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Our Reference: 202500451737  
Your Reference: Letter from Scottish Environment LINK

11 March 2025

Dear Juliet Caldwell,

Thank you for your correspondence dated 6 February, following our meeting to discuss the Natural Environment Bill, invasive non-native species, Schedule 1 license monitoring, and beaver translocations.

With regards to the Natural Environment Bill, as you will be aware, the Bill has now been introduced to the Scottish Parliament and includes provisions to establish a framework for statutory targets to improve biodiversity. The targets form a key element of the Strategic Framework for Biodiversity, which also includes the Scottish Biodiversity Strategy and the 6 yearly rolling Delivery Plans.

I note in your letter with thanks, the invitation to meet with you again following the Bill's introduction to parliament. My Private Office will be in touch with a suitable date shortly. In the meantime, officials in the Natural Environment Bill Unit would welcome the opportunity to meet with you to discuss the points you raised in your letter and provide further details of the provisions in the Bill.

We welcome the views and input of SE Link into the development of the Natural Environment Bill. However, it has not been possible to include all suggestions from stakeholders that are related to nature and the natural environment in the Bill. Like all Bills, it is essential that the Natural Environment Bill is of a manageable size, and that the provisions it contains have undergone rigorous consultation and stakeholder engagement in order to ensure that it can successfully pass through parliament in a reasonable time and before the end of the current parliamentary session.

Unfortunately, this means taking a realistic and pragmatic approach about what can be delivered through a single Bill. That said, not all the actions required to meet the Scottish Government's

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commitments to restore the natural environment and halt biodiversity loss will require primary legislation. The Natural Environment Bill is only one part of the ambitious programme of work being taken forward to address the biodiversity crisis in Scotland.

A Key Action in our Scottish Biodiversity Strategy Delivery Plan is to “Implement the Scottish Plan for INNS Surveillance, Prevention and Control and secure wider support measures to enable long-term effective INNS removal at scale”. The INNS Plan will build on the actions contained within the GB INNS Strategy on which we are already working closely with the UK and Welsh governments. While we have used the GB INNS Strategy as the starting point for developing our Scottish INNS Plan, we are seeking to engage as widely as possible with Scottish stakeholders in order to develop an INNS Plan that will meet Scotland’s specific needs. We will be consulting on the Plan later this year and we aim to publish it before the end of the year.

I would like to take this opportunity to thank you for your suggestions, which I have noted, and will consider fully as we develop our Scottish INNS Plan over the coming months.

In relation to game-bird releases and concerns around Highly Pathogenic Avian Influenza (HPAI), please be assured that the Scottish Government has a robust suite of legislation, associated contingency plans and measures which, when applied, are designed to halt the spread and ultimately eradicate the virus.

As with all captive birds and mammals, it is a legal requirement that the location of captive gamebirds are registered on the Scottish Kept Bird Register (SKBR) and any signs of notifiable disease must be reported immediately to the Animal and Plant Health Agency (APHA).

Once such a report is made, restrictions are served on the premises whilst the premises is investigated which includes prohibiting the release of gamebirds. Should HPAI be confirmed following investigation, disease control zones would be implemented putting a range of further measures in place in areas surrounding the infected premises, in order to mitigate against further spread of the virus and gamebird releases would be prohibited in any such area.

The requirement for the licensing of gamebird release sites adjacent to Special Protection Areas and Special Areas of Conservation, which is undertaken by NatureScot in Scotland, also provides the Scottish Government with the powers to control the release of gamebirds from sites considered to be of conservation concern. The prevalence of HPAI in the local area can be a reason for licences to be withheld.

I also note your concerns in relation to Schedule 1 licencing and beaver translocations and can confirm that Scottish Government officials will continue to engage directly with NatureScot on these matters.

In response to your points on lead ammunition, the Scottish Government recognises that the use of lead in ammunition continues to pose risks to both human health and the environment. We prioritised lead in ammunition for inclusion in the first UK REACH workplan, and in spring 2021, the Scottish Government worked with the Welsh Government and Defra to request the Health & Safety Executive (HSE) and Environment Agency (EA) to prepare a restriction dossier on lead in ammunition. As you have highlighted, HSE published their final Opinion on proposals for a restriction on lead in ammunition in December 2024.

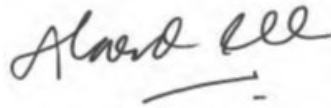
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The UK REACH restriction process is as set out in the legislation. Although details of the proposal cannot be discussed at the risk of prejudicing the Ministerial Decision, I want to reiterate the Scottish Government's commitment to act on lead in ammunition, and support the implementation of legislation as swiftly as possible as there is a recognised issue for the environment and human health.

I and my fellow Ministers look forward to continuing to work closely with SE LINK and its members towards our shared goal of a nature positive future for Scotland.

Yours sincerely,



**ALASDAIR ALLAN**  
**Minister for Climate Action**

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