

### **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 Invasive Non-Native Species Working Group.

We welcome the opportunity to respond to the consultation on the Scottish INNS Action Plan. However, we note serious concerns about the compressed consultation timetable, which immediately precedes Stage 3 of the Natural Environment Bill. A plan of this importance should not be rushed to meet a self-imposed deadline, particularly when doing so risks failing to incorporate critical inputs, including the outcomes of the Natural Environment Bill, the findings of the Environmental Standards Scotland Call for Evidence on INNS and ongoing stakeholder discussions on unresolved and high-impact INNS issues. A short delay to allow these inputs to be incorporated would significantly strengthen the plan and improve its long-term effectiveness.

### **Response:**

#### **1. Do we have the right set of actions, and can they be strengthened in any way?**

The plan represents a step forward in structure and intent compared to previous approaches and broadly aligns with international standards, particularly in its emphasis on prevention, early detection and a whole of society approach. The Plan remains insufficiently transformative and in many respects replicates existing approaches without clearly demonstrating how delivery will be scaled up to meet the magnitude of the challenge.



The plan sets out clearly what needs to happen to address invasive non-native species, but it is less clear on how Scotland will move beyond the current situation. Scotland already has strong policy intent and a number of well-evidenced examples of good practice. Despite this, INNS pressures continue to increase, reflecting uneven action across ecosystems and regions, insufficient coordination at landscape and seascape scales, and constraints from short-term funding and limited delivery capacity. As highlighted in the [Scottish Environment LINK INNS report](#), Scotland already has strong policy intent and a number of well-evidenced examples of good practice.

To address this, the plan would benefit from a clearer articulation of how its ambitions will be translated into delivery. This could include a more explicit delivery framework that clarifies sequencing, roles, and resourcing alongside the headline outcomes and objectives. Introducing interim SMART milestones before 2030 would help track progress and enable adaptive management, rather than relying solely on long-term targets. There should also be a stronger commitment to scaling up new and more strategic approaches to INNS prevention and control, rather than depending primarily on voluntary uptake of existing mechanisms that have not delivered the step change required.

The plan would be strengthened by showing how its actions, objectives, and outcomes collectively deliver the long-term strategic outcomes in the Scottish Biodiversity Strategy and linking with the SBS Investment Plan. For water-related pathways, it should also link with the River Basin Management Plans and the National Marine Plans. Governance arrangements should be clarified, including the roles and reporting lines of the Non-Native Species Action Group. Public engagement mechanisms should be enhanced, and initial priority projects, species, and habitats should be listed to provide clarity on scope and prioritisation. Objectives should be SMART, with clear timeframes, and stakeholder engagement and funding actions should be distinguishable to enable effective tracking and accountability.

The plan and its supporting documents appear to rely heavily on priority species lists dating from 2016, despite the publication of the [2023 Horizon Scanning and Pathways Analysis](#). This risks undermining the plan's credibility and effectiveness, particularly given the pace at which INNS risks are evolving due to climate change, trade and land-use pressures. The plan should explicitly commit to using the 2023 horizon scanning outputs as the baseline evidence for prioritisation and make clear when and how priority species lists will be reviewed and updated to avoid the problem with GB level lists which are static and too bureaucratic to update. Some LINK members favour a ban on the sale of *Rhododendron Ponticum* - the process of pursuing listing is complex. Listing must be dynamic and regularly reviewed. Freshwater and marine INNS should be treated more explicitly, given their high risk and difficulty of management once established.



The plan does not yet fully match its ambition with the level of resourcing required for delivery. Without clearer commitments on funding, workforce capacity, and skills development, there is a risk that the plan remains aspirational rather than operational. While the plan acknowledges that investment in INNS work will need to increase, this must be articulated more clearly and robustly.

The Non-Native Species Inspectorate represents a major step forwards in national biosecurity but remains underfunded in comparison with comparable animal and plant health inspectorates. It is understood that only one inspector currently covers the whole of Scotland. Current resourcing for inspections, horizon scanning, and early warning systems is grossly inadequate, particularly in remote areas, and the plan should articulate this challenge while providing a framework to address it. Greater emphasis on prevention and early detection should be central to the action plan, as effective prevention and early warning can generate significant cost savings. NNSI also has fewer powers than the corresponding inspectorates for animal and plant health. For example, it does not have the same powers of entry to private dwellings. Scottish Government should accelerate action to identify what further powers may be needed for NNSI to undertake effective compliance and enforcement. Although the WANE Act provides for Species Control Agreements and Orders, these measures are rarely implemented and, as recent legal advice to NatureScot indicates, are inadequate when managing highly mobile INNS species. The Plan should clarify how their use can be strengthened.

There should be explicit expectations that dedicated funding will support prevention, surveillance, and rapid response, rather than relying on piecemeal or discretionary funding. Long-term, sustained investment is essential, as short project cycles are poorly suited to the realities of INNS management. The plan should include a clear Invasive Non-Native Species Investment Plan to outline funding priorities, ensure coordinated delivery, and provide accountability. Stronger links should also be made to green skills, rural employment, and wider nature restoration programmes to build the long-term capacity needed for action at scale.

## **2. Are there other actions/considerations that should be included?**

### *Land access for controlling highly mobile INNS*

Difficulties in accessing land to monitor and control highly mobile invasive non-native species, such as invasive predators on islands, remain a significant barrier. Experience in Orkney and other island contexts demonstrates the biodiversity benefits of coordinated landscape-scale control but also highlights practical constraints linked to land access. The plan should include a clear commitment to developing and consulting on proportionate mechanisms, legislative or otherwise, to enable timely and effective access while respecting landowner rights.



#### *Managing self-seeding non-native forestry species (e.g. Sitka spruce)*

The spread of self-seeding non-native conifers into sensitive habitats is a significant and growing INNS pressure - see [LINK report](#) for more detail. These species meet the UN definition of invasive non-native species and are already affecting biodiversity and restoration objectives. The plan should explicitly confirm that self-seeding non-native trees are within scope and commit to developing a robust policy and management framework aligned with forestry regulation and grant schemes.

#### *Better regulation of non-native gamebird releases*

The release of non-native gamebirds raises biodiversity, INNS, and disease transmission risks, including highly pathogenic avian influenza. The plan should commit to a formal programme of evidence gathering and clearly link that work to future policy and regulatory decisions, avoiding pre-emptive exclusion of gamebirds from INNS policy.

#### *Investment planning and Centres of Expertise*

The plan should include a detailed investment plan that quantifies INNS impacts, costs of control, benefits, funding sources, and priorities. There should also be clear reference to the polluter pays principle and blended finance approaches where appropriate. A dedicated INNS Centre of Expertise could coordinate innovation, knowledge sharing, and research across Scotland. Proactive monitoring in remote areas, including islands and freshwater systems, should also be incorporated.

#### *Incorporating ESS findings*

The plan should fully reflect the outcomes of the ESS Call for Evidence on INNS to strengthen enforcement, compliance, and legislative effectiveness. Integrating these findings would ensure that the plan addresses known weaknesses in current systems. Scotland Specific Pathway Action Plans: The development of specific pathway management plans that address local challenges unique to Scotland is critical, drawing insights from existing frameworks while focusing on regional needs. Reliance on the GB Pathway Action Plans risks not addressing Scotland-specific challenges, particularly as these plans are not yet signed off and are unlikely to be fully functional until 2027.

### **3. What kinds of information and support do organisations in Scotland need in order to prepare for supporting the delivery of this approach?**

Organisations will need up-to-date guidance, including a revised Code of Practice on Non-Native Species, clearly setting out roles, responsibilities, and enforcement thresholds.

Consistent and current priority species lists, improved access to surveillance data, and adoption of technologies such as eDNA and remote sensing are critical for prevention, early



detection (and adequate promotion of that tool to stakeholders), and rapid response, especially in remote areas.

Sustained investment in training, skills development, and organisational capacity is needed to support professional staff, local groups, and volunteers. Strong national coordination is required to avoid duplication, fill gaps, and ensure local and regional action contributes effectively to national priorities.

Multi-year funding models linked to agri-environment, forestry, and restoration funding streams are essential. Flexible financing, including blended approaches, will maximise investment and ensure sustainable delivery.

Effective public engagement tools, education, and outreach are vital to embed invasive non-native species management locally and support adaptive management. Access to monitoring frameworks, indicators, and lessons learned from existing projects should be improved. Currently, there are multiple routes for submitting records of invasive species, but no cohesive reporting strategy. The plan should address this and include knowledge sharing events to ensure stakeholders remain up to date with new and emerging techniques in data collection, mapping, and management.

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