

Response to “Future Strategy for Scottish Agriculture – final report by the Scottish Government’s Agriculture Champions”

Scottish Environment LINK welcomes the publication of this report as a contribution to the ongoing debate around the future of rural payments in Scotland¹. We also welcome the call for a ‘civic conversation’ and have expressed our willingness to participate in such a conversation from the outset of this process.

In summary:

- LINK members have supported the need and worked to enable cross-sectoral dialogue with the input of environmental charities and civic voices, as well as other partners.
 - In June 2017, LINK and SLE co-hosted a Chatham House rule workshop on the future of rural support; key conclusions were captured in a report.
 - Earlier in 2018, LINK commissioned Survation to conduct polling of 1,000 Scots to identify public views on future support payments², with **77% of Scots indicating that they want farming to deliver for our environment and climate**.
 - At the same time **over 50 organisations supported a letter coordinated by LINK and NFUS in support of a just transition to carbon neutral farming by 2050**³.
- LINK supports the report’s conclusions on the need for an urgent mindset change, particularly with respect to support for generating public value on behalf of society. The acknowledgement that “no change is not an option” should prompt Scottish Government to move forward and develop specific policy proposals. Other countries in the UK, such as England and Wales, have published views about the future of rural payments. Scotland cannot afford to lag behind.
- Despite the emphasis placed in the report regarding a mindset change, it fails to offer a clear policy framework to deliver the change aspired. We are disappointed that the report’s recommendations are still developed in way which puts ‘production efficiency’ in one corner and ‘public value’ in another. The rationale for retaining a level of income support is unclear as well as the way in which it is linked to ‘production efficiency’ and ‘public value’.
- In addition, some ideas presented do not seem to match the aspirations expressed in the report. For example, the report indicates that schemes such as LFASS, Sheep scheme and Beef Efficiency should be retained and built on to support high nature value (HNV) farming. In our view, however, these schemes are not well placed to deliver for HNV farming.
- With respect to the proposals to cap overall support, while there is logic for capping income support payments, this is not the case for payments towards environmental/public goods given the different nature of these.
- We are also concerned regarding references to “relaxation in the planning system”. We agree that rural housing is an issue and that we also need a regime that helps farm diversification and business development. However, this cannot happen at the expense of the natural environment. We would recommend that rather than allowing things to happen in a piecemeal manner or creating an overly permissive regime, that a more strategic look at rural needs is

¹ LINK member views are captured here (April 2017): <http://www.scotlink.org/public-documents/link-future-of-farming-and-rural-land-use-in-scotland/>

² Survation poll results: <http://www.scotlink.org/public-documents/77-of-scots-want-farming-to-deliver-for-our-environment-and-climate-poll-suggests/>

³ More information about the letter: <http://www.scotlink.org/public-documents/scottish-government-must-drive-just-transition-towards-carbon-neutral-farming-urge-50-ngos-farmers-rural-groups-and-academics/>

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required. There is a clear link here with commitments under the Land Use Strategy and requirement of regional land use plans.

- We also note that the report's 2006 predecessor 'A Forward Strategy for Agriculture' shares much of the same analysis. It would have been helpful to have started by reviewing what has changed and what hasn't since then.
- It would have also been useful for the report to have explicitly reflected the conclusions and recommendations of the paper by the Common Agricultural Policy (CAP) Greening Group on developing principles for greening beyond the context of the current CAP⁴. The paper provides clear recommendations in terms of a vision for farming, funding as well as suggestions for a framework for future policy and support mechanisms.
- From a policy context point of view, we are disappointed that there is no reference to UN SDGs or Scottish ambitions for a Good Food Nation Bill. It would have been useful to compare the report's recommendations against those overarching goals
- Looking ahead, LINK looks forward to the recommendations of the National Council of Rural Advisors and hopes that responses to the conclusions of the Agriculture Champions report will be reflected there.

Specific comments on analysis and proposals:

- We welcome the commitment for a short **transition period** in which payments are capped, and the money released is used for developing and testing new approaches. It is important to note that that if we are committed to transformational change, the path dependency of the current subsidy regime needs to be broken.
- We question the utility or fairness of continuing **direct payments and LFASS** as a land-based 'income support' without any concomitant expectation of delivering and being seen to deliver public goods. There was a clear majority in our recent polling that all payments should be dependent on delivering wider public benefits. We also question the value of headage schemes and propose that an independent evaluation of the efficacy of the current schemes should be undertaken.
- We agree that some farmers and crofters with poorly-performing businesses (the long tail described in the 2006 report) are not taking up offers of **training and advice**. However, we doubt the efficacy of the proposed online 'mindset change' tool in changing their minds.
- We support farm advice being reviewed and call for increased funding and big improvements on what's on offer. We believe there is a case for making income payments conditional on recipients accepting and embracing other new schemes.
- We welcome the recognition that some farmers should be helped to leave the profession, while others should be helped to enter it: and we would add to that the importance of diversity in new entrants – we need more women, more new Scots and more people with no background in farming to bring their talents.
- We welcome the emphasis on co-operation, benchmarking and continuing professional development and the hint that future support may be dependent on farmers participating in these structures and processes. The report could have gone further in recommending producer organisations as a vehicle for effective co-operation, or something similar to the 'Economic and environmental interest groups' established in France following the law in agroecology.
- We welcome the emphasis on increasing the advisory service, and we agree that advisors themselves need training. However, we would argue that the training they need is about **agroecology** – bringing production and environment together.
- We welcome the proposals for a regional approach to integrated land use planning, and would argue for this same integrated approach to be adopted at farm and catchment scale. The 2006

⁴ The final paper can be accessed here: <https://beta.gov.scot/publications/cap-greening-group-discussion-paper/>. The group was chaired by Professor Russel Griggs and was established at the request of Scottish Ministers in February 2017.

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strategy introduced Land Management Contracts and this approach should be considered afresh.

- We note the reference to 'pressure from lobby groups' that will reduce the availability of agrochemicals and question whether this perception fits with the new mindset supported by the report. We highlight that recent proposals for restrictions of some neonicotinoids stem from recent reports from the European Food Safety Authority.
- We agree that the current classification in the inventory which separates agriculture from 'land use, land use change and forestry' is not able to reflect positive on-farm activities such as woodlands, agroforestry and renewable energy generation. However, it is very clear that agriculture is a key sector that will be both affected by climate change itself and which has a significant job to do to reduce its own greenhouse gas emissions. Support is needed to help the transition to **carbon neutral farming**; this was explicitly supported by 50 organisations including NFUS, crofters, members of LINK as well as academics in a recent open letter to Cabinet Secretaries Roseanna Cunningham and Fergus Ewing.

Noteworthy omissions from the report:

- **Organic farming** does not receive a mention (unlike in the 2006 strategy) – yet delivers on economic and environmental goals, attracts a price premium and sells into a market which is growing strongly in all our export destinations.
- **Agroecology** – embedding agricultural activity in an ecosystems approach – provides a useful conceptual starting-point for the new mindset which LINK believes is needed. It includes within it particular techniques such as agroforestry, an example of integrated land use which is particularly relevant to Scotland. These ideas must be part of the civic conversation.
- The report – as in the 2006 strategy – could helpfully have cited some case studies of farms showing examples of innovation and responsiveness to customers.
- There is no mention of **animal welfare**. We believe that stating that 'we have high standards of animal welfare' is an insufficient response to the issue. Public understanding of, and support for, farming depends on an honest conversation about where we could do better in caring for the animals which feed us.

This briefing is supported by:

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