



The Scottish Parliament
Pàrlamaid na h-Alba

Roseanna Cunningham
Cabinet Secretary for Environment,
Climate Change and Land Reform

c/o Clerk to the Committee
Room T3.40
The Scottish Parliament
Edinburgh
EH99 1SP

By email only

(RNID Typetalk calls welcome)

Tel: 0131 348 5240

ecclr.committee@parliament.scot

25 November 2016

Dear Roseanna

Environment, Climate Change and Land Reform Committee Inquiry into Biodiversity Progress to 2020

I am writing to you following the Environment, Climate Change and Land Reform (ECCLR) Committee evidence session on Tuesday 1 November¹ to explore Scotland's biodiversity progress to 2020.

This session follows previous parliamentary consideration of Scotland's Biodiversity Strategy, by the Rural Affairs, Climate Change and Environment (RACCE) Committee, in Session 4.

In reviewing progress towards the six big steps for nature, 14 targets and 12 priority projects, underpinned by 79 actions set out in the 2015 Scotland's Biodiversity – A Route Map to 2020, the Committee explored the views of stakeholders on the recent reports –

- **Scotland's Biodiversity – A Route Map to 2020 First Progress Report 2015/16 - the first annual review of the Route Map to 2020.**
- **Scotland's Biodiversity Progress to 2020 Aichi Targets Interim Report 2016 - provides an interim assessment for 13 of the 20 targets, and**
- **The State of Nature Report 2016 and the associated State of Nature in Scotland (SoNS)**

In considering the recent reports and evidence from stakeholders the Committee note that there are areas of potential conflict between the findings of the reports and we have significant concerns in relation to Scotland's progress in a number of areas. These are set out below. Our view on the first

¹ Environment, Climate Change and Land Reform Committee, [Official Report](#), 1 November 2016

Progress Report, progress within each of the priorities and identified areas of concern are detailed in the annexe to this cover letter.

Progress to 2020

The SNH report appears to be broadly confident that Scotland is “on track” to meet its targets. However the new international targets (Aichi and EU) call for a “step change” in efforts to halt the loss of biodiversity and to restore essential services that a healthy natural environment provides.

The SoNS report notes that “systematic monitoring of changes in Scotland’s natural environment has only been undertaken relatively recently and only for a small proportion of species. In spite of the lack of information, an assessment of the loss of nature due to human activity over the centuries (known as the Biodiversity Intactness Index (BII)) has rated Scotland in the lowest fifth of all the countries analysed, giving “great cause for concern”.

The evidence the Committee heard supports the view that while the efforts to protect and support biodiversity in Scotland are delivering to some extent, the reality is that they do not go far enough to fully meet the challenge and the Scottish Biodiversity Strategy in itself will not be enough to deliver the Aichi targets, particularly when set against the challenges of climate change. We heard that one in 11 species in Scotland is at risk from extinction and 65 species are critically endangered. We also heard that there is a severe decline in natural capital, particularly in the uplands and in agricultural areas. **The Committee are concerned that the progress reported does not represent the necessary step change in efforts needed to halt the loss of biodiversity in Scotland.**

The Committee note the apparent contradictions between the findings and the tone of the first annual review of the Route Map and Interim Report on the Aichi Targets and the State of Nature Scotland (SoNS) Report. **The Committee would welcome your view on this issue.**

Policy framework and reporting structure for biodiversity

With the initial biodiversity strategy (Scotland’s Biodiversity: It’s in Your Hands) published in 2004, followed by the updated Challenge Strategy in 2013 (2020 Challenge for Scotland’s Biodiversity), the Routemap in 2015 (Scotland’s Biodiversity – A Route Map to 2020), the two most recent progress reports (Scotland’s Biodiversity: A Route Map to 2020 First Progress Report 2015/16, Scotland’s Biodiversity Progress to 202 Aichi Targets Interim Report 2016), and the forthcoming three-yearly Scottish Biodiversity Strategy Progress Report, as well as statutory international targets (and their associated reporting structures) there is a multi-layered and complicated policy framework for biodiversity restoration and enhancement.

