

Written submission from RSPB Scotland

Summary

RSPB Scotland offers comments on the Environment, Climate Change and Land Reform Portfolio on the Scottish Government's Draft Budget 2016-17 in advance of ECCLR Committee considerations.

We recognise the budgetary constraints within which the Scottish Government operates and acknowledge that difficult choices have to be made. We are very disappointed however to see significant year-on-year cuts to the budgets of those agencies charged with helping meet environmental targets and commitments. Whatever the outcome of "Brexit" discussions maintaining and preferably enhancing our environmental legislation in order to conserve our natural environment, our iconic species and globally important habitats should remain a top priority with adequate budget commitments to match.

Introduction

The importance of our natural environment cannot be taken for granted. It is our life support system, providing us with unpolluted air to breath, clean water to drink, nutrient rich soils to grow our food and trees to seek shelter under on rainy days. Intrinsically, we are intrigued, inspired and moved by our natural environment. As if this wasn't enough, we gain cultural, health and economic benefits as well. Anxiety can be alleviated by a walk through a biodiversity abundant park; our awe-inspiring landscapes are the foundation of numerous recreation, eco-tourism and similar 'green-collar' jobs and industries, whilst the wealth of Scottish literature is a testament to both our greatest cultural figures and the natural phenomenon that inspired them.

In recent years, the Scottish Government has made a range of environmental commitments and set ambitious targets to, for example, halt the loss of biodiversity, reduce greenhouse gas emissions, improve water quality and reduce the risk of flooding. It has been a reassurance to hear the Scottish Government reiterate some these commitments during these times of potential uncertainty, yet we maintain that whatever the outcome, maintaining and preferably enhancing our environmental legislation in order to conserve our natural environment, our iconic species and globally important habitats should remain a top priority with adequate budget commitments to match. A failure to invest in our natural environment will result in the significant and noticeable loss of benefits and in many cases increase future costs to mitigate what could have been preventable.

RSPB Scotland recognises the budgetary constraints and current political uncertainty make it difficult to guarantee existing functions and priorities, yet we maintain that any continued budget cuts would present the Scottish Government with some stark, difficult choices in maintaining its global leadership on climate change and safeguarding its biodiversity and natural environment. Investing in the natural environment is, by its nature, preventative spend, and failing to protect our environment puts the public benefits it offers at risk, hampers Scotland's commitment to meeting 2020 biodiversity targets, and jeopardises Scotland's reputation as a country which values its iconic natural environment.

Common Agricultural Policy

Scotland currently receives substantial amounts of funding for environmental initiatives from the EU. These include significant sums through Pillar II of the Common Agricultural Policy (CAP) for the Scottish Rural Development Programme (SRDP), which includes the Agri-Environment-Climate Schemes. The prospect of leaving the EU and with it the funding from CAP, gives rise to a great deal of uncertainty for the future of Scotland's rural areas. As well as questions over the longer term funding arrangements, the availability of funding in the short term is of particular concern for rural land management.

Ensuring that schemes under SRDP and the Agri-Environment-Climate Scheme in particular, remain open for business in 2017, 2018 and 2019 is essential. The latter scheme is necessary to secure management for some of Scotland's most important wildlife and habitats, particularly the appropriate management of designated sites and to enable the Government to meet its water quality and climate change targets. The SRDP also funds forestry grants, the Environmental Co-operation Action Fund and the Less Favoured Area Support Scheme which provides essential support for rural areas. The budget for this scheme, which must also contribute to meeting water quality targets under the Water Framework Directive and climate change targets as well as those for biodiversity, is underfunded at £48 million per annum.

Scotland has been a leader in demonstrating how land management support payments, to marginal areas in particular can, if managed and targeted properly, deliver huge benefits to both wildlife and agricultural communities. The collective effort of conservationists, farmers, crofters and government to reverse catastrophic declines in the Scottish corncrake stand testament to this. Progressive social and environmental gains such as this are now in jeopardy.

What will replace EU Funding?

