

Introduction

The evidence of biodiversity loss

1 Using your own knowledge and the evidence presented, to what extent do you agree that there is a nature crisis in Scotland?

Please insert answer here:

It is clear that there is a nature crisis in Scotland. The consultation document highlights a number of statistics and examples which back up this assertion and it is good to see clear recognition of the problem. In recent years we have worked hard to highlight the wild salmon crisis, but we recognise that this is just one aspect of the wider nature crisis. The Scottish Wild Salmon Strategy was published in January 2022, and the following statement is from the Ministerial Foreword, by the Cabinet Secretary for Rural Affairs and Islands: "There is sadly now unequivocal evidence that populations of Atlantic salmon are at crisis point. Although the pattern of decline is repeated across the salmon's North Atlantic range, likely caused, at least in part, by the effect of climate change on survival during its marine phase, there remains much that we can do in our rivers and coastal waters to build resilience and transform the fortunes of this iconic fish for the better."

The same applies to our wider nature crisis. It is clear that biodiversity is lost due to largescale uses of our environment, such as in agriculture and commercial fisheries. This is exacerbated by the fact that we do not give enough consideration to the value of biodiversity in our planning and licensing decisions and subsequent regulation and enforcement. Whilst there is value in biodiversity helping us in mitigating and adapting to climate change, the consultation document does not place enough focus on the value of biodiversity to wider society. A comprehensive understanding of the benefits that derive from biodiversity and how those should be weighted in decisions on the use of the environment and natural resources in Scotland is what needs to change in order to reverse the current trend.

There appear to be very few metrics in relation to freshwater in section 2, despite the fact that this is heavily monitored by SEPA, Marine Scotland and fisheries managers. We would expect to see this addressed in the final version of the strategy. One other element that is not covered in section 2 of the consultation document is the serious decline in invertebrates. Apart from being important in their own right, these species are the foundation of our ecosystem and their decline is a strong indication that we have not properly managed our natural environment.

Incremental change has not succeeded in reversing biodiversity loss, and has not helped enough with mitigation of, and adaptation to, climate change. Transformative action is now required, not just to address pressures on the environment, but to fundamentally re-think how we license and regulate proposed activities and ensure that we properly regulate existing activities. Whilst the consultation document identifies that biodiversity loss is a significant issue, and sets out some proposed outcomes, it is fundamentally important that there is a step-change in effort to address the current crisis. This will require a significant shift away from the status quo and a far stronger emphasis on protecting and restoring the environment, and less of an emphasis on facilitating the use of our natural resources without contributing to the ongoing protection, restoration and management of the underlying resource.

Members of Fisheries Management Scotland are coordinating and delivering large-scale actions to protect and enhance biodiversity in Scotland, including riparian tree planting, specific habitat improvement work and peatland restoration. District Salmon Fishery Boards and Rivers and Fisheries Trusts are well connected with land-managers and with appropriate support, are uniquely placed to deliver at a catchment scale to address the nature crisis.

2 What do you see as the key challenges and opportunities of tackling both the climate and biodiversity crises at the same time?

Please enter response here:

We welcome the recognition that the climate and biodiversity crises are intrinsically linked, and we agree that these crises need to be tackled at the same time. However, it is disappointing that in several places the focus of the consultation appears to focus on addressing the biodiversity crisis as a means of addressing the climate crisis, rather than recognising the importance of protecting biodiversity in its own right. There is an overwhelming case for addressing biodiversity loss, regardless of whether the resulting actions contribute to sequestering or holding onto carbon (much as these are also important). On that basis, we consider that tackling the climate and biodiversity crises together where synergies exist is sensible and appropriate, but this should not be at the expense of protecting and restoring biodiversity in other situations.

The way we use land is critical to how Scotland responds to the climate and biodiversity crises, and relies on the appropriate management of Scotland's natural capital assets. This is an opportunity for those who own and manage land to contribute and to benefit, particularly if funding mechanisms are aligned with these priorities. There is an urgent need for the Scottish Government to set the right policies and funding mechanisms to support the delivery of biodiversity targets. The Scottish Forestry Grant Scheme is a good example of this. Whilst this scheme is effective for large scale forestry, it does not readily support small woodland creation and does not adequately support efforts to create targeted riparian woodland. Such barriers to accessing funding schemes, which would otherwise be beneficial to biodiversity, need to be considered and addressed if we are to make progress.

