

**Response to the Scottish Government’s consultation on the
Future CAP direct payments in Scotland from
2015**

**By the Scottish Environment LINK Agricultural
Taskforce**

March 2014



Scottish Environment LINK is the forum for Scotland's voluntary environment organisations, with over 30 member bodies representing a broad spectrum of environmental interests with the common goal of contributing to a more environmentally sustainable society. The LINK Agricultural Taskforce leads on issues dealing with Common Agricultural Policy and the Scottish Rural Development Programme.

Summary

Scottish Environment LINK’s Agriculture Task Force welcomes the opportunity to respond to the Scottish Government Consultation on [Future CAP Direct Payments in Scotland from 2015](#). This is a paper version of the response submitted online with additional explanation behind our answers. We remain disappointed that the form of the online questions leads to ambiguous answers and limited scope to comment on the various proposals offered. Questions where LINK does not have a view or unanimity of opinion have not been answered.

Within the details of this consultation the particular aspects we would urge in particular the adoption of:

- moving to area rather than historic payments by 2017
- more rigorous definitions for greening & cross compliance requirements
- commitment to greening equivalence measures
- access and mapping of all environmental and landscape features within the life of the programme (and ideally by 2017)

Concerns include:

- 25€ per hectare being too low for rough grazing
- Delay in reforming LFASS & moving to ANC
- No recognition of HNV land
- The weakness of GAEC & Greening

To aid interpretation we have colour-coded our answers to express our support or our opposition to the proposals tabled.

	Strongly against
	Strongly for
	Mildly for
	No great preference

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Question 1: The Scottish Government proposes that Payment Regions should be based on historical land type designations. Do you agree?

- a) Yes;
- b) No;
- c) No view

Question 2: The Scottish Government proposes that having two Payment Regions will allow sufficient account to be taken as regards to the difference between land of differing quality without causing undue complexity for farmers and officials. Do you agree?

- a) Yes;
- b) No;
- c) No view.

Question 3: The Scottish Government proposes that Region 1 should be arable, temporary grass and permanent grassland and Region 2 should be rough grazing. Do you agree?

- a) Yes;
- b) No;
- c) No view

Question 4: In considering future Payment Regions, please rank your top 3 options in order of preference (1 = first priority, 2 = second priority etc.).

- a) Proposed Scottish Government approach of 2 regions based on land type; **1st priority**
- b) 3 regions based on land type; **3rd priority**
- c) 2 regions based on LCA; **2nd priority**
- d) 3 regions based on LCA;
- e) Single payment region;
- f) Other type of payment region designation;
- g) No view

*LINK would ideally like to see payment rates based on public benefit and not related to land agricultural capability and type. In particular, we would wish to see better and faster correlation between the coming shift from LFASS to ANC reflected in Pillar 1 payments that better compensate for environmental, climatic and geographic disadvantage. In principle this would lead us to support 4(e) Single payment region but we recognise that this is not practical in the short term, but that **it should be Scottish Government's long term objective to focus area payments on public benefit outcomes.***

Question 5: The Scottish Government thinks the final area rate for mandatory direct payments (i.e. Basic Payments plus Greening Payments) on land in the Rough Grazing Payment Region should be between €20-25/ha. Do you:

- a) Support the Scottish Government's proposal;
- b) Support a lower rate since any rate over €20-25/ha would overcompensate large holdings;
- c) Support a higher rate since any rate under €20-25/ha would undercompensate smaller active mixed farms;
- d) Not support the proposal for other reasons;
- e) No view.

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Question 6: How quickly should we move to average payment rates in a region?

- a) Flat area rate from Day 1 (2015);
- b) Standard internal convergence to achieve a flat area rate in 2017;
- c) Standard internal convergence to achieve a flat area rate by 2019;
- d) Irish tunnel so that the range of payment entitlement values is narrowed but does not reach the flat area rate by 2019;
- e) No view.

Question 7: How would you prioritise the following factors which we need to take into account in deciding how to move to area based payments (1 = first priority, 4 = lowest priority etc.)

