts. Therefore, we recommend that this is addressed in the final SAP.

1b Does the overarching framework address the current and predicted impacts to Scotland identified in the UK Climate Change Risk Assessment?

Fully ☐ Mostly ✓ Partially ☐ Poorly ☐   *Tick <u>one</u> box only*

Comments:

LINK commends the Scottish Government for corralling the CCRA risks into the overarching Framework in a coherent way. The one group of risks not covered in the framework is those in the CCRA's 'Business and Services' grouping. This is an omission from the draft SAP that should be addressed.

LINK recognises, however that the CCRA itself has failings and omissions, and does not cover all climate risks. For example it does not adequately cover the risks from extreme weather events and it does not directly include risks from sea-level rise. Furthermore, and of most concern to LINK it does not, and cannot, assess the risk from climatic change on all Scotland's many and varied species – all of which may be affected and may respond to the changes in different ways. This is not recognised in the Framework or the SAP and we believe should be as it is important for context.

We believe that even in this inaugural SAP, all UKCCRA risks and other known climate risks outwith the CCRA are included in the SAP and at least assessed and reviewed during the 5 years of the Programme.

2 Views on the <u>Natural Environment</u> Theme

2a Do objectives **N1, N2** and **N3** collectively set an appropriate long term direction to ensure that Scotland's natural environment is able to adapt to our changing climate?

Fully ☐   Mostly ☐   Partially ✓   Poorly ☐   *Tick <u>one</u> box only*

Comments:

For the same reasons as given in answer to question 1a we believe that the Objectives only provide partial long term direction. In addition, we believe strongly that the natural environment theme does not capture all the actions needed nor the type of direction required to achieve the Objective. **We recommend that Government follows and judges policies against the 5 guidelines LINK published for helping the natural environment to adapt to climate change**:

   a. **Improve our understanding of changing marine and terrestrial environments -** through monitoring, and research designed to assess the impacts of climate change, the responses of wildlife and habitats, and the effectiveness of our adaptation measures.
   b. **Reduce pressures not linked to the climate** – that the environment is already struggling to cope with, such as pollution, habitat fragmentation and over-exploitation.
   c. **Build robust wildlife populations** – which will be resilient in the face of an uncertain but changing climate, and have the ability to move through the countryside.
   d. **Identify and manage important wildlife and habitat areas** – to fill in gaps in the existing habitat network and provide new areas fit for wildlife in the future, such as Marine Protected Areas and Sites of Special Scientific Interest (SSSI).
   e. **Deliver conservation action at a landscape scale** – to provide wider areas of the urban, rural and marine environment that are more resilient to change and permeable to wildlife providing diverse environmental, social and

economic benefits. Action at this scale must provide a network of ecologically coherent key habitats which sustain ecological processes and increase connectivity of habitats, surrounded by an environment managed with nature in mind.

Act now with a long term view

More than any other theme, the characteristics of the natural environment shows the need for a **long-term strategic approach** to climate adaptation and the need for **urgent action now**. A particularly useful example is woodland and forestry policy. Trees need to be planted now so that trees and woodlands can provide benefits for the future, such as; timber, fuel, carbon storage, homes for wildlife, shading, flood prevention and recreation. At present, we don't know all the answers about the impacts of the climate on trees, woodland and land in 30-50 years time but because trees take decades to grow and mature we need flexible woodland policy to reflect this. Climate change brings high levels of uncertainty about future trends, and therefore adaptation plans must themselves be adaptive, flexible and responsive to new knowledge. **We strongly recommend that draft SAP policies in the Natural Environment Theme are revised and added to, to include more long-term policies that go beyond the 5 years of the Programme**. Furthermore, **we recommend that where there are long-term-policies in the SAP these are developed and explained to show what real actions will be taken within the next 5 years to implement the policy**.

LINK especially recognises the role that the nature and the wider environment can play in helping Scotland to adapt to climate impacts. The natural environment is our resource base and can provide goods and services to society and natural solutions to some of the challenges we face to living in a changing climate. This is particularly relevant to Objective N3.

Ecological adaptation

A changing climate is the greatest long-term threat to the natural environment. However, due to the multitude of species, historical sites, location-specific habitats and landscapes in Scotland we do not know how each of these will react and respond to the impacts of a changing climate. Neither, will we ever be able to fully gather sufficient data to conclusively make adaptation plans for each**. The complexity of the natural world and Scotland's environment therefore requires the SAP to promote Ecological Adaptation.** Important elements of ecological adaptation are bound up within LINK's 5 Guidelines above but specifically include:

- Enabling species to adapt by increasing the area and diversity of natural and semi-natural habitats is essential.
- A habitat network approach with the aim of increasing resilience and adaptive capacity of ecosystems.   This means valuing designated sites but thinking beyond them by identifying ecologically appropriate zones of opportunity for habitat creation or expansion.
- Research key species and key historic site responses to changing climate.
- Ensure sufficient variation and diversity, to enable adaptation to take place, including genetic variation and landscape diversity.
- Adopt landscape principles and implement landscape-scale projects, particularly to explore application of the ecosystems approach, and the enhancement of ecosystem resilience.

2b To what extent will the policies and proposals listed under objective **N1** provide an appropriate focus for the lifetime of the Programme in order to progress towards the long-term objective?

