Scottish Environment LINK

Marine and Coastal Restoration Plan

October 2035

Introduction to Scottish Environment LINK

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.

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 written by LINK's Marine Group.

1. **Response**

<u>Restoration opportunities and Priorities</u>

1. **On a scale from 1 to 5, how would you prioritise each of the objectives in this theme?**

1 the objective is not at all important
2 the objective is not very important.
3 neutral
4 the objective is quite important
5 the objective is very important
0 I am unsure

- Establish a rolling programme of opportunity maps - 4
- Develop criteria for priority habitats and species - 4
- Support and enable landscape scale restoration- 4
- Promote the importance of a place-based approach and baseline surveys - 4

2. **Please choose for each action in this theme whether it should be: included in this plan, reserved for the future, or not included (can also select unsure)**

- Develop opportunity maps for habitats and species, taking into account restoration priorities - included in this plan

- Gather and incorporate further data to refine opportunity maps and develop new layers - included in this plan
- Explore appetite for more localised and/or regional opportunity maps - included in this plan
- Set out priorities at national scale, while supporting regional partnerships and other local coalitions to identify regional priorities- included in this plan
- Review and update priorities using the criteria once established to ensure action is targeted where it is most urgently needed included in this plan
- Improve understanding of connections between habitats and species to generate ecosystem level benefits- included in this plan
- Encourage landscape scale funding - included in this plan
- Enable join up between projects - included in this plan

3. **Is there any further information you would like to share with us on the objectives or actions in this theme? This could include your reasons for selecting the answers to the previous two questions, or any further reflections on the overall content of the theme**.

LINK members would recommend that community groups should be involved in the mapping work as there has been some progress on this already. For example the Community Led Marine Management Roundtable run by the Coastal Communities Network, Fauna & Flora and Esmee Fairbairn Foundation discussed at a recent meeting in June mapping current or planned activities in Scotland. The Protected Areas Foundation is also currently mapping designated sites across the UK along with the community groups working in that area. There is a need for a similar tool to the NMPi interactive map that would allow easy access to information about marine activities. Any mapping platform developed should be intuitive and accessible to non-specialists.

We also welcome the acknowledgement of the importance of ecosystem-level restoration, which recognises the interconnectedness of habitats and species, as well as the focus on the unique and important role of communities in driving restoration efforts. We agree that the plan should avoid being too prescriptive in terms of geographical scope or historical limitations in order to maximise potential restoration benefits. We welcome the fact that the plan prioritises habitat creation and species reintroduction, which can directly address biodiversity loss and climate resilience.

While active restoration is emphasised, we feel that the plan downplays the role of passive restoration (e.g., reducing human pressures), and how that interacts with restoration projects. We would recommend expanding the focus on pressure management to complement active restoration efforts. For example the No-Take Zone in Arran has provided evidence of nature restoration following the closure

of an area around Lamlash Bay[1]. The closure of certain fisheries, such as the recent sandeel fisheries closures, also represent options for passive restoration.

Regulatory Environment

4. **On a scale from 1 to 5, how would you prioritise each of the objectives in this theme?**

1 the objective is not at all important
2 the objective is not very important
3 neutral
4 the objective is quite important
5 the objective is very important
0 I am unsure

- Support restoration projects navigating the regulatory environment - 4
- Encourage better join up, transparency and information sharing across regulators and public bodies - 4
- Establish protection mechanisms for habitats and species undergoing restoration – 4

5. **Please choose for each action in this theme whether it should be: included in this plan, reserved for the future, or not included (or unsure).**

- Identify opportunities to create and fund a support post(s) to help projects navigate regulatory requirements - included in this plan
- Update and produce further guidance on regulatory requirements, including mapping what is needed and when - included in this plan
- Create a one stop shop for guidance, information and knowledge exchange, including a database of projects to improve oversight of where restoration is happening
- Set up a forum for relevant bodies to share regular updates - included in this plan
- Invite local authorities to information workshops to raise awareness of restoration - included in this plan
- Work with regulatory bodies to ensure support for restoration is a key priority - included in this plan
- Explore how best to implement a protection mechanism, in law, for habitats and species undergoing restoration
- Set out clear monitoring requirements as well as procedures for cases where restoration is not successful

[1] https://www.arrancoast.com/wp-content/uploads/2020/02/Arran-Success-Paper-February-2020.pdf

- Encourage early engagement with local communities and other sea users to consider voluntary arrangements, for example codes of conduct - included in this plan
- Include policies in NMP2 to support active restoration

6. Is there any further information you would like to share with us on the objectives or actions in this theme?

We believe there is a missed opportunity here to address a key barrier to restoration work: The licensing process. LINK members think the government should prioritise improving the regulatory system rather than trying to address this solely through employing additional staff to deal with its deficiencies in supporting restoration work. Alongside regulatory reform, we support the proposal of a dedicated post in a marine facilitator role and a one stop shop as a centralised resource. It will also be important for the person in post to have an understanding of the local context and scale in different areas, linking with local leaders and other key stakeholders who may not live in the immediate vicinity, for example. Consideration should be given to locating additional staff capacity in regional/coastal locations. There may also be a role for local marine rangers in terms of monitoring and providing local support to the one-stop-shop approach.

