

Revision of the Scottish Biodiversity List 2025: feedback from LINK

Key points:

- The revised Scottish Biodiversity List (SBL) must be used and updated regularly to guide and prioritise restoration action and lever funding
- The revised SBL must reflect the necessary level of ambition the nature and climate crises require. It is a tool for all sectors to use, not just Scottish Government
- Funders and users must be clear that this list is not definitive and that a wide range of action is required across Scotland to meet nature and climate targets
- Clear communication at its launch will be required around list purpose, list use, flexibility and review and to ensure that the revised SBL can meet its full and necessary potential.

September 2025

Background

LINK members have been pleased to input into the revision of the Scottish Biodiversity List 2025. We believe this is an important exercise that with a good outcome provides an effective tool to help guide the scale and speed of action that is clearly needed to address Scotland's biodiversity loss by 2045. 24 LINK member staff from 16 member organisations have taken part in 2 workshops for terrestrial species and marine habitats and species to date. Further input will be facilitated through online workshops on 13 October.

Discussion

LINK members have contributed to the live spreadsheet shared by Naturescot for both terrestrial and marine species and habitats. As this work has progressed, LINK has collated feedback from all those involved on the process, outcomes and next steps in order to help guide this process, contribute to strong and high quality outcomes and build an effective and efficient review process moving forward. This report summarises feedback to date.

Approach

LINK members welcome the revision of the Scottish Biodiversity List and the opportunity to comment. It is good to see the list evolve with some species and habitat changes.

Habitat/ecosystem measures alongside targeted species recovery actions: We welcome the inclusive approach to ensure that species and habitats remain central to delivery of nature restoration. Including species that can be recovered via habitat/ecosystem measures and those that need targeted species recovery action is the only way Scotland will reverse current trends and it is important that both



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approaches are adopted: this assessment does not and must not make the assumption that ecosystem measures will essentially be enough. Seabirds for example need the marine ecosystem food chain in good health, but also need targeted species recovery action like INNS eradication and biosecurity on islands or they will not recover.

Speed of the process: The process for the list revision has been very swift and as a result sometimes confused. We recognise that Naturescot have not been given long to complete this large and important exercise and as a result, there was some confusion around the list purpose and criteria for inclusion, with Naturescot staff at the workshop not being necessarily very clear themselves. We recognise that as the process develops, those clarifications are being provided, which are very welcome. Clarification for list finalisation is crucial as is consistency when the list is being reviewed. The workshop in mid October will help with this.

Challenges in applying PMF criteria: For marine species and habitats, the original intention to use the current Priority Marine Feature (PMF) list to update the Scottish Biodiversity List (SBL) was of significant concern to LINK's Marine Group members. We noted that initially 89 species from the SBL did not pass the PMF criteria, and we were very concerned that they would be therefore removed from the list, including blue whale and green turtle for example. We are reassured that this is no longer the case. We are pleased to see that the Humpback whale, while not currently included on either list, will now be added to both the SBL and PMF list. This is a welcome development given the increasing number of sightings and entanglement risk for this species. We believe that assessing the list against PMFs and removing species that are of conservation importance is inappropriate and we are pleased to see the flexible approach that is being adopted to include species that would otherwise be missed.

We provide more detail on this below.

Issues with proportional representation as a selection criteria: We therefore support updating the Scottish Biodiversity List (SBL) with less reliance on criteria like proportional representation, which may lead to problematic outcomes, such as the removal of species that are still ecologically important. The process must allow room for flexibility where species meet other key criteria (e.g. population decline, functional importance), even if proportional representation is borderline. For example,

- **Cetacean species:** Cetaceans face threats that are not well captured by PMF assessment because PMF criteria emphasise decline, proportional importance, and functional role. But many cetacean threats are diffuse and transboundary (bycatch, underwater noise, ship strikes, pollutants) rather than localised habitat pressures. Cetaceans may appear to “fail” PMF criteria even while facing serious conservation challenges that require action through the SBL framework and should therefore be included on SBL. A precautionary approach must be adopted.
 - **Blue whale, sei whale and North Atlantic right whale:** these whales fulfil the 3 PMF criteria, as they are of international importance, very depleted by commercial whaling including off Scotland, and are of significant functional/ecosystem importance.
 - **Beaked whales:** Evidence from recent large-scale unusual mortality events (UMEs) demonstrates that beaked whales are more common in Scottish waters than existing sighting data suggest. Visual survey/monitoring methods under-represent these species, which are deep-diving, cryptic, and found largely in offshore waters, where survey effort is limited. UME and strandings data ([Dolman et al., 2021; 2025](#)), as well as data from large scale surveys (i.e. [Hammond et al., 2009](#)) and potential acoustic detections ([van Geel et al.,](#)

