



Scotland Environment Strategy consultation response 29 September 2025

Introduction to Scottish Environment LINK

Scottish Environment LINK is the forum for Scotland's voluntary environment community, with 50 member bodies representing a broad spectrum of environmental interests with the common goal of contributing to a more environmentally sustainable society.

Its member bodies represent a wide community of environmental interest, sharing the common goal of contributing to a more sustainable society. LINK provides a forum for these organisations, enabling informed debate, assisting co-operation within the voluntary sector, and acting as a strong voice for the environment. Acting at local, national and international levels, LINK aims to ensure that the environmental community participates in the development of policy and legislation affecting Scotland.

LINK works mainly through groups of members working together on topics of mutual interest, exploring the issues and developing advocacy to promote sustainable development, respecting environmental limits. This consultation response was coordinated through LINK's Governance Group.

1. Response

Vision and outcomes

Question 1: Do you agree with the vision of the Environment Strategy?

This draft Environment Strategy brings together key policy and legislation that is required to meet the Scottish Government's ambitions and 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.

Government's rhetoric around the need to tackle both the nature and climate crisis is both welcome and 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 and follow through into all policy areas is poor. The result is insufficient action to address the scale and speed of nature and climate risks across Government. The Environment Strategy as drafted, is as yet unable to identify the gaps and point to action necessary to fill them. The actions are too underdeveloped and incomplete. The ongoing review of the National Performance Framework is an example of potential backsliding on monitoring and retaining a focus on environmental actions.

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 yet working sufficiently well and does no analysis of why or what is needed. This 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. 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 and access to justice, including Aarhus non-compliance for example. This Strategy then has a key role in setting the direction of travel, filling key gaps and driving progress forward.

One example is the treatment of freshwater systems: for freshwater the draft strategy really only highlights water pollution and refers back to RBMP3 which, as we know, has largely been ineffective due to its lack of ambition. This strategy should set out the level of ambition required so that when SEPA start drafting the next RBMP they have something to aim for. LINK will be publishing a report on this shortly.

This Strategy must outline what the actions 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. 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, support for changes in rural land use, River Basin Management Plan delivery, national and regional marine planning, access to justice and Aarhus compliance, National Performance Framework review for example.

In summary: The vision and outcomes are appropriate but actions through identified strategies and policies cannot deliver them. Opportunities are being missed (e.g. around Biodiversity Enhancement), which will result in increasing future costs. This is because costs of inaction are significant. A poor legacy and public disillusionment is a significant risk. Some of these linked strategies and plans referred to in the Priorities table are still being written, e.g. the Circular Economy Strategy. How will this Environment Strategy will ensure that these will be up to the job of delivering the overall vision? And what needs to be done to the existing strategy documents, referenced in this draft, in order to fill the gaps in delivery?

Question 2: Are there any outcomes that you feel should be removed, added or changed in the Environment Strategy?

Invasive non-native species are mentioned as one of the key drivers identified in the 2022 Global Biodiversity Framework and yet there is nothing else in the strategy in terms of objectives, policies and deliverables.

Outcome pathways

Question 3: There now follow questions about the individual outcome pathways. Do you think that the outcome pathways considered together include the important policies, actions and future priorities to achieve the Vision? If not, what changes would you suggest?

No.

The logic model adopted in this draft strategy accepts that Scotland is operating outside planetary boundaries. Stresses on the environment are having material negative effects on human health and resilience to change. However, there is a vital missing component that requires much closer focus: ecosystem resilience. The logic model goes straight from the crisis impacts to impacts on humans, missing out impacts on nature and mitigating those. Operating outside planetary boundaries means we need to redesign how we use land and sea and the changes this requires is where impacts on human health and resilience will be delivered. This strategy provides the opportunity to do that but the opportunity is not taken in this draft.



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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 but without investing in resilient ecosystems. There is nothing about limiting and fixing damage to Scotland's ecosystems, without which the green economy and sustainable lifestyles cannot happen. 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 does not start from where the vision needs to end up, which is with resilient fully functioning ecosystems and operating within planetary boundaries. This is a fundamental flaw. Instead, the strategy must start with rebuilding ecosystem resilience in order for our economic, social and cultural systems to thrive.

For example, nature networks are fundamental but are missing: the heavy reliance on the Scottish Biodiversity Framework and Delivery Plan is clear but these are too limited in scope because they only include Scottish Government led action, not wider society, and they are not statutory. Scotland's Biodiversity Strategies since 2004 have shown that with no statutory basis, delivery is not prioritised and outcomes are mixed at best. They cannot deliver at the scale required – it needs a whole of Government and society approach, which is where the Environment Strategy should be stepping in.

The heavy reliance on the Green Industrial Strategy is concerning, because it is nature blind. The risks are significant in implementing any nature blind strategy. See answer to Question 10.

A third example is around action on marine issues: this is weak. It focuses on future strategies (National Marine Plan 2) except for blue economy vision and UK Marine Strategy and remains very much siloed. We need to be taking a more holistic approach to the water environment. Issues such as plastic, nutrient, and chemical pollution in the marine environment often start in freshwaters but this strategy silos the two. On plastic pollution it focuses on the Marine Litter Strategy to prevent plastics entering the marine environment and doesn't acknowledge the source of the litter may be elsewhere. The Source to Sea approach must be embedded in this strategy as a guiding principle.