It will also be vitally important to consider ownership of restoration sites and what rights communities have, potentially including statutory protections for previously restored sites and special enforcement powers, which would also require funding. Crown Estate Scotland, who owns much of the seabed, should be a key player in marine and coastal restoration, as they already are through SMEEF.

While support posts and guidance are proposed, LINK members would question if this will be enough to help simplify the process, or if it will remain a barrier for smaller community-led projects. Information on processes and mechanisms need to be readily accessible and available with more training opportunities for communities, on both technical management issues (eg. monitoring) and social/capacity building (eg outreach).

It is important that protection mechanisms are implemented urgently to ensure that the significant investment in restoration activities is not lost. Alongside this consideration should be given to the ability to enforce infringements and also the scale of the fines needed to deter illegal activity especially given the market value of some restored species, e.g. native oysters.

Monitoring is a key component of restoration and to date the majority of restoration projects have been building this into their programmes due to the importance of understanding impacts and testing methods. However, the requirement to monitor should not be placed solely at the expense of restoration projects that are often funded through philanthropic funds and more consideration should be given to the role of Statutory bodies in providing ongoing monitoring of species and habitats and impacts of

restoration activities, especially since these activities are intended to help meet the nature restoration objectives of statutory bodies. Restoration Projects will continue to monitor the target species but wider ecosystem monitoring should not be a requirement, as it is not for other industries such as commercial fisheries.

Funding and Finance

7. **On a scale from 1 to 5, how would you prioritise each of the objectives in this theme?**

1 the objective is not at all important
2 the objective is not very important
3 neutral
4 the objective is quite important
5 the objective is very important
0 I am unsure

- Address the funding gap for project development and groundwork phases - 4
- Continue investment in pipeline of projects - 4
- Ensure private sector investment can support restoration at scale but does not bypass local communities - 4

8. **Please choose for each action in this theme whether it should be: included in this plan, reserved for the future, or not included (or unsure).**

- Support to develop innovative funding streams (public and private sector) - included in this plan
- Highlight existing public and private sector funding streams such as SMEEF that already target this phase - included in this plan
- Promote the importance of funding project development activities to a wider range of funders- included in this plan
- Work with regulators and other public bodies and de-risk project development (for example by providing more clarity on costs and timelines for licenses and consents) - included in this plan
- Maintain support for SMEEF for duration of this first plan - included in this plan
- Explore the potential for a matchmaking service linking businesses to projects- included in this plan
- Use SMEEF to leverage funding into community-led projects - included in this plan

9. **Is there any further information you would like to share with us on the objectives or actions in this theme?**

It is important that funding addresses burnout from volunteers which is often overlooked and was identified as a barrier at the community led marine management roundtables.

We must break away from short term political thinking on issues, and make a long-term economic case around jobs, benefits to communities and to nature (including ecosystem services such as coastal protection) to provide a long-term vision of what restoration could achieve. We agree that we must present marine restoration as an enabler, in creating new jobs and opportunities for local communities.

The plan encourages private sector investment, however it appears to lack robust safeguards to ensure local communities are not sidelined or exploited. The plan must ensure that any private sector contributions are tied to clear benefits for local communities. It will be important to develop a finance model that could work across Scotland though allowing for adaptation to local contexts.

Other suggestions for funding restoration discussed at the community led marine management roundtables were:

- Introduction of a conservation levy
- Centralised hub offering sustainable funding to community groups
- Blended finance to ensure long term financial sustainability, but initial onus would still be government and philanthropy
- Seed funding from government, linking with public interest

<u>Supply chains and communities</u>

10. **On a scale from 1 to 5, how would you prioritise each of the objectives in this theme?**

1 the objective is not at all important
2 the objective is not very important
3 neutral
4 the objective is quite important
5 the objective is very important
0 I am unsure

- Support knowledge exchange, data sharing and best practice learning on active restoration between projects and across the sector - 4
- Increase participation and engagement of other marine and coastal users in restoration - 4

- Support more resilient supply chains for restoration while maintaining high standards of biosecurity 4

11. Please choose for each action in this theme whether it should be: included in this plan, reserved for the future, or not included (or unsure).

