



Stop Climate Chaos Scotland

2nd Floor, Thorn House
5 Rose Street
Edinburgh
EH2 2PR

info@stopclimatechaos.scot
www.stopclimatechaos.scot

National Marine Plan Team,
Scottish Government Marine Directorate,
Victoria Quay,
Edinburgh,
EH6 6QQ

(Sent by email to: nationalmarineplanning@gov.scot)

Dear National Marine Plan Team,

SCCS response “National Marine Plan 2 Planning Position Statement” consultation

Stop Climate Chaos Scotland (SCCS) is Scotland's climate coalition, with over 70 diverse civil society organisations campaigning together for climate action and justice in Scotland. SCCS believes the Scottish and UK Governments must take fast, fair action to address the climate emergency, delivering our fair share of action to limit global temperature rises to 1.5 degrees, championing international climate justice and inspiring others to take action.

SCCS is pleased to respond to [this consultation](#) on the Planning Position Statement (PPS) for Scotland's National Marine Plan 2 (NMP2). SCCS's interest in this issue mainly arises from the climate crisis, caused by anthropogenic emissions of greenhouse gases – and **the need to (a) protect and enhance carbon stores in the marine environment and (b) decarbonise the human activities that take place at sea** (with the same rigour as is applied to terrestrial activities). However, the need to encourage [a transition to lower carbon diets](#) also means that a marine environment that supports the sustainable production of low-carbon seafood should also be a key policy objective. The climate and policy context is outlined in the box below and it is against this background that we offer the observations that follow.

Climate context

From devastating droughts to catastrophic floods, the impact of the spiralling climate crisis could not be clearer, and those with the least responsibility for causing rising global temperatures are facing the most severe - and deadly - consequences.

Scotland has been a global climate leader. When our 2009 Climate Change Act first set targets for emissions' reductions, they were “world-leading” – and this was sustained by the 2019 Act's amendments, which set rightly ambitious targets, based on our historic responsibility, the science, and public mandate. However, on 18 April 2024, [the Cabinet Secretary responded](#) to the Climate Change Committee's latest advice, announcing a proposal to revise the targets framework and seeking to reinvigorate action. Our [analysis of the measures](#) announced indicates that they lack ambition and much additional effort is needed to get anywhere near to delivering the emission reductions needed.

Then, on 18 June 2024, [official statistics for emissions in 2022](#) revealed that the annual target for reductions was missed again – meaning that [Scotland has now missed its targets in nine of the past thirteen years](#). On the following day, the [Cabinet Secretary's statement](#) confirmed that the Government's “*legislative proposals on a new emissions reduction framework will include establishing five-yearly carbon budgets*”; and that “*the bill is introduced as soon as possible after recess*”. This bill has now been introduced, considered, passed and is now the Climate Change (Emissions Reduction Targets) (Scotland) Act 2024.

The 18 April statement listed a number of welcome achievements, contributing to the 50% reduction in emissions since 1990, and reiterated the commitment to achieve Net Zero by 2045. However, it was

disappointingly light on new proposals for meaningful action to ensure that emissions reductions get back on track and that the future budgets and 2045 target can be achieved. The latest [CCC Report to Parliament on Progress in Reducing Emissions in Scotland](#) sets out the current situation very well and highlights that:

- **Current overall policies and plans in Scotland fall far short of what is needed to achieve the legal targets under the Scottish Climate Change Act.** The CCC identifies risks in all devolved policy areas - transport, buildings, agriculture, land use and waste. The CCC did, however, welcome policy actions and proposals related to heating but sought a clearer timeline for the Heat in Buildings Bill.
- **The Scottish Government has delayed its draft Climate Change Plan.** A draft CCP was, previously, expected in November 2023 but has been delayed. Scotland is therefore lacking a comprehensive strategy that outlines the actions and policies required to achieve the 2030 target.
- **Most key indicators of delivery progress are off track**, with tree planting and peatland restoration rates, heat pump installations and community energy, electric van sales and recycling rates significantly so.

With the Climate Change (Emissions Reduction Targets) (Scotland) Act 2024 now passed, attention now turns to the setting of the first carbon budgets, and the production of a Climate Change Plan to meet that budget. As indicated above, there is an urgent need for faster and bolder action to deliver emissions reductions, both immediate and to be set out in the forthcoming plan.

The importance of the marine environment and maritime activities

The climate crisis has been caused by a wide range of human activities. Many crucial sectors that must be decarbonised are wholly or mainly on land (e.g. heat in buildings, land use and agriculture, much of the transport sector). However, the marine environment and maritime activities are also of importance and, notwithstanding issues related to the current inventory, must also form part of cross-government policy action to address the climate emergency.

