

CONSULTATION

Response Document



Draft Environment Strategy

29th September 2025

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 8,000 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:

- Scottish Environment Link
- Wildlife and Countryside Link
- Northern Ireland Environment Link
- Wales Environment Link
- Environmental Policy Forum
- IUCN – The World Conservation Union
- Professional Associations Research Network
- Society for the Environment
- United Nations Decade on Biodiversity 2011-2020 Network
- Greener UK
- Irish Forum on Natural Capital (working group member)
- National Biodiversity Forum (Ireland)
- The Environmental Science Association of Ireland

CIEEM has over 860 members in Scotland who are drawn from across the private consultancy sector, NGOs, government and SNCOs, local authorities, academia and industry. They are practising ecologists and environmental managers, many of whom regularly provide input to and advice on land management for the benefit of protected species and biodiversity in general.

This response was coordinated by Members of our [Scotland Policy Group](#).

Vision and outcomes

Notes

Good to see the emphasis on the importance of connecting people with nature, access to nature in urban environments and nature based education.

Question 1: Do you agree with the vision of the Environment Strategy?

Yes, supportive of the emphasis that nature and climate are inextricably interlinked and need to be tackled alongside pollution to deliver wellbeing of people and planet. However, there needs to be clearly defined responsibilities and accountability, monitoring and enforcement mechanisms.

It appears that this strategy has been developed by the Biodiversity team within the Scottish Government Natural Resources Division. For it to really have a transformative impact, the Strategy needs to have input across government teams so that it is properly embedded. While the actions set out in the strategy are welcome in principle, their ultimate value will be limited unless there is clear ownership across the whole of the Scottish Government, ensuring a genuinely joined-up approach. Without this, the strategy risks becoming a restatement of existing policies rather than a mechanism for driving additional progress.

It is therefore essential not only to examine whether the actions identified within the strategy are sufficient to meet the stated goals, but also to consider whether the actions—or in some cases the inaction—of other parts of government may undermine these objectives. A lack of alignment could hinder progress, create barriers to effective delivery, or result in missed opportunities to advance shared outcomes.

Question 2: Are there any outcomes that you feel should be removed, added or changed in the Environment Strategy?

Climate adaptation should be explicitly recognised as a distinct outcome within the strategy, rather than being assumed to be sufficiently addressed under the cross-cutting outcome of “building Scotland’s resilience to climate change.” While closely related, adaptation is a separate dimension of climate resilience and should be given specific attention alongside mitigation and other resilience measures.

Clear recognition of the importance of adaptation, supported by clear actions to enable Scotland to adapt to the impacts of climate change — note, nature and restoration of resilient ecosystems are key — is essential to ensure this critical aspect of climate resilience is fully addressed.

Some of the five direct drivers of global biodiversity loss (changing use of sea and land, direct exploitation of organisms, climate change, pollution, invasive non-native species) and the two indirect drivers (people’s disconnect with nature and lack of value and importance of nature) as identified in the IBPES 2019 report are covered in the vision and outcomes. They are referred to in the Environment Strategy under the global context. However, invasive non-native species are mentioned as one of the key drivers identified in the 2022 Global Biodiversity Framework and yet there is nothing else in the strategy in terms of objectives, policies and deliverables. Notably missing

from the strategy, not even an 'early warning' 'rapid response' approach to arrival of high priority new non-natives that have the potential to become invasive under a changing climate.

Outcome pathways

Question 3: There now follow questions about the individual outcome pathways. Do you think that the outcome pathways considered together include the important policies, actions and future priorities to achieve the Vision? If not, what changes would you suggest?

It is not clear in Table 1 - Draft Priorities for Delivery which are existing strategies and policies. For example,

- Under *Scotland's biodiversity is restored and regenerated* the draft priority for delivery is Strategic Framework for Biodiversity, including the Biodiversity Delivery Plan.

Whereas

- Under *Scotland's society is transformed for the better by living sustainably, in harmony with nature* there is a *Create nature-rich towns and cities* and *Ensure everyone's health and wellbeing benefits from access to a healthy environment*; these fall within a variety of existing policies such as Strategic Framework for Biodiversity and Delivery Plans and NPF4.

In this section making it clearer which will be delivered by existing policies and strategies and which will link across strategies or indeed require development of new policies will be valuable and critical to their delivery. It would also be useful to have clarity on which organisations are accountable/have responsibility for governance of existing plans, policies and strategies. This would be helpful for visibility of available capacity and whether there are too many expectations on one body in particular, or opportunities for synergies/efficiencies.

Having an Environment Strategy presents an opportunity to acknowledge existing strategies and pathways that are not delivering, as evidenced by missed targets, and to recommend that these need to be addressed through, for example, a gap analysis to identify the reasons for ineffectiveness and pinpoint where additional action is needed.

Outcomes on biodiversity, climate change and pollution

Question 4: The pathways for the outcomes on biodiversity, climate change and pollution signpost to existing policies – how can we best address potential synergies and trade-offs across these outcomes? For example, how can we reduce greenhouse gas emissions in a way that also helps to restore biodiversity and minimise pollution?

There needs to be more clarity in how outcomes relate to existing policies, and links to other legislation. An example is the Forestry Strategy. Although it states that 'Scotland planted nearly 75% of all new forests in the UK in 2023.' it does not recognise that Scotland is not delivering on its own targets to increase forest and woodland cover to 21% of the total area by 2032. This includes creating new woodland and restoring native woodlands. Despite these ambitious targets, Scotland has missed its woodland creation targets more often than it has met them, and there are real concerns that the gap between ambition and delivery is widening.

It states a Blue Carbon Action Plan will be published in 2025. It will be important to incorporate how this will relate to marine protections that are already delayed. Protecting carbon-rich seabed habitats that are significant carbon sinks is crucial to deliver on biodiversity and climate goals.

None of the deliverables will be achieved without adequate resourcing for SNCBs such as NatureScot and local authorities and accountable governance, with openness around regulation and enforcement.

Clear, enforceable targets with delivery timelines tied to national and international obligations should be clearly developed with defined responsibilities and roles.

We also need to support and transform pathways into ecology and environmental management careers via increased availability and support of apprenticeships and traineeships and improving diversity, inclusion, and skills to address the interlinked nature and climate challenges.

In the section 3.3.2 on water pollution there should be much greater linkages made between the River Basin Management Plan (RBMP) and the Biodiversity Framework and other associated strategies such as the Land Use Strategy. Considering rivers in isolation means that the pressures cannot be properly assessed and we would advocate for more of a Source to Sea approach. SEPA have a narrow remit with their focus being on the water environment and aquatic life i.e macroinverts, diatoms, fish. If they are not able to broaden this, then it is essential there are mechanisms for linking with the Biodiversity Framework.

There is also no mention of invasive non-native species which is a key determinant in water quality measures. Water bodies play a key role as pathways for the spread of INNS both within and between catchments, including through mechanisms such as water transfers and canal systems.

Although water bodies are not always downgraded in classification solely due to the presence of INNS, they are recognised as Alien Species within the water classification process for River Basin Management Plans (RBMP). Importantly, their presence can result in a downgraded ecological status of “Moderate,” which constitutes a failure to achieve the statutory target of “Good Ecological Status.” Clear acknowledgment of these risks, and the role of water bodies as effective conduits for the spread of INNS, is essential.

Scotland’s global environmental impact is sustainable

Question 5: What are the top priorities the Scottish Government should focus on to improve the environmental impact of Scotland’s activities on other countries? – For example, this could include the impacts of producing the goods and services we import into Scotland, our exports of waste and our approach to international engagement.

One area that should be addressed is that the UK, including Scotland, imports a large percentage of its timber, with 80% of the total UK timber consumption coming from imports¹. Importing timber can also pose risks of potential modern slavery/human rights issues and lax forestry stewardship.

¹ <https://forestrycommission.blog.gov.uk/2025/03/10/celebrating-the-timber-in-our-lives/>

Scotland's forestry sector does not meet the country's total demand, particularly for structural timber and pallet wood. Therefore, as part of the drive towards a circular economy the potential for Scotland to increase timber production to meet current and future demand is required and thereby reduce reliance on imports. This has to be part of a diverse approach of timber production balanced with native woodland restoration whilst being mindful of trees pests and diseases and the changing climate.

Question 6: Do you have any further views on how the pathway outlined in the draft Strategy can help achieve the outcome "Scotland's global environmental impact is sustainable"?

Scotland's society is transformed for the better by living sustainably, in harmony with nature

Question 7: To what extent do you agree/disagree that societal changes, including in our lifestyles and behaviours, are needed to help tackle the nature, climate and pollution crises?

If you agree, please explain in the text box below how you think the Scottish Government could most effectively support and enable these changes in ways that also help to improve people's lives and tackle inequalities.

The climate emergency, biodiversity crisis, pollution, and social well-being are deeply interconnected. These crises cannot be effectively addressed in isolation but must be tackled with holistic, cross-sectoral solutions.

The most salient point of the Dasgupta review² is that "Our economies, livelihoods and well-being all depend on our most precious asset: Nature. Truly sustainable economic growth and development means recognising that our long-term prosperity relies on rebalancing our demand of nature's goods and services with its capacity to supply them. It also means accounting fully for the impact of our interactions with Nature across all levels of society." The findings of the Dasgupta review should be front and centre throughout Scottish Government policies with clear strategies for implementation where demands are often conflicting.