Fully ☐ Mostly ☐ Partially ✓ Poorly ☐ *Tick <u>one</u> box only*

Comments:

LINK welcomes the significant number of policies included in the SAP aiming to achieve this Objective. In general, the policies and proposals included will be beneficial over the lifetime of the Programme and provide a start towards achieving the long-term aim of the SAP. However, LINK finds that too many of the policies are vague with insufficient detail or clarity as to the outcomes. For some it is unclear what action the policy will deliver and to what timescales, whilst for other policies it is unclear, beyond initial steps, what implementation may occur.

In order for the objective to be met in the 5 year lifetime of the SAP and to progress towards the long-term objective LINK recommends the following changes or additions to the listed policies and proposals:

N1-3 *Undertake research and develop* **better modelling and spatial mapping of risks to evaluate future impacts of climate change on forests.**
LINK welcomes this policy but recommends that it is enhanced with the addition of guidance, advice, support and funding in order to implement the findings. The research must reach beyond the National Forest Estate.

N1-6 *Marine Scotland will use* **marine research strategies and monitoring programmes** *to gather data on the impact climate change is having on the seas....*
We welcome research to better understand the role of blue carbon ecosystems for sequestration (seagrass beds, kelp forests, salt marshes etc) by marine habitats and how MPAs and marine planning can protect them. However, there should also be funding for research into the value of these habitats in protecting inland areas from impacts associated with climate change and also research into restoration of such habitats (akin to peat bog restoration on land) – this is particularly relevant for seagrass beds and saltmarshes which are probably much reduced from historic extent. We also recommend that this work also covers the blue carbon in and the value of biogenic reefs and beds e.g. horsemussels, blue (edible) mussels, native oysters, hard corals (e.g. Lophelia) etc as well as other calcareous habitats such as maerl beds.

Research into the effect of climate change on the distribution of habitats and species should feedback directly into MPA network design and MPA boundary setting to provide individual site boundaries and networks designed to provide greater resilience to the impacts of climate change and to allow for the migration of species populations northwards as sea temperatures warm. Concurrently, site management should also be informed by knowledge of how climate change impacts work antagonistically with other anthropogenic impacts (pollution on-site, fishing, industrial development etc) to effect local species populations and habitat viability. Adequate protection from existing 'manageable' activities could help climate change impacts (e.g. sea temp increase) being the 'straw that breaks the camel's back' for pressurised habitats and species populations that leads to their decline/extinction. All of this provides scope for research.

N1-11 *Continue to fund the* **Strategic Research Portfolio in Rural and Environmental Science***.......*
LINK would like to see this Portfolio integrate historic environment interests. Excellent work has been done between Defra and English Heritage research programme such as Defra's <u>BD1701</u> & <u>1704</u> and the Scottish Government could usefully fund similar integrated work. This is particular important when ecosystem

services are assessed as the Scottish Land Use Strategy is being implemented.

NEW POLICY NEEDED

Review of current ecological data collection, monitoring and use.
We believe there is a significant need to understand key species responses to a changing climate so that action can be taken to support adaptation. To ensure that data collected on species, habitats and ecosystems is sufficient to understand the accelerated changes being seen in the environment and to ensure that the data will help in decision-making we would like to see **a review of the ecological data collected within Scotland**. This review would aim to ensure data is fit for purpose in guiding adaptation responses.

Review of Water Framework Directive (WFD) targets
We believe that there is also a need to understand how climate change is likely to affect the achievement of WFD targets e.g. how it is likely to impact on changes to river flows and consequent effects on pollutant dilution capacity, and many other factors. We recommend that this is included in the SAP.

2c To what extent will the policies and proposals listed under objective **N2** provide an appropriate focus for the lifetime of the Programme in order to progress towards the long-term objective?

Fully ☐ Mostly ☐ Partially ✓ Poorly ☐   *Tick <u>one</u> box only*

Comments:

LINK welcomes the significant number of policies included in the SAP aiming to achieve the Objective. In general, the policies and proposals will be beneficial over the lifetime of the Programme and provide a start towards achieving the long-term aim of the SAP. However, LINK finds that too many of the policies are vague with insufficient detail or clarity as to the outcomes. For some it is unclear what action the policy will deliver and to what timescales, whilst for other policies it is unclear, beyond initial steps, what implementation may occur.

LINK recognises that Objective N2 is the key starting point to ensuring the natural environment is able to adapt to the impacts of climate change. We recommend that the SAP more clearly shows a priority is the **practical delivery of existing environmental policies as a key first step to building resilience in the environment and achieving the aim.** Current pressures on the environment (exacerbated by climate change) are reducing the resilience of species, habitats, ecosystems, historical sites, and landscapes, and limiting the capacity to adapt where appropriate. Therefore, we believe the SAP should clearly show that we are aiming to reduce these pressures and implement existing legislation. Unfortunately too many of the policies listed imply a tweaking of the policy to take account of climate change impacts rather than showing commitment to deliver it.

In order for the objective to be met in the 5 year lifetime of the SAP and to progress towards the long-term objective LINK recommends the following changes or additions to the listed policies and proposals:

N2-1 *Review objectives and priorities for action in Scotland's Wild Deer: a*

National Approach (WDNA)
LINK believes evaluate the effectiveness of voluntary deer management agreements (under the Code of Sustainable Deer Management bought in under WANE Act 2011) in relation to the condition of priority habitats. We would like to see this evaluation guide the use of statutory deer management systems where the voluntary approach is failing to protect the environment, including ensuring the resilience of ecosystems to climate change. (The Code applies to public bodies only, although it can be used as part of the evidence for state intervention to reduce deer numbers under the Deer (Scotland) Act 1996 sections 7 and 8,).

