

**Response to the Scottish Government's consultation on the
Scotland Rural Development Programme (SRDP)
2014 – 2020, Stage 2: Final Proposals**

**By the Scottish Environment LINK Agriculture Taskforce and
Woodland Forum**

28th February 2014



Summary

LINK welcomes the consultation and a good number of the elements of the proposed SRDP. We recognise the efforts to improve upon the current scheme. We welcome efforts to develop targeting of the Agri-Environment-Climate (AEC) scheme and the Forestry Grants Scheme to support species and habitats. We also support the Cooperation Fund and the new Advisory Scheme structure. However, there are a number of areas of concern:

- We do not believe the overall budget is sufficient. The largest share is given to LFASS which does not produce value for money as it provides very little environmental benefit.
- Proposals contain too few details in a number of places and therefore confidently supporting these measures is not possible. This is particularly the case with the AEC scheme and the assessment process.
- We see the potential of the Agri-Environment-Climate scheme but believe a minimum of £60m per year is needed to adequately realise all its objectives. Underfunding is also an issue, in our opinion, for the Cooperation Fund, the Advisory Scheme and the new Agroforestry and Tree Health grant options.
- The Forestry Grant Scheme must improve the biodiversity value of existing woodlands and ensure woodland creation enhances the environment. New woodland planting must follow the principle of "the right tree in the right place" and remains important to ensure that valuable non-woodland habitats are not damaged. The UK Forestry Standard for woodland creation on agricultural land must be applied.
- The proposals for Monitoring and Evaluation fall well below what is needed to demonstrate whether the £1.3bn being spent is good value for money, having the intended impact, and informing the development of future schemes

Introduction

Scottish Environment LINK is the forum for Scotland's voluntary environment community, with over 30 member bodies representing a broad spectrum of environmental interests with the common goal of contributing to a more environmentally sustainable society.

Its member bodies represent a wide community of environmental interest, sharing the common goal of contributing to a more sustainable society. LINK provides a forum for these organizations, enabling informed debate, assisting co-operation within the voluntary sector, and acting as a strong voice for this community in communications with decision-makers in Government and its agencies, Parliaments, the civic sector, the media and with the public.

Acting at local, national and international levels, LINK aims to ensure that the environmental community participates in the development of policy and legislation affecting Scotland.

LINK works mainly through Taskforces – groups of members working together on topics of mutual interest, exploring the issues and developing advocacy to promote sustainable development, respecting environmental limits.

LINK members welcome the opportunity to comment on this Stage 2 consultation on the next Scotland Rural Development Programme (SRDP). This response has been prepared by LINK's **Woodland Forum** and **Agriculture Task Force**. This is a paper version of the response submitted online with additional explanation behind our answers.

Response to specific questions

SECTION 4 – BUDGET FOR SRDP 2014 - 2020

Question 1

How would you rate your satisfaction with the budget as a whole?

	Very satisfied
	Quite satisfied
	Neither satisfied nor dissatisfied
	Quite dissatisfied
X	Very dissatisfied

LINK is very dissatisfied with the SRDP budget. We called for Government to use the flexibility mechanism under CAP rules to transfer the full 15% of funds from Pillar 1 to Pillar 2¹. The decision to transfer only 9.5% results in the SRDP budget being approximately £220m lower than what it could have been.

There is no clear budget line for Heritage in the proposals, and considering £9m+ was spent on this in last programme, we are concerned that Scotland's heritage will suffer. Similarly, we regret the absence of budget and proposals to enhance public access to agricultural land. This is a serious deficiency in the programme which will affect many lowland areas where intensively cropped land is adjacent or near to the places where people live and work.

We believe that the budget for the Agri-Environment- Climate (AEC) scheme is not large to meet all its objectives and Government obligations. We recommend that £60m/yr is required for AEC.

Funding on the Less Favoured Area Support Scheme (LFASS) is too high(35%). In answer to question 3 (below) we outline the rationale for this.

SECTION 5 – RURAL REGIONAL DELIVERY PARTNERSHIP FOR LAND BAED INVESTMENTS

¹ <http://www.scotlink.org/files/policy/Correspondence/LINKCAPLetCabSecDec2013.pdf>.

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Question 2

Are you broadly satisfied with the new application and assessment process for land based investments outlined in section 5?

	Very satisfied
	Quite satisfied
	Neither satisfied nor dissatisfied
X	Quite dissatisfied
	Very dissatisfied

The SRDP assessment process must be designed to select and accept applications which aim to provide the greatest environmental benefit. The process must include agreed selection criteria, agreed prioritisation at a regional level, and a transparent scoring system. **Application and assessment process must relate to the quality of agreements being approved rather than the ease of access.**

LINK is concerned that the applications are assessed by the most qualified staff. For example, we would like to see heritage specialists from Local Authorities included in this process.

We are concerned with the proposals for application limits, i.e. a single application per applicant for each scheme per year. This will be overly restrictive to land managers who have more than one significant holding but one farm code. Land managers with large areas of land outside designated sites and with more than one holding will, for example, only be allowed to apply for once per year to the Agri-Environment-Climate scheme even if they have the capacity to submit a number of high quality applications. We believe that targeting and improved scoring of applications should ensure that the best applications are approved, irrespective of who makes those applications. The application and assessment process shouldn't be about spreading the money across the farming community but about delivering the best outcomes.

SECTION 6 – FUTURE SUPPORT FOR LESS FAVOURED AREAS (LFASS)

Question 3

Should support for farmers operating in constrained areas be continued through the SRDP?

	Yes
	No
X	Other

LINK is broadly supportive of the rationale behind support for farmers in constrained areas, but has deep concerns that the current LFASS is poor value for money and out of place in Pillar 2. LFASS does not require recipients to meet environmental conditions. The design of the LFASS successor presents the opportunity to ensure that it is more fit for purpose through targeting, and offering support to areas and farmers with most need whilst delivering demonstrable environmental benefits.

SECTION 7 – NEW ENTRANTS SCHEME

Question 4

How would you rate your satisfaction with the proposals for the New Entrants Scheme?

	Very satisfied
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	Quite satisfied
X	Neither satisfied nor dissatisfied
	Quite dissatisfied
	Very dissatisfied

LINK recommends that the New Entrants Scheme ensures that beneficiaries are guided towards environmentally sustainable businesses.

SECTION 8 – CROFTING & SMALL FARM SUPPORT SCHEME

Question 5

Should a scheme be expanded to provide capital support to small farms opinion.

X	Yes
	No
	No opinion

Question 6

Is a 3 to 50 hectare range appropriate for defining a small land holding?

	Yes
X	No
	No opinion

We question this range because of evidence from the Soil Association Scotland (a LINK member) who believes a limit of 2 to 50 ha would be a more appropriate range to define small land holdings. A number of their producer and grower licensees are between 2 and 3 ha in size, and would benefit from having access to the Crofting and Small Farm Support Scheme.

Question 7

Do you agree with the proposal for grants of £500 to be available to assist the establishment of Grazings Committees?

X	Yes
	No
	No opinion

Question 8

How would you rate your broad satisfaction with the proposals for the Crofters and Smallholders Scheme?

	Very satisfied
	Quite satisfied
X	Neither satisfied nor dissatisfied
	Quite dissatisfied
	Very dissatisfied

SECTION 9 – AGRI-ENVIRONMENT-CLIMATE SCHEME

Question 9

How would you rate your broad satisfaction with the proposal for the Agri-Environment-Climate Scheme?

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	Very satisfied
	Quite satisfied
	Neither satisfied nor dissatisfied
X	Quite dissatisfied
	Very dissatisfied

LINK finds the proposals short on detail for the AEC scheme and therefore difficult to analyse and be confident of the likely outcomes of the scheme. Option design, targeting, option prioritisation, and scoring and assessment of applications all need more information.

As already stated in answer to Question 1, we believe the budget for the AEC scheme is too small especially with the scope of the scheme being broadened in the new SRDP to meet the objectives for climate change, water quality and flooding. We believe that a minimum of £60m per year is needed to adequately meet the objectives and aims of this scheme.

We welcome the greater focus on targeting scheme options. We believe, if well designed, it will result in money being spent where it is needed.

SECTION 10 – FORESTRY GRANT SCHEME

Question 10

It is proposed to support forestry under six main areas as outlined below. Please identify whether you agree with these broad areas.

	Yes, should be included	No, should not be included	No opinion
Woodland Creation	X		
Agroforestry	X		
Tree Health	X		
Woodland Improvement Grant	X		
Process and marketing	X		
Sustainable Management of Forests	X		

On the issue of both the new Agroforestry and Tree Health options, they are very much welcomed, but there is a concern that new options have been introduced within a zero-sum budget without any additional funding, which means that any grants made for either of these worthwhile objectives will be reducing the amount available for the creation or maintenance of new woodlands.

Question 11

We propose nine woodland creation options with support through standard costs. Should these be included?

	Yes, should be included	No, should not be included	No opinion
Conifer		X	
Diverse Conifer	X		
Broadleaves	X		
Native Scots pine	X		
Native Broadleaved - W4	-	-	-
Native Broadleaved - Other	X		

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Native low density	X		
Small or Farm wood	X		
Northern and Western Isles	X		

In all woodland creation – including productive forestry - the principle of both species and genetic diversity should be upheld, not just to assist natural biodiversity, but also to build better resilience from the risks of tree disease. Therefore we are recommending that diverse conifer should be promoted over monoculture conifer at all times.

We warmly welcome the new “Native low density” option as contributing to the creation of valuable habitats such as montane scrub.

Although we do support the “Small or Farm wood” option we do highlight the absence of a compliance standard, such as the UK Forestry Standard for new woodland on agricultural land.

Question 12

Are there any other woodland types that should be supported? If yes, please specify

X	Yes
	No

We do question why the NVC W4 (Downy Birch and Purple Moor Grass) habitat has been highlighted for its own category of support. Planting “on upland shallow peaty soils” like this could mean that valuable peatland habitats might be inappropriately planted rather than restored. An alternative option might be to create grant options for each of the UKBAP native woodland priority habitats; Upland Oakwood; Lowland Beech and Yew Woodland; Upland Mixed Ashwoods; Wet Woodland; Lowland Mixed Deciduous Woodland; and Upland Birchwoods. Equally, a single option for all ‘Native Broadleaves’ would ensure that all NVC types and UKBAP habitats are covered, and that species such as Aspen are not left out either.

Question 13

Should the Central Scotland Green Network be allowed an “Additional Cost Contribution”? If No, please briefly explain your reasons

X	Yes
	No

Although such “special treatment” might be open to question, we do appreciate that the previous CSMW model measures to promote planting within the CSGN area have resulted in a marked improvement in creation rates across Central Scotland.

However, future iterations of the SRDP may wish to consider a similar “additional cost” scheme for any WIAT eligible application. Considerations of population size, complexity and higher costs are not unique to the CSGN area, and extending these payments across all WIAT eligible woodlands would cover a significant part of the CSGN area anyway, as well as including other areas with multiple-use demands.

Question 14

What is your preferred option for Income Foregone in SRDP 2014 - 2020?

	Option 1	Minimal change to design structure available in 2007-2013 SRDP
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X	Option 2	IF payments removed
	Option 3	IF payments to remain with calculation to exclude DP payments

Please explain your choice

We held many concerns over the way in which the Farmland Premium system operated and given that Option 2 (Removing IF payments and enhancing the maintenance rate) not only simplifies the payment period and reduces overall complexity, but also may result in potentially higher initial planting payments, we are happy for this to be considered, provided that the ecological value of any newly created woodland is assessed as worthwhile.

Question 15

Do you agree with the range of "other support" for woodland creation?

	Yes, should be included	No, should not be included	No opinion
Tree shelters and fencing	X		
Improved stock for Sitka Spruce		X	
Bracken contribution	X		
Community woodland	X		

Although deer fencing is not universally approved of, it could play a valuable role in assisting with the practicalities of restructuring and diversifying Sitka forests, and thus improving the resilience of Scotland's major forest type from disease. Since Sitka is both productive and does not need protection from deer, landowners have no incentive to consider alternative tree species when they come to restock. Allowing fencing at a standard cost would open up a variety of different species to landowners by protecting their land from grazing.

We do not believe that the improved stock for Sitka Spruce option is one which has been greatly taken up, and as it does not contribute to a wider genetic diversity within coniferous woodland, it should no longer be offered.

There are many other "stand alone standard costs" which might be considered too, such as biodiversity restoration.

Question 16

Should agroforestry be funded through the SRDP 2014 - 2020?

X	Yes
	No
	No opinion

Again, it is disappointing that no new money accompanies this new grant system, and the costs will mean a reduction in the budget for new woodland creation and maintenance, but we do welcome the new option.

Question 17

Should Tree Health be funded through the SRDP 2014 - 2020?

X	Yes
	No
	No opinion

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We warmly welcome the restocking grants, but continue to have concerns about some of the control measures which may be funded through these grants and would appreciate more detail and discussion of these through the Scottish Tree Health Advisory Group (STHAG). Again, the issue of this being a new grant scheme, but there being no additional funding, means that these grants will reduce the ability to maintain and create existing and new woodland areas.

Question 18

Do you agree with the range of Woodland Improvement Grants?

	Yes	No	No opinion
Long term forest planning – new	X		
Long term forest planning – renewal	X		
Reducing Deer impact	X		
Woodland Habitats and Species	X		
Restructuring Regeneration	X		
Non-Woodland Habitats and Species	X		
Natural regeneration	X		
Woodlands In and Around Towns	X		

We agree that all of these grant options are valuable contributions to the improvement of woodland. We particularly support the focussed support on priority habitats and species and natural regeneration; and not that the “restructuring regeneration” option could do much to promote biodiversity since forest structure is one of the key factors in the ecological value of a woodland.

Also, although not specifically mentioned, we trust that “Woodland Habitats and Species” will be able to support the key UKBAP priorities of “Traditional Orchards” as well as “Wood Pasture and Parklands.

For “Reducing Deer impact” an up-to-date Deer Management Plan, either standing alone, or as part of the agreed Forest Plan, should be compulsory for access to these grants.

We welcome the delivery of WIAT support through this new method after the discontinuation of the Forestry Challenge Funds.

A new option for managing and replacing individual trees, tree groups and woodlands in cultural landscapes would also be welcome, we know that has been raised in the past, and may be included here under “Woodland Habitats and Species” but it would be of value in supporting and protecting the veteran and other special trees that are often of significant biodiversity as well as cultural interest.

Question 19

Should these following areas be supported through the SRDP?

	Yes, should be included	No, should not be included	No opinion
Small scale premium processing sector	X		
Equipment to increase harvesting in small undermanaged woods	X		
Equipment to increase capacity for steep ground harvesting	X		

This option could bring valuable support to small enterprises, in need of assistance to realise the potential of their woodlands.

Question 20

Do you agree with the range of Sustainable Management of Forest grants?

	Yes	No	No opinion
Native woodlands	X		
Low Impact Silvicultural Systems (LISS)	X		
Public access	X		
Public access WIAT	X		
Livestock removal	X		
Woodland grazing	X		

We agree that these funds should support for the sustainable management of existing forests and woodlands of high environmental value. We endorse the need for an agreed Management or Forest Plan to access the support, since this should also take into consideration the historic landscape.

Option 3 “Public Access” targets woods where there is “a high level of public access”. We would hope that this would translate to a high level of public usage too.

