

Riverwoods Guide to Answering “Section 2: Scottish Biodiversity Plan” of the Strategic Framework for Biodiversity Consultation

Purpose: The purpose of this document is to provide talking points to Riverwoods partners and beyond on the relevant key actions supplied by the recent strategic framework for biodiversity consultation. These points are particularly relevant for addressing questions related to Section 2, objectives 1, 2, and 3 but can be woven throughout a wider consultation response, particularly in relation to section 3: Nature Networks Policy Frameworks and Section 4: 30 x 30 Policy Frameworks.

The consultation deadline is December 14th. We urge all Riverwoods partners to participate, as the consultation's outcomes will significantly impact Riverwoods' effectiveness for years ahead. Currently, the Strategic Framework for Biodiversity underrepresents the role of riparian woodland and river restoration. More voices emphasizing this issue can drive change in future updates.

Partners are not obliged to address every question. For those with limited resources, responding to questions 2b, 2e, and 2h in Section 2, which align with objectives 1, 2, and 3, is most crucial.

Objective 1: Accelerate Restoration and Regeneration

On Nature Based Restoration Targets:

We are very supportive of the general direction toward introducing statutory nature restoration targets, as this demonstrates the Scottish Government's commitment to tackling the biodiversity crisis. However, we must ensure that all targets meet the SMART criteria, which means they should be Specific, Measurable, Achievable, Realistic, and Time-bound. Ambiguity in statutory targets can lead to postponing action and delivery, risking meeting the overall goal of halting biodiversity loss by 2030. As a crucial keystone habitat for protecting terrestrial and marine species, we believe it is crucial that a statutory target be set for riparian woodland specifically. The James Hutton Institute has identified 175,000 ha as having potential for river woodland in Scotland. The Scottish Government should develop specific targets and associated support mechanisms to ensure that river woodland is created in such suitable areas.

On A Programme of Ecosystem Restoration:

Regarding introducing a programme of ecosystem restoration, while we broadly support actions to restore priority ancient woodlands, Scotland's rainforest, and identifying six large scale landscape restoration areas, there is a concern that protecting small pockets through restoration fails to examine the wider national picture, is disjunct from government's commitment to the use of nature networks for connecting landscapes, and fails to acknowledge the importance of supporting new creation.

We would like to see the Scottish government working alongside Riverwoods partners to develop a strategic approach, and framework for funding and delivery of river woodland. While more detail is needed on the six large scale landscape restoration areas, for maximum cross-habitat benefit, there is a need for these areas to focus on catchments and include significant riparian woodland restoration. Consultation with Riverwoods partners who are developing a pipeline of potential river woodland and river restoration projects is advisable.

Note: We strongly recommend that Riverwoods partners put forward their delivery projects in this section to be considered as one of the 6 landscape scale restoration projects.

On Source To Sea:

There is a notable disconnect in the delivery plan between freshwater and marine actions and integration of a source to sea approach is required, especially when considering the role of freshwater contaminants on marine and coastal ecosystems. As highlighted by NatureScot's recent 2023 Research Report 1343 - Source to Sea - enabling coherent, efficient and synergistic outcomes, "we must consider the role of Riverwoods in connecting habitats and nature networks for biodiversity, coordinating actions from land to the sea and vice versa. Planning (terrestrial and marine), land-use strategies and the partnerships that drive them, should all recognise the shared relevance of such projects, to also share coherent policies that help address the climate-nature crises through implementation that is place-based but deliberately connected to seemingly distant but relevant environments." Regarding the action to "ensure contaminants of emerging concern that may impact on biodiversity are identified through existing mechanisms with an additional system in place by 2030 that uses Scottish data to identify new problems", a significantly improved and extended system of monitoring of freshwaters is required. Considering source to sea effects, river woodland should be considered priority habitat in mitigating diffuse pollution and climate-induced increases in water temperature putting stress on wild fish populations, as well as other measures such as restoring natural processes in rivers, removing barriers to fish migration, and catchment-scale restoration of water bodies.

On RBMP:

Implementing a programme of measures to restore catchments and rivers through River Basin Management Planning to achieve 81% of water bodies at 'Good' or better condition by 2027 is not sufficient as a key action for achieving river ecosystem restoration and halting biodiversity. This action only echoes current practices to maintain environmental status and avert further environmental degradation rather than ambitious forward-thinking practices of restoration beyond 2027. We would like to see the Scottish Biodiversity Strategy move away from procedural compliance toward achieving specific environmental results, for example completely mitigating the effects of diffuse pollution on water bodies through the incorporation of nature-based solutions such as river woodland planting schemes. The Wild Salmon Strategy highlights that "achievement of RBMP targets may not provide adequate protection for salmon at local and/or national scale and this point is overlooked in the SBS delivery plan. Furthermore, key actions and plans regarding restoring catchments and rivers in order to put Scotland on track to halt biodiversity loss by 2030 must involve a greater coherence between RBMP, RLUPs, nature networks, and funding provided to land managers through replacement agriculture schemes, with significant consideration on how private investment might interact in this space.

On Convening Stakeholders:

With regards to convening stakeholders to implement local and national catchment restoration initiatives, developing best practice through demonstration sites and the provision of expert advice by 2030, we are generally supportive of this action but need more clarity on what this would look like in practice. Demonstration sites at local and catchment scales are already being delivered via the Riverwoods initiative partners and beyond and we encourage the Scottish Government to collaborate closely with Riverwoods to glean best practice and the provision of expert advice.

On INNS:

We need more clarity on the meaning of “priority sites” in the action to eliminate or reduce the impacts of INNS in at least 30% of priority sites by 2030. Scotland’s rivers are often an important route for the spread of INNS and there is a neglect of actions around INNS in freshwater landscapes in the current iteration of the delivery plan. We need to see a commitment to catchment scale invasives management funding long term as well as tools and procedures for effective INNS management being established and required via public funding schemes like AECS and FGS in order to access funding. This should be considered within the new Agriculture Reform Process and added to the SBS Action Plan.

On Deer Density:

We are supportive of setting deer density targets nationally, however, 10 deer per km² nationally by 2030 is not sufficient in allowing for the natural regeneration of woodland. This target should be moved to a maximum of 5 deer per km² nationally and action is required immediately. We would also like to see clarity on what is meant by “priority woodland”. It is essential that prioritisation is given to ancient woodland, areas of connected woodland and woodland in the riparian zone, with deer density targets set at 2 deer per km². Furthermore, regarding support mechanisms, the key actions place emphasis on revising the FGS and enhancing biodiversity outcomes in the highlands, however, the reach of this action should be extended to nationally and ensure coordination across public funding opportunities such as AECS. There are currently no details in the delivery plan of how this low level of deer would be achieved and in order to turn this ambition into action, clear incentives and sanctions need to be identified.

Objective 2: Protect Nature on Land and at Sea across and beyond Protected Areas

On Protected Areas:

While we generally support targets for protected areas, we are concerned that a focus on target based protection may result in parts of Scotland which do not fall within protected areas being neglected. Regarding 30 x 30, we need to ensure that we have clear mechanisms in place for monitoring and ensuring long term that protected areas, both new and existing are adequately protected to a level that halts degradation and biodiversity loss. Designating new areas without appropriate protection activities in place can result in ‘paper parks’. We would like to see more detail in this key action around standards for woodland protection within the 30 x 30 areas.

On Nature Networks:

Local authorities need to be adequately resourced to design meaningful nature networks with tools such as opportunity mapping. Nature networks must also be a coordinated approach alongside RLUPs and the landscape restoration areas. We would like to see the importance of riparian corridors in delivering connectivity and nature networks highlighted within the delivery plan and prioritised in land use decision making support offered to local authorities.

On Biodiversity Metrics:

We strongly support the development of a biodiversity metric or related tool, specifically for use in Scotland. As highlighted above, we believe that river catchments should be central to the delivery of the biodiversity strategy and therefore we wish to support the development of a suite of metrics which strongly support restoration of Scotland’s river catchments and associated land use, including river woodland. To work alongside this, we need a stronger and more ambitious approach to

Biodiversity Net Gain. We do not consider that the Developing with Nature guidance is robust enough to lead to the desired outcomes.

Objective 3: Embed Nature Positive Farming, Fishing and Forestry

On Funding Mechanisms:

Agriculture makes up c.70% of Scotland's land use. We need more clarity on how the SBS will be influenced by the Agriculture bill. In order to achieve restoration targets, we need greater incentivisation mechanisms for land use changes such as the implementation of nature-based solutions such as riparian woodland creation. It is also essential to significantly enhance the integration between various funding and compliance systems. For instance, the Agri-Environment Climate Scheme (AECS) and any future schemes should be contingent upon complete adherence to the regulatory standards set by the Controlled Activities Regulations, including the general binding rules. Furthermore, we need to reduce incompatibilities between funding mechanisms and allow for blending across funding streams, both public and private.

On Protected Natural Woodlands:

We support the statement that "we need to improve the biodiversity benefits from all woodlands", but we would seek assurance that "our most valued and protected natural woodlands" includes native riparian woodland.

On Riparian Buffers:

Whilst we agree that there should be site appropriate riparian buffers identified and developed within non-native commercial forestry, the majority of this opportunity is not being recognised given the lack of legal regulation under the FGS and UKFS.

Given the well-understood role of native riparian woodland in addressing climate-induced warming of freshwaters, incentive is required to encourage riparian areas to be fully identified, planted and maintained appropriately to ensure maximum positive impact within these commercial schemes. This needs to be backed by appropriate funds and legal conditions to ensure establishment under the FGS.

On Diffuse Pollution:

Regarding inputs of nutrients to freshwaters, as mentioned previously, we need to go beyond RBMP and controlling point sources. Delivering nature-based solutions, such as riparian woodland planting, to mitigate diffuse pollution needs to be identified as a key action.

This document was developed by the Riverwoods Advocacy Working Group, made up of representatives from The Scottish Wildlife Trust, Fisheries Management Scotland, Tweed Forum, and The Woodland Trust. This document serves as a set of guiding recommendations but in no way is meant to represent the views of the Riverwoods initiative as a whole.