

# Citizen Participation and Public Petitions Committee

13th Meeting, 2023 (Session 6), Wednesday  
20 September 2023

## PE1966: Formally recognise and incorporate local knowledge into Scottish Government policy

<b>Petitioner</b>	Scottish Gamekeepers Association
<b>Petition summary</b>	Calling on the Scottish Parliament to urge the Scottish Government to formally recognise local knowledge and ensure it is given full consideration alongside scientific knowledge throughout consultation, decision-making processes and in policy development, specifically within the conservation arena.
<b>Webpage</b>	<a href="https://petitions.parliament.scot/petitions/PE1966">https://petitions.parliament.scot/petitions/PE1966</a>

### Introduction

1. The Committee last considered this petition at its meeting on [21 December 2022](#). At that meeting, the Committee agreed to write to the Scottish Government and NatureScot.
2. The petition summary is included in **Annexe A** and the Official Report of the Committee's last consideration of this petition is at **Annexe B**.
3. The Committee has received new responses from the Scottish Government, NatureScot and the Petitioner which are set out in **Annexe C**.
4. Written submissions received prior to the Committee's last consideration can be found on the [petition's webpage](#).
5. Further background information about this petition can be found in the [SPICe briefing](#) for this petition.
6. The Scottish Government's initial position on this petition can be found on the [petition's webpage](#).

7. Every petition collects signatures while it remains under consideration. At the time of writing, 1,317 signatures have been received on this petition.

## Action

The Committee is invited to consider what action it wishes to take on this petition.

**Clerk to the Committee**

## Annexe A

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

## Petitioner

Scottish Gamekeepers Association

## Date lodged

5 October 2022

## Petition summary

Calling on the Scottish Parliament to urge the Scottish Government to formally recognise local knowledge and ensure it is given full consideration alongside scientific knowledge throughout consultation, decision-making processes and in policy development, specifically within the conservation arena.

## Previous action

Following the successful online Rural Workers Protest #RWP21 an email was sent to The First Minister, Nicola Sturgeon on 24.3.21 requesting cognisance of local knowledge. The response received ignored the full conceptual understanding of local knowledge per se.

Ongoing discussions with Scottish Government representatives and Nature Scot regarding the new biodiversity strategy currently under development and the role of local knowledge in safeguarding biodiversity and climate change mitigation.

## Background information

Local knowledge prevents biodiversity loss, contributes towards climate change mitigation, the economy and well-being of Scotland's people.

Local knowledge is recognised within the Convention on Biodiversity and Malawi principle 11: 'The ecosystem approach should consider all forms of relevant information, including scientific and indigenous and local knowledge, innovations and practices'.

Local knowledge, the unique skill-set and pragmatism, often acquired over generations, which provides an invaluable toolkit including wildfire mitigation, peatland restoration and species management, contributes to the health of Scotland's unique habitats and biodiversity.

The Scottish Government have previously funded initiatives that include local knowledge: 'Understanding predation' and 'Working for Waders.'

The incorporation of local knowledge within Scottish Government policy is in the interests of social justice; statutory incorporation would help to address conflict, avoid structural discrimination and marginalisation and contribute towards positive outcomes for biodiversity.

## Annexe B

### Extract from Official Report of last consideration of PE1966 on 21<sup>st</sup> December 2022

**The Convener:** PE1966, which was lodged by Helen Ferguson on behalf of the Scottish Gamekeepers Association, calls on the Scottish Parliament to urge the Scottish Government to formally recognise local knowledge and ensure that it is given full consideration alongside scientific knowledge throughout consultation and decision-making processes and in policy development, specifically in the conservation arena.

The United Nations Educational, Scientific and Cultural Organization defines local knowledge as

“the understandings, skills and philosophies developed by societies with long histories of interaction with their natural surroundings. For rural and indigenous peoples, local knowledge informs decision-making about fundamental aspects of day-to-day life.”

Helen Ferguson has argued that local knowledge is often considered inferior to scientific knowledge and that the conservation arena is dominated by academia and the scientific elite, which is distanced from the practical daily routine and reality of rural practitioners.

