## **ENGAGEMENT PAPER**

## Response Document



# Landscape scale nature restoration in Scotland - engagement paper

19th November 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 9,000 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
- Society for the Environment
- United Nations Decade of Restoration 2021-2030 Network
- Irish Forum on Natural Capital (working group member)
- National Biodiversity Forum (Ireland)
- The Environmental Science Association of Ireland

CIEEM has over 880 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 <u>Scotland Policy Group</u> with input from the wider CIEEM membership.

## Question 1: Do you agree that the projects listed in annex 1 are the right projects to select as exemplars? If not, why not?

Nature restoration at landscape-scale is crucial for meeting Scotland's nature-emergency commitments.

These projects have merit as potential exemplars, but we have concerns about the process for selecting these projects which we detail in answer to this and question 2 below. The projects in annex 1 encompass a diverse range of landscape-scale initiatives and projects across Scotland, including terrestrial and aquatic habitats in rural (including farmland) urban, and peri-urban areas. These projects are already established, have sound governance, and aim to implement and deliver innovative ideas. We would like to know how the six exemplars will be chosen given that they are quite different; for example, will one be chosen from each different landscape type, habitat, location etc.?

The paper places emphasis on the importance of collaboration across multiple stakeholders, and 'Strong local community and stakeholder engagement as well as Land owner buy-in' is among the success criteria. However, as outlined above, the projects listed are already wellestablished and agency-led; we therefore have questions about what opportunities these projects offer for further partnership and collaboration, and what additional benefit these can deliver? There are many existing examples of successful partnership working: the Dee Catchment in Aberdeenshire is already a focus catchment with restoration work carried out and coordinated by the Dee Catchment Partnership, the River Dee Trust, Glen Tanar and the other estates and in the upper reaches of the catchment at Mar Lodge, National Trust for Scotland plus numerous other partners and projects. Likewise, the tributaries of the Dee such as the Tarland Catchment have long been a focus of restoration projects. There has also been extensive research and monitoring studies to date carried out by the James Hutton Institute and others. The River Dee Trust coordinates the One Million Trees project<sup>1</sup> which was launched in 2020 and is geared towards providing 50% woodland cover along the riverbanks. Therefore, working alongside the River Dee Trust, one of the new things that is stated is that the project will address 'Landscape scale deer management'. This would have obvious benefits to the One Million Trees project but will need to be carried out with all the estates.

We want to understand what additional benefit will come from making these projects exemplars, and how they will support existing partnerships and projects in collaboration. For example, we can see how the agencies could take on a co-ordination, strategic and funding role. But, although the paper states that, 'All of these things require collaboration across land holdings, between agencies, with communities and with businesses to be

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<sup>&</sup>lt;sup>1</sup> https://riverdee.org.uk/one-million-trees/

successful. We believe that working together at landscape scale is key to achieving the multiple benefits that nature restoration can bring', it is not clear how this will happen in reality. This gap therefore feels like a missed opportunity which limits the ambition of the proposals.

Question 2: Do you have other suggestions for exemplar projects? If so, where are they and why do you think they are important? What lessons can we learn from them? We have encouraged CIEEM members to submit potential exemplar projects to landscapescalerestoration@nature.scot.

The exemplar projects offer an opportunity to try different approaches and strategies which won't always all be successful but that is part of the process. A key opportunity is investigating the role of private and blended finance. The Financing Natural Flood Management (NFM) for Communities and Wildlife of the Eddleston Water project<sup>2</sup> has shown some of the challenges and opportunities. For example, it found that meaningful revenues from private sources are unlikely to be realised unless flooding is seen to be threatening the resilience of large businesses/highly populated areas located within flood-prone areas. It also showed that investors had limited interest in NFM projects, unless they were of sufficient scale and with assured long-term land ownership to underpin financial returns.

As outlined under question one, we consider that restoration projects have been successful because of partnership working across agencies, NGOs, LAs, landowners, community groups etc. At present, the process of prioritisation of these exemplars has been driven by agencies; questions will therefore be asked about what evidence-based selection criteria have been used amid concerns that the process has been top-down, which may affect buy-in from other potential partners.

Question 3: Do you agree that the Areas of Focus we have identified in annex 2 are the right places for agencies to focus our efforts? If not, please provide evidence to support changes to the priorities identified.

The structure for identifying Areas of Focus has been guided by existing and potential agency involvement rather than ecological decision making. This approach potentially narrows rather than expands ambition for transformational restoration at scale and risks distorting how resources are allocated. There is concern that funding will be harder to access for community and NGO delivered projects.

<sup>&</sup>lt;sup>2</sup> <a href="https://tweedforum.org/our-work/projects/investing-in-nature-in-the-eddleston-water-catchment/">https://tweedforum.org/our-work/projects/investing-in-nature-in-the-eddleston-water-catchment/</a>

The projects listed are all existing projects of varying sizes. The ambition laid out in the Scottish Biodiversity Strategy requires new, strategic landscape-scale projects, and the linking of projects together across landscapes. Such innovative approaches could perhaps emerge from the Community of Practice.

## Question 4 What more can be done to accelerate and scale up nature restoration at landscape scale?

From the engagement paper it is not clear whether the process of identifying exemplars will be rolling, or whether the six projects selected at this stage are fixed. If the former, we would like to see more information on how this process will take place and with what frequency.

It is encouraging to hear that a community of practice will be created next year to share experience between projects. This will help raise awareness of the overall process, identify pitfalls, expected timelines etc. as well as being a forum where new projects can benefit from the experience of others that have been through the process.

Public grants can be hard to apply for, requiring time, expertise, and coordination. Applications are not always successful, highlighting the need to simplify the process, provide guidance for better outcomes, and opportunities for feedback (e.g. NRF's expression of interest stage). 'Long-term financing and resources' is a key success factor, which we agree is more important than short-term funding. However, the funding cycle described in the paper does not clearly ensure long-term funding or restoration continuity. CIEEM members have raised concerns about how to factor in monitoring with the Nature Restoration Fund; as the proposals in this paper develop, we would like to see this issue be considered and would be happy to support.

It is positive to see cross-agency working as this will likely result in multiple benefits across many policy areas and deliverables. However, see concerns highlighted under question one.

We are keen to see how these exemplars could help to answer practical questions on enabling landscape-scale restoration, for example:

- Do we need to focus incentives in those areas?
- Do perverse incentives arise which need to be addressed?
- Are there other barriers to restoration that can be removed? Are there ways in which we can stimulate landscape-scale restoration rather than piecemeal efforts?

Another concern we have with what is proposed is that landscape-scale INNS projects and species conservation projects are being prioritised through different processes. We appreciate that a dedicated Scottish INNS Plan is in development, but INNS control is integral to many, if not most, landscape-scale restoration projects and can't be treated as separate in this manner. Indeed, this very paper states that - landscape-scale restoration is

about reducing the pressures on nature which contribute to the current crisis (such as managing grazing, tackling invasive non natives; and addressing habitat fragmentation through the creation of nature networks) and creating healthy ecosystems alongside food production, other forms of land use and human activity. The candidate exemplar - Arkaig Landscape Restoration Project (Beo Airceig) actually lists INNS control as a new deliverable this project demonstrates and in the Flow Country removal of Sitka spruce seedlings and saplings is being undertaken as part of restoration efforts and requires ongoing management. Clarity is needed on how INNS control as part of large-scale restoration will be delivered as part of these exemplar projects.