



**LINK COMMENTS ON SCOTTISH GOVERNMENT'S DRAFT BIODIVERSITY INVESTMENT  
PLAN  
August 2024**

**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.

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.

This response was written by LINK's Wildlife and Nature Finance Groups following the Scottish Governments engagement workshop on the draft Biodiversity Investment Plan (unpublished).

**Draft Biodiversity Investment Plan**

**General points:**

There are no timelines on any actions - all are urgent. We had hoped that some of these actions would have been completed as part of developing the Plan.

In order to provide a coherent approach, the Plan needs a system-led approach that understands the characteristics and ground rules of both ecosystems and financial systems and then uses that understanding to identify ways forward, in language that is accessible to experts in both fields.

It should first lay out the ecologically based approach to deliver Scotland's Biodiversity Strategy outcomes, including connectivity; then provide an overview of current and emerging mechanisms and what they should fund; then identify gaps and develop the policies, including regulation, that are needed to address those gaps.

The existing categorisation is not helpful. An alternative would be 'underpinning resources' - (actions 4, 5); 'enabling information / examples' (actions 1, 3, 8, 6); 'actual mechanisms' (actions 7, 9); and 'broader policy coherence' (action 2)..

Principles of being ecologically led as a route to high integrity green finance needs to be embedded throughout the BIP.

Lessons should be learnt from the carbon market, especially vulnerability of hosting organisation for codes if not a government body, potential for greenwashing, difficulties in monitoring, realities of timeframes,

The contributions that the compliance market can deliver through biodiversity enhancement



needs to be integrated to ensure that biodiversity enhancement is contributing to the delivery of the BIP.

The current Plan sees biodiversity as occurring in pockets and place-based and not something across our farmed and wooded landscapes which account for almost 95% of Scotland. Agriculture and forestry funding (which amounts to £650 million) must be made a central part of this plan.

The SBS committed to a Biodiversity Investment Plan which A) 'Provides a coherent overview of the range of known public and private (charitable, philanthropic, investment) funding sources for biodiversity restoration and B) Identifies funding gaps, and the potential new and existing funding sources to address these gaps.' The current draft needs to more explicitly articulate where the gaps are, and then link the actions to filling those gaps.

## Comments on specific actions

**Action 1 - Identifying and promoting the opportunity:** *Develop nature investment opportunity database and accompanying portfolio / map to help identify and promote the full range of biodiversity priorities.*

### LINK comments -

- Available information - use the Nature Network Toolkit and Nature Restoration Fund pipeline which is being developed plus others. See [NEN briefing](#) for landscape scale opportunity mapping and coordination.
- It needs SG / NS coordination and prioritisation based on ecological importance. It should be made available to companies seeking Biodiversity Enhancement related opportunities, noting that the policy context for BE is still in development in Scotland.
- Each local authority will be going through a process to map out their own Nature Network - any database should tie in to that process so that effort isn't duplicated.

**Action 2 - Mainstreaming biodiversity in funding and finance:** *Establish and implement biodiversity investment principles with a suite of guidance aimed at strategy, programme/project.*

### LINK comments -

- This is critical - currently perverse public subsidies are detrimental to biodiversity across land, fresh water and sea.
- This must extend to all public funding including grants, subsidies and loans.
- It should also extend to the granting of licences and permissions.

**Action 3 - Public sector leadership:** *Develop a programme of good-practice to increase capacity and confidence so that public sector can lead on nature-based investment.*

### LINK comments -

- It needs to include a requirement for public land to deliver for biodiversity and climate
- It needs commitment for long term, multi year public funding
- It should be ecologically-led.
- At sea, where projects may not be as well-developed as on land, public funding should be spent on creating the enabling conditions for marine ecosystems to recover.

**Action 4 - Biodiversity data hub:** *Identify options for establishing a biodiversity data hub that improves access and coordinates data to support better nature investment decisions.*



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#### **LINK comments -**

- Existing resources that can be used for this: NBN, SBIF, SEWeb; NS 30x30 data, JHI woodland opportunity mapping, Ancient Woodland Inventory, Native Woodland Survey of Scotland, Native Woodland Model of Scotland, Caledonian Pinewood Inventory See [LINK BAP consultation response](#) for details of data and data gaps.

**Action 5 - Nature finance skills and capacity building:** *Create a nature finance skills development programme.*

#### **LINK comments -**

- Include further education - business schools, courses in finance, accounting.
- Include engaging with accrediting bodies such that these skills are a requirement for professional accreditation.
- Include organisations that train school leavers or graduates such as ICAS in Scotland.
- Ensure ecological literacy is embedded and foundational in nature finance skills development programmes.
- This should include marine natural capital and the blue economy.

**Action 6 - Supporting 30x30:** *Scottish Government should review and implement mechanisms that speed up the commitment to meeting 30x30 for a range of actors.*

#### **LINK comments -**

- This should be linked to action 1, so that the pipeline of identified opportunities are prioritised such that 30 x 30 is met.
- This action needs to be much more explicitly about what finance will be required to meet 30 by 30, and then setting out where that finance will come from.

**Action 7 - Develop options for investing in biodiversity:** *Scottish Government to review and introduce options to help efficiently administer a range of funding and finance of biodiversity outcomes.*

#### **LINK comments -**

- This is central to the BIP and should be comprehensive and include all the sources of funding and what they are best suited to and how they could be combined to deliver Scotland's Biodiversity Strategy outcomes.
- It is important to think broadly. See [LINK's Paying for Nature - fiscal options](#) paper.
- This should include consideration of a national strategic pot of Biodiversity Enhancement contributions and the regulatory context for it to achieve ecological outcomes.

**Action 8 - Develop nature finance/market maps:** *Scottish Government to develop route maps for nature markets to support investment decisions and policy development.*

#### **LINK comments -**

- It is not currently very clear how this going to achieve its aims. It could be really helpful if the focus is on identifying which sources of finance are most suited to which SBS actions.
- How does it relate to the project pipeline action?

**Action 9 - Scottish Government to commission project on blended finance options for biodiversity.**

#### **LINK comments -**



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- This feels like a subset of Action 8 - each financial source needs an analysis of how it can best be functionally unlocked for biodiversity actions.
- A key issue not mentioned is time for return on investment - there is an incompatibility between what investors need and what biodiversity can deliver.
- There is a lack of explanation of what future biodiversity credit markets are going to be based on.

**Action 10 - Setting standards for biodiversity markets:** *Work with BSI on development of the Nature Investment Standards to ensure it is fit for purpose in Scotland and delivers the aims of the SBS.*

**LINK comments -**

- Regulations or policies in addition to BSI standards need to be considered if BSI standards are falling short of aspirations in Scotland. BSI plus additional policies will shape markets in Scotland.

This response was written by members of LINK's Wildlife and Nature Finance Groups and is supported by the following organisations:

Action to Protect Rural Scotland (APRS)

Froglife

Trees for Life

Woodland Trust Scotland

Butterfly Conservation

Amphibian and Reptile Conservation

Marine Conservation Society

Bumblebee Conservation Trust

RSPB Scotland

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