

Scotland's Biodiversity – It's In Your Hands Implementation Plans 2005-2008

Scottish Environment LINK consultation response

This response has been developed and led by the Biodiversity Task Force of Scottish Environment LINK. Contributions have also been made by the Marine, Agriculture, Woodland and Climate Change Task Forces. This response is supported by the following LINK member bodies:

Badenoch and Strathspey Conservation Group
Biological Recording in Scotland
Butterfly Conservation Scotland
Cairngorms Campaign
Hebridean Whale and Dolphin Trust
Marine Conservation Society
The National Trust for Scotland
North East Mountain Trust
Plantlife Scotland
RSPB Scotland
Royal Zoological Society of Scotland
Scottish Countryside Rangers Association
Scottish Native Woods
Scottish Wildlife Trust
Sustrans Scotland
Woodland Trust Scotland
WWF Scotland

Introduction

The LINK Biodiversity Taskforce welcomed the launch of the Scottish Biodiversity Strategy 'It's In Your Hands' (SBS) and supports the concept of its focused delivery through detailed Implementation Plans. LINK members have been heavily involved in developing the Implementation Plans through the various working groups. While we believe the groups have succeeded in identifying what needs to be done, the plans still require a significant amount of further work to determine exactly how each issue is to be addressed.

While it is frustrating that further refinement is necessary, it is vital if the Implementation Plans are to promote genuine actions that will actually convert the high level objectives of Scottish Biodiversity Strategy into reality. In their current form, the plans are not sufficiently clear in expressing and defining the nature of the actual tasks to be undertaken. This ambiguity creates considerable room for confusion and uncertainty

among Lead Partners and Stakeholders. Whilst the majority of the actions should be retained and implemented, LINK fears that recurring flaws in the language and structure must be addressed to prevent a pivotal document of great promise being seriously undermined.

Whilst we regret making criticism at this stage, we believe that as coalition of key stakeholders, it is important to have a document that we can collectively sign up to and be confident in its content and intent. Therefore, this response firstly sets out key concerns and highlights the major themes that we believe need to be addressed during the next stage of redrafting and how this will lead to a much stronger finalised document. This overview is then supplemented by more specific comments on the individual plans based on more detailed suggestions from the specialist interests represented via the Scottish Environment LINK Task Forces.

General Comments

- **Language of the document**

Many of the actions need to be centred on what exactly needs to be done. For example, the action should make it clear if it is describing research needs, new guidance, new legislation, or additional spending etc. Unfortunately several of the actions describe vague aspirations that fail to define a specific task. This undermines the effectiveness of the plans, and in turn the Scottish Biodiversity Strategy. Clearly, the implementation plans should set out the specific steps that must be undertaken to meet the aspirations and overall goals set out in the SBS. In summary, the actions must all be assessed to ensure they are Specific, Measurable, Achievable, Realistic, and Timed (SMART).

Without well-defined and specific actions, it is difficult to develop meaningful milestones and this is evident in many sections of the plan, most notably the cross cutting and local delivery sections. Several of the milestones relate to vague aspirations rather than meaningful quantifiable outputs. All milestones must be reviewed to determine if they relate to a specific event e.g. a policy is finalised, a report published, a certain number of grants are distributed, no. of ha restored or BAP actions implemented for example.

Recommendation 1

Amend each implementation plan to ensure that all actions are task specific and relate to measurable outputs and milestones

There are too many acronyms in the plans and not all are listed in the glossary. This could pose a considerable barrier to the wider promotion of the plans, especially for those partners outside the established biodiversity community. Concepts such as the ecosystem approach and soft engineering are used throughout the plan without being adequately defined.

The terminology within the Implementation Plans is at times confusing and inconsistent. For example, the term Lead Partner could be confused with the same term used in the context of delivering HAPs & SAPs in the UK BAP process. Similarly, the Lead Partner

and Stakeholder columns within the Implementation Plans must describe actual organisations or working groups. For example, actions should not refer to 'LBAPs' as stakeholders but should specify the partnership, a named partner organisation, or the LBAP officer, as appropriate.

Recommendation 2

Amend, reduce and clarify the use of acronyms and conceptual terminology so that the plans are understandable to a non-specialist audience

Furthermore, Scottish Environment LINK is a representative coalition that delivers action via its individual members and should not be listed as a stakeholder. Where possible, individual environmental organisations should be listed as stakeholders against specific actions. However, in some cases, it is not clear which eNGO should be identified as a stakeholder and in these cases, the term eNGO should be used to allow for future sign up. Once the plans have been published and actions suitably clarified, the Biodiversity Task Force of LINK undertakes to consult with and identify the relevant LINK members who need to be involved and listed as stakeholders for specific actions. This is not yet possible because the role of lead partners and stakeholders remains unclear. It will be particularly important to clarify the role for smaller LINK member bodies with limited capacity, who have reservations about taking on new commitments, without a clear indication that the necessary resourcing will be available.

Recommendation 3

Set out in the implementation plans the role, responsibility and duties associated with signing up as a stakeholders or lead partner; ensure that lead partners and stakeholders are specific, responsible organisations and not partnerships with no corporate identity

- **Structure of the Document**

In their current form, the Implementation Plans fail to indicate which actions are immediate priorities or which actions have already commenced. While the Biodiversity Task Force wishes to see the majority of actions progressed as a matter of urgency, we accept that some actions will have to precede others. The fact that the sequence of timing is not addressed in the implementation plan is a major weakness. In particular, the baseline and institutional issues that underpin the delivery of the strategy must be identified and highlighted for early delivery.

As capacity is limited, the strategy should steer partners to sign up for actions in a strategic way. Currently the plans resemble wish lists rather than structured programmes for carrying out actions. This will make monitoring problematic especially in the initial years of the plans. In this respect there is an obvious distinction to be made between actions that are resourced and those where funds are still to be secured.

Recommendation 4

The finalised plans should be structured and presented in such a way that they give some indication of priority for implementation, so they become a more coherent programme of action.

Each plan should clearly be seen in context and set out how it relates to and supports the objectives of the SBS. In this respect some plans are much more effectively presented. For example, the detailed introductory text within the Marine Implementation Plan offers an excellent insight into the rationale behind the proceeding actions. Other Implementation plans fail to do this, most notably the rural plan. It would be helpful if all the plans provided the reader with a clear understanding of the rational underpinning the proceeding actions. Each action in the implementation plan tables can then focus solely on the specifics of the task to be completed, with less explanation and description (See recommendation 1).

Recommendation 5

This introductory section preceding the tables in each plan should be more than a brief summary and focus on clearly explaining the rationale for the proposed actions within each implementation plan.

It is important to address the fact that the plans mark the beginning of an ongoing and long-term process. In this respect, the detailed description offered in Appendix 3 that summarises existing actions within the Marine Implementation Plan is very useful as it offers a baseline and starting point for future actions. There is no reason why each of the other implementation plans should not be supported by similar tables reviewing and summarising current activities. This baseline summary helps distinguish between new areas of work that have yet to be commenced and existing ongoing actions. This is clearly necessary if the effectiveness and the added value of the SBS is to be judged.

The marine plan also sets out longer term actions that are still in development through the “future actions column” contained in its tables. This is valuable as it acknowledges that the plans form part of a 25 year strategy. Such a column will also assist in revising and updating the plan and moving forward incrementally and consistently. The brief paragraphs, contained in the other plans, on this topic are much less effective.

Recommendation 6

Each plan needs to be supported with a baseline summary of current actions, equivalent in detail to the tables in appendix 3 for the marine plan.

Recommendation 7

The “future action” column in the table of the marine plan should be replicated in all the other plans.

There are some inconsistencies in the way implementation plan tables are presented, particularly the additional monitoring column in the urban plan. This is unnecessary and

simply causes confusion with the milestones column (ie. what progress is being monitored against).

Recommendation 8

Remove the monitoring column in the urban plan and include details alongside milestones to achieve consistency alongside across the suite of plans.

Many communication items are scattered throughout the various individual implementation plans with insufficient reference to the ICE plan. A similar situation occurs with regard to cross-cutting actions such as funding and policy co-ordination. In addition, issues such as transport also occur throughout different Implementation Plans. In many cases actions appear to be duplicated between different plans, with essentially the same action expressed using different terminology. This risks actions either being duplicated or overlooked because they fall between plans. The examples of the potentially serious problem are too numerous to list in this response, the following are therefore just examples;

- ICE 6.1, 6.2 = Urban 7.6, 7.7, 7.11 (All cover entitlements to access biodiversity)
- ICE Action 6.3 = Urban 2.3, Urban 4.8, Urban 7.4 (All cover awards)
- Cross-cutting 2.2 = Urban 2.1 – 2.4, ICE 9.1 & 9.2 (All covering business involvement)
- Local Deliver 6.3 = Urban 4.1 - 4.3 (habitat assessment, classification & designation)
- Rural 2.9 = Urban 5.3 (Management Plans for NNRs)

Recommendation 9

A) Provide much clearer referencing between plans to highlight recurring communications and cross cutting issues.

B) Where individual plans have similar or related actions to other plans use consistent language

C) Utilise the cross-cutting plan to identify, highlight and co-ordinate actions that span more than one plan.

