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Minister for Environment and Land Reform
Scottish Government
St Andrew's House
Regent Road
Edinburgh
EH1 3DG

Dear Ms McAllan,

Thank you very much for your time on 8th February and for the discussions on the forestry grant schemes, Scotland's rainforest and the Wildlife Management Bill. We discussed the following points.

Forestry Grant Schemes

The refresh of the Forestry Grant Scheme (FGS) provides us with the opportunity to update the scheme to respond to policy priorities, current and future challenges and remove barriers to access and delivery of the schemes. LINK welcomes the public consultation and the level of engagement of NGOs across areas in government.

We have attached a briefing by the LINK Woodland Group that outlines key recommendations to inform the upcoming FGS review. The summary of asks include:

- Diversify the species, age and structure of forests to increase their resilience and create more scope for community and local business use.
- Increase support for management of existing woodland.
- Support and facilitate sustainable deer management.
- Increase support for natural colonisation and regeneration to achieve a significant proportion of our woodland expansion aims for the future.

We have also attached the slides Arina Russell (Woodland Trust Scotland) presented at the meeting on FGS.

Scotland's Rainforest

LINK welcomes the Minister's announcement of Scottish Forestry's new Rainforest Action Coordinator who will be appointed to help the Scottish Government meet its commitment to restore and expand Scotland's rainforest.

We welcome the wording of the priority action within the Scottish Biodiversity Strategy draft to 'Develop a policy and investment framework for restoring Scotland's Atlantic Rainforest'.

Wildlife Management Bill

LINK welcomes the Scottish Government proposals published for consultation which will form a new Wildlife Management Bill. With regards to grouse moor licensing, we must licence both individuals and areas to ensure appropriate accountability and ease of enforcement. We understand that there will be two codes of practice, on sustainable grouse moor management and muirburn, and both need to be clear and enforceable underpinned by legislation. We encourage the Scottish Government to implement cost recovery and charge for licences to ensure that the NatureScot budget is not more widely diminished and other conservation priorities adversely impacted.

Muirburn should be banned on deep peat, because of the impacts on climate and biodiversity and so as not to undermine welcome Scottish Government investment in peatland restoration. We support a deep peat definition of >30 cm in depth in line with Peatland Code and international ecological standards. Consideration also needs to be given to protect shallow and fragile peatlands particularly at high altitudes and which are at high risk from erosion.

We strongly support additional powers for the Scottish SPCA to investigate and enforce wildlife crime beyond their current welfare powers. Scottish SPCA already works in close cooperation with the Scottish Police Service and their additional and experienced resources could be made available at limited cost to the Scottish taxpayer.

Governance/Environmental Court consultation

This item was raised in relation to the Continuity Act which is scheduled for the summer. We want the consultation to be substantial and build on the previous consultation, which demonstrated strong support for an environmental court. Nothing came of that because of Brexit and we are now back to reviewing, discussing and consulting on the question of the broader context of a changed government regime. This is an opportunity for Scotland to lead the UK and our ambition for human rights – e.g., via a Human Right to a Healthy Environment.

LINK's campaign on Highly Protected Marine Areas (HPMAs)

LINK's campaign Save Scottish Seas has launched an e-action '[Create ocean recovery zones for Scotland's seas](#)'. This is in response to the Scottish government asking for views on proposals to give highly protected status to at least 10% of Scotland's seas. Responses to the e-action will be sent directly to the consultation inbox.

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.

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

Lloyd Austin, Convenor of LINK's Governance Group

Arina Russell, Public Affairs Manager, Woodland Trust Scotland

Alan McDonnell, Programme Development Manager, Trees for Life

Dan Paris, Advocacy Manager, LINK

Juliet Caldwell, Advocacy Officer, LINK.