



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 the necessary legal protection and management should not be automatically included in the protected area network.
- LINK proposes a tiered approach to categorising land within the 30x30 target to ensure the network remains robust and focused on delivering meaningful ecological outcomes.

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 30%:

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

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

While SSSIs and European sites are statutory designations, the inclusion of NNRs, some of which lack legal underpinning, has generated concern.

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 statutory designations alone were counted.

The remaining 20% of NNRs (0.4% of Scotland's land area) are not underpinned by statutory protection and may only qualify based on voluntary management agreements.

LINK's Position on NNR Inclusion in 30x30

LINK supports the inclusion of NNRs within the 30x30 target only where they meet internationally recognised standards for protected areas, which requires a clear legal basis and effective long-term management. NNRs that do not meet these conditions should not be automatically included.

We propose a tiered approach to ensure the 30x30 network remains focused on delivering positive ecological outcomes.

	Designation Type	LINK Position
1	SSSIs, SACs, SPAs, Ramsar Sites	All should be automatically included as Protected Areas under 30x30.
2	NNRs (with statutory underpinning)	Include only if underpinned by SSSI, SAC, or SPA designation and meet robust management criteria.
3	NNRs (without statutory underpinning)	Should not be automatically included. Require review and possible upgrade via SSSI or OECM status.
4	OECMs	These should be kept separate due to their voluntary nature and lack of legal underpinning. However, they should be used to fill gaps in nature networks and for sites that have the potential for biodiversity management.
5	Sites meeting SAC/SPA criteria but not designated	Should be considered for designation and then inclusion.

The [IUCN definition of Protected Areas](#) and the [Convention of Biological Diversity's guidance for 30x30](#) require sites to have:

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

Including NNRs without legal protection risks undermining Scotland's international 30x30 commitments by simply drawing lines on a map without ensuring meaningful protection for nature.

Including all 43 NNRs without scrutiny would inflate Scotland's 30% figure by 0.4%, relying on sites that may not have durable protection or effective management in place. NNRs have shown variable outcomes depending on resourcing, landowner interest, and partner capacity. The restructuring of Caenlochan NNR in 2005, when areas such as Corrie Fee and Cairnlochan lost their designation, illustrates that, without statutory protection, management breakdowns can lead to the loss of status, even where sites remain important for biodiversity.

NNRs are often designated voluntarily by eNGOs, public bodies, or landowners. While this can be a strength in stakeholder engagement, voluntary approaches alone lack enforceability and permanence. Voluntary designations should be supported by statutory designation (SSSI) or robust OECM recognition to ensure durability.

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

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

Encourage statutory underpinning of NNRs

Provide policy support and resourcing to underpin standalone NNRs with SSSI designation. Where appropriate, promote OECM designation as an interim step, with pathway to full legal protection.

Clarify distinction between PAs and OECMs

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

Conclusion

LINK supports a 30x30 target that goes beyond simply drawing lines on a map to ensure that land is genuinely and effectively protected for nature. It is essential that areas designated for protection are not only counted towards the target but also have the necessary management and monitoring frameworks in place to deliver meaningful ecological outcomes. NNRs play an important role in Scotland's conservation landscape, but they must not be automatically included in the protected area network unless they meet internationally recognised criteria for protected areas.

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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