

Consultation Response

Scottish Environment LINK Response to the First Stage Review of The Scotland Rural Development Programme (SRDP)

Introduction

LINK welcomes the opportunity to input into this review. There have been some problems with the administration of the programme, in particular, the application process for Rural Priorities. We therefore support an assessment of the programme to look at the opportunities for improvements. We feel, however, that a wide-ranging review is perhaps premature at this early stage of implementation. There is currently no justification for changing the aims and priorities agreed by a wide range of stakeholders. The SRDP is the main delivery mechanism for a wide range of Scotland's environmental commitments. It is therefore of utmost importance that its ability to help reach these commitments is not compromised.

Background

LINK's position on wider CAP reform is laid out in the document Beyond the CAP¹. We believe that all land management funding should be directed towards the provision of public goods. This is the only way in which continued funding to the land management sector can be justified long-term. Scotland currently receives the lowest level of Rural Development support per hectare of farmed land out of any EU country. Rural Development makes up a small proportion of total funding to agriculture and LFASS makes up the largest part of axis 2, the part supposedly dedicated to improving the environment. A thorough review of the SRDP should therefore examine carefully whether LFASS is meeting its aim according to the rural development regulation's definition of what axis 2 is for. The current review seems to concentrate on Rural Development Contracts which make up a fairly small proportion of the total rural development funding.

The lower tier of Rural Development Contracts – Land Managers Options, is by itself insufficient to meet the aims of the European Rural Development Regulation or the SRDP itself. While some of the options are good, the lack of targeting and completely free choice afforded, mean that LMOs cannot address local issues. In the last round of applications, only 14% of the funding went to agri-environment.

Rural Priorities, while complicated, have the mechanisms in place to target funding towards the provision of public goods. The integration of agri-environment, forestry, competitiveness and community schemes represents an ambitious step forward and could potentially help move towards a more integrated, holistic approach to land management - incorporating the whole systems rather than individual elements of the system. Scottish Government have recognised the importance of this approach and have commissioned the Rural Land Use Review to look into how the different competing land uses can be best integrated to achieve optimum results.

There are however, ways in which both RPs and LMOs should be improved to ensure that small-scale agri-environment management does not fall between the two schemes and we have made suggestions as to how this could be achieved as part of this response.

¹ <http://www.scotlink.org/pdf/LINKBeyond-the-CAPReportSept08.pdf>

Answers to specific questions

1. Are the priorities and objectives set out in the Strategy document underlying the SRDP, and in the SRDP itself, still the appropriate ones for rural Scotland? If not, how might they be changed?

LINK was represented on the stakeholder groups which agreed the priorities. We believe that all of these are still important for rural Scotland. The priorities are partially determined by the requirements of the RDR and partially by Scotland's European and international obligations, they therefore cannot be changed without good reason. The need to meet environmental commitments is increasingly urgent. It is unlikely that we shall now meet the 2010 biodiversity commitment. We are also worryingly far from meeting the commitment to get all water bodies into good ecological condition by 2015. Scotland also has ambitious greenhouse gas emission reduction targets and action will need to be taken by the land management sector. If we do not address these issues now, we will decrease our ability to be able to do so in the future. The programme should therefore ensure that none of the measures are working against the environmental commitments and that the funding for environmental options is increased if possible and certainly not reduced.

2. How can the SRDP assist in meeting the challenges of the economic downturn?

While we must consider the implications of the economic downturn for all policy areas, the SRDP has a limited ability to address the national and global economic problems currently being faced. The economic downturn does not lessen the importance of tackling the environmental problems faced in Scotland nor the environmental commitments Scotland is signed up to. Funds should therefore not be cut from axes 2 or 3 and put into axis 1 in under the simplistic assumption that only axis 1 stimulates economic activity. LINK believes that some axis 2 and axis 3 measures can assist in meeting the challenges of the economic downturn at least as well, if not better than axis 1 measures. A recent SNH report² showed that activities dependent on the natural environment have an estimated output of £17.2 billion GVA a year in Scotland, an output which supports some 242,000 jobs (14% of all full time jobs in Scotland). Managing the environment stimulates economic activity but allowing it to be damaged will result in large economic losses. The Stern review³ indicated the danger posed by ignoring climate change – ignoring it is likely to result in the loss of between 5-20% of global GDP each year, now and forever. More recently, its biodiversity equivalent, the interim report of TEEB⁴ has estimated that our current rate of biodiversity loss, we lose ecosystem services every year worth 50bn€ now and forever. "Green jobs" are an important part of the Scottish Government's economic recovery plan. These should be in the land management sector as well as in renewable energy.

² SNH (2008) Valuing our Environment: The Economic Impact of Scotland's Natural Environment

³ Stern review on the economics of climate change
http://www.hm-treasury.gov.uk/sternreview_index.htm

⁴ The Economics of Ecosystems and Biodiversity (2008)
http://ec.europa.eu/environment/nature/biodiversity/economics/pdf/teeb_report.pdf

3. In light of the responses to 1 and 2 above, what are the implications for the balance between the Axes within the Programme, and should the Scottish Government consider changes to the measures and/or delivery mechanisms?

LINK believes that the balance between the axes should not be altered. Scotland's spend on targeted agri-environment is already unacceptably low and that any reduction of this would show that the Scottish Government is not serious about meeting our environmental commitments. While the aims of axis 1 are important, the low levels of funding going towards environmental work would make any transfer of funds to this unacceptable. We would therefore urge no change in the balance at the current time.

