

Dear NZET Committee,

Thank you for inviting the Coastal Communities Network (CCN) to submit written evidence on the Scottish Government's draft delivery plan for the Scottish Biodiversity Strategy, ahead of your meeting on 12th December.

Scotland is known to be one of the most nature-depleted countries in the world. In our consultation response to the earlier draft of the Scottish Biodiversity Strategy, we emphasised that a prerequisite for success (in halting and reversing biodiversity loss) would be a level of political will to take actions which might be unpopular for certain sectors. Whilst politicians must be willing to listen to all stakeholders, and set up pathways to enable meaningful input to proposals, they must also be prepared to address the root causes of the nature emergency we find ourselves in. This means, in practice, moving away from the mindset of a presumption in favour of "sustainable" economic development (as measured by metrics such as GDP) over environmental protection and restoration.

With that in mind, we address each of the questions we were asked to respond to.

Does the draft plan appear fit for purpose to address the biodiversity crisis as it affects Scotland?

We do not believe it does, so far as the marine environment is concerned. One of the primary shortcomings we have identified is the absence of decisive and immediate actions to combat marine biodiversity loss. Regrettably, many of the proposed measures in the draft plan merely restate pre-existing commitments and policies, offering minimal additional value in the short term. One example is the commitment to deliver management measures for inshore Marine Protected Areas (MPAs) and Priority Marine Features outside MPAs by 2025, which merely represents a delay from the earlier commitment made in the Bute House Agreement. Such delays are unacceptable, and we urge the Committee to consider a more expeditious timeline for the fulfilment of these crucial measures.

Furthermore, a considerable number of actions within the draft plan lack specificity and fail to provide clear implementation timelines. It is imperative that all outlined actions be revised to adhere to the SMART criteria, with particular emphasis on setting realistic and accountable timelines for both their planning and execution. For instance, while we appreciate the commitment to "*Increase the investment in activities that help restore Scotland's coasts and seas by 2028*," this statement lacks meaningful impact without detailed information on the methods and funding sources involved.

Fundamentally, the view of CCN is that halting the decline of biodiversity in the marine environment requires comprehensive spatial management rooted in an ecosystem-based framework. Regrettably, this crucial perspective is entirely absent from the current Delivery Plan. The prevailing management system for inshore fisheries exacerbates the issue.

If the Scottish Government is serious in its commitment to become nature positive by 2030, we need to stop tinkering at the edges, go beyond planning to plan, and confront immediate threats to biodiversity head on. This includes addressing, in particular, the unsustainable growth of open cage salmon farming and the prevalence of bottom-contact fishing in Scotland's inshore waters. Once we've dealt with these threats then we can move to explore the opportunities for active recovery of biodiversity.

We hope the Scottish Government agrees that a healthy marine environment is essential for the long-term viability of coastal communities and commits therefore to working with local

Coastal Communities Network submission to the Net Zero, Energy and Transport Committee – 5th December 2023.

people, fishers included, and all other stakeholders to find solutions that deliver meaningful, enhanced protection for our marine environment whilst supporting ecologically sustainable livelihood opportunities.

Do you have any concerns that implementation of the plan could have adverse consequences? If so, please set these out.

The adverse consequences of not taking bold, immediate action will be far more consequential to Scotland than what is currently being proposed in the plan.

What matters, other than those set out in the plan, would require to be addressed to ensure that the plan works?

In addition to the elements outlined in the plan, there needs to be a serious conversation on the critical aspect of financing for the proposed action and initiatives. NatureScot has experienced a substantial 40% reduction in its real-term budget since 2010. CCN would like to understand how the ambitious goal of restoring nature by 2040 can be achieved in the face of continuous cuts to our environmental agencies? Is the expectation, as has happened in other sectors of society, that charities and community groups will step up and assume the responsibilities typically shouldered by statutory bodies?

CCN strongly advocates for increased community leadership in the management of our seas, and acknowledge the pivotal role that community-based organisations have already played in engaging with marine conservation and restoration efforts in Scotland. However, it is crucial to recognise that the Scottish Government has a role to play in creating an enabling environment where communities are not only encouraged but also equipped with the necessary resources and expertise to articulate and realise their own visions for conservation and restoration. This involves not just acknowledging the value of community involvement but actively fostering an inclusive approach that empowers local stakeholders.

Finally, we would like to point out that an overemphasis on searching for robust evidence to inform decisions is hindering progress in tackling the biodiversity crisis. Ministers and other decision-makers often need reminding of their obligations to uphold the precautionary principle with regards to uncertainties in environmental matters, which states that if a policy or other activity is suspected to cause harm to the environment, they must err on the side of caution even where complete scientific proof of a risk is lacking. Instead, lack of evidence has routinely been used by the Scottish Government to avoid taking, and even obstructing, efforts to protect nature. An obvious example of this is the consenting of new salmon farms despite the many unknowns on the scale of the existing impact of the sector on the marine environment.

We have a golden opportunity to get a handle on this crisis and turn things around, but only if the political will is there.

Thank you for your consideration.

Yours sincerely,

Alan Munro

On behalf of the Coastal Communities Network