The 20-minute neighbourhood approach underlies Scottish National Outcomes and is a key concept embedded in Scotland's Fourth National Planning Framework (NPF4). Communities where people live close to places of work, food production, education and leisure, and decentralisation of essential utilities are fundamental. The concept of 20-minute neighbourhoods can be used to bring about positive effects for biodiversity in urban settings and in rural areas an emphasis on digital connectivity thereby reducing the need to travel. By improving access to high quality green spaces in urban areas people will be more connected with nature. There needs to be a greater emphasis on the benefits of accessible green space to health and on the role that nature plays in people's wellbeing. To make places more inclusive, diverse, vibrant, resilient and empowering we should

ensure equitable access to greenspace (both in terms of amount and quality), sustainable transport routes and blue-green infrastructure.

Green infrastructure and green spaces will also increase resilience to the effects of climate change and help biodiversity to flourish. Greenspaces should be connected and provide a green 'highway' to all areas of the town or city.

Although pilots of 20-minute neighbourhoods are being conducted in larger cities in Scotland the delivery which depends on integrated planning and collaborative community engagement is not really happening. Climate and nature were key in NPF4 yet the housing emergency is currently taking precedent and biodiversity enhancement is not being delivered on the ground.

Or, if you disagree, please explain in the text box below why you don't think that societal changes, including in our lifestyles and behaviours, are needed to help tackle the nature, climate and pollution crises.

Question 8: Do you have any further views on how the pathway outlined in the draft Strategy can help achieve the outcome "Scotland's society is transformed for the better by living sustainably, in harmony with nature"?

Scotland's net zero, nature positive and circular economy thrives within the planet's sustainable limits

Question 9: To what extent do you agree/disagree that a just transition to a net zero, nature positive, circular economy is needed to support Scotland's role in tackling the nature, climate and pollution crises?

If you agree, please explain in the text box below how you think the Scottish Government could most effectively support this transition in ways that create wider economic opportunities for Scotland, including for jobs and businesses.

Or, if you disagree, please explain in the text box below why you don't think a just transition to a net zero, nature positive, circular economy is needed to support Scotland's role in tackling the nature, climate and pollution crises.

Agree, and it needs to be consistently incorporated in policies and legislation.

Question 10: Do you have any further views on how the pathway outlined in the draft Strategy can help achieve the outcome "Scotland's net zero, nature positive and circular economy thrives within the planet's sustainable limits"?

There is a disconnect between policies and delivery on the ground.

We build Scotland's resilience to climate change and other global environmental risks

Question 11: Do you agree/disagree with the approach set out in the pathway for the outcome “We build Scotland’s resilience to climate change and other global environmental risks”?

These transformations are achieved through a just transition and support climate and environmental justice

Question 12: Do you agree/disagree with the approach set out in the pathway for the outcome “These transformations are achieved through a just transition and support climate and environmental justice”?

Questions on the Impact Assessments

Question 13: Do you have any views on whether there are likely to be any positive or negative environmental impacts from the draft Environment Strategy that have not been identified in the Strategic Environmental Assessment (SEA)?

Question 14: Is there anything in the draft Environment Strategy which should be added or changed to strengthen positive impacts or lessen any negative impacts on people with protected characteristics?

Question 15: Are there any positive or negative impacts on protected groups (age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation) that have not been identified in the draft Equalities Impact Assessment?

Question 16: Are there any other protected groups, which have not been identified in the draft Equalities Impact Assessment, that will potentially be positively or negatively impacted by the Environment Strategy?

Question 17: Are there any positive or negative impacts on island communities that are different from the impacts on mainland areas from the draft Environment Strategy, that have not been identified in the draft Islands Communities Impact Assessment?

Question 18: Are there any positive or negative impacts on groups experiencing socio-economic disadvantage (such as income, low wealth or area deprivation) from the draft Environment Strategy that have not been identified in the draft Fairer Scotland Duty?

Question 19: Are there any positive or negative impacts from the draft Environment Strategy that have not been identified in the draft Child Rights and Wellbeing Impact Assessment?

Question 20: Are there any positive or negative impacts from the draft Environment Strategy that have not been identified in the draft Consumer Duty Impact Assessment?

Question 21: Are there any positive or negative impacts from the draft Environment Strategy on businesses that have not been identified in the partial BRIA?

Question 22: Do you have any further views on the partial BRIA?

Question 23: Are there any other positive or negative impacts on areas such as health in the draft Environment Strategy that should be considered?