[2022](#)), provide evidence of their presence. These species meet key PMF criteria: they are globally threatened, highly sensitive to disturbance, under-recorded but demonstrably present in Scottish seas, and functionally important as deep-ocean predators. Recognising beaked whales (Mesoplodon, Ziphius and Northern bottlenose whale) as PMFs would ensure that management decisions properly account for their presence and vulnerability and would strengthen Scotland's ability to safeguard deep-water ecosystems from damaging activities.

- **Seabirds:** LINK members welcome the inclusion of seabirds on SBL. There are concerns that there remain some major omissions. For example:
 - **Little Tern:** The population has declined by nearly 30% in Scotland since 2000, according to the Seabird Count. Key threats include predation and human disturbance at nesting sites.
 - **Sandwich Tern:** Experiencing population declines in the UK and has been badly hit by HPAi shortly after Seabird Count. Also Sandwich tern is listed under the scope of Seabird Action Plan, so would make sense for this to be included in SBL
 - **Roseate Tern:** Threatened by extreme weather events and loss of nesting sites due to coastal change and are currently Birds of Conservation Concern listed as red.

How the list should be used / not used

Use of the SBL: The purpose of list needs to be carefully communicated to all stakeholders (including the public), but especially to non-government funders, including NLHF. There is widespread concern amongst LINK members that funders and donors from outside Government will think that this is a definitive list, and funding will therefore be directed only to the species and habitats on the list. This will need clear, careful and ongoing communication around the launch of the list to avoid this outcome. For those who already use the SBL in its current form, communication will also need to be clear about the changes and its proposed uses, which will be different.

Review of the list: regular review will be vital if the revised SBL is to be used, seen to be used and effective in increasing progress towards Scotland's nature and climate targets. This cannot be a static list that simply ticks a box once published. It needs to be referred to, updated and used as tool to lever appropriate funding.

Accounting for climate-driven shifts in distribution and emerging evidence: emerging and wider evidence of expected northward range shifts for marine species, driven by climate change and changing oceanographic conditions needs to be accounted for in the SBL. Regular review will help but it is important to recognise the need to account for such species at this stage. For example, Striped dolphins have been recorded in Scottish waters through strandings data and occasional visual sightings.

Opportunities for a revised list

This review and its launch provide a very clear opportunity, if executed properly, to communicate Scottish Government's commitment to species and habitat restoration and its work towards global targets.

Leverage: An up to date SBL can be used as a powerful tool to lever funding to achieve our overall target of halting biodiversity loss.

Regular revision of the list is required: we would hope that as action and resources are invested in species and habitat restoration, the list will evolve as species and habitats status change over time. This is vital if SBL is to guide and inform future SBS Delivery Plans, which also operate within changing physical environments and also changing political environments. The actions driven by this list are by their nature long term and flexibility alongside consistency is vital if long term outcomes are to be achieved.

Cross checks: Many organisations maintain lists of species and habitats to work on. Maximum efficiency will be achieved if SBL cross references those lists in order to support and build visibility. This includes, for example, the Cairngorms National Park Authority priority list and organisational lists, eg National Trust for Scotland. Cross referencing these should be a key part of the review process. Obviously these lists serve different purposes geographically and operationally but for those species and habitats with a national stronghold, they provide useful sanity checks.

It is also welcome and a clear opportunity to align both SBL and the PMF, which will be reviewed at a later stage. Both will benefit.

Risks for a revised list

Scope: There have been many concerns about the length and scope of the revised SBL. These are detailed below in relation to PMF specifically and some have been resolved as the process has progressed. However, all have served to indicate where communication around the launch and use of the list will be crucial. It is vital that when the list is launched, it is very clear what the scope, purpose and use of the revised SBL will be and when and how it will be revised. This will ensure these concerns do not resurface.

