

**Tackling the Nature Emergency: Consultation on Scotland's Strategic Framework for Biodiversity**

**PART B**

Overview

<i>General Comments</i>

Detailed Response

<b>Specific Comments</b>

<b>Part B – Section Six: Statutory Targets for Nature Restoration</b>	
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<b>6a</b>	<p><b>Placing Targets on a Statutory Footing</b></p> <p><b>Do you agree with this approach to placing targets on a statutory footing? Yes/No/Unsure</b></p> <p><b>Please explain the reasons for your response</b></p>
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Yes.

Scottish Water welcomes the inclusion of a framework for statutory nature targets within the Natural Environment Bill. We would expect this to increase clarity for all parties on what is required to achieve restoration and regeneration.

Statutory nature restoration targets will help to drive appropriate behaviours at a time when local authorities and other public bodies are financially constrained in their ability to deliver anything other than statutory functions.

We would recommend that targets should be cross-sectoral so that initiatives with a carbon mitigation driver that may not otherwise consider biodiversity, such as active travel strategies and energy retrofit, are also required to consider opportunities for biodiversity enhancement.

<b>6b</b>	<b>The Targets Framework</b>
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	<p><b>Do you agree with the criteria set out for the selection of targets? Yes/No/Unsure</b></p> <p><b>Please explain the reasons for your response</b></p>
<p>Yes.</p> <p>Targets should consider synergy with other legislative frameworks and strategies, particularly climate mitigation action and the forthcoming Flood Resilience Strategy for Scotland.</p> <p>Targets should be SMART to give clarity for those tasked with delivery.</p>	
<p><b>6c</b></p>	<p><b>The Form of Targets</b></p> <p><b>We propose Scotland’s statutory targets should include a combination of outcome targets and output targets.</b></p> <p><b>Do you agree statutory targets should include a combination of outcome targets and output targets? Yes/No/Unsure</b></p> <p><b>Please explain the reasons for your response</b></p>
<p>No comment.</p>	
<p><b>6d</b></p>	<p><b>Examples of Potential Target Topics</b></p> <p><b>Is the list of potential target topics sufficiently comprehensive in terms of the focus of proposed target areas and overall scope? Yes/No/Unsure</b></p> <p><b>Please explain the reasons for your response. If you answered “No”, please provide details of any target areas which you think are missing from the list.</b></p>
<p>Unsure.</p> <p>The investment in biodiversity targets should consider both capital and maintenance investment.</p>	
<p><b>6e</b></p>	<p><b>Do you have any other comments on the list of potential target topics? Yes/No</b></p> <p><b>If you answered “Yes”, please provide your comments below.</b></p>



	<p>Yes.</p> <p>The targets should include both absolute numbers as well as % increase over each reporting cycle.</p> <p>Targets specific to urban areas should be considered.</p>
6f	<p><b>Number of Targets</b></p> <p><b>Do you agree with the proposal to have the smallest feasible number of targets which reflects the complexity of nature restoration? Yes/No/Unsure</b></p> <p><b>Please explain the reasons for your response.</b></p>
	<p>Yes.</p> <p>Provided they are the appropriate targets, and they drive the desired behaviour in urban, semi-rural and rural areas.</p>
6g	<p><b>Timescale for Statutory Targets</b></p> <p><b>Do you agree statutory targets should align with the 2030 and 2045 timescales set out in the Strategy? Yes/No/Unsure</b></p> <p><b>Please explain the reasons for your response.</b></p>
	<p>Yes.</p> <p>Collecting target data on a three-yearly cycle is probably appropriate to balance the urgency with the level of effort that will be required in terms of establishing a baseline and gathering data. This cycle will also align with key dates of 2027, 2030 and 2045.</p>
6h	<p><b>Process for Reviewing Statutory Targets</b></p> <p><b>Do you agree the Bill should allow for the review of statutory targets? Yes/No/Unsure</b></p> <p><b>Please explain the reasons for your response.</b></p>
	<p>Yes.</p>



However, a wholesale review of targets that has the impact of resetting the previous data / baselines should be avoided.

<b>6i</b>	<p><b>Process for Reporting on Targets</b></p> <p><b>Do you agree that reporting on targets should align with existing Biodiversity reporting requirements? Yes/No/Unsure</b></p> <p><b>Please explain the reasons for your response.</b></p>
No comment.	
<b>6j</b>	<p><b>Independent Review Body</b></p> <p><b>Do you agree that an Independent Review Body is needed to report on Government's progress in meeting the statutory targets? Yes/No/Unsure</b></p> <p><b>Please explain the reasons for your response.</b></p>
No comment.	
<b>Part B - Section Seven: National Parks</b>	
<b>7a</b>	<p><b>Purpose of National Park Authorities</b></p> <p><b>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/Partially Agree/ Partially Disagree/Don't know.</b></p> <p><b>Please explain the reasons for your response</b></p>
No comment.	
<b>7b</b>	<p><b>Aims of National Parks - First National Park aim.</b></p> <p><b>Do you agree with these suggested changes to the first National Park aim? Agree/Partially Agree/ Partially Disagree/Don't know.</b></p> <p><b>Please explain the reasons for your response</b></p>