N2-2 *Promote the role of green networks*
We welcome this policy but want to see real action within the 5 years of the SAP to make green networks more common and widespread. However, the term 'green networks' can be interpreted in a variety of ways and therefore needs clarity and definition before policy is implemented.

We also believe that the policy must promote and ensure heterogeneity at the landscape, farm and field scales. There are many uncertainties surrounding future climate scenarios and the detail of how biodiversity and ecosystems will react. In response to this uncertainty, the Scottish Government should focus on the general measures that will support and enhance the diversity of species, habitats and ecosystems even if the exact composition of these is not clear at present. Regulations and incentives must encourage diversity.

N2-4 *Manage designated sites* - *for land based biodiversity.*
LINK recommends that this policy is reworded to show positive intent to improve designated sites – managing these sites is not sufficient. We suggest – '**Optimise the conservation status of existing sites and systems of national and international importance**',

In order to follow the principles of climate adaptation we would also like to see this policy protect current and re-establish lost features which enhance general biodiversity and Ecosystem Services, e.g.:

- Brown-field sites in urban areas;
- Undamaged wetlands, peatlands and clean-water ponds;
- Appropriately grazed montane habitats in the uplands;
- Ancient native woodlands;
- Species rich grasslands and heath;
- Wood pasture sites;
- Bog woodlands;
- Special marine habitats and features.

N2-9 *Implement a Scottish Biodiversity Strategy*
LINK believes that this policy listed in the SAP would be stronger if it make explicit links with N2-6 and N2-2. The research mentioned in N2-9 should focus on the effectiveness or otherwise of these key strategies to deliver the Biodiversity Strategy targets.

N2-11 *Embed climate change adaptation considerations, and potential responses such as Forest Habitat Networks....*
We understand that action to embed this into Woodland and Land Use Strategies has already been taken. As a next step, this policy and action needs to be prioritised. Financial incentives, advice and guidance for landowners and managers are required to increase the core area and connectivity of woods of high conservation value.

A habitat network approach to woodland creation – needs to be implemented with the aim of increasing resilience and adaptive capacity of ecosystems.   This means

valuing designated sites but thinking beyond them by implementing native woodland creation adjacent to woods of high conservation value. Scotland needs to adopt a landscape approach to woodland management.

N2-12 *Improve the condition of native woodlands; promote natural regeneration as a means of increasing resilience to change, and take other steps to increase adaptive capacity in woodlands.*
Improving the condition of existing native woods is a positive action for climate adaptation. This policy must be further developed to outline the actual actions needed to make this a reality.

N2-13 *National Marine Plan (NMP)*
We recognise the important value that both the Marine Protected Area (MPA) network and NMP should have in increasing resilience of the marine environment to climate impacts, such as, sea temperature increase and increased frequency/intensity of storm events.

LINK wants to see timely and full implementation of Marine Act (including MPA network and National Marine Plan), and Birds and Habitats Directive legislation. LINK believes that implementation must include:

- A strong, directive, holistic National Marine Plan taking an ecosystem approach;

- Nature Conservation MPA sites selected for best areas, and those meriting recovery, based only on sound science;

- All developments (including fisheries) meeting environmental assessment responsibilities;

- Effective management of MPA sites – no 'paper parks'.

- Strengthened protection of ecosystems weakened by over-exploitation

- Increased resources for monitoring of marine species and habitats;

- Commitment to target recovery of fish populations to sustainable levels by 2015;

- Commitment for MPAs to 'restore' as well as 'conserve';

- Bold and effective strategy for control of Invasive Non-Native Species;

- Review of management of Natura sites amd adaptive approach to selection/de-selection;

- Objectives for fish species both as biodiversity and as commercial species;

- A change from decision-making approaches which are 'data hungry' affecting the data poor marine environment;

- Objectives to protect, and where appropriate recover and restore marine carbon sinks;

- Natural soft-engineering approaches to protect coastal buildings and infrastructure by;
    - aiming for healthy reefs and kelp forests offshore, and suitable coastal buffers of saltmarsh and shifting sand dunes;
    - where appropriate, managed realignment;

- All coastal development plans following an ecosystem-based approach, whereby development is avoided on natural coastal floodplains.

N2-14 *Regional Marine Planning*
Comments as above (N2-13)
Regional marine *spatial* planning has great scope to reduce pressure on designated areas (whether ncMPA, intertidal SSSI or SAC). However, we believe that Regional Marine Plans should aim to build the resilience of areas which fall below the threshold meriting site designation. There may well be important local habitats of, for example, maerl, seagrass, kelp, blue mussel, saltmarsh, that don't merit ncMPA or SAC protection in themselves but should nonetheless be protected through the regional plans.

N2-15 *Manage designated sites – for the marine environment.*
LINK recommend that this policy is reworded to show positive intent to improve designated sites – managing these sites is not sufficient. We suggest – '**Optimise the conservation status of existing sites and systems of national and international importance**'.

Furthermore, the SAP should recognise that the impacts of climate change should not just be considered for Natura sites but also for SSSIs with intertidal components, Ramsar sites and future nature conservation MPAs (ncMPAS), both the 33 ncMPA proposals being consulted on this summer in full and ncMPA search locations (yet to progress to proposals).

N2-17 *River Basin Management Plans (RBMPs)*
LINK believes that SAP Principles should steer the development of RBMPs and that the Scottish Government must show how RBMPs will be assessed for a future climate.

N2-18 *Flood Risk Management Plans (FRMPs)*
FRMPs are necessary to deliver sustainable flood management and LINK members are involved in the development of these Plans, which will be in place from 2015.
It is critical that climate change adaptation is a key consideration in the appraisal and selection of measures for local FRMPs.