- Foster communities or practice, both through existing networks and new networks and platforms where helpful
- Work with interested institutions to explore the potential for a biennial conference and other workshops or training events for practitioners and academia with a focus on sharing practical learning
- Use the one stop shop noted in Theme 2 as a platform for knowledge exchange, case studies and data sharing (including citizen science)
- Explore the potential for a prize for restoration innovation
- Encourage early engagement with other marine users in project development
- Publish case studies on how restoration activities can benefit multiple marine users and/or where cross sectoral efforts have been successful
- Promote the socio-economic development potential of restoration as a sector
- Support new and existing enterprises aimed at developing supply chains
- Update and expand guidance on supply chain best practice, for example biosecurity and genetic diversity

12. Is there any further information you would like to share with us on the objectives or actions in this theme?

We strongly support highlighting the importance of communities and communities of interest in marine restoration, they should be seen as a partner or ally and local voices must be listened to and given due weight in decision making.

When thinking about governance mechanisms co-design with communities must be a priority. Support for community led restoration could include:

- Improving process literacy- there is more work to be done to make marine restoration more inclusive, improving process literacy in terms of how to go about implementing a restoration project but also in a wider sense on ocean literacy
- Broader stakeholder base - it will be important to reduce conflict between different groups if restoration is to succeed. We can begin to think about our language and how we engage, for example highlighting the benefits to the economy of marine restoration (nursery grounds, better

water quality, coastal resilience etc) to reduce the "us vs them" mentality. Communication between different groups could also be improved by using multi-faceted solution based conversation tools and methods.

- Implementing trial areas or projects - In terms of trial projects a roadmap for communities of case studies including lessons learned would be useful.
- Using bottom-up approaches - these are very important in encouraging sustainable, long-term stewardship and deeper connections between communities and the marine environment

We agree that having a place-based approach is important, rather than creating marine local place plans separately we could look to embed the marine environment in current local plans. The plan should also include support for including community led restoration and management in regional marine planning.

We would also support a conference, perhaps an annual gathering rather than biennial, to help to share information and knowledge, which will reduce working in silos and encourage collaboration.

Evidence and monitoring

13. On a scale from 1 to 5, how would you prioritise each of the objectives in this theme?

1 the objective is not at all important
2 the objective is not very important
3 neutral
4 the objective is quite important
5 the objective is very important
0 I am unsure

- Support improved and more standardised evidence gathering and monitoring for active restoration - 4
- Improve understanding of how active restoration can contribute to targets and generate environmental, social and economic benefits - 5
- Improve the availability of information on restoration projects in Scotland- 4
- Explore the potential contribution of citizen science to data collection and monitoring - 4

14. Please choose for each action in this theme whether it should be: included in this plan, reserved for the future, or not included (or unsure).

- Work with projects and research institutions to develop and share user friendly, standardised data collection best practices for before, during and post-restoration activity - include in this plan
- Develop understanding of ways to measure how restoration efforts contribute to achieving good environmental status and other targets in our marine environment - include in this plan
- Help and encourage projects to capture data on social and economic impacts of active restoration include in this plan
- Establish and maintain a database of restoration projects

15. Is there any further information you would like to share with us on the objectives or actions in this theme?

We would support increased transparency and accessibility of data from government bodies such as Nature Scot and Marine Directorate. Participants at the community led marine management round table in March 2025 suggested a "get to know your local policy officer" scheme may be useful in terms of knowing who to go to with and/or for information. This could also be part of the one-stop-shop/marine facilitator role.

It will be important to identify where the current gaps are in our knowledge and ensure that data collected is accessible to the public. It will also be important to consider anecdotal data using quantitative methods such as interviewing community groups. This could be done in collaboration with universities or projects involved in social science, and by involving local archives or libraries.

We welcome the inclusion of citizen science as an important data collection tool that can increase public participation and awareness, but we would reiterate the point on funding for groups to avoid volunteer burnout.

Standardised monitoring protocols must be put in place to ensure that restoration efforts are guided by scientific data. The absence of specific restoration baselines or measurable targets may reduce accountability and the ability to track progress.

Overall approach and plan content:

16. Overall, do you think this plan will support acceleration of restoration in Scottish coasts and waters?

1 yes a lot
2 yes a little
3 neutral
4 not a lot

5 not at all
0 unsure

17. Do you agree with the content of the plan?

1 strongly agree
2 somewhat agree
3 neutral
4 somewhat disagree
5 strongly disagree
0 unsure

18. Are there any actions or objectives that you feel are missing and should be included and prioritised for the first Marine and Coastal Restoration Plan?

