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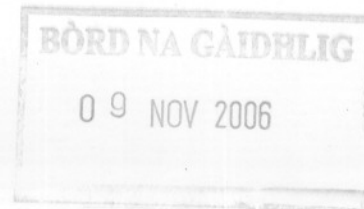
**SCOTTISH
NATURAL
HERITAGE**



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7 November 2006



Dear Sir

Scottish Natural Heritage welcomes the opportunity to submit a response to Bòrd na Gàidhlig's draft National Plan for Gaelic (Plana Nàiseanta na Gàidhlig) and the draft guidance on Gaelic Language Planning (Stiùireadh air Planaichean Gàidhlig). We seek an opportunity here to input into the development of the documents in partnership with other key stakeholders and interested parties. As suggested, we have used the questions outlined in both documents to structure our response.

Plana Nàiseanta na Gàidhlig

Is the vision of the draft Plan one in which you can share?

The vision of the plan outlined in draft touches on a number of areas directly related to activities undertaken by SNH business. These include work in awareness raising, education, publications and the wider relationship between the Gaelic language and interpretation of the environment. SNH supports the recognition of Scotland as a multilingual society and the equal respect that Gaelic has within that society. This ethos is certainly one that we aim to build on in recognition of the needs of our English- and Gaelic-speaking customers and captured succinctly in the summary of 'geographical flexibility' (p9) noted at the start of the plan.

We wholeheartedly endorse and support the overall vision within the draft plan.

In the light of your response to the above question, are the proposed sectoral projects (p13,19, 25, 31 and 37) essential to the meeting of the action area aims for 2012? If not, why not?

In principle, SNH supports the targeted use of projects to support the implementation of the plan during its lifetime. There are obvious benefits to SNH in working towards delivery of some 'sectoral' projects (particularly those identified under Vitality and Culture). The nature of our work however, would not negate us from indirectly supporting the outcomes expected from other sectoral projects identified.

A general comment here would be the use of 'sectoral' to identify project areas. It may be more helpful to use a descriptor making a clear reference to what they are actually aiming to deliver.

*Working with Scotland's people to care for our natural heritage
Ag obair còmhla ri muinntir na h-Alba airson math ar dualchas nàdair*



INVESTOR IN PEOPLE

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We would encourage the Bòrd to take a programmed approach to managing the outcomes expected from delivery of 'sectoral' projects (such as that suggested by the Office of Government Commerce) ensuring that the benefits from each project are realised and communicated widely.

Are the outcomes for the twenty themes and the priorities for tackling them correctly outlined and prioritised? If not, why not?

The following thoughts are offered on the above question:

- Greater use and visibility of Gaelic in the workplace (p16) should have a higher priority as the workplace offers the opportunities to increase the use of Gaelic outwith the home;
- In relation to Gaelic plans (p20), SNH should specifically be named;
- Under Support - Priorities (p23), it would be expected that other Agencies with an environmental remit should be included (e.g. Forestry Commission, Scottish Environment Protection Agency). It may be helpful if SNH were specifically named here; and
- In respect of the elements relating to Culture (p34), specifically the heritage aspects, SNH should be included here as a primary player (a general comment here worth reinforcing is the lack of overall appreciation within the culture section of the rich *natural* heritage resource we have which can be interpreted beneficially through Gaelic).

It is also worth noting that SNH supports the move towards standardisation of Gaelic identified in the plan but from experience, has learnt that linguistic variation often helps us interpret the natural heritage from different perspectives. SNH feels it important to celebrate the language diversity in parallel with biodiversity using it as a bridge to access an often sceptical customer base. Our ultimate aim would be for SNH to become the lead repository for natural heritage knowledge interpreted through Gaelic.

In the light of your response to the above question, what projects do you view as being essential to implementing these priorities (some examples are offered in Appendix I)?

SNH considers that there are two key 'quick-win' areas in particular which are critical in terms of assisting the implementation of priorities. These are:

- Training provision across all levels of experience from learner to native speaker within the organisation; and
- Support for integrating Gaelic into every day use within the organisation.
- Website.

