Scottish Environment LINK
5 Atholl Place
Perth
PH1 5NE
T: 01738 630804
E: enquiries@scotlink.org
W: www.scotlink.org

20 July 2023

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

Dear Ms Slater,

At the previous quarterly catch up with Scottish Environment LINK on 9th May, you invited members to write to you directly and provide feedback on the Scottish Biodiversity Strategy (SBS) Delivery Plan and workshop process. Thank you for this opportunity.

Workshop Process

NatureScot and Scottish Government officials organised four workshops across May - June to allow for LINK members to provide comments and to discuss the first delivery plan draft of the SBS before it opens for consultation in the Summer. The workshops were a very welcome improvement in the level of engagement with eNGOs, when compared to the preceding months and years. The level of engagement remains below that of the previous SBS to 2020 however.

The workshops were a late and rushed response. LINK would characterise the workshops as a very welcome consultation, and are grateful for the efforts of staff involved, but this was not an example of co-design. We would appreciate Scottish Government and NatureScot respecting LINK's view on that wording around the process.

We welcomed the level of ambition and the vision captured in last year's draft biodiversity strategy. It is vital that this ambition is reflected in the delivery plan.

Delivery Plan Draft Content

We welcome the very significant effort that has been devoted to mainstreaming biodiversity across the government family via 'logic modelling' and understand that this has restricted the level of co-design that NGOs could be offered during the process.

However, our impression now is that this effort is risking the Delivery Plan becoming mostly a collection of actions and programmes that are already in train across government, or already planned – and that meaningful new action, which will inevitably impact budgets and work programmes, has not sufficiently emerged from these internal processes.

Partly as a result of the above, we have substantial outstanding concerns on the proposed content of

the Delivery Plan. There are some ambitious actions that we welcome and strongly support, and we have passed that on to NatureScot. However as currently drafted, the actions will not be adequate to deliver the elevated vision and ambitions so well-articulated in the draft SBS, and which the country so badly needs.

The biological outcomes within the 5 years of the first Delivery Plan (in 2027 and therefore only 3 years before the 2030 deadline) are not consistently outlined. They are fundamental to success and need to be clearly defined so we know what the actions will achieve as well as be able to measure progress towards them.

We recommend revising the draft actions to include:

1. A clear proposal for the national programme of ecosystem restoration

We warmly welcome the commitment in the SBS to a national programme of ecosystem restoration. This will be fundamental in halting and reversing biodiversity loss. The first SBS delivery plan must set out a clear model and plan for rolling out this programme of ecosystem restoration across Scotland's ecosystems. It currently fails to do this. Current proposals look to be a collection of actions from existing wider ScotGov plans and programmes already in train, or planned, rather than a dedicated programme of new work that will add value.

The Delivery Plan in our view must identify a pipeline of specific priority ecosystems that will be targeted by the programme. We suggest that it should cover this list here. We recognise that there may need to be a process of prioritisation to take forward a subset of these ecosystems in this first delivery plan. If this happens, the process used to carry out the prioritisation must be shared, and comment sought on its application. We know from some excellent work on peatlands that the Scottish Government can design, fund and deliver targeted ecosystem restoration. We should tailor and extend that model to other key ecosystems in a phased, rolling programme.

2. A commitment and proposal for a national programme of species recovery

A programme of species recovery is also vital. An assumption that if ecosystem restoration works, then all threatened species will automatically recover is widespread currently in government but is in our view unsafe and ecologically inaccurate. So far however the SBS only commits to 'continue effective species recovery', presenting no added value beyond existing initiatives, and the draft actions in the Delivery Plan are not coherent or sufficient. Whilst ecosystem restoration is vital, it will not address declines in some of the priority species for which Scotland bears international responsibility, unless additional targeted actions are taken. We propose that the Species at Risk initiative (involving NatureScot and NGO partners) should be seen and resourced as an in-practice revision of the current Scottish Biodiversity List. This approach should underpin a National Programme of Species Recovery targeted at threatened species.

3. SMART actions

LINK has consistently raised the need for actions and targets in the SBS and delivery plan to be SMART. However, the draft actions remain extremely vague and lack detail about how, when and by whom they will be delivered. We are concerned that this will result in a lack of uncertainty about what the government is committed to, who is responsible for delivering actions, exactly what is expected of sectors and individuals, and ultimately will lead to further delays in real, tangible action for nature.

As Scotland is committed to keeping pace with EU standards through the Continuity Act, arguably we could be falling behind if we don't set similar targets as set out in the EU Biodiversity Strategy for 2030. LINK will be benchmarking the SBS against the EU Strategy.

4. Actions for protected areas

The commitment to protect 30% of Scotland's land for nature by 2030 is welcome and we understand that a separate strategy to deliver this target is currently in development. However, we urge the Scottish Government to retain some clear, headline actions for improving protected areas in the Delivery Plan. This can signpost to more detail in the 30x30 strategy, but the Delivery Plan will be a key reference document for multiple stakeholders working on biodiversity and must reiterate a clear commitment by the Scottish Government to our protected areas, set out the role for protected areas in delivering for ecosystems, habitats and for species, and some headline actions needed to improve our existing protected areas such as delivering a new Monitoring Strategy and ensuring effective management of all sites.

5. Marine

The Delivery Plan so far lacks any marine content. We understand that a subsequent workshop to discuss the marine content within the delivery plan has been organised at the end of July, but we are concerned that including complex marine considerations effectively may require considerable new effort, and time is now short. We would look to see marine species and ecosystems included in points 1 and 2 above.

Unless these five areas are addressed then we believe it is unlikely the Delivery Plan will achieve the Scottish Government's ambitions to halt and begin to reverse the loss of nature by 2030.

We strongly urge the Scottish Government to revisit the welcome ambition and vision set out in the draft Scottish Biodiversity Strategy and ensure that the actions are developed in a coherent way that prioritises the actions that will have the biggest benefits for nature.

We hope this is a useful contribution to the process and we would be very happy to discuss this further.

Yours sincerely,

Deborah Long, Chief Officer, LINK
Alistair Whyte, Head of Plantlife Scotland & Convener of LINK's Wildlife Group