- a) Simplicity; **3rd priority**
- b) Clear and accurate forecasts of future payments to each farmer; **2nd priority**
- c) Allowing farmers time to adjust to change; **4th priority**
- d) Avoid undue delay to those seeking fairer payments; **1st priority**
- e) No view.

Question 8: The Scottish Government proposes that the value of future Basic Payments be calculated based on the value of the SFP entitlements held by farmers in 2014 rather than on the amount of SFP paid to a farmer in 2014. Do you agree?

- a) Yes;
- b) No;
- c) No view.

Question 9: The Scottish Government proposes to keep the minimum threshold at the present level, so that control of at least 3 hectares of eligible land would be needed to claim future direct payments. Do you agree?

- a) Agree – the minimum threshold should remain at 3 hectares;
- b) Disagree because the minimum threshold should be 1 hectare;
- c) Disagree because the minimum threshold should be 5 hectares;
- d) Disagree because the minimum threshold should be €100;
- e) No view.

LINK would prefer to support the position of Soil Association & Nourish Scotland that 2 hectares is the appropriate threshold for future direct payments. This option is not offered in the questions listed.

Question 10: The Scottish Government is not minded to add further business types to the negative list, to be automatically excluded from payments unless they can demonstrate that they are active farmers. Do you agree?

- a) Yes;
- b) No;
- c) No view.

Question 11: If the detailed rules allow, the Scottish Government intends to require land that is naturally in a state suitable for grazing to have a minimum stocking density in the region of 0.05LU/ha (i.e. roughly 1 sheep on 3 hectares) with derogations, for future direct payments. Do you agree?

- a) Agree that a stocking rate of around 0.05 LU/ha (with derogations) should be required under the active farmer requirement;
- b) Disagree because any minimum stocking density should be lower than 0.05LU/ha;
- c) Disagree because any minimum stocking density should be higher than

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0.05LU/ha;

d) Disagree for some other reason;

e) No view.

Question 12: If we are not able to use a minimum stocking density requirement to meet the minimum activity requirement, should we instead require farmers to demonstrate that they are “active” farmers by having plans to ensure a structured flock or herd, for example, plans showing a replacement strategy?

a) Yes;

b) No;

c) No view.

Question 13: What should we be aiming for when considering an appropriate minimum activity requirement –please rank your top 3 options in order of preference (1 = first priority, 2 = second priority etc.).

a) Stop slipper farming even if this imposes burdens on active farmers;

b) Balance the wish to stop slipper farming against the likely burden on genuine active farmers;

c) Do the minimum necessary to meet European requirements even if this means slipper farming continues in Scotland; **2nd priority**

d) Workable and easy to understand rules for farmers; **3rd priority**

e) Appropriate procedures for environmental sensitive land; **1st priority**

f) No view.

Question 14: Comment Box on the minimum activity requirement (200 word maximum)

LINK believes that the issue of slipper farming is overstated particularly as payments are moving to more equality through the new area payments and we are concerned that the proposed minimum stocking density will exclude significant areas of rough grazing land of high nature and other environmental value – inconsistent with other Scottish Government and EU objectives. We support proposals to encourage farmers to have a grazing/moorland management plan.

Question 15: The Scottish Government does not propose to use the reduction coefficient that can be applied when payment entitlements are allocated. Do you agree?

a) Yes;

b) No;

c) No view.

Question 16: The Scottish Government does not propose to use the reduction coefficient that can be applied when payment entitlements are activated. Do you agree?

a) Yes;

b) No;

c) No view.

Question 17: Which one of the following options for degressive reductions do you prefer?

a) Apply the mandatory 5% degressivity when a business’s Basic Payments are greater than €150,000;

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- b) Apply the mandatory 5% degressivity plus additional reduction of 25% when a business's Basic Payments are greater than €300,000;
- c) Apply the mandatory 5% degressivity plus a cap on Basic Payments so that maximum amount allowed to a business would be €500,000;
- d) Apply the mandatory 5% degressivity plus additional reduction of 25% when a business's Basic Payments are greater than €300,000 plus a total cap on Basic Payments of €500,000;
- e) Should apply other types of optional degressivity in addition to the mandatory 5% degressive reduction of Basic Payments to a business which is greater than €150,000;
- f) No view

LINK members have differing views on the answer to this question. We therefore choose to not answer.

