

# Petitioner submission of 12 April 2023

## PE1966/F: Formally recognise and incorporate local knowledge in Scottish Government policy

The Scottish Gamekeepers Association hereby respond to the following submissions relating to their petition: PE1966: Formally recognise and incorporate local knowledge in Scottish Government policy.

Specifically:

- NatureScot submission of 3 February 2023 PE1966/D
- Scottish Government submission of 22 March 2023 PE1966/E

### **NatureScot submission PE1966/D:**

NatureScot were asked to provide details of the membership and skills of their Board. They were also asked a specific question relating to inviting a representative from the Scottish Gamekeepers Association (SGA) to join their board.

In response, NatureScot advised all appointments to their board are made in line with the Ethical Standards Commissioner's Code of Practice for Ministerial Appointments to Public Bodies in Scotland.

The Code encourages diversity and representation from all walks of life. In the consideration of new appointments or reappointments, the Code states Scottish Ministers will balance that need with the opportunity to 'increase the diverse range of relevant skills, knowledge, experience, including lived experience, values and other attributes on a board by making a new appointment through open competition' (A3, p.7)

Analysis of the profiles of existing board members reveals 67% are leading academics, 17% are estate owners/entrepreneurs, 8% are from public authority background and 8% represent an academic, farming mix.

NatureScot conclude 'this broad range of professional and personal experience provides the Board with a variety of expertise and the means by which to ensure that both scientific and local knowledge is applied to our work'.

However, the board cannot be considered diverse when it is dominated by academia and those in privileged positions, who yield power in

society. It would appear there is no place for the local practitioner, the individual who has sound working knowledge of their environment and a unique skill-set that is undervalued and unrecognised.

The fundamental aim of this petition is to recognise and incorporate local knowledge within Scottish Government policy, thus avoiding structural discrimination and ensuring egalitarianism in the decision-making process. Until that happens, regardless of the aims and intentions of the Code, it is likely the process of selection, viewed through a prism of meritocracy by establishment figures who have little concept of the lived experience of the rural workforce, will marginalise those whose skills are non-academic.

### **Scottish Government submission PE1966/E:**

The Scottish Government's view was sought on whether there are differences in the consideration given to local knowledge and scientific knowledge.

The Scottish Government response advises 'there is no simple or binary answer to whether local knowledge and scientific knowledge are considered differently'. However, they also state that where responses to consultation questions specifically seek scientific evidence or knowledge, they will be considered on the basis of their scientific robustness.

In other words, whilst scientific knowledge is recognised for its merits, local knowledge is not. That is the crux of the matter and underpins the rationale for the recognition of local knowledge within Scottish Government policy. Local knowledge, a unique body of knowledge and expertise in its own right, recognised by the Convention on Biodiversity, Dasgupta, and the IUCN is given no greater credence than that of public opinion.

The Scottish Government response states all responses are considered and responded to as outlined in the best practice handbook on consultations. Within this handbook, the following advice is given:

'Remember the consultation principles, a consultation cannot be considered valid if it does not enable people to participate.' (p,21)

Enabling people to participate as the Best Practice Code states, includes the use of plain language and unnecessary technical terms. Yet, in the recent National Park consultation organised by NatureScot, alienating policy jargon prevailed. This resulted in a poor response to some

questions and criticism of the inaccessibility of the policy language adopted: <https://www.nature.scot/doc/national-parks-advice-ministers-february-2023#Executive+Summary>

The Scottish Government mention face-to-face engagement events, social media and deliberative methods as additional methods for engagement, however, when these events are organised at seasonally busy times, engagement is impossible and reveals a lack of consideration/understanding of the rural working environment.

The Scottish Government consider that basic broadband access is comparable between rural and urban Scotland. However, for many rural practitioners staying in the most remote areas, poor broadband remains an issue.

In response to the question regarding changes to development and delivery of conservation policy resulting from the report of the Independent Working Group on Institutionalising Participative and Deliberative Democracy, (IPDD) the Scottish Government advise they will take a government-wide approach and apply it to the conservation arena.

The IPDD report includes various recommendations which aim to improve participation and reduce marginalisation. It recognises the existence of ingrained inequality and the need for greater democracy and empowerment in Scotland. However, it also states, 'there is currently no dedicated Scottish Government resource to deliver on the ambitions for participatory and deliberative democracy,' p.15.

Consequently, to ensure equity in the conservation arena in Scotland, to deliver positive outcomes for biodiversity and meet net zero targets for 2030, the SGA consider it imperative that the merits of local knowledge are fully recognised and incorporated within Scottish Government Policy without delay.