

Mr John Fitzpatrick
Deputy Director, CAP Implementation
Department for Environment, Food and Rural Affairs
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13 February 2015

Dear Mr Fitzpatrick,

Thank you for the invitation to contribute to Commissioner Hogan's review of CAP implementation. We are writing directly to you as the UK Government will be leading on the UK response to the European Commission.

Scottish Environment LINK is a coalition of environmental groups working for the sustainable development of Scotland. Scotland itself comprises nearly one-third of the UK, and 73% of that land is in agricultural use. A sustainable agricultural system is therefore essential for a sustainable Scotland, whether that is in terms of food production, biodiversity, ecosystems, or landscape.

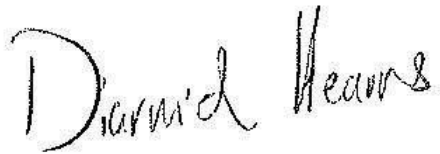
We recognise that the CAP has become unwieldy in both its design and its delivery. We would attribute this to the policy development process largely rolling forward what was done in the previous Programme, rather than starting from first principles: what are the public benefits sought and how can we deliver them?

The current CAP is not delivering a more sustainable agricultural system and, in considering how the policy can be improved, we would make the following recommendations:

- The fundamental rationale for CAP has to be a sustainable agricultural system, delivering public benefit (economic, social and environmental)
- Public interventions should be justified on the basis of delivering public goods, aiming to deliver those benefits that the market fails to provide or underprovides, particularly in areas of High Nature Value Farming & Forestry
- Good practice also has to be underpinned by regulation, to ensure that minimum standards are maintained
- CAP has evolved over decades and reforming it will not be a simple process
- Simplification should not be pursued for its own sake – it should be as complex as required but no more so.

The CAP Programme is the single largest subsidy programme in the European Union. At a time of reducing public expenditure, and a demand for greater economic, social and environmental justice, the future CAP will need to be reformed to deliver these benefits or risk losing its legitimacy.

Yours sincerely

A handwritten signature in black ink that reads "Diarmid Hearn". The signature is written in a cursive, slightly slanted style.

Diarmid Hearn
Convenor, Agriculture Taskforce
Scottish Environment LINK

This letter is supported by the following organisations:

Amphibian and Reptile Conservation
Archaeology Scotland
Butterfly Conservation Scotland
Nourish Scotland
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RSPB Scotland
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