Helen also suggests that the board and leadership of NatureScot have little representation from individuals who have experience of day-to-day land or water management. She also raises concerns about accessibility issues in relation to poor broadband connection in rural areas, leading to challenges when engagement is something that they would wish to pursue.

The Scottish Government’s response to the petition sets out its co-design approach to developing a new Scottish biodiversity strategy, its delivery plan and its work on consulting the public on proposed legislation.

Do members have any comments or suggestions?

**Alexander Stewart:** It is imperative that we write to the Scottish Government to ask for its view on whether there are differences, as the petitioner indicates, in the considerations that are given to local knowledge and scientific knowledge. We should also ask how it ensures that people with poor internet access, particularly in rural areas, are given the opportunity to respond to public consultation and what changes the Government intends to make in its practices, including the development of the delivery of conservation policy, following the representations in the report of the independent working group.

**David Torrance:** Could we also write to NatureScot to seek details on the membership and skills of its board?

**The Convener:** How very apposite after our deliberations this morning.

**David Torrance:** It is, considering what we heard earlier.

**Fergus Ewing:** Can we ask NatureScot when it will invite someone from the Scottish Gamekeepers Association to join its board? It is strange that there is a group that represents the people who work daily on the land but that is completely unrepresented on NatureScot, as far as I understand? Those people are not sitting clattering keyboards—they are not keyboard warriors. They are actually managing nature and looking after animals for which they care deeply. NatureScot is denied the opportunity of the centuries of experience of people who care deeply for the countryside and the animals of Scotland.

**The Convener:** I think that we agree that we will ask that question as well.

## Annexe C

### NatureScot submission of 3 February 2023

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

Thank you for your correspondence in relation to the Citizen Participation and Public Petitions committee's consideration of petition: [PE1966: Formally recognise and incorporate local knowledge in Scottish Government policy.](#)

The correspondence seeks details of the membership and skills of NatureScot's board and also asks a specific question relating to NatureScot inviting a representative from the Scottish Gamekeepers Association to join the board. This response provides information in response to these matters.

NatureScot board members are appointed by Scottish Ministers through an open process managed by the Scottish Government's Public Appointments Team, who oversee the regulated public appointments process in line with relevant legislation. Essential and desirable skills and experience of applicants for public appointments is based on the board's needs such as the knowledge, skills and qualities which most closely match those required. The appointments process will also identify those that best meets the needs of the board which are underrepresented, including characteristics, such as sex, disability, age, ethnicity, and sexual orientation. Appointments are made using methods that are open and inclusive and which are aimed at encouraging applications from a wide range of people. All board members are appointed on an individual basis and not as representatives of organisations. NatureScot policies do not allow for the co-option of any full board member. Appointments have to be progressed through the above outlined process.

All appointments to NatureScot's board are made in line with the Ethical Standards Commissioner's Code of Practice for Ministerial Appointments to Public Bodies in Scotland. Any future appointments will be made in accordance with the guidelines outlined in the revised Code of Practice, which came into effect in October 2022. The process outlined in this

correspondence will serve to apply to any future potential representatives of the board.

It is worth noting that appointments made to the board have come as a result of open, widely promoted and highly competitive processes which have attracted strong interest from a range of sectors, and which have received a large amount of applications. In September 2022, the Minister for Green Skills, Circular Economy and Biodiversity, Lorna Slater MSP, announced the appointment of the three latest members of the board, which represents the most recent changes to its membership.

NatureScot believe that it is important for our board to provide significant experience in a wide range of areas including the environment, science, business and education. Our current board has strong credentials in fields such as environmental science, climate change and farming, as well as bringing the wealth of experience necessary for robust strategic oversight and scrutiny. The board's primary objective is to help Scotland's nature thrive and fight climate change.

NatureScot's board comes from all walks of life. With respect to the specific areas outlined in your correspondence, the board has demonstrable practical experience of land management, as well as members who come from policy development, scientific and academic backgrounds in relation to this area. This includes members who are land managers, farmers, rural business owners and members who have represented or worked alongside communities across Scotland to deliver sustainable nature-based projects. The same applies to water management, with a range of knowledge represented across the board, including with respect to fresh water ecology and the sustainable management of water systems. 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.

