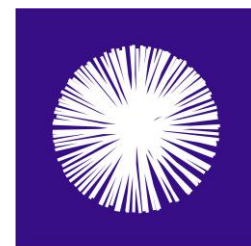


Response to National Islands Plan and Island Communities Impact Assessments

from Scottish Environment LINK's Wildlife Subgroup

Date: 26th July 2019



Scottish
Environment

LINK

Summary

The twin emergencies of climate and ecological crises underline the urgent need to employ nature-based solutions in our bid to tackle climate change and restore ecological balance. Scotland's islands are vulnerable to climate and ecological pressures, and as island biodiversity hotspots, host ecological sites of national and international significance. The National Islands Plan and Communities Impact Assessments must frame measures to bring transformative change that are able to address these crises and the challenges faced by islands and their communities.

On this basis the National Island Plan should incorporate the following:

- Provide for an effective and well-resourced strategy for Scotland's islands.
- Protect and enhance natural sites of national and international significance.
- Put nature-based solutions at the heart of island investments, to enhance local ecosystems, build community resilience and address climate change.

LINK welcomes this opportunity to respond to this consultation. This response contributes to those consultation questions that are relevant to our areas of work.

Q1. If applicable, which island(s) do you live on or do you relate to?

Scottish Environment LINK is the forum for Scotland's voluntary environment community, with over 35-member bodies representing a broad spectrum of environmental interests with the common goal of contributing to a more environmentally 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. Several LINK member organisations have direct involvement in the islands through the management of nature reserves, conservation and restoration of habitats and species, and investment in cultural and social amenities. LINK member organisations such as RSPB, Scottish Wildlife Trust, Woodland Trust and Bumblebee Conservation Trust are connected with the 13 islands within the scope of the National Islands Plan and contribute to protecting and enhancing islands' biodiversity through conservation efforts and engagement with local communities including agricultural advisory work, farm management and education for example.

Q5. If possible, please can you give us some examples of good local initiatives/projects/activities, etc.?

LINK member organisation's work on Scottish islands has been informed by a mix of projects funded through EU Life and other funding streams, where with the help of willing and engaged local partners and land owners, conservation work has been delivered to enhance island biodiversity. Below are examples of some of the successful projects:

- Habitat restoration and associated species: Conserving Machair LIFE+
- Conserving and enhancing bird populations: Shiant Isles Recovery Project, Western Isles Crofting for Wildlife Initiative, Uist Wader Project, Outer Hebrides Bird of Prey Trail, Sleeping with Corncrakes Initiative (Outer Hebrides), Orkney Corncrake Initiative, Orkney Native Wildlife Project, Northern Isles Landscape Partnership, Shetland Nature Prescriptions, 4Wild, Shetland Nature Festival, Biosecurity for LIFE Project, Kylerhea Sea Eagle Viewing Project, Marine Magic Education Project (Skye), Skye Grasslands for Corncrakes Scheme.
- Conservation projects for threatened butterflies and moths: Species Action Framework, and Argyll Islands species recovery programme.
- Peatland restoration with Butterfly Conservation's 'Bog squad' on Islay.
- Conservation projects for different species: Handa Island Wildlife Reserve and Isle of Eigg
- Conservation project for cetacean species: Isle of Lewis Risso's Dolphin Project
- Management of the UNESCO dual World Heritage Site of St Kilda.
- Safeguarding threatened bumblebee populations in the Outer Hebrides.
- Provision of a range of woodland creation resources for crofting communities: Croft Woodland Project

Q 6. The Islands (Scotland) Act lists a number of areas that are relevant for islands and island communities. Please rank these in order of priority for you, with 1 being the highest priority.

In response to this question within the consultation document we are not ranking the outcomes identified and listed for improvement within Section 3(3) of the Islands (Scotland) Act (hereafter referred to as the Act). This is because the outcomes (referred to as 'number of areas' in the consultation document) are interconnected. The ranking exercise also raises some questions, which are addressed below-

- **Absence of rationale in seeking a hierarchy of outcomes:** It is not clear why one outcome should be prioritised above any other, in number of areas listed. The listed areas relate to each other and cannot be prioritised as they are intricately linked. Despite this however, the consultation document is seeking a scoring for the list of outcomes. It is unclear how this

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scoring will be used. Additionally, it is also unclear whether this prioritisation exercise should be based on evidence and current need across the identified areas. The consultation paper document in relation to these outcomes' states that "it is crucial to note that this is not an exhaustive list." It is unclear, however, that if new data emerges post consultation, how that will be aligned to the current list, and whether the areas as identified in Section 3(3) of the Act will be prioritised.