Funding for nature restoration has always been low in Scotland, compared to the scale of the challenge. The Green Finance Institute estimates £15 to £20 billion is required to restore Scotland's biodiversity. There needs to be greater investment in nature restoration and nature-based solutions which protect and enhance Scotland's natural capital. Effective, innovative funding mechanisms that incorporate public and private investment in a blended finance approach will be important in ensuring there are increasing financial flows invested in nature-based solutions.

The biodiversity duty in Scotland is, arguably, stronger than the biodiversity duty in any other part of the UK. There is also a requirement on public bodies

to report on their biodiversity duties. However, these processes do not work well in practice, and there is a lack of accompanying guidance to support public bodies in discharging this duty. If we are to truly mainstream addressing the nature crisis, we need to make the biodiversity duty more effective, as we are still losing our biodiversity.

Our strategic vision – framing and context

3 Is the draft vision clear enough?

No

Please enter comments here:

We consider that the draft vision is not clear enough. For example, we are not clear what 'substantially restored and regenerated' actually means in practice. Indeed, this is an issue throughout the document, which we hope will be addressed in the final version of the strategy and the subsequent implementation plan. There is a clear need to mainstream tackling the biodiversity crisis across the Scottish Government, but we are unclear on how this will be done in practice. If we are to achieve nature recovery within the timeframe of this strategy, we need specific, measurable and realistic targets.

The targets that underpin the Biodiversity Strategy are fundamental to its success. The strategy needs to have quantifiable specific targets, otherwise there will be no way of monitoring its success. SMART targets that match the key 2030 and 2045 milestones need to be included in the strategy. Such targets also form a useful way of monitoring progress in halting and reversing biodiversity loss.

With regard to monitoring, we cannot manage effectively what we do not measure: at the moment we do not measure biodiversity adequately in Scotland. However, there is a great deal of information on the freshwater environment which is not currently mentioned in the strategy. There is an urgent need to compile the information that is currently available and identify and fill any outstanding information gaps. Water courses and water bodies are the receptors of much of the evidence of biodiversity loss. They have a testing infrastructure in place of which more use could be made.

4 Is the draft vision ambitious enough?

No

Please enter comments here:

It is important to recognise that the declines in biodiversity identified in Chapter 2, have occurred despite major legal frameworks and associated plans such as the Habitats Directive, Birds Directive, Water Framework Directive, Marine Strategy Framework Directive etc. Whilst these initiatives are important, we must recognise that the current approach is failing and therefore a change in approach is required. There is a need to clearly reflect the fact that 'business as usual' will not be an option in future and that the planning, licensing and regulatory approaches will need to be reformed to reflect this.

As highlighted above, we welcome the clear articulation of the issue, but the remainder of the document simply does not reflect the seriousness of the issue and does not point towards meaningful solutions or suggest where the resources to effect those solutions will come from. We need to strive to match or exceed the ambition of the EU nature restoration strategy. It is important to highlight the scale of resource which will be required from both the public and private sector. An acknowledgement of the issue and clear commitment to implementing a strategic plan which is properly resourced is required if there is any chance of meeting the vision.

One of the key issues that the strategy needs to deal with is inappropriate development. At the moment our biodiversity is suffering from 'death by a thousand cuts'. 'Minor' impacts are regularly tolerated, resulting in cumulative impacts on our natural environment. For example, SEPA do not prioritise streams of less than 1m in width, and many pressures are given less stringent objectives in the River Basin Management Plan due to financial considerations. This approach is not compatible with building resilience in our natural environment. We need to have policy coherence — for example, we need to make sure that there are provisions in the new draft national planning framework that place a much stronger emphasis on protecting the biodiversity that we have, as we endeavour to restore already damaged ecosystems.

There appears to have been a great deal of consideration of the rural environment as part of the biodiversity strategy, but the ambition of this section of the document is not matched by the very short sections on the marine and freshwater environment, and the associated proposed outcomes, which we do not consider to be ambitious enough. It is not clear what the status of the infographics and associated text is, as these only appear for the rural environment and are absent for the other sections. This gives the strong impression that the other parts of the strategy are considered to be less important than the rural section.

5 Do you have any suggestions for a short strategic vision which would form the title for the strategy?

Please enter suggestions here:

Scotland's blueprint for restoring nature

How will we know when we have succeeded?

Scotland's rural environment – farmland, woodlands and forestry, soils and uplands

6 Do the 2045 outcome statements adequately capture the change we need to see?

No

Please enter response here:

We recognise that there are many different ways of brigading the outcomes that need to be achieved. However, as we highlighted during the development of the strategy, we do not agree with the approach set out in the consultation regarding the framing by broad landscape type. There are many examples of inter-relationships between these broad landscapes which in our view mean that they are the wrong way of setting out the strategy. We previously highlighted that salmon (as an example) are relevant to all of these broad landscapes and are impacted by pressures acting within all of these landscape types. In the consultation document, this approach has already led to an inconsistency of approach. For example, diffuse pollution is identified as a pressure on the freshwater environment, but not identified in the sections dealing with farmland, forestry or soils. In our view, we need to address biodiversity loss at an appropriate and ecologically-meaningful scale, and we consider that river catchments are the most appropriate scale for the terrestrial elements of the biodiversity strategy to be framed. We recently held a workshop to discuss this further and the suitability of river catchments for addressing biodiversity loss was highlighted by Dieter Helm, as well as a number of river managers. We would like to discuss this important point further in advance of the finalisation of the strategy.

We also note that Professor Sir Partha Dasgupta, in his report on "The Economics of Biodiversity" identified "perverse subsidies" as something that needs to be tackled, in order that policies are aligned to deliver for the climate and nature crisis. There is very little point improving habitats if Government subsidises activities that act against these initiatives.

The farmland section identifies increased use of pesticides and fertilizers as an issue, but we were surprised to see that there is no specific proposed outcome relating to the use of pesticides and fertilizers. Indeed, this is an issue throughout the document, and we consider that the identified issues should be clearly associated with outcomes within the strategy before the strategy is finalised. Where it is not yet clear what the specific outcome should be, the strategy should identify the process by which specific outcomes will be determined.

With regard to woodland expansion, it is important that the right tree is planted in the right place. Inappropriate woodland can compromise biodiversity, and there is an urgent need to support and incentivise the planting of native trees next to watercourses which will have multiple benefits for biodiversity, including freshwater and migratory fish. This important aspect is not covered in the freshwater section of the draft strategy.

As is the case throughout the document, SMART targets that match the key 2030 and 2045 milestones need to be included in the strategy. Such targets also form a useful way of monitoring progress in halting and reversing biodiversity loss.

7 Are the 2030 milestones ambitious enough?

No

Are we missing any key elements? Please enter response here:

In terms of broad ambition, we consider that this section of the document is the strongest and appears to have had the most consideration. However, there are a number of areas that we believe are lacking – the document is silent on extraction of peat for horticulture, a practice which is now proposed to be banned in England and should also be banned in Scotland. As highlighted above, we would expect to see outcomes relating to the use of pesticides and fertilizers, and targets for planting native trees next to rivers. Finally, the proposed outcomes for the rural environment do not adequately cross-reference to impacts on the freshwater environment. As we detailed above, we do not believe that the current approach to broad landscapes is sensible, but if this is the approach to be adopted, there needs to be clear cross-reference between the different sections.

8 What are the key drivers of biodiversity loss in this outcome area?

Please enter response here:

9 What are the key opportunities for this outcome area?

Please enter response here:

We believe that there is a key opportunity to make meaningful positive progress on addressing biodiversity loss if the strategy is delivered in an ecologically meaningful manner. We are strongly of the view that basing actions on a river catchment scale is the most coherent approach, and the fact that the infographics and associated text include several mentions of rivers and the riparian zone is welcome. It is disappointing however, that the statements that accompany the infographics are not properly reflected in the proposed outcomes. Rivers are the route by which impacts arising from farmland, woodlands, forestry, soils and uplands are transported to the lower catchment, and indeed into the coastal and marine environment. If we take a more holistic approach, seek to address biodiversity loss at a catchment scale, and ensure that support mechanisms and regulation support this, we believe this represents the greatest opportunity for success.

10 What are the key challenges for this outcome area?

Please enter response here:

Marine environment

11 Do the 2045 outcome statements adequately capture the change we need to see?

No

Please enter response here:

We consider that the outcome statements are disappointingly vague. It is clear that the marine section of the strategy has not received the same consideration as that for the rural environment and this needs to be urgently addressed in advance of publication. As is the case throughout the document, SMART targets that match the key 2030 and 2045 milestones need to be included in the strategy. Such targets also form a useful way of monitoring progress in halting and reversing biodiversity loss.

12 Are the 2030 milestones ambitious enough?

Are we missing any key elements? Please enter response here:

Whilst there has been some progress in developing a network of Marine Protected Areas, the associated management measures are not yet adequate to protect these sites. The wider pillars of the marine nature conservation strategy are lacking, and it is extremely disappointing that we still lack a comprehensive marine planning system, and adequate regulation of commercial sea fisheries, despite the Marine (Scotland) Act becoming law in 2010. Both Atlantic salmon and sea trout are designated as Priority Marine Features, but this designation has delivered no meaningful protection for these iconic species whatsoever. This is an issue that needs to be urgently addressed in the final version of the strategy, and subsequent implementation plan. One example of a measure which would protect marine biodiversity is the immediate banning of damaging and indiscriminate gill nets in Scottish waters.

13 What are the key drivers of biodiversity loss in this outcome area?

Please enter response here:

Scotland's Marine Atlas identifies two significant pressures on the Scottish marine area which are widespread:

- Human activity contributing to climate change
- Fishing, which impacts on the seabed and species

We would also highlight the impacts of fish farming and potential impacts of marine renewables, which we have failed to properly assess and consider, despite the recent leasing announcements for ScotWind.

14 What are the key opportunities for this outcome area?

Please enter response here:

A fully integrated network of marine protected areas, which are properly managed to protect and restore the designated features, coupled with a suite of wider seas measures, including protection of the seabed where necessary from extractive activities such as commercial fisheries and fish farming, in order to ensure that we have a well-functioning, biodiverse coastal and marine environment.

15 What are the key challenges for this outcome area?

Please enter response here:

Climate change and human activities.

Freshwater environment: rivers lochs and wetlands

16 Do the 2045 outcome statements adequately capture the change we need to see?

No

Please enter response here:

We consider that the outcome statements are disappointingly vague. It is clear that the freshwater section of the strategy has not received the same consideration as that for the rural environment and this needs to be urgently addressed in advance of publication. As an example, "The extent of restored [not defined] catchments and improvements in ecological status, lochs and wetlands [not defined] has increased [by how much – the scale of the task has not been defined]. In comparison, the European Biodiversity Strategy has set a target of restoring 25,000km of rivers to be free-flowing. The Scottish Biodiversity Strategy should set a similar goal, ensuring that it is sufficiently ambitious to lead to real change for freshwater biodiversity. This should include targets for freshwater species abundance and the quality of freshwater habitats.

As is the case throughout the document, SMART targets that match the key 2030 and 2045 milestones need to be included in the strategy. Such targets also form a useful way of monitoring progress in halting and reversing biodiversity loss.

The consultation document makes the following point: "The Scottish Environmental Protection Agency's (SEPA) monitoring shows that overall 64% of our rivers and lochs are in good or better than good condition in 2020. This is an improvement of 3 percentage points in overall condition since 2015. It is based upon assessment of water quality, flows and levels, physical condition and barriers to fish migration."

It is important to recognise that these figures take into account a range of areas where derogations have been applied, resulting in less stringent measures to protect or improve the environment. The RBMP process, and the achievement of GES does not necessarily equate to biodiversity improvement. This principle was recognised in the wild salmon strategy, where it was agreed that a further action was required to undertake assessments and assemble case studies to determine possible gaps where achievement of RBMP targets may not provide adequate protection for salmon at local and/or national scale. The same principle should apply to the biodiversity strategy, otherwise we risk normalising the status quo, rather than taking the transformational action that is required.

We welcome the reference to the wild salmon strategy. However, it is important to note that our freshwater resources are critical to our wider

environment and this is a much bigger issue that can be covered by the wild salmon strategy. For example, the area of rivers deemed to be accessible to salmon is only one part of the wider freshwater resource. Many other important aquatic species, inhabit parts of rivers which salmon do not, and these species are also in need of protection and restoration. Where possible, the aim of the strategy should be to restore natural processes, ensure free-flowing rivers and restore invertebrate and plant life. Whilst a great deal of work has been undertaken to include fish passage (primarily salmon) on weirs and dams, the remaining structures still impact on the natural function of the river.

The strategy needs a programme of ecosystem restoration, yet there is no ecosystem restoration plan in the consultation document. We would expect to see a number of additional outcome statements in the final version of the strategy – for example:

- Prevention of aquatic pollution, including point source pollution, sewage waste and diffuse pollution from agriculture, forestry and urban runoff.
- Removal of barriers (including culverts not yet identified), restoration of river channels and natural river processes such as connection with natural flood plains
- Specific measures to address the impacts of hydro-electricity generation, including the altered use of water resources as wind energy forms a greater proportion of the overall energy mix
- Provision of dappled shade to help cool all areas of Scotland's rivers identified to be at threat of climate induced heat stress by models developed by Marine Scotland Science from the river temperature monitoring network.
- Restoration of Scotland's damaged peatlands (with an appropriate target set out).
- Addressing water scarcity through robust regulation of water abstraction by all industries.
- Eradicate Invasive Non Native Species.
- Ensure that reintroduced and translocated species, such as beavers are appropriately managed to ensure that they do not impact on other species, such as salmon.

On the latter point, we are concerned about the way that beavers and salmon recovery have been lumped together in the consultation document, which gives the impression that these species are mutually beneficial. There are already many cases in Tayside where this has proven not to be the case, and the expansion of beavers in Scotland must be very carefully managed. We recognise that beavers, in the right location, can have a range of benefits for biodiversity, but their impacts are also well recognised and beavers will need to be carefully managed in future. The strategy must recognise this important point.

17 Are the 2030 milestones ambitious enough?

Are we missing any key elements? Please enter response here:

No. We would expect to see a number of additional milestones, as set out above

18 What are the key drivers of biodiversity loss in this outcome area?

Please enter response here:

The main drivers of biodiversity loss in freshwaters are:

Pollution - despite significant improvements in water quality one in eight rivers in Scotland remain classified as Moderate to Poor for water quality. Invertebrates and fish can be impacted by pollution from point sources such as waste-water treatment works and combined sewer overflows, or from diffuse sources such as run-off from agricultural areas. The impact of novel pollutants such as microplastics, pharmaceutical substances and pesticides is an increasing area of concern that is not adequately monitored currently.

Invasive Non-Native Species - INNS have been identified as one of the five principal drivers of biodiversity loss globally, and freshwater habitats are among the most vulnerable to INNS impacts. Investing in invasive non-native species biosecurity is much cheaper than subsequent large-scale eradications, and this should be the ultimate aim. As highlighted above, there should be a specific target in the strategy to eradicate INNS.

Land use change and development pressures - Relative to their size and extent, freshwater habitats are of exceptional importance for biodiversity. However, many watercourses are now disconnected from their floodplains, limiting their ability to adapt naturally to changing conditions. Artificial structures in rivers prevent the movement of gravels and sediments, regulate natural flows and block the upstream passage of migrating fish.

Climate change - Climate change is recognised as a major driver of change in nature, globally. In Scotland, it is causing widespread changes in the abundance, distribution and ecology of a range of wildlife. Freshwater habitats and species are particularly at risk. Marine Scotland Science have modelled the impact on increasing temperatures on sensitive species such as Atlantic salmon and invertebrates. Provision of dappled shade through large-scale riverside planting of native trees is urgently required, and appropriate funding mechanisms, including reform of the Forestry Grant Scheme, to support this vital work need to be put in place urgently.

19 What are the key opportunities for this outcome area?

Please enter response here:

The last few years have seen some exciting progress in the development and implementation of integrated catchment management approaches – with Fishery Boards and Trusts, land managers and other key stakeholders coming together to create unique partnerships that deliver multiple benefits. These include targeting tree planting in riparian areas in order to provide dappled shade and prevent climate-induced warming of water temperatures. If these initiatives can be accompanied with appropriate, targeted funding, including responsible private investment, the benefits to wider biodiversity would be substantial.

The River Basin Management Plan for Scotland, published last year, will address some of the issues in freshwater environments but is framed too

narrowly to achieve the required significant progress in this area. Planning for the next RBMP due in 2027 should begin now so that key actions can be identified and put in place from the start of the plan period. The National Planning Framework is an opportunity to ensure that floodplains, rivers and other freshwater habitats are properly protected from inappropriate development. In particular, the planning process should include more comprehensive assessments of the impacts of instream structures proposed for hydro-schemes and flood prevention works to ensure no detrimental effects to the full range of freshwater biodiversity.

There is an urgent need to accelerate the implementation of strategic and specific actions to manage catchments in ways that reduce freshwater pollution, improve water quality and restore natural flow processes. These interventions will both support nature's recovery, and help the freshwater environment become more resilient to the impacts of climate change.

20 What are the key challenges for this outcome area?

Please enter response here:

As highlighted above, incremental change has not helped us to reverse biodiversity loss – transformative action is now required, not just to address pressures on the environment, but to fundamentally re-think how we license and regulate proposed activities and ensure that we properly regulate existing activities. We require a significant shift away from the status quo and we need to place a far stronger emphasis on protecting and restoring the environment, and less of an emphasis on facilitating the use of our natural resources without developers contributing to the ongoing protection, restoration and management of the underlying resource.

As the effects of climate change increase it will exacerbate the effects of other drivers, e.g. low flows will concentrate pollutants, higher water temperatures will make freshwater habitats more hospitable for INNS, etc. It is essential that activities undertaken in the freshwater environment are future-proofed to provide resilience to freshwater environments, and to guard against unintended consequences.

We are strongly of the view that currently planned work to identify and remove unnecessary/ defunct structures, and rigorous enforcement to deal with unconsented works, must be accelerated. Preference must be given to schemes which utilise nature based solutions wherever possible.

Coastal environments

21 Do the 2045 outcome statements adequately capture the change we need to see?

No

Please enter response here:

We consider that the outcome statements are disappointingly vague. It is clear that the coastal environments section of the strategy has not received the same consideration as that for the rural environment and this needs to be urgently addressed in advance of publication.

22 Are the 2030 milestones ambitious enough?

Are we missing any key elements? Please enter response here:

No – see above.

23 What are the key drivers of biodiversity loss in this outcome area?

Please enter response here:

Human activities. The consultation document doesn't define where the coastal environments end and the marine environment begins. On that basis, many of our comments relating to the marine environment, could equally apply to the coastal environment. This again highlights the fundamental issue in the way that the draft strategy is set out. One issue that is absent from this section is the impact of fish farming, both on wild salmonid fish and important components of the benthic environment.

24 What are the key opportunities for this outcome area?

Please enter response here:

25 What are the key challenges for this outcome area?

Please enter response here:

Urban environments – towns and cities

26 Do the 2045 outcome statements adequately capture the change we need to see?

No

Please enter response here:

Please see our earlier comments. We have chosen not to respond to this section, as issues highlighted above also apply to how we plan, license and regulate activities in our urban environments.

27 Are the 2030 milestones ambitious enough?

Are we missing any key elements? Please enter response here:

28 What are the key drivers of biodiversity loss in this outcome area?

Please enter response here:

29 What are the key opportunities for this outcome area?

Please enter response here:

30 What are the key challenges for this outcome area?

Please enter response here:

Across our land and at sea – overall health, resilience and connectivity

31 Do the 2045 outcome statements adequately capture the change we need to see?

No

Please enter response here:

This section is focussed on nature networks, are we question whether this is compatible with the mainstreaming of efforts to protect and restore biodiversity. We are surprised that there is no reference to regional land-use partnerships, and their role in meeting biodiversity targets.

32 Are the 2030 milestones ambitious enough?

Are we missing any key elements? Please enter response here:

33 What are the key drivers of biodiversity loss in this outcome area?

Please enter response here:

34 What are the key opportunities for this outcome area?

Please enter response here:

35 What are the key challenges for this outcome area?

Please enter response here:

36 To what extent will these outcomes deliver the Vision?

What might be missing? Please enter response here:

It is important to emphasise that protecting and restoring nature is not optional if we want a functioning planet. Scotland's economic strategies have identified that we are reliant on our natural world and it is vital that Scotland's Biodiversity Strategy is truly mainstreamed across the Scottish Government, in a way that simply hasn't happened to date. The targets that underpin the Strategy are fundamental to its success and these targets need to be quantifiable and specific in order to monitor success. It is therefore vital that SMART targets that match the key 2030 and 2045 milestones are included in the strategy.

As highlighted above, we need to address biodiversity loss at an appropriate and ecologically-meaningful scale, and we consider that river catchments are the most appropriate scale for the terrestrial elements of the biodiversity strategy to be framed. We are strongly of the view that the strategy should be restructured in this way. Many of the issues impacting on nature are common to the broad landscape types identified in the strategy, and the current approach does not cross-reference adequately between sections. We would suggest that the Scottish Government host a specific workshop to reassess and refine the range of 2030 and 2045 outcomes, and to develop a series of specific SMART objectives which match these outcomes.

37 What evidence and information should we use to assess whether we have delivered the Vision?

Please enter response here:

See comments above regarding SMART objectives and monitoring.

The conditions for success

38 Have we captured the key enabling factors which are essential in order for our strategy to be successful?

Please enter response here:

Whilst the strategy does a good job of setting out the nature crisis, the remainder of the document does not reflect the seriousness of the issue and does not identify meaningful solutions. Transformative action is now required, not just to address pressures on the environment, but to fundamentally re-think how we license and regulate proposed activities and ensure that we properly regulate existing activities. This will require a significant shift away from the status quo and placing a far stronger emphasis on protecting and restoring the environment, and less of an emphasis on facilitating the use of our natural resources without contributing to the ongoing protection, restoration and management of the underlying resource.

We welcome the references to funding and responsible private investment, as we recognise that public funding alone cannot finance the transformative action that is required. With appropriate Government and Agency support, to ensure that the framework for such funding is appropriate, we believe that private investment in biodiversity, at an appropriate ecological scale, can make a huge difference to the current situation. Alongside this important work, we also need to focus on ensuring that 'perverse subsidies' do not act against the intent of the strategy. There are opportunities for biodiversity within current subsidies for agriculture and forestry for example, which can work with the biodiversity strategy. It is vital that these funding mechanisms are reformed to ensure that they meet Scotland's strategic needs, including supporting actions to mitigate climate change induced warming of our rivers through planting native riparian trees.

39 Are there good examples of enabling conditions in other strategies we could learn from?

Please enter response here:

40 Can you set out how you think any of the proposals set out in the consultation might help to eliminate discrimination, advance equality of opportunity and foster good relations?

Please enter response here:

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:

Fisheries Management Scotland

Please tell us if you are working in, or have previous experience of, an industry, employment or activity which you think is relevant to this consultation

please insert your answer in the text box:

Yes - see above

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

Publish response only (without 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 consultation exercise?

Yes

I confirm that I have read the privacy policy and consent to the data I provide being used as set out in the policy.

I consent

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 consultation?:

Please enter comments here.:

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

Please enter comments here.: