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Lorna Slater MSP
Minister for Green Skills, Circular Economy and Biodiversity
Scottish Government

Dear Ms Slater,

Thank you very much for your time on April 19th and for the discussions on marine issues. We discussed the following points:

Deer management

Effective deer management is necessary to achieve nature restoration and to fulfil the ambitions of the upcoming Biodiversity Strategy. Around 70% of Scotland's land area can be characterised as uplands. Much of this landscape has suffered over centuries from peat extraction, overgrazing, intensive grouse moor management, and unsustainable deer impacts. Deer and grouse moor management systems operate on a largely unregulated and voluntary basis in contrast to most other forms of natural resources management, and to systems of administration in other similar European countries.

Land use change has been identified as a crucial part of Scotland's response to the nature and climate emergency. Today, deer hinders the nature-based solution of peatland restoration and woodland expansion. This means that there is an urgent need for sustainable deer management in order to restore biodiversity and benefit from ecosystem services such as carbon capture and flood prevention, especially in the uplands.

We reiterated LINK's support for the recommendations of the independent Deer Working Group Report and emphasised the need for these recommendations to be implemented in full and with effective project management. We also highlighted that existing section 8 powers to compulsory reduce deer numbers have not been used and argued that NatureScot should be encouraged to do so, including to inform new effective deer powers to intervene and reduce numbers in the public interest as part of proposed modernisation of deer legislation. We also suggested that a ministerial statement outlining next steps on deer management would be a useful step forward. We welcomed your commitment to consider this and your expectation that some progress would be made by our next quarterly meeting.

Scottish Biodiversity Strategy

LINK warmly welcomes the commitment to a new Scottish Biodiversity Strategy and the indications given that the Scottish Government is determined to take an ambitious approach to nature restoration.

LINK members are acutely aware that the successful delivery of the Biodiversity Strategy will require a whole-government approach. A range of interventions and strategies – including the forestry strategy, land use



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strategy, Regional Land Use Partnerships, planning and nature networks – will all impact on ability to meet the government's ambitions. Like climate, nature must become a priority across government. We remain keen to work with you to ensure that nature is embedded as a priority across government.

We emphasised the importance of the Biodiversity Strategy containing specific and deliverable objectives, highlighting the overly broad ecosystem definitions used in stakeholder consultation as a concern. We welcomed your reassurance that the Strategy itself would take a more specific approach to ecosystem definition and this would be reflected in the first delivery plan.

Nature Networks

Greater strategic planning of where investment and action takes place on biodiversity remains a key objective for LINK members. A National Ecological Network was a commitment in the previous Scottish Biodiversity Strategy and a key action in NPF3. However, there has been no action on this to date due to the lack of delivery plan attached to this commitment.

Nature networks are the latest incarnation of the national ecological network, and we are looking to you to champion this approach within Government.

While the draft NPF4 makes reference to the role of nature networks, this is without a clear delivery mechanism and is not envisaged on a national basis. LINK members strongly believe this should be strengthened to establish an explicit requirement that all planning authorities should be given proper resources to present a map based nature network, highlighting the best place to deliver projects that would contribute towards the creation of a strategic national Nature Network.

We explained that while the NPF4 makes reference to nature networks it does not provide planning authorities with sufficient guidance as to what these should look like. You may be interested in LINK's [short film](#) outlining the potential of the nature network approach. There is also no requirement that planning authorities report against their progress on this key policy area. While planning should be a key tool to deliver a national nature network, NPF4 as drafted remains too weak to deliver this.

We also highlighted the potential for Regional Land Use Partnerships to deliver in this area. We see RLUPs as central to success in matching national ambition against regional and local opportunities. However, in our view, the Partnerships being currently piloted will not reach or demonstrate this potential without funding, links into land management, public support, and a clear political commitment to their success.

COP15

While there was insufficient time to discuss COP15, we stated that we would provide some information on our plans.

LINK, in partnership with RSPB, is hosting a series of four briefing events for MSPs ahead of COP15. The first briefing was held in parliament on 21st April, followed by three online briefings focused on a nature-positive economy (12 May), 30 by 30, and marine conservation. Each will be recorded and available to watch afterwards via LINK's Youtube channel [here](#). We are also releasing a short film and running a series of blogs, similar to our [COP26 blog series](#). LINK has also shared our concerns over the Scottish Government's exclusion from the United Kingdom's delegation to COP15 with our partner eNGO's who are in ongoing discussions with DEFRA.

Once again, thank you for your time. If you require further information on any of the issues we have raised, we would be delighted to supply that.



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Yours sincerely,

Deborah Long, Chief Officer, LINK

Duncan Orr-Ewing, Convenor of LINK's Deer Group and Head of Species and Land Management for RSPB Scotland

Paul Walton, Head of Habitats and Species for RSPB Scotland

Bruce Wilson, Vice-Convenor of LINK's Economics Group and Public Affairs Manager for Scottish Wildlife Trust



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