

Nature Division
Directorate for Environment and Forestry
Scottish Government
Victoria Quay
Edinburgh
EH6 6QQ

Tuesday 13th December 2023

To whom it may concern,

Consultation Response: Tackling the nature emergency - Consultation on Scotland's Strategic Framework for Biodiversity

Scottish Renewables is the voice of Scotland's renewable energy industry. Our vision is for Scotland to lead the world in renewable energy. We work to grow Scotland's renewable energy sector and sustain its position at the forefront of the global clean energy industry. We represent over 340 organisations that deliver investment, jobs, social benefit and reduce the carbon emissions which cause climate change.

Our members work across all renewable technologies, in Scotland, the UK, Europe and worldwide, ranging from energy suppliers, operators and manufacturers to small developers, installers, and community groups, as well as companies throughout the supply chain. In representing them, we aim to lead and inform the debate on how the growth of renewable energy can provide solutions to help sustainability heat and power Scotland's homes and businesses.

Scottish Renewables (SR) welcomes the opportunity to provide our view on the Scottish Government's consultation Scotland's Strategic Framework for Biodiversity. We have opted to provide our response within this letter.

In response to this consultation, our members have highlighted the following key points which are covered in further detail in the below consultation questions:

- A broader, more holistic approach to the delivery of habitat management and biodiversity enhancement schemes is needed. The inclusion of nature into mainstream wider policy would utilise extended stakeholder engagement while providing much-needed biodiversity enhancement guidance for developers. This joint approach would

help to facilitate an efficient approach to tackling the joint nature and climate emergencies.

- Industry must be consulted on further biodiversity policy and legislation to ensure guidance to facilitate the successful mainstreaming and implementation of nature policy is produced. There is a distinct lack of reference to renewable energy deployment within the Scottish Biodiversity Strategy, and the solutions it offers to help reverse the decline in biodiversity, both directly through biodiversity enhancements and indirectly through combatting the effects of climate change by reducing our reliance on unsustainable fossil fuels and reaching net-zero.

Scottish Renewables would be happy to discuss this request in more detail if required.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Morag Watson', with a long horizontal flourish extending to the right.

Morag Watson
Director of Policy
Scottish Renewables

CONSULTATION QUESTIONS

Chapter 2

Question 2a: Have we captured the key actions needed to deliver the objective: accelerate restoration and regeneration?

SR members agree with the key actions in principle, but further clarity is required on how the proposed key actions will achieve the objective in practice and what supporting actions will be required as a result.

Question 2b: Are the key actions, to support the objective: accelerate restoration and regeneration, sufficient to put Scotland on track to ending the loss of biodiversity by 2030?

SR members seek clarification on future, potential Other Effective area-based Conservation Measures (OECMs), the level of protection that can be expected within these areas, and what the renewables, and OECMs interaction of policy will look like. Renewable energy projects make a significant contribution to enhancing and restoring biodiversity via project habitat management plans, ecological surveys & monitoring and through biodiversity enhancement. Therefore, additional restrictions on renewable energy projects should be avoided, to enable renewable energy habitat management plans to continue to contribute significantly to achieving the objective.

Members support the proposed Register of Ancient Woodlands, including the definition of 'protected and restored' condition and support for landowners to protect and restore priority ancient woodlands. There is an opportunity to confirm best practice principles through the expected updates to The Right Tree in the Right Place guidance as outlined within the NPF4 delivery programme. The Scottish Government could do more to support Scottish Forestry to see this document successfully delivered. This would support other best practice guidance including the recently updated UK Forestry Standards.

Furthermore, we call for the Scottish Government to revisit the Control of Woodland Removal policy. This policy is considerably out of date and currently causes significant issues for renewable projects looking to positively contribute to nature. Compensatory planting is currently required for the loss of commercial forestry because of developments. This policy should be delivered by the replanting of native broadleaves, rather than mono-culture plantations. Effective biological enhancement comes from woodland restoration, not just expansion, as most woodland is in poor ecological condition. Allowing restoration as part of biodiversity enhancement for projects would open large areas of land for enhancement and simultaneously support halting and reversing nature loss. Planted woods on ancient woodland sites (PAWS) could provide an excellent opportunity for the renewable energy industry to

restore key habitats such as ancient woodlands while making additional land available for enhancement.

