

UN Sustainable Development Goal Delivery in Scotland: Call for Evidence

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Scottish Government
Riaghaltas na h-Alba
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What this survey is

This survey is one of a number of ways in which we are engaging with people across Scotland on Scotland's National Outcomes, the UN Sustainable Development Goals (SDGs) and how best to approach achieving them.

Your views will inform development of our overall approach to implementing the National Outcomes and SDGs in Scotland as well as how we will report on this within the UK Government Voluntary National Review (VNR).

You can read more about the SDGs and VNR on the SDG Network Scotland website.

How to respond

You can respond to this survey by **Wednesday 27 February** if you would like to inform development of the UK Government Voluntary National Review (VNR).

Most of this survey take the form of open text responses to prompt questions. This allows flexibility in how you respond. However we would be grateful if you could address your responses to the prompt questions as much as possible.

This survey will remain open after that point until **Friday 29 March** if you are not interested in or unable to contribute to the UK VNR deadline but would like to inform longer term considerations around SDG implementation in Scotland, including a potential Scottish Supplementary Review.

You can either complete the questions in this document and return it by email to nationalperformance@gov.scot or [complete the online version of the survey](#). The questions are the same in both.

Confidentiality

Responses from individuals will be treated confidentially and the data held securely. You will be asked during the survey if you consent for your response to the call to be published on <https://globalgoals.scot> once the exercise is complete.

Organisational responses providing potential content for the VNR may necessarily involve identifying specific organisations or sectors for Scotland's VNR contribution (for example, in terms of describing networks and partnerships working to realise the Goals).

1. Your details

Please indicate if you are responding as an individual or on behalf of an organisation:

- I am responding as an individual
- I am responding on behalf of an organisation

Your name

Daphne Vlastari

Your organisation (if responding on behalf of an organisation)

Scottish Environment LINK

Email address

daphne@scotlink.org

Phone number

0131 225 4345

Are you a member of the SDG Network Scotland?

- Yes
- No

Please indicate if you are happy to be contacted by the SDG Network Scotland about further opportunities to participate in the SDG agenda

- I am happy to be contacted by the SDG Network Scotland
- I do not want to be contacted by the SDG Network Scotland

2. Scotland's approach to the UN Sustainable Development Goals 2030

Through the VNR we are expected to report on the national policy and delivery infrastructure we currently have in place to progress the SDGs.

In this section we would like to seek your views on the effectiveness of this and what improvements you think need to be made.

What are you doing?

Please tell us what actions or projects you are currently undertaking to encourage others to be involved with meeting the [SDGs](#).

These can be small or large. Local, national or international.

When responding, please include detail on (where possible):

- **Name** of the project (and a web address if available)
- The project's **purpose**
- The **SDG Goals or targets it contributes to**
- Your observations **on its results, learning, or challenges**

Scottish Environment LINK is the forum for Scotland's voluntary environment organisations, with over 35 member bodies representing a range of environmental interests with the common goal of contributing to a more environmentally sustainable society.

LINK provides a forum for its member bodies facilitating and enabling informed debate, information-sharing, discussion and joint action. LINK assists communication between member bodies, government and its agencies and other sectors within civic society. Acting at local, national and international levels, LINK aims to ensure that the environment is fully recognised in the development of policy and legislation affecting Scotland.

Promotion of engagement with the SDGs

Can you suggest ways in which we could promote engagement in the SDGs more widely across Scotland? In particular how can we ensure no one is left behind with SDG implementation?

Through social media, community engagement and ensuring the National Performance Framework is a key factor in policy-development.

Scottish Government should consider whether setting up an external advisory and scrutiny body emulating the work of the Sustainable Development Committee would help track Scotland's progress towards the UN SDGs.

It would be helpful to map out which Scottish Government policies deliver towards the UN SDGs and how. Work around the draft Environment Strategy partly seeks to do that but this should be emulated by other Government departments especially directorates dealing with energy, transport, business, planning, agriculture and rural development.

It would be important to be able to measure Scotland's progress towards the UN SDGs.

It will be important to connect the work around the realisation of UN SDGs with Scotland's ambitious human rights agenda.

Who are you working with?

What are the key organisations working to deliver the SDGs you are involved with and what function do they provide?

When responding, please include detail on (where possible):

- **Name** of the organisation
- The organisation's **function**
- The **Sustainable Development Goal(s) it contributes to**
- **Who they work with** (e.g. social groups and/or partner organisations)

Scottish Environment LINK works with its members (<http://www.scotlink.org/about/link-member-organisations/>) as well as wider Scottish civil society organisations and policy-makers.

In what ways could Scotland improve its SDG delivery internationally and what would this involve (e.g. possible partnerships, policy, resources, practices)?

By supporting the work of European partners (e.g. SDG Watch Europe: <https://www.sdgwatcheurope.org/>) as well as participating in international meetings to showcase the work happening in Scotland.

3. How is Scotland doing in relation to each SDG?



This section asks you to focus on Scotland’s performance and delivery of each of the 17 UN SDGs and their related targets.

There will be one page for each of the SDGs with the same question prompts on each.

Please draw on both your own experience and evidence you are aware of, and the evidence contained in the [discussion paper published alongside this survey](#).

You can respond to as many or as few SDG sections as you like.

You can use the index of SDGs below to jump to ones you are interested in responding on.

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GOAL 1: No Poverty



We would encourage you to **consider your response in light of the SDG targets** for this indicator - see [End poverty in all its forms everywhere](#) - and also the **initial assessment of Scotland's performance in the [discussion paper published alongside this call for evidence](#).**

Please tell us how well you think Scotland is progressing towards achieving this goal and related targets: What is your view of the evidence we have on this Goal, and what does your experience tell us about progress on this Goal?

What do you think are the significant programmes, actions, strategies, and policies currently in place to help deliver this Goal in Scotland (of any scale) and what have they achieved?

When responding, please include detail on (where possible):

- **Name** of the programme, policy or action
- **Partners** involved in it
- **SDG target(s)** it contributes to
- **Links with other Sustainable Development Goals** that it also contributes to
- **Outcomes** and evidence on what is being achieved as a result

What do you think are the key issues, challenges and opportunities we have in achieving this Goal and the related UN targets and what evidence is there to support your view?

What actions or next steps do you think Scotland should take in response to the key issues, challenges and opportunities you have highlighted?

When responding, please include detail on (where possible):

- **What action** you think is needed
- The **timeframe for the action** (e.g. immediate, medium or longer term)
- What possible **barriers exist** to taking effective action
- What will **help this action happen**

What, if anything, should Scotland stop doing to improve delivery of this Goal? (For example, this could include specific approaches, policies, projects, funding streams, attitudes)

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GOAL 2: Zero Hunger



We would encourage you to **consider your response in light of the SDG targets** for this indicator – see [Zero Hunger](#) - and also the **initial assessment of Scotland’s performance in the [discussion paper](#)** published alongside this call for evidence.

Please tell us how well you think Scotland is progressing towards achieving this goal and related targets: What is your view of the evidence we have on this Goal, and what does your experience tell us about progress on this Goal?

What do you think are the significant programmes, actions, strategies, and policies currently in place to help deliver this Goal in Scotland (of any scale) and what have they achieved?

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GOAL 3: Good Health and Well-being



We would encourage you to **consider your response in light of the SDG targets** for this indicator – see [Ensure healthy lives and promote well-being for all at all ages](#) – and also the **initial assessment of Scotland's performance in** [the discussion paper published alongside this call for evidence](#).

Please tell us how well you think Scotland is progressing towards achieving this goal and related targets: What is your view of the evidence we have on this Goal, and what does your experience tell us about progress on this Goal?

What do you think are the significant programmes, actions, strategies, and policies currently in place to help deliver this Goal in Scotland (of any scale) and what have they achieved?

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GOAL 4: Quality Education



We would encourage you to **consider your response in light of the SDG targets** for this indicator – see [Quality Education](#) – and also the **initial assessment of Scotland’s performance in** [the discussion paper published alongside this call for evidence](#).

Please tell us how well you think Scotland is progressing towards achieving this goal and related targets: What is your view of the evidence we have on this Goal, and what does your experience tell us about progress on this Goal?

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GOAL 5: Gender Equality



We would encourage you to **consider your response in light of the SDG targets** for this indicator – see [Achieve gender equality and empower all women and girls](#) – and also the **initial assessment of Scotland's performance** in the [discussion paper published alongside this call for evidence](#).

Please tell us how well you think Scotland is progressing towards achieving this goal and related targets: What is your view of the evidence we have on this Goal, and what does your experience tell us about progress on this Goal?

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GOAL 6: Clean Water and Sanitation



We would encourage you to **consider your response in light of the SDG targets** for this indicator – Ensure access to water and sanitation for all – and also the **initial assessment of Scotland's performance in** the discussion paper published alongside this call for evidence.

Please tell us how well you think Scotland is progressing towards achieving this goal and related targets: What is your view of the evidence we have on this Goal, and what does your experience tell us about progress on this Goal?

What do you think are the significant programmes, actions, strategies, and policies currently in place to help deliver this Goal in Scotland (of any scale) and what have they achieved?

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What, if anything, should Scotland stop doing to improve delivery of this Goal? (For example, this could include specific approaches, policies, projects, funding streams, attitudes)

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GOAL 7: Affordable and Clean Energy



We would encourage you to **consider your response in light of the SDG targets** for this indicator – see Ensure access to affordable, reliable, sustainable and modern energy – and also the **initial assessment of Scotland's performance in** the discussion paper published alongside this call for evidence.

Please tell us how well you think Scotland is progressing towards achieving this goal and related targets: What is your view of the evidence we have on this Goal, and what does your experience tell us about progress on this Goal?

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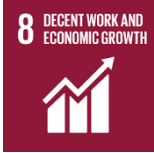
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GOAL 8: Decent Work and Economic Growth



We would encourage you to **consider your response in light of the SDG targets** for this indicator – Promote inclusive and sustainable economic growth, employment and decent work for all – and also the **initial assessment of Scotland’s performance in** the discussion paper published alongside this call for evidence.

Please tell us how well you think Scotland is progressing towards achieving this goal and related targets: What is your view of the evidence we have on this Goal, and what does your experience tell us about progress on this Goal?

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GOAL 9: Industry, Innovation and Infrastructure



We would encourage you to **consider your response in light of the SDG targets** for this indicator – Build resilient infrastructure, promote sustainable industrialization and foster innovation – and also the **initial assessment of Scotland's performance in** the discussion paper published alongside this call for evidence.

Please tell us how well you think Scotland is progressing towards achieving this goal and related targets: What is your view of the evidence we have on this Goal, and what does your experience tell us about progress on this Goal?

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GOAL 10: Reduced Inequality



We would encourage you to **consider your response in light of the SDG targets** for this indicator – Reduce inequality within and among countries – and also the **initial assessment of Scotland's performance in the discussion paper published alongside this call for evidence.**

Please tell us how well you think Scotland is progressing towards achieving this goal and related targets: What is your view of the evidence we have on this Goal, and what does your experience tell us about progress on this Goal?

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GOAL 11: Sustainable Cities and Communities



We would encourage you to **consider your response in light of the SDG targets** for this indicator – see [Make cities inclusive, safe, resilient and sustainable](#) – and also the **initial assessment of Scotland's performance in** [the discussion paper published alongside this call for evidence](#).

Please tell us how well you think Scotland is progressing towards achieving this goal and related targets: What is your view of the evidence we have on this Goal, and what does your experience tell us about progress on this Goal?

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GOAL 12: Responsible Consumption and Production



We would encourage you to **consider your response in light of the SDG targets** for this indicator – see [Ensure sustainable consumption and production patterns](#) – and also the **initial assessment of Scotland’s performance** in the [discussion paper published alongside this call for evidence](#).

Please tell us how well you think Scotland is progressing towards achieving this goal and related targets: What is your view of the evidence we have on this Goal, and what does your experience tell us about progress on this Goal?

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GOAL 13: Climate Action



We would encourage you to **consider your response in light of the SDG targets** for this indicator – see [Take urgent action to combat climate change and its impacts](#) – and also the **initial assessment of Scotland's performance in** [the discussion paper published alongside this call for evidence](#).

Please tell us how well you think Scotland is progressing towards achieving this goal and related targets: What is your view of the evidence we have on this Goal, and what does your experience tell us about progress on this Goal?

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GOAL 14: Life Below Water



We would encourage you to **consider your response in light of the SDG targets** for this indicator – see [Conserve and sustainably use the oceans, seas and marine resources](#) – and also the **initial assessment of Scotland's performance in** [the discussion paper published alongside this call for evidence](#).

Please tell us how well you think Scotland is progressing towards achieving this goal and related targets: What is your view of the evidence we have on this Goal, and what does your experience tell us about progress on this Goal?

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GOAL 15: Life on Land



We would encourage you to **consider your response in light of the SDG targets** for this indicator – Sustainably manage forests, combat desertification, halt and reverse land degradation, halt biodiversity loss – and also the **initial assessment of Scotland’s performance in** the discussion paper published alongside this call for evidence.

Please tell us how well you think Scotland is progressing towards achieving this goal and related targets: What is your view of the evidence we have on this Goal, and what does your experience tell us about progress on this Goal?

Progress in achieving this goal would mean that biodiversity loss is halted and reversed in Scotland. Based on numerous evidence, it is clear that this Goal is not on track in Scotland. As detailed further below, Scotland is failing to meet global 2020 targets on biodiversity, and therefore the decade ahead, from 2020 to 2030 will be of crucial importance if we are to avoid [a sixth mass extinction](#). Globally, [species are becoming extinct at 1,000 to 10,000 times the normal rate](#).

With respect to Scotland specifically, according to the 2016 [State of Nature Report](#), Scotland’s current biodiversity health status suggests that “ecosystems may have fallen below the point at which they can reliably meet society’s needs”. The same report highlights that one in eleven Scottish species is at risk of extinction, under pressure from human activities and climate change.

For example:

- According to the State of Nature Report, “internationally important numbers of seabirds breed in Scotland, providing an important proxy for the state of the marine environment. Since annual monitoring began in 1986 the Seabird Indicator has declined by 38%”. This is particularly concerning not least because Scotland is home to 1/3 of the EU’s breeding seabirds.
- Peatlands are a key part of the Scottish landscape and an internationally important habitat and a hugely important carbon store. Scotland’s peat soils cover more than 20 % of the country and store around 1600 million tonnes of carbon. However, [it is estimated that over 80 % of our peatlands are degraded](#).
- The 2014 Native Woodland Survey of Scotland demonstrated that 14% of irreplaceable Ancient Woodland habitats had been lost to Scotland since the 1980s.
- The way we support farmers and land managers does not help meet environmental outcomes. For example, key species of farmland birds are in decline while overall botanical diversity throughout the countryside declined by 10% and the abundance of bird and butterfly food plants declined by 8% between 1998 and 2007 (Countryside Survey, 2007). Soil health is another concern.

According to Scottish Natural Heritage, [Scotland’s progress](#) towards the [global 2020 Aichi targets](#) indicates that out of the 20 targets that Scotland is committed to meeting in less than two years, only 7 are on track. For 12 targets progress is insufficient and “unless we increase our efforts the target[s] will not be met by [the] deadline”. The remaining critical target that tracks financial resources available, which are key to delivering many of the other targets, is falling, meaning that we are moving away from the target. The report highlights that “total funding figures for most of the Scottish organisations that have some biodiversity remit have also declined in the last 5 years”.

Scotland’s biodiversity health is being further threatened by climate change pressures, that will exacerbate the damage as Scotland’s climate continues to change. According to a recently [published report “Scotland’s Nature on Red Alert: climate change impacts on biodiversity”](#), evidence suggests that Scotland’s biodiversity is already experiencing a changed climate, affecting species abundance, distribution, their food sources, breeding and ability to adapt. Some of Scotland’s most well-known and iconic wildlife, including Atlantic salmon, the capercaillie, the freshwater pearl mussel and the kittiwake, are under threat from climate pressures. Not enough

is being done in terms of setting climate targets which give due consideration to biodiversity loss. Just as important, action on climate change has failed to harness the positive impact that healthy ecosystems can have in tackling climate change. More specifically, healthy natural ecosystems can sequester more carbon and are more resilient to climate change impacts. In Scotland we are already experiencing a warming of one degree Celsius, so this is even more important. However, action that would deliver on a healthier natural environment is under-utilised at the moment.

Key failings have been identified with respect to:

- The absence of coherent and overriding framework for environmental protections, legally binding targets, long-term action and funding
- Failing policy coherence, for example in terms of ensuring that policy goals are consistent and approaches mutually reinforcing
- Lack of implementation of the Scottish biodiversity duty which applies to all Scottish Ministers and public bodies
- Decreased funding for public bodies and organisations delivering on biodiversity
- Meaningful stakeholder engagement particularly in the context of
- The risks of Brexit, particularly in terms of the role of EU environmental principles for future policy-making in Scotland as well concerns regarding the emerging governance gap in terms of functions currently performed by the European Commission and European Court of Justice

The current state of biodiversity health of Scotland, and the shortfall in fulfilling statutory biodiversity commitments indicate that not enough is being done to halt biodiversity decline. LINK members support the introduction of a Scottish Environment Act to address some of these failings.

What do you think are the significant programmes, actions, strategies, and policies currently in place to help deliver this Goal in Scotland (of any scale) and what have they achieved?

When responding, please include detail on (where possible):

- **Name** of the programme, policy or action
- **Partners** involved in it
- **SDG target(s)** it contributes to
- **Links with other Sustainable Development Goals** that it also contributes to
- **Outcomes** and evidence on what is being achieved as a result

The Scottish Government has introduced a number of pieces of legislation, domestic or deriving from the EU, as well as additional strategies to tackle biodiversity loss.

1. Climate Change (Scotland) Act 2009

The [2009 Act](#) introduced ambitious greenhouse gas reduction targets for 2050 as well as a Climate Change Plan to ensure ambitions are underpinned by action. Scotland has been able to meet its 2020 target of 42% reduction in GHGs six years early.

This has been largely due to the decarbonisation of sectors such as electricity generation. The [UK Climate Change Committee](#) report on Scotland states that:

- Good progress in the power sector is masking a lack of action in other areas, particularly in agriculture.
- There were no significant emission reductions in most sectors outside electricity generation and waste over the five years to 2016.
- Progress needs to be extended to a range of other sectors in order to meet Scotland's ambitious climate targets.
- In the agriculture sector, there is currently no regulatory approach in place and the Scottish Government is relying on voluntary measures alone to reduce emissions.

- Targets for tree planting and peatland restoration targets have been consistently missed, yet ambitions remain higher than ever.

Agriculture and related land use is responsible for around [a quarter of GHG emissions in Scotland](#) (26.1% in 2016 according to Government statistics). As such, action to ensure that land use practices are consistent with climate ambitions is critically important. What is more, land use practices can have a devastating effect on biodiversity if not managed appropriately.

This is why ENGOs welcomed the introduction of a Scottish Land Use Strategy (LUS) in the 2009 Act. Unfortunately, important provisions in the LUS have not been realised as detailed further below.

What is more, in 2018, the Scottish Government introduced a new Bill (the Climate Change (Emissions Reductions Targets) (Scotland) Bill) which aims to align Scottish climate ambitions with the Paris Agreement. ENGOs believe that the Bill does not do that as it does not legislate for a net zero target by 2050 which is required if we are to meet ambitions for not exceeding a 1.5 °C temperature increase as stated in the Paris Agreement.

In addition, the new Bill does not address the important contribution of nature-based solutions for combatting climate change. This is particularly important as Scotland's nature has the potential to capture much more carbon if it is healthy and resilient.

It is for this reason that Scottish Environment LINK is asking that the new Bill introduces measures to enhance Scotland's carbon-rich natural environment, including peatlands, native woodlands and intertidal habitats need to be protected, restored, enhanced and expanded to achieve the huge potential for negative emissions, up to 90–100% of its annual CO2 emissions according to a recent [study](#).

More information can be found here: <http://www.scotlink.org/wp/files/documents/Scottish-Environment-LINK-ECCLR-Stage-1-Evidence-Climate-Bill-Aug2018.pdf>.

2. Land Use Strategy:

The 2009 Climate Act introduced a requirement for a Land Use Strategy which was consulted on and a second iteration of it published in 2016 outlining plans and policies for up to 2021. However, the [Land Use Strategy](#) has failed to deliver in a number of important ways which have hampered its ability to ensure land use policies are coherence and deliver on its vision for sustainable land use. More specifically, below is an overview of actions included in the Strategy which have not yet progressed:

- Develop and publish a more detailed reporting framework by December 2016: There is no new reporting framework and Scottish Government have confirmed lack of progress in response to a [Parliamentary Question](#).
- Scope the development of an online mapping tool to commence in 2017.
- Set up an expert group to assist with developing guidance in relation to regional partnerships, to report findings by end 2017: Expert group has never been convened.
- Reconvene expert group and ask them to look at regional framework development, to report end 2018. Delayed due to lack of progress on previous point.
- Prepare a proposal for an urban land use pilot by mid-2017: No progress on this.
- Scope potential to develop an Upland Vision: SNH reported findings and recommendations in December 2016 but Ministers have still not made a decision on it.

It is interesting to note that while the relationship between the Land Use Strategy and the planning system was meant to be informed by the outcome of the on-going review of the Scottish planning system, these are not mentioned in the Planning Bill, as proposed by Scottish Government.

ENGOs want to see progress on the regional partnerships and frameworks promised under the Strategy as we see these as a mechanism through which to prioritise and coordinate delivery of various land use priorities and to help target whatever form of public subsidy replaces the Common Agricultural Policy, if and when Brexit happens.

3. 2020 Biodiversity Route Map:

The [Route Map](#) identifies large scale collaborative Priority Projects across Scotland which are key to the delivery of the strategy and the 2020 Aichi targets. It is important to note that all actions are project based and therefore do not provide long-term targets or policy direction or funding.

Some progress has been achieved and many projects have been successfully completed. Nevertheless, there is more work to be done as many targets are not on track. Specifically, work around the restoration of native woodland, ecological connectivity and sustainable land management. This is unsurprising given evidence provided in other parts of this submission, however, it is very concerning that the same issues arise in different policies and there is not real action to deliver change on the ground.

What is more, it is recognised that “whilst overall progress with delivery of the Route Map is good, this, on its own is not enough to meet the Scottish Government ambitions set out the [Scottish Biodiversity Strategy](#)” which aims to:

- protect and restore biodiversity on land and in our seas, and to support healthy ecosystems
- connect people with the natural world, for their health and well-being, and to involve them more in decision making
- maximise the benefits for Scotland of a diverse natural environment and the services it provides, contributing to sustainable economic growth.

Given the concerning evidence about the state of Scotland’s biodiversity, it is more urgent than ever before to review existing policies, set legally binding targets for future ambition and support action via secure funding streams.

4. Statutory biodiversity duty:

Under Scottish law, specifically the Nature Conservation (Scotland) Act 2004 and the Wildlife and Natural Environment Act 2011, office-holders and public bodies have a duty to ‘further the conservation of biodiversity when carrying out their functions’ and publicly report on those activities. This biodiversity duty was introduced as a means to helping Scotland meet its international obligations under the Rio Convention as well as accelerate efforts to mainstream biodiversity considerations.

However, in reality most public bodies do not seem to be taking appropriate action to ensure that they are observing their biodiversity duty. An evaluation study in 2015 revealed that of the 139 public bodies believed to have been in existence during the reporting period, only 61 (44%) produced a biodiversity duty report, 35 (25%) did not publish a report and 43 (31%) may have produced a report but they did not respond to the survey and no report was available online.

This prompted the Scottish Parliament’s Public Audit and Post-Legislative Scrutiny Committee to look into the lack of implementation and enforcement of the biodiversity duty. The Committee produced a [report](#) in which it recommended that the Government introduces further guidance and reminders to ensure enforcement is improved. Members of Scottish Environment LINK continue to support that [further action is needed](#) for office-holders and public bodies to meet their biodiversity duty.

The reality is that in the absence of a legally enforceable duty with clear guidance and prioritisation of actions, there will be little progress towards meeting the existing biodiversity duty. This is particularly concerning given ongoing evidence of sharp biodiversity decline as well as the Government proposals for an even more limited duty to replicated existing EU protections, as suggested in the ongoing Environmental Principles and Governance Consultation.

5. Protected areas network

In Scotland, international, EU and domestic legislation provides for a network of protected areas. Protected areas are critical for tackling biodiversity loss and this is supported by robust evidence. While the wider socio-economic benefits of these areas must be better recognised and valued, the primary purpose of protected areas is, and must continue to be, conservation of species and habitats.

The Scottish Government must take action to complete the existing network of SPA, SAC, SSSI and Ramsar sites, and bring Scotland’s protected areas into favourable condition. The Scottish Government must set a target to bring 100% of designated features with an on-site remedy into favourable condition by 2025. A review of the necessary actions and barriers to deliver must be carried out, including analysis of the external pressures for features assessed as having ‘no on-site remedy’.

It is important that the Government ensures that its approach to protected areas meets its stated objective to 'maintain and enhance our environment'.

Within the progress report for Aichi Targets, Scottish Government and SNH showcase protected areas as a success, where 80% of features in 2016 were reported as in favourable condition. The Aichi Target for protected areas (C11) was recently reported as having been exceeded. LINK have in the past have raised concerns on how this data is being reported. A significant proportion of 'unfavourable' features have been designated as 'unfavourable recovering due to management'. This has led to the 'unfavourable' features being categorised as favourable under the national performance indicator, and no evidence has been forthcoming on whether there has been delivery of management measures on the sites.

Critically, insofar as EU protected sites are concerned (Natura sites comprising of SPAs and SACs), there is an additional concern with respect to the loss of important governance mechanisms that ensured legislation was enforced and dedicated funding streams (i.e. the EU LIFE programme) which supported action on the ground.

6. Invasive Non-Native Species

Invasive Non-Native Species (INNS), which are one of the most important drivers of biodiversity loss in Scotland, and the actions needed to tackle the spread of INNS are barely mentioned. Scotland's Biodiversity Route Map frames INNS as a key pressure; science indicates that overall the pressure is intensifying.

The official statistics report on protected areas condition states that invasive species constitute '[the single biggest negative impact on feature condition](#)' in Scotland; island ecosystems are particularly vulnerable to INNS impacts, and Scotland's islands host disproportionately important biodiversity.

However, in terms of INNS action it is noteworthy that a new national Rhododendron strategy for Scotland is still not forthcoming.

7. Agriculture and rural development funding scheme

Scottish Environment LINK members want to see thriving rural communities and landscapes. Members have long-argued about the need to ensure that policies for agriculture and land management contribute towards our shared environmental ambitions that work for both people and planet. The current subsidy system under the Common Agricultural Policy (CAP) does not achieve that. We note, however, that in the context of the ongoing EU CAP review, the European Parliament is advocating for CAP mechanisms to work for the environment. This is positive news. Should Brexit come to pass, Scotland will have to develop a new system of supporting farmers and other land managers. LINK members support the need for retaining funds to do that, however, we need to reshape how funds are distributed in order to ensure that our rural communities can thrive.

LINK members believe that a future farming and land management support scheme should be based on the principle of 'public money for public goods'. This is consistent with the ambitions of the Land Use Strategy.

In a [survey](#) conducted on behalf of LINK, 75% of Scots said that they want farming to deliver for our environment and climate. Scottish Government needs to work with stakeholders from across the board to develop new policies that meet this public ask.

LINK views are further elaborated here: http://www.scotlink.org/wp/files/LINK-Future-of-Farming-and-Rural-Land-Management_March2017.pdf.

8. Forestry Strategy

The 2018 Forestry and Land Management Act gives Scottish Ministers (and also all Scottish public authorities) a duty to promote sustainable forestry management (SFM). The new [Forestry Strategy 2019-2029](#) defines SFM as per the 1993 Helsinki Ministerial Conference on the Protection of Forests and hope to promote SFM through use of the UK Forestry Standard as a benchmark of good forestry.

The 2014 Native Woodland Survey of Scotland shows that 54% of Scotland's native woods fail on at least one of the four condition indicators. This is not directly addressed in the Forestry Strategy beyond the generic "supporting and enabling management of forests to increase their positive impacts on air, water, soils and biodiversity."

9. Convention on Biological Diversity and 2020 Aichi Targets:

The UK is a signatory to the Convention on Biological Diversity and in line with Scotland's devolved settlement, implementation of the provisions of international agreements for the environment is a matter for the Scottish Government and Parliament.

As mentioned earlier, the Scottish Biodiversity Route Map to 2020 was introduced in response to the Aichi targets. As also mentioned above, a review of progress towards the 2020 Aichi targets reveals that Scotland is not on track to meet these targets. For example, Scotland is not on track to meet its international obligations to halt biodiversity loss, for example in terms of habitat loss, control of invasive species and prevention of extinction of species.

What is more, there has been very little engagement ahead of the Conference of the Parties of the Convention scheduled in end of 2020. At this point, leaders from across the world will deliberate on a New Deal for Nature. As the timeframe for the UN SDGs is till 2030, the decade ahead is of critical importance. Robust measures must be adopted globally if we are to reverse the loss of biodiversity.

In this context, it is very worrying that Scottish Government has not provided a forward plan for engagement with stakeholders and indeed has not indicated its priorities for developing a post-2020 strategy.

At the global level, countries are coalescing around the twin track approach of well management protected areas and habitat connectivity. With the right level of ambition and action from now till 2020, Scotland could be demonstrating how this can be achieved to the rest of the world. This is because the Scottish 2020 Route Map includes a commitment to a National Ecological Network which speaks directly to issues around habitat connectivity. Regional Land Use Plans, mandated under the Land Use Strategy, could be the means through which this programme of action is realised. This should be in addition to maintaining and enhancing Scotland's commitment to securing the future of protected areas, including actin to complete the existing network of SPA, SAC, SSSI and Ramsar sites, and bring Scotland's protected areas into favourable condition.

10. Scottish Environment Strategy

The Scottish Government consulted on a draft Environment Strategy. Members of Scottish Environment LINK welcomed this and support the need to "develop a strategic approach on environmental policy to protect and enhance our environment, safeguard natural capital and continue Scotland's leading role in addressing environmental challenges".

However, a strategy is only effective if it contains clear review and implementation frameworks and it is itself action-oriented. Experience has shown that when such requirements are not in place or they are not legally binding, implementation lags and results are poor. We are therefore disappointed that the Discussion Paper does not provide any insight on those critical aspects.

- LINK members consider that an effective Environment Strategy needs to:
- Define future goals and aspirations, including measurable targets and indicators for achieving them;
- Provide a science-based overview of the state of Scotland's environment, including past and current trends;
- Identify priority actions and provide timeframe for delivery of set actions;
- Set out a clear governance framework for the delivery of actions, including regular review of actions and the Strategy itself; and
- Identify clear funding streams for taking forward those actions.

We look forward to working with Government to develop a revised draft Environment Strategy over the coming months and note that initially the Strategy was expected by end of 2018 but has been since delayed.

What do you think are the key issues, challenges and opportunities we have in achieving this Goal and the related UN targets and what evidence is there to support your view?

The sections above have detailed a number of key issues and challenges when it comes to implementation of legislation and the need for greater ambition. In addition to that the following should also be highlighted:

- **Policy coherence in relation to sustainable consumption and production:** The Scottish Government has not included “sustainable development” as the overarching purpose of the National Performance Framework, where evidence through Aichi target 4 Sustainable consumption and production suggests that: “we still have work to do to ensure the economy is operating within safe ecological limits”. LINK members have raised this concern on several platforms, that given Scotland’s commitment to meet the UN Sustainable Development Goals, it is unclear why there is resistance in including “sustainable development” in the National Performance Framework.
- **Incentives reformed:** Within the Aichi targets progress report it is indicated, that in activities which conflict with biodiversity, leading to its decline and at times loss incentives have been given. What remains unclear is how the Scottish Government aims to address such areas of concern, given issues will be magnified in the context of the UK’s exit from the EU and potential for CAP reform.
- **Biodiversity duty and obligations integrated and mainstreamed:** In 2018 scrutiny of biodiversity reporting duties of public sector organisations by Public Audit and Post-Legislative Scrutiny Committee indicated that considerable action was needed to fully imbed biodiversity in terms of implementation and reporting of duties.
- **Monitoring and reporting on data accurately and transparently:** as mentioned earlier there are concerns about the way in which some data about protected areas are monitored and reported on. What is more, there is ongoing work from environmental charities to ensure that environmental and biodiversity data reporting is maintained and improved. LINK members and partners have conducted a [Review of the Biological Recording Infrastructure in Scotland](#) and provide costed recommendations for the collection, management and use of wildlife data to improve our knowledge of biodiversity
- **Governance mechanisms:** as indicated earlier, LINK members remain concerned about the prospect of Brexit and implications for environmental governance. The Scottish Government set up an independent expert group to deliberate on [governance risks for Scotland’s environment](#). The expert group concluded that there is a governance gap in Scotland due to the loss of functions currently performed by EU agencies, the European Commission and European Court of Justice. However, the Scottish Government has not yet put forward proposals for addressing this. As such, LINK members remain concerned about the loss of these important enforcement mechanisms which have been pivotal in ensuring EU environmental legislation delivers for the environment.
- **Meaningful stakeholder engagement:** as mentioned earlier, there is no confirmed process for engaging on the development of future Scottish Government policy for biodiversity post-2020. What is more, previous governance structures which ensured ENGO voices participated in regular discussions with senior civil servants, ministers and agencies are no longer open to external stakeholders.
- **Funding:** there are several challenges to obtaining the funding for environmental projects, as noted earlier on. There are new funding arrangements between statutory agencies such as SNH and partners delivering on policy outcomes, e.g. biodiversity. For example, longer term funding arrangements available to some organisations have been replaced by yearly arrangements; this timeframe does not reflect the timescales of ecological change or action. What is more some funds are moving away from conservation and biodiversity restoration, to other goals such as engaging with youth and disadvantaged communities, which are important but come at a cost of conservation goals. Spend on Scottish Natural Heritage (SNH) management agreements declined by 49% over in recent years^{Error! Bookmark not defined.} What is more there is uncertainty regarding dedicated EU environmental funds which have been of great importance to Scotland, bringing in over £25m for delivery of conservation.
- **Uncertainty on how biodiversity strategy beyond 2020 aligns with SDG 15:** While the Aichi progress report tracks the performance of 2020 targets, there is no clarity on further actions that Scottish Government or SNH will undertake to ensure that Scotland’s progress improves ahead of 2020¹. The UN SDG’s are till 2030, in terms of SDG target 15, there is currently no discussion on any strategy’s or actions post 2020, that review biodiversity concerns, in the wider policy context, and amid growing funding pressures.

¹ For more details see LINK’s previous submission to ECCLR on progress towards the Aichi targets: <http://www.scotlink.org/wp/files/documents/SEL-evidence-to-ECCLR-on-Biodiversity-interim-report-and-Aichi-Targets.pdf>

In terms of opportunities, action to tackle the challenges outlined above would be a way of realising and practically demonstrating Scotland's support for what is now recognised as the right to a healthy environment, as supported by the First Minister's Advisory Group on Human Rights Leadership.

What actions or next steps do you think Scotland should take in response to the key issues, challenges and opportunities you have highlighted?

When responding, please include detail on (where possible):

- **What action** you think is needed
- The **timeframe for the action** (e.g. immediate, medium or longer term)
- What possible **barriers exist** to taking effective action
- What will **help this action happen**

There are a number of actions that Scotland should consider taking forward, including:

- 1) Introduce a Scottish Environment Act that:
 - a. embeds EU and international environmental principles in Scots law so that they can underpin all environmental decision-making.
 - b. creates an independent and well-resourced watchdog to enforce environmental protections in the same way that the European Commission and Court of Justice do today.
 - c. sets clear and ambitious targets for environmental protection alongside adequate financial resources.
- 2) Ensure there is a robust programme of action to address biodiversity concerns post-2020 based on a complete and well-managed network of protected areas and the roll-out of a National Ecological Network in line with Scotland's Biodiversity 2020 Route Map to 2020 commitments.
- 3) Reform agriculture and rural development subsidies to reflect a 'public money for public goods approach':
 - LINK members recommend a system where, public money is used to deliver public goods. Farmers and land managers would be supported by enhanced advisory services, could opt in to different programmes rewarding them for the delivery of public goods, such as environmental goods (e.g. actions to enhance biodiversity, support climate action) and benefit from opportunities to modernise their business as well as work collectively. According to a study jointly commissioned by the RSPB, the National Trust and the Wildlife Trusts, the current levels of CAP funding could be effectively recalibrated to deliver towards environmental land management².
- 4) Amendments within the Climate Change Bill to ensure this adequately recognises the role and importance of nature-based solutions.
- 5) Fully implement the Land Use Strategy.

What, if anything, should Scotland stop doing to improve delivery of this Goal? (For example, this could include specific approaches, policies, projects, funding streams, attitudes)

Responses to the two previous questions apply here.

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² Assessing the costs of Environmental Land Management in the UK,

GOAL 16: Peace and Justice Strong Institutions



We would encourage you to **consider your response in light of the SDG targets** for this indicator – Promote just, peaceful and inclusive societies – and also the **initial assessment of Scotland's performance in** the discussion paper published alongside this call for evidence.

Please tell us how well you think Scotland is progressing towards achieving this goal and related targets: What is your view of the evidence we have on this Goal, and what does your experience tell us about progress on this Goal?

What do you think are the significant programmes, actions, strategies, and policies currently in place to help deliver this Goal in Scotland (of any scale) and what have they achieved?

When responding, please include detail on (where possible):

- **Name** of the programme, policy or action
- **Partners** involved in it
- **SDG target(s)** it contributes to
- **Links with other Sustainable Development Goals** that it also contributes to
- **Outcomes** and evidence on what is being achieved as a result

What do you think are the key issues, challenges and opportunities we have in achieving this Goal and the related UN targets and what evidence is there to support your view?

What actions or next steps do you think Scotland should take in response to the key issues, challenges and opportunities you have highlighted?

When responding, please include detail on (where possible):

- **What action** you think is needed
- The **timeframe for the action** (e.g. immediate, medium or longer term)
- What possible **barriers exist** to taking effective action
- What will **help this action happen**

What, if anything, should Scotland stop doing to improve delivery of this Goal? (For example, this could include specific approaches, policies, projects, funding streams, attitudes)

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GOAL 17: Partnerships to achieve the Goals



We would encourage you to **consider your response in light of the SDG targets** for this indicator – see [Revitalize the global partnership for sustainable development](#) – and also the **initial assessment of Scotland's performance in** [the discussion paper published alongside this call for evidence](#).

Please tell us how well you think Scotland is progressing towards achieving this goal and related targets: What is your view of the evidence we have on this Goal, and what does your experience tell us about progress on this Goal?

What do you think are the significant programmes, actions, strategies, and policies currently in place to help deliver this Goal in Scotland (of any scale) and what have they achieved?

When responding, please include detail on (where possible):

- **Name** of the programme, policy or action
- **Partners** involved in it
- **SDG target(s)** it contributes to
- **Links with other Sustainable Development Goals** that it also contributes to
- **Outcomes** and evidence on what is being achieved as a result

What do you think are the key issues, challenges and opportunities we have in achieving this Goal and the related UN targets and what evidence is there to support your view?

What actions or next steps do you think Scotland should take in response to the key issues, challenges and opportunities you have highlighted?

When responding, please include detail on (where possible):

- **What action** you think is needed
- The **timeframe for the action** (e.g. immediate, medium or longer term)
- What possible **barriers exist** to taking effective action
- What will **help this action happen**

What, if anything, should Scotland stop doing to improve delivery of this Goal? (For example, this could include specific approaches, policies, projects, funding streams, attitudes)

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4. Further examples and case studies

The links across the SDGs are often complex and our actions and policy decisions can create trade-offs and synergies across different goals.

Do you have any example to share that illustrate the links between the different SDGs?

The UK Government VNR is likely to include a number of case studies which highlight particular activities, policies, legislation or initiatives which are significant, insightful, innovative and effective.

If you have a case study you think would be appropriate for this, please provide a brief outline below (or provide a link to an online summary if one exists).

Consent for publication

Scotland's SDG network would like to publish responses to this exercise (excluding personal contact information you may have provided) on <https://globalgoals.scot/> upon completion.

Please indicate if you consent to publication of your response in full, in part (please specify) or not at all. If you have any questions regarding the handling of your data or publication of responses, please contact nationalperformance@gov.scot

- I consent to publication of my response IN FULL (excluding contact details)
- I consent to publication of my response IN PART (please specify below)
- I DO NOT CONSENT to publication of my response

If you would like only part of your response to be published (for example, for commercial confidentiality reasons), please specify which parts you DO and DO NOT wish to be published below.

Thank you

Please send your completed survey, along with any attachments, to nationalperformance@gov.scot

Your response will help to inform our overall approach to delivering the National Outcomes and SDGs in Scotland and our input into the UK Government VNR.

If you have any questions or concerns about this survey, please contact nationalperformance@gov.scot