- **Need to employ accurate terminology:** One of the areas listed in the consultation document is not accurately reflected in the consultation document. This is in relation to the list in Section 3(3) of the Act. Originally within Section 3(3) of the Islands (Scotland) Act 2018, seven main outcomes have been identified. Under outcome (b) improving and promoting, environmental wellbeing has been listed as a sub-outcome, in the consultation document this is now being referred to as environmental protection. Environmental protection is about protecting, maintaining and enhancing environmental standards¹. In contrast, to bring 'uniformity across legislation' the term natural heritage was replaced by environmental wellbeing during Stage 3 bill process of the Act. (Please see Q12 response for detail).
- **Holistic planning and delivery of outcomes:** Scotland is signatory to multiple international frameworks, including Sustainable Development Goals (SDG), Aichi Targets, Ramsar Convention and Paris Agreement. These translate to Scotland's commitments through 'Scotland Performs', Scottish Biodiversity Strategy and Climate Change (Scotland) Act 2009. These existing overarching, relevant and cross cutting policy mechanisms, should also underpin the delivery of the outcomes listed within the Islands (Scotland) Act 2018 (hereafter referred to as the Act) to achieve policy coherence and effective implementation of the National Island Plans and Island Communities Impact Assessments. To do this effectively, the relationship and interdependencies between different policy mechanisms and their relationship to the outcomes set in these plans should be mapped. For example, under the Nature Conservation (Scotland) Act (2004)², all public bodies in Scotland are required to further the conservation of biodiversity when carrying out their responsibilities. Additionally, the Wildlife and Natural Environment (Scotland) Act (2011)³ requires public bodies in Scotland to provide a publicly available report, every three years, on the actions which they have taken to meet this biodiversity duty. The first Biodiversity Scotland report from Scotland's Public Bodies⁴ which assessed the actions and reporting commitments of public bodies, highlighted that several organisations fell short of fulfilling their responsibilities. Given that the Scottish Biodiversity Strategy⁵ sets out how

¹ Currently there is no agreed definition of environmental protection in the Scottish policy context, however the Scottish Government Environment Strategy paper, seeks to develop a strategic approach to protect and enhance our environment, and this is guided by four EU environmental principles- polluter pays, preventative action, tackling pollution at source and the precautionary principle. https://consult.gov.scot/environment-forestry/environment-strategy/user_uploads/224042_sct0618871430-001_developing-an-environment-strategy-for-scotland-v3.pdf

² Nature Conservation Act (2004): http://www.legislation.gov.uk/asp/2004/6/pdfs/asp_20040006_en.pdf

³ Wildlife and Natural Environment (Scotland) Act (2011): <http://www.biodiversityscotland.gov.uk/duty/>

⁴ Biodiversity Scotland- Biodiversity Duty Reports from Scotland's Public Bodies: <https://www.nature.scot/biodiversity-scotland-biodiversity-duty-reports-scotlands-public-bodies-2015>

⁵ Policy Action: Scottish Biodiversity Strategy: <http://www.gov.scot/Topics/Environment/Wildlife-Habitats/biodiversity/BiodiversityStrategy>

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biodiversity will be conserved for the health, enjoyment and wellbeing of people in Scotland with biodiversity offering a range of services including wellbeing⁶, to deliver these multiple ambitions such as biodiversity duties and environmental wellbeing. It is suggested that a holistic approach is needed in carrying out responsibilities set within different overarching frameworks that lead to common goals. Therefore, following the above example, within the Island Communities Impact Assessment, the biodiversity duties performance of public sector organisations, which inform outcomes such as environmental wellbeing needs to be mapped and reported on, so that local authorities and other relevant bodies can deliver and demonstrate multiple public benefits effectively.

- **Due consideration to current climate and ecological crisis:** The recent IPCC 1.5°C global warming report⁷, highlights global impacts of a climate change induced temperature rise of 1.5°C as opposed to 2°C, where even an average rise of 1.5°C global temperatures will have severe impacts on nature and people. The LINK-WWF Scotland report⁸ highlights that Scotland's environment is also experiencing the effects of climate change and impacts are expected to be particularly severe should warming exceed 1.5°C. Bird species like Kittiwake with largest colonies in the east coast from St. Abbs Head to Shetland are rapidly declining as steadily rising sea temperatures are diminishing this species's food source, contributing to breeding failure. Machair is a globally iconic and unique habitat and is only found in northern and western Scotland, and the Hebridean islands and northwestern Ireland. This habitat hosts a very rich and unique wildlife, and climate is one of many pressures that threaten its future: a combination of coastal flooding, storms and increased winter precipitation levels could result in erosion and significant changes to vegetation cover. Further evidence⁹ also suggests that climate variability and extremes along with rising sea levels could have severe impacts on habitats and species, as well as land managers and local communities on the Scottish islands.

The recent IPBES report highlights the current ecological crisis¹⁰, where human action is threatening many species to extinction. 1 in 11 species in Scotland¹¹ are at risk of extinction, and Scotland's islands are home to significant numbers and diversity of species of national and international significance. The threats and drivers of biodiversity loss, identified in the report, are particularly prominent in island systems; invasive non-native species, land use change, the impacts of climate change on land and at sea in addition to island systems being isolated from mainland. Following the First Minister's declaration of a climate emergency¹² and the associated

⁶ Sandifer, *et al*(2015) Exploring connections among nature, biodiversity, ecosystem services, and human health and well-being: Opportunities to enhance health and biodiversity conservation, Vol:12, pp.1-15

<https://www.sciencedirect.com/science/article/pii/S2212041614001648>

⁷ IPCC Special Report on Global Warming of 1.5°C: <https://www.ipcc.ch/sr15/>

⁸ Scotland's Nature on Red Alert (2019): http://www.scotlink.org/wp/files/documents/Scotlands_Nature_Red_Alert.pdf

⁹ Angus, S. (2014) The implications of climate change for coastal habitats in the Uists, Outer Hebrides

¹⁰ Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES) Report (2019):

<https://www.ipbes.net/news/ipbes-global-assessment-summary-policy-makers-pdf>

¹¹ State of Nature Report (2016): http://ww2.rspb.org.uk/Images/StateOfNature2016_Scotland_1%20Sept%20pages_tcm9-424988.pdf

¹² BBC News (April 2019): Nicola Sturgeon declares 'climate emergency' at SNP conference:

<https://www.bbc.co.uk/news/uk-scotland-scotland-politics-48077802>

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ecological crisis, we believe that the outcomes listed in the Act for island communities should be defined by nature-based solutions which address the needs of island communities, improve island biodiversity and reduce greenhouse gas emissions.

Q11. How do you feel the National Islands Plan should address and respond to the distinctive geographical, natural heritage and cultural characteristics (including the linguistic heritage) of local island communities, including the needs of Gaelic speakers within those communities?

This is addressed in our response to Question 12.

Q12. What should be the main objectives for the National Islands Plan?

Scottish islands are home to fragile and unique ecosystems that are of international importance, and which underpin the social and economic development of communities. This fragility and uniqueness underline the need for specific and new designed plans to protect, restore and enhance island biodiversity and ecosystems. Nature-based solutions defined elsewhere by LINK¹³ – must be part of the solution in addressing the current climate and biodiversity crises. For the National Islands Plan to be able to contribute to the Scottish Government’s ambition of tackling climate and biodiversity emergencies, the Plan objectives should employ a nature-based approach. This should include:

- **Definition and scope of environmental wellbeing:** The term ‘environmental wellbeing’ has no recognised definition of the term despite being used in existing Scottish legislation, including the Community Empowerment (Scotland) Act 2015 and Scottish Crown Estate Act 2019. During Stage 3 process of the Act, John Mason MSP suggested the replacing the term ‘natural heritage’ with environmental wellbeing with the intent that both the terms meant the same and using the term environmental wellbeing would bring ‘uniformity across legislation’. However, this has never been clarified and both terms have different meanings. Natural Heritage (Scotland) Act 1991)¹⁴ defines ‘natural heritage of Scotland’ as ‘the flora and fauna of Scotland, its geological and physiographical features, its natural beauty and amenity’. For consistency and clarity, it is recommended that the definition of environmental wellbeing is included in the Plan, and explicitly includes the description of natural heritage as above. Additionally, ‘biosecurity’ has elements of economic, health and ecological wellbeing¹⁵ so that ‘enhancement of biosecurity’ should also be explicitly included within the scope of improving environmental wellbeing.
- **Consistency and hierarchy of policy:** Following Scotland’s responsibilities as a signatory to national and international biodiversity and climate commitments, and to build consistency across different policy ambitions, the Island Plan objectives should also reference and take into consideration the National Planning Framework, the Scottish Land Use Strategy, Scottish Biodiversity Strategy, Climate Change Plan, Climate Adaptation Programme and the National Marine Plan.