Whilst there has been an ongoing and welcome emphasis on 'enjoying' the natural environment, its work on enhancement and conservation has, to date, not delivered sufficient outcomes. Scotland received EU funding to deliver environment initiatives, such as the aforementioned CAP and SRDP, but other funding measures include the LIFE+ and LEADER Programmes and Green Infrastructure Strategic Intervention. At present, the Scottish Government is predominately dependent on LIFE+ funding for its scheme or partner scheme in order to deliver its 'Six Big Steps for Nature' as outlined in *Scotland's biodiversity: a Route Map to 2020*. Without it, it is unlikely that many of these projects will be delivered – and, thus, it becomes unlikely that the Scottish Government will meet its international commitments to biodiversity conservation. The question is whether the Scottish Government is now willing to adequately fill the gap to achieve its goals.

The latest State of Nature Report (2016) objectively shows that Scotland's biodiversity recovery is flat-lining. The same trend is being observed for protected areas; in 2015 the sites in favourable condition was 78.8%, in 2009 it was 78.4%. Concerted action and investment is needed now if we are to meet the renewed 2020 biodiversity targets, giving recognition from the top that Scottish biodiversity provides essential public goods and has intrinsic value. In regards to Scotland's ambitions of staying within the EU, the importance of our protected areas and Natura 2000 sites

are paramount and there is clear evidence to show they work to protect nature. The ecosystem services provided by the Natura 2000 network have been well documented; provisioning (eg. food, fibre, fuel, medicines), regulating (eg. water regulation and purification, erosion control, pollination, genetic diversity) supporting (eg. nutrient cycling, water cycling, production) and cultural (eg. recreation, education, research) services are valued at €211.5 million per year in Scotland¹.

Regarding budgetary decisions, as the table below demonstrates, it is concerning to see the steady dependency on SRDP money to deliver SNH outcomes. As aforementioned, there are already concerns regarding the future of the SRDP schemes and how under-resourced they already are, to then add additional funding pressure from government agencies should ring alarm bells as to how Scotland's environment will be financially safeguarded.

Breakdown of spend between 2008 and 2015 on protected areas to Maintain and Improve Natural Feature Condition

Year of expenditure	Total spend on all SNH Management Agreements (including ongoing management support) £	SRDP spend (951 cases) £
2008/2009	5,080,171	3,135
2009/2010	4,918,697	5,007,512
2010/2011	4,857,595	7,612,509
2011/2012	3,304,026	7,821,724
2012/2013	3,429,794	8,108,605
2013/2014	2,790,126	8,159,237
2014/2015	2,558,279	7,737,453

Scottish Natural Heritage

Continued cuts to SNH will likely compromise SNH's ability to help the Government meet 2020 targets to halt the loss of biodiversity, deliver peatland restoration and ensure that substantive progress is being made to improve the condition of designated sites on land and at sea. At a time of increased need for active ecological restoration and conservation of our unique natural assets, we are seeing declines in local delivery mechanisms such as local biodiversity officers, movement away from active management – either directly by SNH or through grants or through funding to other bodies, for our National Nature Reserves, and a drop in ambition to tackle key

¹ Institute for European Environmental Policy (2008). Costs and social benefits associated with the Natura 2000 Network. http://ec.europa.eu/environment/nature/natura2000/financing/docs/natura2000_costs_benefits.pdf

issues facing biodiversity. The recent decision by SNH to withdraw a proposal for a LIFE bid to fund work on Uist hedgehogs demonstrates a clear miss-match between national legislation, policy and ambition regarding invasive species as a key driver of biodiversity loss – in which Scotland is a European exemplar - and the capacity that our national environmental agencies have to actually deliver in reality against these aspirations. Moreover, continued budget cuts raise concern regarding SNH's capacity and ability to scrutinise planning applications adequately.

Funding should also be allocated to areas of most importance or restoration need rather than focusing priorities around population hubs. Where we have seen conservation success is when SNH have actively engaged with the land management community to deliver land management plans of designated sites in a supportive and advisory role. A successful example of this engagement is Scottish Environment Protection Agency (SEPA)'s work with the Water Catchment Plans under the Water Framework Directive. Whilst costly, this engagement has proven effective, although threats of reduced or cut funding loom equally large.

