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Gillian Martin, MSP,
Cabinet Secretary for Climate Action and Energy,
Scottish Government.

3rd November 2025

Dear Cabinet Secretary,

Scottish Environment LINK welcomes the Rural Affairs and Islands Committee's [Stage 1 report](#) on the Natural Environment Bill and your subsequent [response](#) on 23rd October. The LINK Marine Group particularly welcomes the recognition of a legislative gap relating to nature targets in the offshore marine environment (12-200 nautical miles). The Committee has asked the Scottish Government to clarify how this could be addressed.

LINK members are aware of the constitutional challenges posed by this issue but remain keen to ensure that the offshore marine environment is not forgotten. From LINK's perspective, a clear and proportionate way forward would be to place a statutory duty on Scottish Ministers to publish a Scotland-specific assessment of progress towards achieving Good Environmental Status (GES) in the marine environment. This could take the form of an amendment requiring Ministers to publish such a standalone assessment aligned with the UK Marine Strategy Regulations 2010 reporting cycle. Importantly, this assessment should cover both the inshore and offshore Scottish marine areas, providing a comprehensive picture of environmental status across Scotland's seas, and highlighting where existing targets and management measures apply or are absent.

The assessment would be consistent with the UK Marine Strategy regulations but disaggregated to report specifically on the Scottish marine area and laid before the Scottish Parliament. There is a strong case for this amendment. The latest UK Marine Strategy [Part 1 Assessment](#) (2024) shows deterioration in the health of the marine environment since 2018, with more indicators failing to achieve GES. The UK has already missed its legal target of achieving GES by 2020, and many concerns remain about the [status of Scotland's marine environment](#), including seabed health, status of biogenic habitats, seabird populations and status of cod stocks. Yet, responsibility for many aspects of marine management is devolved to Scottish Ministers, and achieving GES underpins all of Scotland's national biodiversity, climate and fisheries objectives. Transparent, Scottish-specific and spatially comprehensive reporting is therefore essential for accountability, effective scrutiny and for providing the evidence base to inform management interventions.

We recognise that questions remain about the setting of statutory targets beyond 12 nautical miles, given the current devolution settlement. That gap cannot be closed through this Bill. However, a



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statutory requirement for a Scotland-specific assessment of GES would make this gap visible and measurable, ensuring that offshore environmental outcomes are not overlooked and enabling Parliament to understand how effectively devolved powers are contributing to the overall condition of Scotland's seas. This would allow constructive debate on future options when the opportunity arises.

We would welcome the opportunity to discuss this proposal further with you and your officials as the Bill progresses.

Yours sincerely,



Calum Duncan

Convener, Scottish Environment LINK's Marine Group

Head of Policy and Advocacy, Marine Conservation Society



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