Ambition: the SBL must not be limited to actions that Scottish government and its agencies alone can do. The biodiversity crisis cannot be solved by Government alone and all the tools required to address it must be supported and used by all actors in nature conservation. The danger of limiting the list, and other tools around 30x30 or nature finance for example, will serve to limit ambition unnecessarily and counter productively and runs the significant danger of sucking all funding up. See also below.

Funding: we have significant concerns that funders will refer to this list and that will limit opportunities to work on species and habitats not included on this list for reasons including, but not limited to, data deficiency or requiring further evidence for habitat interventions. Given the scale and speed of required action, this list must be one tool but must not be used to limit or restrict nature restoration activities, all of which contribute to tackling the issue of biodiversity loss in Scotland.

Review vs action: delivery and funding for delivery should be looked at over length of two Delivery Plans, 12 years. For example in woodland restoration and tree species 12 years is too short a period to see restoration. This can mean that organisations get pushed into working with shorter life span species and neglecting key actions that build greater long term resilience and ecosystem health. This tendency counters long term ambition and must be guarded against. Given the clear need for longer term funding beyond 6 year cycles, how should the Forestry Grant Scheme use this list for example?

Using the PMF list exclusively to inform the revised SBL: We have outlined above the significant risks with this approach and we welcome the flexibility that has been introduced to the SBL review to ensure that PMF only partially informs the SBL revision. The reasons for our concerns are:

- Different legal purposes: SBL is a statutory list under the Nature Conservation (Scotland) Act 2004, intended to capture all biodiversity priorities in Scotland (land, freshwater, marine). Its role is to guide public bodies in fulfilling their legal biodiversity duty. PMFs are a policy tool, not statutory,

designed mainly to guide marine planning and conservation management. If PMF criteria were applied wholesale to cetaceans on the SBL, it could narrow the scope of a statutory duty to the more limited purpose of marine management. This could mean that common but keystone cetaceans that are vital for ecosystem function, cultural significance, public engagement are filtered out, and that Scotland's international obligations are not delivered, undermining the SBL's broader conservation and statutory purpose. Furthermore, cetaceans are listed under EU Habitats Directive, OSPAR, CMS, ASCOBANS, and other agreements, not all of which align neatly with PMF threat-based criteria. Scotland has obligations to protect and report on all cetaceans, not just those that meet PMF thresholds. Narrowing to PMF criteria might conflict with Scotland's duty to uphold international commitments.

- PMF criteria are habitat/feature-oriented, not species-oriented: PMFs were developed primarily to identify vulnerable marine habitats and sedentary features that can be managed spatially (e.g., corals, seagrass beds, horse mussel reefs). Cetaceans are mobile, wide-ranging species that do not fit neatly into the same decision framework. For example, "Proportional representation" (whether Scotland holds a significant share of the global/national population) is harder to apply to migratory cetaceans where distribution shifts seasonally. The JNCC Guidelines for Minimising the Risk of Injury to Marine Mammals from Geophysical Surveys (most recently updated in 2017), the UK Continental Shelf (UKCS) edge/slope is explicitly recognised as an Area of Importance for migratory baleen whales. These areas are described as "Areas of Importance" (AoI) in the guidelines, meaning zones where heightened consideration is required in relation to seismic survey activity. The AoI concept is used to flag habitats/regions where marine mammals are more likely to be present, often linked to prey concentration, migration routes, or breeding/nursery areas.

"Functional importance" is clearer for benthic habitats (e.g., kelp forests) than for top predators, where roles are diffuse but still ecologically critical but there is growing evidence of this, e.g. Roman, J. et al. (2025), reference below. Applying PMF logic risks under-recognising cetaceans simply because they don't map well onto the criteria.

- Risk of narrowing SBL scope and its statutory requirements: The SBL explicitly includes widespread species if they are of "principal importance" to biodiversity conservation, not just the rarest or most threatened. In contrast, PMF criteria emphasise proportional representation, decline, and functional role. Many cetacean threats such as bycatch, underwater noise, ship strikes, pollutants, are wide-ranging and transboundary, rather than localised habitat pressures, meaning species could appear to "fail" PMF criteria even while facing serious conservation challenges that require action through the SBL framework.

