

Response ID ANON-VB35-UVA4-Z

Submitted to **Developing an Environment Strategy for Scotland**

Submitted on **2018-08-24 15:21:56**

Questions

1 What are your views on the following draft vision for Scotland's environment and climate change policies?

What are your views on the following draft vision for Scotland's environment and climate change policies?:

The vision is very important in establishing the need to live within our environmental means, but the link to 'prosperity' underplays both the immediacy and significance of the challenges we face. The 2016 SEPA regulatory strategy, from which this vision is drawn, comments that "According to the ecological footprint measure, Scotland needs approximately three planets to sustain its current living." Does 'one planet prosperity' convey sufficient urgency about the tasks we all need to achieve to make progress from three-planet down to one-planet usage?

It is essential to focus on ambition, but we should temper that with a realistic assessment of the requirements.

2 What are your views on the following draft outcomes that will help to achieve this vision?

What are your views on the following draft outcomes that will help to achieve this vision?:

These draft outcomes provide a useful framework and direction for the principal environmental themes that we need to address.

However, we are surprised that the Strategy doesn't comment more overtly on what is needed for delivery, despite indicating in a section heading "How the Environment Strategy will be developed and how can you contribute?" Instead, the section observes that "We will take a whole-of government approach to developing the Strategy" and "...we will explore opportunities to strengthen our integrated approach to the sustainable management of our land and seas...". The section doesn't actually set out any material on how the readers can contribute. We feel that within a discussion document on Environment Strategy, there ought to be some room for debate around overlapping requirements. We comment on these in respect of items 1-6 below:

Points 3, 4 and 6: protection and management

Our biodiversity requires management, not just protection and we urge the inclusion of this critical word. There are virtually no unmanaged landscapes or habitats and thus species in Scotland, and even 're-wilding' is a management decision. The paper would be better for acknowledging the role for management of our biodiversity, as SNH does (for instance in Scottish Biodiversity Strategy - Route Map to 2020 Delivery Agreement 2015-2018), so to capture the skills and enthusiasm of land managers.

Points 3, 5 and 6 - engagement

Ensuring that people who are responsible for shaping biodiversity by their land management actions are encouraged to participate in shaping environmental strategy. The discussion document feels quite prescriptive, and therefore runs the risk that it is perceived as a Scottish Government owned, rather than a shared ambition.

Points 1 to 6 - delivery

Scottish Government won't achieve the strategic ambitions alone. Investment of time, money and resources will have to come from across the whole Scottish population, from public and private resources. The discussion document doesn't comment on the sense of partnership required to accomplish environmental objectives.

Points 3 and 6 - measures and monitoring

The discussion document observes that: "During 2019, we will develop a monitoring framework to track our progress in achieving the outcomes." We believe that work towards this framework must include the establishment of appropriate base-lines on which monitoring will occur. Our view is that there is substantial work to be done to ensure that any monitoring framework is properly calibrated. For instance, much is made of Natural Capital as a basis for assessment. Currently, SNH produces the Natural Capital Index which provides a national, top-down performance indication. However, we also need to be benchmarking ecosystems health at local scale (possibly catchment, landscape, or farmer cluster) to provide land managers with adequate direction on areas for improvement.

Point 5 - education and awareness

The strategy rightly identifies the importance of access to nature and valuing the environment. Within the strategy, there should be recognition that education and awareness have important roles to fulfil in building knowledge of, and appreciation for the environment. Better understanding should promote greater input at different levels to long-term sustainability objectives.

3 What are your views on the draft knowledge accounts which will be used to help identify priorities for action in the coming years? What additional sources of key evidence can you add?

What are your views on the draft knowledge accounts [LINK] which will be used to help identify priorities for action in the coming years? What additional sources of key evidence can you add?:

Access to nature – accompanying the available information on access to nature, we need to build education, awareness and respect, so we can monitor understanding about nature and its value to society. This will allow us to address any challenges presented in the ways we enjoy our access. For instance, research suggests some nature also requires respite from access, particularly at key times of the year, to remain resilient and valuable as an asset. Year round access to field headlands by walkers, dogs and horses is not compatible with resilient populations of farmland songbirds which define the countryside by their calls or support the best possible numbers of pollinators.