The Committee heard that the number of strategies and their lack of “join up” has resulted in a lack of clarity over the strategic purpose and therefore in a lack of clarity in the approach for those tasked with delivering a “step change” for biodiversity in Scotland. **The Committee would welcome your response to these concerns and would welcome your view on the role of the Land Use Strategy in bringing this work together.**

The Committee also heard that the “join up” between the various parts of Government is an essential part of the Scottish Biodiversity Strategy but the overarching high-level strategy group has not met for some time (we have been told that it may have been a year or more since the last meeting).

The Committee are extremely concerned to hear that the Strategy Group has not met for some time and consider that there is a lack of top down direction. The Strategy Group should be the key driver and point of engagement with the process and it is critical that different parts of Government and Government Agencies proactively engage and collaborate on the challenging issues. We would welcome further information as to the current and future role, priorities and meeting schedule of the Strategy Group.

Information and Monitoring

The Committee heard that the habitat map of Scotland is still outstanding and there may be further delays to its publication. **Given the significance of this as a crucial inventory we would welcome an understanding of the cause of this delay and confirmation of the timescale for its completion and publication.**

The Committee also heard that there is a need for the development of a full range of ecosystem health indicators in order to understand Scotland's progress with the Aichi targets and biodiversity strategy. **The Committee share this view and urge the Scottish Government to prioritise development of these indicators. We look forward to receiving an update on progress from you on this key area.**

Implications of leaving the European Union

We explored the opportunities and threats to biodiversity and the natural environment of leaving the EU and heard that although there may be benefits, these may be few. We particularly heard concerns in relation to the future funding of protected areas and the significant impact on research and academic funding.

The Committee would welcome the Scottish Government's assessment of the environmental implications of leaving the European Union and the key issues for Scotland, including the future funding of protected areas and of research and development, and looking ahead, how Scotland can ensure the growth of high nature value farming and support cross compliance mechanisms.

The Committee would also welcome your view of the potential impact of the World Trade Organisation rules following Scotland's exit from the EU – specifically how these might restrict funding to Scotland's farmers and crofters in their activities to support the environment and promote biodiversity.

The Committee would welcome an early response from you on the issues raised in this letter and in the attached annexe and we look forward to considering the three-yearly Scottish Biodiversity Strategy Progress Report which we understand will be laid before Parliament early in the New Year.

Yours sincerely,

A handwritten signature in dark ink, appearing to be 'Graeme Dey', with a stylized flourish at the end.

Graeme Dey MSP

ANNEXE - ECCLR Committee views on progress within the First Progress Report Priorities

Priority 1 – Restoration of Peatland

The progress report states that there is an ambitious peatland restoration programme underway, contributing to the EU 15% degraded ecosystem restoration target. In particular, peatland restoration in the Flow Country is considered to be “setting an international benchmark for good practice”, and progress is considered to be “on track”.

However, the SoNS notes that restoring functioning blanket bog is a long-term process and results to date are preliminary – “However, the oldest restoration areas show that water levels can be successfully restored across large areas, which is associated with habitat recovery, at least in the flatter areas which retain moisture more easily. However, some areas, such as those on steeper ground or on top of furrows that were ploughed to increase drainage, are recovering more slowly. These areas may also require further management, such as targeted blocking of the furrows or re-profiling”.

The Committee heard from stakeholders that although there has been some good progress on peatlands we need a greater ambition to reach the target of 21,000 hectares a year of peatland restoration to support the achievement of our climate change targets. We also heard that to achieve this target a long term and sustained funding stream is essential to support land managers alongside a programme of practical advice and education to encourage peatland restoration.

The Committee also heard evidence on the current pressure from pension and investment companies on forestry investment which is looking to push the Forestry Commission to move from the current planting guidelines to planting on a 50cm peat layer.

The Committee consider that the issues in relation to peatlands highlight the importance of ensuring that we have a fully functioning land use strategy in Scotland to ensure effective land use decisions that support Scotland’s climate change aspirations.

Given that results to date are considered to be preliminary by the SoNS report we would welcome a view from the Scottish Government as to whether it reasonable to consider this priority project to be “on track”. In particular, the Committee believe that further action out-with the Flow Country is required and the apparent lack of funding and engagement from landowners/managers needs to be addressed.

The Committee are concerned to ensure that there is an ongoing funding commitment to support peatland restoration. We recommend the Scottish Government: undertake an analysis of future funding requirements; set out a five year funding projection; provide certainty of funding for that period; and establish a programme of practical advice and education to support land managers and encourage peatland restoration.

On the issue of the action of pension and investment companies in relation to forestry, the Committee encourage the Scottish Government to explore whether this is happening in practice, and, if so, recommends

that the Scottish Government send a strong message that this approach will not be countenanced.

Priority 2 – Restoration of Native Woodlands

The Biodiversity Strategy aims to create 3,000 - 5,000 hectares of new native woodland per year, and restore approximately 10,000 hectares of native woodland into satisfactory condition in partnership with private landowners through deer management plans. However, the Committee understand that there has been insufficient progress on these priorities, with only 2,314 hectares planted in the last year.

The SoNS report highlights the challenge of managing designated sites under current legislation and states that “management is required to maintain deer populations to levels the land can sustain”. **The Committee will consider the findings of the recently published SNH report on deer management in Scotland and write to the Scottish Government with views on this in the New Year.**

We heard that the current planting focus is on purchase and on large blocks of land but the forestry targets could be met and exceeded if the Forestry Commission focused on persuading landowners to plant ‘modest’ amounts (50-100 ha) of land as windbreaks, shelter and native woodland. The Committee also heard that there is a need for a shift in emphasis and for incentives for upland landowners to plant smaller, more diverse, woodlands.

The Committee also heard that the Forestry Commission has carried out a review of native woodland and 70% of the Western Atlantic Woodland SACs are in unfavourable condition.

The Committee are concerned that the Forestry Grant Scheme is inadequately funded and structured to ensure native woodland restoration. The Committee would welcome the Scottish Government’s view on this and the specific actions that are required to restore native woodland, including the scope for a re-design of the scheme to plant smaller, more diverse woodlands.

Stakeholders also questioned whether three years is adequate to secure compliance with Scottish and international targets. **If it becomes apparent, for example over the course of the next 18 months, that this timeframe will not be met, the Committee requests that you outline the consequence of non-compliance and what action the Scottish Government may take to address this. In relation to this the Committee also encourages the Scottish Government to publish the national rhododendron strategy.**

Priority 3 – Restoration of Freshwaters

The progress report considers that Scotland is “on track” with the development and implementation of two River Basin Management Plans, as well as delivering Water Framework Directive objectives and associated biodiversity benefits.

The SoNS report recognises the diverse range of freshwater habitats and states that climate change “presents significant threats to freshwater systems in montane areas”.

The Committee understand that there are concerns about the lack of baseline information in relation to freshwaters and mixed fisheries and we would welcome further detail on the work that is currently underway to identify and understand climate change impacts on freshwater habitats, estuaries and associated biodiversity to ensure that the best sites for vulnerable wildlife are protected.

The Committee are also interested to understand whether there are other significant risks to freshwater habitats, and what can be done to alleviate these. The Committee would welcome your view on this along with an update on progress regarding the wild fisheries review and forthcoming legislation, particularly in regard to likely associated timeframes. The Committee would also value an update on the localising of the scientific research into Salmon Conservation Gradings (Conservation of Salmon (Scotland) Regulations 2016 (SSI/115)).

Priority 4 – Benefits from and Investment in Natural Capital

The progress report considers that Scotland is “on track” with the requirement to ensure that businesses are more aware of their reliance on Scotland’s natural capital and more investment is being made in building natural capital. It cites the inclusion of the Natural Capital Asset Index as an indicator in the National Performance Framework (NPF) as a demonstration of the important contribution that nature makes to the prosperity of Scotland.

However, the progress report subsequently goes on to state that “further action is required” because, whilst the business sector is becoming more aware of how much we rely on natural capital, there is currently limited evidence to suggest that business investment in natural capital assets has increased. **Given that results to date are considered to be preliminary by the SoNS report, we would welcome your view as to whether it is reasonable to consider this Priority Project to be “on track”.**

The report states that “Our current assessment of the Aichi target on increased financial investment suggests we are also moving away from this international goal. We need to develop better metrics around the second part of the target on increasing investment on natural capital assets. A clearer lead for the planned action should be identified and the work required to deliver it scoped”.

The Committee heard that in the future, funding will be an issue for the Scottish forum on natural capital, particularly if it is to highlight investment opportunities for business, as it currently relies on small contributions. The Committee also heard that there are some pilot studies currently underway.

The Committee are interested to hear whether the Scottish Government is confident that inclusion of the Natural Capital Asset Index in the NPF and increased awareness in business of their reliance on natural capital assets could be considered sufficient to be “on track” particularly given that financial investment in building natural capital appears to be decreasing. In particular, does the Scottish Government have plans to provide a clearer lead for the action and the work required to deliver it?

We would also be interested to hear the Scottish Government response to the need for further secure funding streams and plans for pilot studies. We understand there is discussion with the Crown Estate and

others on the use of a protocol on a working land business and we look forward to receiving further information on this project and any plans to disseminate the findings.

Priority 5 – More people experiencing and enjoying nature

The progress report considers that Scotland is “on track” to increase regular visits and active travel in greenspace through improved infrastructure, information and campaigns and the provision of activities and events. It goes on to state that “Many organisations have made considerable effort in this area, and a number of high profile projects have been developed. Nevertheless, the target is very broad and will require sustained effort to deliver increases in regular visits to the outdoors and active travel, especially by groups who do not currently participate”.

The NPF shows that during 2015, 48.6% of adults are estimated to have visited the outdoors at least once a week, compared to 48.4% in 2014, and 44.0% in 2006, the baseline year.

The Committee heard about the value of green spaces but also about the need to integrate nature into our towns and cities, which stakeholders consider will make them more resilient. However, we heard that increasingly the poorest members of society have the least access to green space and this imbalance needs to be redressed.

Stakeholders also highlighted the importance of the national ecological network is facilitating access and we return to this later.

The Committee note that improved infrastructure, information, campaigns and provision of activities and events has contributed to only a marginal increase in adult outdoor visits. The Committee would welcome your views on why this has been the case and what more needs to be done in order to meet the target.

The Committee are concerned that the benefits of experiencing biodiversity, the wider environment and associated improvements in health and quality of life are not seen across society as a whole, and may be limited to particular social groups. We would be interested to hear of any research the Scottish Government has undertaken as to why this is happening and what action is necessary to redress the imbalance and integrate nature into our towns and cities and extend access to those with disabilities.

The Committee would welcome a view from the Scottish Government as to whether it considers there is scope and benefit to expand the work of the Central Scotland Green Network, and, if there are barriers to expansion, what those might be.

We also heard that SNH’s attendance at a number of shows and public events is being scaled down. The Committee agree with stakeholders that these events can offer excellent points of engagement and we explored these concerns with SNH in the context of our current budget scrutiny. The Committee received assurances that this was not the case and SNH is continuing to focus resources on public engagement.

Priority 6 – Taking Learning Outdoors

The progress report considers that Scotland is “on track” to provide 100 schools in the 20% most disadvantaged areas access to quality greenspace for outdoor learning.

The Committee heard evidence of the benefits of outdoor learning, in terms of understanding and engaging with the natural environment and in improvements to wellbeing and mental health. However, the Committee were also told that there are considerable constraints to the promotion of outdoor learning including teachers’ time, resources – particularly the cost of hiring transport, and possible health and safety issues. However, the Committee also heard that some of these constraints, such as resourcing, are resolvable with sponsorship and support from business.

A longer term issue appeared to be the perceived lack of ‘countryside resonance’ with many teachers. Stakeholders considered that there was an opportunity for the Scottish biodiversity strategy to address this through teacher training and the provision of additional residential educational opportunities across the countryside and on working farms.

The Committee heard of good practice in the area of engagement with nature and support for this in the curriculum such as the Field Studies Council’s building at Kindrogan, the Forest Schools, work of the Royal Botanic Gardens, the Living Landscape Projects and the work of local biodiversity partnerships.

The Committee are of the view that while there are examples of good practice across Scotland, there is a need for a more systematic approach to engagement and provision of support to schools, teachers and communities to enable and encourage them to engage with the natural environment. The Committee encourage the Scottish Government to give further consideration to what more can be done to share best practice, provide teacher training and support and improve outdoor learning.

Priority 7 – Developing Scotland’s *Natural Health Service*

The progress report considers that Scotland is “on track” to improve greenspace quality and use on at least one hospital or health care facility in each NHS board on mainland Scotland. This includes developing and promoting a green exercise tool-kit for use by the health and environment sectors and delivering a NHS Greenspace Demonstration Project; providing quality greenspace for use by patients, visitors and staff for treatment, recovery, recreation and relaxation.

The Committee heard of the importance of greenspace and green exercise to mental health and to those with reduced mobility or disabilities. **Given the increasing demand on the NHS the Committee would welcome a view from the Government on the barriers to developing Scotland’s natural health service, whether delivering this priority to 2020 is likely to be impacted by external influences and what more can be done within this priority.**

Priority 8 – Protected Areas in Good Condition

The progress report considers that at least 80% of designated “features” were in favourable condition by 2016, and that this project is “complete”.

However, the Committee heard that there are issues in: the definition of favourable condition, in the resilience of the 80% figure, and that the work being done to ensure that favourable condition is maintained is less than adequate.

The Committee also heard that there is a need for targets to be re-stated in order that people are focused on what needs to be achieved. Stakeholders raised concerns that the inventory document – the habitat map of Scotland - is long overdue and stakeholders considered without that we have no comprehensive baseline – “without knowing what we have, it’s pretty hard to conserve it”.

Concerns were also raised in relation to the possible impact of a reduction in financial support following an exit from Europe on Scotland’s protected areas.

The Committee would welcome the Scottish Government’s view on the concerns raised in relation to the definition of favourable condition, the resilience of the 80% figure and the adequacy of the work to maintain favourable condition, including plans to improve baseline information.

We would also welcome further detail on the key threats to maintaining favourable condition of designated sites, and whether the Scottish Government considers that there is adequate funding available to address this going forward, particularly in light of the EU exit vote.

Priority 9 – Conservation of Priority Species

The progress report considers that Scotland is “on track” to deliver six high profile projects, with a further suite of species projects to be developed. It notes the “considerable investment and good progress” that has been made. However it also suggests that a more strategic approach is needed to inform investment in new species-focused projects, with work also needed to successfully implement the pollinator and plant health strategies.

Whilst the SoNS report also highlights some successes, it contrasts this with the UK Priority Species Indicator showing both the abundance and occupancy of priority species falling by 67% and 35% respectively since 1970. Over the short-term (2002-13), the indicator of average abundance has fallen by 12%, and occupancy has fallen by 6%. For Scotland, the SoNS report shows a mixed picture, particularly for wild birds.

Whilst “considerable investment and good progress” appears to have been made with high profile species, evidence suggests that other species and habitats are not faring as well. The Committee would welcome the Government’s view on why this is the case and what can be done to improve a wider range of biodiversity and reverse historical declines.

The Committee are also interested to explore whether the Scottish Government believes the new species focused projects are concentrating on the right species, and if this approach could have detrimental impacts in terms of focus and investment on other species.

Stakeholders suggested that the Biodiversity Strategy for both the terrestrial and marine environment could usefully be developed in three ways:

- **development of an adaptive management approach capable of taking account of issues such as predation pressure and climate management which may need a policy support mechanism**
- **facilitation of land managers to work co-operatively and develop a self- motivated approach**
- **further clarity of purpose in biodiversity requirements and co-ordination**

The Committee would welcome the Scottish Government's view on these suggestions for development of the Biodiversity Strategy.

Priority 10 – Improving Ecological Connection

The progress report considers that Scotland is “on track” to improve connectivity between habitats and ecosystems, and cites habitat management to support connections for eight sites within the Central Scotland Green Network area. However, it recognises that further action is required because “as the target is currently framed, it’s hard to give an objective assessment of progress. We also need to develop a consensus on what a national ecological network means in practice”.

The SoNS report stresses the importance of high nature value farming and crofting practices, and increasing understanding of the need for bigger and better wildlife sites that function as a network.

The Committee would welcome information from the Scottish Government on what further action is has identified as being required to ensure that Scotland is in a position to objectively assess progress in improving ecological connection.

In evidence to the Committee on the Budget (on 8 November) Ian Jardine of SNH suggested that there is no overall agreement on what the national ecological network is or what it should look like.

The Committee are interested to hear the Scottish Government's view as to why, given that discussions about a national ecological network have been ongoing for over a decade, there is still no consensus on what it means in practice and what the Scottish Government's plans are on the process and timeframe for developing a consensus on this.

