

# Discussion Paper

## Response Document



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### Developing an Environment Strategy for Scotland

Scottish Government

24<sup>th</sup> August 2018

## Introduction to CIEEM

The Chartered Institute of Ecology and Environmental Management (CIEEM), as the leading membership organisation supporting professional ecologists and environmental managers in the United Kingdom and Ireland, welcomes the opportunity to comment on this consultation.

CIEEM was established in 1991 and has over 5,000 members drawn from local authorities, government agencies, industry, environmental consultancy, teaching/research, and voluntary environmental organisations. The Chartered Institute has led the way in defining and raising the standards of ecological and environmental management practice with regard to biodiversity protection and enhancement. It promotes knowledge sharing through events and publications, skills development through its comprehensive training and development programme and best practice through the dissemination of technical guidance for the profession and related disciplines.

CIEEM is a member of:

- Environmental Policy Forum
- IUCN – The World Conservation Union
- Professional Associations Research Network
- Society for the Environment
- United Nations Decade on Biodiversity 2011-2020 Network

## Comments from CIEEM

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CIEEM welcomes the opportunity to participate in the development of Scotland's Environment Strategy vision and outcomes. We look forward to further participating in the development process for this strategy, along with future consultations, for example on environmental governance and the use of EU principles.

### General Comments

1. Firstly, CIEEM is supportive of the proposals for a new Environment Strategy for Scotland. A healthy environment is fundamental to protect Scotland's biodiversity and achieve sustainable development. It is also positive to see Scotland's natural environment recognised for its intrinsic value in the discussion paper, not only for natural capital, but also in its own right.
2. The stressed importance of focussing on longer-term goals for the environment in addition to short-term challenges is welcome. Environmental issues occur over a long timescale and natural areas often take a long time to restore. Therefore, it is essential any environmental policy for Scotland is developed for the long-term.
3. CIEEM particularly welcomes the ambition to take a "*whole-of government approach*" in the development of the Environment Strategy, as all sectors play a role in maintaining a healthy environment. However, whilst agriculture, fisheries and forestry policies are key players in ensuring the protection of our environment, the Scottish Planning Policy and Land-Use Strategy must also incorporate the goals of the environment strategy. Without the buy-in from all government sectors, the ambitious goals of the strategy will not be realised.
4. CIEEM is pleased to see that the four EU environmental principles – polluter pays, preventative action, tackling pollution at source, and the precautionary principle – will be used to guide the development of the strategy. However, we also advocate the use of two further principles:
  - a) Non-regression Principle
    - i. There must be no rollback of environmental legislation and commitment to international agreements. On principles and standards, there must be no rollback on what Scotland accepts as best practice and minimum standards for the environment.
  - b) Environmental Net Gain Principle
    - i. The environmental net gain principle is currently poorly defined, however, with further development of its definition, it can offer an important means to deliver genuine, evidenced-based environmental equivalence and improvement at appropriate spatial and temporal scales. Defra intends to consult on 'environmental net gain' in the near future, which may offer a clear definition.
    - ii. The environmental net gain principle must also include 'biodiversity net gain' which will include the enhancement of natural capital and ecosystem services, and the restoration of biodiversity. Although the metrics are still to be determined, CIEEM (with the Institute of Environmental Management & Assessment, and the Construction Industry Research and Information Association) has produced principles

on biodiversity net gain for development<sup>1</sup> and will be publishing guidance on delivering biodiversity net gain in the early autumn.

These principles should also be included in development of future consultations on the use of environmental principles and governance in Scotland.

5. Throughout the discussion paper, there is no mention of how these outcomes will be achieved in terms of resources. There will need to be sufficient funding and time directed to achieving the proposed outcomes.
6. There is also no indication in the discussion paper about how Scotland will be reducing consumption levels and changing lifestyles to achieve levels of resource use within one planet's limits. As highlighted in the discussion paper, if everyone lived as people in developed countries like Scotland do, we would need three planets. Reducing this will require a large change in lifestyle.
7. It is positive to see Scottish National Goals linked to the UN Sustainable Development Goals, as it shows an international view of these issues. However, throughout the discussion paper, there is little mention of UK collaboration on environmental goals. To achieve ambitious environmental goals, it is essential that UK devolved nations cooperate and facilitate knowledge and information sharing across countries.

CIEEM would be pleased to provide further information and evidence to Scottish Government on the development of an Environment Strategy as we prepare to leave the EU. CIEEM is committed to working with all stakeholders – including governments – to ensure that the environment is protected and enhanced for the public benefit. We would welcome the opportunity to discuss our position with you further and to explore how we can best work with you to inform this important strategy.

## Discussion paper responses

### **1) What are your views on the following draft vision for Scotland's environment and climate change policies?**

CIEEM supports the aspirational vision for “*one planet prosperity*” and the protection of nature. However, we feel the vision should also mention the reversal of damage to natural ecosystems and biodiversity loss that has already occurred. For example, the vision could be: “*One planet prosperity. This means protecting nature, restoring biodiversity and natural ecosystems, and living within the Earth's sustainable limits, while building a more prosperous, innovative and successful nation.*”

This can be achieved by implementing the ‘net gain’ approach outlined above. As previously mentioned, CIEEM co-published the first UK Principles on Delivering Biodiversity Net Gain in 2016 and is engaged currently (with the same partners) in producing the first industry guidance on how to deliver biodiversity net gain through development. We would be happy to provide further information and support on the development of this principle within the Environment Strategy.

### **2) What are your views on the following draft outcomes that will help to achieve this vision?**

CIEEM supports the ambitious outcomes outlined in the discussion paper, as a high-level strategic direction. However, it should be clarified that outcomes 3 and 4 extend beyond protected areas, as

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<sup>1</sup> <https://www.cieem.net/biodiversity-net-gain-principles-and-guidance-for-uk-construction-and-developments>

they only make up a small portion of the land.

There is no mention of the quality of the landscape at national, regional and local levels but, as outlined in the Value the Environment draft knowledge account, social surveys show that this is important in residents' quality of life and in the economy. Therefore, an outcome could be included which states that *"the Scottish landscape will be of excellent quality at national, regional and local levels."*

The Environment Strategy should also include SMART targets to allow for measurable progress towards these goals. These are specific, measurable, achievable, realistic, time-based goals that can provide milestones for Scotland's environmental achievements.

Environmental goals should be well incorporated into agriculture, planning and forestry policies to deliver a multifunctional approach. Metrics for these outcomes can also be developed using the 'net gain' approach outlined above.

**3) What are your views on the draft knowledge accounts which will be used to help identify priorities for action in the coming years? What additional sources of key evidence can you add?**

Having an accessible summary of the current knowledge/circumstances for these topics is a valuable resource for decision-makers. The 'Key Evidence Gaps' section is particularly useful and should be used to direct quality research and funding to fill these knowledge gaps.

Perhaps a wider base of knowledge is needed to inform the accounts, as there is little reference to primary scientific literature.

Access to Nature draft knowledge account:

- In this knowledge account, the definition of nature is not accurate, as outdoor recreation areas can be barren of diversity. Nature should include plants, animals and natural physical features.

Natural Capital draft knowledge account:

- 'The Third State of Scotland's Greenspace Report, 2018' (references vii and viii) link does not link to the report (also in 'Quality Greenspace Knowledge Account').
- Reference xii (<http://greenspacescotland.org.uk/SharedFiles/Download.aspx?pageid=133&mid=129&fileid=295>) is a broken link.