¹³Getting to net zero by 2045: capturing nature’s true potential for tackling climate change <http://www.scotlink.org/link-thinks/getting-to-net-zero-by-2045-capturing-natures-true-potential-for-tackling-climate-change/>

¹⁴ Scottish Natural Heritage: <https://www.legislation.gov.uk/ukpga/1991/28/part/I>

¹⁵ Dobson, *et al.* (2013) Biosecurity: the socio-politics of invasive species and infectious diseases

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- **Measuring performance of outcomes:** LINK welcomes the intent as set in the consultation paper that the Plan will include measures to record improvement of outcomes for island communities, through indicators. To evaluate the progress of outcomes, clear targets and associated indicators, need to be identified in line with commitments set within our national and international ecological and climate obligations. These include the Scottish Biodiversity Strategy, Climate Change (Scotland) Act 2009, UN Convention on Biological Diversity, Ramsar Convention, Paris Agreement and the UN Sustainable Development Goals.
- **Areas of focus for targets:** To address the outcome of environmental wellbeing specifically and associated outcomes listed in the Act, LINK recommends that the targets set within the plan should be prioritised to safeguard, promote and restore island ecologies. These areas of focus are:
 - Setting up of a Scottish island biosecurity strategy.
 - Recover and restore site conditions through effective management and monitoring of island protected areas: Ramsar, Special Protection Area (SPA), Special Area of Conservation (SAC), nature conservation Marine Protected Areas (ncMPAs) and Site of Special Scientific Interest (SSSI).
 - Incorporating nature-based solutions at the centre of island investments, to enhance local ecosystems, and enhance local community resilience in response to climate change.
 - Protect and enhance High Nature Value Farming and crofting, and sustainable marine activity.
 - The outer and Inner Hebrides are one of the last refuges for the Great yellow bumblebee (*Bombus distinguendus*) and Northern Colletes (*Colletes floralis*) in the UK. The Argyll Islands are home to some of the UK's rarest and most threatened butterflies the Marsh Fritillary. One of the objectives within Pollinator Strategy for Scotland¹⁶ is to make 'Scotland more pollinator-friendly, halting and reversing the decline in native pollinator population'. One of the outcomes within the strategy places a responsibility on public sector organisations to embed actions within relevant strategies, policies and practices. It is recommended island public sector bodies targets around environmental wellbeing should also include mapping of actions in relation outcomes set within the Pollinator Strategy.
 - Incorporate baseline monitoring measures of marine species in areas which are not being covered currently (specifically around Northern isles).
 - Raise awareness around the benefits of island natural heritage.

¹⁶ Pollinator Strategy for Scotland 2017 – 2027: <https://www.nature.scot/sites/default/files/2018-04/Pollinator%20Strategy%20for%20Scotland%202017-2027.pdf>

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Q13. What should be the key priorities for the Scottish Government in relation to the National Islands Plan?

- **Establishment and implementation of a Scottish islands' biosecurity strategy:** Invasive non-native species (INNS) refers to a species, subspecies or lower taxon, introduced (i.e. by human action) outside its natural past or present distribution; includes any part, gametes, seeds, eggs, or propagules of such species that might survive and subsequently reproduce¹⁷. These introduction events can occur either accidentally or intentionally. INNS pose a high and significant risk to biodiversity – to the extent that the Convention on Biological Diversity recognises INNS as the third greatest risk to biodiversity. The isolated nature of island ecosystems makes them very vulnerable to new introductions of non-native species which may have a negative impact on the economy, community health and environment¹⁸. Island ecosystems are less likely to have a presence of mammalian predators, therefore creating favourable conditions for ground nesting birds such as seabirds and waders. The introduction of the non-native species to island ecosystems can have a detrimental effect on local wildlife and people.