Question 18: The Scottish Government proposes to use the windfall provision in cases where the termination or ending of a lease leads to a windfall gain for the farmer concerned. Do you agree?

- a) Yes;
- b) No;
- c) No view.

Question 19: The Scottish Government thinks that Scotland should take full advantage of a siphon on sales of entitlements without land. Do you agree?

- a) Yes;
- b) No;
- c) No view

Question 20: The Scottish Government thinks that the Greening payment should be regionalised and paid on an area basis. Do you agree?

- a) Agree the Greening payment should be regionalised, with each region having its own Greening payment rate;
- b) Disagree because should pay Greening payment as a flat area rate across Scotland;
- c) Disagree because should use the derogation that allows Greening payments to take account of Basic Payment value;
- d) No view.

LINK members all want to see greening payments make a significant difference to the environmental condition of farmland by making environmentally sensitive farming attractive and financially viable across Scotland. Danger that low rate for rough grazing will lead to insufficient greening compensation for farmers in some of the most environmentally significant areas of Scotland and the EU e.g. the machair areas.

Question 21: Do you think the Scottish Government should use the option to designate further environmentally sensitive permanent grassland areas outwith Natura sites?

- a) Yes;
- b) No, because other regulations already protect these areas;
- c) No, because proposals are too restrictive;
- d) No, because it creates additional complexity;
- e) No, for another reason;

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f) No view.

Significant areas of environmentally sensitive grassland survive outwith Natura areas, especially in the lowlands, where they are most at risk from intensification.

Question 22: Do you think that the Scottish Government should continue to monitor the area of permanent grass at national level?

a) Yes;

b) No – would prefer area of permanent grassland to be monitored at holding level;

c) No view.

Question 23: Which of the following areas do you think we should consider as being part of EFA in Scotland (bearing in mind the measurement and verification issues for landscape features):

a) Fallow

b) Buffer strips

c) Landscape features

d) Agro-forestry supported under SRDP

e) Uncultivated strips along forest edges

f) Short rotation coppice

g) Afforested areas supported under SRDP

h) Catch crops or green cover

i) Nitrogen fixing crops

j) No view.

Question 24: Do you think we should consider the option to implement the EFA requirement at regional level?

a) Yes;

b) No, because of risk of penalty due to behaviour of others;

c) No, because too complex and difficult for Scottish Government to verify/inspect;

d) No, because it is unlikely that sufficient farmers will wish to collaborate in this way;

e) No, for other reason;

f) No view.

Question 25: Do you think we should consider the option to allow groups of farmers to implement the EFA requirement collectively?

a) Yes;

b) No, because of risk of penalty due to behaviour of others;

c) No, because too complex and difficult for Scottish Government to verify/inspect;

d) No, because it is unlikely that sufficient farmers will wish to collaborate in this way because it would be too onerous or too complex for farmers to organise;

e) No, for other reason;

f) No view.

LINK feels that regionalising or allowing groups of farmers to allow collective EFA requirements increases complexity and raises the risk of trading of greening requirements reducing beneficial outcomes from this measure.

Question 26: We would like your views on whether optional weighting and conversion factors should be used when calculating the area of EFA on holdings?

a) No, because this would weaken the benefit delivered by the EFA requirement;

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- b) No, because this would increase complexity for farmers and Scottish Government;
- c) No, for other reason;
- d) Yes, because the required EFA area should be less than 5% of arable land;
- e) Yes, because it is important to recognise the variable level of environmental benefit delivered by different types of EFA;
- f) Yes, for other reason;
- g) No view.

Question 27: Should we consider using the equivalence option in Scotland and if so how?

- a) Farmers should be required to meet only basic Greening requirements;
- b) Equivalent practices should be optional for farmers;
- c) Farmers should be required to deliver their Greening obligations through equivalent practices;
- d) Farmers should be required to deliver their Greening obligations through an equivalent certification scheme which could include a combination of standard Greening requirements and equivalent practices;
- e) No view.