Some of the plans lack coherence and are not user friendly, simply because they are poorly structured. This means that similar and related actions do not sit next to each other under the same themed heading. The rural plan in particular suffers badly from this approach due to its length and the use of broad headings rather than a more sectoral approach. A similar situation arises in the cross-cutting plan where actions seem to be loosely grouped together, which does not aid the user. The ICE, Urban & Marine plans take a much more structured approach using several specific headings focused around sector issues (e.g. actions relating to the business community) or themes (e.g. national policy). Whereas the rural plan suffers from using broad sweeping headings such as “Integration & co-ordination” the urban plan benefits from using specific sections such as “Integrating biodiversity into urban regeneration, development and all planning systems”.

Recommendation 10

Restructure the rural and cross-cutting plans so that actions are grouped under specific headings reflecting sectors and themes.

- **Content Issues**

In their current form the Implementation Plans do not sufficiently identify biological ends as milestones for actions. It is important that whenever appropriate the action should be measured against a biological target. If the Implementation Plans are to offer a means of delivering the SBS and fulfilling Scotland's commitment to the Convention on Biological Diversity, they must be assessed against predetermined biological ends.

Recommendation 11

More of the actions and milestones should focus on delivering measurable biological and habitat related outputs.

- **Implementation Issues**

The public sector in Scotland now has a duty to further the conservation of biodiversity as well as contribute to the realisation of the UK's international obligations. It is therefore essential that the Scottish Executive develops leadership taking overall responsibility for delivery of each Implementation Plan. Recognition of this role is largely absent from the current draft plans and needs to be much more evident in the final plans. Whilst the voluntary and NGO environment sector is in a strong position to support and assist delivery; a lack resources and statutory powers mean that success is heavily reliant on the commitment offered by the public sector and most importantly national government.

Recommendation 12

Introductory sections preceding each plan should set out the commitment delivery of the plans provided by the Scottish Executive and statutory agencies.

The overall scope of the Implementation Plans is ambitious; both in terms of the number of actions and the level of resources required to facilitate delivery. It is noticeable that in their current form the Implementation Plans do not provide any significant consideration of how new and future actions will be supported. Until this is addressed the plans will constitute a series of wish lists rather than a programme for action. It is vital that before stakeholders sign up actions they are given some indication of the overall level of resources available for deliver new or enhanced actions. In this respect the biodiversity action grants scheme (BAGS) is a welcome first step but wholly inadequate in relation the multitude of new and competing demands reflected in the implementation plans. The implications for staff in the biodiversity public and voluntary sector should also not be under estimated. Furthermore, support and resources for LBAPs must be continued on a long term basis and strengthened.

Recommendation 13

The Scottish Executive must assess;

- **the cost of the actions programmed for the first 3-years of the plan, assess the level of funding currently available, and provide reassurance that any gap will be bridged;**
- **the number of core-staff both nationally and locally that need to be on secure long-term contracts to deliver the plans.**

1. ICE Implementation Plan

Introduction

The Interpretation, Communication and Education of Implementation Plan was developed late, and despite the complexity and importance of the topic is acknowledged in the draft document that

“aspects of this plan have been developed with a lesser degree of involvement from key stakeholders than was achieved for the sectoral plans. As a result, further refinement of the plan will be required post May 2004, including more extensive consultation with a wider range of stakeholders and potential lead partners.”

It remains the case that detailed actions, milestones and lead bodies have still, in most cases, to be addressed.

In this consultation response, LINK makes recommendations on the structure and delivery of the process, rather than detailed comments on the actions listed in the draft plan.

Issues

The delivery of the Interpretation, Communication and Education (ICE) sector of the SBS is threatened by two major issues

- The need for a comprehensive communications framework
- The need of greater capacity and commitment to ICE.

- **A communication framework**

A communications framework will establish the biodiversity messages associated with the main audiences, give guidance on how these messages are to be communicated and on how biodiversity as a whole, rather than as a series of unconnected parts, is to be established with the public. This is a process similar to those undertaken by organisations in establishing their image and brand. Careful control over messages is essential in establishing a coherent image for a complex issues like biodiversity. It is especially critical in this case since parts of the image, including some species and habitats, are very familiar to general audiences. As part of this development, it will be essential to look to

other parts of the world for research and exemplar material that can be translated to a Scottish context. This will build on the work carried out in the development of the Biodiversity Interpretation Strategy.

The production of this framework should be an early action for the implementation of the strategy. It will lead to the prioritising and rationalisation of the existing draft targets in the sector.

This framework should also be the basis for guidance to other participants on best practice in carrying out communications work. In the first instance, a major target for guidance will be those organisations carrying out the communications sections of other implementation plans.

• **Increased capacity**

While the Scottish Biodiversity Strategy recognises communication as central to success, there has been an overall failure to provide staff or funding to support this work. If the aims of the SBS are to be met in this sector, there must be a considerable increase in capacity. This must be additional, it must not be at the expense of commitment and funding of other parts of the Strategy.

A specialist core group, with the mix of skills necessary to develop a communication framework and establish the basic principles should be established. It is likely that this group will need specialist outside assistance in this task. There is considerable experience in communications to be found within SBF bodies, and the experience of other biodiversity communications in the UK, Europe and wider should be brought into play.

• **A Revised Implementation Plan**

In view of these constraints, a major revision of the published draft ICE Implementation Plan is necessary. A revised table has been produced which shows new actions or comments or changes in bold type. In addition, the draft plan has been grouped into a revised framework, which increases its clarity. All the statements from the draft plan have been included.

I.D	Suggested changes to action Actions	Suggested changes to Milestones	Suggested Lead	Suggested Stakeholders
1. To produce a sound framework and principles for action.				
New Action	Develop a framework for biodiversity communication	Research and publish a rationale and guidance for communicating biodiversity, including audience, message and media analysis	2005 Specially created core group SNH/SEPA lead?	All SBF organisations

New Action	Develop guidance on communication for specific biodiversity sectors	Provide groups working on species, habitats and cross-cutting issues with help and written guidance	2005	Specially created core group SNH/SEPA lead?	All SBF organisations
New Action	Integrate biodiversity awareness campaigns at national level	Ensure integration of interpretation and awareness campaigns across stakeholders and lead organisations	2005	Specially created core group/ICE SNH/SEPA lead?	All SBF organisations
New Action	Establish and maintain links with relevant organisations	Ensure that biodiversity communication are integrated with other communication and education programmes	2005	ICE/core group	All SBF organisation Identified relevant bodies

2 Working with general audiences					
2a. To increase understanding & appreciation of biodiversity among a general audience					
New Action	Establish a large scale biodiversity awareness project based on community and school involvement	Introduce the integrated awareness programme and develop the BIG project	2006-7	SNH/LTS? See 3a.4	SBF, SNH, NGOs
Act 1.3 p15	Roll out nationally the existing pilot programme which uses digital and video media to engage and involve people in biodiversity	Production of DVD films, and subsequent action built on inspiration	2007	BTCV	Mainly young people in urban environments????????
Act 1.4 p15	Consumer guidance on biodiversity issues	Disseminate information and improve marketing support	2007	SE, Scottish Consumer Council	Soil Association Scottish Retail Association

2b To promote understanding of the issues affecting biodiversity in a local context					
Act. 8.1 p19	Raise biodiversity awareness by continuing or establishing partnerships and sharing best practice: Establish biodiversity "partnerships" in each urban area to promote biodiversity action / awareness / participation. More consistency and better delivery.	Biodiversity "partnership" established in each urban area	2007	COSLA/ SNH	SE , CBI , LAs , LBAPs, Community Planning Partners, LECs, LINK, FC(S)
Act 8.2 p19	To seek opportunities to increase the number and extent of opportunities for raising publicity of local biodiversity, through events, exhibitions, other media, etc.	Events in all local council areas	2006	SBC/ LBAPs/LINK	SNH, Scottish Arts Council, Community groups, Voluntary sector, FC(S)
Also relevant: Marine 6.1; Rural 2.1, 2.2, 2.3, 2.7; Urban 7.10					
2c. To promote first hand experience of biodiversity for general audiences					
Act 6.1 p18	Outdoor education — first hand experience of the natural world as an entitlement for all citizens	Capacity building within the professions involved. Funding	2007	SEED; CoSLA	SNH, SEPA, Local communities, LBAP Partnerships , LAs
Act 6.2 p18	Raise awareness amongst local communities of biodiversity and	Identification of further record centres	2006	LAs, CoSLA, SNH	Biological Recording in Scotland (BRISC)

	opportunities for involvement: Initiatives to link communities and local biodiversity in recording activities.	Combine with 8.2?			
Act 6.3 p18	Provide guidance on biodiversity input, co-ordinate and publicise existing award schemes	Evidence of biodiversity criteria in award schemes	2007	Scotland in Bloom, Keep Scotland Beautiful, LAs	Local communities, LAs, LBAP, SNH

