

[Draft Environment Strategy consultation](#)

Closes: 29 September 2025

This briefing summarises key points that are currently being discussed in LINK Groups and which form the basis of a LINK response to the consultation. The purpose of this briefing is to help workshop participants participate on behalf of the environment to the draft strategy and gives the context and conditions needed for success in terms of long term and effective environmental sustainability.

What should the Environment Strategy do?

This draft Environment Strategy has been positioned as the place to bring together key policy and legislation that is required to meet Scottish Government ambitions including the climate and forthcoming nature targets. It is also where gaps in action and plans become clear and where overall progress towards tackling the key drivers behind climate change, nature loss and pollution can and should be tracked and monitored. In order to meet Scottish Government ambition around leadership on climate, biodiversity and agriculture, as reflected in public statements, it will be necessary to tackle systematically the main drivers behind the issues of biodiversity loss, climate change and pollution. It is not clear that the strategy as drafted will be able to do this.

The rhetoric from Government around the need to tackle both the nature and climate crisis is consistent: nature positive is set alongside Net Zero, which is a positive acknowledgement of the need to act for both. However, while the rhetoric is there and the understanding of the threat is there, implementation remains very weak.

Can this, as drafted, deliver?

This is a key flaw with the strategy as drafted. While it is limited to 'drawing together' existing policies and strategies, it fails to accept that those are not working, despite missed targets etc, and does no analysis of why or what is needed. This analysis is urgently needed and should be a key part of this strategy: an analysis of why these policies are not working will identify where action, and focus should be, driven by this strategy. This will relate to drivers of loss and the absence of ecological resilience, but will also include more action on agriculture reform, on INNS, funding for nature recovery, etc. Such a gap analysis will also highlight issues with access to justice, including Aarhus non-compliance for example.

Environment needs:

Workshop questions:

- (a) Do you agree with the 'priorities for delivery' that the strategy sets out for achieving the society, economy and global impact outcomes? Are there gaps?
- (b) Are there opportunities to strengthen delivery in these areas, going beyond what is set out in the pathways for these outcomes?
- (c) How can we increase the acceptability of the proposals, individually and cumulatively, with the public and businesses?

The logic model adopted here accepts that Scotland is operating outside planetary boundaries. Stresses on the environment are having material negative effects on human health and ecosystem resilience. However, **ecosystem resilience and the necessary actions to build it, are missing**. The logic model goes straight from impacts, in terms of increased temperature and storminess for example, to impacts on humans with no consideration of impacts on nature and mitigating those. Operating outside planetary boundaries is clearly unsustainable and means we need urgently to redesign how we use land and sea, a key driver of loss. The

changes this requires is where impacts on human health and ecosystem resilience will be delivered. This strategy provides the opportunity to identify and plan such actions but the opportunity is not taken.

Instead, this strategy appears to be designed to capture a wealth of opportunities in transitioning to green economy and sustainable lifestyles leading to greater prosperity and wellbeing for humans only. There is very little about limiting and fixing damage to our ecosystems and natural capital. This parallels the focus adopted in Green Industrial Strategy, which is similarly not based on delivering sustainable ecosystems and is therefore not able to do so. Nature is missing there too.

The logic model approach adopted here needs to start instead from where the vision needs to end up, not from where we currently are. That way, ecosystem resilience is built in from the start. For example, nature networks are missing but are a fundamental part of building natural resilience to change. The reliance on the Scottish Biodiversity Framework and Delivery Plan to deliver is overstated - they are too limited in scope to be able to deliver at the scale required. They only cover Scottish Government led action, they do not include wider society and they are not statutory: they are powerless to require change. This has been the limitation of all biodiversity strategies and supporting strategies since the first one in 2004 and is why too little progress has been made to date.

Economics needs:

Workshop questions:

1. Do you agree with the 'priorities for delivery' for achieving the outcome: 'Scotland's net zero, nature positive and circular economy thrives within the planet's sustainable limits'? Are there gaps? Are there opportunities to strengthen delivery in these areas?
2. What are the most promising economic, business and investment opportunities in transitioning to a net zero, nature-positive, circular economy? How can these be best captured?
3. What are the risks and potential unintended consequences for businesses that we need to be aware of, and how can we work with business and investment stakeholders to co-design the transition?

Opportunities are being missed (eg around Biodiversity Enhancement), which will result in increasing future costs. This is because costs of inaction are significant.

The heavy reliance on the Green Industrial Strategy, which is nature blind, is a huge risk to achieving effective action for environmental sustainability. Finally, action on marine issues is weak. It focuses on future strategies (National Marine Plan 2) except for blue economy vision and UK Marine Plan, both of which remain very much siloed.

Proposals:

This Strategy must outline what the action to address the risks are and work out where they sit in current strategies and which are missing. It must then set out how to fill them. The risk with the approach in this draft is that a very strong impression is given that Scotland is doing more and better than we are as a country and when things don't change, disillusionment sets in.

A gap analysis of policy and legislation in place or shortly forthcoming illustrates some implementation gaps, notably around habitat connectivity. LINK will be providing examples.

It is imperative that the core of an effective environment strategy must be to tackle the drivers of biodiversity loss and reverse them. Without a healthy, fully functioning environment, all other costs increase, be that material costs or well being and quality of life costs.

Engaging people: what is the role of wider society?

Workshop questions:

Need to find them!

Without tackling the fundamental issues around declining environmental quality and ecosystem function, asking people to make lifestyle and behavioural changes shifts the focus onto indirect action and holds 2 significant risks:

- (a) People will make life style changes that could cost them more or be more inconvenient while simultaneously continuing to watch biodiversity decline and their local environment become much less resilient to climate change and impacted by flooding, wildfire, increased ill health / disease and imbalanced natural systems, including fewer pollinators, increased ticks. This will lead to public disillusionment with Government strategy, which requires them to make sacrifices but continues to support wider scale action that continue to deplete Scotland's natural capital and wildlife.
- (b) If Government is unable to lead the kind of scale of changes that are required to address the drivers of biodiversity loss, dissatisfaction with Government will set in. It is a risky strategy to put the emphasis on behavioural change without tackling the bigger drivers of loss like land and sea management.

Connecting people to nature and creating nature rich towns and cities are important actions: but the success of an Environment Strategy will only be measured in the impact it has the drivers of biodiversity loss, climate change and pollution. Countering those requires leadership and policy decision making at Government level, not just as societal level.

Conclusion

While the proposed vision and outcomes are appropriate, relying on actions in identified strategies and policies cannot deliver them. A poor legacy and public disillusionment is a significant risk.

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25 August 2025

LINK members: please input into the draft strategy consultation response [here](#) by 19 September.