

Scottish Biodiversity Strategy - Consultation Response

September 2023

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Summary of key themes

The consultation on a new Scottish Biodiversity Strategy sought the views of stakeholders on a strategic vision; high level milestones for the strategy, including indicative outcomes for 2045 and 2030 milestones; and conditions for success.

The consultation closed on 12 September 2022. There were 1,289 responses, of which 133 were from groups or organisations and 146 from individual members of the public. There were also 1,010 responses to one of two campaigns, one organised by the RSPB and the other by the Woodland Trust.

The main report sets out a question-by-question analysis of comments made. This summary sets out a number of cross-cutting themes highlighted by respondents. The focus is on broader issues that respondents are seeking to be addressed in the new strategy, including through the upcoming delivery plan.

1. The vision, and the wider strategy, should better reflect the urgency of the biodiversity crisis

There was a clear consensus that Scotland is in a biodiversity crisis and that tackling both the climate and biodiversity crises at the same time is vital, but also that the urgency and intent for biodiversity is not over-ridden by an emphasis on sequestering carbon. Respondents were concerned that the strategy does not appear to reflect the urgency of the response required given the scale and immediacy of the crisis faced.

The vision was thought to lack the depth and explicit ambition to inspire or motivate, with respondents looking for it to create a better collective understanding of what the strategy aims to achieve.

Reflecting the concerns around the urgency of the response required, some thought that both the 2045 and 2030 targets are too far off and that we need to act now. In particular, there were calls for the 2030 milestones to be brought forward and/or for intermediate milestones to be put in place. Conversely, there was a view that some of the 2030 milestones cannot be achieved within the 8-year period to 2030. It was suggested that early, intermediate targets or milestones are needed to initiate action and ensure progress is kept on track.

RESPONSE

The new strategy is clear that this is an emergency that requires an emergency response. The strategy sets out a long-term ambition and vision

for what good looks like for biodiversity in Scotland in 2045. The Vision encapsulates three core ideas: that urgent action is needed at scale across our land and seascapes; that we are looking to the future – regenerating biodiversity and building resilience to climate change; and that people and communities are central to a nature positive future.

2. The vision, outcomes and milestones should be SMART

A frequently-raised issue was that the current draft of the strategy lacks detail and that the vision, outcomes and milestones need to be SMART.¹ A SMART approach was seen as supporting both clarity and accountability; being able to measure and monitor progress, along the lines of the approach taken in the Climate Change Plan, was considered vital.

Respondents identified certain key requirements for a SMART approach, including moving away from the use of subjective language. They were looking for clear and consistent use of key terms. For example, it was suggested that phrases such as ‘restored and regenerated’ and ‘nature positive’ need to be explained, as does whether the number and diversity of species overall would be taken into account, or if the comparison would simply be with what was there before? In terms of ‘restoration’, whether this implies the reintroduction of species now extinct in Scotland was queried and it was suggested that we need to be clear how far back we are going if seeking to ‘turn back the clock’ on biodiversity and habitat loss.

There were concerns that there is currently no detailed biodiversity baseline in Scotland against which both gains and losses can be measured; a number of respondents stressed that robust baselines will be needed in order to establish a clear starting point. It was also suggested that a Scotland-wide biodiversity metric, similar to that in use in other parts of the UK, will be needed to ensure a consistent and robust approach. It was suggested that metrics must be accessible to those who are undertaking biodiversity-related work and should be designed so that it is easy to identify if improvements have been made.

More widely, it was suggested that a monitoring and evaluation framework should be an integral part of the strategy’s delivery plan, with a requirement for new or refreshed indicators, and for more frequent reporting of progress towards meeting targets. It was also argued that more research is needed to broaden the science information base for effective decision-making.

RESPONSE

The draft strategy published for consultation set out 33 priority actions to restore Scotland’s natural environment and halt the loss of biodiversity by

¹ Generally considered to be: Specific, Measurable, Achievable, Realistic and Time-related.

2030. These have now been incorporated into the delivery plan which is being consulted on as part of the Strategic Framework for biodiversity, and details the range of actions needed to deliver the outcomes and vision.

The proposed Natural Environment Bill will set out a new framework for statutory targets for nature restoration. This will form an important part of our Accountability Framework and drive action across Government. The Strategic Framework will also include an Investment Plan which will set out a cost estimate of the Delivery Plan actions and drive investment in their delivery; and a monitoring and reporting framework so we can monitor the effectiveness of our actions to meet key milestones.

A glossary of terms is included in the strategy.

