



## National Nature Reserves and 30x30

### LINK Position Briefing

April 2025

#### Summary

- Scottish Environment LINK supports the inclusion of National Nature Reserves (NNRs) in Scotland's 30x30 target only where they meet internationally recognised standards for protected areas.
- NNRs without statutory underpinning should not be automatically included and require review by the NNR Partnership Group through a revised NNR framework that aligns with IUCN criteria.
- An approach based on robust criteria is needed to ensure 30x30 delivers lasting outcomes for nature.

#### Background

Scotland's 30x30 target, the commitment to protect 30% of land and sea for nature by 2030, forms a central part of the Scottish Biodiversity Strategy and Delivery Plan. This is aligned with the UN Convention on Biological Diversity (CBD) and the IUCN Protected Area targets.

NatureScot has confirmed that five types of designations are currently being considered as contributing to the terrestrial element of 30 by 30:

- Sites of Special Scientific Interest (SSSIs)
- Special Protection Areas (SPAs)
- Special Areas of Conservation (SACs)
- Ramsar sites
- National Nature Reserves (NNRs)

In addition, Other Effective area-based Conservation Measures (OECMs) are being developed to recognise non-designated areas that deliver biodiversity outcomes.

While SSSIs, European sites and Ramsar are statutory designations, the automatic inclusion of all NNRs, some of which lack legal underpinning, has raised concerns. This is not a question of the quality or contribution of NNRs to nature's recovery, but of the principle of the statutory protection they offer and the overall integrity of the 30x30 target.

#### NNRs in Scotland

There are [43 National Nature Reserves in Scotland](#) covering approximately 2% of the land area. Around 80% of NNRs overlap with SSSIs, SPAs, or SACs and would therefore already be included within the 30x30 figure if only statutory designations were counted.

The remaining 20% (roughly 0.4% of Scotland's land area) are not underpinned by legal protection, relying instead on voluntary management agreements. These sites have contributed significantly to nature restoration and public engagement, and the NNR network has often delivered some of Scotland's best examples of collaborative land stewardship. However, voluntary approaches lack legal durability, and relying on them without scrutiny risks undermining the international credibility of the 30x30 commitment which requires *protection* in addition to effective management.

LINK recognises the strength of the NNR model and recommends that, where statutory designation is not appropriate, the NNR framework itself be strengthened and aligned more closely with IUCN criteria. This offers an alternative to assurance through separate OECM recognition.

### LINK's Position on NNR Inclusion in 30x30

LINK supports the inclusion of NNRs only where they meet internationally recognised standards for protected areas, specifically those set by the [IUCN](#) and the [Convention of Biological Diversity](#). This includes:

- A clear legal or long-term commitment to conservation
- Effective governance and management systems

To balance these principles with the practical strengths of the NNR network, LINK proposes the following approach:

	Designation Type	LINK Position
1	SSSIs, SACs, SPAs, Ramsar Sites	All should be counted towards 30x30 when well managed and in good or recovering condition.
2	NNRs (with statutory underpinning)	Include only if underpinned by SSSI, SAC, or SPA designation and meet robust management criteria. Must also be well managed and in good or recovering condition.
3	NNRs (without statutory underpinning)	Should not be automatically included. Require review by the NNR Partnership Group and, where appropriate, strengthening through a revised NNR framework that aligns with IUCN criteria.
4	OECMs	Where OECMs are recognised in line with IUCN criteria, they can count towards 30x30. Although voluntary, IUCN standards require long-term commitment, biodiversity outcomes, and durable governance. In theory, OECMs should be as effective as protected areas.
5	Sites meeting SAC/SPA criteria but not designated	Should be considered for designation and then inclusion.

LINK proposes that only NNRs underpinned by protected area designations should automatically count towards 30x30. For NNRs without such underpinning, LINK recommends that the NNR Partnership Group,

representing land managers and conservation interests, review site selection and monitoring standards to ensure they meet IUCN criteria for effective protection.

There may be other high-value sites, including within the existing NNR network, that are currently undesignated but merit SSSI or OECM status. Designation or OECM accreditation of these sites should be prioritised and then counted 30x30. A review of NNRs currently lacking statutory designation presents an opportunity to strengthen the network through targeted action.

## Recommendations

### Introduce a criteria-based assessment for NNR inclusion

Develop a transparent framework to assess each NNR on:

- Statutory underpinning
- Conservation objectives and delivery
- Management quality and governance
- Biodiversity condition and outcomes
- Monitoring and evaluation of outcomes

Regular monitoring should be an integral part of this framework, either as a standalone criterion or within governance, recognising that we cannot know whether sites are effectively protected (regardless of whether they are designated as protected areas or OECMs) without consistent, outcome-focused assessment.

NNRs should be reviewed on a 10-year cycle to ensure continued eligibility.

### Strengthen the NNR framework

Review and update the NNR selection and monitoring criteria to ensure they meet IUCN standards, avoiding duplication via OECMs.

### Encourage statutory underpinning of NNRs

Provide policy support and resourcing to underpin standalone NNRs with SSSI designation.

### Clarify distinction between PAs and OECMs

Avoid presenting OECMs as interchangeable with PAs and instead use them strategically to fill gaps in the 30x30 network, particularly on private, community, and eNGO-managed land where statutory designation is not yet viable.

OECM recognition should only be applied where there is effective protection, management, and governance, as confirmed by NatureScot against national OECM criteria and evidenced by regular monitoring of biodiversity outcomes. This ensures that OECMs contribute meaningfully to conservation targets rather than acting as a substitute for formal protection.

## Conclusion

LINK supports a 30x30 approach that ensures meaningful and enduring protection for nature, not simply drawing lines on a map. NNRs play an important role in Scotland's conservation landscape and, in principle, are compatible with IUCN protected area categories. However, their inclusion in the 30x30 network should not be automatic.

While many NNRs already meet the IUCN criteria, this must be demonstrated on a site-by-site basis, ensuring that each has clear conservation objectives, legal protection (such as domestic SSSI designation), effective management, and outcomes monitoring in place. The variability in statutory underpinning across the UK makes this assessment especially important in delivering a credible and internationally recognised 30x30 commitment.

Strengthening the existing NNR model offers a collaborative path to ensure all sites fully meet protected area standards without defaulting to OECM accreditation as a workaround. To maintain Scotland's leadership on biodiversity, our commitments must be backed by legal protection, effective management, adequate funding, and transparent monitoring.

The briefing is supported by:

National Trust for Scotland

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British Dragonfly Society

Butterfly Conservation Scotland

Bumblebee Conservation Trust

Scottish Wild Beaver Group

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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