Also relevant: Rural 2.5, 2.9; Urban 7.8

2d. To promote local greenspace as a setting for working with communities

Act. 7.1 P18	"Garden for Life" Integrate this work into wider programmes	Develop the community learning and development role in the conservation and appreciation of the local natural environment and open space	2005	SNH, LAs, Agencies, RBGE	Community Learning and Development Plans BTCV CoSLA Communities Scotland Youthlink Young Scot
Act 7.2 p18	Carry out a national survey of attitudes to open space	National survey completed.	2006	SE	SNH , LAs , Agencies, GS, NGOs
Act 7.3 p18	Guidance on gardening practice to encourage native plants and wildlife	Review local needs, and work in partnership with media (Beechgrove Garden etc) Combine with 7.1?	2007	SE, SNH, LAs	Scottish Allotments and Gardens Society

Also relevant: Urban 5.3, 7.3

3. Working with schools and with young people

3a. To promote first hand experience of biodiversity in schools					
3a.1	Audit current status and practice of biodiversity teaching and learning in schools	Establish current status and identify best practice	2005	SDELG LTS	
Act 2.1 p15	Develop Biodiversity module for Eco-Schools	Practical experience of biodiversity in schools	2005	EcoSchools Scotland	SNH, RSBP , SEED, Grounds for Learning
Act 2.2 p15	Work experience of the natural world through volunteering and other experience including tourism related activities. Raise understanding of the local environment	Include biodiversity within the employability and social inclusion measures in education	2007	Careers Scotland	SE (departments dealing with education, lifelong learning, environment & sustainable development), CoSLA
Act 2.3 p15	Develop the "BIG National Project" See first New Action under 2a	Initially develop the national and local groups to plan the project and develop resources	2007	SNH LTS partnership; Remove NGOs Scottish Executive	National Biodiversity resources, Local authorities, Communities
3a.4	Develop school grounds and Greenspace: Establish a National School Grounds Development Grant Fund. (this could be a match funding	Target % of schools are accessing funds Quantitative targets to be agreed with lead partner	2007	SE (Ed and ERAD)	Grounds for Learning (GfL), LAs, Individual schools

	scheme).				
Act 2.4 p15	Ensure support for teachers taking pupils out of school: Identify support needs required (including H&S), publish and distribute guidance note to include assessment of risks and training.	Provide user friendly materials to ensure the administration and management of the out of classroom experience facilitates the learning	2006	SNH; SEED; LAs	LBAP Partnerships , Schools, Local Authority Education Departments and Advisors, Greenspace Trusts, Paths for All Partnership, BTCV, Eco Schools, City farms movement , Gardens for life, Scotland in Bloom, Allotments, Cultural coordinators, FC(S)
Act 2.6 p16	Improve opportunities for 5-14 access to sites: Compile a list of special sites suitable for school visits.	Pilot programme within 3 LA within 1 year.	2006	SNH	Countryside Rangers, LBAP Partnerships , SNH, NGOs, Planners, FC(S)
Act 2.7 p16	Link first-hand experience opportunities to curricula: Offer in-service training to teachers to promote better use of materials especially those relating to learning from first hand experience.	Take up rates for training offered to schools in local authorities		LAs	Environmental education practitioners

Also relevant: Rural 2.4; Urban 7.7, 7.9

3b. To ensure that students in teacher education learn how to teach about biodiversity

Act 3.1	Promote biodiversity in policy and	Establish and maintain dialogue with those	A/A	Education faculties and LTS	Appropriate departments of Scottish Executive
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p16	practice as appropriate in ug/pg Education programmes for the teaching profession	responsible for implementation of revised guidelines on Initial Teacher Education			
Act. 3.2 p16	Teacher training faculties work with SEED to develop a pilot training programme for primary and secondary to promote the benefits of first hand experience.	Academic representatives meet to agree targets	2005	Faculties of Education	Colleges, SNH, SEED, LTS,FC(S)
3c. To provide biodiversity materials for schools					
Act. 4.1 p17	Produce high quality educational resources for use by schools as part of the 5-14 curriculum, and helping to deliver the proposed SBS interpretation strategy.	High quality educational resources produced for use by schools as part of the 5-14 curriculum, helping to deliver the proposed SBS interpretation strategy	2006	Learning and Teaching Scotland	SE Education Department, Careers Scotland, FCS, SNH, Woodland NGOs, Forest Education Initiative
Act 4.2 p17	List of relevant existing learning opportunities to be collated for each LA and communicated to schools.	Updating and developing environmental education directories as part of the BIG project	2007	LA education advisors or countryside rangers.	LBAP Partnerships, Schools, Local Authority Education Departments and Advisors, Greenspace Trusts, Paths for All Partnership, BTCV, Eco Schools, City farms movement, Gardens for life, Scotland in Bloom, Allotments, Cultural coordinators, FC(S)

4. To ensure that business and land management decisions take account of biodiversity					
Act 9.1 p19	Biodiversity awareness campaigns for targeted audiences (e.g. tourism, land managers, aquaculture, planners, architects — professional institutions) "In your hands"	Integrate the professional input to the BIG project and development appropriate elements of the awareness campaign for targeted audiences (journals, newsletters etc.)	2005 onwards	??????	Professional bodies and organisations at national and local level
Act 9.2 p19	Increase awareness of the relevance of biodiversity to business and promoted through inter alia conferences or workshops, or corporate "champions"	If appropriate hold national conference within 1 year followed by area workshops	2006	SB Co-ordinator	LBAP partnerships, LAs, SBC, CBI, Enterprise Network
Act 9.3 p19	Increase and geographically spread biodiversity related training.	Develop national and local links for awareness campaigns and BIG project	2007	SNH/BTCV	Scottish Wildlife Trust, Countryside Trainers' Network, Volunteers, Professionals, Trainees, Community members, Students
Also relevant: Marine 6.3; Rural 2.6, 2.8; Urban 2.1, 2.2, 3.3,					

2. Urban Plan

Table 1.2. This table shows the suggested changes to the Urban Plan actions.

Item & Page	Changes to Action	Changes to Milestones	Changes to Stakeholders & lead agencies or monitoring	Rationale for proposed changes
P30 1.1.	Produce and promote guidance and best practice on protecting and enhancing biodiversity through open space planning for use in the public and private sectors	All public sector estate management strategies/plans and planning document incorporate policies for the protection and	SWT is a stakeholder through work promoting urban wildlife sites and work on local planning issues	Simplify wording for clarity

		enhancement of biodiversity		
P30. 1.2	<p>Reform economic development programmes budgets for property & regeneration to provide additional funds for biodiversity improvement</p> <p>Check for duplication and overlap with p.31 actions 2.1 - 2.4 & other sections of the plan. Cross reference and harmonise wording across the plans.</p>	All appropriate programmes incorporate biodiversity promotion elements		Simplify wording for clarity to clarify desired outcome
P30 1.3	Promote model <u>planning</u> conditions and scope for <u>local</u> biodiversity funds	<p>Set of model conditions and guidance produced</p> <p>First biodiversity fund established by a local authority</p>		<p>Clarify whether action relates to 'planning gain'</p> <p>Clarify whether this operates at a local authority level</p>
P30 1.4	Undertake research into the incorporation of biodiversity protection and enhancement into planning consents	<p>Research commissioned and completed</p> <p>All new plans feature policies for the protection and enhancement of biodiversity</p>		<p>Clearer and more action centred wording needed</p> <p>This action needs to happen prior to action 1.4</p>
P30 1.5	Issue revised guidance to community planning partnerships on the incorporation of biodiversity consideration into community plans	100% coverage of biodiversity in community plans by 2007		Clearer and more action centred wording needed
P 31 1.6	Promote and increase the use of SUDS through raising professional awareness and better regulations governing Scottish Water			Clearer and more action centred wording needed
P 31 2.1, 2.2, 2.3, 2.4,	<p>Check these actions for duplication in other sections of the plans such as ICE and Cross Cutting</p> <p>Cross reference and harmonise wording across plans</p>		SWT is a stakeholder through its work at its Jupiter Wildlife garden which has been developed in partnership with a number of corporate sponsors	Duplication and overlap with other sections of the plan

P.32 3.1	Review all planning & building advice to ensure coverage of biodiversity protection, retention and enhancement issues Check for duplication	Review completed <u>and published</u>		Clearer and more action centred wording needed
P.32 3.2	Improve the information and training available to key professions on the role of site, planning building and construction in protecting and enhancing biodiversity			Clearer and more action centred wording needed
P.32 3.3			SWT is a stakeholder through the provision urban area workshops at the annual Scottish Greenspace Forum Seminar	
P.33 4.1	Complete a comprehensive survey of biodiversity in and around towns and cities and publicly available through local record centres Cross-reference with other related habitat survey actions	All areas surveyed by 2007 A programme is in place for monitoring and updating data	SWT is a key stakeholder through the work of our member centres in undertaking wildlife surveys	Clearer and more action centred wording needed
P32. 4.2	Cross reference and harmonise wording with local sites action in the cross cutting section See p109, 4.5		SWT is a stakeholder through membership of the current SNH/COSLA working group	Avoid duplication and promote an integrated approach to local site designation Local site is the established term that should be used. SINC's are a form of local sites
P.33 4.4	Add LRCs to Local Authorities and Agencies	Review of current data capture and use completed	Remove BRISC from Lead. SWT are a key stakeholder through the information we hold on wildlife sites in each local authority area and information on our own reserves	Clearer milestone needed
P.33 4.5	Ensure all local authority open space strategies incorporate policies and LBAP policies for the protection and enhancement of biodiversity	All strategies reviewed by target date (suggest 2007)	Many LINK bodies are stakeholders through their work supporting LBAPs	Clearer and more action centred wording needed

P.33 4.7			Greenspace Scotland remit means it should be lead organisation promoting this action	
P.33 4.8		Evaluate the effectiveness of green flag designations	Greenspace Scotland remit means it should be lead organisation promoting this action	
P.33 4.11			SWT is a stakeholder through our membership of the Scottish Greenspace Forum	
P.34 5.2		All estate management plans contain policies for the protection and enhancement of biodiversity New guidance produced on PPP projects setting out biodiversity requirements See 1.1 for overlap		Clearer more measurable milestones needed
P.34 5.3	Review NNRs, LNRs and urban SSSIs to determine scope for enhanced community involvement in planning and management	All plans reviewed By 2008	SWT and NTS are a stakeholder through ownership and management of a number of urban reserves	Change text to be more action specific. Milestone and timescale reflects ongoing process of updating management plans.
P.34 6.2			Add LAs as Lead Partners. Add BRISC as Stakeholder	
P.35 6.3	Cross reference and harmonise wording with similar actions in cross-cutting and ICE sections			Avoid duplication and confusion across the suite of plans
P.35 6.4	Cross reference and harmonise wording with similar actions in cross-cutting and ICE sections			Avoid duplication across the suite of plans
p.35 7.1	Develop a programme to identify and create new urban LNRs Produce guidance on encourage visits communities and minority groups	Programme developed in each LBAP area Guidance produced Footfall measured at selected LNRs No of sites identified and then designated		Action specific text required

p.35 7.2	Maintain and expand funding for community based greenspace projects and report annually on progress	Level of funding available in each local authority area		Addresses lack of clarity in wording
p.36 7.3	Develop an improvement programme for improving the biodiversity of canals, ponds and streams in urban areas	Programmes in place in each LBAP areas No of projects and area of canals & streams improved		More action specific with defined outputs that can be monitored
p.36 7.4	Cross reference and harmonise wording with similar actions in cross-cutting and ICE sections			
P36 7.7	Cross reference and harmonise wording with similar actions in cross-cutting and ICE sections			Avoid duplication and confusion across the suite of plans
p.36 7.8	Cross reference and harmonise wording with similar actions in cross-cutting and ICE sections			Avoid duplication and confusion across the suite of plans
p.36 7.10.	Promote the gardens for life initiative through; best practice for community gardens, mobile bus road show, information for people acquiring newly built homes and work with new house builders	HLF bid for mobile road show submitted 2005 Home owners leaflets produced Best practice advice on community gardens established		More action centred text focused on outputs is needed. This will aid delivery and monitoring
P.36 7.11	<u>Not Urban Specific</u> Disability is clearly a cross cutting issue that should be dealt with in another section of the plan		All SBS related promotional material and information DDA compliant Advice on making sites accessible produced Index of accessible reserves and other sites produced	Disability is an issue that goes beyond urban sites and will also affect communication actions in ICE.

3. Rural Plan

General Comments

Before addressing Q2, it is worth highlighting that the Rural Plan in particular suffers from poor presentation and inconsistency. For example, the headings used to organise the Issues and Rationale behind the Rural Implementation Plan actions (section 4.2) do not correspond with the sectoral descriptions used for the five working groups introduced in just the previous section. The actions within the Rural Implementation Plan must be organised under sectoral headings if they are to be successfully adopted and implemented. LINK BTF would not be able to accept this Plan in its current form and our comments are in a re-ordered format that relates directly to sectors. It is also particularly

important in the case of the Rural Implementation Plan that the Actions identify the appropriate Department or Group within the Scottish Executive as Lead Partner.

Within Section 4.2: Issues and Rationale, there are certain areas that require further amending or/and clarification. These are listed below in order of how they appear in the Implementation Plan.

Section 4.2.1 Describing 43% of farmland as being in agri-environmental scheme management is potentially misleading as the true figure is considerably less than this. The Rural Implementation Plan should be grounded in accurate base line data if it is to be an effective tool for biodiversity conservation.

Section 4.2.2, para 3. In addition to the challenges identified by this section, the Implementation Plan should also acknowledge the need for a long-term vision that recognises the influence of climate change on upland areas.

Section 4.3.1. Species and Habitats. The Rural Implementation Plan should include relevant key actions for the delivery of HAPs and SAPs targets. It is especially important that the implementation of UKBAP targets is achieved in Scotland now that the Scottish Parliament is monitoring progress. There must be concentrated action on UK HAPs and SAPs that will provide real biodiversity gain.

Section 4.2.5. Knowledge. In addition to the emphasis on ecological functioning, this introductory section should highlight the pressing need to address the monitoring and research needs of UK SAPs and HAPs.

Section 4.4. Future Directions. This section is especially brief and gives little indication as to how the Rural Implementation plan will evolve over the next 6 years. In addition to this, there is inconsistency in how the future directions are listed under the different SBS objectives. For instance, there is no reason why SRDP developments, such as Land Management Contract's should not be included under *both* the Species and habitats and, Landscape and ecosystems headings. The detailed comments under the Landscape and ecosystems subtitle that link future directions to specific actions are welcome and should be adopted for each of the other SBS objective headings.

Table 1.2 (This table identifies LINK BTF suggested changes to the Rural Implementation Plan – text in bold is additional and inserted comments. Where boxes are blank LINK BTF does not have any suggested changes.)

Item & Page	Changes to Action	Changes to Milestones	Changes to Stakeholders & lead agencies or monitoring	Rationale for proposed changes
AGRICULTURE				
P46 1.1.	No changes to action	Replace milestones with the following versions:	Specify LBAP <u>partnerships</u> (see general comments)	Milestones changed for clearer, SMARTer

		<ul style="list-style-type: none"> • Success of local schemes assessed and best practice examples identified. • Scottish (and where appropriate UK) good practice examples pulled together and distributed to farmers through appropriate mechanisms. • New local farmland initiatives in LBAP areas developed through agri-environment programmes 		<p>versions</p> <p>LBAPs are a document and not a stakeholder</p>
P48 2.1			Add Forestry Commission Scotland to stakeholders	
P49 2.6		<p>Recommend a second milestone:</p> <ul style="list-style-type: none"> • Links established with new SRDP and delivery mechanisms 	<p>Second milestone by 2007: SEERAD lead partner</p> <p>Remove SEERAD from 'stakeholders'. Add ENGOs</p>	Forestry is to be established as an important part of Land Management Contracts by 2007
P.50, 51, 3.1, 3.2	<p>Change action to:</p> <ul style="list-style-type: none"> • Develop effective collaborative landscape-scale planning initiatives between farms to further biodiversity objectives <p>Merge with action 3.2: remove the action specified under 3.2</p>	<p>Add the following milestones:</p> <p>Establish and pilot local agri-environment partnerships that have biodiversity objectives central to them.</p> <p>Natural Care programme reviewed against the needs of HAPs and SAPs</p> <p>The Natural Care programme has been adjusted to ensure it provides support where there are gaps in available funding for HAPs and SAPs</p> <p>Delete other 3.2 milestones</p>	<p>Milestones by 2005 Lead partner SEERAD.</p> <p>Remove CANH from stakeholders; they are part of SEERAD Add ENGOs to stakeholders</p>	Clarifies objectives and stakeholders
P.53 4.1	Change to: Ensure more effective targeting of agri-environment schemes to benefit key species and habitats	<p>Change to:</p> <p>Review agri-environment schemes to assess how well existing RSS prescriptions deliver biodiversity benefits for key species and habitats</p> <p>Evaluate how targeting of agri-environment schemes could be improved to maximise biodiversity and benefits for key species and habitats</p>	<p>Milestone by 2006</p> <p>Milestone by 2006</p> <p>Milestone by 2006</p>	<p>Action in consultation was vague and meaningless. Increased biodiversity benefits imply improved targeting of schemes to key species and habitats, or more prescriptions for specific species and habitats.</p> <p>Making these more</p>

		Ensure SRDP review and development of LMCs incorporates improved targeting of agri-environment funds to maximise biodiversity benefits for key habitats and species by 2006		<p>accessible to farmers implies as need for increased funding of schemes, or a lower ceiling on each application. We could not support the latter, but would support the former.</p> <p>In the absence of greatly increased funding for higher tier agri-environment schemes, we suggest that the key issue for these is one of targeting.</p> <p>Accessibility addressed through lower tier LMC schemes (Action 4.4)</p>
NEW ACTION	Develop and encourage collaborative approaches to deliver biodiversity benefits from agri-environment schemes.	<p>Carry out at least 6 collaborative RSS pilot schemes, at least 2 of which should have central biodiversity goals</p> <p>Evaluate the added biodiversity benefits from collaborative RSS applications, and the farmers' experiences of them by 2005</p> <p>Develop the means to facilitate and encourage collaborative application process post-pilot, and feed these into the evolution of LMCs by 2006</p>	<p>Milestone by 2005 Lead partner SEERAD</p> <p>Milestone by 2005 Lead partner SEERAD</p> <p>Milestone by 2006 Lead partner SEERAD</p>	Collaborative RSS applications were addressed in action 4.1, but these actions were too wide and general. A new action specifically addressed at collaborative approaches is needed.
p.53 4.2	Develop and improve the monitoring of agri-environment schemes	<p>Produce annual review of agri-environment schemes from 2005, and contribute to BAP recording</p> <p>Assess and, where necessary, improve the monitoring methods to allow specific biodiversity benefits of agri-environment schemes to be evaluated.</p> <p>Develop monitoring to</p>	<p>Ongoing Lead partner SEERAD</p> <p>Milestone 2005-06 Lead partner SEERAD</p> <p>Milestone 2005 Lead partner SEERAD</p> <p>Milestone 2005 Lead partner SEERAD</p>	The original action primarily relates to ongoing work, and it is hard to see what development this action would bring. We suggest that new wording would allow greater scope for additionality.

