



January 2024

RSPB Scotland – Written Evidence to the Scottish Parliament’s Net Zero, Energy and Transport Committee

The Draft first 5-year Delivery Plan for the Scottish Biodiversity Strategy to 2045 - Terrestrial

RSPB Scotland thanks the Committee for the opportunity to give both verbal and written evidence on the terrestrial elements of the first 5-year Delivery Plan for the Scottish Biodiversity Strategy (SBS) to 2045.

The Delivery Plan is part of the overall Biodiversity Framework for Scotland, consultation on which closed in December 2023.

RSPB Scotland strongly supports the creation of this new Biodiversity Framework for Scotland.

The level of ambition in the framework and in the SBS represents a genuine step change in the Scottish Government’s aspirations around tackling the nature emergency. The tone and language signal a significant shift in government’s understanding, recognition and acceptance of the global biodiversity crisis and the fact that Scotland is a real part of it. All of the policies included in the framework are important elements of Scotland’s response to that nature crisis, and many are things that environmental NGOs, including RSPB Scotland, have been actively seeking and advocating for over recent years – this is a significant moment that we really welcome.

We see the Framework as signalling potentially transformative changes in public policy. Whether they materialise or not depends on whether the shortcomings outlined below are effectively addressed. It also critically depends on the Natural Environment Bill in 2024 and how, in particular, legally binding targets for nature recovery, as committed in the Bute House Agreement, are drafted, adopted and ultimately delivered. If the targets are sufficiently robust and ambitious, they could represent a critical step forward in bringing government and society together to finally tackle nature loss via cooperative action. If the targets agreed are too weak, they could presage a step backwards, becoming a ‘minimum required action’ that is insufficient to reverse losses in a complex and degraded living world. There is therefore a great deal to play for in a field with significant risks – but the opportunities for progress are unparalleled since devolution.

January 2024

We strongly support the following key elements of the Scottish Biodiversity Framework in principle, and urge that they are progressed in the following way:

1. **The Scottish Biodiversity Strategy and Delivery Plan**, this must instigate a comprehensive **National Programme of Ecosystem Restoration and Species Recovery**, and provide clear actions for different sectors and all parts of government to take on recovering nature.
2. The **policy frameworks for 30x30 and nature networks**. Together these policies represent a significant opportunity to scale up nature protection and recovery, and create ecological networks across Scotland. The frameworks must ensure that our best places for nature are not just lines on a map but are thriving and healthy and joined up across Scotland and put in motion immediate priority actions.
3. **Proposals for legally-binding nature restoration targets** to drive cross-sector and cross-government action to tackle the nature crisis. These targets are as important for nature as the net zero targets are for the climate. The targets must include specific targets for increasing species abundance and distribution, reducing species extinction risk, improving the extent and health of priority habitats and protected nature sites and tackling historical losses in nature.
4. **Proposals to strengthen National Park legislation** to support National Parks to lead action on nature and climate and demonstrate the benefits of this at a local level.

Notwithstanding these very welcome intentions and the positive direction of travel, we believe there are important omissions and shortcomings in the framework as currently drafted that will significantly undermine effective delivery and make the achievement of the Vision articulated in the Biodiversity Strategy unfeasible without significant improvements.

The section of the Framework that requires the most development is the Delivery Plan for the Biodiversity Strategy, due to the following issues:

- **The lack of SMART actions** (specific, measurable, achievable, relevant, and time-bound) - clarity must be provided on what must be done, by when and by whom. Many of the actions included are vague, and some are incoherent.
- **There is no prioritisation provided to guide delivery** – this is critical to ensure that delivery partners and funders are clear on the most urgent and important actions and to maximise collaborative delivery.
- **The delivery plan re-states actions that are already underway or committed to** under existing or forthcoming plans and policies – the delivery plan should be strengthened so that it creates significant added value.
- **Too many actions in the delivery plan signal the creation of more plans and strategies.** The Delivery Plan would be significantly improved if it focused mostly on tangible delivery actions.

- **There is a lack of clarity and specificity on the Programmes of Ecosystem Restoration and Species Recovery.** Biodiversity comprises species and ecosystems. Therefore, these shared national programmes must sit at the heart of efforts to drive nature's recovery. However, the draft delivery plan fails to include adequate steps for setting the programmes up. Much more clarity, substance and detail should be provided on how they will be structured, funded and rolled out.
- **There is a significant lack of clarity on how the key policies in the framework interact,** with each other and with wider public policy, and how they will be delivered in a strategic way across sectors.

Collective delivery and governance

Successful implementation of the SBS Delivery Plan and achievement of the vision and goals in the Biodiversity Strategy will require coordinated, collective delivery across a wide-range of sectors. The nature conservation sector itself will drive forward the bulk of the action and environmental NGOs like RSPB Scotland will be important partners in delivering against the Strategy through constructing the evidence base, policy development, accessing external funding and delivering conservation work on the ground. It is vital that the sector is aligned on priorities and coordinates for effective delivery of these priorities.

However, engagement with and strategic input from eNGOs and other non-government stakeholders during the development of the SBS and its Delivery Plan has been largely inadequate. The governance proposed in the SBS offers an opportunity for more effective and collaborative working on biodiversity. We welcome the explicit involvement of important delivery partners and that external partners will sit on the Operational Delivery Board. However, it is not clear whether key non-government partners will sit on the Strategic Biodiversity Council. We believe that environmental NGO leaders and other key stakeholders should be engaged at this level. If they are not, then this risks increasing divergence between the voluntary and public sectors in delivery against SBS.

Mainstreaming

To date biodiversity considerations have not been adequately mainstreamed across government and sectors. We urge further effort in this regard, and see **legally binding targets** for nature as pivotal in that effort and essential for driving change across all parts of Government and the economy. Whilst we know much more needs to be done to tackle the climate emergency, we have seen how the binding and ambitious Net Zero targets have led to climate change being mainstreamed into the consciousness of governments and sectors and seen as a priority. Without a similar approach for nature, we run the risk of a fragmented and insufficient, rather than unified and effective, response to the nature emergency. More information on why statutory targets are essential for driving nature's recovery and RSPB Scotland's views about what those targets

January 2024

should look like can be found in this joint Environment Links UK [briefing](#) and this Scottish Environment LINK [report](#). We are encouraged that the proposals for Nature Restoration targets in the Biodiversity Framework consultation aligned with many of the proposals in LINK's report.

Funding

RSPB Scotland warmly welcomes the overall maintenance of core nature funding under the recent budget announcement, especially in the context of wider financial pressures. In the years leading to 2030 and beyond, however, the delivery of the nature recovery vision articulated in the Scottish Biodiversity Strategy will require a significant uplift in resourcing. Creating a robust Biodiversity Investment Plan which sets out how the actions in the Delivery Plan will be funded – through public, private and blended channels – is vital and must be completed as soon as possible, with input from key delivery partners and other stakeholders. It is also vital that the scale and management of critical associated budgets - especially agriculture and woodland creation support - shifts in strongly favour of nature positive outcomes via agri-environment and the supported expansion of key native woodlands like Scotland's rainforest.

For further information please contact

Paul Walton, Head of Species and Habitats, [EMAIL REDACTED]

Nora Casey, Senior Parliamentary Officer, [EMAIL REDACTED]