



Tackling the Nature Emergency

A Scottish Government Consultation

Edinburgh Communities Climate Action Network's Response

Date: 12/12/2023

On the 7th September 2023, the Scottish Government launched a public [consultation titled *Tackling the Nature Emergency*](#), which summarises their overarching framework for action to combat the Biodiversity Crisis. In our capacity as a community-led, climate action network, the Edinburgh Communities Climate Action Network (ECCAN) has formulated a coordinated response that outlines our assessment of the proposed actions.

The consultation is centred around the *Scottish Biodiversity Strategy*, proposed in December 2022. The strategy was framed around six, high-level objectives:

- Accelerate restoration and regeneration;
- Protect nature on land and at sea, across and beyond protected areas
- Embed nature positive farming, fishing and forestry
- Protect and support the recovery of vulnerable and important species and habitats;
- Invest in nature; and,
- Take action on the indirect drivers of biodiversity loss.

Of these objectives, we have elected to focus our response to the final two objectives: '**invest in nature**' and '**take action on the indirect drivers of biodiversity loss**'. ECCAN is based in the City of Edinburgh and works to support climate action in a metropolitan area; the final two objectives were the most closely interlinked with our expertise.

Our response is drawn from the views of our members. On the [13th November 2023](#), we ran a workshop with 16 participants from across our network to facilitate critical discussion of the chosen objectives. The collective responses below have been formulated from analysis of comments made at the workshop, following ECCAN's objective: to enable a joined up approach to reducing environmental harms and tackling climate change at a regional level.

Objective 5 – Invest in Nature:

Objective 5 outlined a plan to increase investment to meet the pace and scale of the new biodiversity targets. The plan outlined increases in public investment as well as opportunities to stimulate private investment. The key actions were:

1. Develop a Biodiversity Investment Plan.
 2. Establish a values-led, high-integrity market responsible for private investment in natural capital.
 3. Explore options for attracting private finance to support the restoration of Scotland's iconic Rainforest.
 4. Increase investment in Scotland's Marine Environmental Enhancement Fund.
 5. Provide direction and investment in, green skills and local economic opportunities supporting nature-based education, nature restoration skills and volunteering.
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Question:

Have we captured the key actions needed to deliver the objective: Invest in Nature?

ECCAN's Response: No

The actions outlined do not meet the objective and are not an adequate response to the biodiversity crisis. We were concerned by the reliance on private investment, particularly the inclusion of a credits system. This will give corporations the opportunity to offset negative environmental impact instead of preventing that impact at source; it is government sanctioned greenwashing. There is no clarity as to how the values of investors will be held to account and the plan makes no reference to land reform. Scotland already has huge inequalities in landownership and the commodification of Scottish natural resources, through a biodiversity credit system, risks widening this gap further. ECCAN strives to empower communities to enact positive environmental change; we cannot condone such a top-down investment strategy. To meet the objective, this plan needs to focus less on attracting private investment and more on using existing funds to restore the natural environment and help communities.

Question:

Which actions do you think will have the most impact?

ECCAN's Response:

We feel that the first action, developing a Biodiversity Investment Plan, could have a significant impact. However, the final action, investing in education and local action, is the most important for ensuring a just transition. Despite its importance, this action is not integrated with the rest of the plan, coming across as an afterthought, and does not offer a clear plan of action. For example, it is unclear how the 'nature-based education' referenced will be taught and whether funding will support existing grassroots groups that are working to safeguard biodiversity. Finally, we think that the second action, as currently described, would have the least positive impact and could potentially be detrimental to communities and the Scottish environment due to the inclusion of biodiversity credits.

Objective 6 - Take Action on the Indirect Drivers of Biodiversity Loss:

Objective 6 focused on tackling the indirect drivers of biodiversity loss, which stem from people's disconnect with nature and the consequent lack of recognition for the value and importance of nature. These drivers are made manifest in unsustainable production and consumption patterns. The key actions to target indirect drivers were:

1. Engage and strengthen the connection between people and communities and nature.
 2. Embed biodiversity and nature in curriculum development.
 3. Mainstream and integrate biodiversity policy across government.
 4. Address unsustainable supply and demand to reduce biodiversity impacts.
 5. Make Space for Nature
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Question:

Have we captured the key actions needed to deliver the objective: Take Action on the Indirect Drivers of Biodiversity Loss?

ECCAN's Response: Unsure

ECCAN supports the actions outlined in principle, however, they require a more direct and specific approach. The Government must provide a legal framework which ensures action is taken rather than simply encouraging change. We agree that education should be a key focus; building awareness and understanding of environmental issues is central to our work at ECCAN and our vision for a regenerative Edinburgh. Yet this plan does not offer clarity on how a new curriculum would be developed and who it would be taught too. Moreover, the plan should acknowledge that environmental impact is not equal across all people and should directly target polluters who profit by perpetuating unsustainable consumption. For example, known contributors to biodiversity loss should face sanctions for their unsustainable actions. In sum, this plan lacks direct and targeted action. Without this, we cannot give it our full support.

Question:

Which actions do you think will have the most impact?

ECCAN's Response:

We feel that the first action is the strongest in general. Supporting connections between communities and nature is central to our mission as a community action network. We wholeheartedly believe that engaging people with nature will create a resilient society and a biodiversity-rich environment. However, the first action, along with all the other actions outlined, is far too vague to ensure meaningful impact. Until the Government outlines a specific plan with a transparent, comprehensible path to these outcomes, we do not feel confident that any of these intentions will be realised. These actions are just words; we want to see a full plan for how a circular economy and mainstream environmental education could be implemented at a local and national level.
