



Introduction

Scottish Environment LINK welcomes the previous Scottish Government's commitment to protect 30% of Scotland's land for nature by 2030 (known as '30 by 30').¹ Effective delivery of this target will significantly contribute towards tackling the nature and climate emergency. The recently published Biodiversity Intactness Index places Scotland at 212th out of 240 countries based on how much human activity has impacted nature.² Protected areas can play a key role in reversing that trend but how much will depend on whether 'protect' means genuinely effective protection of nature, includes the large-scale restoration of ecosystems and habitats, and is matched with a strategic nature-positive approach to managing land in the 70% of Scotland beyond protected areas. We hope that setting out robust, ambitious plans and funding for delivering 30 by 30 will be a priority of the new Scottish Government.

The UN Convention on Biological Diversity will consider adopting a target to protect 30% of the planet by 2030 later this year, a target that more than 50 countries around the world have already committed to³.

This is good news for nature, but only if protections are effectively implemented. Designation of 'paper parks' - protected in name only - will not lead to demonstrable improvements in biodiversity. Scotland has an opportunity to lead on this, by developing a plan to deliver 30 by 30 in a meaningful way.

Protected areas are proven to be effective for safeguarding nature⁴: they are the front line of defence against growing pressures from human activity and climate change and are vital for changing the fate of some of our most important species and habitats, when integrated into landscapes that are also well managed for nature.

There are currently over 1,800 protected areas for nature in Scotland, representing the best of our natural heritage and covering 18% of Scotland's land⁵. These protected areas consist of Sites of Special Scientific Interest (SSSIs), Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and Ramsar wetlands of international importance. Scotland's protected areas also help to protect many of the vital services that nature provides for people, as well as providing opportunities for education, tourism, recreation and scientific research.

Getting 30 by 30 right means learning lessons and ensuring that we do not have another lost decade⁶ for nature. First and foremost this means growing from what we already have, ensuring that nature is thriving across our existing protected areas and helping this network to expand. This is vital for the survival and recovery of important species and habitats.

The Scottish Government has also committed to remain aligned with the European Union and has legal powers to 'keep pace' with EU laws where possible in order to maintain or advance environmental

¹ <https://www.gov.scot/publications/scottish-biodiversity-strategy-post-2020-statement-intent/>

² <https://www.rspb.org.uk/globalassets/downloads/about-us/48398rspb-biodiversity-intactness-index-summary-report-v4.pdf>

³ <https://www.campaignfornature.org/home>

⁴ For example, Ridding, L.E., Redhead, J.W. & Pywell, R.F. (2015) Fate of semi-natural grassland in England between 1960 and 2013: A test of national conservation policy, *Global Ecology and Conservation*, Volume 4, July 2015, 516-525; Wilson, A.M., Vickery J.A., Brown, A., Langston, R.H.W., Smallshire, D., Wotton, S. and Vanhinsbergh, D. (2005) Changes in the numbers of breeding waders on lowland wet grasslands in England and Wales between 1982 and 2002 *Bird Study* 52(1), 55-69.

⁵ For a map of Scotland's protected areas see: <https://informatics.sepa.org.uk/ProtectedNatureSites/>

⁶ <https://www.rspb.org.uk/about-the-rspb/about-us/media-centre/press-releases/review-our-world/>



standards. The EU Biodiversity Strategy for 2030⁷ commits to legally protect a minimum of 30% of the EU's land area and 30% of the EU's sea area by 2030.

The EU Biodiversity Strategy also includes proposals to integrate ecological corridors, as part of a true Trans-European Nature Network, strictly protect at least a third of the EU's protected areas and effectively manage all protected areas, defining clear conservation objectives and measures, and monitoring them appropriately. The EU context is a clear, ambitious benchmark that Scotland can use to develop its approach to 30 by 30.

This briefing focuses on the Scottish Government's commitment to delivering 30 by 30 on land, but Scotland's seas are also in urgent need of stronger protection. Whilst Marine Protected Areas now cover 37% of Scotland's marine area, management measures are currently very limited and are unlikely to enable significant ecosystem recovery. Scottish Environment LINK is calling for a commitment to at least 30% of Scotland's seas being highly protected, at least a third of which are fully protected from destructive and extractive activities by 2030. For more information about LINK's position on 30 by 30 at sea, please see our Ocean Recovery Plan.⁸

Ensuring 30 by 30 delivers for biodiversity

Whilst the 2020 target⁹ for the extent of protected areas on land¹⁰ and sea¹¹ was met in Scotland not enough progress has been made on ensuring these protected areas are in a healthy state and connected.