Blue carbon

In September 2022, SCCS published a briefing on [Action for Blue Carbon: Protecting the marine environment to support action on climate change](#). This highlighted that Scotland's blue carbon environments [were then estimated to] store 9,636 MtCO₂-eq and sequester 28.4 MtCO₂-eq per year. This store is roughly equivalent to the total carbon stored in Scotland's land-based ecosystems and the sequestration rate is three times greater than the annual carbon sequestration of Scottish forestry. Adding emissions related to activities at sea, the wider 'marine carbon' balance is, therefore, vital to efforts to address climate change.

The briefing recommended that:

- The new Climate Change Plan (CCP) should not only refer to blue carbon and ongoing research but also include clear and specific actions to protect such carbon stores, and environmental improvements that will increase sequestration rates.
- In addition to a substantial marine section in the new CCP, we also recommend that the Scottish Government ensures more investment in appropriate research and monitoring. It should also implement a range of 'no regret' actions to protect and enhance blue carbon, including fishing policy reform, improved management of MPAs/HPMAs and coastal management and seaweed protection/cultivation.

While the above was directed at the CCP (originally being prepared then, but now delayed to this year), **these recommendations are also appropriate for sectoral policies related to the marine environment** (which should be consistent with the CCP, and vice versa).

Of course, since the above briefing, further scientific work has added to our knowledge of this issue. This work includes the Blue Carbon Mapping Project undertaken by SCCS members, RSPB Scotland, WWF Scotland and the Scottish Wildlife Trust working with the Scottish Association of Marine Sciences. This report estimated that 244 million tonnes of organic carbon are stored within the top 10 cm of blue carbon habitats around the UK and Isle of Man (of which 152 million tonnes are in Scottish

waters) and has led to [further recommendations for action](#). In addition, Scottish and the UK Blue Carbon Forums have undertaken, co-ordinated or published further research, such as that [on Fjords](#).

Given recent developments, SCCS is currently reviewing its 2022 briefing and an updated version will shortly be published. Meanwhile, it is understood that the Marine Directorate of the Scottish Government is working on the Blue Carbon Action Plan, promised by [the 2023/24 Programme for Government](#), to “improve the management, protection and enhancement of Scotland’s critical blue carbon environments”. As yet, there are no publicly stated plans for consultation or publication date for this action plan.

Maritime sectors

Various marine sectors generate greenhouse gas emissions, either from their own operations, the use of their products or by their impact on the blue carbon resource (or its sequestration potential). The key sectors include oil & gas, energy production, shipping and fishing.

In some cases, policy efforts are already in place or proposed to drive the decarbonisation of these sectors (e.g. [the expansion of the UK ETS to the maritime sector](#)). In other cases, policy is, as yet, unclear (e.g. on [a genuine transition from oil and gas](#), with the Scottish Government’s final energy strategy still unpublished) or non-existent.

In particular, in the absence of a definitive Blue Carbon Action Plan, setting out actions to “improve the management, protection and enhancement” of this crucial resource, there are no policies in place to ensure that the activities of these marine sectors do not adversely impact on the blue carbon resource (or its sequestration potential).

The National Marine Plan 2 Planning Position Statement: general observations

In the light of the importance, outlined above, of Scotland’s marine environment and maritime activities in addressing the climate crisis, the National Marine Plan is a crucial policy tool to secure (some of) the Scottish Government’s climate objectives. Indeed, given the respective duties and other responsibilities set out in the Climate Change (Scotland) Act 2009, as amended, and the Marine (Scotland) Act 2010, **SCCS contends that a central objective of the National Marine Plan should be to contribute the marine elements of the actions needed to address the climate emergency.**

Thus, SCCS welcomes the observation, in the Ministerial Foreword to the consultation paper, that:

- “Scotland’s seas, like other nations’, face growing pressures from the twin crises of climate change and nature loss. Without halting and reversing this marine environmental decline, we risk our ability to harness economic and social benefits from our marine resources now and in the future. There is growing evidence of the impact of climate change on the marine environment, including on the ocean’s ability to adapt to climate change.”
- “The 2024/25 Programme for Government, setting out our four main priorities for this parliamentary term, [includes] ... ‘tackling the climate emergency’.”
- “A just transition to a net zero society by 2045 will require transformation in the use of our seas; including decarbonisation across marine sectors and their supply chains, and an energy transition delivered through carbon capture and storage, hydrogen production and storage, and realising the opportunities from offshore renewables including ScotWind. Scotland will play a vital role in driving ongoing change in the energy mix across the UK and supporting our transition to net zero.”