N2-19 *Improve the condition of river* **Special Areas of Conservation as part of River Basin Management Plans**
We believe that this policy should more broadly include all water-dependent Natura sites i.e. SACs and SPAs, not just 'river SACs'.

N2-20 *Assess and manage coasts, promoting adaptive coastal management that works with natural processes*
We welcome this policy. We believe that as part of Scotland's new approach to sustainable flood management, the need for managed realignment of coasts should be assessed and early action promoted. LINK believes that a pilot project should be initiated in an area of need to test and demonstrate how managed realignment can help us adapt to climate change while being positive for the environment and society. Government must clearly set out how natural flood management measures (coastal realignment and other) will be funded.

N2-22 *Support the project **"Future Proofing Scotland's Farming"***
The 'Who will deliver' column in the table should read - Soil Association Scotland, Scottish Government & Quality Meat Scotland.

PROPOSAL
N2-23 *Encourage the consideration of climate change impacts (and how they will be addressed) in Forest Plans*...
The term 'Encourage the consideration of' does not explain what the proposed action

is. We would like to see this proposal contain specific actions or measures. For example, Forest design plans should incorporate explicit requirements for structural variety – edges, clearings, age structures etc., even in commercial plantations.

NEW POLICIES NEEDED

Programme of ecological restoration and biosecurity of islands for breeding seabirds

To fulfil our national and international conservation responsibilities towards seabirds and halt the declines in their populations, Scotland must maximise the resilience of our national breeding populations. A key mechanism for achieving this will be undertaking ecological restoration and biosecurity (preventing further predator introductions) work on current and former seabird islands. This will maximise breeding opportunities across seabirds' ranges and thus maximise their opportunities to exploit prey populations that are changing in distribution and abundance.

Scotland has internationally important seabird populations but, overall, mean breeding seabird abundance declined by 53% between 1986 and 2011, with breeding productivity falling by 37% over the same period. This widespread suppression of breeding populations and success is linked to reduced availability of the principal fish prey species, notably sandeels *Ammodytes* spp. Published science links this problem with large-scale reductions in zoo plankton biomass and changes species composition – linked, in turn, to recent rises in sea surface temperature in the NE Atlantic and North Sea. Climate change-related pressures on breeding seabirds are known to operate together with additional pressures – for example, human sandeel fisheries – to reduce seabird abundance and breeding success.

Seabirds are constrained to breed on land and their colonies are strongly – sometimes exclusively – associated with predator free islands. This key breeding habitat has a highly restricted distribution, and one that has been greatly reduced in the past 3 centuries due to human introductions of predators (rats, cats etc.) onto seabird islands.

EXISTING GOVERNMENT POLICIES WHICH SHOULD BE INCLUDED

Peatland restoration policy

We believe that the SAP should include Scottish Government's Policy on Peatland Restoration. This policy is an important element of the Report on Policies and Proposals (RPP2) published in June 2013. Government has already committed £1.7m to fund restoration in 2014-15. Restoration is recognised as being beneficial for climate change mitigation and adaptation.

Peatland restoration proposal

For the same reasons as the above, we recommend that the SAP includes the Scottish Government's proposal to restore 21,000ha of peatland per year. LINK welcomes the proposal of a target but would like to see quickly become policy and that the target be a minimum area for restoration per year.

2d To what extent will the policies and proposals listed under objective **N3** provide an appropriate focus for the lifetime of the Programme in order to progress towards the long-term objective?

Fully ☐ Mostly ☐ Partially ✓ Poorly ☐   *Tick <u>one</u> box only*

Comments:

LINK welcomes the significant number of policies included in the SAP aiming to achieve the Objective. In general, the policies and proposals included under this Objective will be beneficial over the lifetime of the Programme and provide a start towards achieving the long-term aim of the SAP. However, LINK finds that too many of the policies are vague with insufficient detail or clarity as to the outcomes. For some it is unclear what action the policy will deliver and to what timescales, whilst for other policies it is unclear, beyond initial steps, what implementation may occur

In order for the objective to be met in the 5 year lifetime of the SAP and to progress towards the long-term objective LINK recommends the following changes or additions to the listed policies and proposals:

N3-1 *Implement the EU reform of the Common Agricultural Policy* *.....*
The CAP, post 2013, has climate adaptation as an objective. Therefore, the SAP must be more explicit in stating that Government will 'ensure that climate change adaptation objectives are included'.

This policy listed in the draft is particularly poorly described in terms of detailed outcomes and benefits for achieving the Objective. CAP implementation in Scotland is a large policy, brings with it millions of pounds of funding and includes many sub-policies. **We recommend that the SAP does much more to describe how individual parts of CAP policy in Scotland will aim to achieve the Objective.**

LINK believes that in order to fulfil its adaptation objective the Scottish Government must implement the CAP by including the following:
• **Support for greening of Pillar I**,
• **Ecological Focus Areas (EFAs)** supporting adaptation to the impacts of climate change. EFAs can enhance the network of green infrastructure throughout the landscape. For example, farmers could be required to maintain/create: field margins, buffer strips alongside watercourses, uncropped areas, hedgerows, trees and scrub, etc which can deliver multiple outcomes such as wildlife habitat, and reduction of flooding, pollution and soil erosion.
• **Scotland Rural Development Programme (SRDP)** 2014-2020 which incentivises land management practices that will: protect and enhance biodiversity; improve water management (including reducing diffuse pollution and flood risk); improve soil management; and mitigate and adapt to climate change. Support for practices that achieve multiple outcomes is critical given future funding constraints.
• Encouraging greater **co-operation** between land managers over contiguous properties to secure landscape-scale benefits.
• **Improved advice services** to provide information, advice and training for land managers to help them operate more sustainably and achieve multiple outcomes.

