

Reversing the collapse in nature in Scotland – why the biodiversity strategy and statutory targets won't work

Description

The Scottish Government's consultation on Tackling the Nature Emergency ([see here](#)) closed on Thursday. It is yet another consultation that will have consumed vast amounts of time and energy but is unlikely to change much. This post considers some of the key reasons why the Scottish Government's proposals for nature restoration won't work. A second post will look at the specific proposals for the reform of Scotland's National Parks which I touched on in September ([see here](#))

Scotland's Biodiversity Strategy

For everyone who cares about nature there was very little one could disagree with in the final draft of the Strategy which accompanied and underpinned the consultation, apart from the section on investment which is designed to open the door for private finance. Who could object to the other three sections, – Accelerating restoration and regeneration, – Expanding and connecting protected areas and improving their condition – and – Nature-friendly farming, fishery and forestry?

The other good thing about the Strategy is that the Scottish Government is brutally honest about the state of nature in Scotland, citing evidence to show how biodiversity has collapsed. The Strategy also makes no attempt to justify past government actions to protect nature either before or since the creation of the Scottish Parliament. The Loch Lomond and Trossachs National Park Authority (LLTNPA) admitted the same in its discussion of the consultation on Monday: so far it has completely failed to reverse the decline in nature. That is a good starting point.

The fundamental flaw in the Strategy, however, then follows: there is no proper analysis the reasons for this decline in nature. The section on – drivers of biodiversity loss across land and sea-scapes – starts promisingly, with a description of how changes in farming practice has affected biodiversity, although it then fails to consider the technological and market developments that have driven this. Forestry and fishing, by contrast, are hardly mentioned and there is no attempt to describe how their practice has changed (e.g sitka mono-culture or salmon fish farms) and how this has impacted on nature. While recognising that much of the uplands is managed for sporting use, there is no mention of how the practices of sporting estates have changed, e.g the intensification of grouse moor management, the impact this has had on nature or what has driven this.

Then, instead of focusing on how to tackle the drivers behind the collapse in nature, the Strategy jumps to listing the outcomes it wishes to see. Like so many other Scottish Government policies and strategies the aspirations are laudable but the thinking magical: that we can change the world for the better by wanting something rather than tackling the material causes of the problem.

The fundamental flaw is encapsulated in one short sentence “At the heart of this strategy is collaboration”. This fails to recognise some people won’t co-operate and others can’t co-operate because their livelihoods depend on certain practices. That should have been obvious after the Scottish Government in June withdrew its proposals to designate 10% of Scotland’s seas as “Highly Protected Marine Areas” – a commitment, however, that still remains in the Strategy.

The problems with 30 x 30

Protecting 30% of Scotland’s land and seas for nature by 2030 is a great soundbite and one can understand how many conservation organisations have leapt on it as a means to increase the area of Scotland that is “nature positive”.

At present about 18% of Scotland is protected (as Sites of Special Scientific Interest, EU Natura sites etc) but around 35% of this land is officially in “unfavourable” condition despite years of effort to persuade landowners to do the right thing. Extending the amount of land in Scotland that is judged to be both “protected” and in favourable condition under the current system from c12% to 30% is just not going to happen, either by 2030 or 2045. The Biodiversity Strategy does not give NatureScot, the public authority responsible for the system, a single new power to make Scotland’s protected area system more effective.

The problems run far deeper than that, however. Currently protected sites protect “what is”, rather than “what could be” and often what is protected is just one aspect of nature, such as a plant assemblage or a bird species, rather than the wider whole. Hence in part why SSSIs have done so little to protect nature as a whole. The 30 x 30 commitment could make a real difference but only if it protected nature as a whole and prioritised the restoration of natural processes before human land-use. That is not on the table.

The 30 x 30 target is also a world one and few people seem to have stopped and thought whether this was appropriate to Scotland. Why only 30%, when 50% of Scotland is mountain/moorland ([see here](#)) and is, outside of the central belt, far less populated than England, the Benelux countries or large parts of the third world? If Scotland has the potential to provide more than our share of wind power to Europe, why not for nature?

The way land is used in the uplands illustrates further major challenges with implementing 30 x 30. A large percentage of land that is currently designated is in the uplands and substantial further areas are likely to be required to meet the 30 x 30 target. But how do you choose what upland to add? Do you take what are thought to be the best surviving bits for nature, which is how SSSIs and Special Areas of Conservation were selected but would be hard to do now not much is left, or do you add areas which have the most potential to improve?

A magical solution would be to include all land within our two existing National Parks and the proposed new one as “protected” and meeting the 30 x 30 but with the LLTNPA admitting nature has collapsed under its watch that is unlikely to wash with the public.

Overgrazing is the main reason for why our uplands are so nature-impooverished but why is one landowner going to reduce deer and sheep numbers to meet Scottish Government commitments if their

neighbour doesn't have to do so too? The problem is that any mechanisms that rely on voluntary collaboration to identify land and water that contributes to the 30 x 30 target are not going to work. 20 years of failure by Scotland's Deer Management Groups to reduce deer numbers provide plenty of evidence for that.

The answer to these questions is not explicitly given in the strategy but comes down to money. With public money in short supply, it appears the Scottish Government is hoping to create a market in biodiversity like that for carbon (NatureScot has people working on the issues). The idea is if it is made profitable enough to do so, landowners will do the right thing.

There are two major problems with this thinking. The first is some landowners are so rich that their private pleasure, e.g. shooting artificially high numbers of red grouse, will always come before financial incentives. The second is that why would financiers invest in nature unless this was to offset further destruction? The logic of markets is that restoring nature in Scotland would be a good investment if it opened the door to further development of the Amazon rainforest.

Trying to work out voluntary solutions to these complexities has already consumed large amounts of resource. In my view the main thing the Biodiversity Delivery Plan is likely to achieve is the creation of a new layer of bureaucracy in central and local government, public authorities and the voluntary sector accompanied by a hoard of consultants. For the uplands it would be far simpler and more effective if we reduced deer numbers in Scotland to 5 or less per kilometre, controlled sheep grazing better and stopped muirburn. That would result in local jobs. The Scottish Parliament has it within its powers to do that and, if it did so, it wouldn't be difficult to exceed the 30 x 30 commitment, nature would restore itself.

Statutory biodiversity targets

It was under New Labour that central government started to use targets as a means of imposing change on various parts of the public sector and that approach has continued under the SNP. One might have thought the growing list of failed targets for health, education, house building etc might have prompted a serious review of the approach, instead of political mudslinging. Instead, the Scottish Government is now proposing to enshrine targets for biodiversity, which have been around for some time, in legislation.

Statutory targets might make a difference if there were statutory means for meeting those targets (e.g. the nationalisation of land for nature) and if someone went to jail for not meeting them. But it is proposed these statutory targets should stand alone, just like those for carbon emissions which recent reports show have failed completely. It won't work and no more time should be wasted on a voluntary approach to statutory targets.

Targets, however, also have considerable dangers. So important have they become that both individual managers and whole organisations may be incentivised to falsify and distort information so they can claim their targets are met (thus protecting their own jobs and the jobs of others). They also distort the work of organisations to focus on the target rather than their wider responsibilities or to look at the bigger picture. A good example is provided by Scottish Forestry which, under pressure to

achieve Scotland's tree planting targets, had been paying landowners to plant trees where there is no need to do so and at considerable environmental and financial cost. BrewDog's Lost Forest provides a good example ([see here](#)).

BrewDog's Lost Forest also shows how targets can conflict with disastrous consequences. While one part of the Scottish Government through NatureScot is paying out money to BrewDog to restore damaged peatland, another part is through Scottish Forestry paying out BrewDog to dig up peat to plant trees. Both are being driven by the fact that the Scotland is behind on both its peatland restoration and tree planting targets. Crazy and time for a rethink!

The contradictions, however, run even deeper than that and go to the heart of the green agenda in Scotland. How do we increase renewable energy generation to reduce carbon emissions while also restoring nature? In order to make-up time on those failed statutory carbon emissions targets, the Scottish Government has made it even easier for renewable energy developments to go ahead under National Planning Framework 4.

The problem is that every new windfarm, hydro scheme, pump storage scheme and powerline has implications for nature in the uplands and the 30 x 30 target. There are some fundamental contradictions in trying to green and industrialise the countryside at the same time. Meeting statutory biodiversity targets will not resolve those contradictions and, while they might in theory help counterbalance the rush for renewables, in practice the answer is a foregone conclusion: there is far more money to be made out of energy than nature.

A radically different approach is needed to restoring biodiversity

It is important to distinguish the need to measure things such as the number and diversity of animals and plants from targets. Targets can also play a helpful role in thinking about what we need to do: the answers to the questions of how many pairs of golden eagles would there be in Scotland if they weren't a) illegally persecuted and b) if there was more food for them are worth knowing.

However, to rely on targets to achieve change is not going to work and, based on current experience, will result in significant adverse consequences.

The Biodiversity strategy and delivery plan that has been just subject to consultation is so woolly and lacking in concrete actions that will help restore nature that there is probably no harm leaving it as it is. What the Scottish Government needs to do now, however, is to shift its focus to a land-use plan for the whole of Scotland, one that for example ensures that renewable energy developments are in the right place and compatible with the restoration of nature, and create the legal and financial mechanisms to make work, instead of leaving everything to the market. The various pieces of legislation scheduled for consideration by the Scottish Parliament over the next year could be used as the means to make those changes.

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