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Submitted to Scottish Biodiversity Strategy 2022
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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:

We strongly agree that there is a nature crisis in Scotland. The consultation document identifies many reports and key indicators that show that the nature crisis is fact. We also see this for our-selves in the waters around the Isle of Arran, where once abundant species and more widespread marine habitats are no longer present have been lost over recent decades.

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:

The consultation document identifies that we are failing to halt biodiversity loss but doesn't examine why this is.

A major, but resolvable, challenge is to do with decision making, which currently favours economic growth and development at the expense of biodiversity and nature. We already have many legisla-tive and policy drivers aiming to protect biodiversity and the environment that are not effectively im-plemented or enforced. In practice, the regulatory framework, as currently applied, enables and oversees continual damage to nature and biodiversity loss. Whilst there is room for improvement in legislation and policy, there is already much that could be done right now to start to halt and reverse biodiversity loss. What is lacking is political will and action.

Proper implementation of the principles like the polluter pays & the precautionary principle where preference for the least environmentally damaging technologies, would be a significant step forward step to protecting biodiversity.

Biodiversity loss and climate change are as a result of human activity, in particular driven by eco-nomic activities with their resultant environmental impacts. Obviously, there is a need to establish a resilient economy with resultant jobs and income, but the existing model is unsustainable and in particular favours large, influential corporate entities and industries that are more focused on profit than environmental sustainability.

There is the significant, linked problem of regulator capture of government departments and deci-sion making by particular sectors such that even existing environmental legislation and policy are not enacted or enforced. Examples of this can clearly be seen in parts of the commercial fisheries sectors and salmon aquaculture industry for example.

If Scottish Government is serious about addressing biodiversity loss, then decision making from a local to a national level needs to change so that it actively supports halting biodiversity loss and supports biodiversity recovery. Any amount of legislation, policy and strategies will be useless un-less the decisions that are made and the actions that are taken fundamentally change.

There also needs to be a fundamental change in the language that we use about the environment and biodiversity. In environmental impact assessments the environment is seen as a constraint, rather than an asset that needs to be nurtured. Whilst a seemingly small example, this very clearly illustrates how biodiversity, and the environment and biodiversity are viewed in the context of de-velopment and resource use.

Systems of economic valuation also need to change so that the environmental and biodiversity costs and benefits are properly accounted for. This is an opportunity to properly account for the value of biodiversity within development models and to underpin regeneration and development with more meaningful valuation of biodiversity costs and benefits.

Decision making needs to be made on the basis of the best science available with better sharing of, and public accessibility to data, which will be more cost effective on several fronts.

All this requires the Scottish Government to provide the leadership and commitment to make these changes happen and to generate a culture in which we all value the environment and biodiversity and acknowledge its fundamental importance to our wellbeing and, ultimately, survival.

Such change provides opportunities for a more sustainable future and growth in environmental jobs and economy examples of which already exist in Scotland and elsewhere. Tackling the biodiversity and climate crises at the same time is essential and, with the contribution of nature to climate change mitigation, makes sense. But care needs to be taken that technological measures to ad-dress climate change do not exacerbate biodiversity loss. Biodiversity is fundamental to tackling climate change and needs to be prioritised.

Our strategic vision – framing and context

3 Is the draft vision clear enough?

No

Please enter comments here:

No. The vision gives insufficient detail for people to understand what the Scottish Government hopes to achieve.

It is lacking clear, quantified, measurable targets. Word and phrases such as 'substantially' & "re-covery targets" need to be defined or removed. The word "substantially" dampens the ambition and leaves room for too much interpretation. How will substantial be measured ?
Without clear, robust, quantified goals and targets, underpinned by the best available science, the vision is meaningless.
We have had these sorts of visions for many years, for example the Scottish Government's vision for the seas ("clean, healthy, safe, productive, biologically diverse marine and coastal environ-ments, managed to meet the long-term needs of nature and people"), yet by the consultation docu-ment's own admission this had made little difference to the continual biodiversity loss that we see.

4 Is the draft vision ambitious enough?

No

Please enter comments here:

The use of ambiguous words and lack of clear, robust, quantified targets weakens the vision so as to make it effectively meaningless. The vision needs to establish sequential dates for progress with clear measurable targets. Simply focusing on an end date of 2045 implies an attitude of kicking the problem down the path.
How long do we have to recover biodiversity? The vision needs to set a clear target for halting bio-diversity loss and demonstrating progress with biodiversity recovery. We have failed to achieve all earlier targets, but there should nonetheless be a clearly defined date we are working to in the first instance. At the very least this should be 2030 which aligns with the new CBD global biodiversity framework, the Leaders Pledge for Nature end the final year of the UN decade of ecosystem resto-ration.
There need to be clear, quantified, goals and targets as to how halting biodiversity loss will be as-sessed. The measures and data we have currently are very broad scale and missing many com-ponents (as, for example, the 2020 Scottish Marine Assessment acknowledges).

It is also no good aiming at 2030 or 2045 before having a means to measure progress. History suggests that governments routinely miss environmental targets. We cannot afford to wait a dec-ade or so to discover that we have missed them again. Interim targets are needed which can be used to determine whether we are on the trajectory of meeting the longer term ambitions.

Habitat protection and restoration is often a slow process with tangible results appearing only years later. This means action needs to be taken now for any meaningful outcomes to be reached by 2030.

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

Please enter suggestions here:

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?

Not Answered

Please enter response here:

7 Are the 2030 milestones ambitious enough?

Not Answered

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

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:

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:

The outcome statements are meaningless without clear, robust, quantified goals and targets that explain and define what is meant by 'recovery', 'more resilient', 'increased resilience to climate change', health of water column and seabed habitats'. Only with these in place is it possible to be clear what the aspirations are and for Scottish Government to demonstrate that it has a clear un-derstanding of what it is trying to achieve.

It isn't clear if the water-column encompass physio-chemical criteria as well as biological, or what exactly 'seabed' habitats' encompasses - the physical habitat and associated sessile and mobile benthic fauna and flora?

There is a failure to acknowledge and set out the scale of degradation and loss that has happened in Scotland's seas and to frame outcome statements in response to this. What is the aspiration for recovery?

We are also concerned that marine and coastal issues are being considered separately. This only serves to reinforce the mental divide of these two realms, which are in fact intrinsically interde-pendent.

The Clyde no longer supports abundant white fish populations as it once did with consequent loss of significant economic benefit to recreational and commercial angling sector and related businesses. Inshore habitats have been damaged and degraded and benthic biodiversity has declined as a re-sult of the removal of the inshore limit prohibiting trawling and dredging. These past impacts and losses need to be clearly acknowledged because this is part of the evidence base that must be used to set future targets for biodiversity recovery, and understand the issues that need to be ad-dressed to tackle biodiversity loss.

Older reports provide evidence of a much more productive and biodiverse marine environment around Scotland's seas. This evidence is part of the information that must be used to make sure that the aspirations for recovery do more than try and retain the degraded status quo.

12 Are the 2030 milestones ambitious enough?

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

No, the 2030 milestones are not ambitious enough.

The milestones suffer the same problem as the 2045 outcome statements in that there are no clear, robust, quantified targets that define the milestones and will be used to monitor progress. Without this, the 2030 milestone statements are meaningless and call into question Scottish Government's seriousness in tackling the biodiversity crisis as it is unclear how action and progress is to be meas-ured.

Words and phrases such as 'improving' and 'significant impacts' need to be much more clearly de-fined with, as commented above, associated targets.

As described above, key elements centred on wider marine environmental health - alongside re-versing the decline of species populations - needs to be included in these outcomes. References to Good Environmental Status by 2030 are missing.

Ideally, the 2045 outcomes and 2030 milestones should serve as a roadmap to marine recovery, across all components of marine life, rather than be vague optimistic assurances.

Key elements that are missing include:
- Clear, robust, quantified targets that define improvement
- Lack of clarity as to what is meant by 'prevailing environmental conditions' and 'not significantly affected
- Recognition of the need for wider spatial management measures to support biodiversity recovery in Scotland's sea
- Specific commitment to protection for MPAs from damaging activities
- A commitment to achieving Good Environmental Status for Scotland's waters by 2030
- The re-establishment of a modern, inshore limit on bottom-towed fisheries to restrict damaging fishing from the coastal zones of our seas that are most vulnerable
- Fish catch quotas that do not exceed ICES recommendations on fishing at Maximum Sustainable Yield and stock levels do not fall below the biomass capable of providing it
- Mandatory remote electronic monitoring is in place across all commercial fishing vessels operating in Scotland's inshore waters.
- Preferential access for low impact fisheries embedded into national policy frameworks
- Fisheries management systems reformed to ensure meaningful representation for eNGOs and low impact fisheries
- Discarding and bycatch virtually eliminated, adhering to leading international standards

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

Please enter response here:

General
Unsustainable and destructive fishing practices and climate change impacts are the key drivers of biodiversity loss in this area. Open-net salmon aquaculture is also a key threat to wild salmonids and other marine invertebrates.
Harmful fishing practices as evidenced in Scotland's Marine Assessment 2020 estimated that over 90% of the seabeds around the Shetland Islands, the

Moray Firth, the Clyde, the West Highlands, the North Coast and the North East had all been disturbed, with 80% of Shet-land recording a high disturbance rate. The widespread environmental footprint of bottom-towed fisheries is contributing significantly to biodiversity loss. Dredging of inshore waters has resulted in significant degradation of maerl beds and other sea life which act as vital nursery grounds for shellfish and other species; whilst the discarding and bycatch of non-target species inherent within bottom trawling has contributed significantly to fish population declines.

Without radical action to impose restrictions on the scale of operation of both aquaculture and fisheries sectors through e.g. greater spatial management, these outcomes will not be achieved. We would expect to see the new Biodiversity Strategy suggest bold steps to reform how our seas are managed - recognising that they are in crisis and incremental, piecemeal approaches are no longer effective.

Governance
- A regulatory framework that enables and supports continued biodiversity loss by developments and activities.
- The use of impact on national status on Priority Marine Features as the threshold for signifi-cant affect in development and planning decisions is causing continued loss and degrada-tion of Priority Marine Feature habitats and species.
- The use of a closed-box approach to modelling to assess impacts of open cage salmon farms fails to acknowledge, account for and address further afield impacts from dispersion of waste and chemicals.
- Failure to effectively implement existing legislative requirements. For example:
- Lack of proper in-combination impact assessments for developments, such as lack of in-combination assessment for impact of sea lice from open cage salmon farms on wild salmon and sea trout.
- Regulator capture by certain industries influencing the decision-making process in favour of par-ticular sectoral interests. For example:
- Failure of Scottish Government departments to acknowledge and address the impact of mobile bottom trawl and dredge fisheries on benthic biodiversity and essential fish habitats Lack of spatial management that prioritises and supports biodiversity recovery
- Failure to acknowledge the contribution that Marine Protected Areas can make to supporting sus-tainable fisheries
- Failure to make use of the best science available to underpin decision making
- Failure to implement the precautionary principle.
- Removal of the inshore limit which prohibited bottom-towed mobile fisheries in Scotland's inshore waters
- Lack of robust fisheries management measures to regulate, manage and enforce fisheries, in-cluding fishing effort and fisheries by catch.
- Lack of community voice and community aspirations in decision-making about the marine envi-ronment and marine developments.

Activities
- Disturbance of the seabed by bottom-contact towed fishing gear which is widespread over most of Scotland's seabed. This is one of the most wide-spread direct impacts on seabed integrity and health.
- Water quality impacts from land and sea-based activities. Particular drivers:
- Open cage marine fish farms (the recommendations from the 2018 REC Committee par-liamentary report are still yet to be implemented)
- More localised coastal inputs, e.g. unregulated sewage discharges, insufficient sewage treatment infrastructure, farming and forestry-based run off.
- Persistent pollutants affecting marine mammals and other species
- Coastal development
- Noise

Wider environment
- Marine climate change influences as result of wide range of human activities.

14 What are the key opportunities for this outcome area?

Please enter response here:

Improved ecological, social and economic resilience, better enabling the marine environment and marine biodiversity to support sustainable use and economic growth in the future.

Through effective spatial management and activity-related measures, recover biodiversity within inshore waters and support more jobs and economic activity based around sustainable fisheries. An opportunity to support a move from low value, high impact fisheries to high value, low impact fish-eries. There is already evidence showing that reinstating an inshore limit to prohibit bottom-contact trawl and dredge fisheries would be a significant step towards recovering seabed habitats and as-sociated marine life communities and ecosystem function. This would also safeguard important blue carbon habitats. Alongside this, supporting a just transition to more sustainable, less impacting forms of fishing with better localised management approaches would provide greater employment and economic opportunities based on a recovered marine ecosystem and recovered marine biodi-versity.

Greater opportunities for community wealth building in local communities based around recovered marine biodiversity and associated marine ecosystem services.

Opportunity for cost-saving through improved collaborative working and sharing of data and infor-mation which could be taken forward at a regional level.

Representation of wider stakeholders and communities in fisheries-decision making leading to more equitable decision-making that reflects the public-ownership of fisheries and wider stakeholder and community aspirations.

15 What are the key challenges for this outcome area?

Please enter response here:

The Scottish Government short sightedly valuing economic growth over environmental health.
The Scottish Governments lack of will to stand up to the mobile sector of fishermen and to manage our inshore waters for the benefit of all of Scotland's people as they are obliged to do.
Changing the status quo. This requires a change in the Scottish Government's approach to how the marine environment is currently viewed and dealt with in order to address the issues raised in re-sponse to previous questions.

In terms of inshore fisheries, a key challenge is to enable a transition from the existing model of in-shore fisheries with dominance by mobile bottom fisheries to a system of less-impacting fisheries supported by effective spatial and fisheries management.

Moving away from the dominance and influence of foreign-owned open cage fish farm businesses to more locally-based, less impacting mariculture systems that are not reliant on toxic chemicals and feed from wild-caught, unsustainable sources.

Freshwater environment: rivers lochs and wetlands

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

Not Answered

Please enter response here:

17 Are the 2030 milestones ambitious enough?

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

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

Please enter response here:

19 What are the key opportunities for this outcome area?

Please enter response here:

20 What are the key challenges for this outcome area?

Please enter response here:

Coastal environments

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

Not Answered

Please enter response here:

22 Are the 2030 milestones ambitious enough?

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

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

Please enter response here:

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?

Not Answered

Please enter response here:

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:

No

We agree that ecosystem regeneration needs to happen at scale. However, the lack of clear, ro-bust and measurable goals and targets make the outcomes meaningless.

The use of Nature Networks would appear to be making the same mistake of relying on structure, process, and compartmentalization to address the issue of biodiversity loss. This will not by itself address the issues that are driving biodiversity loss, what is required is a fundamental change as to how nature and biodiversity are dealt with in decision-making and action.

Why are the outcomes only focused on the land, they should equally be applied to the marine envi-ronmental at appropriate marine scale. Regional marine planning already provides a mechanism to achieve this, but it is direction and leadership for the process and prioritisation of biodiversity recov-ery that is lacking.

This section is entitled “across our land and sea” and yet the outcomes do not reflect the connectivi-ty between the land and sea.

32 Are the 2030 milestones ambitious enough?

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

No. The 2030 milestones are not ambitious enough.

The lack of clear, robust and measurable targets for and to achieve the milestones makes them meaningless as they are currently written.

Yes. There are key elements missing.

The focus on Nature Networks fails to recognise that what is needed is a change in how the envi-ronment and biodiversity are viewed and treated.

The inshore waters around Scotland need to be specifically recognised as an ecologically important zone. Reinstating an inshore limit on mobile-bottom contact fisheries around the coast would estab-lish the basis for an inshore ‘nature network’ and support recovery of marine biodiversity and eco-system function.

The outcomes do not address the connectivity between land and sea.