N3-5 *Implement the Scottish Windthrow Contingency Plan**....
The Interim Scottish Windblow Contingency Plan[2] ran to October 2011. There is no new activity outlined here, so this needs to be clarified.

N3-11 *Common Fisheries Policy (CFP)*
If the CFP is to ensure resilient stocks of fish in changing climate e believe strongly

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[2]http://www.forestry.gov.uk/pdf/InterimScottishWindblowContingencyPlan.pdf/$FILE/InterimScottishWindblowContingencyPlan.pdf

that the CFP must fully factor in the environmental and social costs of fishing, in addition to the climate change implications. These include:

- Legally binding objectives and long term management plans to rebuild fish stocks;
- A requirement for the CFP to support the EU's environmental policies including the Birds and Habitats Directives;
- Emphasis on Member States to reduce overcapacity of fishing fleets;
- A requirement to improve control and enforcement, and combat illegal, unreported and unregulated fishing.

N3-12 *Improve targeting of species* by using selective fishing gear and reducing discards through conservation credits and TR2 schemes.
The reformed CFP includes a legal obligation to land all fish catches (with some exemptions for species and de minimum percentages). This obligation begins on 1 Jan 2015 for some species, and by 1 Jan 2017 for all other species. Therefore the Scottish Government policy must reflect this urgency by ensuring that all fisheries use highly selective gears as appropriate and are 'Fully Documented Fisheries', i.e. using on board cameras and observers to ensure compliance with the new rules. Scottish Government must develop a strategy to ensure that fisheries do not simply swap discarding fish at sea for dumping fish on land.

N3-13 *Manage the impacts of climate change* **to help fishing and aquaculture industries achieve Maximum Sustainable Yield (MSY) by 2015,**.....
The Scottish Government should lay out its strategy to meet the new requirements of the reformed CFP, including how Scottish fish stocks will reach MSY by these deadlines. In addition, the Scottish Government must continue to support a Maritime and Fisheries Fund which prevents EU money being used for perverse subsidies promoting overfishing, and instead is redirected towards real investments in sustainability and recovery of marine ecosystems.

MSY is not suitable for aquaculture. Environmental carrying capacity should be limiting factor to aquaculture growth not MSY.

N3-14 *Introduce new Technical Standards for containment by Scottish fish farms*
LINK is supportive of this policy. Adoption and compliance with this standard will ensure that equipment can cope with higher energy environment.

N3-15 *Fishing and aquaculture industries to develop and introduce* **new technologies for environmentally sustainable commercial fishing and aquaculture.**
LINK disagrees with the rationale for this policy. The Aquaculture and Fisheries (Scotland) Bill or Technical Standard does not encourage the development of new technologies for environmental sustainable aquaculture - they regulate existing operations. New technologies need to be encouraged into commercial production by incentivisation via access to European Maritime and Fisheries Fund (EMFF) funding and Government support.

PROPOSAL
N3-16 *Greater recognition of the role of integrated land management in tackling climate change* ....
The wording of this proposal does not distinguish it from the current policy (N2-8) regarding the Land Use Strategy. More detail is needed to show the aims and expected outcomes of this proposal

ADDITIONAL POLICIES NEEDED

Increasing diversity of the farmed environment
We believe that the Scottish Government should include an action in the SAP aimed at prioritising measures that will support and enhance the diversity of the farmed environment at the field, farm and landscape scale. There is evidence that a heterogeneous farmed environment will support a greater diversity of species, habitats and ecosystems[3]. Regulations and incentives must be altered to encourage diversity.

Assessment of the environmental cost of the opportunities of climate change
We recommend an action within the SAP under Objective N3 to '**Assess the impact on the environment of potential land use and land management change as a result of climate change**'. Climate change presents potential opportunities to alter land uses or change management practices, for example to intensify agricultural production which may have a negative impact on elements of the environment. A more favourable climate for grass growth and crop production is likely to exacerbate existing negative environment trends. Marginal land, which are particularly important in terms of ecosystem services, will be potentially more productive and therefore there will be pressure to improve and intensify management of these areas. This is likely to lead to environmental consequences, such as biodiversity loss, poor water quality and increased GHG emissions.

Analysis of the benefits that trees and woods can provide in a changing climate
LINK recommends that an analysis carried out of what trees and woods can provide in a changing climate and how best they can be used to assist adaptation in all sectors. This is not evident in the Scottish Climate Change Adaptation Programme (SAP) consultation document.

CURRENT GOVERNMENT POLICIES WHICH SHOULD BE INCLUDED

Scottish Soils Framework
The Scottish Soils Framework aims to 'promote the sustainable management and protection of soils consistent with the economic, social and environmental needs of Scotland'. Healthy and sustainably managed soil will help Scotland to be resilient to climate impacts. It includes a chapter on soils in the context of climate change.
http://www.scotland.gov.uk/Publications/2009/05/20145602/0

2e Taken together, do the policies and proposals listed under objectives **N1, N2** and **N3** address the current and predicted impacts to the natural environment in Scotland identified in the UK Climate Change Risk Assessment?