Business resource efficiency – it would be useful to test and implement incentives (or restrictions) to increase business focus on circular economy objectives.

Ecosystems and wildlife – the components for this knowledge account are detailed and progressive. We feel they need to be complemented by work to clarify base-lines at local level against which the maintenance or improvement of ecosystems and wildlife can be effectively monitored, particularly with regard to species. The danger is that without such benchmarking, forward strategies and management plans may be based on inaccurate species assessments. There is also a risk that we place emphasis on single species management when more broadly-based improvements (perhaps around local habitat and predator management, or single species that are suitable indicators for ecosystem health) could benefit a wide suite of birds or mammals.

Household resource efficiency - like Business resource efficiency, it would be useful to test and implement incentives (or restrictions) that increase a domestic focus on circular economy objectives. This might be cross-referenced with measures that monitor growth in education, awareness and respect for our environment. Are we providing the right schooling, training and broader education to secure progress?

Natural Capital – We require a framework for local benchmarking and monitoring of ecosystem health at catchment, landscape or farmer cluster scale, and a framework that encourages land managers to see payments for ecosystem services as a competitive market place with real economic value, and not simply as a public sector pay-out for not doing harm. We welcome the emphasis placed on Natural Capital metrics in both the main discussion document and supporting papers. However, we believe that there is a considerable amount of work to be done to establish measures that are relevant to businesses or to land managers. The Natural Capital Index is partly built up using information on the status of designated sites. Appraisal of site features is not regularly undertaken and represents only part of Scotland. Reliance on national monitoring and aggregate interpretation risks inappropriate action at local scale. A bottom-up approach would help to inform Natural Capital measures currently assembled at national scale. It would also help to identify appropriate outcomes for future agri-environment schemes which may involve local collaboration.

We ideally need more regular reporting of status on designated sites if they are to be fully valued as reference points for Natural Capital performance.

The Natural Capital knowledge account identifies the challenge in predicting Climate Change. We suggest that to help identify any trends, the regular update of Climate Change Risk Assessment reporting should be summarised in a simple Public Risk Register.

With significant evidence gaps, it is relatively easy for social media to publicise views that can immediately gain public traction. Wherever information gaps exist, we must acknowledge any lack of information that could affect our decision-making, and we must retain the objectivity to call for sufficient insight.

The Natural Capital knowledge account comments on the strong scientific underpinning of the forestry options within the Forestry Grant Scheme. Given the stated aim of Scottish Government to increase forestry and woodland planting to 15,000 hectares per annum, we are not certain how that fits comfortably with the objective of putting the 'right trees in the right places'. The possibility of substantial local distortion of species and habitats exists without careful planning. We would also welcome a more substantial evidence base to demonstrate the extent of net CO2 absorption across planting and harvesting cycles. For instance, is the mix of broadleaf and conifer planting appropriate to achieve long-term net absorption, and what might this imply for the articulation of future planting schemes?

Quality green space – we agree the importance of this knowledge account, particularly for housing design / urban planning. It would be particularly useful to build data that helps us understand the strength of health and wellbeing benefits emanating from green space.

Value the environment – we note the references to Natural Capital in this knowledge account. We refer to our earlier comments, particularly the need to assess ecosystems health at local level to avoid the risk of ill-fitting national management prescriptions.

As part of valuing the environment, we believe it is important to track public understanding and respect for nature. With improvements in appreciation, the more people can contribute to local and national environment strategies.

We feel there is considerable scope to develop suitable educational, vocational and public awareness programmes to deliver appreciation

About you

What is your name?

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Are you responding as an individual or an organisation?

Organisation

What is your organisation?

Organisation:

Game & Wildlife Conservation Trust

The Scottish Government would like your permission to publish your response. Please indicate your publishing preference:

Publish response with name

We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this exercise?

Yes

Evaluation

Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)

Matrix 1 - How satisfied were you with this exercise?:

Slightly satisfied

Please enter comments here.:

Concern that discussion on the whole spectrum of Environment Strategy is being handled by just a few questions.

Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this exercise?:

Very satisfied

Please enter comments here.: