



Scotland's Strategic Framework for Biodiversity – RSPB Scotland's guide to responding

About the consultation

The Scottish Government is currently consulting on a new Biodiversity Framework. You can read the consultation paper [here](#). This consultation is hugely important and is the start of a big moment for nature. You can read more about what is happening and why it's so important in [this blog](#).

This is a chance to kickstart nature's renewal and it is vital that people have their say in how this is done.

This document sets out some ideas from RSPB Scotland to help inform your response to the consultation, but if you are responding please do add your own views and opinions too. We hope that this guide can help support our staff, volunteers, members and supporters to navigate and respond to this important consultation.

If you only have 5 minutes – our top five priorities

The best way to have your say is to respond through the [consultation hub](#), but if you don't have time to do this then you can send an email to the Scottish Government's consultation inbox: biodiversityconsultation@gov.scot.

We've highlighted what we think are the top priorities for the new Biodiversity Framework to deliver to help with your email.

The creation of a new Biodiversity Framework for Scotland is hugely positive. This framework is vital for tackling the nature emergency and there is a clear ambition throughout the framework to create a step-change in the scale and pace of action on nature, which is very encouraging. To achieve its aim of halting and beginning to reverse the loss of nature by 2030 and to restore and renew nature across Scotland by 2045, the Scottish Government must ensure the framework:

1. Brings Forward a Scottish Biodiversity Strategy and Delivery Plan that includes National Programmes of Ecosystem Restoration and Species Recovery, and clear actions for different sectors and parts of government to take for nature.
2. Creates a plan for effectively protecting and managing 30% of Scotland's land for nature by 2030 and delivering nature networks, to ensure that our best places for nature are not just lines on a map but are thriving and healthy and ecologically joined up across Scotland.
3. Sets ambitious, legally-binding nature restoration targets in a Natural Environment Bill that will drive cross-sector and cross-government action to tackle the nature crisis, with specific targets for increasing species abundance and distribution, reducing species extinction risk, addressing historic losses of nature and improving the extent and health of priority habitats and protected nature sites.
4. Supports and empowers National Parks to lead action on nature and climate and demonstrate the benefits of this at a local level, by strengthening National Parks legislation.



5. Has a clear focus on delivery and funding. All of the policies in the consultation are welcome, but to deliver the change for nature at the scale and pace needed, then on the ground action must quickly follow.

Please specify in your email whether or not you are happy for the Scottish Government to publish your response as part of their analysis of the consultation. Even if you do not want your response to be made public, it will be counted towards the consultation.

If you have more time – ideas for your response

The best way to have your say is to respond directly to the consultation. Anyone can do this through the [consultation hub](#). **You don't have to respond to every question** - you can just focus on the sections and questions that interest you.

Based on the analysis and views of RSPB Scotland we have prepared suggested answers for the questions we think are most important. These are just a starter if you need help – do change the answers or add in your own views!

Quick links to questions:

Part A: Scottish Biodiversity Strategy and Delivery Plan

- **Section Two: Scottish Biodiversity Strategy Delivery Plan**
 - [Q2a – accelerate restoration and regeneration](#)
 - [Q2d – protect nature on land and sea and beyond protected areas](#)
 - [Q2g – nature positive farming, fishing and forestry](#)
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Part B: Proposals for Legislation

- **Section Six: Statutory Targets for Nature**
 - [Q6a – placing targets on a statutory footing](#)
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- **Section Seven: National Parks**
 - [Q7a – purpose of national park authorities](#)
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- [Q7g – public bodies operation in National Park aims](#)
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Part A: Scottish Biodiversity Strategy and Delivery Plan

Section Two: Scottish Biodiversity Strategy Delivery Plan

Q2a: Have we captured the key actions needed to deliver the objective: accelerate restoration and regeneration

No. The ambition in the draft Delivery Plan is welcome, the evidence clearly shows the need for action to halt biodiversity loss and restore and regenerate nature and many of the actions set out are required. However, the Delivery Plan will not achieve the vision and objectives, as it is too vague and doesn't include enough guidance on prioritisation. This section fails to capture all the necessary actions to deliver the objective, it must be strengthened by:

- Making all of the actions 'SMART'¹, defining what the action is, who is responsible for delivering it, and by when.
- Ensuring that it creates added value from existing commitments and policies from the Scottish Government.
- Providing clear guidance on which actions are the top priority for delivery and how the actions link together.

The top priority for this section should be to introduce a programme of ecosystem restoration – the actions do not adequately set out how this will be done, the plan must specify a list of ecosystems that will be covered by the programme, funding models, governance, timings and responsibilities.

Q2d: Have we captured the key actions needed to deliver the objective: protect nature on land and sea across and beyond protected areas?

No. The ambition in the draft Delivery Plan is welcome, the evidence clearly shows the need for action to halt biodiversity loss and restore and regenerate nature and many of the actions set out are required. However, the Delivery Plan will not achieve the vision and objectives, as it is too vague and doesn't include enough guidance on prioritisation. This section fails to capture all the necessary actions to deliver the objective, it must be strengthened by:

- Making all of the actions 'SMART', defining what the action is, who is responsible for delivering it, and by when.
- Ensuring that it creates added value from existing commitments and policies from the Scottish Government.
- Providing clear guidance on which actions are the top priority for delivery and how the actions link together.

¹ Specific, Measurable, Achievable, Relevant and Time-bound



The top priority for this section should be to clarify how all of the key policies will be strategically delivered and spatially coordinated. Policies to protect 30% of Scotland's land by 2030, deliver nature networks, expand National Nature Reserves, drive nature regeneration in National Parks and deliver Biodiversity Enhancement through the planning system are all vital and welcome. However, they are closely related and must be delivered strategically. The delivery plan must set out how this will be done.

Additionally, this section should include actions to set new targets for improving the condition of protected areas, with a strategic programme to achieve this.

Q2g: Have we captured the key actions needed to deliver the objective: embed nature positive farming, fishing and forestry?

No. The ambition in the draft Delivery Plan is welcome, the evidence clearly shows the critical role that land- and sea-use sectors must play in halting biodiversity loss and restoring nature. Many of the actions set out are required. However, the Delivery Plan will not achieve the vision and objectives, as it is too vague and doesn't include enough guidance on prioritisation. This section fails to capture all the necessary actions to deliver the objective, it must be strengthened by:

- Making all of the actions 'SMART', defining what the action is, who is responsible for delivering it, and by when.
- Ensuring that it creates added value from existing commitments and policies from the Scottish Government.
- Providing clear guidance on which actions are the top priority for delivery and how the actions link together.

The top priorities for this section should be:

- Ensuring that the new Agricultural Support Framework is well designed and effective to support farmers to deliver nature- and climate-friendly farming.
- Ensuring that every farmer and crofter in receipt of support payments has undertaken a biodiversity audit and is taking key actions for nature arising from the audits.
- Including an action to scale up Scotland's rural advisory service, to ensure that farmers have access to quality advice on biodiversity conservation and restoration to help them deliver increased nature-friendly farming practices.

Q2j: Have we captured the key actions needed to deliver the objective: protect and support the recovery of vulnerable and important species and habitats?

No. The ambition in the draft Delivery Plan is welcome, the evidence clearly shows the need for action to halt biodiversity loss and restore and regenerate nature and many of the actions set out are required. It is well established that to do this we must restore ecosystems AND recover threatened and lost species. The Delivery Plan will not achieve the vision and objectives, as it is currently too vague and doesn't include



enough guidance on prioritisation. This section fails to capture all the necessary actions to deliver the objective, it must be strengthened by:

- Making all of the actions 'SMART', defining what the action is, who is responsible for delivering it, and by when.
- Ensuring that it creates added value from existing commitments and policies from the Scottish Government.
- Providing clear guidance on which actions are the top priority for delivery and how the actions link together.

The top priority for this section is to set out tangible steps for setting up a national programme of species recovery that will work alongside the rolling programme of ecosystem restoration to deliver targeted action for the species most threatened and most in need of conservation action.

Q2m: Have we captured the key actions needed to deliver the objective: invest in nature?

No. The ambition in the draft Delivery Plan is welcome, the evidence clearly shows the need for action to halt biodiversity loss and restore and regenerate nature and many of the actions set out are required. However, the Delivery Plan will not achieve the vision and objectives, as it is too vague and doesn't include enough guidance on prioritisation. This section fails to capture all the necessary actions to deliver the objective, it must be strengthened by:

- Making all of the actions 'SMART', defining what the action is, who is responsible for delivering it, and by when.
- Ensuring that it creates added value from existing commitments and policies from the Scottish Government.
- Providing clear guidance on which actions are the top priority for delivery and how the actions link together.

The top priority for this section is publication of a robust Biodiversity Investment Plan which sets out how the Delivery Plan will be funded.

This is urgent and the Delivery Plan must set out a deadline for publication. The Investment Plan must:

- Set out strategic priorities for public investment
- Set out proposals for incentivising responsible private investment in nature restoration
- Set targets for investment in nature from all possible sources

Section three: Nature Networks Policy Framework

Question 3a: Do you have any comments on the Nature Networks Framework?

Nature networks will be essential for making places for nature bigger, better and more joined up. However, the framework should more clearly set out what nature networks are and how they will be delivered.



The emphasis is currently on local authorities having nature networks by 2030, however, to be effective the networks need to collectively form a national Scottish Nature Network. The Scottish Government needs to play a lead role in supporting other stakeholders, in terms of resourcing and guidance, to ensure a robust ecological network is created.

Some priority actions that should be included in the Nature Network Framework are:

- Setting a target for a national nature network to be established by 2030, made up of local and regional networks.
- Ensure nature networks are designed in line with the concept of ecological connectivity rather than solely on physical connectivity.
- A clear governance structure setting out roles and responsibilities of different agencies and stakeholders and how the 'top down' approach will mesh with 'bottom up' approach.
- Reflection of the important role that charities and communities can play in the development of nature networks.
- Setting out that a key aspect of a national nature network should be to guide the location and design of biodiversity enhancement measures from development.
- Clearly setting out design requirements for nature networks to help those involved in their creation, recognising the diverse nature of Scotland's habitat, populations and priorities.
- Setting out measures of success that reflect nature restoration, recovery and ecological functionality and not simply physical connectivity.

Section four: 30 by 30 Policy Framework

Question 4a: Do you have any comments on the 30 by 30 framework?

The target to protect at least 30% of Scotland's land for nature by 2030 will be a vital part of this biodiversity framework, ensuring that more of Scotland is protected and restored for nature. Scotland has an opportunity to lead the way on 30 by 30, demonstrating how it can be delivered in a way that is genuinely meaningful for nature and in collaboration with Scotland's communities and stakeholders.

The focus on ensuring that sites are effectively protected and managed is welcome – it is vital that these places are contributing as much as possible for nature and not just protected on a map. The high-level principles and criteria are also welcome.

However, the framework should include clearer solutions and actions to address the challenges set out. The deadline for this target is only 7 years away and focus must move to delivery as soon as possible. The framework should identify a more comprehensive action plan for delivering 30 by 30, including urgent priority actions that can progress immediately.

Some priority actions that should be included in the 30x30 framework are:

- Setting new targets for improving the condition of protected areas.



- Creation of a strategic programme to improve the condition of protected areas, including establishing landowner and stakeholder groups to achieve this.
- Proposals for identifying new protected areas that would complete our existing networks of nationally and internationally important sites.
- Commitments from the Scottish Government for long term funding for management and monitoring of protected areas.

Part B: Proposals for Legislation

Section Six: Statutory Targets for Nature Restoration

Question 6a: Do you agree with this approach to placing targets on a statutory footing?

Yes. Evidence shows that we are facing a nature and climate crisis. Statutory targets for nature restoration will be essential for driving action from all sectors of the economy to help nature recover. This is as important as binding Net Zero targets have been for driving action on climate change.

It is sensible for the Natural Environment Bill to establish the high-level topics for targets, with more detail set out in secondary legislation. This will allow for appropriate flexibility.

Question 6b: Do you agree with the criteria set out for the selection of targets?

Yes

Question 6c: Do you agree statutory targets should include a combination of outcome targets and output targets?

Yes. A mixture of outcomes and output targets will be needed to drive effective action on nature restoration, however the outcome targets are the most important.

Question 6d: Is the list of potential target topics sufficiently comprehensive in terms of the focus of proposed target areas and overall scope?

Yes

Question 6f: Do you agree with the proposal to have the smallest feasible number of targets which reflects the complexity of nature restoration?

Unsure. Nature is complex and whilst steps should be taken to ensure that there isn't an unrealistic number of targets set, the focus should be on the right suite of targets for driving action on nature, rather than focusing too heavily on reducing the number of targets. At a minimum the Bill should require Ministers to set targets on:

- Increasing species abundance
- Improving species distribution
- Reducing the number of species at risk of local extinction
- Improving habitat quality and extent
- Improving the condition of protected areas
- Addressing historic nature losses



Section Seven: National Parks

Question 7a: Do you agree that the purpose of National Park authorities should be amended in order to emphasise the important leadership role that National Park authorities need to play in restoring nature and in mitigating and adapting to climate change?

Agree.

Amending the purpose of National Park authorities to encompass action on restoring nature and in mitigating and adapting to climate change is important. This will help to ensure that our National Parks are fit for tackling modern environmental challenges and ensure that National Parks play a leading role in showing how this can be done.

Question 7b: Do you agree with these suggested changes to the first National Park aim?

Partially Agree. The proposal is to split the first National Park aim into two, with one aim focused on nature and one aim focused on cultural heritage and built environment. Both aims are important, and splitting them will allow adequate focus on these areas in their own right. It is positive the aim will refer to the need to 'protect and restore' and to biodiversity and ecosystems. 'Natural heritage' is more widely understood and defined than 'natural assets' and should be retained.

Question 7g: Do you agree that public bodies operating within the National Park should have regard to the proposed National Park aims?

Partially agree. Yes, public bodies operating within the National Park should have obligations relating to the proposed National Park aims, however 'to have regard to' is too weak and should be strengthened so that public bodies are actively required to contribute to achieving the National Park aims when working within the parks.

Question 7h: Do you agree that public bodies operating within the National Park should have regard to the National Park principle?

Partially agree. Yes, public bodies operating within the National Park should have to comply with the National Park principle, however 'to have regard to' is too weak and should be strengthened to require public bodies to comply with the National Park Principle.

Question 7i: Do you agree that the duty on public bodies operating within National Parks should be strengthened so they have an obligation to support and contribute to the implementation of National Park Plans rather than having regard to these plans?

Agree