



ADAPTING TO THE CHANGING CLIMATE: CONSULTATION ON THE ENVIRONMENTAL IMPACTS OF ADAPTATION

RSPB Scotland response to the Scottish Government

RSPB Scotland¹ is part of the RSPB, which speaks out for birds and wildlife, tackling the problems that threaten our environment and promotes the conservation of wild birds and their habitats. We are supported by 88,000 members in Scotland, with a strong membership base in rural areas as well as towns and cities. We have practical experience of managing land for conservation, farming, forestry and other enterprises, and of providing advice to land managers. RSPB Scotland manages 68,240 hectares of land, much in management agreements with local farmers/ crofters and graziers. Our land management interests cover a wide range of habitats and geographic areas within Scotland. We undertake biological and economic research to underpin our policy analysis and advocacy.

As well as commenting on national planning issues, our professional planning and conservation staff are regularly involved in the development planning process and we comment on several hundred planning applications, annually. We also have experience of environmental education and training for all ages. In combination with RSPB staff across the UK, and our international partners in Birdlife International, we have cross-cutting expertise and experience of land use and sustainability issues within Scotland, the UK and internationally.

Introduction

RSPB Scotland welcomes the opportunity to respond to this consultation on the environmental impacts of adaptation. In addition to this response we have contributed and signed up to the response from Scottish Environment LINK (LINK) and fully endorse the comments within their document. LINK's response provides detailed comments on the majority of the Draft Action Plans (APs) within the document and the Environmental Assessment. We have therefore, purposefully kept the following comments brief.

RSPB Scotland believes that Scotland has a responsibility to help biodiversity and the natural environment adapt to climate change. We also believe that as all sectors of the Scottish economy and society adapt to climate change they must do so in a sustainable way, including helping biodiversity and the natural environment to adapt. Furthermore, we believe that if we conserve nature it will help society to adapt in sustainable ways through the provision of ecosystem services².

¹ The Royal Society for the Protection of Birds (RSPB) is a registered charity: England and Wales no. 207076, Scotland no. SC037654

² RSPB Scotland, Helping Nature to Help Us: Scotland's biodiversity and the challenge of climate change. http://www.rspb.org.uk/Images/Final%20Final%20Scottish%20Climate%20A4%20booklet_tcm9-184696.pdf



RSPB Scotland recognises 5 key principles for helping the natural environment adapt to climate, set out in a report by Defra³:

1. Make wildlife resilient to the impacts of climate change,
2. Accommodate change in species and habitat distribution
3. Take practical action now
4. Integrate action across all sectors
5. Develop knowledge and plan strategically

We believe that these principles can guide the adaptation of all sectors.

We set out our policy on adaptation in the RSPB publication, *Climate Change: wildlife and adaptation*⁴.

General comments

We welcome the consistent and useful layout of each Draft Action Plan and that they aim to move each sector in the right direction. We recognise the limits of focusing work and action based on sectors but believe that each must be fully cross-referenced and quoted.

Draft Action Plan development and review

RSPB Scotland recommends that the APs are developed further and reviewed regularly ahead of the statutory Adaptation Programme in 2013. We would like the Scottish Government to commit to:

- building the capacity of the 12 sectors to improve the actions plans
- set up a regular review process with 6-monthly reporting
- establish formal development groups for each sector action plan
- establish an Adaptation Stakeholder Group to review all work on adaptation.

Actions

RSPB Scotland agrees with the majority of the content of the APs and the actions included. However, in developing the APs we would like to see the following issues addressed:

- **Lack of Urgency** – The APs need to include more immediate practical actions which will move Scotland more quickly towards implementation of adaptation responses.
- **Overuse of existing measures** – On the whole the APs contain few new measures or actions to realise appropriate adaptation responses.

³ Defra, England Biodiversity Strategy: Climate Change Adaptation Principles: Conserving biodiversity in a changing climate. <http://www.defra.gov.uk/environment/biodiversity/documents/ebs-ccap.pdf>

⁴ RSPB, *Climate Change: wildlife and adaptation – 20 tough questions, 20 rough answers*.
http://www.rspb.org.uk/Images/climatechange20questions_tcm9-170121.pdf



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- **Focus on research** – We seek a better balance of action across the 3 pillars in the APs. We believe there is sufficient justification to act now in all sectors.
- **Lack of strategy and gap analysis** – A strategic view needs to match the threat to sufficient actions.
- **Vague actions** – strong, specific actions are needed in order to determine the likely environmental outcomes, secure full confidence in the results and spur sectors into action now.

Environmental Assessment

RSPB Scotland does not believe that the Action Plans deliver sufficient measures for adaptation. The Environmental Assessments show that too frequently the actions do not specifically target the challenges. We believe that this is because there are gaps in all of the APs and is a reflection that the APs list what is already happening in the sectors rather than identifying what needs to be done.

We broadly agree with the positive view of the impact of the APs on the environment. However the sector AP actions, in their current form, do not provide sufficient detail to be able to confidently assess the full environmental impact.

