

Written submission to Climate Action Committee

August 2026

Biodiversity and nature recovery targets

Scotland faces an ongoing and significant decline in biodiversity. The health of the natural environment is essential for our economy, for food production, and for our collective health and wellbeing. Nature is the basis upon which our lives are built, and the decline of biodiversity – the diversity and abundance of species on earth – poses profound risks to our way of life.

In January of this year the UK government published a national security assessment outlining the risks caused by biodiversity loss. This assessment showed a range of global risks from biodiversity loss including crop failure, fisheries loss, water insecurity, and flooding.¹

Scotland is one of the most ecologically degraded countries in the world. The State of Nature report shows that 1 in 9 species in Scotland are threatened with extinction and there are long term declines of wildlife, seabirds, and flowering plants.² The Biodiversity Intactness Index shows that our biodiversity compared to historic benchmarks ranks 212th out of 240 countries and territories globally.³

Despite this, Scotland remains globally important for a range of species and habitats. Within our small corner of the planet we host ancient woodlands (including the Caledonian pinewoods and Scotland's rainforest), the UNESCO world heritage recognised blanket bogs of the Flow Country, and globally important populations of seabirds. There is much to be proud of, and with dedicated action and investment we can protect and restore our environment and leave a greener, more diverse country for future generations.

Within this parliament our priorities for action include:

- **The implementation of nature recovery targets.** LINK members were strongly supportive of the passage of the Natural Environment Act in the last parliament. The Scottish Government

¹ UK Government, Nature security assessment on global biodiversity loss, ecosystem collapse and national security, <https://www.gov.uk/government/publications/nature-security-assessment-on-global-biodiversity-loss-ecosystem-collapse-and-national-security>

² State of Nature report 2023, <https://stateofnature.org.uk/countries/scotland/>

³ Biodiversity Intactness Index, https://data.nhm.ac.uk/dataset/bii-bte?future-scenario=ssp2_rcp4p5_message_globiom&georegion=001&min-year=1970&max-year=2050&georegion-compare=null&future-scenario-compare=null&show-uncertainty=true&min-biigraph-y-axis=0&max-biigraph-y-axis=100&min-factorgraph-y-axis=0&max-factorgraph-y-axis=100&underlying-factor=crp



has stated that the targets should support action to halt nature loss by 2030 and substantially restore nature by 2045.

We share the concerns set out by [Environmental Standards Scotland](#) around the expected timeline for implementation of nature targets. Delaying the setting of targets leaves a vanishingly small window to influence outcomes ahead of the 2030 milestone, as well as making parliamentary scrutiny more challenging.

- **Investment in nature and the delivery of the Scottish Biodiversity Strategy.** Analysis conducted by LINK has found that, of the actions in the Biodiversity Strategy Delivery Plan:
 - 18 are completed
 - 69 are in progress
 - 16 are delayed
 - 33 are not started

The Biodiversity Strategy is the key policy document which should drive the action necessary to meet nature targets. The success of the strategy will require political leadership, cross-governmental coordination, and investment.

- **Delivery of 30 by 30.** Scotland has committed to the global “30 by 30” target to protect 30% of our land and sea by the end of this decade. Currently, 18.5% of Scotland’s land is classed by NatureScot as contributing towards this target, a rise from 18.2% in 2025. The pace of progress in designation must increase significantly to allow Scotland to reach the 30 by 30 target.

Importantly, NatureScot say that the proportion of this land ‘effectively managed’ for nature is significantly lower, at 14.1%. It is essential that our protected areas are effectively managed and robustly monitored. Site condition monitoring levels have declined over the past 5 years, with 2.9% of protected sites monitored in 2025 compared to 5.3% in 2021.

In the marine environment, 37% of our seas are designated as Marine Protected Areas, but many of these sites lack management measures leaving them protected in name only. The upcoming consultation on inshore MPAs will be an important step in ensuring the MPA network delivers for ecological outcomes and protects sustainable fisheries stocks.

