



RSPB Scotland submission to the Net Zero, Energy and Transport Committee

Scotland's Biodiversity Strategy to 2045.

Summary

To create the step change in action that nature needs, the Scottish Biodiversity Strategy (SBS) must:

- Be renamed 'Scotland's Nature Emergency Strategy' to communicate its significance and the urgency required to all parts of the Scottish Government
- Include commitments to key actions for achieving the outcomes, with detail to be set out in delivery plans, including:
 - A national programme of ecosystem restoration across Scotland
 - A national programme of species recovery
- Set clear targets alongside the high-level outcomes
- Include actions to improve our protected nature sites

Introduction

RSPB Scotland is part of the RSPB, the largest nature conservation charity in Europe, taking action for nature with a bird's eye view. Together with our partners, we protect threatened birds and wildlife so our towns, coast and countryside will teem with life once again. We play a leading role in BirdLife International, a worldwide partnership of nature conservation organisations.

The potential for positive progress from the Scottish Government has never been higher, with unprecedented environmental ambition from elected officials. The establishment of the £65m Nature Restoration Fund, Scotland's largest ever fund focused on nature restoration, is particularly welcome. It was therefore surprising and deeply disappointing that the consultation for Scotland's next Biodiversity Strategy - which will set the ambition for nature right up to 2045 - fails to set out meaningful actions for nature's recovery.

Nature is being lost around the world faster than ever in human history. Scotland, a country world-famous for its wildlife and landscapes, was recently found to be one of the most nature-depleted countries in the world¹. Whilst much of the loss of nature is historical, we are still losing nature now: since 1970 around half of our species have declined, with 1 in 9 at risk of national extinction.²

This nature crisis, alongside the twin climate crisis, poses an existential threat: unless we act now, the wellbeing and livelihoods of future generations hang in the balance. Saving nature is also a moral imperative, we cannot just stand by and watch our wildlife vanish.

This strategy should be a key vehicle for transformative action. Sadly, it falls short of being the Nature Emergency Strategy that we need at this critical moment. Whilst it does an excellent job at defining the

¹ [48398rspb-biodiversity-intactness-index-summary-report-v4.pdf](#)

² [State of Nature Scotland Report 2019 | NatureScot](#)



SCOTLAND

problem, it fails to set clear targets, provide an adequate focus on species recovery and commit to a comprehensive programme of ecosystem restoration. Without addressing these issues, this strategy will not move us on from the existing Biodiversity Strategy or the 2019 Statement of Intent on Biodiversity. We do not feel confident that in its current format, it will drive the change needed for nature by 2045, leading to potentially catastrophic environmental consequences.

The draft strategy includes the best summary of the state of Scotland's nature that we have ever seen from the Scottish Government, accompanied by a robust evidence base. The barriers and reasons for missed biodiversity targets in the past are comprehensively and honestly set out. This is encouraging and creates a shared understanding of the key challenges and drivers that all decision-makers, sectors and wider society can mobilise behind.

The draft strategy thus accurately depicts where we are and where we need to get to. It is therefore all the more disappointing that when it comes to *how* we get there, it falls down. The foundations are there and some key changes will transform this from another biodiversity strategy into a Nature Emergency Strategy that can really drive action.

Headline actions

To create consistency and continuity across the delivery plans, the SBS should commit to two headline actions that would run from now until 2045:

- A national pipeline of ecosystem restoration programmes operating at scale
- A national programme of species recovery targeted at threatened species and higher taxa

Species matter

Species are the building blocks of living systems. Despite historic losses, Scotland still hosts internationally important populations of wildlife. This has been terrifyingly brought home by the unprecedented bird flu outbreak, which has hammered our seabirds. Scotland holds 60% of the entire world population of great skuas (bonxies), but these birds have undergone massive and sudden declines. Our species like these skuas, our gannets and puffins, our threatened wildflowers, bumblebees, and fish, deserve targeted actions for recovery, to ensure future generations can enjoy and benefit from them.

We believe that the profile of species and species recovery is currently too low in the draft strategy, and not sufficiently integrated. This risks action that fails to measurably and comprehensively deliver directly for biodiversity, to fulfil Scotland's international responsibilities regarding species (e.g. Eurasian curlew, seabirds). Species need to be seen as key flagships for wider ecosystems, generating buy-in, public resonance and targets for operational activities and funding. There must be a commitment in the strategy to a National Programme of Species Recovery targeted at threatened species and higher taxa.

Ecosystem recovery

The next gap in the strategy is ecosystem restoration. Scotland's rivers, kelp beds, machairs, rainforests and other critical ecosystems are key national assets. They are homes to some of our most iconic wildlife, and yet are degraded and fragmented. We know from some genuinely excellent work on peatlands that the Scottish Government can design, fund and deliver targeted ecosystem restoration. We should tailor and extend that model to other key ecosystems in a phased, rolling programme of ecosystem restoration.

