

## Written submission from Scottish Environment LINK

### Scotland's progress towards domestic and international biodiversity 2020 targets

Scottish Environment LINK is the forum for Scotland's voluntary environment community, with over 35 member bodies representing a broad spectrum of environmental interests with the common goal of contributing to a more environmentally sustainable society. This briefing sets out to highlight LINK member views on Scotland's progress towards meeting biodiversity targets and halting biodiversity loss.

#### PROGRESS TOWARDS INTERNATIONAL TARGETS

We welcome the Scottish Government's commitment to reporting on progress towards the 2020 Aichi targets and work undertaken to produce the recent SNH report. It is important to have a clear understanding of ambitions, actions underway and progress to date. However, we are disappointed over the lack of progress. It is critical to refocus efforts and pursue urgent actions to make progress ahead of the 2020 Aichi deadline.

As the SNH report notes, out of the 20 targets that Scotland is committed to meeting in less than two years, only 7 are on track. For 12 targets progress is insufficient and "unless we increase our efforts the target[s] will not be met by [the] deadline", according to the report. The remaining critical target that tracks available financial resources, which are key to delivering many of the other targets, is falling, meaning that we are moving away from the target. The report highlights that "total funding figures for most of the Scottish organisations that have some biodiversity remit have also declined in the last 5 years".

We are particularly concerned about the substantial deviation from biodiversity funding targets which comes alongside a number of other issues as detailed in the section below.

Looking at other indicators, the report states that:

- **A2 – Biodiversity values integrated:** whilst challenges remain, "biodiversity values have been integrated into the mainstream planning, policy and reporting frameworks". The ongoing scrutiny of the Public Audit and Post-Legislative Scrutiny Committee of biodiversity reporting duties indicates that considerable action is needed to fully embed biodiversity not only in terms of reporting but also in terms of appropriate action.
- **A3 – Incentives reformed:** "there are incentives for activities which conflict with biodiversity leading to its deterioration and sometimes loss". It is unclear how the Scottish Government aims to address these areas of concern; these issues are amplified in the context of the UK's exit from the EU and potential for CAP reform.
- **A4 – Sustainable consumption and production:** "current indicators show we still have work to do to ensure the economy is operating within safe ecological limits". This has been an ongoing concern that LINK members have raised in a variety of fora. In this context, the Scottish Government's resistance to include "sustainable development" as the overarching purpose of the National Performance Framework is particularly puzzling given Scotland's commitment to

meeting the UN Sustainable Development Goals. Similar concerns are raised in the context of sector specific strategies such as in the case of aquaculture.

- **C11 - Protected areas increased and improved:** LINK members agree that “more work is still required on management, representativeness, integration, and connectivity of sites”. Monitoring accurately and reflecting transparently on monitoring data is critical. Despite the protected nature sites national indicator increasing, there are significant issues with how the data is reported under the indicator: an increased proportion of ‘unfavourable’ features are re-categorised as ‘unfavourable recovering due to management’ and are therefore summarised as favourable under the national performance indicator, without evidence of actual recovery or delivery of management measures on the ground. It is important to note that SNH reports that “79.7% of Scotland’s natural features on protected nature sites are either in or recovering towards a favourable condition”; this reflects a 0.6 percentage point decrease since last year and differs to the “over 80%” figure used in the Aichi report<sup>1</sup>.

With respect to the progress made against several targets, we are concerned that this seems to be focused on process rather than action directly linked to better environmental outcomes on species or habitat conservation and restoration (for example, indicators B5, B7, B10, C12, as well as indicators under funding). While the generation of indicators, data and other information is important, this must not be confused with improvements in biodiversity. We therefore welcomed the statements by Cabinet Secretary Roseanna Cunningham that there should be a focus on environmental outcomes and look forward to better understanding what actions are envisaged by Scottish Government and the relevant timeframe. At the moment, there is no indication about what are the additional actions that SNH and Scottish Government will take across all its departments to bridge the emerging gap between targets and the Scottish status quo.

It is also important to note that while the Aichi report makes some links with action outlined in the “Scottish Biodiversity: Route Map to 2020” most of the priority actions rely on partnership working and external funding. The focus on specific projects does not allow provide for long-term strategy and support for different targets and goals.

Biodiversity governance mechanisms will also need to be revisited and strengthened in particular to ensure adequate representation and participation by environmental charities.