Equally worryingly, cuts to the Scottish Natural Heritage (SNH) grant programmes which help develop and delivery projects that contribute to the Biodiversity Strategy targets and 2020 Aichi targets show no sign of abating, such as the Peatland Action fund. Conservation bodies are finding it increasingly difficult to secure SNH support for core conservation work – for example, advisory work that allows rural communities to access SRDP funding for management to benefit biodiversity such as butterflies, bumblebees and farmland birds.

SNH cuts are, often, disproportionately applied to the grants schemes and this has wider ramifications. The environment and its conservation heavily rely on science-based expertise and experience. Budget cuts not only pose a risk to the environment due to lack of funds, but also due to the loss of experience base represented by the people and their long-standing skills. The same can be said for the duration of grants and funding which is typically either short term or restrictive. Short term funding makes it difficult to retain expertise, pay for monitoring to demonstrate success or to pay for long-term sustainable management which in the majority of the cases is how nature conservation succeeds.

Year of expenditure	SNH Total budget £	Grants made to the public sector £	Grants to the private sector £
2011/2012	60.7m	0.780m	7.223m
2012/2013	57.8m	1.916m	4.959m
2013/2014	55.3m	2.006m	5.133m
2014/2015	53.1m	3.609m	5.904m
2015/2016	53.1m	1.614m	5.992m

Marine Scotland

Marine Scotland is responsible for the integrated management of Scotland's seas and is tasked with the delivery of Scotland's pioneering marine legislation, which together with several international agreements aim to improve stewardship of marine resources and achieve a healthy and productive marine environment.

Since the introduction of Scotland's Marine Act in 2010 there have been several areas of welcome progress. Projects to develop a network of marine protected areas and the introduction of Scotland's first national marine plan are two prominent examples, though there have been significant delays in both cases and full implementation is incomplete.

It is highly concerning that Marine Scotland's budget has faced year on year reductions at a time when significant investment has been required to realise the Scotland's vision of *'clean, healthy, safe, productive, biologically diverse marine and coastal environments, managed to meet the long-term needs of people and nature'* as articulated by the national marine plan. Of particular note is that without adequate financial support for marine science and monitoring of the type that that is needed to inform robust decision making in the marine environment, Scotland's fledgling marine planning system will be ineffective, and the legal requirement of 'good environmental status' under the Marine Strategy Framework Directive will be unachievable.

Additionally Marine Scotland may also be faced with the considerable task of developing and implementing a new legislative framework for fisheries outside the Common Fisheries Policy. This may lead to a significant shift in priorities for the directorate in the run up to an exit from the EU and as a consequence other functions are squeezed even further.

Conclusion and Proposed Questions

Self-reflection, though difficult is necessary and now is the time for the Scottish Government to ask itself some challenging questions. Below are some questions that the Committee may wish to ask:

- Through its actions, is the Government delivering the vision and ambition for the natural environment?
- What sort of natural environment are we trying to protect and enhance for future generations?
- What is happening with the Biodiversity Strategy?
- In order to achieve its outcomes, what mix of advisory on the ground conservation regulations is appropriate; and is each of those appropriately funded?
- Not only should the Committee clarify how much budget the Government is planning to allocate but what they plan to do with it and where their own priorities lay. Do these align with the Committee's own vision?
- What are the potential impacts on 'non-environmental' spend on environment – e.g. roads, energy, agricultural subsidies, etc?
- Are other portfolios pursuing priorities or spend that exacerbate environmental challenges?

Actions speak louder than words and it is now the time for the Scottish Government to demonstrate this. RSPB Scotland would strongly encourage you to ask the Scottish Government to use the forthcoming budget process to make a clear statement that the SRDP and its constituent schemes remain open to applications between now and when (or if) the UK leaves the EU and that the Scottish Government will provide the necessary match funding for the gap left behind by the removal of such scheme as LEADER and LIFE+.