Some specific recommendations have been given under each theme.

The Plan as laid out will do little to help meet the objective of halting biodiversity loss by 2030 or the SBS objective to accelerate restoration and regeneration. The actions proposed are largely things that the restoration community are already doing and have been doing for some time - identifying suitable locations for restoration, monitoring, building the evidence base, navigating the regulation etc. At best this Plan will provide some coordination and coherence for the restoration community but this is at the expense of delivering real impact through measures that could address the very real barrier of regulation. There are opportunities to simplify the Marine Licensing process, e.g. through exemptions for specific species using secondary legislation or applying a fast-track system, while applying appropriate checks and balances. In Wales a seagrass restoration exemption is expected imminently, while in Scotland the proposal is that we will have to wait for the next iteration of the plan before this is considered. However, the state of nature in Scotland means we don't have time to wait.

19. Noting that we will develop a monitoring and evaluation approach for implementation and review of the plan, do you have any comments you wish us to consider at this stage? Please provide any feedback on monitoring and evaluation of the plan below

We agree with the proposal for the plan to be iterative and reviewed after 5 years to take stock of what actions have been met and what issues need to be further addressed. We agree that a monitoring framework would be useful as part of the review cycle, covering both the environmental and socio-economic effects of actions taken. We would reiterate the point that without setting out targets it may be more difficult to review progress.

Impact assessments:

20. **Do you think that the SEA Environmental Report is an accurate representation of the potential impacts (positive or negative) on the environment resulting from the objectives and actions proposed in this plan?**

Yes

No

Unsure

Other

Please use this space if you would like to expand on your answer, including in relation to any potential impacts discussed in the Environmental Report, or other relevant impacts you feel should be considered

We agree that the positive impacts of enabling marine restoration outweigh any negative impacts. However, even though the negative impacts have been found not to be significant, robust, and enforceable mitigation strategies should be developed for the risks identified in the SEA, taking a precautionary approach. It should also be noted that the degree of positive and negative effects will depend both on the site and on the measures proposed.

21. **Do you agree that the partial BRIA is an accurate representation of the potential costs, benefits and risks on the public, private or third sector, and regulators, associated with the objectives and actions proposed in this draft plan?**

Yes

No

Unsure

Other

Please use this space if you would like to expand on your answer, including in relation to any potential impacts discussed in the partial BRIA, or other relevant impacts you feel should be considered

We agree with the approach of reviewing the BRIA at the same time as any plan reviews due to the challenge in predicting costs (both positive and negative) at this early stage.

22. **Do you think that objectives and actions proposed in this draft plan will have an impact that is significantly different (positive or negative) for some or all island communities than for other communities (including other island communities)?**

Yes

No

Unsure

Other

Please use this s pace if you would like to expand on your answer. If you answered 'Yes' this could include information on what significantly different impacts you think there may be, and whether these would be positive, negative or both.

Marine restoration projects offer the opportunity for green jobs, education, and community wealth building, which can strengthen rural and coastal economies. It will be important to provide offline resources and training to make the plan accessible to all communities, including remote island populations. The reliance on digital tools like databases and one-stop-shops may exclude communities with limited internet access or technical expertise, and miss local context.

23. **Do you think that the objectives and actions proposed in this draft plan will have an impact (positive or negative) on protected characteristics, with particular regard to eliminating unlawful discrimination, advancing equality of opportunity and promoting good relations?**

Yes

No

Unsure

Other – neutral impact

Please use this space if you would like to expand on your answer. If you answered "Yes" this could include information on what impacts you think there may be and whether these would be positive, negative or both.

24. Do you think that the objective and actions proposed in this draft plan will have an impact (positive or negative) on children's rights and wellbeing?

Yes.

No

Unsure

Other

Please use this space if you would like to expand on your answer. If you answered "Yes" this could include information on what impacts you think there may be and whether these would be positive, negative or both.

Positive impact regarding the potential for restoration to contribute to reversing biodiversity loss and increasing climate resilience (including coastal protection as shown in the recent MCCIP report on coastal flooding[2]), creating a more sustainable marine environment for future generations.

[2] (https://www.mccip.org.uk/sites/default/files/2025-08/Coastal%20Flooding_update%20Aug%202025.pdf

This response was compiled on behalf of LINK Marine Group and is supported by: Scottish Wildlife Trust, RSPB Scotland, Chartered Institute of Ecology and Environmental Management (CIEEM), WWF Scotland, National Trust Scotland.

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