It is also welcome that, in the “Purpose of Plan” section (3.2), it is indicated that:

- “The NMP2 will help to tackle the twin crises of climate change and nature loss; supporting our transition to net zero through the sustainable management of our shared marine space, while considering just transition principles in the marine planning process”.

Finally, the first high-level objective to “mitigate and adapt to the impacts of climate change in Scotland’s seas” and the proposal in 5.1.2 that the “NMP2 will include dedicated policy(ies) on climate

change mitigation and adaptation, setting out specific implementation criteria to guide decision makers” are both welcome.

However, despite these encouraging statements, it is disappointing that the Planning Policy Statement, as currently drafted, does not (as yet?) set out clear definitive objectives and policies to deliver on these welcome general commitments. Our more specific comments below set out the reasons for this disappointment and concern. However, should the lack of clear and definitive policies simply be because these will follow in the fully drafted, final version of NMP2, we hope the Scottish Government will make this clear. Otherwise, there is a need to improve the substantive elements of the Planning Policy Statement to match the rhetoric of these earlier statements.

The National Marine Plan 2 Planning Position Statement consultation: response to specific questions

- 1. Do you agree with the updated wording for the high-level objectives (HLOs) and the focus they set out for policies in the National Marine Plan 2 (NMP2)?**
- 2. Please add any additional comments on the high-level objectives (HLOs) in the space provided below.**

As indicated above, we welcome that one of the five HLOs is to “Mitigate and adapt to the impacts of climate change in Scotland’s seas”. However, while we understand the potential benefits of fewer and shorter HLOs (than in the current NMP), we are also concerned that this reduces clarity – and, in the absence, of detailed policies on implementation (possibly to be included in the subsequent plan itself?) they do not give any indication of how they will be achieved. It adds little beyond the existing duty, which binds the Scottish Government to include “objectives relating to the mitigation of, and adaptation to, climate change,”

This concern is more significant for the second HLO related to marine nature. The new HLO for nature reads: “Protect and enhance Scotland’s marine nature to support functioning and resilient ecosystems”. Given the extensive overlap between ‘marine nature’ and Blue Carbon resources, this is welcome. However, it is considerably less clear and far more subjectively applied than the existing General policy 9 which states:

“Development and use of the marine environment must: (a) Comply with legal requirements for protected areas and protected species. (b) Not result in significant impact on the national status of Priority Marine Features. (c) Protect and, where appropriate, enhance the health of the marine area.”

Thus, SCCS considers that these two HLOs should be made considerably clearer – to reduce uncertainty for maritime sectors and re-assure all stakeholders that the Scottish Government is committed to action to meet the objectives. Thus, we would suggest that the first be amended to read:

Mitigate and adapt to the impacts of climate change in Scotland’s seas, by taking action to decarbonise all maritime sectors and improving the management, protection and enhancement of our Blue Carbon resource.

The second might be amended to read:

Safeguard and enhance Scotland’s marine nature, including by complying with legal requirements for protected areas and protected species and not permitting a significant impact on the national status of Priority Marine Features.

3. What are your views on the policy ideas proposed under the 'Climate Change Mitigation and Adaptation' section?

As indicated above, SCCS welcomes the proposal in 5.1.2 that the “NMP2 will include dedicated policy(ies) on climate change mitigation and adaptation, setting out specific implementation criteria to guide decision makers”. However, the specific proposals under this section (on “Significant Weight To Climate And Nature Crisis” and “Climate Change Design, Siting And Decarbonisation”) are both currently vague and lacking substance.

This is a concern exemplified by the frequent use of “could”. Thus, for instance, it would be significantly enhanced (providing greater certainty and clarity of consistency with climate change duties) if the statement: “NMP2 could include a translation of NPF4 Policy 1, giving significant weight to the climate and nature crises, with wording to reflect marine decision-making and setting out criteria for implementation” were to be simply improved to:

“NMP2 should include a translation of NPF4 Policy 1, giving significant weight to the climate and nature crises, with wording to reflect marine decision-making and setting out criteria for implementation.”

Likewise, the statement “For the siting of projects, proposals could demonstrate how they seek to avoid or protect habitats with important functions in supporting resilience and mitigation to climate change, such as blue carbon stores and habitats that provide shoreline protection” should be amended to:

“For the siting of projects, proposals will be required to demonstrate how they seek to avoid or protect habitats with important functions in supporting resilience and mitigation to climate change, such as blue carbon stores and habitats that provide shoreline protection”.