Fully ☐ Mostly ☐ Partially ✓ Poorly ☐   *Tick <u>one</u> box only*

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[3] http://apostilas.cena.usp.br/Tsai/CEN-5734%20Ecologia%20Exp.%20Microorganismos/Leitura%20Complementar/artigo%207.pdf

Comments:

LINK believes that the policies and proposals in the draft SAP only partially address the CCRA risks. We have recommended a number of existing Government policies which should be included and we recommend a number of new policies to address the risks. As stated in a number of places we are also concerned with the lack of detail in the policies, plans for action and commitment to implementation. Therefore, it is not possible to be confident that the policies and proposals will address the risks.

In addition, we note, from information in the Technical Annex of the SAP a number of UKCCRA risks are not being addressed in the SAP. **LINK believes that the following risks must be addressed in the SAP and the next 5 years in some way**:
- AG30/AG57/AG58 – Breeding habitats/reproductive nature of species
- BD10 – Biodiversity risks due to warmer rivers and lakes
- BD 23 Asynchrony between species breeding cycles and food supply
- BE5 – Effectiveness of greenspace for cooling
- MA2a – Decline in marine water quality due to sewer overflows
- TRr1 – Coastal erosion

3 Views on the <u>Infrastructure and Built Environment</u> Theme

3a Do objectives **B1, B2** and **B3** collectively set an appropriate long term direction to ensure that Scotland's buildings and infrastructure networks are able to adapt to our changing climate?

Fully ☐ Mostly ☐ Partially ✓ Poorly ☐   *Tick <u>one</u> box only*

Comments:

LINK's interest in this Theme is the interaction between it and Scotland's environment, i.e. where it has an impact on the environment or where elements of the natural or historic environment or the landscape can enhance the built environment.

LINK does not hold strong views on the appropriateness of the Objectives in achieving the long-term direction, however, we refer to our answer in 1b where we state that the SAP Aim is only a small part of setting a long-term direction.

LINK is particularly concerned that the policies and proposals in this theme should be aligned to the 5th of LINK's Principles (see answer to 1a) - ***Adapt sustainably** – to avoid maladaptation and detrimental impacts on other elements of the environment.*

We believe that in implementing the SAP all stakeholders must aim to ensure that there is minimal negative impact on Scotland's environment. Rather, we want to see developers of infrastructure and the built environment in Scotland aim to 'work with nature', enhance the environment and aim to maximise ecosystem services to provide solutions to the challenges of a changing climate.

3b To what extent will the policies and proposals listed under objective **B1** provide an appropriate focus for the lifetime of the Programme in order to progress towards the long-term objective?

Fully ☐ Mostly ☐ Partially ✓ Poorly ☐   *Tick <u>one</u> box only*

Comments:

LINK's key interest in this Objective is in the area of water and flood management.

In order for the objective to be met in the 5 year lifetime of the SAP and to progress towards the long-term objective LINK recommends the following changes or additions to the listed policies and proposals:

B1-12 *FRMPs*
The SAP needs to include more detail regarding how FRMPs will address climate adaptation. SAP measures must be integrated or inform the draft FRMPs from 2015. The FRMP appraisal process will be underway in 2013-2014. It is important that climate change impacts are taken into account in this process including an assessment of how well FRM measures will be able to adapt to a changing climate and the changes it brings e.g. changes in river flows, sea level rise.

B1-13 *RBMPs*
We believe that RBMPs will ensure greater resilience in terms of water quality and quantity. However, **there is a need to understand and assess how the achievement of Good Ecological Status could be affected by climate change impacts**. The existing 'Water' Sector Action Plan[4] states that the next RBMPs will be refined to embed climate change in the RBMP programme of measures. LINK believes that the SAP should steer the development of RBMPs and that the Scottish Government must show how RBMPs are assessed for a future climate.

We note that the 2nd cycle draft RBMPs will be published in December 2014. Therefore, SEPA and its partners should be working now on how to ensure that climate change adaptation is fully embedded in these plans.

PROPOSAL
B1-18 *Surface water flooding*
The management of surface water run-off should be addressed in the FRM Planning process. Furthermore, statutory guidance on Delivering Sustainable Flood Risk Management[5] expects local authorities to lead on surface water management as part of the flood risk management planning process. Sustainable Urban Drainage Systems (SUDS) are already a requirement for new developments but Government must do more to incentivise and promote well-designed and constructed SUDs that can be positive for biodiversity, flood management and reduce the impacts of climate change.

3c To what extent will the policies and proposals listed under objective **B2** provide an appropriate focus for the lifetime of the Programme in order to progress towards the long-term objective?

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[4] http://www.scotland.gov.uk/Resource/0039/00396111.pdf
[5] http://www.scotland.gov.uk/Resource/Doc/351427/0117868.pdf

Fully ☐ Mostly ☐ Partially ✓ Poorly ☐   *Tick <u>one</u> box only*

Comments:

In order for the objective to be met in the 5 year lifetime of the SAP and to progress towards the long-term objective LINK recommends the following changes or additions to the listed policies and proposals:

B2-2 *Sustainable Urban Drainage Systems Working Party*
Sustainable Urban Drainage Systems (SUDS) are already a requirement for new developments but Government must do more to incentivise and promote well-designed and constructed SUDs that can be positive for biodiversity, flood management and adaptation to climate change.