3. The strategy should be aligned clearly with relevant international and domestic strategy, policy and legislation

There were also calls for the strategy to be better aligned with various international instruments and initiatives, including the draft targets of the UN Convention on Biological Diversity's (CBD) global biodiversity framework (GBF), the commitments in the Leaders Pledge for Nature, and the proposed EU Restoration Law. The last of these was connected to pledges to maintain or exceed EU standards. Respondents also thought that it would be helpful to be clear about how the vision complements the existing domestic landscape of net zero, the Climate Change Plan, the Environment Strategy and a broad suite of national sectoral plans and policies.

The Scottish Government's commitment to bring forward a Natural Environment Bill in 2023/24 was welcomed, with respondents also looking for a clear link to be made between this strategy and the forthcoming Bill, including around the targets that are expected to be included in the legislation. Respondents also felt stronger legislative support would be needed in certain areas such as: establishing and protecting nature networks; securing biodiversity gains through planning; and in freshwater management.

RESPONSE

The strategy has been amended to reflect the targets agreed at COP15. A final version will be published in due course alongside the delivery plan, which will set out in detail how we will deliver the actions necessary to set us on the path to the outcomes identified in the strategy, including using key policy levers across government that will guide our work to tackle the nature emergency in the coming years.

The Natural Environment Bill will contain provisions to put in place statutory targets for nature restoration that cover land and sea and a framework for setting, monitoring, and reporting on those targets. These targets, like our

climate targets, will form an important part of our Accountability Framework. They will drive action across Government towards reaching the overarching goal of this Strategy, of being nature positive - halting biodiversity loss by 2030 - and substantially restoring Scotland's natural environment by 2045. The targets will be achievable and challenging, developed in consideration of available evidence and through consultation. They are expected to include outcome targets that accommodate species abundance, distribution and extinction risk and habitat quality and extent. The targets will reflect the challenges of a changing climate.

4. Longer-term political commitment and mainstreaming will be vital

In terms of ensuring targets are met, many respondents highlighted that strategic leadership from the First Minister and Cabinet, as well as local government, will be key. There were calls for the finalised strategy to have cross-party agreement to ensure the vision is not affected by any changes to the political landscape.

Full integration and mainstreaming across other policy areas was also seen as vital; it was suggested that we are beginning to see this level of integration in relation to climate change, and that the same approach must be taken in relation to biodiversity. There were particular references to clear links to the Land Use Strategy, the Fourth National Planning Framework (NPF4), the Infrastructure Investment Plan and proposals under the Agriculture and Land Reform Bills. Respondents also highlighted links to the Just Transition and circular economy agendas. National Parks and local authorities were seen as potential key actors through Regional Land Use Plans, Local Development Plans and Local Biodiversity Action Partnerships.

It was also suggested that there is a need for new mechanisms to incentivise biodiversity action, balanced with stronger regulation, especially in relation to planning and development, and in the agriculture sector. Opportunities were also identified for innovative funding mechanisms and green finance to encourage private investment in areas such as payments for carbon offsetting, habitat restoration, climate adaptation and ecosystem services.

It was also seen as important that the strategy's delivery plan sets out specific priorities and measures to embed and support biodiversity policy implementation.

RESPONSE

The strategy sets out a three-tiered governance model which will strengthen accountability for delivery. The Cabinet Sub-Committee on the Climate Emergency will provide high-level oversight of the biodiversity strategy as a

political forum for ensuring biodiversity is mainstreamed across key policy areas and will review progress towards the statutory targets established by the Natural Environment Bill. A high level body will agree priorities, review and approve delivery plans and trouble shoot issues. This will be supported by an operational board who will oversee the delivery plan. An independent body will assess and report on progress towards meeting the statutory targets. Broad involvement with these bodies, including especially by delivery partners, will be crucial to their success.

Biodiversity is a key deliverable for our new fourth National Planning Framework and guidance is being developed to support that outcome.

Both public and responsible private investment in Scotland's natural capital will be essential to delivering on our climate change targets, the reversal of biodiversity loss and wider land use policy objectives. That is why we have established a public sector partnership with the aim to develop a values-led, high integrity market for responsible investment in natural capital in Scotland, as set out in our National Strategy for Economic Transformation (NSET).

5. The strategy should be reframed to focus on key ecosystems and species outcomes

There was some disagreement with framing the strategy by broad landscape types, including because there are many examples of inter-relationships between these landscapes. Some respondents called for a focus on key ecosystems for targeted action and restoration, with a vision for each habitat, highlighting the need to restore ecological processes and linkages. The Scottish Government's commitment to peatland conservation and restoration was cited as a good model that should be rolled out across other ecosystems.

There were also calls for greater reference to outcomes which address species loss as well as ecosystem restoration, including the need for a national programme of species recovery targeted at threatened species, and a commitment to monitor species in order to support existing and new monitoring schemes.