Outcomes on biodiversity, climate change and pollution

Question 4: The pathways for the outcomes on biodiversity, climate change and pollution signpost to existing policies – how can we best address potential synergies and trade-offs across these outcomes? For example, how can we reduce greenhouse gas emissions in a way that also helps to restore biodiversity and minimise pollution?

By signposting to existing policies, this strategy is signposting to policies that have so far failed to deliver the outcomes hoped for (see missed targets, lack of progress, etc). The pathways must recognise where current failures lie and address those failings through requiring new or improved policies. It needs to be clearer which will be delivered by existing policies and strategies, which will link across strategies or indeed require development of new policies.

While the draft Environment Strategy addresses pollution, climate change, and biodiversity loss, it has failed to explicitly recognise light pollution as an active environmental pollutant, despite its growing impact across Scotland's urban, rural and coastal areas. Scientific evidence has increasingly recognised Artificial light at Night (ALAN) as a pollutant that disrupts biological processes, from gene expression to ecosystem functioning. It interferes with circadian rhythms, pollination, predator-prey interactions and species migration. Unnecessary lighting also contributes to energy waste and carbon emissions. The Strategy states that outcome pathways will



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align with existing and upcoming policies. However, there are currently no policies in Scotland or the UK that directly addresses light pollution, creating a loophole that risks excluding Light Pollution from future environmental action. Light pollution needs to be recognised, regulated and reduced. LP reduction targets should be incorporated into national planning guidelines to protect nocturnal environment while meeting societal needs.

The Section 3.3.2 on water pollution seems to be not linked up and should be considered alongside the River Basin Management Plan, the Biodiversity Framework, and related strategies such as the Land Use Strategy. Addressing rivers in isolation limits the ability to fully assess environmental pressures. There is no reference to invasive non-native species in this section.

Question 5: What are the top priorities the Scottish Government should focus on to improve the environmental impact of Scotland’s activities on other countries? – For example, this could include the impacts of producing the goods and services we import into Scotland, our exports of waste and our approach to international engagement.

See answer to Question 6.

Question 6: Do you have any further views on how the pathway outlined in the draft Strategy can help achieve the outcome “Scotland’s global environmental impact is sustainable”?

Circular economy: The EPR is not mentioned in this strategy and is surely one of the most effective ways that a circular economy can be delivered. There should also be an acknowledgement of the polluter pays principle and how this will impact decision making. What are the levers that this document has to ensure that a Circular Economy Strategy is delivered that is up to the task of delivering the ambitions of the vision of this document?

International collaboration: Scotland has a role on the global stage and is recognised for its international leadership and reputation: eg Under2 Coalition co-chair plus Edinburgh Declaration and Commitment on policy coherence for sustainable development. These levers for transformation could be used to much greater effect through reference and tying into wider actions outlined in this strategy.

Question 7: To what extent do you agree/disagree that societal changes, including in our lifestyles and behaviours, are needed to help tackle the nature, climate and pollution crises?

Or, if you disagree, please explain in the text box below why you don’t think that societal changes, including in our lifestyles and behaviours, are needed to help tackle the nature, climate and pollution crises.

Connecting people to nature is vital if Scotland is to improve people's lives today and into the future. Stronger connections to nature build greater support for some of the difficult decisions that are required around resource allocation and action prioritisation. However, these connections need to be nurtured across urban and rural Scotland.

More importantly, it is vital that we deal with systemic issues that drive environmental damage, rather than just relying on lifestyle and behaviour change. The approach outlined here puts the onus back on people and tackles the easiest issues. While this is good to do, there are bigger, more complex decisions and prioritisations that are required in order to scale and speed up action to move towards sustainable living within planetary boundaries. There is no life on a dead planet.



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Creating nature rich towns and cities: The exclusive focus on urban areas is concerning and misses significant opportunities for large scale, impactful action for nature and climate across Scotland. This solves one problem but doesn't contribute to reversing loss. Both are needed.

Access to a healthy environment:

The 20-minute neighbourhood model, central to Scotland's National Planning Framework 4, promotes local living and has potential benefits for biodiversity, wellbeing, and climate resilience through improved access to green spaces, sustainable transport, and digital connectivity. Its potential is not being realised, and the concept is in danger of being undermined. The Environment Strategy could help embed action towards the 20 minute neighbourhood outcomes more clearly and give them more weight.

Climate and nature were key threads throughout NPF4 but are being sidelined. Biodiversity enhancement is not being consistently delivered on the ground and is an enormous lost opportunity if not implemented in full and quickly as opportunities are in danger of being lost. See answer to Question 10.

Empowering people to live well - food:

Food production clearly has the potential to contribute significantly to delivery of this strategy. However current approaches, with the significant proviso clause, included in this draft, which omits to place domestic food production in a healthy and productive environment, holds back the potential.

