

LINK Consultation Response

Scottish Biodiversity Strategic Framework: Conditions for success and governance outcomes

1 April 2022



Scottish
Environment
LINK

SCOTTISH BIODIVERSITY STRATEGIC FRAMEWORK:

CONDITIONS FOR SUCCESS AND GOVERNANCE OUTCOMES

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Introduction to Scottish Environment LINK

Scottish Environment LINK is the forum for Scotland's voluntary environment community, with over 40 member bodies representing a broad spectrum of environmental interests with the common goal of contributing to a more environmentally sustainable society.

Its member bodies represent a wide community of environmental interest, sharing the common goal of contributing to a more sustainable society. LINK provides a forum for these organisations, enabling informed debate, assisting co-operation within the voluntary sector, and acting as a strong voice for the environment. Acting at local, national and international levels, LINK aims to ensure that the environmental community participates in the development of policy and legislation affecting Scotland.

LINK works mainly through groups of members working together on topics of mutual interest, exploring the issues and developing advocacy to promote sustainable development, respecting environmental limits. This consultation response was written by LINK's Wildlife Group.

1. Response

Scottish Environment LINK warmly welcomes the SBS Conditions for Success and Governance Outcomes paper, and we thank the Scottish Government for the opportunity to submit written comments. LINK members found the workshop extremely helpful and progressive, with genuinely useful break-out sessions. Future workshops along these lines would be welcomed by LINK members.

We welcome the broad direction and content of this paper, and in particular the ambition to put Biodiversity on an equivalent footing with Climate in public policy and government priorities, in recognition of the twin, inter-related crises facing the environment.

We also welcome recognition of the degraded current state of nature – but would urge inclusion of the Biodiversity Intactness Index in context setting for the next SBS, as this brings in a clearer understanding and appreciation of the huge historic losses of nature that need to be factored-in to future action.

On Governance, we feel the role of the environmental NGO sector as delivery partners and agents for change could be better and more explicitly integrated with outcomes currently focused around the government family.

We note a shift in language around ecosystems and nature, from 'restoration' to 'regeneration'. This diverges from the international standard set by the UN Decade on Ecosystem Restoration. This is not necessarily a negative - but to ensure that it is positive we urge that international ecosystem efforts are heeded for useful lessons, and the concept of ecosystem *Resilience* is brought to the fore alongside regeneration.

As we outlined in our response to the Vision and Outcomes Document, the ecosystem approach taken must reflect genuine definable ecosystems rather than very broad land-use types (eg machair, species rich grassland etc rather than 'Farmland', kelp beds, estuaries and sea grass, rather than 'Marine'). In this way a programme of



ecosystem restoration or regeneration can be framed. The Strategy should also reference the UN Decade on Ecosystem Restoration, and be explicit that ecosystem restoration (or regeneration) will build ecosystem resilience in the face of changing and emerging pressures.

The profile of Species remains low, but without some species focus any strategy will fail to capture both the basic building blocks of ecosystems, and the public imagination.

We urge that the IPBES/CBD Five Principal Drivers of biodiversity loss are a theme throughout the various Strategy sections, to ensure that none of these is under-played. For example the establishment of a new dedicated Invasive Non-native Species Inspectorate, and a rolling programme of island restoration and INNS biosecurity, in the face of this growing and intensifying global driver of biodiversity loss, should be considered as key elements of the new structures and programmes initiated under the Strategy.

The next Scottish Biodiversity Strategy needs to explicitly mention the need for funding to support skills development, knowledge transfer, species and habitat monitoring and the organisations supporting volunteers and citizen science groups. It is maybe inferred, but without support for core and staff posts eNGOs will not be able to support these activities and therefore the conditions for success will not be met. We are concerned that these activities are seen as a given, they are referenced but not resourced, and that funding is directed “based on evidence of what works in conservation” towards capital projects, which is a shift we are beginning to see already. A continuing move towards funding ‘projects’ goes against evidence from large charitable foundations, (see this [Esmee Fairbairn Foundation report](#) for example), who have found that the best results are achieved through trusted relationships with delivery partners and unrestricted funding that is used flexibly and efficiently to meet priorities and needs that can change quickly. Funder flexibility in times of crisis have been shown to be key to funder success.

It is positive to see that the Curriculum of Excellence will be used as a tool but if nature activities become a Curriculum of Excellence requirement there will be a statutory duty on schools to deliver outdoor, nature-focused activities and as such will no longer be funded through mechanisms such as trust fund grants. Hence, schools will have to have the budget to spend on these activities.

To be successful, the strategy must be ambitious, challenging and focused on achieving targeted, measurable results. It must also inspire and engage people across society. To reflect that, we propose that the next strategy is called **Scotland’s Nature Emergency Strategy**.

Mainstreaming

Mainstreaming across government is something that has **not** worked to date, but which will be critical if the loss of nature is to be halted and reversed. This remains one of the central challenges in terms of governance. The ideas in the paper appear to appreciate and reflect this but more thinking and outreach across government may be required. Effective integration of the SBS with Agriculture, Forestry, planning and development, for example, will all be critical to success.

We urge careful and collaborative consideration of which governance and mechanisms have worked; which have not worked because they are more fundamentally inadequate or flawed; and which have not worked because they have been under-resourced, under-funded or under-prioritised.



For example, we believe that the Protected Areas network, whilst neither complete nor in optimal condition, will be a key delivery mechanism – and will need monitoring, active management and clear targets on quality in addition to extent.

The Biodiversity Duty, despite being arguably stronger worded in Scotland than other UK countries, has failed to secure either mainstreaming or meaningful progress for biodiversity. One option could be to strengthen the wording of the 2004 Act considerably, reconsidering, perhaps deleting, the section ‘...so far as it is consistent with the proper exercise of those functions’, which has become, we suspect, a vehicle for public bodies to under-prioritise furthering the conservation of biodiversity.

Condition for Success	Governance Outcome(s)	LINK comments
<p>Mainstreaming</p>	<ul style="list-style-type: none"> ● Biodiversity values are mainstreamed into policies, regulations, planning, development processes, poverty reduction strategies, accounting systems, accounts, and assessments of environmental impacts at all levels of government and across all sectors of the economy ● Within government, mainstreaming activity takes place to ensure that <ul style="list-style-type: none"> ○ the Government’s economic strategy reflects the importance of biodiversity to society ○ land-management and other subsidies work to support the delivery of biodiversity in line with our strategic outcomes ○ standards relating to ‘green investment / green finance’ vehicles support the delivery of biodiversity in line with our strategic outcomes ○ compensatory measures are directly funded where there is an overriding public interest in an outcome which is damaging to biodiversity ○ the Curriculum for Excellence aligns to our strategic outcomes ● Businesses assess and, where appropriate, report on their dependencies and impacts 	<p>Successful delivery of the Strategy is highly dependent on full integration across policy areas so that policy and legislation is assessed through the lens of nature, as it is beginning to be with climate. Given the short timescale in which success is needed, integration of the biodiversity duty across all government sectors is now urgently needed with appropriate and transparent reporting to enable progress monitoring.</p>



	on biodiversity, and progressively reduce negative impacts	
Governance Structures and Accountability	<ul style="list-style-type: none"> ● Inclusive, coordinated governance structures (for example between biodiversity, climate change, and land use) result in consensus on priorities, and buy-in among key decision makers. ● Implementation of the Strategy is facilitated through a delivery model based on direct line of sight between governance of strategic outcomes and implementation of actions to deliver them, based on 'live' feedback of their impact ● Implementation of the Edinburgh Process principles of inclusion of all levels of government, including alignment of public body statutory duties with our strategic outcomes ● A regime of statutory targets ensures the priority of key outcomes is embedded ● An independent body such as the Committee on Climate Change or Environmental Standards Scotland reports on progress towards delivery of the strategic outcomes / statutory targets 	<p>LINK strongly supports the allocation of responsibility for assessing progress against the strategy to an independent body (e.g. ESS).</p> <p>Clarity and explicit logic on where this strategy sits in relation to other Government priorities and strategies is needed. The strategy needs sufficient 'rank' among other strategies, alongside cut-through and mainstreaming, to induce change. As the primary vehicle for delivery towards the Environment Strategy vision and objectives as well as the expected international nature targets, all governance structures with full buy-in will be needed for success.</p> <p>The Edinburgh Process offers the best opportunity to ensure wider buy-in and contributions from key stakeholders. Maximising the value of this process will be key to success.</p> <p>Scotland's net zero statutory targets have driven action and biodiversity requires the level of activity. Statutory nature targets are crucial to galvanise, enable and facilitate action across all stakeholders.</p>
Strategic Leadership	<ul style="list-style-type: none"> ● Ministerial leadership of a high-level strategic forum facilitates agreement around priorities, the content of delivery plans and troubleshooting issues 	<p>Ministerial leadership on this will be fundamental to success. We very much welcome the First Minister's</p>



	<ul style="list-style-type: none"> ● Agreed priorities and outcomes contribute to coordinated messaging which helps achieve widespread public understanding and acceptance 	statements on the nature crisis and see full Cabinet leadership as vital.
Funding and Investment	<ul style="list-style-type: none"> ● Sufficient resourcing is available at all levels of government to enable implementation, commensurate with the ambition of the strategy ● Incentives which are harmful for biodiversity have been redirected, repurposed, reformed or eliminated, in a just and equitable way; remaining public and private, economic and regulatory incentives, are positive for biodiversity. ● Investment is directed in line with principles set out in an agreed plan which identifies key priority actions required to deliver our strategic outcomes ● Agreed and transparent priorities and approach allow other funders and private investors to contribute to delivery of the priority actions and strategic outcomes, either through collaboration or alignment ● Just Transition principles are embedded to ensure that incentives to nature recovery and regeneration maintain or increase employment / income ● Our data and evidence infrastructure is able to support the delivery of our strategic outcomes 	<p>Restoring nature is not cheap and finance will be required from public, private and charitable sources. Public funding should be used to pump prime activity where needed, to support action in habitats where other funders cannot or do not operate. This should be used to join the dots and facilitate wider investment, economies of scale and funder value for money.</p> <p>Incentives that harm biodiversity or prevent progress towards nature restoration must be removed. A nature restoration test should be applied to all public and charitable funding and where projects or schemes fail that test, investment should be withheld.</p>
Legislative framework	<ul style="list-style-type: none"> ● The fitness for purpose of the legislative framework is regularly reviewed in order to ensure it is able to deliver the strategy's outcomes ● Sufficient priority is accorded to the strategy's outcomes to ensure any deficit is addressed 	<p>Regular review and iterative delivery will be invaluable in ensuring that actions progress towards delivering the nature targets.</p> <p>Species protections must be strengthened in response to the nature crisis: a precautionary mind-set should be brought to any changes to</p>



		species protection policy or legislation, with improved protection being a required outcome.
Evidence and Data	<ul style="list-style-type: none"> ● A monitoring framework and suite of indicators is in place which provide different / improved information on biodiversity and ecosystem health ● Effective monitoring supports the delivery of the statutory targets ● Harness technological innovation to enable different ways of assessing our biodiversity and support individuals to contribute ● Promote and support citizen science ● funding and other interventions are based on evidence of what works in conservation. 	Government research providers and government research funding should adopt the promotion and delivery of problem solving biodiversity conservation research as a central objective, finding innovative ways to build an evidence base fit to halt and reverse biodiversity losses.
Public Engagement and Communications	<ul style="list-style-type: none"> ● Cross-sectoral mechanisms are in place which develop short and longer-term widely agreed plans for messaging with the aim of achieving widespread consensus and buy-in to the strategic outcomes ● Nature literacy has improved and the links between biodiversity loss, climate change, and land use are clearly established in the public imagination. ● Access to information and sustainable alternatives enables and encourages consumers to reduce the impacts of consumption on biodiversity through their choices ● Harness the opportunities provided by citizen science to support our evidence / knowledge infrastructure ● Local communities and communities of interest are encouraged and enabled to develop projects which regenerate biodiversity 	There is widespread and growing public awareness of the value of nature to people and the planetary need for fully functioning and resilient ecosystems. Building on this awareness, and welcoming and enabling all citizens, through appropriately designed Equality, Diversity and Inclusion mechanisms, to contribute and get involved will be key to success.



This response was compiled on behalf of LINK's Wildlife Group and represents the collective view of the group. Members may also respond individually in order to raise more detailed issues that are important to their particular organisation.

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Scottish Environment LINK the voice for Scotland's environment



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