



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

17 May 2023

Dear Ms Slater,

Thank you very much for your time on 9th May and for the discussions on the current political context around environmental measures, working together moving forward, Scottish Biodiversity Strategy and the Natural Environment Bill.

Current political context around environmental measures

We discussed the importance of working together to further the environmental agenda, whilst addressing pushbacks to specific policies with fairness and plans of how best to engage communities.

We discussed the importance of learning from international examples. For instance, the EU is experiencing similar challenges in relation to environmental issues with some political opposition to the proposed Nature Restoration Law. LINK will continue to track the progress of the EU Restoration Law and speak to our civil society colleagues in the EU to understand how these challenges are being addressed. This is an ambitious law that we want to see Scotland keep pace with through the Natural Environment Bill.

Working together to engage community voices with environmental policies

We discussed the forthcoming Natural Environment Bill and the need to gain cross society support to make it successful. In light of the prominent concerns raised from rural and coastal communities around HPMA's, it is vital that we give everyone a voice to engage in these important discussions so we can make sure nature policy works for people, climate and nature. It is our strong belief that the successful adoption of policies to restore nature requires deep and meaningful engagement with relevant stakeholders and delivery partners, including environmental NGOs and local communities, that should go beyond paper consultation exercises. Regional Land Use Partnerships are one potential mechanism that could allow for such an approach, although the current level of political investment in this approach is insufficient to build the consensus required. We suggested a few specific examples of ways the Scottish Government can engage with local communities:

- There are numerous agricultural shows whereby members of farming and rural communities attend. We suggested that the Scottish Government has a presence at these shows in order to engage in discussions

with local people who may have concerns or interests in forthcoming environmental legislation such as the Agriculture Bill.

- The Just Transition Commission is a useful existing mechanism that can be used to bring in a wide range of views. It can be helpful in balancing misrepresentation and highlighting the evidence base for interventions to restore nature/in nature policy.
- The Scottish Government's [commitment](#) to a Citizens Assembly is an alternative lever which could be used to help build consensus for change.

On a broader point, the proposals for public engagement in the Scottish Biodiversity Strategy are lacking in specificity and urgency. We suggest that much greater prominence is given in the Strategy as to how ongoing, collaborative, and community-driven engagement is mainstreamed in nature conservation and restoration.

LINK will continue to engage MSPs on a cross-party basis to build support for action to protect nature. For example, the Nature Champions initiative is a helpful tool that can be used to engage MSPs in key environmental discussions.

LINK reiterated its support for reforming National Parks to have a stronger emphasis on nature restoration into the future, but noted that this is a policy area that should be a specific focus for the Scottish Government to invest in local and community consultation and engagement early on in the process.

Scottish Biodiversity Strategy

LINK members have been engaging in pre-consultation workshops organised by NatureScot on the development of the first delivery plan in the Scottish Biodiversity Strategy. This hasn't been an adequate process due to insufficient time and capacity being put into the design of the workshops. The timescale between the end of the internal SBS process and the start of the pre-consultation workshops has been too short for efficient engagement. This has led to high levels of frustration from LINK members due to low capacity within their organisations.

There has been further concern over the lack of marine actions in the pre-workshop materials and no clear process of pre consultation engagement. This risks, we believe, a further backlash on marine conservation measures, despite the urgent need for effective marine conservation actions. It is vital that the Scottish Government engages stakeholders effectively on these measures.

LINK has explicitly asked NatureScot and the Scottish Government not to call this process 'co-design' as it has instead been stakeholder consultation. We are disappointed not to have had better early engagement and by the rushed and non systematic process. However, we are all working towards the same goal and we will continue to engage in the process to support NatureScot and the Scottish Government in producing an ambitious Scottish Biodiversity Strategy and subsequent delivery plans.

We appreciate your offer for LINK to directly send you key points or missing actions within the draft strategy and first delivery plan.

Natural Environment Bill

LINK has convened a working group to develop our thinking on nature targets. This work reflects the key campaign asks from LINK's [Fight for Scotland's Nature](#) campaign which called for legally binding nature targets.

LINK has commissioned a report in advance of the Natural Environment Bill consultation and has been in discussion with members of the NE Bill team at Scottish Government. The plan is to share the latest draft with the Scottish Government before the end of May for comment. This work aims to put nature on the same footing as tackling climate change. We have appreciated the current level of engagement that LINK has had with the NE Bill team and look forward to continuing to work together.

State of Nature Report

The next State of Nature report is due to be published on 28th September. A dedicated Scotland report is going to be produced, which LINK is supporting. The report will include headline figures on trends in average species abundance, threat levels (IUCN red lists), and other metrics. As a preview, the average abundance trend is down with notable significant declines in lichens, bryophytes and vascular plants. Discussions among officials, NatureScot, Marine Scotland and the other members of SoN partnership are underway with regards to the content. It will include a Historic Losses section to set the context. It is neutrally branded and will be launched as a partnership effort. This will be a key moment for the narrative around the nature crises.

We discussed the need for accompanying communications to address the concrete actions needed to back up the data in the State of Nature report.

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 hope will take place in September.

Yours sincerely,

Deborah Long, Chief Officer, LINK
Juliet Caldwell, Advocacy Officer, LINK
Aedán Smith, Head of Policy and Advocacy, RSPB Scotland
Isobel Mercer, Senior Policy Officer, RSPB Scotland
Bruce Wilson, Head of Policy and Advocacy, Scottish Wildlife Trust



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