

Stewart Stevenson
Minister for the Environment
Scottish Government
St Andrews House
Regent Road
Edinburgh EH1 3DG

30 May 2012

Dear Minister

Thank you for the recent opportunity which we had for discussion with you. I am writing to reiterate the main issues covered with you then. As Mr Lochhead was not able to join us, and as LINK members would welcome an opportunity to meet with him, your support in arranging this for our September meeting would be appreciated. I am aware that this may necessitate a change to the date currently scheduled; if so, we will be happy to work with officials to find a suitable alternative that will allow Mr Lochhead's involvement.

LINK remains keen to see progress in Scotland on the Active Travel agenda, for health as well as carbon emissions reduction reasons. We believe a stakeholder group would advance thinking effectively; we note your suggestion to contact officials who will be ready to take points, and we will pursue this, with other interests, on walking and cycling issues.

Given Government's commitment to the Land Use Strategy, we anticipate that the principles will be mainstreamed in discussions across Government in relation to use of land in Scotland; in a number of the policy discussions in which LINK is involved, we have been struck by the lack of cross-referencing with LUS. We are pleased to note that you and your officials believe this process is beginning to happen, for example, in relation to CAP reform and NPF3. Given our longstanding involvement with the issue, we will be watching for progress. Meantime we look forward to the June event and report and will take up your invitation to come back to you then, if we feel there continue to be gaps, which a stakeholder group, for example, could better address.

LINK has engaged proactively in the consultation on WEAG despite not having a place on the group. We are keen to see a swift response from yourself, to the report when it reaches you, to help to progress from thinking to implementation. We support a plan-led approach, to deliver a range of benefits in terms of important species and habitats, including higher proportion of native trees, more natural regeneration. We will contact you again as WEAG reports.

Delivering public benefits through the reformed CAP – There is a real opportunity to increase support for HNV farming and crofting on a 'public goods led' basis which can deliver ecosystem approaches. The move to regionalised payments - and how this is implemented in Scotland – is a key opportunity to increase support for such economically vulnerable but environmentally important farming systems. Like you, we acknowledge the need for some flexibility within the CAP to address Scottish concerns, for example, on the greening proposals and the definition of permanent grassland to encompass heathland. . We discussed the role of EFAs in delivering both biodiversity and ecosystem service objectives, and the risk that under current proposals they will do neither. We recommended an outcome-focussed approach, with necessary measures in place to ensure that the 7% of agricultural land designated as EFAs really does deliver public goods. . We believe the EFA requirement should apply on all farmland, not just on arable land as currently proposed, and that a developing a menu of options for what constitutes EFA could be helpful. We urge Government to make SRDP schemes

more accessible, not necessarily simpler or fewer, recognising that multiple options are critical to delivery of the overall objectives here. We made the case that Scotland must invest in having the necessary mapping available to inform judgements; also that an advisory system underpinning Pillars 1 and 2 is badly needed to guarantee the desired outcomes through better design at the outset; Government should respond to the real call from the sector for more advice. We want Government to maintain cross-compliance to underpin policy and payments and to ensure that use of the now smaller pot of funding will be as effective as we can make it here in Scotland. LINK would support a shift of funds to Pillar 2 and believes any movement in the opposite direction would work against achieving public good outcomes from SRDP support. We share your view that we will need more not less monitoring and evaluation, going forward

Thank you for your time on 9 May. We look forward to further discussions with you on these key issues.

Yours sincerely,

Deborah Long
Chair