Biographies of the board, which includes an overview of the respective skills and experience of each member, are set out on our [website](#).

A final point for the committee's attention is that Dr Mike Cantlay's tenure as Chair of NatureScot will come to an end in May 2023, after six years in post. Recruitment for Dr Cantlay's replacement will be led by

the Scottish Government in line with the aforementioned processes and is expected to start shortly.

I hope that the information provided is of use to the committee's consideration of this petition. If any further information from NatureScot would be beneficial in relation to your continued scrutiny of the matters set out, then please do not hesitate to ask.

## Scottish Government submission of 22 March 2023

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

The Citizen Participation and Public Petitions Committee considered the above petition at its meeting on 21 December 2022.

The Committee is keen to understand:

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

All responses to consultations are considered and responded to as outlined in the Scottish Government's best practice handbook on consultations. The type of consultation and the questions asked will greatly influence how responses are considered, meaning there is no simple or binary answer to whether local knowledge and scientific knowledge are considered differently. For consultations that actively seek public opinion there may be greater emphasis placed on local knowledge or local opinion when considering responses to a question. Whereas responses to consultation questions that specifically seek scientific evidence or knowledge will be considered on the basis of their scientific robustness. Regardless, all responses will be considered and responded to.

- How the Scottish Government ensures those with poor internet access, particularly in rural areas, are given an opportunity to respond to its public consultations;

Best practice for consultations is to use methods appropriate to the audience that is trying to be reached. In addition to online consultation responses, the Scottish Government consultation guidance includes an in-depth discussion about tailoring methods to the audience you're trying to reach, and suggests other engagement approaches can include face-to-face engagement events, social media, and deliberative methods. All consultation leads must consider this guidance when planning a consultation.

A tailored approach to consultation is taken, with each policy team responsible for planning and implementing the consultation to reach their intended audience. For rural communities, the Scottish Government is aware that households in rural areas are less likely to have access to superfast broadband, however, use of consultation websites require only basic access, and that is broadly comparable between rural and urban Scotland.

The guidance also states that a postal address should also be provided so that people who are not online can respond to the consultation.

- What changes to engagement practices, including in the development and delivery of conservation policy, are intended following the report of the Independent Working Group on Institutionalising Participative and Deliberative Democracy.

In the most recent Programme for Government, we committed to publishing a response to the report of our working group on Institutionalising Participatory and Deliberative Democracy (IPDD), setting out how we can involve people and communities, government, and children and young people in democratic decision making.

We are in the process of carefully considering this further, assessing the new activities and skills that would make this a success, and taking account of the resource demands that this would create.

In keeping with the scope of the IPDD working group's recommendations, our response will take a government-wide approach. Specific policy areas, such as conservation, will then consider the applicability of this to their work.

## 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.

# Petitioner submission of 7 September 2023

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

We would like to make you aware of new information, in the form of a NatureScot commissioned report led by The James Hutton Institute, which recommends greater incorporation of local knowledge when understanding and addressing biodiversity loss in Scotland.

The paper is here: <https://www.nature.scot/doc/naturescot-research-report-1309-understanding-indirect-drivers-biodiversity-loss-scotland>

In our view, this new paper, published this month, backs the petition's main aim which is to see recognition and incorporation of local knowledge into Scottish Government policy. In the midst of a nature and biodiversity crisis, we consider this to be more urgent than ever.

In particular, we would draw attention to the following statements:

“Local and experiential knowledge is undervalued in environmental decision making. Participatory governance arrangements should be developed that incorporate local knowledge into decision making.”

“Local and experiential knowledge is increasingly accepted as a valid input into decision-making: governance structures should include such local and experiential knowledge alongside other forms of evidence and be balanced to prevent vested interests misdirecting change.”

The paper also acknowledges there is currently a shortage of rural skills, which makes the knowledge and skill-sets of rural practitioners even more important to Scotland's efforts in tackling the climate and biodiversity crises.