		incorporate LBAP data. Establish accurate and comprehensive baseline data.		
P.54 4.4, 4.5	Change to: Ensure that biodiversity is an important theme in each of the three tiers of Land Management Contracts (LMCs).	Monitor Tier 1 (GAEC) and evaluate its biodiversity benefits. Ensure that Tier 2 uptake is delivering an adequate balance of measures designed to protect and enhance biodiversity Develop regionally relevant biodiversity priorities for introduction to Tiers 2 and 3 Ensure that entry to Tier 3 agri-environment measures is conditional upon the inclusion of any relevant LBAP priorities Ensure that Land Management Plans contain audits of species and habitats, and have appropriately accredited biodiversity advice included in them.	Milestone 2005 Lead partner SEERAD Milestone 2005 Lead partner SEERAD Milestone 2007 Lead partner SEERAD Milestone 2006 Lead partner SEERAD Milestone 2007 Lead partner SEERAD	This actions has to have much SMARTER milestones, and be linked more specifically to each of the three LMC tiers.
P.55 4.10				No comments
P55 5.1	Add to action: “throughout all three tiers of Land Management Contracts”			
P56 5.2, 5.3	Change to: All SEERAD local agriculture staff provided with training in biodiversity requirements on current and future schemes.	All SEERAD area agriculture staff to have had appropriate training. Cross Cutting Programme: 2 Protecting species biodiversity is retained in SEERAD’s ABRG Research Strategy	Not clear what is meant by ‘SNH for SEERAD CANH Stakeholders’	
FRESHWATER				

<p>P46 1.2</p>		<p>Change milestones to: 'Soft engineering' risk based methods to enhance and contribute towards freshwater and wetland BAP habitats are designed and implementation started for engineering operations affecting water</p> <p>System implemented to ensure no deterioration in status under WEWS applies to all BAP freshwater and coastal habitats.</p>		<p>In order to ensure the Action fulfils its potential the first milestone should require the use of 'soft engineering' approaches to not only to enhance BAP habitats, but to also contribute to achieving BAP targets for species and habitats.</p> <p>This will apply to all derogations, including environmental objectives, and derogations to Heavily Modified Water Bodies / Artificial Water Bodies.</p>
<p>P 48 2.2,2.3</p>		<p>Sub basin advisory plans set up, including representatives from UKBAP working groups</p>	<p>No change to lead partners. For each, stakeholders should include ENGOs, and all competent authorities</p>	
<p>P56 5.4, 5.5</p>			<p>SEPA should lead on both these actions: all other lead partners stated should become stakeholders</p>	<p>Need a strong lead for the process in Scotland</p>
FORESTRY				
<p>P47, 48 1.3, 1.4</p>	<p>Delete action 1.4</p>			<p>Action 1.4 is being done already and inclusion in the SBS will bring no added benefits</p>
<p>P48 1.5</p>		<p>The extent and depth of this inventory should explore the possibility of updating and incorporating the Ancient Woodland Inventory (AWI), Scottish Native Woodland Inventory (SNWI), Native Inventory of Woodland and Trees (NIWT) and Land Cover of Scotland '88 (LCS88).</p>		
<p>P48 1.7</p>		<p>Future Direction: more research into the use of local provenance.</p>		

P49 2.4		Change milestone to include 'survey report produced' to show the results of the initiative		This action is being done anyway, so there seems no added value in including it in the SBS
P51 3.3		Within the Strategic Forest Habitat Network Plans priority areas, such as ancient woodlands, have been identified.		
P.54 4.8		System put in place to ensure development of the NIWT is coordinated with development of the Ancient Woodland Inventory		
UPLAND				
P49 2.7			Add SRPBA to stakeholders	
P49 2.8			Lead partner should be changed to SEED	Scottish Executive need to lead in pulling this together
P.50 2.9, 2.10	Delete 2.10 No changes to action for 2.9	Add milestone from (deleted) 4.9: Research and publish best practice guidance on managing public use of uplands and forests, including practical advice on balancing sustainable public use and biodiversity conservation	Add stakeholders to 2.9: SRPBA, Mountaineering Council of Scotland, Ramblers' Association Scotland	2.10 should be deleted: it is being undertaken by SNH anyway, there is no extra benefit from including it in this Plan. Otherwise, clarifies actions in this area by 'merging' milestones
P.52 3.6		Change to: Annual cross boundary meetings set up by LBAP partnerships to agree on co-ordinated management of shared habitats and species	Add National Parks to stakeholders	Ensures cross-boundary BAP issues are identified more widely
P53 4.3	Change action to: Evaluate links between biodiversity friendly deer management methods and market benefits, and develop guidance for deer managers.	Change farmers to deer managers	Stakeholders: Add Deer Commission for Scotland	This action should serve as a pilot for other sectors in future plans.
P. 54 4.6			Remove UK HAP SG from stakeholders	They should be in touch with the process anyway through SSG

P.55 4.9	Delete this action	Remove first two milestones Add amended third milestone to action 2.9 above		Links better with Outdoor Access Code
P55 4.11	No changes to action	Add another milestone: • Results integrated into UK HAP Review	SNH should lead, remove 'upland HAP group'. Add LBAP Partnerships to stakeholders	
P57 5.8	Add "links must be made to the development of Land Management Contracts"		Lead partner should be changed to SNH. Enterprise companies should be added as a stakeholder	
P57 5.9	No changes to action	No changes to milestones	SNH alone should be the lead partner for this action	
NE W AC TION	Improve Muirburn Code guidance for Land Managers.	Analysis of guidance needed. Dec 2005 Guidance produced May 2006 Guidance 2006 –2007.	LP: SEERAD Stakeholders: SNH, Heather Trust	Guidance is necessary to ensure effective implementation of the code and ensure comprehensive understanding.
NE W AC TION	Improve enforcement of Muirburn Code guidance.	Current enforcement measures reviewed and weaknesses identified. Dec 2005. Improved enforcement practices put in place Dec 2007	LP: SEERAD Stakeholders: SNH, Heather Trust.	Guidance and support must be backed up by enforcement.
OTHER ACTIONS				
P.51 3.4	Move this to the Cross-Cutting Issues plan Change action to: Identify and reduce threats to rural biodiversity from climate change	No change to milestone		
P.52 3.7	Move this to the Cross-Cutting Issues plan Change action to: • Sustainable soil strategy adopted whereby existing legislation related to planning guidelines, environmental and cultural designation and agri-environment			Clarifies action

	schemes is amended to include soil and soil biodiversity protection			
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4. Marine Plan

General Comments

Scottish Environment LINK Biodiversity Task Force (hereafter referred to as LINK BTF) broadly supports the Marine Biodiversity Implementation Plan (MBIP), particularly the ethos that biodiversity protection should underpin economic activities rather than be considered in isolation: a healthy, fully-functioning marine ecosystem is, after all, the foundation for the maritime activities that make a comparatively large contribution to Scotland's economy. If fully implemented as it stands - including integration of biodiversity into other existing marine initiatives, identification of a lead marine policy body, introduction of a SMART¹ marine strategy and marine spatial planning, protection of nationally important species and habitats and introduction of fit-for-purpose framework legislation - the MBIP could deliver lasting benefit to Scotland's marine biodiversity, and the economic activities and communities that depend upon them.

Allowing the current fragmented and ineffective management of our seas to continue is not an option, leading only to short and long-term economic costs resulting from damage to Scotland's world-class marine environment. Only by introducing the policy, legislative and structural improvements detailed below can the recent Ministerial commitment 'to work for clean, healthy, safe, productive and biologically diverse marine environment which will continue to support the interests of nature and people' be fulfilled.

LINK BTF believe that in the interests of marine biodiversity and sustainable marine management, it is essential that a number of actions are prioritised:

Sect.5.3 Current Activities

Although the list of **Actions** in section 5.3 are not in the gift of the Scottish Biodiversity Forum to deliver, LINK BTF believe that these actions should still be considered an integral part of the MBIP.

Marine biodiversity should be at the core of all existing Scottish marine initiatives (Scottish Sustainable Marine Environment Initiative 'SSMEI', Scottish Strategic Framework for the Marine Environment, ICZM stocktaking, Scottish Inshore Fisheries Review, Strategic Framework for Scottish Aquaculture etc) to secure a sustainable future for the economic activities that rely upon it.

The MBIP must be used as a benchmark against which to measure the progress of the MBIP itself and all parallel marine initiatives towards safeguarding Scotland's marine biodiversity. Co-ordination within the Scottish Executive, between SE and the Statutory Agencies and, since the sea knows no boundaries, between the SE and the UK

¹ SMART: Specific, Measurable, Achievable, Relevant, Time Based.

administration through DEFRA, DTI and DfT, is essential. The Scottish Executive Marine Environment Co-ordination Group (SECG) is a welcome first step towards improved co-ordination.

Marine 1.1 Establish a marine policy body

As outlined when responding to the Scottish Strategic Framework for the Marine Environment Initiative, the LINK BTF believe a national decision-making 'body' to oversee marine strategic and spatial planning of devolved activities in Scottish waters in co-ordination with a UK body responsible for reserved matters is needed. The Scottish body should have statutory responsibility for the preparation, implementation and evaluation of a marine strategy and spatial plan(s); powers to decide national priorities, co-ordinate sectoral activities, review policy, oversee enforcement of agreed activities, allocate budget, work with UK bodies on reserved issues, collect and exchange information and ensure the active involvement of stakeholders at all levels. This body need not be a new quango, but could be drawn from existing Scottish Executive departments or agencies. It would be responsible to a nominated Scottish Minister who would lead on, champion and co-ordinate marine affairs within Government.

Marine 1.4 Review suite of marine Species and Habitats Action Plans relevant to Scotland

Marine 1.5 Continue work to meet targets in existing suite of marine Species and Habitat Action Plans relevant to Scotland, identify any further major blockages to action on these plans, and work with MBTF to address these blockages

LINK BTF believes Biodiversity Action Plans are of minimal use in protecting biodiversity if their delivery is not supported or funded, if there is no policy framework into which they can fit, and if they overlook key Scottish species or habitats.

Marine 3.1 Establish an effective strategic and spatial planning system for marine waters taking biodiversity fully into account within an ecosystem approach.

LINK believes at present there is no effective spatial planning in the marine environment. 'Forward plans', where they exist, are dispersed amongst different agencies - there is currently no integrated national plan, or hierarchy of plans linking national and local priorities, as in the land-based system.

Marine 3.2 Begin work to establish a network of well-managed marine protected areas

The LINK BTF believes a site-based approach to protecting key habitats and species must include those of both national and international importance. Currently the only form of marine protected area is the limited number of cSAC sites. It is frustrating that little progress has been made in the establishment of Marine National Parks (MNP). However, eventual MNP designation would not preclude the need for some form of site-based protection for nationally important wildlife, habitats and features in Scottish waters or the

urgency with which the truly marine SACs and SPAs should be designated out to 12nm. Although the Review of Marine Nature Conservation (RMNC) is developing criteria for identification of nationally important marine species, habitats and ecosystems, no such work is underway in Scotland. The SSMEI piloting phase is the ideal opportunity to trial these criteria and must take more consideration of nationally important marine sites.

It is also important that some marine protected areas prohibit ALL human resource exploitation activity to safeguard particularly sensitive sites and species, allow regeneration of species (including commercially important fish and shellfish) and provide scientific baselines against which to measure the health of neighbouring multi-use marine areas. Furthermore, to ensure human activities are managed to mitigate against biodiversity impacts outside designated areas, the site-based approach must fall within the broader framework of an integrated marine strategy and marine spatial plan.

Marine 4.1 Introduce any changes needed to **ensure that the current legislative, policy and organisational framework is fit for purpose** in conserving marine biodiversity

LINK BTF believes it is necessary to improve existing marine management and that this can only be truly achieved through the production of a Marine (Scotland) Act.

To ensure better protection of our marine biodiversity, LINK BTF believes that management of all activities in the marine environment must be integrated. Integration requires a SMART marine strategy, a dedicated lead marine body, marine spatial planning, local input to spatial planning and resource management, a Duty of Care on all agencies making decisions in the marine environment, adequate and available scientific information and adequate resources to implement all of the above.

5. Local Delivery Implementation Plan

Introduction

The success of the Local Delivery Implementation Plan requires a supporting structure that facilitates the links between the international, national and the local. The current structure for biodiversity delivery in Scotland does not adequately support these important links and could limit the efficacy of many of the actions in this Implementation Plan. The work of the Local Biodiversity Action Plan Co-ordinator is very important in this area and the post provides a very important link between Lead partners and LBAPs, as well as identifying and promoting best practice and common standards.

It is also important to understand the context of LBAPs within the UKBAP and their role in delivering actions for UK Priority Species and Habitats. In most cases LBAP priorities incorporate some UK priorities, but LBAPs are not always in a position to deliver actions for UK priorities. Many LBAPs focus their efforts on a small subset of the UKBAP priorities in their area, alongside priorities set at a local level. The audit document in most LBAPs identifies which of the UK priorities occur in their area and identifies additional biological priorities at a more local level. However, LBAPs do not always write Action Plans for UK species for their area. This does not mean species and habitats without a local Action

Plan are actually a lower priority for local actions but simply that, with limited resources and time, LBAPs are only able to focus on a few selected species. For example, an LBAP audit may identify Black Grouse, Capercaillie and Lapwing as locally occurring UK Priority Species but may only write an Action Plan for Lapwing due to limited resources and staff time. Work on Capercaillie and Black Grouse in the LBAP area is still a priority but it will not be coordinated through the LBAP steering group.

Local Delivery Action 1.4 Suggested Lead Partner for this action must include all LBAP lead parties and local authorities.

Local Delivery Action 2.5 The milestone for producing guidance on 'key species and habitat groups' should state that HAP and SAP Lead Partner organisations are to deliver guidance for LBAPs.

Local Delivery Actions 3.3 and 3.4 The Biodiversity Task Force welcomes the inclusion of these actions in the Implementation Plan. These actions should be combined to cover organisational and communication links between the cited bodies. The Biodiversity Task Force proposes the additional specific Milestone and Lead Partner.

Suggested Milestone: Reviewed existing structures and revised to improve communication links. 2004.

Suggested Lead Partner: Scottish Executive.

Local Delivery Action 4.1 and Local Delivery Action 4.2

The Biodiversity Task Force welcomes the inclusion of this action in the Implementation Plan but suggest that these actions are amalgamated to read:

Action: Increase profile of LBAPs locally

Suggested Milestone: LBAP partner press officers hold LBAP details and are aware of them

Suggested Lead Partner: Scottish Executive

Local Delivery Action 5.1 The Biodiversity Task Force recognises this Action as being important in securing the delivery of the LBAP process. It is suggested that an appropriate date for the completion of this Action is 2006. **Local Delivery Action 5.1** would appear to be an unnecessary and, less SMART replication of **Action 5.2**. To ensure clarification and to make the Implementation Plan usable such replication should be removed.

Local Delivery Action 6.3 The Biodiversity Task Force strongly supports this action but recommends that new habitat surveys carried out to support the SBS focus on recording Broad and Priority habitats as set out in the UKBAP. This Action should be clarified to say: 'Complete Priority Habitat data available for Scotland'.

Suggested Milestones

Assess current coverage of phase 1 survey data (2005)

Translate from phase 1 to Priority habitat classes (2006)

Computerise habitat data for target habitats and make available through NBN (2005)

Design national re-survey programme (2006)
Re-survey high priority areas (2007)

Suggested Lead Partners: add SEPA
Suggested Stakeholders: add BRISC

6. Cross-Cutting Implementation Plan

Introduction

The Biodiversity Task Force of LINK supports the development of the Cross-cutting Implementation Plan as a means of integrating the work of different policy sectors to achieve biodiversity benefits. We agree that the plan needs a significant amount of work if it is to be effective in removing policy level obstacles to biodiversity conservation and ensuring successful integration of SBS objectives. Implementation of the provisions of the Nature Conservation (Scotland) Act 2004 should be a clear priority within the cross-cutting section.

The effectiveness of the Cross-cutting Implementation Plan depends on the actions being underpinned by a clear rationale and a sound appreciation of issues. To this end, we have commented here on section 7.2 before addressing the individual actions. Its effective implementation also requires the plan to be user friendly, which its current organisation prevents. It is currently very difficult for lead partners and stakeholders to implement actions simply because actions relating to single themes or sectors are not grouped together. A planner, for example, would need to read the entire plan to pick out the relevant actions as it stands, which means that actions are likely to be missed.

- **Sect. 7.2.1 Species & Habitats**

If the Scottish Biodiversity Strategy is to meet its objective of halting the loss of biodiversity through targeted action, its Implementation Plans must identify actions to ensure it becomes fully integrated with the UKBAP process. In addition, the Cross-cutting IP must describe the need for the Scottish biodiversity process to engage with the Scottish, and where appropriate UK, BAP working groups. It is also of considerable importance that the production of a Scottish list of priority species and habitats be fully integrated with the current review of the UK BAP list. The Nature Conservation (Scotland) Act 2004 makes it clear that a list of priority species and habitats for Scotland must be produced in 2005. However, it is important that the process and rationale be reflected in the UK priority Species and Habitat list, due for revision in 2006.

HAPs and SAPs should incorporate actions that encompass many of the principles of sustainable development that the SBS seeks to adopt and the UKBAP review in 2005 must help achieve this necessary integration. HAPs and SAPs need to be able to resolve the conflicts facing land managers, provide effective conservation and help secure social and economic objectives. For example, the corncrake SAP attempts to address the agricultural and financial hurdles, which limit farmers and crofter's ability to conserve corncrakes, by providing solutions to support this important stakeholder group. Distilling

these cross cutting policy issues from HAPs/SAPs therefore sets a framework for policy action. Furthermore, the UK BAP plans and their steering groups are able to provide valuable advice on what needs to be done and how to achieve it and if we are to meet the overall aim of preventing species and habitat losses, the expertise from these HAP/SAP groups must be incorporated in the Implementation Plans.

Strategic Environmental Assessment will greatly assist integration of biodiversity into policies by encouraging Scottish Executive Departments and Government Agencies to assess policies and plans against biodiversity needs. The IP should contain actions for Government Departments and Agencies, to help tackle the generic policy blockages identified by HAP/SAP lead partners.

- **Sect. 7.2.3. Landscapes and Ecosystems**

This section should identify the opportunities under the Natural Care scheme alongside those offered by the agri-environment and forestry grant schemes. The section should also clarify what it means by the 'spatial requirements of biodiversity action plans' as this is unclear and could lead to confusion.

- **Sect. 7.2.5 Knowledge**

The second paragraph of this section should highlight the importance of establishing a more comprehensive understanding of the extent, condition and ecology of UK HAPs and SAPs. The targeted delivery of biodiversity conservation must be built on a sound ecological footing. In too many cases, we still do not know enough about species and habitats of priority conservation concern in Scotland.

Third paragraph. Information management systems for data on species and habitats require further co-ordination and linkage. There are opportunities for much more effective data sharing between data custodians, including local authorities, national agencies and NGOs, through partnership working and adopting common standards and procedures. The National Biodiversity Network (NBN) provides a framework and the tools and standards needed to share data and should be more actively supported and developed in tandem with organisations' own data management systems. The local element of the NBN comprises Local Records Centres, which already play an important role in capturing data collected by individuals and local organisations and in strengthening decision support systems at the local level but which require enhanced national support to meet fully the requirements of the SBS.

LINK welcomes the production of the SBS Draft Research Strategy. However, if the research strategy is to be an effective tool in supporting the delivery of the SBS it cannot be left to stand-alone. The Implementation Plans must link to the Research Strategy and contain actions that ensure it is effectively acted upon.

- **Climate Change**

Climate change is one area where the implementation plan must be re-organised into sectors. This part of the plan should include a clear rationale explaining the issues and objectives to accompany the actions on climate change (see actions 5.2 and 5.3 plus new

suggested actions). Actions relating to Air Quality and transport need to be separate from those that fall under the climate change section (actions 4.7, 4.9, 4.12) to make the plan easier for lead partners and stakeholders to use and implement.

Climate change is potentially the biggest threat to biodiversity this century, with some alarming predictions having been made for species and habitat extinctions if we fail to deliver significant reductions in 'greenhouse gas emissions' (e.g. Thomas *et al.* Nature 427, 145-148, 2004). In Scotland, the effects of any changes such as increased storm events, temperature increase, inland flooding and sea level rise could have major consequences for our biodiversity. Considerable action is already underway as part of the Scottish Executive Climate Change Programme to help address climate change but more needs to be done for biodiversity both in helping address climate change and in adapting to it. There are two key areas of action suggested for implementation under the Scottish Biodiversity Strategy and suggested new actions are given in the cross cutting implementation plan below.

1 - Mitigation

Action to help mitigate/ reduce the severity of climate change through reducing greenhouse gases is now a priority for Governments with major steps towards renewable energy and energy efficiency to help achieve this. Biodiversity itself has a role to play in this work, for example the restoration of damaged peatbogs to help reduce carbon emissions.

Public interest in biodiversity can be a useful tool in convincing people to make lifestyle changes to help reduce greenhouse gas emissions.

Efforts to tackle greenhouse gas reduction such as renewable energy development and biofuel production can bring new threats to biodiversity. The Biodiversity strategy should require that efforts aimed at mitigating climate change are carefully assessed and planned to help achieve climate change goals without further harm to biodiversity.

2 – Adaptation and resilience

Even with significant mitigation efforts, the changes to our climate, although reduced, could still affect biodiversity and indications are that we are already experiencing some change. One of the main conclusions from initial analysis of biodiversity and climate change is that we have insufficient information about species and habitats trends to make clear predictions. We urgently need more monitoring and analysis of trends before being able to determine the impacts of climate change. Biodiversity can provide a useful indicator of climate change, with long-term species and habitat monitoring work giving early warning of changes. Further research and analysis will then be required to help manage habitats to enable species to adapt to changes. While it is too early to advocate major changes to existing wildlife conservation measures, the principle of facilitating change and enabling movement through the landscape, needs to be incorporated into all land management schemes and projects. This means that sufficiently large scale habitats and habitat networks need to be protected and managed appropriately. In addition, risk assessment techniques can help land managers prepare for climate change within the

realms of uncertainty and this approach has been encouraged by Government to help prepare land managers in adapting to climate change.

For many key habitats and species, the most immediate step is to tackle degradation and past damage so that they are in a robust state to face the changing climate. Habitat conservation work can also help provide positive economic and social solutions in dealing with changes, such as incorporating wetland ecosystems in flood defence schemes and helping protect our coasts through natural habitat restoration.

As well as the direct effects of climate change on biodiversity there are potential impacts on changing land use such as planting of new crops or changes in the timing of agricultural activities as a result of climate change. These indirect effects of climate change should be considered along with the direct effects and research needs to be targeted accordingly.

Table 1.3 (This table identifies LINK BTF suggested changes to the Rural Implementation Plan – text in bold is additional and inserted comments. Where boxes are blank, LINK BTF does not have any suggested changes.)

Action & Page	Amended Action	Amended Milestones	Rationale for proposed changes	Changes to Lead Partner or stakeholders
Inserted Action 3.4 from Rural IP				
Inserted Action 3.7 from Rural IP				
Act. 1.1 P104	Create list of Scottish Priority Species and Habitats by 2005	Criteria for identification of priorities generated by 2004. Prioritise identified by 2005.	Nature Conservation (Scotland) Act 2004 requires a list of priority species and habitats to be in place one year after the bill itself received royal ascent. A review of the UKBAP species and habitats is underway, through the BRIG sub group chaired by Joanna Drewit	LP: SE Stakeholders: remove LBAPs, add APSG

NEW ACTION	Support and advise on the adoption of the BARS recording system.	Training & support provided to LBAPs to ensure full use of BARS in UKBAP review 2005. BARS established and used as UKBAP reporting mechanism for lead partners & LBAPs.	BARS provides an integrated UK system for continuous recording and sharing of information. Facilitating the sharing of data and knowledge is essential for the SBS to deliver.	LP: SNH & JNCC
Act 1.2 P104			JNCC already lead on this action on a UK basis and given that this is a UK action, it would make sense to recognise this by giving JNCC lead partner status. Scottish target review: is being undertaken by Lead Partners in Scotland and fed through the UKBAP target review process. Again there is no need to replicate reporting needs in Scotland when the system is already working across the UK as a whole.	Stakeholders: Remove LBAPs – just refer to BAP partners – and remove replication this captures.
Act 1.3 P104	Enhance current implementation of HAP/SAP Action Plans	Remove the proposed production of a strategy for implementation. Using the UKBAP database, actions in BAP analysed to identify cross cutting actions and convey to Implementation Team. Integration of SAP and HAP targets by 2006. Enable HAP steering groups to tackle policy, research and coordination barriers to UKBAP implementation.	The production of another strategy is unnecessary. For clarity and ease of use, the IP is improved by bringing together Act 1.3 and Act 1.4. Rationalisation of SAPs and HAPs would be useful and could be implemented following the UKBAP review. This is an important action for SBS to address through its 4 th objective: integration and coordination.	LP: Lead Partners Stakeholders: Public Bodies and LINK

Act 1.4 P105	See Action 1.3			
Act 1.6 P105				Stakeholders: Royal Botanic Garden Edinburgh and the Henry Doubleday Research Association.
Act 1.7 P105		<p>Provide management guidance alongside codes of practice for sensitive environments, including lochs, ports and new planting schemes.</p> <p>Promote codes of practice for important sectors.</p> <p>Identify pathways of introduction and put barriers in place to counteract escape.</p> <p>Introduce risk assessment for non-native species as they come into use. Model is already in place for plants hazardous to human health, implemented by Kew and Horticultural trade association.</p>	Implements the precautionary principle	LP: RBGE
Act 1.8 P105		<p>Use the 2004 Scottish Executive Consultation on the Scottish implementation of the GB review of policy on non-native invasive species to identify priority measures needed in Scotland by 2005.</p> <p>Implement prioritises actions as above by 2007.</p>		Stakeholders