LINK support proposals to deliver an equivalence scheme, as is being developed through the Greening Subgroup of the Scottish Government CAP Stakeholder Group. This would maximise the environmental benefits of greening. If regionalisation of greening payments is decided, then the basic payment for rough grazing should be sufficiently high to lead to meaningful greening actions being taken.

Question 28: As far as the Greening crop diversification requirement is concerned, how do you think it should be implemented in Scotland?:

- a) Through the standard Greening crop diversification requirement;
- b) As the standard crop diversification requirement but delivered through an equivalent certification scheme;
- c) Through one or more of the equivalent practices listed above, allowing farmers to choose which to implement on their holding if more than one is offered;
- d) No view.

Question 29: If we had an equivalent crop diversification requirement should it include:

- a) Equivalent crop diversification requirement set out above;
- b) Crop rotation requirement set out above;
- c) Winter soil cover requirement set out above;
- d) Catch crops requirement set out above;
- e) None of these. The crop diversification requirement should be delivered through the standard Greening requirement;
- f) No view.

Question 30: As far as the Greening permanent grassland requirement is concerned how do you think it should be implemented in Scotland?

- a) Through the standard Greening Permanent grassland measure;
- b) As the standard Greening Permanent Grassland requirement but delivered through an equivalent certification scheme;
- c) Through one or more of the equivalent practices set out by Europe (listed above), with farmers able to choose the most appropriate practice on their holding;
- d) No view.

Question 31: If we had an equivalent permanent grassland requirement in a certification scheme, which equivalent practice/s do you think should be included on meadows and pastures?

- a) Cutting regime or appropriate mowing (specifying dates, methods and limits);
- b) Maintenance of landscape features on permanent grassland and control of scrub;
- c) Specified grass varieties and/or seeding regime for renewal depending on the grassland type, with no destruction of high nature value grassland;
- d) Evacuation of forage or hay;
- e) Appropriate management for steep slopes;
- f) Fertiliser regime (including nutrient efficiency measures);
- g) Pesticide restrictions;
- h) None of these. The permanent grassland requirement should be delivered through standard Greening requirement;
- i) No view.

Question 32: If we had an equivalent permanent grassland requirement in a certification scheme, which equivalent practice/s you think should be included on extensive grazing systems?

- a) Extensive grazing (specifying timing and maximum stocking density);
- b) Shepherding or mountain pastoralism;
- c) Using local or traditional breeds for grazing the permanent grassland;
- d) None of these. The permanent grassland requirement should be delivered through the standard Greening requirement;
- e) No view.

Question 33: As far as the EFA requirement is concerned how do you think it should be implemented in Scotland?

- a) Through the standard Greening EFA requirement;
- b) As the standard EFA requirement but delivered through an equivalent certification scheme;
- c) An equivalent requirement which ensures that at least 5% of arable land is devoted to one or more of the equivalent EFA types set by Europe (listed below);
- d) No view.

Question 34: If we had an equivalent EFA requirement which areas do you think should be able to count towards this requirement?

- a) Ecological set-aside;
- b) "Buffer zones" e.g. along hedgerows and water courses;
- c) Management of uncultivated buffer strips and field margins;
- d) Borders, in-field strips and patches managed for wildlife or specific fauna;
- e) Management of landscape features;
- f) Keeping arable peaty or wet soils under grass;
- g) Production on arable land with no use of fertiliser and/or pesticides, no irrigation and not sown with the same crop two years in a row and on a fixed place;
- h) Conversion of arable land into extensively managed permanent grassland;
- i) None of these. EFA should be delivered through the standard Greening EFA requirement;
- j) No view.

Question 35: The Scottish Government thinks that GAEC 1 – the requirement to establish buffer strips along water courses – should include a ban on cultivation within 2m of surface water or wetland? Which of the following options do you prefer? Tick one.

- a) A ban on cultivation and fertiliser and pesticide use within 2m of a water courses;
- b) A ban on cultivation only within 2m of a water course;
- c) No ban on cultivation within 2m of a water course;
- d) None of the above;
- e) No view.

Question 36: The Scottish Government does not intend to introduce new requirements into GAECs 2, 3, 4 and 5. Do you agree?

- a) Yes;
- b) No;
- c) No view.

Question 37: The Scottish Government does not intend to introduce new requirements other than the compulsory ban on the burning arable stubble as set out by Europe. Do you agree?

- a) Yes;
- b) No;
- c) No view

Question 38: In relation to hedges, which of the following options for GAEC 7 “Retention of landscape features” do you prefer? Tick one

- a) A ban on cultivation and fertiliser and pesticide use within 2m of a hedge;
- b) A ban on cultivation only within 2m of a hedge;
- c) No ban on cultivation adjacent to a hedge;
- d) None of the above;
- e) No view.

Question 39: In relation to dry stone walls, which of the following options for GAEC do you prefer? Tick one

- a) A ban on cultivation and fertiliser and pesticide use within 2m of a dry stone wall;
- b) A ban on cultivation only within 2m of a dry stone wall;
- c) No ban on cultivation adjacent to a dry stone wall;
- d) None of the above;
- e) No view.

Question 40: The Scottish Government does not intend to use the option to allow GAEC 7 to require farmers to tackle the spread of invasive species (click all that are relevant).

- a) Agree GAEC 7 should not be expanded to include invasive species;
- b) Disagree, should extend GAEC 7 to include *Rhododendron ponticum*;
- c) Disagree, should extend GAEC 7 to include giant hogweed (*Heracleum mantegazzianum*);
- d) Disagree, should extend GAEC 7 to include Japanese knotweed (*Fallopia japonica*);
- e) Disagree, should extend GAEC 7 to include Himalayan balsam (*Impatiens glandulifera*);
- f) None of the above;
- g) No view.

Question 41: Comment box for comments on greening measure, Equivalence and GAEC (500 words maximum)

LINK are disappointed that GAEC is not doing more to meet Scottish Government and EU objectives for biodiversity, water, mitigating climate change and landscape. Basic farm payments must achieve more than meeting existing regulation and cross compliance is an important tool in creating a more sustainable countryside. This is not gold-plating but preventing further decline of Scotland's environment and landscape quality. Greening as introduced will achieve little at the start of this programme but must be seen as a direction of travel, resulting in every farmer 'acting in a greener fashion'. Therefore greening measures must be as robust as currently feasible. This is why LINK is seeking a suite of equivalence measures and we would strongly urge the Scottish Government to commit resources to map landscape features and habitats at farm level within the life of this programme (and ideally by 2017). We note the data already recorded on Scottish [Land Information Search](#) and happy to support with appropriate existing datasets stored in GIS format from member organisations.

Question 42: What level of VCS do you think should go to a future beef scheme?

- a) 0%;
- b) 2%
- c) 4%
- d) 6%
- e) 8%
- f) No view

Question 43 : The Scottish Government thinks that future VCS should be allocated to give 3 x the rate for the first 10 calves, 2 x the rate for calves 11-50 and 1 x rate for more than 50 calves. Do you agree?

- a) Yes;
- b) No should increase the front loading so that small producers (1-10 calves) benefit more;
- c) No should decrease the front loading so that medium sized herds benefit more;
- d) No view

Question 44: Should any future coupled support scheme for beef allow payments on beef calves from dairy cows i.e. 50+% beef genetics?

- a) Yes agree should focus coupled support on 50+% beef calves;
- b) Yes but only if the 50+% calves make it to slaughter or some other criteria to ensure proper use;
- c) No because it would dilute payments to "beef" calves when we need to strengthen them and economic output from dairy relatively high;
- d) No because it would complicate the market and devalue the "Scotch beef" brand;
- e) Other;
- f) No view

Question 45: Do you agree that we should not consider coupled support for lambs until there is a statutory database in place that identifies individual animals?

- a) Yes;
- b) No;
- c) No view.

Question 46: If a coupled support scheme for sheep was introduced what proportion of VCS funding should be used?

- a) 2% VCS for all sheep and 6% VCS for beef;
- b) 3% VCS for all sheep and 5% for beef;
- c) 2% VCS for hill sheep and 6% VCS for beef;
- d) 3% VCS for hill sheep and 5% for beef;
- e) Use all 8% VCS for beef;
- f) No view.

Question 47 – Should we explore with the other UK regions whether it could be possible to use more than 8% of the Scottish ceiling for voluntary coupled support?

- a) Yes;
- b) No;
- c) No view.

Question 48: Should Scotland use the Redistributive Payment option?

- a) Yes;
- b) No;
- c) No view.

Question 49: The Scottish Government proposes to pay Young Farmer top ups on the first 54 ha using Option (1) (top up payments calculated at 25% of average entitlement value). Do you agree?

- a) Yes
- b) No, should use Option 2 ;
- c) No, should use Option 3 ;
- d) No, should use Option 4;
- e) No view.

Question 50: Given that the majority of Scotland's small farms are grassland and livestock based, the Scottish Government does not propose introducing a Small Farmers Scheme. Do you agree?

- a) Yes;
- b) No;
- c) No view.

Question 51: The Scottish Government does not propose to use the Pillar 1 ANC option and will continue to provide support for Less Favoured Areas under Pillar 2. Do you agree?

- a) Yes;
- b) No;
- c) No view.

Question 52: In Year 1, the Scottish Government proposes to use the National Reserve to help existing new entrants from Day 1. Do you agree?

- a) Yes;
- b) No;
- c) No view.

Question 53: The Scottish Government intends to ensure that future new entrants are able to access the National Reserve for entitlements and may use the option to perform further top slices to ensure there are adequate funds for this purpose. Do you agree?

- a) Yes;

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- b) No;
- c) No view.

Question 54: Please score the following aspects of the proposed package for Basic Payments (1= Strong agreement that feature should be in final package, 2 = Agreement, 3 = Weak agreement and 4 = Disagree that feature should be in final package).

- a) Two Payment Regions based on land type (Region 1 = arable (including temporary grass) and permanent grass and Region 2 = rough grazing); **2**
- b) Regional budgets set to give a Basic Payment plus Greening payment combined rate in rough grazing Region 2 of €20-25/ha (any VCS would be in addition to this) and the combined Basic Payment and Greening rate in arable/permanent grassland Region 1 of €200-250/ha; **4**
- c) Area based payments phased in by 2019 using standard internal convergence mechanism; **4**
- d) Minimum activity requirement of around 0.05LU/ha with derogations; **4**
- e) National reserve used for force majeure and new entrants; **2**
- f) 8% VCS to 75+% beef sector; **4**
- g) Young Farmer Payments made on basis of 25% of average entitlement value; **3**
- h) No Small Farmer Scheme; **1**
- i) No Pillar 1 ANC payments; **4**

Question 55: Please score the following possible aspects of the future package (1= Strong agreement that feature should be in final package, 2 = Agreement, 3 = Weak agreement and 4= Disagree that feature should be in final package).

- a) Regionalised redistributive payments across Scotland; **2**
- b) Greening comprising Europe's 3 standard Greening measures; **3**
- c) Greening comprising equivalence options; **1**

Question 56: Final comment box for comments on proposed package as a whole (500 words maximum).

Within the details of this consultation the particular aspects we would urge in particular the adoption of:

- *moving to area rather than historic payments by 2017*
- *more rigorous definitions for greening & cross compliance requirements*
- *commitment to greening equivalence measures*
- *access and mapping of all environmental and landscape features within the life of the programme (and ideally by 2017)*

Concerns include:

- *25€ per hectare being too low for rough grazing*
- *Delay in reforming LFASS & moving to ANC*
- *No recognition of HNV land*
- *The weakness of GAEC & Greening*

This response was compiled on behalf of LINK's Agriculture Taskforce and is supported by the following LINK members:

- Archaeology Scotland
- Butterfly Conservation Scotland
- Plantlife Scotland
- Ramblers Scotland
- RSPB Scotland
- Scottish Wildlife Trust
- Woodland Trust Scotland

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