

Correspondence from Scottish Environment LINK, 9 September 2026

Supplementary evidence to Climate Action Committee

Organisational priorities across Session 7

1. What do you see as the priority areas which this Committee should focus on this session to have the most impact?

- Scrutiny of **nature targets** including timing of introduction, the detail of targets themselves, and links to wider policy and decision-making.
- Delivery of the **Scottish Biodiversity Strategy**, the key overarching policy document related to the achievement of nature targets. In particular the Committee may wish to give early consideration to progress towards the 30 by 30 target, including the monitoring and condition of existing protected sites.
- **Climate change adaptation** and delivery of the **Climate Change Plan**. Adaptation is a particularly important frame for understanding the connections between nature and climate and our response to challenges such as wildfires, extreme weather, and invasive non-native species. The current national adaptation plan (SNAP3) runs to 2029.
- **Circular economy**, including the setting of targets and delivery of the Circular Economy Strategy.
- **Public sector reform** including, in particular, the implications of reform on capacity and expertise within public bodies; the levels of funding given to environmental agencies, and their adequacy in delivering government policy; and the statutory basis of any new agencies (e.g. the defined responsibilities and balance between environmental and other considerations).

In addition to the above, as part of pre-budget scrutiny the Committee should consider whether public funding for the natural environment is sufficient to achieve government objectives across nature restoration, climate mitigation and adaptation.

2. In particular where do you think engagement by the Climate Action Committee could help to enhance public participation and awareness?

Legal climate targets have been key in mainstreaming decarbonisation across portfolios. The introduction of targets for nature recovery and the circular economy should play a similar role, and the Committee is well placed lead debate around these targets and their delivery.

Specific policy areas and forthcoming policy milestones

3. What engagement will your organisation expect to have in the development of statutory nature targets?

LINK campaigned for the introduction of statutory nature targets and strongly support the Natural Environment Act. In 2023 we published [a report](#) outlining our vision for nature targets and engaged with the Scottish Government throughout the passage of the Act. LINK is not directly involved in the work ongoing on target development but will respond in full to any consultation, and would welcome any opportunity to contribute to this process.

4. What are your views on progress, and the anticipated timescales for action and delivery, of Ministerial duties under the Circular Economy (Scotland) Act 2024 to set targets for a circular economy and to produce a statutory code of practice on household recycling?

We welcome the publication of Scotland's Circular Economy Strategy and Route Map, but progress on implementing the Circular Economy (Scotland) Act 2024 now needs to accelerate, particularly on statutory circular economy targets and the household recycling code of practice.

Circular economy targets should be introduced as a priority and focus on reducing material consumption, waste generation and environmental leakage, alongside improving reuse rates. Targets must be ambitious, measurable and supported by regular public reporting. Setting science based statutory targets for the circular economy are the most important step Scotland can now take to fulfil its plans. We believe these targets must be based on reducing the amount of materials Scotland uses. LINK members believe that Zero Waste Scotland's latest publication of this dataset is not fit for purpose for a target and deserves scrutiny by the Committee.

Powers in the Circular Economy Act to ban the disposal of unsold consumer goods have not been used, while charging for single-use cups has not progressed despite the consultation being completed.

The statutory code of practice on household recycling should be developed and implemented as soon as possible to deliver greater consistency across Scotland, increase recycling performance, reduce contamination, and help prevent waste from reaching rivers, coasts and seas.

5. What are the key obstacles to progress on water and climate resilience within the current legislative framework?

- **Drinking water leakage:** around 30% of treated drinking water supplied was lost from Scotland's drinking water mains in 2022/23. This is water that has been treated using chemicals, and so represents significant resource waste, as well as placing a greater burden on raw water supplies by requiring greater drawdown from reservoirs and extraction from groundwater. The improvement of our water infrastructure is essential for greater climate adaptation.
- **Nature-based solutions:** restoring freshwater habitats through wetland restoration, tree planting, and sustainable farming can improve resilience to flooding and lower water temperatures. Removing artificial barriers in rivers will restore natural processes and support fish migration.

- **Novel chemical pollutants:** we need comprehensive monitoring of pharmaceuticals, PFAS (forever chemicals) and other emerging contaminants in the freshwater environment.
- **Waste water:** The Water Environment and Water Services (Scotland) Act 2003 implemented EU directives in relation to water management into Scots law. The introduction in the EU of the revised Urban Wastewater Treatment Directive in 2025 means that Scotland has now fallen behind European standards of regulation.
- **Invasive non-native species:** INNS is a major driver of biodiversity loss in Scotland and the freshwater environment is particularly vulnerable. Climate change will increase the likelihood of new invasive species becoming established and we need improved prevention and monitoring alongside rapid response to new incursions.
- **Sewage spillages:** LINK members, and the public, remain highly concerned over the levels of sewage pollution and the implications for human and environmental health. Low (though improving) levels of monitoring of overflows exacerbate these concerns and progress must be made in this parliament.