Non-native invertebrates such as the common wasps have colonised Orkney since 1986¹⁹, and it is understood they were accidentally brought through imported fruit. Numerous attempts have been made by the Environmental Services Department to eradicate common wasp colonies in Shetland, however these haven't been very successful as the nests are reported to them, and hence treated, which is after the new batch of queens have left. Additionally, the recent change in local weather conditions, such as colder winter with frequent snow, and warmer, sunnier summers have enhanced hibernation conditions for the insects. Common wasps now seem to have established a strong presence across Shetland's two main centres of population and continue to be pests to the people living in that area. Another non-native invertebrate that has impacted Scottish islands is the harlequin ladybird. Originally from Central Asia, this species was introduced to mainland Europe to control Aphids. This species has been spreading northwards through the British Islands and was sighted in Shetland 2012²⁰. While Shetland is thought to be too cold to support a population of harlequin ladybirds this indicates the species ability to disperse.

Scotland is home to over a third of Europe's nesting seabirds and their population declining due to numerous threats including ground predation by invasive species and climate change²¹. Biosecurity measures which keep sites free of invasive species like rats, stoats or mink through programmes like the Shiant Isles project, provide essential secure breeding habitats for seabirds. The timelines between the onset of an invasive species and its impact on the local ecosystems can be very short,

¹⁷ GB non-native species secretariat website: <http://www.nonnativespecies.org/index.cfm?pageid=64>

¹⁸ Balchin et al (2019): Biosecurity on St Helena Island – a socially inclusive model for protecting small island nations from invasive species:
http://www.issg.org/pdf/publications/2019_Island_Invasives/Balchin.pdf

¹⁹ Pennington *et. al.* (2004): The Common Wasp Colonisation of Scotland <http://www.nature-shetland.co.uk/entomology/wasps.htm>

²⁰ Miller(2012) Most northerly sighting on Harlequin Ladybird on Shetland <https://www.bbc.co.uk/news/uk-scotland-north-east-orkney-shetland-17156743>

²¹ RSPB: The Shiant Isles: a safe haven for Scotland's seabirds
<https://community.rspb.org.uk/ourwork/b/scotland/posts/the-shiant-isles-a-safe-haven-for-scotland-s-seabirds>

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which means the diverse biodiversity of the island ecosystems can be affected significantly in a very quick span of time²². There is a need to have biosecurity measures which includes prevention and early detection of new invasive species, and the ability to address any predator threats as they occur.

Native mainland species such as stoats and hedgehogs are non-native to Scotland's islands and can cause damage to ecosystems following their introductions. Orkney Isles are home to endemic Orkney vole, short eared owl, nationally important populations of hen harrier and curlew and internationally important seabird colonies. It is believed the incursion of stoats had a high impact on these bird populations. The Orkney Native Wildlife Project is working towards safeguarding Orkney's ecology by removing stoats²³. The Biosecurity for LIFE²⁴ projects are working towards safeguarding the UK's seabird island SPAs and to improve conservation measures, using a consultative and collaborative approach where conservation NGOs, communities, island managers and island owners are coming together to address biosecurity challenges through specific projects.

- **Measures supporting areas of national and international significance:** Scotland's protected areas (PAs) safeguard and enhance natural sites of national and international significance²⁵. Despite accounting for only 13% of Scotland's land area, the islands hold nearly 40% of the internationally important wildlife sites (European Natura 2000 sites and Ramsar wetlands of international importance) and nearly 25% of nationally important sites (SSSIs). The concentration of PAs on islands in relation to mainland is significantly and disproportionately high. In addition to the ecological benefits, improved conditions of the designated features of PAs is instrumental in enhancing and encouraging wider environmental wellbeing as these improve associated economic and social processes. Delivering outcomes on PAs also enables Scotland to effectively meet its international commitments including the UN Sustainable Development Goals and post-2020 Convention on Biological Diversity targets and deliver outcomes linked to Scotland's National Performance Framework.