No comment.	
<b>7c</b>	<p><b>Second National Park aim.</b></p> <p>Do you agree with the suggested change to the second National Park aim? Agree/Partially Agree/ Partially Disagree/Don't know.</p> <p>Please explain the reasons for your response</p>
No comment.	
<b>7d</b>	<p><b>Third National Park aim.</b></p> <p>Do you agree with the suggested change to the third National Park aim? Agree/Partially Agree/ Partially Disagree/Don't know.</p> <p>Please explain the reasons for your response</p>
No comment.	
<b>7e</b>	<p><b>Fourth National Park aim.</b></p> <p>Do you agree with the suggested change to the fourth National Park aim? Agree/Partially Agree/ Partially Disagree/Don't know.</p> <p>Please explain the reasons for your response</p>
No comment.	
<b>7f</b>	<p><b>The National Park 'principle'</b></p> <p>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. Agree/Partially Agree/ Partially Disagree/Don't know.</p>



	<b>Please explain the reasons for your response</b>
No comment.	
<b>7g</b>	<p><b>Relevance of the National Park aims and the National Park principle to other public bodies operating within National Parks</b></p> <p><b>Do you agree that public bodies operating within the National Park should have regard to the proposed National Park aims? Agree/Partially Agree/ Partially Disagree/Don't know.</b></p> <p><b>Please explain the reasons for your response</b></p>
No comment.	
<b>7h</b>	<p><b>Do you agree that public bodies operating within the National Park should have regard to the National Park principle? Agree/Partially Agree/ Partially Disagree/Don't know.</b></p> <p><b>Please explain the reasons for your response</b></p>
No comment.	
<b>7i</b>	<p><b>Duty on public bodies to support implementation of National Park Plans</b></p> <p><b>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/Partially Agree/ Partially Disagree/Don't know.</b></p> <p><b>Please explain the reasons for your response</b></p>
No comment.	
<b>7j</b>	<p><b>General powers of National Park Authorities</b></p> <p><b>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? Agree/Partially Agree/ Partially Disagree/Don't know.</b></p> <p><b>Please explain the reasons for your response</b></p>



No comment.	
<b>7k</b>	<p><b>Do you think that any other changes should be made to the general powers of National Park authorities? Agree/Partially Agree/ Partially Disagree/Don't know.</b></p> <p><b>Please explain the reasons for your response</b></p>
No comment.	
<b>7l</b>	<p><b>Governance of National Parks</b></p> <p><b>Do you agree with the proposed changes to the governance of National Parks? Agree/Partially Agree/ Partially Disagree/Don't know.</b></p> <p><b>Please explain the reasons for your response</b></p>
No comment.	
<b>7m</b>	<p><b>Do you have any other comments that you would like to make about the aims, powers and governance of National Parks?</b></p>
No comment.	
<b>Part B - Section Eight: Impact Assessments</b>	
<b>8a</b>	<p><b>Human Rights</b></p> <p><b>Do you think that any of the proposals in Part B, will have any adverse impacts on human rights? Yes/No/Unsure</b></p> <p><b>If yes, please provide any comments</b></p>
No comment.	
<b>8b</b>	<p><b>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? Yes/No/Unsure</b></p>



	<b>If yes, please provide any comments.</b>
No comment.	
<b>8c</b>	<p><b>Equalities</b></p> <p><b>Do you think that any of the proposals in Part B, will have any adverse impacts on people with protected characteristics? Yes/No/Unsure</b></p> <p><b>If yes, please provide any comments.</b></p>
No comment.	
<b>8d</b>	<p><b>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? Yes/No/Unsure</b></p> <p><b>If yes, please provide any comments.</b></p>
No comment.	
<b>8e</b>	<p><b>Fairer Scotland Duty</b></p> <p><b>Do you think that any of the proposals in Part B will have any adverse effects on socio-economic equality? Yes/No/Unsure</b></p> <p><b>If yes, please provide any comments.</b></p>
No comment.	
<b>8f</b>	<p><b>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? Yes/No/Unsure</b></p> <p><b>If yes, please provide any comments.</b></p>
No comment.	





<b>8g</b>	<p><b>Island communities</b></p> <p>Do you think that any of the proposals in Part B, will have any adverse impacts on island communities? Yes/No/Unsure</p> <p>If yes, please provide any comments.</p>
No comment.	
<b>8h</b>	<p>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? Yes/No/Unsure</p> <p>If yes, please provide any comments.</p>
No comment.	
<b>8i</b>	<p><b>Child Rights and Wellbeing</b></p> <p>Do you think that any of the proposals in Part B, will have any adverse impacts on child rights and wellbeing? Yes/No/Unsure</p> <p>If yes, please provide any comments.</p>
No comment.	
<b>8j</b>	<p>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? Yes/No/Unsure</p> <p>If yes, please provide any comments.</p>
No comment.	
<b>8k</b>	<p><b>Business</b></p> <p>Do you think that any of the proposals in Part B will have any adverse effects on business? Yes/No/Unsure</p>



	<b>If yes, please provide any comments.</b>
No comment.	
<b>8l</b>	<b>Are there any additional actions or changes to existing actions which can be taken through the proposals in Part B to benefit business? Yes/No/Unsure</b> <b>If yes, please provide any comments.</b>
No comment.	
<b>Environment (Strategic Environmental Assessment)</b>	
<b>8m</b>	<b>What are your views on the accuracy and scope of the environmental baseline set out in the environmental report?</b>
No comment.	
<b>8n</b>	<b>What are your views on the predicted environmental effects as set out in the environmental report?</b>
No comment.	
<b>8o</b>	<b>What are your views on the reasonable alternatives as set out in the environmental report?</b>
No comment.	
<b>8p</b>	<b>What are your views on the proposals for mitigation and monitoring of the environmental effects set out in the environmental report?</b>
No comment.	



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