The Committee welcome the inclusion of the national ecological network in the national planning framework and supports stakeholders' views that this now needs to read across into other Scottish Government strategies such as the land use and marine strategies.

The Committee would welcome a view from the Scottish Government on how the ecological networks are embedding into local development plans and whether cognisance is being taken of those networks in planning decisions on the ground.

Priority 11 – Sustainable Land Management

The progress report considers that Scotland is “on track” with the promotion of measures to support biodiversity under the Common Agricultural Policy (CAP). However, the SoNS report highlights the increasing intensification of

lowland farming, with the associated loss of many farmland birds and other wildlife. It goes on to state: “The High Nature Value (HNV) farming and crofting of agriculturally marginal lands in the Highlands, islands and uplands of Scotland is increasingly difficult to sustain economically and socially. However, the sensitive grazing regimes and low-intensity arable production involved are hugely valuable for a whole suite of wildlife, and subsidies directed to HNV farming systems deliver tangible environmental benefits from public investment. These benefits are often delivered through conservation organisations working together with landowners to maintain HNV farming at a landscape scale, and enable wildlife populations to thrive.”

The Committee heard that greening is a mandatory component associated with the CAP basic payment scheme which is designed to support farming practices that are beneficial for the climate and the environment. However, the Committee heard that there is enormous room for improvement in the delivery and focus of the agri-environment climate scheme and more could be done to demonstrate best practice for biodiversity and to ensure farmers are actively and effectively fulfilling their greening requirements.

The Committee recognise that there is a debate about future approaches to and funding of high nature value farming post Brexit and would welcome the views of the Scottish Government on this.

The Committee would also welcome the Scottish Government’s view on whether the Wildlife Estates Scotland Initiative and Demonstration Farms have enough coverage across Scotland, the wider role of agricultural advisory and extension services and whether more can be done to ensure that best practice can be shared and adopted across the sector.

Priority 12 - Increase environmental status of our seas

The progress report considers that Scotland has “completed” this priority project by incorporating 10% of Scotland’s seas into nature conservation Marine Protected Areas. It states that “we have exceeded the target for the area to be included in Scottish Marine Protected Areas (MPAs). Future challenges are developing the evidence base and delivering measures to effectively manage MPAs. This is underway and will need collaboration with all stakeholders if it is to succeed”.

Whilst the SoNS report recognises this work, it states that the network is only partially implemented at present, with gaps in coverage, including for seabirds and marine mammals, as well as basking shark, sea trout, spiny lobsters, and east coast reef sites.

The Committee heard concerns that this priority only looks at the proportion of the seas in MPA designation, but significantly it does not consider how MPAs are managed and it does not measure the status of the sea. We understand that there are still many declines in the sea. We heard that while there has been considerable progress in the marine environment a number of challenges remain. Specifically there is a need to ensure adequate resources are directed to support a marine monitoring strategy and develop the evidence base for MPAs to support the identification of areas requiring protection and demonstrate the benefits of designation, and there is a need to deliver measures to manage MPAs effectively.

The Committee agree with stakeholders that the sustainable development of the sea and delivery for biodiversity are about managing all activities and regional marine planning provides an excellent opportunity to do that. However, issues of resourcing and capacity, previously highlighted by the RACCE Committee in Session 4 will be fundamental to the success of this work.

The Committee share the view of the SoNS that the marine environment faces major challenges from: climate change, the direct and indirect impacts of fishing, development pressure, pollution and invasive non-native species on islands.

The Committee would welcome a view from the Scottish Government on whether it considers that it is enough solely to put MPAs in place for this target to be “completed”. The Committee request further detailed information on the actions that are now being taken to ensure their success, including development of the evidence base. We are also interested to know how the Scottish Government intends to tackle the claimed “gaps in coverage”.

Aichi Interim Report

The Committee understand that the Aichi Targets interim report is the first time an attempt has been made to report on these targets in Scotland. However, it is apparent that the evidence base is currently incomplete, and the report notes that the “collation of data and information across such a wide range of areas from financial resource allocation to knowledge transfer and conserved genetic resources has presented considerable challenges”.

We would welcome the Scottish Government’s view on the key challenges have been to developing the evidence base, and how these are being overcome.