Current data²⁶ indicate several island PAs are in unfavourable condition with no on-site remedy; most of these sites are those designated for breeding seabirds, for which climate change and associated marine ecosystem change are adversely affecting their status. The Plan should therefore include measures which address pressures on species and habitats, which give due consideration to:

- Completion of a well-managed network of marine PAs,

²² RSPB (201): Assessment of legislation supporting biosecurity in the Caribbean UK Overseas Territories & Bermuda <https://www.rspb.org.uk/globalassets/downloads/documents/conservation-projects/ukots-hidden-treasures/rspb-caribbean-ots--bermuda-biosecurity-legislation-report.pdf>

²³ Scottish National Heritage (2019): Orkney Native Wildlife Project: <https://www.nature.scot/professional-advice/land-and-sea-management/managing-wildlife/orkney-native-wildlife-project>

²⁴ Biosecurity for Life: <https://biosecurityforlife.org.uk/>

²⁵ LINK position paper on Protected Areas Working Group (PAWG) vision and strategic objectives for protected areas: <http://www.scotlink.org/wp/files/documents/A-Vision-for-Scotlands-protected-areas-network-LINK-response-to-PAWG.pdf>

²⁶ This includes all Scottish islands – a small number of which fall outside of the geographical remit of the Plan
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- Recognition of wider scope of effective biosecurity processes against INNS, including off site implementation.
- Adequate resourcing of site condition monitoring.
- **Incorporate climate mitigation and adaption measures:**
 - **Peatland Restoration:** The recent mapping exercise by RSPB²⁷ highlights that Scotland holds 65% of peatland areas in the UK that are of importance, both in the context of carbon sequestration and the relationship with biodiversity hotspots. The mapping exercise also highlights that the island peatlands, predominantly Lewis, Shetland and the Argyll islands have some of the highest carbon concentrations in the country, with extensive areas holding between 310-500 tonnes of carbon per hectare. Research indicates that 80% of Scotland's peatlands are degraded in some way²⁸. Degraded peatlands not only cause ongoing carbon emissions but also severely impact the biodiversity dependent on peat landscape⁷. The Committee on Climate Change (CCC), in its report²⁹ earlier this year highlighted that Scotland has the potential to achieve its greenhouse gas emissions reduction ambitions through nature-based solutions, the key area being peatland restoration. On peatlands alone, the Committee noted that 'there is potential to more than double the area of restored peatland from 0.6 million hectares today to over 1.4 million hectares by 2050'. Enhancing the resilience of Scotland's islands habitats will not only enhance the ability of our peatlands to be carbon sinks, but also improve our biodiversity.

Other measures which the National Islands Plan should consider are:

- Identify and support ways in which forestry and woodland ecosystems on islands can be enhanced to contribute to carbon sequestration.
- Identify, protect and enhance blue carbon stores such as kelp forests and sea grass meadows.
- Identify opportunities to strengthen implementation of Land Use Strategy.

Q15. How can we measure outcomes in relation to the National Islands Plan?

The Plan's objectives must be linked to targets that measure impact actions and that work towards the outcomes of the Plan and are not process oriented. The indicators identified and developed should be a set of island indicators. The indicators should also consider the current climate and ecological contexts, and the national and international biodiversity and climate change commitments, which are key elements of our rationale for defining the scope of environmental wellbeing (please see response to Q12).

²⁷ RSPB Map (2019): Nature helps our fight for a safe climate:

<https://rspb.maps.arcgis.com/apps/Cascade/index.html?appid=2b383eee459f4de18026002ae648f7b7>

²⁸ Bain *et al.*, (2011) IUCN UK Commission of Inquiry on Peatlands. IUCN UK Peatland Programme, Edinburgh

²⁹ Committee on Climate Change Report (2019) :Net Zero: The UK's contribution to stopping global warming

<https://www.theccc.org.uk/wp-content/uploads/2019/05/Net-Zero-The-UKs-contribution-to-stopping-global-warming.pdf>

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Q21. What should be the main objectives for Island Communities Impact Assessments?

To maintain consistency across legislation, and effective implementation, the Island Communities Impact Assessments (ICIA), should work in sync with the National Islands Plan, and the objectives should be defined by the scope of the National Islands Plan.

This response was compiled on behalf of LINK Wildlife Subgroup and is supported by:

Badenoch & Strathspey Conservation Group
Buglife
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National Trust for Scotland
Scottish Badgers
Scottish Wild Land Group
RSPB Scotland
Trees for Life
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