LINK is also extremely concerned by the suggestions that funds should be transferred from RPs to LMOs. We believe that LMOs are not sufficient to meet our environmental commitments. Greatly increased funding and coverage, as well as a mechanism that encouraged sufficient uptake of agri-environment options, would be needed before they provided sufficient environmental benefits. With the low levels of funding available, it is necessary to pick and chose between applications and locations and RPs are the only mechanism currently able to do this.

LINK has a number of suggestions for simple changes to the delivery of the programme which should improve its performance. These are listed below:

- Some programme priorities are insufficiently covered by the options. A group should be convened to agree where there are gaps and submit suggestions to Europe. We have included comments on the areas which are not well covered.
- Invertebrates are not well served by priorities, packages or measures, although the adoption of specific grazing plans can benefit a large number of priority species. A specific example is provided by bumblebees which represent an invertebrate group with opportunities for SRDP objectives of biodiversity delivery (3 UK BAP species in Scotland, one of which is listed under the Species Action Framework) and sustainable economic delivery (through wild pollination services). A valuable approach would incorporate a new regional priority (e.g. pollination services with regard to axis 1 and 2) and design new packages (emphasising semi-natural and pollen and nectar rich habitats) to support pollination services and deliver direct benefits to priority species (axis 2). Without a priority-linked package and associated biologically relevant measures, it becomes necessary to cobble together potential benefits using measures from a range of priorities and packages. Although in principle this should 'add value' to an application, in practice it seems to unfairly dilute and weaken an application.
- Reinstate the Archaeological management option which was included in the original LMC scheme. Without this, there is little incentive for land managers to provide positive management for archaeological features.
- In terms of assessing smaller applications, there are potentially prohibitive demands on small organisations that have the necessary specialist knowledge and advice. Improvements in knowledge transfer are needed, that would be aided by some form of funding support e.g. for staff time, skills development and site visits. This will ensure that the best quality advice is made accessible. A fuller understanding of the advice will lead to improved adoption and consistency among case officers and RPACs.
- An example of successful engagement with the programme is provided by Butterfly Conservation Scotland. Funding from SNH and FCS has allowed them to assist with applications for management for Marsh Fritillary in Argyll. 20

applications have so far been submitted and 7 have already been accepted. The targeted specialist advice provided has allowed land managers to adopt grazing plans, specifically targeted to benefit this species.

- There are also issues with the access options. While uptake through LMOs has been good, there is concern over value for money and whether the funding has delivered better access opportunities where they are needed. Some of the work appears to have been of minimal benefit to the public - though it is hard to tell, as information on locations is hard to come by. Uptake of access options through RPs has so far been low though the removal of the £500 limit should encourage more applicants. The 75% funding limit has also tended to discourage applications.
- Statements of Intent could be made simpler in line with the original idea that a land manager could submit one themselves.
- Case Officers should give consistent advice (further training) while allowing regional (or even local) flexibility.
- Case officers sometimes need to take on more of an advisory role particularly in areas where few applications are being submitted. This is particularly important for protected sites or species in very localised areas.
- Examine the balance of funding between the different regions. The Western Isles have up until now, received a very small proportion of RP funding. It may be that more advice and encouragement (as described above) is needed in this area.
- Recognise the importance of small applications which may in some cases provide large environmental benefits. It may be possible to reduce the administrative burden for small simple applications. Many of the assessment criteria do not make sense for applications aimed at biodiversity management. Where small applications are recommended by experts and located in an area targeted for that particular priority, there should be means of bypassing some of the application stages.
- The packages should help to direct applicants particularly if they don't know their way around the programme well. Links should be included in the text or next to each regional priority so that applicants don't have to look through a long list of priorities. The Supporting Biodiversity package should be simplified and broken down into its component parts. This will require the introduction of new packages covering a range of species.
- Effective monitoring of the biological effects of the programme is essential if we are to justify the public money going to land managers. A monitoring programme examining the effects of Rural Priorities across Scotland with a comparison to a baseline situation should be established as soon as possible. Monitoring of LMOs and LFASS would also help to prove whether they have positive impacts on the environment.
- Monitoring of the other public goods provided by the programme should also be carried out. There is, for example an ongoing issue over making information available on where the access opportunities are. Access Officers are now notified but there needs to be a mechanism for making users aware of this information.
- We welcome the provision of facts and figures on the applications accepted so far. These should be further broken down to the priorities and options being accepted in the different regions.

The following organisations represented on LINK's Agriculture Task Force are signed up to this response:

Archaeology Scotland
Buglife – The Invertebrate Conservation Trust
Bumblebee Conservation Trust
Butterfly Conservation Scotland
National Trust for Scotland
Plantlife Scotland
Ramblers Scotland
RSPB Scotland
Scottish Wildlife Trust
Woodland Trust Scotland

For further information on this subject contact:

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Scottish Environment LINK is the forum for Scotland's voluntary environment organisations - 36 member bodies representing a spectrum of environmental and associated cultural heritage interests with the common goal of contributing to a more environmentally sustainable society. LINK provides a forum and network for its members; and assists communication between members, government and civic society. Further information on LINK is available at www.scotlink.org

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