RESPONSE

The use of broad landscape types within Scotland's Biodiversity Strategy (SBS) encompasses key ecosystems, and considers keystone and protected species as part of these. We acknowledge that some actions focused on species, including a programme of species recovery, are required in the delivery plan for the strategy and this has been included. We are also committed in the strategy to revise the Scottish Biodiversity List. The SBS also needs to focus on restoring ecosystem health through restoring ecosystem functionality and resilience in the face of a changing climate. Species and

ecosystem health outcomes are not mutually exclusive and will be considered in conjunction through the adaptive actions to be outlined in the SBS delivery plans.

6. There should be a clear focus on tackling key drivers of biodiversity loss, including those that apply across habitat types

Respondents highlighted a wide range of drivers of biodiversity loss, including in relation to the specific landscape types and marine environments. Effects of climate change highlighted as drivers of biodiversity loss included increased water temperature and extremes of rainfall leading to either flooding or drought.

Respondents identified many challenges, but also opportunities, connected to reversing biodiversity loss and restoring and regenerating biodiversity.

Recurring themes included the importance of tackling:

- **Habitat destruction and degradation**; this was cited as a key driver of biodiversity loss across terrestrial and aquatic environments. For example, there was reference to loss of ancient woodland, removal of hedgerows and field margins, loss of riparian habitats, the drainage of wetland areas and moorland loss. Soil loss, degradation and sealing was also highlighted as a significant problem that needs to be addressed. In relation to the marine and coastal environments, there was reference to the destruction of seabed habitats, such as seagrass and maerl beds, and to development leading to the loss of sand dunes and machair. Damage to freshwater systems and habitats through excessive abstraction, straightening, canalisation and engineered solutions to flooding was also highlighted.
- **Habitat fragmentation**; there was reference to reducing fragmentation or improving connectivity of a mosaic of habitats at landscape and urban scales and to enhancing connectivity of habitats through rewilding, reforestation, restoration of rivers to a more natural state, and natural flood risk management. Nature networks were widely supported as a key component for improving ecosystem health and resilience across Scotland's rural and urban environments, with extensive suggestions for how these might be spatially represented and taken forward.
- **Species loss**; addressing species loss was seen as key, and there were calls for a national programme of species recovery that reverses loss of wildlife and allows our species to thrive. In particular, it was noted that levels of biodiversity loss are estimated to be far higher in freshwater than terrestrial systems. It was also suggested that there needs to be an element of dedicated species protection, with many species referenced. There were also calls for clear outcomes relating to species recovery and specific actions on keystone/threatened species.

- **Invasive non-native species (INNS) and disease;** the negative impact of INNS across our ecosystems was a frequently-raised problem, with specific references including to *Rhododendron ponticum*, Japanese knotweed, Sitka spruce, non-native flatworms, Signal crayfish and Zebra mussel. Many respondents also highlighted the ongoing impact of avian flu, including on our internationally important seabird population.
- **Pollution;** in relation to agriculture, there was reference to nitrogen/nitrate pollution from fertilisers and animal wastes. There were a number of references to marine, coastal and river pollution, especially from sewage and plastics. The detrimental impacts of noise and light pollution were also highlighted. Medicinal /pharmaceutical substances, over-use of herbicides in the urban environment and litter, were also among the types of pollutants referenced.

RESPONSE

We recognise the need to tackle the key drivers of biodiversity loss in order to meet our vision of halting biodiversity decline by 2030. The actions for addressing many of these drivers will be set out in the delivery plans for Scotland's Biodiversity Strategy (SBS). Within these it must be recognised that some of the drivers of biodiversity decline will be delivered by other policy mechanisms e.g. climate change via the climate change plan and water pollution by River Basin Management Plans. As noted above, it will be important that effective mechanisms are put in place to ensure that the need to secure positive outcomes for biodiversity is mainstreamed across a wide range of policy areas.

7. Addressing harmful practices, and promoting positive, nature-based solutions need to be a priority

Moving forward, many respondents stressed the importance of tackling unsustainable, damaging human activity although there was also emphasis on the need to recognise and support positive work that is already underway to support biodiversity, including among those managing the land.

A frequent theme was the need to tackle intensive agricultural practices, including by supporting farmers to identify and make the changes necessary for a transition to sustainable farming. There was also concern that uncertainty around policy and funding support can dissuade farmers and others managing the land from making changes that can benefit biodiversity; it was reported that post-Brexit uncertainty around farming support continues to be a factor and it was seen as key that the new agri-payment scheme supports biodiversity. The opportunity to improve recognition and support for crofting practices, and their unique position to deliver on biodiversity management, was highlighted.

There were also concerns about the impact of land management practices in upland areas. The acknowledgement of deer range and grouse moor management as land uses supporting positive change in upland areas was welcomed by some respondents, while others questioned whether successful restoration of upland areas can be compatible with muirburn. In a similar vein, while the importance of sustainable deer management was recognised there was also a view that the current approach to species management is overly focused on reducing deer numbers and that there should be greater consideration of the impacts on upland areas of other herbivores, including sheep.