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

Please enter response here:

As acknowledged in the 2020 Scottish Marine Assessment, bottom dragged fishing gear is one of the key drivers of biodiversity loss inshore. Despite this very little has been done to effectively limit the footprint of these fisheries. Many Marine Protected Areas are protected in name only, and those that do restrict mobile gear are still being illegally targeted.

34 What are the key opportunities for this outcome area?

Please enter response here:

Our inshore seabed contains vital habitats that many fish species for all or some of their life history, healthy habitats such as seagrass, oyster reefs and kelp clean water and protect the coast whilst also sinking carbon and providing vital fish habitat. Marine mud is a greater carbon store than all of Scotland’s peats and forestry combined. Protecting this inshore area would allow biodiversity and fish stocks to recover, and would protect carbon sinks

from further degradation, recovered seabed would increase commercially important fish stocks which would allow fishermen to diversify away from shellfish and improve food security. It is not sustainable for fishermen to rely only on shellfish. Scientists say that being left with predominantly low trophic level species in the sea (as is the case in many areas of the west coast) raises 'serious concern'

35 What are the key challenges for this outcome area?

Please enter response here:

To date the Scottish Government have a terrible track record with dealing with fisheries in our in-shore waters and have not shown any clear vision of how to recover our depleted fish stocks or the environment. It does not seem to matter what the science/consultation/reports say, the mobile sector have final say, and decisions are made to support those damaging fisheries at the expense of all else. This is evidenced clearly in the case of the Inner Sound pilot project where the local creelers sought a sustainability project which was rejected because the mobile fleet didn't want it, and more recently with the government's decision to remove discarding rules for the convenience of the nephrops trawl sector.

36 To what extent will these outcomes deliver the Vision?

What might be missing? Please enter response here:

Without clear, robust, measurable goals and targets it is entirely unclear what the outcomes will de-liver.

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

Please enter response here:

For the marine environment, the requirements, and targets for assessing Good Environmental Sta-tus would be an obvious place to start. Good Environmental Status could be applied at a regional marine level which would provide a degree of consistency for marine areas throughout Scotland.

Based on what is presented in the consultation document there is a very clear need for Scottish Government to develop appropriate metrics for improved and clear outcomes, and for there to be robust and measurable targets associated with them.

Existing biodiversity reporting criteria should feed into this but this needs to be improved to address gaps in information (such as those identified in the 2020 Scottish Marine Assessment).

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:

No

It is hard to see how the strategy will achieve anything unless Scottish Government establishes clear, robust and measurable outcomes and targets against which progress can be measured and which Scottish Government can be help accountable for delivering.

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?

Name:
Áine Purcell Milton

What is your email address?

Email:
aine@arrancoast.com

Are you responding as an individual or an organisation?

Organisation

What is your organisation?

Organisation:
Community of Arran Seabed Trust

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:

COAST's mission is to protect and restore a diverse, abundant and beautiful marine environment for everyone in Arran, the Clyde and Scotland.

We aim to:

improve the local marine environment for the benefit of everyone
ensure coastal communities have a say in the decisions that affect their seas
work to sustain the livelihood of those dependent on fishing and tourism
increase the popularity of Arran and the Clyde as a diving, watersports and tourist destination
educate future generations on the need for marine conservation and how to make a difference
To make this happen, we work on campaigns and projects that promote sustainable inshore fisheries and aquaculture practices and regulation, often as part of networks, like the Coastal Communities Network, and partnerships, like the Clyde Marine Planning Partnership.

We work with scientists, fishermen and the community to facilitate research that develops the knowledge base of our marine ecosystem, for effective decision-making to protect and restore valuable marine habitats and species.

We build local capacity and awareness for community-led marine conservation with innovative and participatory marine education and communications. We enjoy sharing our experience with other communities and building resources and experiences for everyone such as the COAST Discovery Centre, the Marine Mobile, exciting workshops and activities on the shore, local sea life videos or our Marine Education Resource Pack for teachers

The Scottish Government would like your permission to publish your consultation 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 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?:
Very dissatisfied

Please enter comments here.:

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

Please enter comments here.: