

# An Ocean Recovery Plan for Scotland – 2020-2023 review

April 2025

## Key points:

- Scottish Environment LINK published a review of their 2020-2030 Ocean Recovery Plan, assessing progress between 2020 and 2023.
- On a total of 58 actions, only 7 were assessed as “in good progress or achieved”
- Looking ahead to 2025- 2030, there is a clear need to address the gaps in implementation and to accelerate action if Scotland is to reach its international commitments.

## Introduction

Scotland’s ambition has long been to be a global leader in environmental and marine conservation action. In 2020, Scottish Environment LINK introduced an [Ocean Recovery Plan](#), urging the Scottish Government to recover the health of Scotland’s seas by 2030. This plan called for:

1. Create legally binding targets for ocean recovery
2. Strengthen the Marine Protected Area (MPA) network for ocean recovery
3. Reform fisheries for resilience
4. Invest for our future

Progress towards the Ocean Recovery Plan asks between 2020 and 2024 has been [independently reviewed](#), assessing the Scottish Government's efforts towards achieving ocean recovery goals. This review marks an important checkpoint on Scotland’s journey to recover its marine ecosystems.

## Progress assessment

The Ocean Recovery Plan calls for 58 actions to be implemented in 2020 - 2024. The review shows that **only 7 were assessed as “achieved or in good progress”**.

### 1. Creating legally binding targets for Ocean Recovery: *4 of 39 asks achieved or in good progress*

In 2018, UK administrations collectively failed to achieve 11 of 15 indicators of Good Environmental status (GES) under the UK Marine Strategy. In 2024, the outlook remains much the same. The Natural Environment (Scotland) Bill will be crucial to set legally binding nature recovery targets and create a framework for monitoring, enforcing, and reporting targets.



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Key policy frameworks needed to improve management of activities at sea, including the National Marine Plan 2 and Regional Marine Plans are facing significant implementation delays, stalling broader conservation efforts.

## **2. Strengthening the MPA network: 2 of 7 asks achieved or in good progress**

The MPA network has expanded, with four new inshore designations for mobile marine species, 12 for seabirds (SPAs) and the Red Rocks and Longay MPA to protect flapper skate egg sites. Despite having a network of MPAs encompassing 37% of its seas, **most of Scotland's MPAs do not have restrictions in place for some of the most damaging or widespread fishing pressures.** The Scottish Government's own deadlines to consult on and adopt fisheries management measures across the full MPA network, and for the protection of Priority Marine Features (PMFs) outside MPAs, have been repeatedly missed. A consultation on the fisheries management measures in offshore MPAs was published in 2024. It is crucial that fisheries management measures are implemented in all Scottish MPAs in this Parliamentary term.

## **3. Reform fisheries for resilience: 0 of 9 asks achieved or in good progress.**

The UK Joint Fisheries Statement (JFS) adopted under the UK Fisheries Act (2020) lists 22 proposed Fisheries Management Plans (FMPs) for Scottish stocks, but their implementation is significantly delayed and the deadline pushed back to the end of 2026.

Partial progress toward fully documented fisheries has been made, with scallop dredging vessels now required by law to operate a Remote Electronic Monitoring (REM) system. However, concerns remain over the delays to the roll out of the programme across the fleet, originally promised in 2019.

LINK welcomed the closure of the sandeel fishery in Scottish waters in 2024. However, little progress has been made on wider spatial management for fishing. LINK members have long called for a new spatial management regime for fishing, which needs to include an inshore low-impact zone comprising No-Take Zones, static-gear only zones, low-impact mobile-gear only zones (but only where this can be demonstrated) and areas for nature conservation.

## **Aquaculture**

LINK members welcomed the Scottish Government Vision for Sustainable Aquaculture in 2023, which contains bold and long-overdue commitments, but progress to date on implementing the outcome has been limited. Notable milestones include:

- a new regulatory framework in 2019, with 73% of farm licences have been moved across to the new framework
- Sea Lice Risk Assessment Framework (SLRAF) introduced in February 2024 and expanded to include sea trout interactions in March 2025. However, currently over 200 fish farms are appealing against the required licence variations.
- In January 2025, the Rural Affairs and Islands (RAI) Committee published their report on progress since 2018 on salmon farming regulation, raising strong concerns over the lack of implementation so far, and the slow progress being made by the Scottish Government.

#### 4. Invest for our future: 1 of 3 asks in good progress.

The launch of Scottish Marine Environment Enhancement fund (SMEEF) in 2022 was a very welcome step to support and drive an increase in practical conservation projects. However, recent public budget cuts to nature conservation are deeply concerning. The Scottish government should continue to significantly increase the overall level of public investment in nature and, importantly, ensure that existing funding is used more effectively by ending subsidies for activities which degrade biodiversity.

#### Conclusion

As we have now entered 2025, we find ourselves at the midpoint of two major United Nations Decades: *Ocean Science for Sustainable Development* and *Ecosystem Restoration*. Despite these international commitments and evidence showing continuing ecological decline, the 2025–26 Programme for Government omitted long-anticipated legal and policy commitments to safeguard our marine environment, including on MPAs. This is a concerning oversight that could have serious implications for the health of Scotland's seas. Looking ahead to 2025–2030, closing implementation gaps and accelerating progress is vital if Scotland is to safeguard its marine ecosystems and the benefits on which society depends.

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.

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