This has to change: long term domestic food production in Scotland must be sustainable, which means it must take place in an ecologically healthy environment. This clause about unintended consequences implies that we have an either / or choice between domestic food production or a healthy environment: this is extremely unhelpful. Failing to support domestic food producers to move towards nature and climate friendly practices causes longer term damage not just to the environment but to rural businesses and communities too.

Question 8: Do you have any further views on how the pathway outlined in the draft Strategy can help achieve the outcome "Scotland's society is transformed for the better by living sustainably, in harmony with nature"?

See answer to Question 7.

Question 9: To what extent do you agree/disagree that a just transition to a net zero, nature positive, circular economy is needed to support Scotland's role in tackling the nature, climate and pollution crises?

If you agree, please explain in the text box below how you think the Scottish Government could most effectively support this transition in ways that create wider economic opportunities for Scotland, including for jobs and businesses.

Or, if you disagree, please explain in the text box below why you don't think a just transition to a net zero, nature positive, circular economy is needed to support Scotland's role in tackling the nature, climate and pollution crises.

See answer to question 12.

Question 10: Do you have any further views on how the pathway outlined in the draft Strategy can help achieve the outcome "Scotland's net zero, nature positive and circular economy thrives within the planet's sustainable limits"?

The Green Industrial Strategy features strongly. However, this strategy, as published, is unable to deliver for the planet or therefore long term prosperity. It is all about decarbonisation and low carbon industry, with nothing



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on nature, ecosystems and limiting negative impacts. The Environment Strategy is a clear opportunity to fill that gap but the current draft does not yet do that.

Designing Scotland's energy system to protect and restore nature: Infrastructure: there is a mismatch in timescale and deliverables on NPF4: despite strong Policy 3b, delivery is not matched by available support and many opportunities are currently being missed. The provision of advice and tools, including Biodiversity Enhancement is urgently required so infrastructure development can contribute to nature crisis as well as climate. We welcome the statement that, "Our Fourth National Planning Framework (NPF4) strategy and policies support development that helps to secure positive effects for biodiversity, including for onshore energy development". However, in reality there seems to be resistance from the Energy Consents Unit of Scottish Government to support the delivery of biodiversity enhancement or give proper consideration to Policy 3 and Policy 4. There is huge potential for the renewables sector to contribute to biodiversity enhancement and a willingness to do so from the sector. However, this seems to be is being frustrated by decision makers in the ECU.

Building regenerative and resilient land and marine based industries: The role of policies designed to guide and implement change across Scotland on land and at sea including the Land Use Strategy and National Marine Plan 2 are not referenced here yet their potential could be significant. They both need to deliver significantly if this strategy is to meet its vision. Including them and outlining their aims in relation to this strategy would be helpful.

Unlocking high integrity public and private finance: Investment is required to support the scale of action required to meet climate and nature obligations. This strategy limits itself to reaching NZ and to 'green' investment. Nature investment is left to the Biodiversity Investment Plan and Natural Capital Market Framework, which are too weak to be able to deliver at the scale required. This is a missed opportunity to tie nature and climate investment together to ensure that all investment delivers aligned outcomes and moves away from supporting conflicting outcomes in nature loss or increased emissions. The role and impact of SNIB is another missed opportunity. SNIB investments are not fit for purpose on nature. A commitment to improve its remit would help plug this gap.

Question 11: Do you agree/disagree with the approach set out in the pathway for the outcome "We build Scotland's resilience to climate change and other global environmental risks"?

See answer to Question 12.

Question 12: Do you agree/disagree with the approach set out in the pathway for the outcome "These transformations are achieved through a just transition and support climate and environmental justice"?

The Just Transition transformations are overstated given that they are only embedded in the natural capital market framework and Scottish Biodiversity Strategy Delivery Plan (page 53). There is a lot of work to be done here and no clearly articulated way of doing it here. This is a missed opportunity to reference the sector Just Transition Plans and to ensure that together they are able to deliver a Just Transition to Net Zero and nature positive in those sectors, through a gap analysis. There remain, of course other sectors with no clear plans, including marine.

Climate and environmental justice:

In order to deliver on climate and environmental justice, an enforceable Human Right at a Healthy Environment is required which includes both the six substantive features of clean air, safe climate, safe and sufficient water, healthy and sustainable food, non-toxic environments, and healthy ecosystems and biodiversity; and procedural rights which are fully compliant with the Aarhus Convention on access to information, public participation in decision-making and access to justice in environmental matters. There must be a clear commitment from the



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Scottish Government to address its long-standing breach of the Aarhus Convention. LINK has also long advocated for a dedicated Scottish Environment Court to improve access to justice and enhance environmental governance in Scotland.

This response was compiled on behalf of LINK Governance Group and is supported by:

Woodland Trust Scotland

Nature Foundation

Scottish Raptor Study Group

Scottish Wild Land Group

The Froglife Trust

North East Mountain Trust

RSPB Scotland

Association of Environmental Clerks of Works
(AEnvCoW)

Buglife

Scottish Wildlife Trust

Fidra

Environmental Rights Centre for Scotland

Marine Conservation Society

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