



The Rt Hon Richard Lochhead MSP  
Cabinet Secretary for Rural Affairs and the Environment  
Scottish Government  
St Andrew's House  
EDINBURGH EH1 3DG

2 May 2013

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Dear Cabinet Secretary

### Follow-up to Scottish Environment LINK meeting on 25<sup>th</sup> April

Thank you for taking the time to meet with Scottish Environment LINK members last week, especially given the sad news which you had just received. We promised to write to summarise our key points and this is the purpose of this letter.

We were encouraged by many of the things you said at the recent CAP Moving Forward Conference and your re-assertion of some key points at our meeting including: the need to balance more support in Pillar I of the CAP towards High Nature Value farming; your commitment not to move funds from Pillar II to Pillar I; the importance you place on securing a well-funded Pillar II to support rural development ; and, your determination to reduce the carbon footprint of farming and secure greater public benefit from the CAP. We were especially pleased to hear you say that you want to see '*...every farmer acting in a greener way than before*'. Your proposal for a future event to broaden the discussion across sectors on the need for a greener CAP was very welcome. We will develop some ideas on this and submit them to your officials shortly and we offer to help in whatever way we can to bring such an event to fruition.

During the meeting, we made the following points:

1. **The need for a clear vision for the future** – setting out a clear vision for the future of farming and the environment in Scotland will help to give a clear focus for the decisions that need to be taken on CAP implementation. We encourage you to use every opportunity at your disposal to set out your intentions in the way you expressed them to us; the above mentioned event would be helpful in this regard.
2. **Moving to regionalised payments in Pillar I** – we support the proposed move to regional payments and see this as an opportunity to re-balance Pillar I support more towards extensive livestock production in areas of High Nature Value. The modelling work being undertaken must include an evaluation of the likely economic, social and environmental

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impacts of different options. We encourage your officials to develop a set of environmental criteria against which impacts can be judged e.g. impacts on designated sites, priority species and habitats and landscape character.

3. **Implementation and enforcement of cross compliance** – cross compliance is an important policy tool to encourage compliance with environmental and other legislation and must be effectively implemented and enforced. Greater effort needs to be made to improve guidance and advice to farmers to help them understand and comply with regulatory requirements.
4. **Pillar I Green Payment** – we support the introduction of a green payment in Pillar I but believe EU rules will make it difficult to use this payment in Scotland to maximum environmental effect across all agriculture sectors. There may be scope to develop an alternative model that would be deemed ‘equivalent’ to the Commission’s proposals and we offer to work with your officials to consider what this might look like. We see the green payment as only one component in a package of measures required to achieve a greener CAP overall.
5. **Modulation from Pillar I to Pillar II** – we support your efforts to secure a better allocation of EU funds for Pillar II but consider the funds available will fall short of what is required. We urge you therefore to use modulation to the maximum extent (currently proposed at 15%) to shift funds from Pillar I to Pillar II where they can be used in a targeted way to achieve environmental outcomes. Many environmental activities that could be funded this way would also deliver socio-economic benefits.
6. **Improving the next SRDP** – many of the environmental challenges we face (loss of biodiversity, diffuse water pollution, GHG emissions and decline in our landscape and cultural heritage) can only be addressed by securing appropriate land management. The agri-environment-climate measure is one of the few measures with the scope to support such management. A significant increase in funding for this measure, alongside support for organic farming and some forestry measures, within the next SRDP is necessary if the Government’s own environmental obligation and targets are to be met. At least 50% of the budget should be allocated to these measures. We also support:
  - Better prioritisation and targeting in the next Programme to ensure value for money and to focus limited funds
  - Focusing funds on the delivery of public goods and not on funding activities which may have happened anyway or for which there are alternative sources of EU or domestic funding
  - A ‘facilitation’ pot of funds to encourage and support landscape scale land management and collaborative action
  - A significant increase in expenditure on the provision of advice to farmers and land managers to improve delivery and outcomes.

Thank you once again for taking the time to meet us. We found the meeting very useful and would welcome the opportunity to meet with you again once EU negotiations are further advanced and as decisions on implementation progress. If we may, we will contact your office to seek a further meeting at an appropriate point.

Yours sincerely

A handwritten signature in black ink that reads "Deborah Long". The signature is written in a cursive style with a large, prominent 'D' and 'L'.

Deborah Long  
LINK Chair  
On behalf of members of LINK's Agriculture Task Force