And are the right organisations identified as being the primary players in implementing these priorities?

Our work particularly in relation to education, interpretation, publication and awarding of grants, and the relationship between natural heritage interpretation and Gaelic, places SNH in a position of responsibility as custodians of Gaelic natural heritage interpretation. In this context, it is surprising that SNH has not been identified as taking a lead under the culture/heritage section.

If you are responding on behalf of an organisation, how do you see yourselves contributing to the success of the National Plan?

Whilst SNH may not have a central role to play in terms of the delivery of the plan, in common with many other Agencies, it has an important part to play. SNH recognises our responsibility in relation to engaging with people in Gaelic-speaking communities and by following the spirit of the plan we believe we can benefit both the natural heritage and consequently the linguistic heritage of Scotland.

Do you have any other comments on the draft National Plan which you would like to submit?

A general comment, which may be helpful, is that we found the format and layout of the plan difficult at times to follow and the language used awkward at times (i.e. 'culture function', 'sectoral', 'corpus development', 'acquisition planning'). We look forward to moving into the next stages with the plan together though and would encourage a continued emphasis on communication and consultation carried forward into delivery.

Stiùireadh air Planaichean Gàidhlig

Are you satisfied with the interpretation of equal respect on page 8?

SNH feels that the definition of equal respect is clearly defined. What the Guidance may benefit from however, is a one-line statement, easily recited, that communicates the principles of equal respect succinctly. SNH particularly supports the statement that equal respect does not equal identical treatment.

Are the issues concerning the level of provision on pages 9-10 adequately tackled?

Fundamental to the question of provision is the progressive approach noted (p9) and the function of the organisation (p10). SNH favours an incremental 'stepped' approach within that, building on previous successes and setting ambitious targets most appropriate to SNH's business for expansion of provision. For example, concentrating on our website will be an early priority allowing us to reach a national (and indeed international) audience.

Is the advice in each section clear and helpful?

The advice provided is understandable and provides enough background information to allow an assessment of relevance to the functions of SNH. It appears to be comprehensive in relation to our own activities.

Are the suggestions from page 14 for the content of a Gaelic language plan comprehensive enough and appropriate to the requirements of Gaelic development?

We provide a number of observations in relation to this:

- The section referring to increasing language capacity (p17) could do more to assist those already learning Gaelic or continually developing their language skills;
- The important role of public agencies and authorities in providing educational materials and opportunities should be recognised under 'Education Functions' (p19);
- The natural heritage should be included explicitly under 'culture functions' (p19); and

- There was confusion noted over what was actually meant by bullet points 11 and 16 on page 16. As SNH has a significant publications interest, clarification of these illustrations would be helpful.

Despite this, there is sufficient latitude within the guidance for us to translate our functions into a meaningful plan.

Are the percentages proposed on pages 18-19 and page 22 for the triggering of various policy provision and employment requirements, realistic and appropriate?

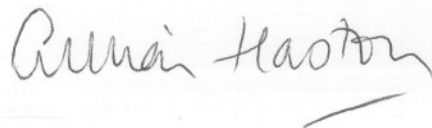
A general comment here is the use of percentages to 'trigger' a certain approach to language development. It is unclear how the percentages have been derived and on what basis they have been ratified. The figures appear to be too 'round' suggesting that little thought has been put into them. It would also be helpful to have a geographical depiction of the latest census figures to give a feel for how each of the areas will impact geographically across the country. We would view the percentages as 'guidance' and as such should be viewed in that context.

If you are responding on behalf of an organisation, would the draft Guidance adequately assist in drawing up a Gaelic language plan?

Irrespective of comments above, SNH feels that the guidance will be useful in implementing our own Gaelic Language Plan.

We trust that the comments and suggestions above will allow Bòrd na Gàidhlig to continue to improve and refine both of these important documents. We would also like to take this opportunity to assure the Bòrd of SNH's continued support in delivery of our National Plan.

Le gach dhurachd



Gillian Haston
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