<p>Act. 1.10 P106</p>	<p>Assess the condition of all Designated Sites through the UK-wide programme of site condition monitoring and develop a strategy for further progress.</p>	<p>Report produced describing the condition of all designated sites.</p> <p>Deliver favourable status on 75% of all designated sites by 2008</p> <p>Identify the main constraints to achieving favourable conditions status of designated sites</p> <p>Scottish Executive and SNH agree a Service Level Agreement on SSSI monitoring and favourability targets by end 2005</p> <p>Address these restraints through action 12.3 and UKBAP review in 2005</p> <p>Strategy developed based on management plans and ensuring local delivery.</p>	<p>The action should be for all designated sites.</p> <p>It is realistic in 4 year period to review current process and build on results to implement a new one delivering local benefits to species, habitats and local communities.</p>	<p>LP: SNH and SEERAD</p>
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NEW ACTION	Assess and develop appropriate re-introduction proposals, using IUCN/SSC Guidelines for Re-introductions, to support Annex IV Article 22 of the EU Directive Habitats Directive and Article 11 of the EU Birds for species previously native but now extinct in Scotland or part of Scotland	Decision on application license for re-introduction of the European Beaver made by the Scottish Executive (Early 2005) A strategic plan for assessing, licensing and funding proposed species reintroductions, both those proposing to reintroduce species to Scotland, and those where Scotland holds the proposed source population, developed and implemented (August 2006) Research conducted identifying, against the IUCN/SSC Guidelines for Re-introductions, species, native but currently absent from Scotland as a result of human activity, that might be candidates for future reintroduction programmes; to assess their potential role in advancing Scotland's biodiversity; and to assess re-introductions in other European countries and their relevance to Scotland (2007)		LP:SNH Stakeholders: NGOs SEERAD Royal Zoological Society of Scotland
Act 2.1 P106			This action should be integrated to the ICE plan where there are already a suite of similar actions (6.2, 7.2 & 8.2).	
Act 2.2 P107	Enterprise and industry sectors contribute to biodiversity objectives.	Report produced detailing how Enterprise and industry have contributed to biodiversity objectives of the SBS.	Without an effective lead, this action is in danger of faltering at the start. It needs strong Executive lead to demonstrate commitment and to ensure effective engagement.	LP: SE – but which department?

NEW ACTION	Provide steering and advice to help industry contribute to biodiversity	Advice produced collaboratively with business community. Use of advice is reviewed and changes made accordingly on an annual basis.	Guidance is needed.	LP: SE – but which department?
Act 2.3 P107	Enterprise companies to deliver biodiversity duty	Local enterprise companies given direction to include biodiversity targets in their annual plan for economic development.		
Act.3.3 P108	Remove action		Remove action and see additional milestones for 4.3	
Act 4.1 P108	Ensure all public bodies understand and comply with the biodiversity duty under the Nature Conservation (Scotland) Act.	Reports produced by public bodies on systems in place to deliver biodiversity duty. Guidance produced for public bodies and enterprise companies.	The action has been rewritten to ensure it is effective in delivering the SBS. In its original form the action required greater awareness of the biodiversity duty, the action must go beyond this and require delivery of the duty.	
Act 4.4 P109		National planning framework reflects biodiversity objectives. Advice produced for local authorities on ecological and planning mechanisms for restoring habitats.	Milestones have been reworded to help make the action a SMART and effective means of delivering the objectives of the SBS.	

Act. 4.5 P109		Existing network of non-statutory sites reviewed and evaluated against common standards (2007). Non-statutory site data integrated into Planning decision support tools in most local authorities (2008)		
Act 4.15 assessed using the best available data on the location and quality of priority species and habitats.	Date changed to 2007	text added to action. Actions must be built on the best possible available biodiversity data.	
Act. 4.16	Produce guidance under the Nature Conservation (Scotland) Act 2004 and SEA to guide LAs in protecting and enhancing biodiversity in all their functions.	Date changed from 2005	This action should extend beyond consideration of biodiversity in Development Plans.	LP: SEERAD
Act 5.4 P112	Action unclear – delete or amend			Stakeholders need to include NERC and Scottish Universities
Act 5.5 P112	Support research to allow BAP targets to be met and to enable monitoring of progress towards biological objectives.	Review and publishing of Scottish Biodiversity Research Strategy in 2006. DRS needs to include SMART actions and milestones DRS needs to be a funded research programme aimed at supporting and delivering biodiversity action in Scotland. DRS needs to be coordinated with the SEERAD research programme.		LP: Scottish Executive Stakeholders: Research funding bodies

Action 5.6 P112	Provide sectoral biodiversity guidance targeted to user needs	Publicly funded advice provided to farmers and crofters through SEERAD advisors and FC		
Act 5.7 P112	Strengthen the management and sharing of data between national bodies through using the National Biodiversity Network to exchange data and through encouraging the adoption of NBN data standards by other data holders, including LAs and LRCs.	All national bodies with significant data holdings sharing data on Priority Species and Habitats through the NBN (2006). A complete network of LRCs in places to capture and deliver local data to NBN standards (2007).	Access to data remains a critical constraint for setting priorities and targets, and for monitoring, surveillance and reporting. Access could be greatly improved if all national bodies collecting and using biodiversity data used the National Biodiversity Network to share data where appropriate. Capturing and delivering data at the local level will require a network of Local Records Centres working to NBN standards.	LP: Add SE Stakeholders: SEPA, FCS, CoSLA, BRISC, RSPB, SWT, NTS, LRCs, Lead partners, NBN
Act. 5.8	Implement a Monitoring Framework to co-ordinate the collection of data required to monitor biodiversity indicators and targets and promote the sharing of these data, using the National Biodiversity Network and BARS as appropriate, to provide a complete view of the location, status, extent, quality and trends for species populations and habitats.	Scottish Biodiversity Monitoring Framework drawn up (2005). Monitoring and surveillance data being shared through NBN or BARS for all stakeholders' benefits (2007).	Surveillance and monitoring are critical for prioritising and evaluating actions for species and habitats, yet lack of this information is a significant limitation in around one third of SAPs. Resource and skill limitations necessitate working in partnership to draw up a Monitoring Framework that will make the best use of taxonomic skills and knowledge to support (1) target and priority review, (2) reporting against local, Scottish and UK targets, (3) reporting on indicators.	LP: Add SE, SNH, SEPA

NEW ACTION	Publicise four new key habitat restoration projects (e.g. upland, woodland, wetland and coastal) to act as good practice case studies.	Four habitat restoration plans produced - 2007	Most of the UK BAP habitat plans include targets for restoration and/or expansion. Many of these are relevant to Scotland but progress on these targets has generally been limited. Developing flagship habitat restoration/expansion projects could do more than help to deliver these targets. If developed with imagination and commitment they could provide ecologically services eg flood control and act as good practice examples. This action should be a major contribution to the respective UK HAP steering groups.	<p>LP: SNH, SEERAD, SEPA, FCS</p> <p>Stakeholders: NGOs</p>
NEW ACTION	Produce a funding strategy for BAP habitat conservation	Funding strategy produced - 2006	The delivery of some BAP habitats targets, e.g. peatlands, is not currently funded through government grant schemes. This funding strategy should identify existing sources of funding and any gaps for the revised habitat targets, it should also propose how any gaps should be filled (particularly in light of changes to EU funding mechanisms).	<p>LP: SEERAD</p> <p>Stakeholders: SNH, SEPA, FCS</p>
NEW ACTION FOR CLIMATE CHANGE SECTION	Use biodiversity conservation to assist in reducing greenhouse gas emissions.	<p>Executive Climate Change Programme recognises the important role of peatbog restoration in helping stem release of stored carbon.</p> <p>Launch campaign to enable people to lower personal contributions to greenhouse gas emissions</p>	Action to mitigate / reduce the severity of climate change through reducing levels of greenhouse gases is a priority for government.	Lead partner: SEERAD

NEW ACTION FOR CLIMATE CHANGE SECTION	All renewable energy developments to be assessed in terms of biodiversity conservation.	Risk and impact assessment carried out for all energy proposals. SEA carried out for all energy developments.		
NEW ACTION FOR CLIMATE CHANGE SECTION	Improve understanding of species & habitats actual & likely responses to climate changes	Support and promote the monitoring of species and habitats to detect changes in response to climate change (including promoting public participation in phenology schemes) Use of BARS provides accessible monitoring data for analysis of change Research and analysis of spp/habitats to determine likely future impacts of climate change Climate change models reflect UKBAP priority species and habitats	There is still insufficient information on changes to biodiversity and analysis of current trends.	Lead: SEERAD Stakeholders: MONARCH project
NEW ACTION FOR CLIMATE CHANGE SECTION	Support biodiversity managers in adapting spp/habitat management in response to climate change	Provide training and advice to biodiversity managers on risk management for climate change Promote continued restoration/recovery of spp/habitats to improve chances of coping with climate changes stresses Incorporate large scale habitat management and improve buffering/connectivity in land management schemes	Managers need information on how to manage priority species and habitats in the face of climate changes. This should be provided through direct information & guidance as well as through demonstration schemes.	Lead SEERAD
NEW ACTION FOR CLIMATE CHANGE SECTION	All renewable energy developments, including biofuel production, are assessed to ensure biodiversity is not endangered / harmed	Risk and impact assessment produced for new biofuels and other renewable energy schemes is in place. SEA is used to ensure that biodiversity interest is conserved alongside developments through renewable energy initiatives.	All renewable energy schemes need to be beneficial both in producing alternative energy sources but also in conserving biodiversity.	Lead SEERAD

Biodiversity Task Force, Scottish Environment LINK

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