

Fwd: Biodiversity strategy

Pete Ritchie <pete@nourishscotland.org.uk>

Mon 10/10/2022 20:57

To: Anna Chworow <Anna@nourishscotland.org.uk>

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From: Daniel.Hall@gov.scot <Daniel.Hall@gov.scot>

Sent: Tuesday, September 20, 2022 2:31 pm

To: Pete Ritchie

Subject: RE: Biodiversity strategy

Dear Pete,

Thank you for the response to the consultation. While we are on a tight timescale for the consultation process, we endeavour to accept responses after the closing date where possible, and I can confirm we received yours in time for inclusion in the consultation analysis process.

Regards,

Daniel

[Daniel Hall](#)

[Policy Officer](#)

[Natural Resources Division | Directorate for Environment and Forestry](#)

[The Scottish Government | 3G South, Victoria Quay | Edinburgh EH6 6QQ | T: 0131 244 4440](#)

From: Pete Ritchie <pete@nourishscotland.org.uk>

Sent: 14 September 2022 13:10

To: Biodiversity <Biodiversity@gov.scot>

Cc: Kerr J (John) <John.Kerr@gov.scot>

Subject: Biodiversity strategy

Dear colleague

Apologies for the late response.

Nourish Scotland welcomes this consultation.

The illustrative maps of lowland and upland landscapes with possible actions for nature are very helpful, it would have been good to have had the same for marine and urban.

We're pleased to see the stronger focus on mixed and native woodland rather than monocrop plantations. We welcome the references to agroforestry and soil-sealing.

It's good that you mention responsible private investment. We welcome the proposal that: "Ministerial leadership of a high-level strategic forum will facilitate agreement around priorities, the content of delivery plans and troubleshoot issues" This does need to bring ARE and ENFOR together; and could usefully include a private investor representative to provide line of sight into that constituency (which is keen to engage at Ministerial level).

Here is our response specifically to the questions relating to the rural environment

- **Do the 2045 outcome statements adequately capture the change we need to see?**

No. They describe relatively modest aspirations and are not quantified.

Also, the biggest thing which is missing is our extraterritorial impacts. While we damage nature in Scotland through current management practices we also damage nature in the places from which we import goods, in particular food and feeds (soya and palm oil which are not certified, wild fish to feed farmed fish etc)

- **Are the 2030 milestones ambitious enough? Are we missing any key elements?**

They are broadly helpful, but they are not milestones in the sense they have no numbers on them. You are missing nitrogen and pesticides. As you know, the post-2020 Global Biodiversity Framework calls for **Reduce nutrients lost to the environment by at least half, and pesticides by at least two thirds, and eliminating discharge of plastic waste**. The EU's Farm to Fork policy has similar targets. Given that Scotland has a statutory nitrogen balance sheet and is also seen as a leading actor at COP-15 through the Edinburgh process, nitrogen and pesticide reduction should be a key element in the 2030 milestones

- **What are the key drivers of biodiversity loss in this outcome area?**

Too much nitrogen and pesticides (see above). Too few trees and hedges in fields. Large fields. Overstocking. Only sowing ryegrass rather than mixed leys. Too few weeds. In uplands, deer and grouse.

- **What are the key opportunities for this outcome area?**

There's an opportunity to transform our approach to farming so we genuinely farm with nature and see the role of farmers, crofters and growers as stewards and curators of a nature-rich and beautiful landscape.

But it needs leadership from Government and a wholesale reform of post-CAP farm support.

In particular it needs a science-based approach. On the current post-CAP model, the key threshold is between Tier 1 and Tier 2. What do farmers need to do to be green enough to qualify for the additional payment?

This question should be based on what we need to do collectively to meet our climate and nature targets – so for example, all farms should have healthy peat soils or be actively restoring their peatland to qualify. All farms should be using no more nitrogen than they need for the crop to qualify. All farms should be using say half the current average level of pesticide per hectare to qualify. Happy to discuss more.

- **What are the key challenges for this outcome area?**

All the other things Government is trying to do. Boldness and leadership. Following the science. Events

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