



SCOTTISH GOVERNMENT REVIEW OF NATIONAL OUTCOMES

CONSULTATION RESPONSE

Introduction to Scottish Environment LINK

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.

Its member bodies represent a wide community of environmental interest, sharing the common goal of contributing to a more sustainable society. LINK provides a forum for these organizations, enabling informed debate, assisting co-operation within the voluntary sector, and acting as a strong voice for the environment. Acting at local, national and international levels, LINK aims to ensure that the environmental community participates in the development of policy and legislation affecting Scotland.

LINK works mainly through groups of members working together on topics of mutual interest, exploring the issues and developing advocacy to promote sustainable development, respecting environmental limits. This consultation response was written by LINK's Governance and Sustainable Economy Groups.

Response

1. Outcomes

Some general comments:

To encourage scrutiny against all outcomes in the development of policy, LINK members are not in favour of any increase in the total number of outcomes and would, ideally, like to see fewer outcomes. In Wales, the fact that there are only 7 Future Generation Goals means that it is practical for policy makers to consider all 7 goals in developing policy. What has tended to happen in Scotland, is that those outcomes considered of most relevance to the policy area under development or scrutiny are used, which somewhat defeats the purpose of the National Performance Framework in policy coherence.

Moreover, the structure and content of the National Performance Framework and the National Outcomes needs to be better integrated with, and recognise, the various statutory targets that have been agreed (or will soon be agreed) by the Scottish Parliament. These include:

- The emissions' reductions targets, set by the Climate Change (Scotland) Act 2009, as amended;
- The forthcoming "statutory targets for nature restoration"; and
- General duties such as that to protect and enhance the health of Scotland's seas (s.3, Marine (Scotland) Act 2010 and to further the conservation of biodiversity (s.1, Nature Conservation (Scotland) Act 2004).

LINK members would like to see some additional priorities reflected in Scotland's following outcomes:

Economy outcome to include: ' We have a wellbeing economy which is zero carbon and nature-positive. Our economy must align with sustainable levels of raw material consumption and minimal levels of pollution'



Environment outcome to include: ‘A duty to act in such a way as to protect and enhance the environment in other countries’. The environment outcome vision to include: ‘We minimise environmental degradation overseas through supply chain due diligence and responsible consumption’ and ‘We use natural solutions to mitigate and adapt to climate change where effective.’

International outcome to include: ‘We recognise and make efforts to reduce our international footprints and social impacts from our supply chains’.

Human rights outcome to include: ‘We will address the disproportionate impact of environmental harms on marginalised places and people whose rights are most at risk.’

2. Indicators

Existing indicators	Issues
Access to green and blue space	Quality of the space is not considered - the definition should include reference to high quality and nature value.
Economic growth	GDP needs to be broken down into GDP that relates to ‘nature positive / zero carbon’ activities and other GDP such that we can distinguish the element of growth that is compatible with a nature positive, zero carbon future. GDP is given too much emphasis - other wellbeing economy indicators need to be given more profile in terms of frequency and timeliness of reporting.
Carbon footprint	Needs to be more timely
Natural capital	NCAI still needs refinement. Supporting services are not well covered: eg soil health, nutrient cycling, water cycling, photosynthesis or pollination. NC Accounts are still flawed i.e. overfishing shows an increase in returns but doesn’t take account of asset depreciation.
Condition of protected sites	Whilst we support retaining this indicator within the NPF, ScotLINK have consistently raised issues with how data is reported under this indicator. This is due to features assessed as ‘unfavourable recovering’ and ‘unfavourable recovering due to management change’ (URDTM) being reported as ‘favourable’ under the indicator, which portrays a misleading picture of the health of our best nature sites. For example, the proportion of features <i>reported</i> as favourable as of March 2023 is 76.4%, but in reality, around 65.2% are <i>currently assessed</i> as being in favourable condition (and this has not improved since 2007).
Waste generated	This currently only includes household waste. It should include all categories of waste - household, commercial and industrial, and construction wastes. It should also include the proportion of the waste that is recycled and the carbon content of the waste.
Biodiversity	Suggest: Biodiversity is highly complex, dynamic, multi-layered and imperfectly understood. There are two central considerations that must be accounted for. First, if data are aggregated too broadly, important factors and issues become masked and missed by the indices. Second,



	<p>systematic, statistically valid runs of data on species are too short, often beginning after periods of known but not quantified historic losses of biodiversity.</p> <p>To account for these, we urge that:</p> <ol style="list-style-type: none"> 1. Any heavily aggregated indices - like the combined biodiversity indicator - are explicitly underscored by finer-grained metrics that highlight particular groups - for example, groups that are of major functional significance - like pollinators - and groups for which Scotland has international responsibilities, like seabirds. 2. That the Biodiversity Intactness Index, which is indirectly but quantitatively sensitive to historic losses of biodiversity (by comparing the species composition of given habitats with that of comparable habitats where human impacts are at a historic minimum), is included in future metrics. We recommend that research effort is devoted to examining what actions would be required to improve the intactness of Scotland's biodiversity as in this metric.
Clean seas	Plastic should be included as a monitored contaminant.
Missing indicators	
Condition of freshwaters.	Freshwaters are one of the most monitored ecosystems in Scotland. The data generated by the Water Framework Directive monitoring could be used in an indicator for overall conditions of freshwaters in Scotland.
Air pollution	
Raw material consumption	Raw material consumption is published in ZWS Material flow accounts and is an important indicator related to the environment and economy outcomes. It is currently unsustainably high.

3. How the National Performance Framework could have a bigger impact

As part of its 2021 Programme for Government, Scottish Government committed to ‘move beyond GDP as the only measure of national progress.’ Part of this response included the introduction of a Wellbeing and Sustainable Development Bill which would place ‘duties on public bodies and local government to take account of the impact of their decisions on sustainable development, in Scotland and internationally.

[Research published by Scotland's International Development Alliance](#) recommends that the national outcomes are placed at the service of delivering SD through a ‘policy-coherent’ approach. An amended version of Part 1 of the Community Empowerment (Scotland) Act 2015, concerning national outcomes, would be transferred into the Wellbeing & Sustainable Development Bill. As the Bill is likely to contain clear definitions of sustainable development and policy coherence for sustainable development, it will help to ensure that there is no confusion



or conflict in the development and implementation of public policy, as public bodies work to contribute to national outcomes.

Experience in Wales suggests that the creation of a Commissioner, who will both support and monitor public bodies' implementation of their duties and contribution to the National Outcomes, would enhance the impact of the National Performance Framework.

An annual debate in parliament on the National Performance Framework could raise the profile of the Framework and increase scrutiny.

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Scottish Environment LINK the voice for Scotland's environment



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LINK is a Scottish Charity (SC000296) and a Scottish Company Limited by guarantee (SC250899), core funded by Membership Subscriptions and by grants from NatureScot, Scottish Government and Charitable Trusts.

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