Next steps

The Species at Risk list was an important contribution to this revision process: the Species at Risk list that is publicly available <https://species-at-risk.nature.scot/search> does not include the work completed at a later stage to categorise the species on the list into a tiered system based on objective and subjective criteria. We strongly recommend that this should be available as a valuable resource in planning conservation action in Scotland.

The length of the list must reflect the ecological need - not a figure chosen for reasons of ease of management or what is deemed 'practical'. The biodiversity crisis is what it is - and cannot be shaved and re-sized for expediency. It must be extremely clear to funders that these are not the *only* species that

require funding for conservation action. However, it does need to be highlighted as a list of species that we have collectively recognised as requiring immediate resource to prevent further loss or decline.

Final pre publication review: LINK members are looking forward to continuing to contribute to this review and welcome the opportunity to review the list before it is finalised. We hope that the workshop on 13 October will work from a fully completed spreadsheet to enable experts to review it efficiently, effectively and quickly. The tight deadlines mean that not everyone will be able to attend and we would welcome some mechanism to ensure those not able to attend can input in some way.

Habitat list: the August workshop had insufficient time to consider habitats, which will now be considered on 13 October. We look forward to hearing clarifications on how habitats have been selected as we offer input on 13 October.

How could the review approach be improved

Lack of time: we appreciate that NS were not given as much time as they would have liked for this process but, that being the case, efficient organisation of the review process is imperative. There was a lot of confusion for the in person workshop and the allocation of a half day for such an important task was insufficient. Given that, it was good that the organisers pivoted on the day to allow additional time to discuss the species list, but this was at the cost of habitats discussion, which will now happen at the very last stage. It is always difficult to get the right people in the room at the last minute but facilitators at the in person workshop were subbing for other NS staff experts and were not super familiar with the spreadsheet, its operation, or the criteria for inclusion on the list. The unfortunate IT issues on the day with a shared spreadsheet were also difficult for facilitators to manage and led to some frustration. For such an important task, it would have been helpful to see far more liaison across the different groups, with multiple meetings of stakeholders and discussions, alongside very clear criteria for selecting species. The tight timescale evidently meant this had not been possible. For future revisions, this process requires more time, better organisation, wider stakeholder consultation and clearer guidance.

Future reviews: LINK has a lot of experience in running similar workshops and would be very pleased to assist in ensuring that sessions are planned, facilities and have access to appropriate resources.

Useful references

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This report was compiled with input from staff from:

Royal Zoological Society of Scotland
Froglife Trust
Butterfly Conservation
British Dragonfly Society

RSPB Scotland
Hebridean Whale and Dolphin Trust
Whale and Dolphin Conservation
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.

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Appendix 1: Additional detail from Hebridean Whale and Dolphin Trust:

Background

NatureScot intend to update the Scottish Biodiversity List (SBL) to align with the Priority Marine Feature (PMF) list. This will result in the removal of 89 species that do not meet the PMF criteria. Under this approach, we expect several cetacean species would be removed from the SBL including blue whale, sei whale, North Atlantic right whale, True's beaked whale, Cuvier's beaked whale, false killer whale, and striped dolphin. Humpback whale is not currently included on either list, but NatureScot have reviewed the evidence and have confirmed that it now meets the PMF requirements and will be added to both the SBL and PMF list. This is a welcome development given the increasing number of sightings and entanglement risk for this species.

Concerns and evidence

We have concerns that applying PMF criteria to cetaceans on the SBL would narrow the statutory scope, risk excluding species of ecological or historical importance, and under-represent highly mobile species that face widespread, non-habitat specific threats.

Even though all cetacean species are classed as European Protected Species and are covered under a variety of international agreements, NatureScot told us that this does not mean they all meet the PMF requirements. Species and habitats are assessed based on:

- whether the species/habitat occurs in significant numbers in Scotland's seas
- whether the species/habitat is under threat or in decline
- the functional role that the species/habitat plays

To list a species/habitat as a PMF, it needs to be supported by proportional evidence. NatureScot said that if we can provide evidence to demonstrate a species' presence and proportional importance in Scottish waters, they would be happy to receive it.

For cetaceans, the Scottish Biodiversity List is the most comprehensive list covering all currently known inshore and offshore species in Scottish waters, with the exception of very rare records of pygmy sperm whale, beluga and Fraser's dolphin. The datasets that NatureScot mentioned are commonly used to compile the evidence (NMPI, GeMS, OBIS) often lack adequate information on elusive or rarely observed species. For these species, additional sources of data such as strandings records, sightings from long-term citizen science programmes, passive acoustic monitoring and historical records are essential to demonstrate their significance. Additional datasets should therefore be considered for cetaceans, and a precautionary approach applied for species that are elusive or infrequently recorded. Here, we put forward some additional sources of evidence to support the retention of large whales and beaked whales on the SBL, and to make the case for their inclusion in the PMF review.

1. Recovery of large whale populations

Scotland's waters were once an important area for large whale species including blue, sei, and North Atlantic right whale. This is clearly demonstrated in the whaling records that show these species occurred in substantial numbers with hunting leading to localised extinctions (i.e. North Atlantic right whale) and severe population declines ([Clapham et al., 1999](#); [Ryan et al., 2022](#)). Recent acoustic monitoring also

confirms that sei whales continue to use offshore waters off the west coast, underlining Scotland's role in their recovery ([van Geel et al., 2022](#)).

These species meet the key PMF criteria: they were historically regular visitors in Scottish seas, populations were decimated by whaling and they remain at threat (blue and sei whale endangered, and North Atlantic right whale critically endangered), and they all play a critical functional role in ocean ecosystems supporting nutrient mixing and climate regulation by supporting processes that sequester carbon and enhance ocean productivity.

Their presence is characteristic of Scotland's offshore ecosystems, and there is a clear management case for reducing threats such as entanglement and ship strikes. Recognising large whales as PMFs would reflect both Scotland's historical responsibility and its opportunity to support the recovery of species that are globally endangered while restoring the ecological functions they provide.

2. Adopt a precautionary approach for elusive and data-poor species (e.g. beaked whales).

Evidence from recent large-scale unusual mortality events (UMEs) demonstrates that beaked whales are more common in Scottish waters than existing sighting data suggest. Visual survey/monitoring methods under-represent these species, which are deep-diving, cryptic, and found largely in offshore waters, where survey effort is limited. UME and strandings data ([Dolman et al., 2021](#); [2025](#)), as well as data from large scale surveys (i.e. [Hammond et al., 2009](#)) and potential acoustic detections ([van Geel et al., 2022](#)), provide evidence of their presence. The difficulties of identifying beaked whales to species level at sea are well documented. Species of the genus *Mesoplodon* and *Ziphius* have stranded in significant numbers on Scottish coasts in recent years and so should be included as PMFs.

These large-scale mortality events also demonstrate the vulnerability of these species and the urgent need for robust management measures to mitigate threats. These species meet key PMF criteria: they are globally threatened, highly sensitive to disturbance, under-recorded but demonstrably present in Scottish seas, and functionally important as deep-ocean predators.

Recognising beaked whales (*Mesoplodon*, *Ziphius* and Northern bottlenose whale) as PMFs would ensure that management decisions properly account for their presence and vulnerability and would strengthen Scotland's ability to safeguard deep-water ecosystems from damaging activities.

3. Account for climate-driven shifts in distribution and emerging evidence

Striped dolphins have been recorded in Scottish waters through strandings data and occasional visual sightings. While these records are relatively limited, they align with wider evidence of expected northward range shifts for cetaceans, driven by climate change and changing oceanographic conditions.

It is also important to recognise that strandings and occasional sightings are likely to underrepresent occurrence, meaning these records should be treated with a precautionary approach. Retaining striped dolphins on the SBL would ensure that Scotland remains responsive to emerging evidence and proactive in recognising ecosystem change. This would help management decisions reflect both current records and likely future biodiversity in Scottish waters.

Wider comments on the SBL/PMF alignment:

1. Different purposes of the lists:

The SBL is a statutory list under the Nature Conservation (Scotland) Act 2004, intended to capture all biodiversity priorities across land, freshwater and marine environments. It guides public bodies in fulfilling their biodiversity duty.

The PMF list is non-statutory and designed primarily to guide marine planning and conservation management. Applying PMF criteria wholesale to cetaceans on the SBL risks narrowing the statutory scope to the more limited purpose of marine management.

2. Challenges of applying PMF criteria to cetaceans

Species vs habitats: PMFs were originally developed for habitats and sedentary features, while cetaceans are wide-ranging and face transboundary threats that are not well captured by a spatially focused tool.

Functional role: Functional importance is clearer for benthic habitats (e.g. kelp forests). For top predators such as cetaceans, roles are more diffuse but still ecologically critical, and the scientific evidence for this is strengthening (e.g. Roman et al., 2025). Applying PMF logic risks under-recognising cetaceans simply because they don't map neatly onto the framework.

Threats not well represented: PMF criteria emphasise proportional representation, decline, and functional role. Many cetacean threats such as bycatch, underwater noise, ship strikes, pollutants, are wide-ranging and transboundary, rather than localised habitat pressures, meaning species could appear to "fail" PMF criteria even while facing serious conservation challenges that require action through the SBL framework.

3. Risks narrowing scope

The SBL explicitly includes widespread species of "principal importance" to biodiversity conservation, not only the rarest or most threatened. PMF criteria could filter out common but keystone cetaceans that are vital for ecosystem function, cultural significance, public engagement, and Scotland's international obligations, undermining the SBL's broader conservation and statutory purpose.

The current review process appears to rely heavily on proportional representation, but this could lead to problematic outcomes and removing species that are ecologically important. Flexibility is needed where species meet other key criteria (e.g. functional importance, population decline) even if proportional representation is borderline, as with some seabirds and large whales.

4. Wider obligations and implications

Scotland has international obligations under the Habitats Directive, OSPAR, CMS, ASCOBANS, and other agreements, which require protection of all cetaceans not just those meeting PMF thresholds. Narrowing the SBL to PMF criteria may conflict with Scotland's duty to uphold these international commitments.

There is concern that funders will look to the updated list as a reference point, potentially limiting opportunities to work on species excluded due to data deficiency or where further evidence is still required for habitat interventions.

Review of SBL content:

- Humpback whales are not currently on the PMF list but should be. NatureScot confirmed they have reviewed the evidence and humpback whale does now meet the PMF requirements and will be added. This is welcome news given the increasing number of sightings and entanglement risk for this species.
- Grey seal needs to be added to the SBL – listed as a PMF but not on SBL. NatureScot confirmed grey seal will be added.
- ‘Conservation action’ should be required for more species on the SBL – we were told that this will be removed as they will be linked to PMFs instead.
 - Humpback whale, fin whale and sei whale should be listed in the ‘Conservation Action Needed’ category considering the increasing number of reports of these species in Scottish waters year-round and threats faced by these large whale species.
 - In Scottish waters, humpback whales are susceptible to entanglement in Scottish waters with the Scottish Entanglement Alliance estimating 6 humpback whales entangled in creel pot lines each year ([Leaper et al., 2022](#)) over the period 2008 to 2018. Humpback whale presence in Scottish waters has continued to increase since then, along with an increased number of reported entanglements.
 - Wide range of other risks for large whales including ship strikes, with recent research highlighting this risk has likely been underestimated using widely available data ([Robbins et al., 2022](#); [Hague et al., 2025](#)).
 - Conservation action is needed to protect these large whale species in Scottish waters and support population recovery.
 - Beaked whales – recent large scale UMEs in Scottish waters, this should warrant conservation action for these species.
- What criteria are used to classify ‘rare’ species on the SBL? Why are bottlenose and Risso’s dolphins considered rare when they are regularly seen? There is even an MPA for Risso’s dolphins off the west coast.
- Some of the common names listed are unusual i.e. common porpoise, bottle-nosed dolphin and leathery turtle. These should be the conventional, widely used common names and need to be consistent with other lists i.e. PMF.
- There needs to be a mechanism to review in future given potential expected changes in distribution from climate change or new evidence available.