In relation to forestry, respondents thought that the differences between woodland managed for timber production or for biodiversity should be acknowledged and that it will be important to determine the priorities for new tree planting in relation to timber production, carbon sequestration and biodiversity. Some respondents highlighted the importance of avoiding large areas of monoculture and of developing mixed species stands with varied age structure to provide continuous cover.

There were considerable concerns about the impact of past and current fishing practices on the marine and coastal environments, and in particular about sea bed disturbance caused by bottom trawling; it was reported that large areas of the Scottish seabed are being subject to repeated disturbance. There were calls for the re-establishment of an inshore limit on bottom-towed fisheries and for more Marine Protected Areas to be created. Prioritising low-impact, non-destructive fishing practices was seen as the way forward.

There was broad agreement that the focus going forward needs to be on mainstreaming nature-based solutions, including around mitigating the impacts of climate change, the protection of existing species and habitats and the restoration of habitats, including woodlands, peatlands, wetlands and marine habitats.

The potential of nature-based solutions for habitat creation in the freshwater environment was highlighted, as were opportunities for natural flood management in both rural and urban areas. There were also calls for an holistic approach, as nature-based systems on farmland are key to successful freshwater outcomes. The role of River Basin Management Plans was highlighted, with views both that these provide a key mechanism for delivering change and that they were not designed to report on biodiversity restoration.

Green and blue infrastructure were seen as nature-based solutions having the potential to increase biodiversity and influence and benefit a large proportion of the population in urban settings.

In terms of coastal erosion, it was suggested that we need to accept that regular coastal erosion and accretion will lead to necessary retreat from some

coastal fringes. However, there was also a view that some communities may require hard-engineered flood defences.

Improving our understanding of which interventions will have the most beneficial impact on biodiversity was seen as key, and there were calls for more sharing of good practice examples around nature-based and green infrastructure interventions.

RESPONSE

The SBS identifies and recognises the harmful practices that impact on Scotland's biodiversity. It places investment in nature based solutions as a key principle for addressing these harmful practices so that the vision of the SBS and Scotland's Net Zero ambition can be realised together. The actions we will take to promote nature based solutions and address the harmful practices that currently impact upon biodiversity will be outlined in the delivery plans for the SBS.

8. We need to focus on building commitment and buy-in across all stakeholders, including the general public

The importance of engaging all stakeholders and key decision makers in order to build consensus and ensure biodiversity strategy and policy is mainstreamed was highlighted. It was suggested that we need a better understanding of how key stakeholders will be engaged, included, consulted and informed of developments; there was a call for good practice guidance to be developed. Local Place Plans, community land asset transfers and Local Biodiversity Action Partnerships were highlighted as mechanisms for engaging people with biodiversity.

Support to enable stakeholders to make the required changes was also seen as key. The acknowledgement of the importance of funding was welcomed, and a number of respondents highlighted the important role that resourcing will play. It was noted that delivery planning for the strategy will be crucial to its success but will be challenging, with potentially difficult choices with respect to which actions are prioritised. One suggestion was that there needs to be support for community-level approaches to reconnect people with nature. Recognising the importance of social and economic factors, including around supporting the rural economy through green jobs and wildlife tourism, and creating and preserving a skilled workforce, was seen as central to the success of the strategy.

There was agreement that a widespread consensus on the importance of tackling biodiversity loss and climate change, including among members of the public, will be key. It was seen as important that people and communities across Scotland feel connected to the strategy, understand the issues and are

able to make their own contributions to its targets and share in its successes, including economic, health and wellbeing benefits, with a range of novel approaches suggested.

It was suggested that accessible communication and consistent messaging will be key to changing attitudes and behaviours, including the consumer choices that positively impact wider environmental sustainability, and that we need to achieve the same level of buy-in in relation to the biodiversity crisis as appears to have been achieved in relation to net zero.

RESPONSE

Both the strategy and delivery plan are being co-developed with stakeholders. Delivery plans will set out a participatory and inclusive 'whole-of-society' approach that engages: a wide range of delivery partners including local authorities and non-governmental organisations (NGOs); local communities; business, especially land and water-based businesses; and the scientific and research community. They will be inclusive, engaging and empower stakeholders and communities through local and regional institutions.

In addition the strategy commits to a programme of public engagement to increase understanding of the nature of the biodiversity crisis and the drivers of loss including those associated with peoples' consumption and production choices. Leading through our Curriculum for Excellence, we will mobilise our whole wider education and skills development system to promote increased understanding of our relationship with nature and positive action to secure its sustainable use.



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