There is a need to provide guidance to local authorities and developers on how to design and manage SUDS not only for flood risk management but also for reducing the risk of future climate impacts and for biodiversity. Guidance already exists, for example, http://www.rspb.org.uk/Images/SuDS_report_final_tcm9-338064.pdf

B2-3 Water Use Efficiency
LINK welcomes the introduction of a mandatory standard for water efficiency.
In 2012, Scottish Water published its Water Efficiency Plan[6] which runs until 2015. Many of the actions involve communications, establishing partnerships and working to influence developers. The efficacy of this plan must be closely followed and reviewed.

This year, Scottish Water met its **Economic Level of Leakage** (ELL) target ahead of schedule. However, this means that 548 Mega litres of water are still leaked each day in Scotland. LINK does not believe that this is acceptable. More ambitious leakage targets must be developed to reflect the true costs of leakage on the environment and society (e.g. biodiversity and habitat loss through abstraction, climate change impacts from the energy used to abstract, treat and pump water and so on). We recommend that Scottish Water and its regulators must explore sustainable leakage models.

B2-4 *Implement Historic Scotland's Climate Change Action Plan.....*
LINK is concerned that Historic Scotland's Climate Change Action Plan is focused on the properties being managed under their jurisdiction and the actions deriving from their research should be disseminated beyond these monuments and buildings.

B2-5 *Joint agency climate action programme*
We welcome the inter-agency policy but we recommend including local authorities, where appropriate, as one of the crucial agencies in implementing this programme activity

B2-8 *Marine Research Strategies and Monitoring Programmes.*
Coastal buildings and infrastructure are at risk from increased storm frequency and intensity arising from a changing climate. Therefore, LINK research believe it is right to carry out further research into the capabilities, capacity and potential of coastal habitats to protect coastal infrastructure. Habitats with this potential include seagrass beds, kelp forests, saltmarsh and biogenic reefs.

B2-9 *National Marine Plan (NMP)*....

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[6]http://www.scottishwater.co.uk/assets/domestic/files/you%20and%20your%20home/water%20efficiency/swwaterefficiencyplan.pdf

And
B2-10 *Regional Marine Plans.......*
Please refer to comments on N2-13 and N2-14

CURRENT GOVERNMENT POLICIES WHICH SHOULD BE INCLUDED

Sustainable Land Management Approach by Scottish Water
The Water Resources (Scotland) Act 2013 allows Scottish Water to enter into agreements with land managers and local authorities to protect and improve raw water quality. This provides an opportunity for Scottish Water to take an active role in sustainable land management in drinking water catchments.

LINK recognises that Scottish Water has piloted sustainable land management approaches but we would like to see this commitment deepened and supported by Government and all SW's regulators. Sustainable land management approaches should be integrated into Scottish Water's core business. Land management measures that store carbon and reduce pollutants entering water have clear economic benefits for Scottish Water in terms of reducing treatment costs but also helps them meet various statutory duties. Crucially, sustainable land management will help the water industry adapt to climate change, e.g. in a scenario where low flows will reduce the dilution effect of pollutants, it will be advantageous to minimise the extent of pollutants reaching watercourses.

Hydro Nation
The Government's Hydro Nation policy agenda should be included in the SAP. This policy has various strands but the essence is development of Scotland's water resources, technological advances and sharing Scotland's water management expertise internationally. Government has set up a programme of Hydro Nation scholarships with CREW to fund postgradute research - some of this research should inform Objectives B1 and B2.

Flood Risk Management Plans
LINK recommends that Flood Risk Management Plans (FRMPs) are included under objective B2 as a 'tool' in helping to manage climate impacts on buildings and infrastructure.

3d To what extent will the policies and proposals listed under objective **B3** provide an appropriate focus for the lifetime of the Programme in order to progress towards the long-term objective?

Fully ☐ Mostly ☐ Partially ✓ Poorly ☐   *Tick <u>one</u> box only*

Comments:

B3-10 *RBMPs*
LINK cautions that RBMPs should help to achieve the objective but only if fully

implemented. We recommend that the policy wording is changed to reflect the need for implementation.

3e Taken together, do the policies and proposals listed under objectives **B1, B2** and **B3** address the current and predicted impacts to Scotland's buildings and infrastructure networks identified in the UK Climate Change Risk Assessment?

Fully ☐ Mostly ☐ Partially ✓ Poorly ☐ *Tick <u>one</u> box only*

Comments:

LINK believes that the policies and proposals in the draft SAP only partially address the CCRA risks. We have recommended a number of existing Government policies which should be included and we recommend a number of new policies to address the risks. As stated in a number of places we are also concerned with the lack of detail in the policies, plans for action and commitment to implementation.

We particularly concerned that the policies and proposals under this objective are not inclusive of Scotland's historic environment interests and concerns – especially outwith sites designated by Historic Scotland. In particular we would
Like to see UKCCRA BE4/FL 15 '*Cultural heritage at risk of erosion'* fully addressed.

4 Views on the <u>Society</u> Theme

4a Do objectives **S1, S2** and **S3** collectively set an appropriate long term direction to ensure that our communities are able to adapt to our changing climate?

Fully ☐ Mostly ☐ Partially ☐ Poorly ☐ *Tick <u>one</u> box only*

Comments:

LINK is not able to not able to provide comment on the Society Theme.

4b To what extent will the policies and proposals listed under objective **S1** provide an appropriate focus for the lifetime of the Programme in order to progress towards the long-term objective?

Fully ☐ Mostly ☐ Partially ☐ Poorly ☐ *Tick <u>one</u> box only*

Comments:

4c To what extent will the policies and proposals listed under objective **S2** provide an appropriate focus for the lifetime of the Programme in order to progress towards the long-term objective?

