

5 things you need to know about the Scottish Biodiversity Strategy consultation



Scottish
Environment
LINK

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Introduction

The Scottish Government is [consulting on its new Biodiversity Strategy](#) (SBS) which should define how Scotland will respond to the global nature crisis here at home from now until 2045. This is a key opportunity for the Scottish Government to make good on their ambitious words and show they are taking action for nature. The consultation is also an excellent opportunity for us to use our voices and come together to demand urgent action.

The new Scottish Biodiversity Strategy will follow the 2004 Strategy, [It's in Your hands](#) with the [2020 Challenge for Scotlands' Biodiversity](#). Whilst these strategies delivered some positive projects, ultimately they have failed to halt and reverse the loss of nature. This new strategy must set itself apart and create a step change in action for nature, creating mechanisms to tackle the climate and nature crises together. To be successful, the new 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**.

This briefing sets out five key things that we believe the Scottish Biodiversity Strategy should include to ensure nature restoration. We hope this can help your own response.

1) Set ambitious nature recovery targets

To meet the commitments set out in the Scottish Government's [statement of intent](#) on biodiversity, Scotland's upcoming Natural Environment Bill in 2023 must contain ambitious nature recovery targets. With a commitment to binding nature targets in the Natural Environment Bill, the new Scottish Biodiversity Strategy (SBS) needs to set out how those targets will be met, including through subsequent delivery plans and mainstream biodiversity delivery right across government (see point 5). The bill must specify that the SBS should include policies and proposals to ensure these new targets will be met. Furthermore, the Natural Environment Bill should require annual reporting against progress towards the targets, achieved through the Biodiversity Strategy and other strategies, frameworks and policies. We are unlikely to succeed in saving Scotland's nature without a greater sense of urgency and investment.

With regards to the SBS consultation, the lack of SMART targets and indicators alongside the proposed outcomes is a major failing. Targets are key for providing a clear thread and framework that can be implemented via each respective delivery plan. Targets are also key for helping measure progress towards the milestones and vision set out in the strategy. As drafted, it will be difficult to determine progress towards many of the outcomes.

The EU Commission has released its long-awaited [proposal for legally binding nature restoration targets](#). Applicable to all EU Member States, this new "Restoration Law" is a key element of the EU Biodiversity Strategy for 2030. The Scottish Government has committed to "maintain or exceed" EU environmental standards after the UK's exit from the EU. This policy has been warmly welcomed by eNGOs and has been further underpinned by the "keeping pace" provisions in Part 1 of the UK Withdrawal from the European Union (Continuity) (Scotland) Bill, as passed in December 2020. If these commitments are to be met, the new Scottish Biodiversity Strategy and Natural Environment



Bill will need to reflect the commitments and targets of the EU strategy.¹ We recommend incorporating a target for effective and area-based restoration measures to be in place on 20% of Scotland's land and sea area by 2030, and effective and area-based restoration measures to be in place on all of Scotland's degraded ecosystems by 2045.

Governments across the world are using climate targets to achieve key policy objectives within an agreed timeframe and in a manner that can be measured, resulting in a strong focus for cross-sector action and targeting of resources. We need a [binding headline target](#) to halt the loss of biodiversity by 2030 and secure nature recovery by 2045, in line with the Climate Change (Emissions Reduction Targets) Scotland Act. As part of the Natural Environment Bill, this would support the ambitions of Scotland's Biodiversity Strategy and ensure Scotland plays its part in fulfilling global biodiversity targets and the commitments of the Convention on Biological Diversity.

2) Programmes of ecosystem restoration including species recovery

A habitat-focused approach, working to restore specific ecosystem types via dedicated programmes of action, will enable efforts to be targeted to where it is most needed. The strategy consultation outlines broad land use types but instead should reference Scotland's key ecosystem types, setting out a 2030 vision for each habitat and restoring ecological processes and linkages between them, along with the key steps required to get there. We need the Strategy to include a national programme to restore these places with our most important nature sites protected and nurtured, and wider nature networks to be created so nature thrives everywhere.

Species are the building blocks of our natural environment, but nearly half our species have declined since 1970. We need the Strategy to include a national programme of species recovery targeted at helping threatened species to recover.

LINK's Wildlife Group published a [briefing](#) which outlines a list of Scotland's key ecosystem types, and sets out a 2030 vision for each habitat and restoring ecological processes and linkages between them, along with the key steps required to get there.

3) Adoption of a Scottish Nature Network builds resilience to change

The way in which we use and manage our land and our seas fragments natural habitats and is the top driver of nature loss. An ecologically and cost-effective way to tackle some of the key changes they cause is to adopt a Scottish Nature Network. A Scottish Nature Network links ecological processes across landscapes and in the sea, working with, and around, productive land and sea use. This requires spatial planning and a long-term strategic investment plan to coordinate action towards shared objectives across the planning and land use sectors. It also requires effective partnerships to build success at local, regional and national levels. Joining up sites for nature allows habitats to evolve and species to move across the country in response to our changing environment. A Nature Network across Scotland represents an investment in a wide-reaching natural solution to the nature and climate emergency that will also ensure people can access nature and the mental and physical health benefits it brings.

Scotland's protected areas are our most important sites for wildlife and must be well managed to help nature recovery and strengthen ecological processes. Protected areas should form the backbone of [Scotland's Nature Network](#), to be expanded and connected across the land and seascapes through

¹ Scotland's Biodiversity and its Conservation
<https://www.scotlink.org/publication/scotlands-biodiversity-and-its-conservation/>



restored and enhanced existing habitats and newly created habitat. They should be surrounded by land that is also managed in a way that supports nature and removes barriers to movement. The Scottish Government's commitment to protect 30% of Scotland's land for nature by 2030 is welcome. However, protected areas must be effectively managed to maintain and restore the species and habitats that they are designated to protect. For example, although 37% of Scotland's seas are included in Marine Protected Areas, these are not managed for nature in their entirety and cannot therefore contribute to the 30% target unless MPA management is changed. At the moment, the draft strategy includes no targets or actions for improving and expanding protected areas, this must be addressed.

Scottish Wildlife Trust published a [briefing](#) highlighting why we need to act urgently and decisively to deliver Nature Networks by outlining six priority areas for action if Nature Networks are to be taken forward in an effective and timely manner in Scotland.

4) Sufficient funding for nature

We need to act fast if we are to save Scotland's nature. This requires the right resources in the right place and at the right time. Scottish environmental organisations, in both the public and charitable sectors, [play a crucial role in enhancing our environment](#) and contribute massively towards the delivery of public policy objectives, including the Scottish Government's Biodiversity Strategy and land and sea use policies. Resources do not just come from the Scottish Government: the charity sector invests directly and accesses matched investment in activities that help the Government fulfil its policy objectives and achieve its goals. To face the scale of the challenge of reversing nature loss and to support a resilient environmental sector, this crucial work needs to be adequately funded. Successful action for biodiversity does not happen in a vacuum but needs a supportive and integrated policy framework, delivered in partnership and through investment from multiple sources.

Scottish Environment LINK welcomes the Nature Restoration Fund which commits to at least £13.5 million annually to restore and protect Scotland's nature. From restoring Scotland's wetlands, marine habitats and species and iconic habitats on land, including native woodlands and mountain areas, this commitment to a 5-year Nature Restoration Fund will help drive momentum towards halting the loss and restoring Scotland's nature by 2030. However, the scale of the challenge to halt the loss of nature and restore it is too much for public funding alone. The [Green Finance Institute](#) estimates of £15 - £20 billion to restore Scotland's biodiversity indicates the scale of this challenge. It is imperative that the whole of society is engaged in this process.

Private and charitable financing will also be important for success. However, private investment in this emerging market needs a clear vision and direction for development if it is to succeed. There are 4 key elements to this:

- Public incentives need to underpin the delivery of nature restoration as a public good.
- Perverse and conflicting subsidies that harm the environment must be ended.
- Appropriate regulation is needed to ensure emerging environmental markets deliver genuine positive outcomes for nature and climate.
- Key parts of the market infrastructure needs to be supported by the government. This includes, for example, transparent and robust market assurance to ensure against 'greenwashing'.
- Public money should be used to enable and build supply chain confidence through, for example, long term contracts to incentivise contractors to invest in skills and equipment.

5) Mainstreaming



The Biodiversity Duty in the Nature Conservation (Scotland) Act 2004, despite being arguably more strongly worded in Scotland than other UK countries, has failed to secure either mainstreaming or meaningful progress for biodiversity. One option could be to amend the wording of the 2004 Act considerably, reconsidering, perhaps altering, 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, not just those with a direct biodiversity role, to under-prioritise furthering the conservation of biodiversity.

Mainstreaming biodiversity delivery across government will be critical to halting and reversing nature loss. This remains one of the central challenges in terms of governance. Effective integration of the SBS with agriculture, forestry, planning, public engagement and development, for example, will all be critical to success.

We urge careful and collaborative consideration of those governance and mechanisms that have worked; those that have not worked because they are fundamentally inadequate or flawed; and those that 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. However, it requires better resourcing with monitoring, active management and clear targets on quality in addition to extent.

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 an effective biodiversity duty across all government sectors is now urgently needed with appropriate and transparent reporting to enable progress monitoring. Assessment of delivery against the strategy and forthcoming targets should sit with the Parliament's Rural Affairs and Nature Environment Committee, who should call for evidence to demonstrate progress on a biennial basis and require Ministers and / or the Heads of relevant public bodies and departments to appear before the committee on a regular basis. Environmental Standards Scotland may also have a role, given that the nature emergency is urgent and faster and more effective action to halt the loss of biodiversity and restore it is now urgently needed through better governance mechanisms over the next decade.

Mainstreaming biodiversity delivery is needed for transformative change and progress towards the nature targets. That requires support from wider society. Wider society support is best garnered through the Scottish Government's Open Government commitment. This commitment needs to be more effectively used, to increase transparency and engagement with Scotland's people who should be informing and supporting the delivery of Scotland's Biodiversity Strategy.

Furthermore, there is an urgent need for public engagement to be an intrinsic part of the Scottish Biodiversity Strategy. The Covid pandemic shone a light on the importance and value of nature and greenspaces for our health and wellbeing. Research by NatureScot has shown that [77% of people now get outdoors at least once a week](#), compared to [63% pre-Covid](#). This is a positive habit that's fundamental to tackling Scotland's many public health challenges. However, there is a need for more support for citizen science, outdoor learning, public access and volunteering which spans across multiple policy areas in the Scottish Government. For example, ranger services are key. Rangers play a central role in ensuring protected and conserved areas provide benefits to both biodiversity and people, managing not only habitats and species but also the relationship between nature and local communities.

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.



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