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Richard Lochhead, MSP
Cabinet Secretary for Rural Affairs and the Environment
The Scottish Executive
St Andrew's House
EDINBURGH
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7th August 2007


Dear Cabinet Secretary

Scottish Environment LINK was very disappointed to learn of the decision by the Agriculture Council on 16th July 2007 to move towards a zero percent set-aside rate for the coming year, in the absence of any environmental evaluation of the current scheme or alternatives.

We accept that the rationale for set-aside as a means for controlling production disappeared following decoupling. Future agricultural policy should, instead, deliver integrated environmental and agricultural progress through an ecological approach across the whole farmed landscape. However, there is strong evidence that set-aside has significant environmental benefits that will be lost if measures are not put in place to maintain them. Many of these benefits could be retained through the use of cross-compliance and agri-environment measures if, as originally intended, there was to be an orderly transition through the Health Check process in 2008.

The current proposal pre-empts the Health Check and could have serious implications through the loss of permanent set-aside that is currently buffering water courses and semi-natural habitats, protecting archaeology and enhancing landscapes; and rotational set-aside which is providing an important food source for farmland bird populations.

As a matter of urgency, mitigation measures should be included in Scottish cross-compliance rules this coming year, to avoid wholesale loss of the 68,000 hectares that benefited from set-aside management last year, and the associated environmental benefits derived from that. In addition, resources for agri-environment will be needed to deliver some of the benefits of set-aside, and this could be achieved through the transfer of the equivalent funding currently allocated for set-aside to Pillar 2 of the CAP.

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Set-aside plays an important role for farmland wildlife in Scotland, but also across the EU. Its unmitigated loss would seriously impede efforts to meet the EU Gothenburg target of halting biodiversity decline by 2010, as well as future Water Framework Directive targets for achieving good ecological status in water bodies. We therefore urge you to ensure effective mitigation measures are in place in Scotland, and also use your influence with the UK government and the European Commission to deliver similar measures across the UK and Europe.

Yours sincerely

Mandy Gloyer
Convenor, Scottish Environment LINK Agriculture Taskforce