Onshore wind developments are in a unique position to support landowners with the restoration of forestry and other native habitats. A broader, holistic approach could be taken to the delivery of habitat management or improvement schemes. This would provide particular benefit with off-site opportunities, such as enhancing existing areas of native and Ancient Woodland, to provide wide scale, connected habitats, rather than the current practice which results in a patchwork of isolated habitat management schemes delivered in or around individual windfarms. SR members welcome larger-scale biodiversity enhancement schemes with more coordinated plans which provide less focus on individual onsite biodiversity enhancement.

Question 2c: Which actions do you think will have most impact?

No response

Chapter 3

Question 2d: Have we captured the key actions needed to deliver the objective: protect nature on land and at sea across and beyond protected areas?

SR members welcome the Scottish Government's intention to develop a biodiversity metric by adapting the Defra metric currently used in England, so it is applicable to Scotland, particularly with regards to peatland. The Defra metric favours an approach to peatland which hinders the restoration of degraded habitats, with peer-reviewed restoration techniques resulting in a negative biodiversity enhancement score for developers. A Scottish metric should learn lessons from the Defra experience and address these shortcomings. Members also call for guidance over whether the new metric will be required to be adopted by all local authorities. If it does, timelines will need to be shared on when the new metric becomes the standard position across Scotland.

In addition to the improvements needed with regards to peatland, the new Scottish biodiversity metric should adopt a place-based approach to biodiversity enhancement, as called for by NPF4. A biodiversity metric will never fully capture the interactions that exist in our ecosystems. Weaknesses of a metric include the determination of the proxy type, bias, inaccuracies which skew calculations, and arbitrary values. Any new guidance to ensure consistent application of NPF4 Policy 3 should recognise the value of adopting a place-based approach, which would include selecting enhancement measures suitable for the site and development characteristics in question. In adapting the Defra metric for Scotland, it should address these key issues.

Any metric used must also apply to both biodiversity and habitat area, with values assigned to actions that contribute to improved biodiversity, including monitoring programmes and artificial installations of biodiversity enhancement. There needs to be a balance or appropriate weighting in the metric so that, for instance, certain proposals are not always favoured and other proposals that may have benefits for biodiversity are overlooked or never taken forward because the proposals would not yield as many 'biodiversity units' as some other option. A problem with some existing metrics is that certain proposals for a site may only provide a small number of biodiversity units and so are not favoured. This could also stifle further innovation in novel biodiversity enhancement plans or proposals.

National guidance on Policy 3 within NPF4 and how the requirement for achieving biodiversity net gain is measured and evidenced is urgently required. Despite this urgency, it remains essential that this guidance is consulted upon by industry and other stakeholders. We also seek clarity on whether the guidance on the protection and sustainable use of soils relates to peatland soils.

We welcome the confirmation that land protection does not mean removing people or all activity from this land. Increasing the area currently designated as protected from 18% to 30% without considering the implications for the infrastructure that will be required to meet net zero will undermine the government's ability to meet its legal obligations. The exclusion of renewable energy development from protected areas would further reduce the potential land available for future projects. Our members further emphasise the need for clarification on the previously mentioned OECMs and how they will interact with renewable developments.

We highlight that designation of protection alone does not equate to biodiversity gain and focus should be given to maintaining and improving current designated protected areas over simply increasing the percentage of protected land, as intended by the UK Government through the National Environment Bill in 2024.

We do not agree with the requirement for projects to demonstrate financial securement. This has never previously been a requirement as the need to comply with conditions is robust enough to give determining bodies confidence that developers will comply. The need to demonstrate financial securement is therefore an unnecessary addition. Industry is already required to submit habitat management plans and EIA mitigation measures as part of the consenting process. The emphasis should be on demonstrating that these are being carried out. It is also essential that the policy does not require or suggest that long term biodiversity commitments exceed the life of a renewable energy project as such conditions cannot be complied with.

