

Written evidence from the Institute of Environmental Management and Assessment on The Scottish Government's Biodiversity Strategy 2022

About IEMA

IEMA is the professional body for those people working in environmental management and in corporate sustainability roles. IEMA's growing membership of over 18,500 professionals work at the interface between organisations, the environment and society in a range of critical roles (for example from sustainability directors through to climate change leads and in consultancy and advisory roles). We also work with a range of corporate partners. Our professional members are active across all sectors in the UK, for example from construction and manufacturing through to logistics, facilities, and across financial, retail, food, consultancy and the wider service and public sector.

Executive summary

The need for a Scottish biodiversity strategy is clear and proposals put forward in this consultation provide a good foundation however further work is required on targets and measurable outcomes, funding and how the strategy will be delivered, which are all aspects that are largely absent at present. This makes it hard to understand the ambition and the potential efficacy of the strategy.

IEMA's submission is restricted to addressing the questions posed in sections 3 and 4 (where we have answered generally across all the sections) – this I where we have the most relevant insights – and recommend the following:

- Use natural capital as a way to talk about biodiversity and nature within this strategy
- Consider including the concept of biodiversity net gain as a tool for nature restoration
- Ensure all stakeholders, especially local authorities, are brought into the strategy, including actions to encourage collaboration and buy-in from the bottom up
- Give more information about how the strategy will be delivered including how to finance biodiversity actions and offsetting
- Align the strategy with national and international activities to make it easier for environmental professionals, businesses and other stakeholders to act

3. Our Strategic Vision – Framing and Context

- Is the draft vision clear enough?

There are no specific targets or measurable objectives and terminology such as 'substantially restored' and 'richly diverse' does not provide a defined quantity. This makes it hard to fully understand the ambition of the strategy.

The language does not give a sense of a biodiversity crisis. This is not to say that the language should be emotive or create panic, but the strategy lacks a sense of urgency.

- Is the draft vision ambitious enough?

The high level and sometimes ambiguous language makes it hard to fully understand the ambition of the strategy.

Nature is an economic resource and should be treated as such (but not only as an economic resource of course). Natural capital should be adopted as a way to talk about biodiversity and nature within this strategy.

There is no mention of biodiversity (or environmental) net gain in the strategy. Biodiversity net gain is a key way to conserve and restore biodiversity and its role should be considered.

4. How will we know when we have succeeded (general answers that are relevant across all the sections)

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

The strategy is very high level and we feel that it could have provided more detailed aims. The priorities are not visible and it is hard to see the actual impact of the suggested actions. At present the strategy does not provide the clarity and confidence that businesses, environmental professionals, local authorities and communities need in order to effectively engage with it.

There is very little mention of the role of local authorities in contributing to Scotland's biodiversity challenges. Local authorities influence land use significantly and should be a key stakeholder in the strategy.

Although the strategy briefly mentions several stakeholders across the text, there is no mention of the need for collaboration between, for example, farmers, land owners, local authorities and developers (and noting that they may have different ideas of what biodiversity means). Collaboration is essential for the successful implementation of a biodiversity strategy and should be better considered in the strategy.

The strategy does not include how it will be delivered and how it will be paid for. Although this is a high-level document, some information about execution and funding would be useful to understand the practical application of the strategy.

- Are the 2030 milestones ambitious enough? Are we missing any key elements?

The milestones are unclear for all the reasons above – weak language, no specific targets, no explanation of enacting or funding the strategy. Targets might have included the percentage of habitats (for example, woodland and forest or grassland or rivers and streams or specific subsets therefore) or species to be restored.

There is mention of other initiatives overseen by the European Union and United Nations, but there is limited explanation of intended alignment or otherwise. In a UK context, there is no mention of alignment with the work of the Department for Environment, Food and Rural Affairs in this area. Alignment could be useful for professionals and businesses (e.g. developers) working nationally and internationally. Alignment would result in less confusion and less bureaucratic issues.

There is also no mention of biodiversity markets and offsetting, which is a key mechanism for biodiversity conservation and restoration. There are currently no standards for this type of market and this needs to be addressed in order to be effective and to avoid any potential green washing.

- What are the key opportunities for this outcome area?

As mentioned above, there is an opportunity to align with UK and international activities. There is also an opportunity to align, as far as possible, with net zero and circular economy issues. Although biodiversity should be tackled in its own right, it should not be viewed in isolation from wider environmental and climate action that is required. There could be an opportunity to align policies and create synergies.

There are opportunities in the strategy to drive change through regulation, incentives and to provide case studies of 'what good looks like' to support stakeholders to conserve and restore biodiversity.

- What are the key challenges for this outcome area?

One of the challenges will be to make the business case for biodiversity, beyond regulation. Case studies and information to support professionals could help.

There is generally a lack of clarity for reporting in terms of what to report, what metrics to use, baselines, and what to measure and how. Organisations and individuals may not have the resources to undertake this extra work and if they do have the resources, they might not have the skills. Addressing these factors will be key.

There is no mention of funding to deliver the strategy and if this is to come from biodiversity markets and private investment then there are many challenges here with regard to incentives for businesses to get involved, standardisation of the market, and the avoidance of greenwashing.

Where some stakeholders might have the will to act voluntarily, others might not have the resources (even if they do want to act), while others again might not be interested in acting and will require incentives.

Some stakeholders might consider that there is already too much administration as a result of regulation and that implementing the biodiversity strategy will create more of this. Talking to stakeholders beyond this consultation, specifically on delivery, taking a bottom-up approach should help to gain buy in.

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