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30 September 2022

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

Dear Ms Slater,

Thank you very much for your time on 20th September and for the discussions on the biodiversity strategy and upland management. We discussed the following points. We ran out of time to discuss building biodiversity into the Climate Change Plan so we have included the details on this topic here.

Scottish Biodiversity Strategy

LINK welcomed the chance to raise our hopes for alterations to the Biodiversity Strategy before its publication.

Thank you for your clarification that the strategy will comprise two parts, with the first setting out the challenges and vision and the second how we achieve the vision. However, we are not entirely clear on this structure. Our understanding is that the strategy will have five-year delivery plans running to 2045. We would appreciate clarity about whether the Part 2 that you mentioned will run to 2045 or just cover the first five years. If it is the latter, then this does not alleviate LINK's concerns, as we do not feel Part 1 is currently clear enough in guiding delivery and this approach risks incoherence and divergence between the delivery plans. It is vital that the central strategy includes headline commitments to a programme of ecosystem restoration and a programme of species recovery, as well as much clearer SMART outcomes for each section. Without these features, LINK does not believe the SBS will be a success. If the new proposal is to have the Biodiversity Strategy in two parts and then the first delivery plan, we are not clear on the need to split the strategy in two. In terms of specific wording for improving the outcomes, you will find suggestions in the LINK and RSPB Scotland responses to the strategy consultation.

LINK warmly welcomes the reaffirmed commitment to nature restoration targets in the Natural Environment Bill. To clarify our position, we did not expect to see all the detail of these targets to be set out in the SBS but we did expect a clear link to be made in the Strategy to both the forthcoming Bill and CBD post-2020 global biodiversity framework, as highlighted in the Statement of Intent, and reiteration of the overarching objective and expected outcome targets, as set out in the Bute House Agreement. It is important for there to be clear readthrough between the SBS and the Bill to ensure that this be a comprehensive package and drive real impact.

Nature Networks

We will continue to call for more urgency and action around Nature Networks, which we see as crucial in halting the loss of biodiversity and in restoring it through ecological connectivity and increased resilience. Ecological connectivity must be at the centre of the SBS and also NPF4. You asked for more detail on this and you can find a briefing from Scottish Wildlife Trust to help with this [here](#). If you would benefit from further information, or have specific questions on our position on delivering Nature Networks, we are happy to assist further.

30x30

We welcome and support the work on defining 30x30 and agree it is important to define what 'protected for nature' means. We published a briefing on 30x30 briefing that starts to do this which you can find [here](#). This is explored in more detail in our forthcoming report on 30x30, which we plan to publish in October. We will share this with you as soon as it is available.

National Parks

You reminded us of the importance of the ongoing work on National Parks and how they will be a big part of how we meet 30x30. The need to make the most of National Parks in meeting 30x30 is clear to us all. We confirmed our commitment to ensure that National Parks can and do deliver for nature, as well as communities, and we agree to send more reps to future workshops in order to provide more views on national parks for the future. We will be responding to the consultation and agree that this is an opportunity to discuss how to change National Parks.

Upland management

We very much support work towards licencing of grouse moors and halting raptor persecution. We agree that all muirburn should be licensed, and burning banned on deep peat, because of the impact on climate and biodiversity. We support the licensing of both the grouse moor area and a named responsible and controlling individual. We support banning burning on peats >30cm in depth (and not more than 50cm as at present) and on shallower peatlands in fragile upland habitats such as on steep slopes or in montane zone. Any Code of Sustainable Moorland Management should be a statutory code and signed off by the NatureScot Scientific Advisory Committee. We would like to see the Scottish SPCA given relatively small additional powers to help investigate and report wildlife crime to aid effective enforcement.

On deer, we are keen to see faster progress on deer management and the reduction of deer numbers, and welcome recent Ministerial statements to this effect. A key test of this new approach will be deer management at Caenlochan where 20 years of voluntary section 7 agreements have had no impact due to lack of cooperation by some landowners. We recommend that the Scottish Government/NatureScot now move swiftly to a section 8 compulsory control agreement to bring densities of deer down to 5-8 per sq km as set out in Cairngorms National Park Plan, in this internationally important site for arctic alpine plant communities. We will feed in priority sites for deer reduction through the Strategic Deer Board as you suggested.

Building biodiversity into the Climate Change Plan.

We welcome the Scottish Government's recognition of the twin environmental crises of climate change and nature loss. We reiterated our concern that action to meet Net Zero ambitions could contribute to biodiversity loss unless analyses of the impact of that action on biodiversity is conducted. We give the example of tree planting, of inappropriate species, in inappropriate places. While reducing emissions is essential, it is also essential that action to tackle climate change is compatible with efforts to restore nature. For example, a drive to increase bioenergy CCS could lead to land use change or inappropriate woodland creation could come at the expense of upland breeding birds.

We urge you to build such analyses into the development of the Climate Change Plan. Given the Government's commitment to address the climate and nature crises at the same time, now is the time to ensure that climate action works in tandem with nature restoration and not counter to it.

The success of the climate change plan is going to require large scale land use change, while simultaneously large scale land use change is required to meet nature restoration targets. To deliver both objectives we need a strategic approach across government that delivers effective climate action whilst minimising impact on nature. This is why we think that building an analysis of the impact on nature into climate mitigation plans is vital. This may take the form of the climate change plan having a section specifically looking at nature.

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.

We look forward to our next meeting with you, which we would hope might take place in January. That would be after the publication of the Scottish Biodiversity Strategy, so the way forward may be clearer and after COP15 has concluded.

Yours sincerely,

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