Specific Comments

We fully endorse the detailed specific comments from LINK but have added some further specific points in the form below.



Adapting to the Changing Climate: Consultation on Environmental Impacts of Adaptation Response Form

This consultation invites responses about the SEA Environmental Report on the draft Sector Action Plans. We also welcome your comments on the draft plans. This form has two parts – the first asks for comments on the Environmental Report and the second asks for comments on the draft Sector Action Plans. Please use this form in responding to this consultation as it will aid our processing of the responses received.

Part 1 - Please provide your feedback on the SEA Environmental Report by completing the following sections

1.1 - Is there any other baseline or environmental information which could be used to further inform the Strategic Environmental Assessment?

Yes No

1.2 - If you answered yes, please provide details and evidence to support your response.

These comments add to those of LINK which we endorse.

In general we believe that the APs need to identify more clearly and in more detail the key environmental challenges for the sectors.

RSPB Scotland is willing, where possible, to work with the Scottish Government to develop baseline knowledge of the impacts of climate change, especially on biodiversity and the natural environment.

The Climatic Atlas of European Breeding Birds is a document which maps potential changes in distribution of all of the continent's regularly occurring nesting birds. It can provide valuable information to guide conservation action aimed at adaptation objectives.

<http://www.rspb.org.uk/news/details.aspx?id=tcm:9-180304>

1.3 - Do you think that the Environmental Report has fully captured the significant effects of the Action Plans?

Yes No

1.4 - In your opinion has anything been overlooked?

Yes No



1.5 - If you answered yes, please provide details and evidence to support your response.

We endorse the comments made by LINK. In summary the main two points are that:

The Environmental Assessment shows that the APs do not deliver sufficient measures for adaptation, taking into account projected climate change. We believe that this is because there are gaps in all of the APs and is a reflection that the APs list what is already happening in the sectors rather than identifying what needs to be done. **We recommend a strategic review of all APs in order to give confidence that threats identified by SCCIP and others will be addressed by sectors in the future.**

We broadly agree that the APs will not cause negative impact on the environment. However, as already stated, **the sector AP actions, in their current form, do not provide sufficient detail to be able to confidently assess the full environmental impact.**

1.6 - Do you agree with all of the recommendations for enhancement or mitigation proposed for the Action Plans?

Yes No

1.7 - If you answered no, please provide details and evidence to support your response.

1.8 - Do you agree with the proposed arrangements for monitoring identified in the Environmental Report?

Yes No

1.9 – If you answered no, please provide details and evidence to support your response.

RSPB Scotland agrees with the proposal to monitor the environmental impact of the APs on an annual basis. But we recommend that the APs themselves are developed further and reviewed on a 6-monthly basis. We also recommend that each Sector Lead establishes a formal Stakeholder forum for the sector to review and develop the AP for the sector they are responsible for.



Part 2 – Please provide any comments on the content of the draft Sector Action Plans by completing the relevant section(s)

2.2- Comments on the draft Biodiversity and Ecosystem Resilience Action Plan:

These comment add to those made by LINK, which we endorse.

Actions

We welcome the list of actions in all three pillars. We would like to see more action now to support the adaptation of biodiversity and ecosystems in order to reflect the urgency needed.

RSPB Scotland is, however, seriously concerned about funding and budgets for biodiversity. The Scottish Government's draft budget for 2011-12 proposes a £9.4 million cut in agri-environment expenditure. SEPA, SNH and the NPAs will face a total budget reduction of £12.2 million. Finances are restricted and therefore we believe that we need to use the limited finances in place to deliver as much benefit as possible. Available sources of funding should aim to deliver multiple benefits and win-wins, e.g. Scottish Water's Sustainable Land Management fund could be purposefully used to meet water quality and biodiversity outcomes; local authority and SEPA funds for flood control should support natural approaches to flood risk management; peatland restoration funding can aim to deliver multiple benefits, including carbon storage and biodiversity. We believe that all sectors should be making plans for action to help biodiversity adapt in addition to helping their sector to adapt.

We also recommend that this AP includes work carried out by NGOs such as RSPB Scotland. Example of RSPB work which could be included in the actions of the AP are:

- **Futurescapes** - This initiative aims to work with partners to increase the area of land managed for nature and can help to fulfil the adaptation objective of accommodating change for biodiversity. <http://www.rspb.org.uk/futurescapes/>
- **Reserves** – Work on our reserves aims to increase populations of target bird species, help them to adapt to climate change and in addition ensure that ecosystems are resilient and functional. A number of them can demonstrate quality habitats delivering significant ecosystem services that benefit the society and the economy. Examples are:
 - Forsinard Flows– carbon storage and sequestration in the peatland habitats.



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- Nigg Bay – natural coastal flood protection in response to rising sea levels through managed realignment and saltmarsh recreation.
- Insh Marshes – natural flood risk management through wetland habitat management.

If you have any queries regarding this response or for more information please contact:

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RSPB Scotland

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