

2nd March 2023

Minister for Green Skills, Circular Economy and Biodiversity
Scottish Government
St Andrew's House
Regent Road
Edinburgh
EH1 3DG

Dear Ms Slater,

Thank you very much for your time on 9th February and for the discussions on the Scottish Biodiversity Strategy and the 30x30 commitment. We ran out of time to cover the whole agenda so we have summarised the following points.

Scottish Biodiversity Strategy (SBS)

LINK welcomed the publication of the Scottish Biodiversity Strategy draft on 13th December which has the potential to be instrumental in turning the tide on nature loss. The SBS needs to reverse biodiversity loss and restore nature: this is clearly stated as the overarching goal of this strategy. The commitment to introduce a programme of ecosystem restoration is positive and, if effectively delivered, can help nature recover at scale.

We also welcome the twenty-six priority actions outlined to restore Scotland's natural environment and halt the loss of biodiversity by 2030. It is also great to see new outcomes for making our best nature sites larger, better connected and in good condition, and improving the abundance and distribution of species – two areas which had been missing from the previous draft.

However, there is still work to do. The actions for species are a continuation of the current situation, which is inadequate for meeting the outcomes: the strategy must go further and include a headline commitment to a national programme of species recovery. Ecosystem restoration won't be enough to save Scotland's iconic and internationally important species - they need additional action. You could draw a parallel to any education system: different pupils need different approaches and support to thrive. Diversity is a strength but it needs to be actively supported, otherwise those species that don't fit with wide scale habitat restoration will be lost such as the twinflower.

Delivery Plans

Thank you for your most recent letter to the Stakeholder Engagement Group regarding the next steps of the SBS process. We are looking forward to engaging with yourself, the Scottish Government Biodiversity Unit and NatureScot in the workshops.

We have been assured that delivery partners will be included in the design process of the SBS delivery plans from the beginning. However, we are aware the delivery plan process has not been a co-design exercise but has instead been kept in-house with NatureScot and the Scottish Government. We are disappointed in this shift in engagement since the previous biodiversity strategy from which we were much more involved.

Engagement with the eNGO sector as delivery partners is vital as we, as a sector, will be delivering the priority actions on the ground.

30x30 commitment

We would like to thank you for your positive reception of LINK's most recent report ['Protecting 30% of Scotland's Land and Sea by 2030'](#). We have engaged with the NatureScot co-design workshops for 30x30 which were held in autumn last year. We look forward to seeing the framework draft prior to the consultation in the Spring.

We are continuing to focus on the opportunity to improve our protected areas and ensure they are effectively managed and monitored for nature. With regards to National Parks reform, we think this is going in a really positive direction. We are keen to see some of the great proposals taken forward.

Invasive Non-Native Species (INNS)

It was positive to see that there is a pointer to the Scottish Plan for INNS surveillance, prevention and control in the SBS draft.

Greater priority must be given to tackling INNS as a prerequisite to successful nature restoration. This will require a strategic approach, building on the hierarchy of prevention, rapid response, and strategic control and containment, delivered at a landscape and catchment scale.

LINK is currently developing a detailed report on tackling INNS in Scotland which we can share with you in advance of publication.

Agriculture priority actions

You will be aware that the success of the Biodiversity Strategy will depend upon changing farming practices, and the importance LINK places on the new Agriculture Bill and subsequent funding system to deliver the necessary change. LINK believes that at least three quarters of public spending on farming should directly support methods of food production that restore nature and tackle climate change. In practice this must mean that most funding is in Tiers 2-4 and that we move away from a system of direct payments as envisaged in Tier 1.

We cannot, however, wait for the introduction of the new system if we wish to make substantial progress in this decade. There are actions that can be taken now to improve environmental outcomes in farming. One major potential change would be the introduction of capping of direct payments, allowing for redistribution within the farming budget to deliver more money for nature- and climate-friendly farming. We urge you to ensure that this message is heard across government

and would strongly encourage you to push for progress in both the design of the new system and in the interim.

Natural Environment Bill

LINK welcomes the commitment to a Natural Environment Bill which will put in place key legislative changes to restore and protect nature, including legally binding nature recovery targets to halt the decline of Scotland's biodiversity by 2030. We are aware that there is still a lot of work to develop what these targets and indicators actually look like. LINK would like to contribute to this process to make sure that we have targets that are fit for purpose and drive change and avoid weak ineffective targets which could perpetuate the status quo.

It would be helpful to have any further information about the process and timescales for developing the targets. We would like to emphasise the importance and value of engaging with the eNGO sector from the beginning of developing the targets.

We are also keen to understand what work the Scottish Government is undertaking around the EU Restoration Law. LINK are very supportive of this ambitious legislative proposal and would encourage the Scottish Government to consider how the key targets could be integrated into the Natural Environment Bill as part of 'keeping pace' with the EU.

LINK is in the process of producing a proposal that outlines strong, meaningful SMART targets that will deliver net gains for nature, and establish statutory processes to ensure implementation. We will be pleased to engage with Scottish Government officials as these proposals are developed, to inform development of the Natural Environment Bill. A preliminary meeting is already arranged for March, and we'd hope this can be the start of a regular engagement.

Retained EU Law Bill

Scottish Environment LINK opposes the Retained EU Law Bill and is deeply concerned over the potential impact in devolved areas. The Bill is deregulatory by design and poses significant risks to our natural environment. We think this is important for you to be aware of, due to the implications for your brief. We have been doing work at coalition level to highlight the risks of the approach taken in the Bill and press for it to be withdrawn. We provided [written evidence](#) to the Scottish Parliament's Constitution, Europe, External Affairs and Culture Committee on the Retained EU Law Bill. We have also contributed to and supported Greener UK's briefings to MPs and Peers at Westminster. We would be happy to discuss this further.

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.

As the meeting was cut short, we have suggested to your office that we try and arrange our next catch-up sooner than might otherwise have been the case. Perhaps, you would agree that April would be suitable?

Yours sincerely,

Deborah Long, Chief Officer, LINK

Paul Walton, Head of Habitat and Species, RSPB Scotland

Lloyd Austin, Convener of LINK's Governance Group

Arina Russell, Public Affairs Manager, Woodland Trust Scotland

Dan Paris, Advocacy Manager, LINK

Juliet Caldwell, Advocacy Officer, LINK

Isobel Mercer, Senior Policy Officer, RSPB Scotland

Calum Duncan, Head of Conservation Scotland, Marine Conservation Society

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