## **BIODIVERSITY REPORTING DUTIES**

We welcome the work of the Public Audit and Post-legislative Scrutiny (PAPLS) Committee on the operation and reporting of the biodiversity duty. LINK members have provided both written and oral evidence and are encouraged by the Committee’s ongoing interest. As indicated in our submissions, there are a number of actions, both legislative and non-legislative, that should be considered in order to support public bodies in delivering their biodiversity and reporting duties. The Government has provided Guidance which while helpful has not provided public bodies with enough clarity on how to meet their biodiversity duty, particularly with respect to the aspect of “mainstreaming”. We believe that making clearer the type of

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<sup>1</sup> <https://www.snhpresscentre.com/news/statistical-news-release-the-proportion-of-scotlands-protected-sites-in-favourable-and-recovering-condition-2018>

actions the duty would prescribe to meet Scotland's biodiversity ambitions could be delivered through better implementation and very targeted legislative change.

We hope that the PAPLS Committee work on the biodiversity duty can be taken into account in ECCLR deliberations on Scotland's progress towards biodiversity goals.

## **DIMINISHING FUNDS FOR TACKLING BIODIVERSITY LOSS AND CONSERVATION**

As the Committee has noted in the past, there is a concern about the level of funding for biodiversity and the overall drop in funding over several years. This comes as other pressures on funding for biodiversity are becoming more prominent:

- Revision of SNH grant mechanisms:
  - Framework agreements: while only larger environmental charities were able to benefit from those agreements, they originally allowed for large-scale and more strategic support on a more long-term basis (initially over a period of 3 years, most recently reduced to yearly arrangements). These were focused on conservation and habitat and biodiversity restoration. These have been now discontinued and will be replaced by a series of challenge funds where biodiversity is relatively absent.
  - In addition, SNH grants are now increasingly focusing on the delivery of a number of further goals beyond conservation. Specifically, there are requirements for engaging with youth as well as disadvantaged communities. While these are laudable objectives, we cannot afford to take away from the core purpose of these funds which is conservation of our natural heritage. Moreover, very often SNH grants will require engagement in Scotland's central belt, however, this limits possibilities for rolling out projects in more remote areas where vulnerable habitats and species reside.
- Uncertainty regarding the future of dedicated environment EU funding mechanisms such as LIFE creates further concern. Since its inception, LIFE has funded over 25 projects supporting among others Atlantic salmon, the freshwater pearl mussel, the red squirrel, Caledonian pinewoods, the porpoise as well as many others and bringing in well over £25m for conservation delivery – 21% of the UK total.
- Ongoing lack of funds for Scotland's nature: according to a report put together by the Scottish Environmental Funders' Network Scotland<sup>2</sup> is at a considerable disadvantage compared to the rest of the UK in terms of attracting funding for conservation projects. From 2012 to 2015, private foundation funding for environmental causes in England and Wales amounted to 20 times as much as that available in Scotland. This is equivalent to £768 per square kilometre in England and Wales versus £70 per square kilometre of Scotland.

Given this context, it is unsurprising that we are moving away from the Aichi target on financial resources for biodiversity.

With growing pressures on dedicated budgets for conservation, it is important that we avoid a situation where dedicated funding for biodiversity is used to deliver a variety of diverse goals. Over the last few years, SNH has increasingly focused efforts on awareness raising and engagement with people as a way of recognising

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<sup>2</sup> <http://www.scotlink.org/link-thinks/funding-scotlands-environmental-future-challenges-and-opportunities/>

the multiple benefits of nature to our well-being. However, it is unclear to LINK whether recognition of the wider benefits of our natural environment has elicited financial support from relevant portfolios. For example, given the contribution of our environment to our health and wellbeing, it would be possible to envisage dedicated funding from the social policy portfolio to support the delivery of those benefits.

### **POST-2020 BIODIVERSITY STRATEGY**

While progress needs to be made ahead of 2020, it is equally important to start a discussion about the need to refocus efforts post-2020 and develop a robust strategy that looks at biodiversity concerns within a wider policy context and addresses funding pressures. LINK members believe that the introduction of a National Ecological Network (NEN)<sup>3</sup> in line with Scottish Government commitments in Scotland's Biodiversity - a Route Map to 2020 and the National Planning Framework, would be a helpful framework for such discussions.

While scientific evidence and academic literature overwhelmingly supports the introduction of an NEN to benefit not only our environment but also our wellbeing and economic prosperity, there has been little progress in its roll-out in Scotland. The NEN would help protect and restore Scotland's nature, so that it continues to provide the life support systems we all depend on, particularly in terms of our health, wellbeing and economic prosperity. It could do this by providing an overriding, holistic policy approach that integrates the enhancement and protection of nature into policies, proposals and funding streams, so that they can deliver multiple public benefits more effectively.

We would welcome further work, including a potential inquiry, from the ECCLR Committee on post-2020 biodiversity ambitions. Launching such a piece of work would help promote this much needed debate.

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<sup>3</sup> <http://www.scotlink.org/public-documents/a-roadmap-for-adopting-a-national-ecological-network-for-scotland/>