Fully ☐ Mostly ☐ Partially ☐ Poorly ☐   *Tick <u>one</u> box only*

Comments:

4d To what extent will the policies and proposals listed under objective **S3** provide an appropriate focus for the lifetime of the Programme in order to progress towards the long-term objective?

Fully ☐ Mostly ☐ Partially ☐ Poorly ☐   *Tick <u>one</u> box only*

Comments:

4e Taken together, do the policies and proposals listed under objectives **S1, S2** and **S3** address the current and predicted impacts to Scottish society identified in the UK Climate Change Risk Assessment?

Fully ☐ Mostly ☐ Partially ☐ Poorly ☐   *Tick <u>one</u> box only*

Comments:

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5 Views on the <u>Role of Others</u> in Delivering the Programme

5a What support will public bodies require in meeting their duties to help deliver the programme?

Comments:

Public bodies need support through quality tools and guidance to help deliver the programme. **LINK is specifically concerned that there needs to be development of tools which help decision-makers analyse multiple environmental factors and consequences of decisions prior to implementation.** These tools should aim to recognise and understand trade-offs and the negative environmental consequences of planned actions.

We would also like to see greater effort to develop partnerships and resources to test and roll out solutions more widely. We want to see support for public bodies 'learning by doing'.

5b Are the arrangements for ensuring public engagement and for involving employers, trade unions and other stakeholders in meeting the programme objectives sufficient?

Yes ☐ No ✓

Comments:

The Act requires that the SAP includes '*the mechanisms for ensuring public*

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engagement in meeting those objectives'. The draft SAP sets out a list of those Agencies and Public Bodies involved in public engagement as the mechanism. We welcome that Government is working with these organisations to spread messages, advice and guidance. However, the majority of these organisations listed work with other organisations and not directly with the public. We recommend a more direct provision of information between Government and it's information providers and the public.

Furthermore, LINK believes that SAP should set out it's objectives, policies and actions for public engagement on climate adaptation. We would like to see Government using the adaptation action, such as adaptation projects, to demonstrate to people how Scotland is preparing for a changing climate and the need for mainstreaming these actions. **LINK recommends that the SAP includes early and real adaptation action on the ground and a plan to demonstrate it to the public** so that they can see what adaptation and resilience to climate change involves.

6 Views on the <u>Environmental Report</u>

6a To what extent does the environmental report set out an accurate description of the current environmental baseline?

Fully ☐ Mostly ☐ Partially ☐ Poorly ✓   *Tick <u>one</u> box only*

Please give details of <u>relevant</u> sources:

The environmental report has been conducted at a high level of assessment, and as a result much detail and many environmental impacts are likely to have been missed or poorly described. This makes the environmental report of low value in decision-making.

6b Do you agree with the predicted environmental effects of the draft adaptation programme, set out in the Environmental Report?

Yes ☐ No ✓

Comments:

LINK does not agree with the predicted environmental effects of the draft SAP as set out in the report, although we do agree that the majority of policies in the Natural Environmental theme will have a benefit on the environment and help Scotland's environment to adapt.

We believe that the report overstates the role and benefit of the SAP in solving environmental problems. We believe that the additional benefits of the SAP in its current draft will not be great, compared to there being no SAP. Many of the policies are already in existence and being implemented – the draft SAP only often only describes how policies will be altered or benefit adaptation objectives.

6c Do you agree with the recommendations set out in the
Environmental Report?

Yes ✓ No ☐

Comments:
LINK agrees with the recommendations which address LINK concerns, namely:

- LINK agrees that the SAP must do more to address the impacts on soil more directly.
- We also agree that more work is needed to address nutrient enrichment of water and water availability issues.
- Impacts on landscapes are also an important issue for LINK and we welcome more work in this are in the long-term.
- We welcome the recommendation to review impacts on food supply in Scotland.

However, we note that because the environmental report has been conducted at a high level, much detail and many environmental impacts are likely to have been missed or poorly described. This makes the environmental report of low value.

6d Do you agree with the proposals for monitoring of the environmental effects of the draft programme set out in the Environmental Report?

Yes ☐ No ✓

Comments:
LINK welcomes the recognition that the SAP may result in negative impacts on the landscape, biodiversity and cultural heritage. However, we believe that because the SAP fails to set Principles for adaptation or environmental safeguards, the negative impacts could come from implementation of many of the policies – for example, not just the measures focussing on flood risk in the Natural Environment theme.

We agree that the monitoring for the SEA should be an integral part of the monitoring for the SAP. However, **we believe that the policies for monitoring in the draft SAP and the information in the Environmental Report are insufficient for monitoring the impacts of climate change on the environment of Scotland, the impacts of SAP policies or indirect impacts**. Monitoring is number 1 in LINK's 5 principles (see answer to question 1a). We have highlighted the need for a new policy of environmental monitoring (**Review of current ecological data collection)** in answer to Question 2b. This must be followed up with a comprehensive plan to monitor environmental change and must be integral to the SAP.

6e Are you aware of any further environmental information that will help
to inform the environmental assessment findings?

Yes ✓ No ☐

Please give details of relevant sources:

We recommend a review of the newly published report cards from Living with Environmental Change (LWEC) – both the terrestrial and water report cards. http://www.lwec.org.uk/resources/report-cards

6f Are you aware of other 'reasonable' alternatives to adaptation programme   and its content that should be considered as part of the SEA process?

Yes ☐ No ✔

Please give details of relevant sources:

7 Additional Comments

7a Please provide any additional comments you would like to make on the   draft Scottish Climate Change Adaptation Programme.

Comments: