



Scottish
Environment
LINK



Environmental Funders Network

Saving Scotland's Seas: Resourcing Ocean Recovery

Briefing paper following on from a joint event with Scottish Environment LINK and the Environmental Funders Network

"You can get great value for money out of Scottish marine conservation, so it's a good investment from a philanthropic point of view." - Hugh Raven, Environmental Funders Network

"41% of Scotland's population lives within 5km of the sea. So, if you're interested in people and communities in Scotland, then you have to be interested in the health and vitality of our coasts and waters." - Nick Addington, William Grant Foundation

Our joint event in December 2020 brought funders together to highlight the importance, and urgency, of investing in the Scottish marine environment.

- You can view a recording of the event here: <https://vimeo.com/491352138>
- The Scottish Environment LINK marine film is here: <https://www.scotlink.org/save-scottish-seas/>

Experienced marine funders from:

- **Esmée Fairbairn Foundation** (EFF) represented by Jenny Dadd, Funding Manager (Environment Lead)
- **John Ellerman Foundation** (JEF) represented by Dorothee Irving, Head of Grants
- **William Grant Foundation** (WGF) represented by Nick Addington, Chief Executive, and
- **The Craignish Trust** (TCT) represented by Caroline Younger, Trustee

helped to set the scene about what has already been achieved, and were then joined by sector experts and the event's Chair from:

- **Scottish Environment LINK** (LINK) represented by Deborah Long (Chief Officer) and Calum Duncan (Convenor of LINK's Marine Group and Head of Conservation Scotland at Marine Conservation Society), and
- **Environmental Funders Network** (EFN) represented by Hugh Raven (Chair) - N.B. Hugh wears many other hats, including Chair of JEF, the Open Seas Trust and the Highlands and Islands Environment Foundation

The ensuing discussion focussed on what lies ahead and where there are more opportunities for funders to make a real difference. Some of the key points made, and questions asked, during the recording have been expanded on in this briefing paper.

Q: What are the most pressing marine funding gaps/needs now?

LINK: With funding for marine work at a very low ebb, there are gaps in all areas:

The effect of the pandemic has had a big impact on members' unrestricted funding that would normally be generated from membership engagement and events. Also projects have been interrupted or postponed, with knock on effects on funding. Policy and advocacy capacity within our member bodies on marine is already low - not all of our members have that resource - thus, the dedicated capacity within LINK has always been needed to help coordination and ensure that all members can engage and contribute effectively. More of LINK's member bodies are relying on reserves due to the pandemic and expect to do so for the next year or two.

We need significant public investment from statutory agencies like the Joint Nature Conservation Council, Marine Scotland and NatureScot (formerly Scottish Natural Heritage) both to have capacity for marine research and for monitoring and enforcement.

We need investment from industry so that industries that benefit from the 'public good' of Scotland's seas contribute a fair share to ocean recovery.

We also need project work, as several philanthropic funders are supporting, eg seagrass and native oysters. There is huge potential for funding practical projects and the return on investment for funders is very good. Scotland has 61% of the UK sea area, 60% of its coastline, 10% of Europe's coast, 25% of Europe's wind and wave power and 64% of UK fish landed by weight and value. Scotland's seas are globally important for many species and habitats. 2021 is a great opportunity to help contribute to ocean recovery in the NE Atlantic.

Funding is needed for joint public awareness raising. LINK aims to increase our advocacy work and our communications work. Getting people to talk to their Members of the Scottish Parliament (MSPs) really helps create the political space.

Q: It is often said that the most effective funding is towards policy and legislative change, but today we seem to be hearing about the need to fund practical measures on the ground. Indeed Scotland seems to have some great policies, but they are not being implemented in a timely way. Why is this and is funding one of the issues?

LINK: Scotland is a small country with multiple priorities. There is a tendency to tick things off after legislation is passed, so there is a gap between what happens on the ground and what is on paper. For example, the first tranche of fisheries management measures for Scotland's most vulnerable inshore Marine Protected Areas (MPAs) is held up as a good example of applying as near to a "whole-site" approach to management, with over 2,200km² of inshore sites off limits to trawling and dredging. However there is an issue of capacity to enforce compliance.

The scale of the coastline, particularly on the West, is very large. There have been a number of reported possible intrusions into MPAs, many of which cannot be pursued due to lack of evidence. It is vital that monitoring systems are on vessels to identify those not complying. The Scottish Government committed to rolling out Remote Electronic Monitoring on the whole scallop fleet in 2015, currently only larger vessels have Vessel Monitoring Systems (VMS), and this has been repeatedly delayed but is finally due in 2021.

Lack of funding is a key reason that Scotland (and other parts of the UK) have failed to achieve biodiversity targets, hence our sector's advocacy to find ways to increase that funding, including through more strategic use of current subsidies that can contribute counter productively, and for better alignment of government strategies from which spending decisions flow. This question becomes even more pertinent in light of UK exit from the EU and the Scottish Government being unable to access European Maritime and Fisheries Fund (EMFF) funding. This is to be superseded by the UK Prosperity Fund and it is crucial that resources follow need when this fund is allocated.

Q: What are the big opportunities for change now that funders could be considering?

LINK: We see the marine environment as a major component of Scotland's nature requiring recovery at scale.

Trusts and Foundations could consider supporting organisations that are working to make vital promised action happen, including capacity for alliance building, for research and education, for campaigning and communications, events.

In terms of marine policy, we have set out in our [Ocean Recovery Plan](#) what we believe needs to happen in Scotland. In summary there are four areas:

1. Legally binding targets in Scotland for ocean recovery.
2. Strengthen the Marine Protected Area network to contribute to the goal of 30% of our seas to be highly protected, at least a third of which to be fully protected, by 2030.
3. Fisheries reform, including new policies and where necessary new legislation to deliver climate and nature positive fishing.
4. Significant Investment in marine conservation and sustainability, from public funds and marine based industries.

We are at a point where all governments recognise they must act to address the interlinked climate and nature emergencies, and the Scottish Government has regularly and consistently linked them, although in a recent Parliamentary vote on a motion they did not formally recognise a nature "emergency". This is a necessary political commitment that LINK and its members are lobbying for.

We need the sort of target driven approach for nature as we have seen with carbon emission legislation. Targets help drive change. LINK is campaigning for this centrally, including for ocean recovery targets, and needs ongoing capacity to make sure we get them. Having a marine and ocean 'blue thread' throughout is essential.

The Marine Scotland Act 2010 is genuinely world class legislation that the LINK Save Scottish Seas campaign helped to secure, with the duty on ministers to protect and where appropriate enhance the health of the sea, a duty to establish a National Marine Plan and a duty to set up an ecologically-coherent network of Marine Protected Areas. On paper, in terms of scale and features covered, Scotland's MPA network is considered to be very good, ranging from the intertidal to the deep-sea and encompassing important sites for mobile species and habitats. However, gaps in representativity still exist (for example, no replication of sites for flapper skate, basking shark and Risso's dolphins, no marine bird SPAs in Orkney and no sites yet identified for heart cockle aggregations, burrowing anemones and spiny lobsters) and most of it, other than the first tranche of MPA measures, still does not have fisheries protection measures in place and urgently needs to be completed.

The MPA network also needs to be looked at anew in light of the nature and climate crises, for what it can deliver transformatively beyond protection and recovery of its features, to what it can do holistically in terms of supporting and enhancing ecosystem services, such as providing fish and shellfish nursery areas, protecting and enhancing blue carbon stores, protecting the coast from storms, providing opportunities for sustainable recreation, supporting health and wellbeing and more. Scotland's Climate Change plan, Climate Change (Emissions Reduction Targets)(Scotland) Act 2019, Future of Fisheries Management strategy and indeed written evidence from the Cabinet Secretary for Environment, Climate Change and Land Reform to the Scottish Parliament's ECCLR Committee on the IPBES Report recognise more work is needed on MPAs and the possible role of MPAs contributing to ecosystem services. LINK is calling for an independent MPA commission to look at how we can get the step change of achieving the IUCN target of 30% of our seas highly protected, a third of which - therefore 10% of our seas - *fully* protected, by 2030 (see [MPAs_English_4pp.pdf \(wdpa.s3.amazonaws.com\)](#) for definitions).

Scotland urgently needs modernisation of fisheries, particularly Remote Electronic Monitoring (REM) on all over 10m fishing vessels, and all high-risk (such as small scallop dredgers) under 10m vessels to know what is happening and to manage fishing activity better. We have that Scottish Government commitment though progress is delayed. Key parallel policy routes are the UK Fisheries Act 2020, which requires a Joint Fisheries Statement for all UK administrations, and Fisheries Management Plans requiring advocacy and collaboration across the UK. Scottish Government recently published its Future Fisheries Management (FFM) Strategy committing to an ecosystem-based approach to fisheries management, taking on board many of the recommendations LINK made in a detailed 23-page response to the FFM discussion paper.

Work to roll out Regional Marine Plans arising from the Marine (Scotland) Act 2010 is also delayed, but provides important opportunities for local community engagement. We need change at national and local scale for communities to be better able to engage with fisheries management and planning.

UK level eNGO cooperation is going on for COP15 in China this autumn which will be the basis for the next Biodiversity Action Plan. Scotland needs to show ambition. It's urgent and we need to pick up the pace.

Q: In terms of grant amounts, what is the median for grants being awarded in recent years? Have smaller grants proven just as effective in enacting the change needed in the marine space as those awarded to larger projects?

EFN: In 2013-2016, the median grant size in Scotland for all environmental work was a surprisingly tiny £8,870. That doesn't include Lottery grants - though when you add in Lottery, it only goes up to £9,900. The mean, on the other hand, is £60,520. Source: EFN's dataset from *Where the Green Grants Went Scotland*. While size of grants is obviously important, we tend to argue that how funds are deployed is also very significant in terms of the results they can achieve. We'll never have enough grant funding to match the magnitude of funding going into environmental degradation, so the key is for philanthropic funding to be catalytic. Like acupuncture needles -- tiny in relation to the body, but put in the right place, they can have a transformative effect. That's related not just to what is funded but how the money is used -- is it unrestricted? Is it long-term and patient, and thus affording the recipient some space to pursue long-term strategies? An [nfpSynergy survey of NGOs](#) some years ago, commissioned by the John Ellerman Foundation, found that that NGOs would be willing to forfeit (on average) 28% of the value of a grant if it meant the money was unrestricted.

JEF: Looking at 9 grants Ellerman has made to marine-related work in Scotland in the last 7 years, we've spent a total of £818k. The average grant equates to £90-100k over 3 years, so not really any small grants, which makes sense given we are interested in longer-term, systemic change.

TCT: We give around £100k a year away (around half of that for marine work) in grants of between £2k and £10k, either one-off or in three-year tranches.

Q: It appears that the Scottish Government is not very ambitious in conserving inshore waters (especially outside of MPAs), and is too closely aligned with the destructive fishing industry. What is LINK doing to campaign on this?

LINK: Before the EU referendum vote, the Scottish Government put in place progressive fisheries management measures in the most vulnerable inshore MPAs and Special Areas of Conservation, protecting over 2,200km² of inshore waters from damaging bottom trawling and scallop dredging (in direct response to the successful LINK #donttaketheP campaign). These are recognised as amongst the best examples of a "whole site approach" to MPA protection in the UK.

There was also a commitment to an Inshore Fisheries Strategy, Inshore Fisheries Bill and roll-out of vessel monitoring on smaller scallop dredgers. The Scottish Government had also made most progress within the EU in developing fisheries management measures for offshore MPAs and SACs. Emergency MPA protection

was also rapidly given to Loch Carron following scallop dredge damage to what transpired to be the largest flameshell bed in the world in the outer loch, made permanent in 2019, and the incident triggered a work package to improve protection of Priority Marine Features (PMFs) outside the MPA network.

Much of this progress has been delayed post EU referendum and post Covid, as government capacity has been diverted to the Covid response. We are still awaiting fisheries protection measures for the remaining inshore MPAs, for the offshore MPAs and the work package to improve protection of PMFs beyond the MPA network. Much of the intent is good, but pace has slowed and the key will be building the pressure to accelerate the pace and help flip the narrative so that good conservation measures are seen as essential for wider socio-economic good as part of a green and blue recovery and building back better after the pandemic.

LINK and members successfully advocated that there should be a modern fisheries strategy for Scotland, leading to the recently published Future of Fisheries Management strategy that includes a commitment to deliver ecosystem-based fisheries management, and we will be pushing for this, including a presumption against trawling and dredging in a significant part of the inshore area, as the strategy rolls out.

LINK is also pushing for the transformative ocean recovery asks in our Ocean Recovery Plan to feature in party manifestos ahead of the next Holyrood elections.

Q: And how are you taking this campaigning outside of Scotland to push for a race to the top within the UK nations (particularly using post-Brexit policy)?

LINK: We have continued campaigning outside of Scotland ever since the Brexit vote, building on a strong legacy of four-country working to deliver the Westminster, Scotland and Northern Ireland Marine Acts and Environment Links UK responses to the UK Marine Strategy.

With around two-thirds of the UK fishery by weight and value operating in the Scottish marine area, our members have been a strong voice within the wider Greener UK coalition pushing for a four-country Fisheries Act 2020 with strong ecosystem objectives a requirement on the face of this Westminster Act. Whilst the parliamentary arithmetic in the House of Commons weakened the Bill after we successfully helped to get it strengthened in the House of Lords, there are still useful provisions in it. LINK members were key to help get the Scottish Government supportive of a requirement for Remote Electronic Monitoring on the face of the Bill, but again Parliamentary arithmetic meant that the REM amendment secured in the Lords was voted down. The UK Government could not blame the Scottish Government for blocking an amendment on REM, thanks to our work to encourage the Scottish Government to express support for the REM amendment.

LINK was instrumental in helping to secure a Future Fisheries Management strategy for Scotland published in December 2020 that commits to an ecosystem-based approach to fisheries management, recognises the importance of REM and recognises the role that MPAs can play in supporting wider ecosystem services. We will use the FFM strategy roll-out and Joint Fisheries Statement drafting process to push for nature and climate positive fisheries. LINK submitted a detailed 23-page response to the FFM discussion process in 2019 and featured in plenary at a major closing conference of the process at RZSS, Edinburgh Zoo in summer that year. See: [LINK's response to the Future of Fisheries Management national discussion - Scotlink](#)

Q: The film asked for "climate and nature positive fishing measures" and this is something Jenny suggested Esmée Fairbairn Foundation is hoping to fund. What do the panel think nature & climate friendly fishing looks like, and how do we incentivise it?

LINK: Recovery from the seabed up is key, particularly urgent is introducing a spatial approach to fisheries management, to have appropriate fishing techniques happening in the appropriate habitats that can

“take” the gear and at a level that is sustainable plus a commitment to managing fisheries within precautionary environmental limits as determined by the best available science.

There is no one magic bullet. Larger boats targeting pelagic species can sometimes fish more sustainably than smaller boats targeting shellfish on the seabed, and some smaller boats, such as small scallop dredgers, can also do proportionally more environmental damage where they can access previously inaccessible grounds with rock-hopping gear. Removing towed gear from biogenic reefs and blue carbon stores (such as coldwater corals, flameshell beds, horsemussel beds, maerl beds, kelp forests, seagrass beds, shellfish beds and reefs such as flameshells and horsemussels, fragile examples of burrowed mud habitat) is an absolute must, but mobile gear should also be removed from subsets of wider representative habitats such as mud, sand, gravel and mixed ground seabeds to enable at least 30% of all seabed habitat types to be protected and left undisturbed, other than by natural processes (waves and tides). It is also important not simply to think that mobile gear is unsustainable and static gear is sustainable, since there is a serious entanglement issue for cetaceans, particularly minke whale and humpback whale in Scotland, in the latter.

LINK’s Ocean Recovery Plan proposes new policies, and legislation where needed, to support a ‘just transition’ to sustainable fisheries, as Scotland has begun to do for other unsustainable industries.

Measures should include:

1. Binding targets to end overfishing and eliminate the bycatch and entanglement of non-target and protected species.
2. A requirement for fully documented fisheries delivered through Remote Electronic Monitoring (with cameras) to improve data collection and help to end illegal, unreported and unregulated fishing.
3. A mechanism to improve inshore fisheries governance and transition to a new spatial management regime, which includes a presumption against trawling and dredging in a significant part of Scotland’s inshore waters.
4. A new vessel licencing system that allocates fishing opportunities according to transparent and objective environmental, social and economic criteria to incentivise the most sustainable fishing practices.

There will also need to be a just transition to using low and zero carbon propulsion and lower impact fishing gears and much investment and innovation will be needed.

Q: We heard about the role of communities raising the importance of the marine environment and species in the minds of local politicians. Do we need to do more to engage/reach/connect communities who are more geographically distant from the coast within this?

EFF: The bulk of Scotland’s population lives in the Central Belt, and may feel disconnected. Having a sense of ownership is critical. The Esmee Fairbairn Foundation sees this, hence its relative focus on the North sea and the Irish sea. Capturing and sustaining the interest of children is important. They know what they are inheriting. There is a long way to go and plenty to be done.

LINK: Our members like the Marine Conservation Society work to engage urban and coastal communities, and have ways people can engage close to home and at the coast. MCS Beachwatch litter cleans and surveys, including corporate days out, are very effective ways of getting people to engage. LINK members have a wide reach to people interested in nature through their memberships, many of whom are citizen scientists, educators, young people, volunteers and activists.

LINK’s Species Champions campaign connects Members of the Scottish Parliament with endangered and iconic Scottish species in their constituencies. Twenty-three MSPs (of 106 participating) champion a marine species. It gives our members a way to connect with MSPs about nature, organise site visits, and engage

them further on the opportunities and threats faced by their species. We involve these MSPs into our wider advocacy work, such as the recent Fight for Scotland's Nature campaign, focussed on keeping our EU protections post Brexit. For example, Species Champions for basking sharks and flameshells have both respectively been very supportive of establishing the Sea of the Hebrides MPA for basking sharks and minke whales and the Loch Carron MPA for flameshells. We help to organise visits, involving, for example school children and young citizen activists, like the Ullapool Sea Savers, connecting politicians with developments on the ground.

Q: How do you balance funding local marine conservation measures with the need to address fundamental changes (like acidification of the sea due to climate change)?

JEF: As a responsive funder not something they would take a view on, at least not in a directive way. Listen to the arguments put to us by the NGOs who are the experts. As long as the case is made, will listen to that. Want to fund things holistically and fund organisations which recognise interconnectivity between social, env and economic, not just interested in one element.

LINK: This is a case where we want both. Take the example of plastics, which is a global issue. The trick is to match them both together. Follow the model of tackling global issues at local level.

EFF: A smorgasbord, not a case of either/or, needs a suite of interventions. The issue of acidification is very important, one application mentioned it, hard to understand it. We have to be positive, take people on a journey where they feel they can make change, empowerment of people, small changes connect back. We need a variety of mediums, some may appear more important than others. Some local orgs can comment on the lack of national policy and can challenge more vociferously than perhaps the larger national NGOs. When it comes to climate change, there is a lot to be learnt regarding the marine environment eg blue carbon. Don't make it difficult, arguments have been made in nature terms, needs to be in a climate context. Up to the marine sector too to think about expanding the offer in terms of the case being made. We all rely on the seas for air.

EFN: Data collected by beach cleans is very local, and it absolutely has a national importance because it is analysed. The voluntary sector provides that data to the government.

TCT: If it were not for the eyes and ears around the coast we would not have this evidence. General feeling we are not getting the results and there is not sufficient voice eg from the eco-tourism sector.

Q: As a UK-wide NGO, more and more we are playing the angles between the devolved administrations to encourage a race to the top. Does the EFN plan to focus more on UK countries individually to help instigate progress that should be UK-wide?

EFN: We have a distinct programme in Scotland as there are significant funding gaps and important opportunities, so any extra funding we can get to raise Scotland's game even higher would be fantastic. We haven't been explicitly focussed on advocacy to date, but on improving the effectiveness, and growing the overall amount, of environmental philanthropy. Our research at a UK level (Where the Green Grants Went series) allows us to highlight underfunded issues and compare across geographies globally.

Q: How are we to reflect the differences between the administrations better?

LINK: In our applications to funders, we aim to explain the situation in Scotland concisely, focussing on the international importance of the Scottish marine resource in the round, referring to the statistics on our proportion of sea and coastal area. We think it is important that funders understand this, and the importance of Scottish based policy advocacy and campaigning directed towards the Scottish Parliament with its largely devolved responsibilities, without prejudicing the case being made by our colleagues seeking funding in the rest of the UK. We work with our eNGO colleagues through the Greener UK Coalition and the Environment Links UK, where the various country approaches are discussed, intelligence shared and incorporated into advocacy strategies. It is important that we have the resources within each of

the Links to continue to do this effectively. There is a recognition and commitment within the UK networks of the importance and indeed the necessity of a four-country approach to delivering environmental, including marine conservation, gains across the UK.

The rhetoric between the different countries is interesting. In Wales the Future Generations Act is a strong framework and likewise there is good rhetoric in Scotland. Compared to England implementation is better, the government is more proactive on the environment and will back up its statements with funding that, in many instances, is not seen at Westminster.

Q: Has anyone mentioned Brexit? The change to a Common Law regime makes the Habitats Directive enforceable as never before, we believe. Is anyone doing anything about this in Scotland in the offshore MPAs?

LINK: The Marine Conservation Society has recently published a report "Marine unProtected Areas" that looks in detail at the issue of fishing in offshore MPAs. This report was developed using a four-country approach recognising the different political contexts in the different nations and is consistent with LINK's Ocean Recovery Plan for Scotland. Summary report here: [marine-unprotected-areas-summary-report.pdf \(mcsuk.org\)](#) Full report here: [marine-unprotected-areas.pdf \(mcsuk.org\)](#)

Q: We are at a time of huge change (obviously), including changes to our environmental legislation. In the coming years we may need to challenge how that legislation is being enacted. It's not a route we take lightly but, in principle, would funders be willing to support NGOs taking legal challenges in UK countries where necessary?

LINK: On the question of exercising legal right, LINK has established a new [Environmental Rights Centre for Scotland](#) to help communities and eNGOs exercise their rights. The Esmee Fairbairn Foundation is a core funder of the Centre. Additionally, through the Fight for Scotland's Nature campaign which ran from 2018 until completion of Scotland's EU Continuity Act (December 2020), LINK helped secure in law much of the environmental protections we formerly had under the EU in Scottish legislation. The Act embeds key EU environmental principles into Scots law and stipulates that Scottish ministers and policy makers must have regard to these when developing new policies or legislation. The Act included the creation of the new watchdog Environment Standards Scotland and provision of adequate resources for it, though this does not have the power to take action on individual complaints of environmental damage. A summary of what has been achieved and what remains to be done is [here](#)

EFN: Some of our member funders are willing to fund NGOs taking legal action eg The Scottish Wildlife Trust hired a QC who helped them defeat a proposal for a golf course at Coul Links (funding secured via EFN's Rapid Response Fund). It's often hard to find funders with a local enough interest to support a legal challenge that's quite site-specific; to secure funding from non-local funders will often require NGOs making a compelling case that the case will provide a precedent that will be useful elsewhere.

Q: In terms of research and technological innovation to address threats facing the seas, what are the main trends in funding projects that incorporate such technologies?

WGF: Tech innovation not something we have supported a great deal, other than remote operated vehicles for surveying inshore waters for community groups we support. We also support data information management, eg Hebridean Whale and Dolphin Trust (HWDT) to improve and develop its information management system on cetacean sightings to share that info more widely, and digital platforms that support that type of work and the Coastal Communities Network project working with disparate groups to integrate data they harvest to build a richer picture of what is happening.

EFN: Hebridean Whale and Dolphin Trust has done some pioneering work on noise -- eg Mull is believed to be the noisiest place in Scotland because of seal scarers on salmon farms. There are various really interesting funder-supported technological interventions to address illegal fishing, such as [this](#).

EFF: With research and tech, what should be down to philanthropic and what is responsibility of the state with its deeper pockets? Designation of the MPAs would have been hard without the work of the third sector which we funded. Tech is moving on in terms of satellite monitoring of boats which OS does very well. We've not tended to fund research however we can under our new strategy and will be very careful and very selective. On aquaculture, very little done in this area.

Further information

EFN:

www.greenfunders.org

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- Where the Green Grants Went Scotland
<https://www.greenfunders.org/where-the-green-grants-went-scotland/>
- Inspiring People: Marine Conservation in Scotland
<https://www.greenfunders.org/inspiring-people-marine-conservation-in-scotland-video-and-podcast/>
- Rapid Response Fund <https://www.greenfunders.org/efn-rapid-response-fund/>

LINK:

We are happy to answer specific queries, and to put funders in touch with a member organisation(s).

www.scotlink.org

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- Information on Species Champions
<https://www.scotlink.org/link-campaigns/species-champions/?party=all®ion=all&host=all&order=ASC>
- Ocean Recovery Plan and film <https://www.scotlink.org/save-scottish-seas/>