Question 21

How would you rate your broad satisfaction with the proposal for the Forestry Scheme?

	Very satisfied
X	Quite satisfied
	Neither satisfied nor dissatisfied
	Quite dissatisfied
	Very dissatisfied

If you are dissatisfied please briefly outline your reasons

Scottish Environment LINK feel that there is much to be welcomed within this outline of the new SRDP, but there is still a great deal of detail to be worked out, and we look forward to working with the Scottish Government and Forestry Commission to ensure that the best outcomes are delivered for Scotland’s woods and forests from both a public and an environmental point of view.

Key to the success of this new SRDP will how focused the support for priority species and habitats can be; and we particularly welcome the new options for low density woodland, reducing deer impact, and encouraging natural regeneration in native woods.

Also, in all woodland creation – including productive forestry - the principle of both species and genetic diversity should be upheld, not just to assist natural biodiversity, but also to build better resilience from the risks of tree disease.

Our main concerns could be summarised as follows:

- It is regrettable that there is no new money for many of the new funding options (such as tree health and agro-forestry) and an already limited budget will be stretched further as a result.
- Some of the tree health measures funded may have wider wildlife and environmental implications (such as pathogen spraying) and will require more detailed explanation and discussion through STHAG.

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- It is unclear why the creation of new NVC W4 native woodlands has been singled out for specific support over all other key woodland habitats, perhaps a single “native broadleaved” option might better replace creation options 5 & 6 without prioritising or omitting any key species of habitat types.

There are also some key issues which are not covered by these proposals, and which should be considered:

- Rather than just a CSGN “additional cost” scheme, this option could be expanded to consider the additional expense to be considered in all WIAT eligible woodlands.
- Since Sitka spruce is both productive and does not generally require protection from deer, landowners have no incentive to consider alternative tree species when they come to restock felled sitka. Offering deer fencing at a standard cost in these instances would open up a variety of different tree species options to landowners.
- A new WIG option for managing and replacing individual trees, tree groups and woodlands in cultural landscapes would be of value in supporting and protecting the veteran and other special trees that are often of significant biodiversity as well as cultural interest.
- There are many other “stand alone standard costs” which might be considered too, such as biodiversity restoration.

SECTION 11 – SUPPORT FOR CO-OPERATIVE ACTION

Question 22

How would you rate your broad satisfaction with the proposals for co-operation?

	Very satisfied
X	Quite satisfied
	Neither satisfied nor dissatisfied
	Quite dissatisfied
	Very dissatisfied

We welcome the inclusion of support for cooperative action. We welcome this on the condition that the focus of this limited fund is on land-based projects and delivery of environmental outcomes, as opposed to projects aiming primarily for commercial benefit, such as collaborative marketing or food-based projects. However, **we are concerned that the budget might not be sufficient to cover the demand.**

SECTION 12 – NON-AGRICULTURAL BUSINESS SUPPORT: SMALL RURAL BUSINESS SUPPORT

Question 23

How would you rate your broad satisfaction with the proposals for Small Business Support?

	Very satisfied
X	Quite satisfied
	Neither satisfied nor dissatisfied
	Quite dissatisfied
	Very dissatisfied

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We favour support to businesses which help to support and build on Scotland’s ‘green assets’ e.g. opportunities to support eco-tourism. We recommend that applications should be assessed to prioritise those which promote sustainable rural development. No funding should be given to business proposals that might be environmentally damaging.

SECTION 13 – NON-AGRICULTURAL BUSINESS SUPPORT: FOOD & DRINK

Question 24

Do you agree with the proposal that we should continue to give significant support to the food and drink sector?

X	Yes
	No
	Other

Yes, but this should support small sustainable businesses and enterprises supporting healthy eating. This scheme should have a bottom-up rural development approach to support.

Question 25

Selection criteria such as those listed above should apply to that support?