The Scottish Government's Infrastructure Investment Plan recognises the enormous value of the



SCOTLAND

ecosystem services that these natural assets provide (and the benefits of investing in them) but it must be for the biodiversity strategy to provide the detailed steer for prioritising that investment. If the biodiversity strategy doesn't provide this, there will be a huge gap in our ability to invest in the essential infrastructure needed for Scotland's future success.

The current approach in the draft identifies 'Broad landscape types of land and sea'. This does help identify the wider more dispersed actions that will be needed across these land- and sea-scapes, such as reforming agricultural payments, but further clarity is needed to properly target action where it is most needed. We suggest that **within** these landscape types the strategy needs to **specify priority ecosystems**. These should be prioritised for properly resourced, targeted restoration, via an ecosystem restoration pipeline of projects.

Suggested Ecosystems for Restoration Programmes:

- Peatlands
- Rainforest
- Moorlands
- Islands (seabirds and other specialist flora and fauna)
- Caledonian pinewoods
- Ancient Woodlands (comprising Ancient Semi-Natural Woodlands and Plantations on Ancient Woodland Sites)
- Kelp beds and priority continental shelf benthic communities
- Rivers
- Lochs and ponds
- Grasslands, machair and extensive cattle systems
- Estuaries and Saltmarsh
- Coastal seabed and Seagrass
- Pelagic seas
- Deep water marine communities

Targets for nature

The lack of SMART targets and indicators alongside the proposed outcomes is a major failing. Targets are key for providing a clear thread and framework that can be implemented via each respective delivery plan. Targets are also key for helping measure progress towards the milestones and vision set out in the strategy. As drafted, it will be difficult to determine progress towards many of the outcomes.

In comparison, the EU Biodiversity Strategy 2030 sets out commitments to a number of key targets to 2030, for example to protect at least 30% and strictly protect 10% of land and sea across the EU, to restore at least 25,000km of rivers to be restored to free-flowing, and to ensure at least 10% of agricultural area is under high-diversity features. It also commits to the EU Restoration Law, which has since been brought forward.

The Scottish Government has committed to a Natural Environment Bill, with nature targets: "*based on an overarching goal of preventing any further extinctions of wildlife and halting declines by 2030, and making significant progress in restoring Scotland's natural environment by 2045...expected to include outcome targets that accommodate species abundance, distribution & extinction risk, and habitat quality and extent. The targets will reflect the challenges of a changing climate.*"

We expected a clear link to be made in this SBS to the forthcoming Bill and for more detail about the promised targets. This critical context is absent. We do support the two key milestones that Ministers



SCOTLAND

have defined to deliver the strategy, which match the above commitment to nature restoration targets. We suggest that these should be set out in more detail – either as part of the vision statement, or as an accompanying overarching objectives section. It should be explained that these milestones will be incorporated into a Bill. It is important for there to be clear readthrough between the SBS and the Bill to ensure that a comprehensive package that can drive real impact.

We also suggest that the strategy includes an overall target for area-based restoration measures on 20% of Scotland's land and sea area by 2030, to align with the proposed EU Restoration Law.

Protected areas

The draft even fails to account for our very best natural treasure, our network of protected wildlife areas. These are our very best places for wildlife and we need them to be actively cared for, monitored and managed, and their benefits extended across landscapes through nature networks. Yet Protected Areas hardly feature in the draft strategy and, worryingly, the Scottish Government's commitment to protect at least 30% of Scotland's land and sea by 2030 ('30 by 30') isn't even mentioned, despite that target being a key deliverable of the government's approach to nature's recovery.

Whilst we understand that detailed plans for delivering '30 by 30' are currently being developed by NatureScot and will be set out in a separate strategy, we are surprised at the total lack of mention in this consultation document. '30 by 30' is a key policy mechanism that should be coordinated with all the other outcomes suggested in this strategy.

In addition, there are more generic actions needed to improve and maintain protected areas across Scotland that must form a key part of Scotland's biodiversity response. The protected area network is a cornerstone of biodiversity conservation in Scotland but not all protected areas are currently in good condition and steps are needed to secure monitoring and management for all sites: this is reflected in the draft strategy.

Conclusion

Scotland can be a leader in restoring nature. This strategy is a chance to make that a reality, but that requires turning ambition into action. We strongly suggest that unless the above recommendations are integrated into the strategy, then it will not result in any benefits for nature or move us along any further than existing strategies. If the above recommendations are included in the strategy, then it will stand a good chance of placing Scotland on a pathway to Nature Positive by 2045.

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