Currently, around 65% of the species, habitats and geological features protected by these sites are in a good condition – this has dropped since 2007. The number of features that are recovering has increased, but it is not clear that species and habitats are recovering to a good condition within expected timescales and around 20% of designated features remain in poor condition. The top pressures affecting the condition of designated sites in Scotland are invasive species, overgrazing and water management.¹² Improvements in the condition of protected areas have stalled due to persistent cuts in funding for monitoring and management. More work needs to be done to ensure that our protected areas are joined up, bigger and better.

Budgets for site management and monitoring have suffered consecutive budget cuts. The number of features being monitored within each cycle of monitoring has significantly dropped as a result. The budget for SCM dropped from £975,256 in 2013/14 to £641,557 in 2017/18.¹³ As of February 2019 52% of all designated features on SSSIs in Scotland had no assessments undertaken in the past six years,

⁷ <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:52020DC0380&from=EN>

⁸ [OceanRecoveryPlan_spreads-1.pdf \(scotlink.org\)](#)

⁹ 2010 CBD [Aichi Target 11](#): *By 2020, at least 17 percent of terrestrial and inland water, and 10 percent of coastal and marine areas, especially areas of particular importance for biodiversity and ecosystem services, are conserved through effectively and equitably managed, ecologically representative and well connected systems of protected areas and other effective area-based conservation measures, and integrated into the wider landscapes and seascapes.*

¹⁰ <https://www.nature.scot/sites/default/files/2021-02/Scotland%27s%20Biodiversity%20Progress%20Report%20to%202020%20Aichi%20Targets.pdf>

¹¹ <https://www.gov.scot/news/protecting-scotlands-marine-environment/>

¹² [The Proportion of Scotland's Protected Sites in Favourable Condition 2021 | NatureScot](#)

¹³ [Parliamentary Question S51-21209](#) – answered by Mairi Gougeon on 06/02/2019



though some were subject to the Site Check Process. 21% of SSSI features had no assessment at all within that period.¹⁴

For 30 by 30 to be truly meaningful for nature, the focus must be on ensuring that new and existing protected areas are effectively managed to protect, maintain and recover the species and habitats that they are designated to protect.

In order to achieve this, a number of conditions must be met:

- Long-term legal protection for nature from damage such as pollution, over-exploitation, invasive species, habitat destruction and development.
- Management plans prepared and implemented for all sites, including actions to restore and recover degraded ecosystems.
- Effective monitoring of the important species and habitats in protected areas.
- Long-term funding and commitment to sustain restored ecosystems.
- Policy support, including relevant expertise to advise on site management and monitoring.
- Better use of enforcement powers.
- Robust new targets for improving the condition of protected areas.

What should count towards the 30%?

LINK's view is that in order to contribute towards the 30% target, areas must meet two conditions:

1. **Protected for nature in the long-term:** the entirety of the 30% should be afforded long-term protection for nature and long-term protection against damage including from pollution, overexploitation, invasive species, habitat destruction and development.
2. **Well managed and in good or recovering condition:** land and sea that count towards the 30% should be well-managed for nature and must be regularly monitored at appropriate intervals as part of a programme of active management and investment. This monitoring should show clear evidence both of good management for nature and that the land is either in good condition for nature or is showing demonstrable signs of ecological recovery.

Protected nature sites on land

As a starting position, the Scottish Government should aim to protect 30% of Scotland's land as: Special Protection Areas (SPAs), Special Areas of Conservation (SACs), Sites of Special Scientific Interest (SSSIs) and Ramsar sites. These four designations are the most important sites for nationally and internationally important wildlife in Scotland and are widely regarded to make up Scotland's protected area network, collectively covering c.18% of Scotland's land.

¹⁴ [Parliamentary Question S5W-21208](#) – answered by Mairi Gougeon on 06/02/2019



These designations have clear criteria for identifying and selecting suitable sites. Work should be undertaken to assess how many additional sites are known to already meet existing designation criteria and how far this would take the Scottish Government towards the 30% target.

This should include a clear route map for completing the existing networks of national and international sites, through a review of the SSSI network and implementation of the Third UK SPA Review recommendations. At present the SSSI selection process aims to notify a representative sample of the most nationally important nature sites - this should be expanded to include all sites that meet the selection thresholds.

If further investigation determines that Scotland does not have enough suitable sites to be designated as SSSI, SPA, SAC or Ramsar to reach 30% of land, then criteria should be developed to help identify further sites that meet the criteria of long-term protection and demonstrate positive management for nature. This could include

- Sites identified as important for biodiversity by national red lists
- NGO owned or managed nature reserves
- Private land restored for nature
- Other land restored for nature

These sites could only count towards 30 by 30 once the two key criteria of long-term protection and effectively managed to secure good or recovering condition are met. The sites listed would not meet those criteria in their current form. The Scottish Government should consider protecting these places through existing or new designations or other mechanisms that would meet the criteria.

Going further than 30 by 30

The international conversation about 30 by 30 has included calls for 10% of the planet to be 'strictly protected', with varying views on how that should be interpreted. The EU has committed to strictly protect at least a third of the EU's protected areas on land and at sea, including all remaining EU primary and old-growth forests. Exactly what constitutes 'strict protection' is still to be defined.

If the Scottish Government were to make commitments relating to strict protection on land, LINK would not support an approach that excludes people. We believe there are options for a special focus on areas of Scotland's land that could deliver substantial benefits to both nature *and* people. Policies concerning protected areas should embed principles of community engagement and empowerment and should follow the Scottish Land Commission's Land Rights and Responsibilities Statement. However, there may be a small number of nature sites where particularly sensitive and vulnerable habitats require additional protections from the pressures of recreation and disturbance.

The Scottish Government should commission research into the potential for going further than the commitment to protect 30% of Scotland's land, and set out different options for what this might look like in a Scottish context. Research should examine a range of options, including:

- Increasing protections of irreplaceable habitats in Scotland, such as Ancient Woodland, and their dependent species, to incorporate these areas into the statutory protected areas network.
- Exploring the potential for Scotland's National Nature Reserves to be revived as a core network of sites, owned or leased explicitly for the public benefit, that have the primary purposes of



protecting and restoring nature and ecosystems and connecting people to nature through environmental education, public contact with nature and sustainable recreation. NNRs could develop and showcase national exemplar standards.

- Any further levels of legal protection that could be provided to protected sites from damaging or extractive activities, beyond the protections afforded to European sites in Scotland, for example stronger guidance that protected areas are not an appropriate place for large-scale development.

The role of designated landscapes in supporting nature's recovery

There are a wide range of other designations across Scotland that have an important role to play in supporting nature's recovery through more sustainable land management. Designated Landscapes are areas protected for their scenic value, natural beauty, natural heritage or cultural heritage. In Scotland these include Scotland's two National Parks, 40 National Scenic Areas and 42 Wild Land Areas. These areas differ from protected nature sites in that they have not been identified solely, or in some cases at all, based on their importance for species and habitats. Not all designated landscapes have a statutory purpose to conserve or protect wildlife, though these landscapes do overlap with important nature sites. Designated landscapes have huge potential to deliver more for nature, climate and people.

Scotland's two National Parks are currently counted by the Scottish Government towards the extent of protected areas, bringing the area of land protected in Scotland to 22.7%. However, National Parks have a range of statutory purposes beyond nature conservation, including to promote the sustainable use of the natural resources of the area, to promote understanding and enjoyment and to promote sustainable economic and social development. National Parks also encompass a diverse range of diverse land uses, including urban areas.

Scottish Environment LINK therefore does not consider it appropriate that new or existing National Parks *in their entirety* should count towards the 30%. Only those areas within National Parks that meet criteria of long-term protection and demonstrate positive management for nature should count towards the 30%, this is likely to consist of protected nature sites within the National Parks.

However, Scotland's National Parks are well placed to make a substantial contribution to tackling the nature and climate emergency. Further research should be commissioned to:

- Identify which areas of the National Parks should count towards 30%
- Establish how well nature is faring within National Parks compared to the rest of Scotland
- Examine how existing and future National Parks can be transformed to deliver more for biodiversity and increase the area within the parks contributing towards 30%

It is Scottish Environment LINK's view that National Scenic Areas, Wild Land Areas and other landscape designations should not count towards the 30%, as they do not have a statutory purpose to protect and restore nature. Given the context of the nature and climate emergency, and the importance of healthy ecosystems to our economies and health and wellbeing, further exploration should be given as to how these areas can deliver more for nature and what legislative and policy changes may be needed to enable this change. The forthcoming Regional Land Use Partnerships could be one way to coordinate and agree actions for nature restoration within some of these landscape designations.



There are a range of other designations in Scotland that have some function of protecting biodiversity, including National Nature Reserves, privately protected areas managed by NGOs, UNESCO Biosphere Reserves and World Heritage Sites. However, the degree of protection and focus afforded to biodiversity varies enormously across these areas. Areas should only count towards the 30% if they met the criteria of long-term protection and positive management for nature.

Scotland's Nature Network and an integrated approach to managing land

Protected areas are a tried and tested tool for protecting nature. However, evidence also shows us that protected areas can only be effective if they are integrated within wider landscapes that are also managed in a way that supports nature. Protected areas need to be part of a wholesale transformation to the way that we use and manage land across Scotland. Without improvements to the sustainability of wider land use practices, protected areas become the 'last islands of biodiversity' in an otherwise nature-deprived landscape. Put simply, if we effectively protect 30% of land for nature but we are failing nature in the other 70%, then we stand no chance of halting and reversing the nature crisis.

Instead efforts must be made to deliver resilient ecological networks which tackle habitat fragmentation and ensure larger areas of good quality habitat, allowing species to move throughout Scotland's landscapes: this is Scotland's Nature Network.

Scotland's protected areas, managed appropriately to help nature recovery and strengthen ecological processes should form the backbone of Scotland's Nature Network, where existing areas of natural habitat are enhanced, new areas of habitat are restored and created, and land managed for other purposes is managed in a way that supports nature. To find out more please read our briefing on a Scottish Nature Network.¹⁵

Beyond Scotland's Nature Network land must also be managed in a more strategic, integrated and nature-positive way, ensuring that more land management minimises or avoids practices that damage nature and give back to nature. Scotland's Land Use Strategy and the forthcoming Regional Land Use Frameworks and Partnerships have a crucial role to play in delivering this integrated vision for Scotland's land, including helping to coordinate and deliver Scotland's Nature Network.

30 by 30 at sea

This briefing sets out how 30 by 30 should be delivered on land in Scotland. However, the targets being considered by the Convention on Biological Diversity will encompass both land and sea, and plans for delivering 30 by 30 on both land and sea in Scotland should be complementary.

Whilst the extent of Marine Protected Areas now covers 37% of Scotland's marine area, management measures are currently very limited and are unlikely to enable significant ecosystem recovery. Most of the MPA network awaits legal protection from the most damaging activities. For example, the MPA network protects less than 1% of the inshore seabed over which trawling has historically taken place. We must transform the network from simply protecting remnant pockets of less damaged or undisturbed seabed habitat to ensuring MPAs can actively contribute to marine ecosystem recovery.

¹⁵ <https://www.scotlink.org/wp-content/uploads/2020/03/Nature-Networks-Briefing-FINAL-Updated-Oct-2020-1.pdf>



Scottish Environment LINK is calling for at least 30% of Scotland's seas to be highly protected from damaging and highly extractive activities by 2030, with at least a third of that (10% Scotland's Seas) to be fully protected¹. The ecological, social and economic benefits of this approach would be enormous, ensuring long-term ocean resilience and allowing nature and people to thrive.

Scotland's Marine Assessment 2020 reveals that of the 31 MPAs assessed only 9 have achieved their conservation objectives and only 14 had specific measures to achieve their conservation objectives in place. Much more progress therefore needs to be made to ensure that MPAs are effectively managed and in a healthy condition. This must include completing all designations and management measures, particularly for fishing, for Scotland's MPAs and greatly recovering Priority Marine Feature extent and status outside the network.

Additionally, an independent commission should be established to advise on the developing MPA network, including reviewing network condition and resilience to climate change, transforming MPA management, and identifying sites needed to deliver ocean recovery, including fully protected zones within existing MPAs and new fully protected sites. For more information about LINK's position on 30 by 30 at sea, please see our Ocean Recovery Plan.¹⁶

¹⁶ [OceanRecoveryPlan_spreads-1.pdf \(scotlink.org\)](#)



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.

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