	Yes	No	No opinion
Contribution to the Scottish Government’s overall strategies for economic development and the rural economy	-	-	-
Making a contribution to national policies for food and drink	-	-	-
Assisting the Scottish Government with its wider social policies – such as supporting or encouraging healthier eating through the provision of greater and healthier food-choices for consumers.	X		
Supporting export targets for food and drink sectors. This could include providing increased funding to projects with a strong export focus/developing new markets		X	

Question 26

Steps should be taken to streamline processes for food companies including a one stop shop for public support?

X	Yes
	No
	Other

Yes, but this should support small sustainable businesses and enterprises supporting healthy eating. We believe this scheme should encourage bottom-up rural development.

Question 27

How would you rate your broad satisfaction with the proposals for Food and Drink support?

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	Very satisfied
	Quite satisfied
X	Neither satisfied nor dissatisfied
	Quite dissatisfied
	Very dissatisfied

LINK recommends that future food and drink grants should not be subsumed into a purely business development landscape, and believe they should benefit other key policy areas including public health, the environment, communities and local enterprise.

SECTION 14 – LEADER

Question 28

How would you rate your broad satisfaction with the proposals for LEADER?

	Very satisfied
X	Quite satisfied
	Neither satisfied nor dissatisfied
	Quite dissatisfied
	Very dissatisfied

LINK members are satisfied with the proposals provided that the audit, compliance and payment issues which characterised the previous LEADER programme are fully resolved and there is consistency of resolution across all the LAGs.

LINK welcomes the Principles set out in the proposals but we are concerned that there needs to be engagement of external agencies in producing Local Development Strategies. LINK strongly disagrees with the 'sustainable economic growth' focus. Rather we recommend a clear statement on LEADER supporting sustainable development.

SECTION 15 – KNOWLEDGE TRANSFER & INNOVATION FUND (KTIF)

Question 29

Do you agree with the range of options being included within KTIF scheme?

	Yes	No	No opinion
Skills development	X		
Vocational training	X		
Monitor farms	X		
Setting up an EIP network			X

Question 30

How would you rate your broad satisfaction with the proposals for KTIF?

	Very satisfied
X	Quite satisfied
	Neither satisfied nor dissatisfied
	Quite dissatisfied
	Very dissatisfied

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We are in support of the KTIF being tied more closely to the support for co-operative action, capital funding, the advisory service and the SRN, as this could generate multiple impacts from funded projects and make them more coherent and effective in their delivery.

SECTION 16 - ADVISORY SERVICE

Question 31

How would you rate your broad satisfaction with the proposals for the Advisory Service?

	Very satisfied
	Quite satisfied
X	Neither satisfied nor dissatisfied
	Quite dissatisfied
	Very dissatisfied

LINK is mostly supportive of the Advisory Service proposals, however there remain too many unknowns. **We are concerned that the proposed structure may be stymied due to insufficient funds to realise all the existing and new elements that are planned in the new structure.**

We welcome increased support including specialist archaeology/historic environment advice. However, we believe proof in its effectiveness will be in the detail where environmental advice is fully integrated with agronomic & commercial advice. The focus of the scheme must be on sustainability and not economic growth per se.

We are concerned about the omission of provision of technical advice and guidance for organic conversion and production. This is currently provided through SG's Veterinary and Advisory Services programme by SRUC, and independently (with no government funding) by organic certification bodies including Soil Association Scotland and SOPA. We would like to see dedicated provision retained and enhanced in the new Advisory Service, and include more support for market opportunity and business development advice. We would like to see this provided as an integral part of any advisory scheme for farmers in recognition of the soil and water quality, diffuse pollution control, biodiversity and climate change mitigation benefits of organic food and farming.

SECTION 17 – SCOTTISH RURAL NETWORK

Question 32

Do you think the tasks set out above are the most appropriate ways for the SRN [Scottish Rural Network] to add value to the implementation of the SRDP?

	Yes	No	No opinion
SRN website	X		
Gathering of good programme examples	X		
Disseminating information to the public	X		
Organisation of events	X		

Are there other activities or services you would like to see the SRN provide?

We welcome the proposed development of the SRN especially to improve the implementation of the SRDP and specifically the Agri-Environment-Climate scheme.

Question 33

Do you agree with the proposal to establish thematic working groups as an approach to supporting the Rural Development Programme priorities?

X	Yes
	No
	Other

We welcome the thematic working group approach and recommend that it includes an Environment Theme as a place to discuss the Agri-Environment-Climate scheme.

Question 34

How would you rate your broad satisfaction with the proposals for the Scottish National Rural Network?

	Very satisfied
X	Quite satisfied
	Neither satisfied nor dissatisfied
	Quite dissatisfied
	Very dissatisfied

There is an acknowledged need for the Rural Network to engage more effectively across the full range of constituents (i.e. not just with community groups). Must represent environmental concerns and improve the implementation of the SRDP and specifically the Agri-Environment-Climate scheme.

SECTION 18 - COMMUNICATIONS

Question 35

How would you rate your broad satisfaction with the proposals for communicating the new Scotland Rural Development Programme?

	Very satisfied
	Quite satisfied
X	Neither satisfied nor dissatisfied
	Quite dissatisfied
	Very dissatisfied

SECTION 19 – MONITORING & EVALUATION

Question 36

We would welcome feedback on the approach outlined in Table 9

LINK is concerned that the Scottish Government must not simply aim to meet the indicators set by the EC. Instead, we recommend, monitoring and evaluation be put in place which also aims to show if the £1.3bn being spent is good value for money and having the intended impact. For example, it is essential there is proper biological monitoring. Furthermore, an M&E scheme should be designed to inform the development of future schemes. We do not believe that meeting the minimum set of indicators set by the EC will help do this.

We find Table 9 to be vague and therefore difficult to draw strong conclusions. However, we welcome amending existing surveys (row 2) to make them better suited to help with

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SRDP evaluation. A huge amount depends upon which data sources or commissioned work are intended to be captured by row 3.

Question 37

Are there any other data sources which could inform the impact of the programme?

	Yes
X	No

Question 38

We would welcome feedback on the proposed approach to filling the gaps in the data required by the European Commission, outlined in Table 10

No comment

Question 39

Are there any other gaps that you wish to make us aware of?

X	Yes
	No

LINK notes no mention of biodiversity indicators in Table 10. We believe that biodiversity indicators are an important indicator to measure SRDP impact but the existing biodiversity indicators are not sufficient to do this. We therefore recommend that this gap is addressed in the next SRDP.

Question 40

Are there any other data sources which could help us fill the data gaps?

X	Yes
	No

A more detailed discussion of appropriate data needs to adequately evaluate biodiversity impact of the SRDP is needed with environmental NGOs including a discussion of available datasets.

SECTION 20 – IMPACT ASSESSMENTS

Question 41

We would welcome comments on the BRIA [Business & Regulatory Impact Assessment]

No comments

Question 42

We would welcome comments on the EQIA [Equalities Impact Assessment]

No comments

This response was compiled on behalf of LINK's Agriculture Taskforce and Woodland Forum and is supported by the following LINK members:

- Amphibian and Reptile Conservation
- Archaeology Scotland
- Badenoch and Strathspey Conservation Group
- Bat Conservation Trust
- Bumblebee Conservation Trust
- Butterfly Conservation Scotland
- Buglife – The Invertebrate Conservation Trust
- Froglife
- National Trust for Scotland
- Plantlife Scotland
- Ramblers Scotland
- RSPB Scotland
- Scottish Wildlife Trust
- Soil Association Scotland
- Woodland Trust Scotland

For more information contact:

Jim Densham – Deputy Convener of the LINK Agriculture Taskforce,
Senior Land Use Policy Officer, RSPB Scotland
jim.densham@rspb.org.uk, 07738 648977

or the LINK Parliamentary Officer, Andy Myles
on 0131 225 4345 or via email on andy@scotlink.org
www.scotlink.org