

## 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 organisations, enabling informed debate, assisting co-operation within the voluntary sector, and acting as a strong voice for the environment. Acting at local, national and international levels, 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.

### Question 1.

**Do you agree that all Ramsar natural features should be given the same level of scrutiny when assessing potential effects of any new plan or project by treating all natural features on Ramsar sites in the equivalent way to European sites for the purposes of the Habitats Regulations Appraisal process?**

**Yes**

**No**

**Unsure**

**Please provide any comments in support of your response:**

LINK supports a change in policy to give appropriate protection to Ramsar natural features and help ensure that Scotland complies with its responsibilities under the Ramsar Convention.

Ramsar sites are wetland habitats of international importance designated under the Ramsar Convention. Ramsar sites should be afforded the same level of scrutiny and protection as European sites. This equivalence is needed to maintain Scotland's international commitments, ensuring consistency with England and Wales, and safeguarding its environmental reputation. An independent expert review into the effectiveness of Scotland's marine protected area network in 2024 included this as a recommendation, as follows: "The Scottish Government should review the protection offered to Ramsar

sites so that they are offered protection that at least accords with their international status under the UK's treaty commitments"<sup>1</sup>.

As spatial overlap does not necessarily apply the higher protection standards of European sites to all features within that boundary, Scotland's compliance with the Ramsar Convention may be at risk due to a gap in environmental law.

NPF4 policy 4 states that 'all Ramsar sites are also European sites and/or Sites of Special Scientific Interest and are extended protection under the relevant statutory regimes.' This results in a two tier system with some features being protected under SSSI policy and some as if they were European Sites. There may also be instances where there are features which do not overlap either. It is important that Ramsar Sites and their features are protected in their own right and in a consistent way.

World Wetlands Day was celebrated on 2 February 2025, marking the date of the adoption of the Convention on Wetlands in 1971 and with the theme 'Protecting Wetlands for Our Common Future'. This policy change as proposed will reflect Scotland's ongoing commitment to the protection of these important wetland areas for nature and should be implemented as soon as possible.

**This response is supported by:**

Scottish Wildlife Trust  
Buglife Scotland  
Scottish Wild Land Group  
Bat Conservation Trust  
Nature Foundation  
Butterfly Conservation  
The Froglife Trust  
Badenoch & Strathspey Conservation Group  
Cairngorms Campaign  
Plantlife Scotland  
RSPB Scotland  
Action to Protect Rural Scotland (APRS)  
Chartered Institute of Ecology and Environmental Management

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<https://www.law.ed.ac.uk/sites/default/files/2024-02/Ensuring%20the%20effectiveness%20of%20the%20Marine%20Protected%20Area%20Network%20in%20Scotland.pdf>



Scottish Environment LINK the voice for Scotland's environment

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