

# SNH Species Framework '*Making a difference for Scotland's species: a framework for action*'

## Response from LINK's Biodiversity Task Force

This statement is supported by the following organisations:

Butterfly Conservation Scotland  
Marine Conservation Society Scotland  
National Trust for Scotland  
Ramblers Scotland  
RSPB Scotland  
Plantlife Scotland  
Scottish Wildlife Trust  
Scottish Native Woods  
Scottish Raptor Study Groups

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LINK's Biodiversity Task Force welcomes the opportunity to comment on the draft Species Framework. There is considerable expertise in species focussed management within LINK and several member bodies have helped pioneer successful and innovative species conservation and control methods over a period of many decades.

1. We broadly **support the aims and objectives of the Framework** and welcome the emphasis on conserving and managing species as "components of habitats and ecosystems".
2. We see the Framework as an important means of focusing conservation action. However, when it is revised it must be **linked to the UKBAP and the Scottish Biodiversity List**. As such, the Framework should set out its lifespan, when it will be reviewed and how SNH propose to report on its delivery.
3. We believe the Framework provides the opportunity for SNH to demonstrate to other public bodies, how they can very practically deliver their **biodiversity duty** under Section 1 of the Nature Conservation (Scotland) Act 2004, while recognising that other government agencies and NGO's are also drawing up their own priority lists. All such lists need to be clearly drawn from the Scottish Biodiversity List and their primary purpose must be to work towards halting the loss of biodiversity in Scotland by 2010.
4. We have concerns over **funding** for the Framework which must be adequately resourced if it is to deliver. The publication of the Framework represents a statement of purpose and intent to deliver focused conservation action from SNH. If this is to be implemented there should be a supporting estimate of resource requirements and a description of how the framework will be incorporated into SNH's operations. Furthermore, we call for **costed action plans** to be drawn up for those species that are listed within the Framework that are not already UKBAP species.
5. We have some specific concerns over the subjectivity and **lack of clarity in the criteria** used in the selection of species for the Framework. We request that when the Framework is revised the criteria are revisited, clarified and reapplied to

the UKBAP and Scottish Biodiversity List. This would be particularly welcome in regard to under-represented marine species. The application of these criteria should be transparent and allow stakeholders to follow the process through to the finally selected species.

6. We suggest that the recommendations in **Defra's non-native species review**<sup>1</sup> should be cross referenced in the text and used to more clearly define the scope of criteria 2 (page 14).
- 7 We feel that the **ownership** of the document is unclear and needs to be made clear in the introduction. The Ministerial foreword would suggest this is a Scottish Executive Framework but it is labelled as an SNH consultation. Eitherway, delivery of the Framework must be through an **integrated approach across a number of agencies and departments** if it is to be successful.

Thank you for providing LINK's Biodiversity Task Force with the opportunity to comment on the Framework. If you wish to discuss any of the points we have raised please get in touch.

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<sup>1</sup> <http://www.defra.gov.uk/wildlife-countryside/resprog/findings/non-native/report.pdf>