

LINK Call for Views Response

Response to Net Zero, Energy and Transport Committee call for views on the Scottish Biodiversity Strategy's first Delivery Plan
December 2023



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Scottish Environment LINK response

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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 organizations, enabling informed debate, assisting co-operation within the voluntary sector, and acting as a strong voice for the environment. 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.

Summary

Scottish Environment LINK strongly supports the creation of a new Biodiversity Framework for Scotland.

The draft framework represents a step change in the Scottish Government's ambition on tackling the nature emergency. All the policies included in the framework are vital elements of Scotland's response to the nature crisis, and many are things that environmental NGOs have been calling for over many years – this is a significant moment that we welcome. LINK therefore supports the direction of travel in the overall framework and many of the individual policies – it is in the detail that we see room for improvement.

The [State of Nature in Scotland Report 2023](#) findings show that Scotland, while still retaining precious and globally important wildlife, is also a highly nature-depleted country, following historic losses of species and habitats over centuries.

The recovery of nature is essential to safeguard the future of our societies and economies, as well as of the wildlife itself. This must now be acted on as an urgent priority. As a collective of environmental organisations, we believe that there is a fundamental and moral Imperative to save nature for its own sake. However, naturally diverse ecosystems support all life and without them, life on earth simply cannot survive. The pressures of climate change mean that our ecosystems need to be even more robust and resilient. The fact is they are neither.



We strongly support the following key elements of the framework in principle. We have outlined the action needed to ensure nature restoration:

The frameworks for 30x30 and Nature Networks. Protecting at least 30% of Scotland's land for nature by 2030 will be a vital part of nature recovery efforts. It is critical that these places are effectively managed and protected, and not just lines on a map.

Evidence shows that protected areas are most effective if they are integrated within wider landscapes that are also managed in a way that supports nature. Efforts must be made to deliver resilient ecological networks that tackle habitat fragmentation and ensure larger areas of good quality habitat, allowing species to move throughout Scotland's landscapes. 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.

Programme of Ecosystem Restoration and Species Recovery. LINK welcomes the outcome which commits to accelerating the restoration and regeneration of ecosystems. We need a comprehensive national programme to restore the places with our most important nature sites. We must see them protected and nurtured, and wider nature networks to be created so nature thrives everywhere. Species are the building blocks of our natural environment, but nearly half our species have declined since 1970. We need the Biodiversity Framework to include a national programme of species recovery targeted at helping threatened species to recover.

The actions that will have the most impact involve large scale ecosystem restoration across land and sea with committed funding and support not only in terms of the delivery but also as case studies for driving change and sharing knowledge. A key element of ecosystem restoration is reducing deer numbers and the actions on deer management represent the most "SMART" set of objectives in the draft Delivery Plan.

Proposals for legally binding nature restoration targets to drive cross-sector and cross-government action to tackle the nature crisis. Whilst we know much more needs to be done to tackle the climate emergency, we have seen how the Net Zero targets have led to climate change being mainstreamed into the consciousness of governments and sectors and seen as a priority. Without a similar approach for nature, we run the risk of a fragmented and insufficient, rather than unified and effective, response to the nature emergency.

LINK's [recent report](#) 'Nature recovery targets: Statutory targets to drive the recovery of nature in Scotland' sets out robust proposals for nature targets to be included in the Natural Environment Bill that would ensure the best possible outcomes for nature and people in Scotland. It highlights the need for strong, meaningful SMART targets to deliver real gains for nature, as well as statutory processes that will ensure we deliver on these targets. Scotland has a big opportunity to show leadership and make better progress to tackle the nature crisis.

Scotland's new National Park can lead the way on nature recovery whilst demonstrating the benefits at a local level. Scotland's National Parks already cover 7% of Scotland's land; therefore, inevitably they will play a major role in our efforts to tackle the nature and climate emergency. Almost 80% of the public want Scotland's National Parks to have a stronger focus on restoring nature and tackling climate change, according to an [opinion poll](#).

The existing Parks are already doing some great work, but it is critical that all of Scotland's National Parks take a leadership role in tackling the twin crises. For example, through demonstrating how deer management can deliver nature restoration at scale while providing local employment opportunities.



There must be a balance of local interest with national interest within the National Park. This includes working with communities to ensure they are not negatively impacted, for example through increased traffic, tourism numbers, housing development, or infrastructure development.

At this stage, we cannot say with confidence that if all these actions are added up, including their timescales, that this framework will take us to the 2030 and 2045 milestones.

The public is almost entirely absent from this plan until objective 6, with just a couple of references to raising public awareness or public engagement in the preceding action plans. Actions to re-connect people with nature and ensure the success of this delivery plan need to be embedded with all the actions set out in previous objectives to protect, restore and enhance nature at every level. Currently public participation feels like an added extra not a fundamental element of every other action.

Sufficient Funding for Nature

LINK welcomes the [2024 to 25 Scottish Budget](#) which recognises the urgency of investing in Scotland's environment and our environmental agencies, including NatureScot, now. Ensuring they are resourced to deliver vital, urgent and increasing roles in protecting and restoring Scotland's environment is welcome.

There remain challenges in the funding of other policy areas that impact the environment. The success of the Delivery Plan will depend on adequate resourcing for the responsible agencies.

More information can be found in LINK's [full response](#) to the Strategic Framework for Biodiversity consultation.

For further information contact:

Dan Paris
LINK Advocacy Manager
dan@scotlink.org



Scottish Environment LINK the voice for Scotland's environment

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