Climate change

Restoring nature and tackling climate change go hand in hand. Climate change poses profound risks to our natural environment, many of which have been evident this summer with extreme heat, dry spells, and wildfires. Nature restoration however can play a key role both in capturing carbon and in adapting to a warmer climate in both urban and rural contexts.

Recent work by Environmental Standards Scotland, which found Ministers are failing in their legal duties to protect and restore the seafloor, has significant policy implications. When in good ecological health the seafloor can store significant carbon deposits. Restoration of our natural carbon sinks, including peatlands and woodlands, is essential to meeting both our climate and nature goals.

Environmental quality, protection and regulation

Water pollution

Discharges from sewer overflows are a persistent issue with implications for both environmental and human health. It is welcome that monitoring of overflows has increased in recent years, with just under half monitored in 2025 from an extremely low baseline of 6.7% in 2023. There were more than 15400 discharge events recorded in 2025, a rise from 10700 in 2021. Improvements are needed in both monitoring and enforcement.

Access to justice

Scotland remains in breach of Article 9 of the Aarhus Convention which requires access to justice in environmental matters to be 'fair, equitable, timely and not prohibitively expensive.' The governing bodies of the Convention gave Scotland until 1 October 2024 to implement their six recommendations to remove barriers to justice, but the Scottish Government has committed to only minor reforms.⁴

The introduction of a dedicated Scottish Environment Court is a longstanding ask of the sector, inspired by the more than 1200 environmental courts and tribunals operating internationally.⁵

Ecocide and Regulatory Reform (Scotland) Act

The previous parliament considered a Members' Bill to criminalise ecocide, although concerns over key issues including how a new offence would interact with existing law, as well as a lack of time before dissolution, meant this proposal fell at Stage 2.

Notably the Regulatory Reform (Scotland) Act already makes it offence to cause significant environmental harm. The Committee considering the Bill recommended that the next Scottish Government examine why section 40 has been used so rarely and what may be limiting its effectiveness.

Water (drinking water quality and regulator)

As this dry summer has clearly shown, climate change poses significant challenges to our water resources. Reducing leakages from the drinking water mains network and encouraging greater efficiency of use can play a role in increasing resilience. LINK members would encourage the committee to scrutinise the variety of issues in the water environment, including water scarcity and flood risk, in the context of increasing climate impacts. In many cases investment in nature-based solutions are cost-effective answers to these challenges.

Circular economy and waste

The way materials are used in Scotland is harming people by adding to the cost-of-living crisis and climate breakdown. This needs to change but current efforts to create a circular economy are failing.

The 2024 Circular Economy (Scotland) Act, and the strategy and targets mandated by it, will set the policy agenda for this area for the next five years.

⁴ ERCS <https://www.ercs.scot/law-reform/aarhus-convention/>

⁵ UN Environment Programme, Environmental Courts & Tribunals: A Guide for Policy Makers
<https://www.unep.org/resources/report/environmental-courts-tribunals-guide-policy-makers>

According to the CE Act, these targets should consider how material consumption and whole life carbon emissions associated with materials can be reduced. The targets must be linked to the CE strategy, published in March 2026, which sets out a vision that “by 2045 ... Scotland has a sustainable level of material use”.

A better way is possible, where less materials are used and people’s lives are improved. In a circular economy, the products people buy will last for longer, there is less rubbish and litter and local businesses support the needs of communities more.

The most important steps to take this parliamentary session are:

- Setting new **statutory targets for the circular economy**. The right target can drive the systemic change needed.
- Implement a strong **ban on the disposal of unsold goods** when draft regulations are introduced to Parliament.
- **Stop waste incinerators** being built in Scotland – six more could start operating over this parliamentary period.
- Require more **investment in reuse** so that everyone in Scotland can access these services, which improve people’s lives.
- Call for an ambitious 5-year **Extended Producer Responsibility programme** that means businesses must pay to clean up of their products, rather than this being funded from the public purse.

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

For more information contact:

Dan Paris
Director of Policy and Engagement
dan@scotlink.org