The Strategic Framework contains little on improving the effectiveness of existing site designation and protected species provisions, including the Habitats Regulations. This is a need for proportionate impact assessments and much clearer expectations from Scottish Government on HRA derogations (including strategic compensation).

In the short term the Scottish Government should:

- act to support the swift passage of regulations to allow Marine Recovery Funds (at UK and Devolved Administration levels) to operate and apply to live projects by the end of 2024.
- Confirm that non-like-for-like strategic compensation measures are permissible where these demonstrably contribute to securing Good Ecological Status.
- Frontload meaningful Statutory Nature Conservation Bodies (SNCB) engagement to discuss HRA Appropriate Assessment findings, agree compensation measures, and prepare compensation plans during the pre-application period. Structured processes (e.g. Evidence Plans) need to underpin this.
- Develop new delivery mechanisms at pace to unlock strategic compensation. These mechanisms need to be applicable to ScotWind projects.
- Allow a realistic and pragmatic framing of additionality and a broad interpretation of eligible compensation measures, including those aimed at improving overall marine ecosystem resilience.
- Acknowledge that strategic compensation is not a panacea and may not be appropriate in all cases so a fixed approach should not be mandated.
- Introduce clear and objective policy tests to judge the adequacy, appropriateness, and acceptability of proposed compensation measures (whether at the strategic project level) on a consistent and robust basis.
 - Such tests should include allowing ecological monitoring and adaptive management to qualify as eligible compensation measures, especially where a derogation is required on account of it not being possible to rule potential in-combination AEOSI beyond reasonable scientific doubt.

In the longer-term, Scottish Government should:

- Undertake reforms to streamline site designations focused on delivering better outcomes for nature with less procedural complexity, caselaw burdens and associated legal risks.
- Undertake integration of the legal tests in the Habitat Regulations and associated caselaw with wider consenting processes, rather than operating in silos. Consenting should focus more on establishing Imperative Reasons of Overriding Public Interest

(IROPI) for a project to balance ecological protections with wider policy imperatives as the primary test, rather than evaluating the suitability of compensation measures.

Question 2e: Are the key actions, to support the objective: protect nature on land and at sea across and beyond protected areas, sufficient to put Scotland on track to ending the loss of biodiversity by 2030?

We welcome actions and objectives from the Scottish Biodiversity Strategy that align with COP15 pledges for 30 by 30. Emphasis should be put on the effective management of protected land to ensure that these areas of designation are delivering successful biodiversity gain. Several terrestrial designations are not fulfilling their full potential, and, in some instances, renewable energy can assist with this through funding mechanisms or active management measures. Further clarification is needed on the action regarding the planning and development measures for protecting and enhancing biodiversity. There is reference to NPF4 and the identification of “several key actions which will ensure NPF4 secures positive effects”, one of which is the publication of new guidance to support the delivery of NPF4. Further information is needed on this to understand how renewable energy projects can best align with the Scottish Biodiversity Strategy.

Question 2f: Which actions do you think will have most impact?

SR members welcome the decision to focus marine biodiversity enhancement within the 37% of seas that fall within an existing marine protected area, rather than designating new areas of protection.

Chapter 4

Question 2g: Have we captured the key actions needed to deliver the objective: embed nature positive farming, fishing and forestry?

SR members are supportive of the intent of the actions but would welcome confirmation on whether the Scottish Government has engaged with the fishing industry to obtain stakeholder views across the short-term and long-term impacts of the planned fisheries measures. A clear explanation of the long-term benefits compared to the short-term impacts should be outlined.

Question 2h: Are the key actions, to support the objective: embed nature positive farming, fishing and forestry, sufficient to put Scotland on track to ending the loss of biodiversity by 2030?

No response

Question 2i: Which actions do you think will have most impact?

No response

Chapter 5

Question 2j: Have we captured the key actions needed to deliver the objective: protect and support the recovery of vulnerable and important species and habitats?

SR members welcome the revision of the Scottish Biodiversity List of species and habitats that are considered to be of principal importance for biodiversity conservation in Scotland. Members also welcome the proposed review of NatureScot's licensing approach for species conservation and management and would appreciate opportunities to engage through both of these processes.

Question 2k: Are the key actions, to support the objective: protect and support the recovery of vulnerable and important species and habitats, sufficient to put Scotland on track to ending the loss of biodiversity by 2030?

No response

Question 2l: Which actions do you think will have most impact?

No response

Chapter 6

Question 2m: Have we captured the key actions needed to deliver the objective: invest in nature?

SR members highlight the existing challenges the renewable energy industry is facing when competing against the likes of carbon credits.

Question 2n: Are the key actions, to support the objective: invest in nature, sufficient to put Scotland on track to ending the loss of biodiversity by 2030?

SR members support the actions outlined and feel that if implemented properly, they have the potential to contribute to halting and reversing biodiversity loss but would recommend consultation with industry on the proposed mechanism. Onshore renewable development can be used as an enabling tool towards the Scottish Government's ambition to restore 250,000 hectares of degraded peatlands by 2030, eliminating the need for land use competition.

The Biodiversity Investment Plan provides a great tool with which to strategically direct funding to projects that will have the most impact for nature. The development of the investment plan could be tied to biodiversity enhancement. For example, the strategic priorities for the investment plan and priorities for enhancement could be combined to deliver the best for

nature. These strategic priorities should also align with the Scottish Biodiversity Strategy targets and statutory nature targets.

Members would support further development of the woodland and peatland carbon codes and regulation of the voluntary carbon markets and would welcome further full explanations of both codes to ensure that these codes are used purely to offset carbon rather than as an opportunity for profit.

Question 2o: Which actions do you think will have most impact?

SR members welcome the proposed investment in green skills and nature-based opportunities. As widely reported, the renewables sector is currently experiencing an industry-wide shortage of green skills. We welcome training of professionals in nature management, restoration and enhancement, in line with the requirements of NPF4. Members encourage the partnership with the Onshore Wind industry, potentially via Scottish Renewables, for skills and training programmes both for industry and the public and volunteer sector.

The Biodiversity Investment Plan is also highly endorsed by members. Members feel it would be beneficial to align the development of high-integrity, value-led markets for responsible private investment in natural capital, with the development of public funding streams for biodiversity, including new agricultural support payments and peatland action. In addition to this, members support Increase investment in Scotland's Marine Environmental Enhancement Fund (SMEEF) and the benefits delivered to Scotland's coasts and seas.

Chapter 7

Question 2p: Have we captured the key actions needed to deliver the objective: take action on the indirect drivers of biodiversity loss?

SR members agree with the actions outlined, abiding the following alterations. While it is important that nature is included in wider plans and strategies, as through the suggested inclusion of nature into mainstream wider policy, it is equally important that nature plans, policies, and guidance are not written in silos. Members highlight the recent peatland guidance produced by NatureScot without consultation, which the Scottish Government's Peatland Action Advisory Group has agreed is not fit for purpose and must be revised. This is not an example of mainstreaming nature policy.

SR members would like to further highlight the lack of reference to renewable energy deployment and the solutions it offers in combatting climate change, an indirect driver of biodiversity loss. Efficient mitigation of climate change can only be achieved if renewable energy developments are rolled out as quickly as possible to achieve Net Zero targets and reduce reliance on unsustainable fossil fuel usage.

Question 2q: Are the key actions, to support the objective: take action on the indirect drivers of biodiversity loss, sufficient to put Scotland on track to ending the loss of biodiversity by 2030?

SR members reiterate the comments made to the previous answer 2p, highlighting the need for consultation to ensure industry input into policy guidance to facilitate the effective mainstreaming and successful implementation of nature policy.

Furthermore, members would echo previous comments made regarding the role that renewable energy development already plays as nature-positive developments in the contribution to Scotland's net zero targets. Renewable developments help reverse the decline in biodiversity, both directly through biodiversity enhancements (now required under NPF4), and indirectly through slowing the loss of biodiversity due to climate change - one of the biggest drivers of biodiversity loss.

Question 2r: Which actions do you think will have most impact?

SR members call for the development of a climate change audit or impact assessment approach for marine policy-making to ensure the most recent evidence is taken into account by 2028.

Nature Networks Policy Framework

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

SR members think that, if properly resourced and implemented, Nature Networks could be a valuable tool for developers to ensure that connectivity forms a key part of mitigation, compensation and enhancement work. Nature Networks must tie to planning and development as mentioned within the NPF4. The Nature Networks Framework highlights the connection to the NPF4 regarding strengthening habitat connectivity within and beyond developments, but does not clarify how this will work in practice. Issues could arise concerning the enhancement of Nature Networks assessed at the development sites level. In these instances, Nature Networks spatially defined by local authorities should allow developers direct opportunities to enhance or execute Nature Networks, in order to facilitate a strategic and meaningful process that translates from local to regional and national level.

Members also call for clarity on how the mainstreaming of nature policy will connect local authority Nature Networks to other local and regional plans, and how these Nature Networks will interact with further renewable developments.

Members highlight the importance of creating a central repository for environmental data in Scotland, as committed to through the Onshore Wind Sector Deal. By developing standardised monitoring approaches and data collection management, central repositories can be used not only for environmental impact assessments, but for academic studies and monitoring the progress of work to halt and reverse biodiversity loss.

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

SR members express concern over land availability following further designation of 12% of Scotland's land to meet the 30 by 30 target. However, members appreciate that this is a global commitment and therefore call for clarity on the level of protection and potential exclusions for renewables within these areas of designation. While developments would typically avoid designated areas, there should be a level of flexibility in policies and a more dynamic approach to protected sites' management where projects encroach on the edges of sites through instances such as access tracks or oversailing lines. Scottish land is a finite resource, and thus integrated land uses should work collaboratively to utilise limited land availability and support the progress conveyed throughout NPF4.

Members call for more clarity on the intended approach to OECMs and the level of protection afforded to them. We understand they need to be effectively protected but renewables should not be excluded entirely.

Members further highlight that the condition of protected sites is an important issue, with only 65% of designated features assessed as being in favourable condition last year. There is an opportunity for the restoration of unfavourable SSSIs to become locations for biodiversity enhancement requirements. Developments, such as renewable energy projects, which actively contribute towards the 30 by 30 target via community benefit funds and habitat management plans, should be supported under the Framework. Members would encourage NatureScot to connect developers and owners/occupiers of sites in unfavourable conditions. Developers could restore those sites and fulfil biodiversity enhancement requirements and owners/occupiers would be supported to ensure sites are in a good condition.

Question 5a: What are your views on the accuracy and scope of the environmental baseline set out in the environmental report?

SR members feel the baseline appears to be appropriate for the strategic nature of the report and we welcome the inclusion of climatic factors.

Question 5b: What are your views on the predicted environmental effects as set out in the environmental report?

No response

Question 5c: What are your views on the reasonable alternatives as set out in the environmental report?

SR members highlight that focus on a flagship species is useful for nature and environmental communication, and we agree with the overall conclusion that Option FS2 is the most appropriate assessment criteria, as it allows a broader measure of habitat and biodiversity improvements rather than focussing efforts on specific well-known species, which may not result in an overall biodiversity gain.

Question 5d: What are your views on the proposals for mitigation and monitoring of the environmental effects set out in the environmental report?

SR members support the intent of the proposals and identifying triggers for initiating intervention when required. We recommend that the trigger is more relative to the time it would take for the habitats listed to grow and/or be restored. Therefore, a 2 or 3 year basis may be more appropriate than a yearly basis. This time frame would also help to account for external factors, such as seasonality and weather anomalies, for example, harsh winters. The proposals for mitigation and monitoring of the environmental effects should be supported by adequate resourcing.

Question 5e: Do you think that any of the provisions in the SBS or Delivery Plan will have any adverse effects on business?

Question 5f: Are there any additional actions or changes to existing actions which can be taken through the Delivery Plan to benefit business?

SR reiterates comments made within answers to questions 3a and 2n. There is a need to balance the necessary required protections of biodiversity with the need for renewable energy developments. The Delivery Plan must avoid an outcome that leads to the reduction in areas available for renewable development and increases competition for those remaining areas. There is a requirement for both land uses to be considered together and one should not necessarily exclude the other. Clarification as to whether these initiatives can act alongside renewable energy developments would be welcomed. as renewable energy developments are fundamental to tackling the climate crisis which is a direct contributor to biodiversity loss.

Question 5g: Do you think that any of the provisions in the SBS or Delivery Plan will have any adverse effects on socio-economic equality?

No response

Question 5h: Are there any additional actions or changes to existing actions which can be taken through the Delivery Plan to benefit socio-economic equality?

SR members highlight there are no details within the framework regarding the renewables industry's responsibility for socio-economic equality and therefore it is difficult to determine if these actions are fit for purpose.

Question 5i: Do you think that any of the provisions in the SBS or Delivery Plan, will have any adverse impacts on people with protected characteristics?

No response

Question 5j: Are there any additional actions or changes to existing actions which can be taken through the Delivery Plan to benefit people with protected characteristics?

No response

Question 5k: Do you think that any of the provisions in the SBS or Delivery Plan, will have any adverse impacts on island communities?

No response

Question 5l: Are there any additional actions, or changes to existing actions, which can be taken through the Delivery Plan to ensure that there are no adverse effects for Island communities?

No response

Question 5m: Do you think that any of the provisions in the SBS or Delivery Plan, will have any adverse impacts on child rights and wellbeing?

No response

Question 5n: Are there any additional actions or changes to existing actions which can be taken through the Delivery Plan to benefit child rights and wellbeing?

No response

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

SR supports placing targets on a statutory footing to ensure that there is a legal obligation to ensure they are delivered. However, we emphasise that there needs to be a concerted effort to ensure that targets are meaningful. Furthermore, prior to their placement on a statutory footing, the Scottish Government needs to ensure plans and strategies consider potential statutory targets in their design.

SR members seek confirmation that the proposed set of detailed targets, with indicators and values, will go out for further consultation beyond the Scottish Biodiversity Programme Advisory Group and NatureScot's Scientific Advisory Committee prior to being laid before

parliament. Industry will need to be consulted to ensure that it is possible to comply with them in practice.

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

SR members support the criteria for the selection of targets. SR highlights particular support for the SMART target framework and the synergy with existing and forthcoming Scottish Government legislative frameworks and strategies. However, members highlight ensuring alignment between UK and Scottish law is a higher priority than alignment with the EU's environmental standards. The criteria set out within the targets remain high-level, and therefore more information is needed to determine if they are truly fit for purpose for renewable energy developments.

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

SR members support the statement that statutory targets should include a combination of outcome targets and output targets and agree with the proposal to not include input targets as monetary value is not appropriate and would not measure what impact the money has achieved.

However, members reiterate that preference is for targets to be set which relate to improvements in the quality of habitats rather than arbitrary targets for areas, which could result in large areas of low-quality habitat being created or protected.

Members have also highlighted that targets should be government-led but allow developers the freedom and flexibility to achieve the output and outcome targets in the most appropriate way in consultation with statutory consultees and relevant bodies.

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

SR members welcome the extensive list of potential target topics and further support that this list is neither exhaustive nor definitive.

Question 6e: Do you have any other comments on the list of potential target topics?

SR would like to highlight the overlapping target topics in the list, this is not necessarily an issue but just a consideration. For example, ecosystem integrity is quite overarching and will likely overlap with targets for many of the components that make up ecosystem integrity.

SR members welcome the intention for further consultation on targets and request the opportunity for comment either directly or through Scottish Renewables.

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

SR members agree that the smallest feasible number of targets directly linked to the nature restoration project itself would be a good approach and support the proposal to have overarching targets set in legislation to reflect the complexity of nature restoration. More numerous, small intricate targets would be more difficult to implement within legislation. However, SR would highlight that overarching targets should not interfere with more intricate efforts at a policy or planning level.

Question 6g: Do you agree statutory targets should align with the 2030 and 2045 timescales set out in the Strategy?

SR members agree that statutory targets should align with the 2030 and 2045 timescales set out in the Strategy but highlight that targets should be achievable given the 5/6 years available to fulfil them, and should be reviewed every 5 years. Furthermore, interim targets should be retained to drive forward action, and published within government documents including the Scottish Biodiversity Strategy Delivery Plan.

Question 6h: Do you agree the Bill should allow for the review of statutory targets?

SR members agree that the review of statutory targets would be beneficial to ensure they are effective and achievable. However, any potential changes to the targets should be justified and approved by the Independent Review Body and should not allow the reversal of ambition in a similar vein as we have seen recently in England.

Question 6i: Do you agree that reporting on targets should align with existing Biodiversity reporting requirements?

SR Members agree that reporting on targets should align with existing biodiversity reporting requirements to ensure consistency and streamlining of legislation, but highlight that it is important that this alignment does not create bottlenecks from increased workloads and reliance on other relevant departments or bodies.

Question 6j: Do you agree that an Independent Review Body is needed to report on Government's progress in meeting the statutory targets?

SR Members think it would be beneficial to appoint an Independent Review Body to report on the Scottish Government's progress towards statutory nature targets, operating in an equivalent manner to the Climate Change Committee.

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?

No response

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

No response

Question 7c: do you agree with the suggested change to the second National Park aim?

No response

Question 7d: Do you agree with the suggested change to the third National Park aim?

No response

Question 7e: Do you agree with the suggested change to the fourth National Park aim?

No response

Question 7f: Do you agree that the National Park 'principle' set out in section 9(6) of the 2000 Act should be retained? This would mean that, if there is a conflict between the National Park aims, greater weight should be given to the first aim which would seek to protect, restore and enhance the natural assets, biodiversity and ecosystems within the National Park.

No response

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

No response

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

No response

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?

No response

Question 7j: Do you agree with the proposal that National Park Authorities should be able to enforce byelaw breaches within National Parks by issuing fixed penalty notices rather than referring them to local Procurators Fiscal?

No response

Question 7k: Do you think that any other changes should be made to the general powers of National Park authorities?

No response

Question 7l: Do you agree with the proposed changes to the governance of National Parks?

No response

Question 7m: Do you have any other comments that you would like to make about the aims, powers and governance of National Parks?

No response

Question 8a: Do you think that any of the proposals in Part B, will have any adverse impacts on human rights?

No response

Question 8b: Are there any additional actions, or changes to existing actions, which can be taken through the proposals in Part B to ensure that there are no adverse effects for people's human rights?

No response

Question 8c: Do you think that any of the proposals in Part B, will have any adverse impacts on people with protected characteristics?

No response

Question 8d: Are there any additional actions or changes to existing actions which can be taken through the proposals in Part B to benefit people with protected characteristics?

No response

Question 8e: Do you think that any of the proposals in Part B will have any adverse effects on socio-economic equality?

No response

Question 8f: Are there any additional actions or changes to existing actions which can be taken through the proposals in Part B to benefit socio-economic equality?

No response

Question 8g: Do you think that any of the proposals in Part B, will have any adverse impacts on island communities?

No response

Question 8h: Are there any additional actions, or changes to existing actions, which can be taken through the proposals in Part B to ensure that there are no adverse effects for Island communities?

No response

Question 8i: Do you think that any of the proposals in Part B, will have any adverse impacts on child rights and wellbeing?

No response

Question 8j: Are there any additional actions or changes to existing actions which can be taken through the proposals in Part B to benefit child rights and wellbeing?

No response

Question 8k: Do you think that any of the proposals in Part B will have any adverse effects on business?

No response

Question 8l: Are there any additional actions or changes to existing actions which can be taken through the proposals in Part B to benefit business?

No response

Question 8m: What are your views on the accuracy and scope of the environmental baseline set out in the environmental report?

No response

Question 8n: What are your views on the predicted environmental effects as set out in the environmental report?

No response

Question 8o: What are your views on the reasonable alternatives as set out in the environmental report?

No response

Question 8p: What are your views on the proposals for mitigation and monitoring of the environmental effects set out in the environmental report?

No response