In addition, this proposed policy statement relates only to the "siting of projects". In fact, as the duty under s.15 of the Marine (Scotland) Act 2010 relates to all "enforcement and authorisation decisions", including activities and uses, the plan should set out objectives and policies related to those activities and uses (and how such decisions will fulfil the s.4 duty in relation to climate change). In particular, the statement should set out policies that will be introduced to achieve the decarbonisation of maritime sectors and to “improve the management, protection and enhancement of Scotland’s critical blue carbon environments”.

Finally, the policy statement should recognise (as should the Scottish Government’s Climate Change Plan and other related policies) the importance of transitioning to a low carbon diet as part of addressing the climate emergency. Given this, the policy statement should seek to ensure that marine management decisions (including “enforcement and authorisation decisions”) support sustainable harvesting of low-carbon seafood, while not permitting damaging activities.

4. What are your views on the policy ideas proposed under the 'Nature' section of the Planning Position Statement (PPS)?

As indicated above, policies in relation to nature are, in fact, also important for the mitigation of and adaptation to the climate crisis. This reflects the linkages between the climate and nature crises (which is reflected in the statement) and the overlap between the blue carbon resource and natural habitats.

It is therefore welcome that it is stated that “NMP2 will reflect the outcomes from wider ongoing work to develop a restoration plan for Scotland’s seas and to map areas of blue carbon potential”. However, this is then undermined by indicating that “NMP2 could support opportunity mapping for restoration, enhancement, or nature-based solutions for climate mitigation and adaptation and set out a requirement to consider this evidence in decision-making” and “NMP2 could introduce a policy that preserves restoration and enhancement sites from wider activity that may have an adverse impact on the site”. The latter two uses of “could” should be upgraded to “will”.

The policy proposals in relation to Priority Marine Features is similarly weak and lacking certainty; and is potentially a serious weakening of the current policy – in that it implies that the NMP2 could allow harms that are not currently allowed under the existing plan. This is because, under the NMP1, uses and developments must not have an impact on the national status of a Priority Marine Features.

As Priority Marine Features, such as seagrass (which [is also an OSPAR threatened habitat](#)), are crucial to Scotland’s blue carbon resource, the requirement not to have an impact on national status must be retained.

6. What are your views on both the cross-sector, and sector-specific policy ideas proposed under the 'Sustainable Marine Economy' section?

As with other sections, SCCS considers that the proposals set out to date are lacking substance. Unless this is addressed in the final version and/or in NMP2 itself, it will result in a marine plan that is missing much of what was included in the current National Marine Plan.

This is especially the case in regard to fishing – the activities of which have an enormous potential to impact on Scotland’s blue carbon resource. Yet, it is stated that “zonal planning for fisheries in NMP2 is not currently appropriate as there are a range of policies in development” – despite the fact that zonal planning of fisheries is potentially one of the most significant tools available to “improve the management, protection and enhancement of Scotland’s critical blue carbon environments”.

It is unclear by what criteria have been used to permit this conclusion regarding “appropriateness” to be reached, especially as zonal planning is an obvious means to ensure fisheries impacts are managed and to ensure fishing can operate in a busy marine space as well as to protect blue carbon. Moreover, fisheries are established, by the [Scottish Marine Assessment \(2020\)](#) to be the most significant pressure in most marine regions and are the key pressure which needs to be addressed to meet several failed Good Environmental Status indicators. Failing to address these issues in the NMP2 is incoherent and inconsistent with the claim that NMP2 is taking an “ecosystem based approach”.

Related to the above, we do not support the proposal to drop or reduce the detail addressed by sector specific objectives; this will create an incoherent plan and likely fail both the stated purpose of the plan when the Marine (Scotland) Act 2010 was passed or ability for it to conform with the Marine Policy Statement. This reduces the usefulness and impact of the plan compared with its current version; while the current version was not perfect, the proposal set out here would make NMP2 less useful rather than more.

In particular, we are concerned about the removal of sea fisheries objectives. For the reasons set out above, these sector specific objectives are crucial, if well framed, to addressing the climate crisis through emissions reductions, protection of blue carbon and supporting a transition to a low carbon diet. We do, however, welcome the removal of the oil and gas sector goal to “maximise the recovery of reserves” and note that such objectives would no longer be consistent with the need for this plan to be consistent with the climate change act and, if retained, should be amended to relate to a wind down in production and a just transition.

Thank you again for the opportunity to respond to this consultation and I hope the general, and section-specific, comments above are useful – and can be taken into account as the Scottish Government finalises the Planning Policy Statement and, subsequently, the National Marine Plan 2. SCCS would, of course, be pleased to discuss these issues with Ministers and/or officials if that would be useful.

Yours faithfully,



Becky Kenton-Lake
Stop Climate Chaos Scotland