

To enter the electronic consultation on the European Commission's proposals for future "Rural Development":

<https://response.questback.com/scottishgovernment/capsurveyruraldevelopment/>

This consultation covers the draft Regulations that the European Commission has recently published on the future Common Agricultural Policy (CAP) post-2013. The proposals cover all aspects of the CAP and include a new system for making direct payments to farmers (Pillar 1), revised funding mechanisms for a variety of rural development initiatives (Pillar 2) as well as the future inspection and audit requirements that will apply to both pillars.

- strongly agree
 - agree
 - neither agree nor disagree
 - disagree
 - strongly disagree
 - I don't know
-

SECTION 1: RURAL DEVELOPMENT

Background

The purpose of this part of the consultation proposals is to seek views on the proposal from the European Commission regarding support for rural development from 2014 onwards. Responses will be used to inform the Scottish Government's position in future negotiations. We have allowed for specific comments to be made on certain questions due to the technical nature of the proposals. Where you would like to make additional comments on any other aspect of the proposals we have placed a text box at the end. The Scottish Government will be undertaking a formal consultation on the content of a new Scotland Rural Development Programme (for 2014-20) during 2012 and beyond, with a view to having the programme agreed and in place for 1st January 2014. To ensure that we have the best possible chance of having the programme developed in time we will be developing it while the European regulations are going through the approval process within Europe. The proposals from the Commission retain many elements of the current rural development regulation EC 1698/2005 and overall contain welcome aspects in terms of simplification. However there are elements which potentially increase the bureaucracy and may not adequately reflect local circumstances. The Commission propose that the 3 axes directed at economic, environmental and social issues, and their minimum spend requirements, be partially removed. Instead of axes it is proposed that there are 6 priorities for investment (listed below) and only minimum spends for agri-environment of 25%, and 5% for LEADER, remain. The measures (which for Scotland are broken down further into options) have been reduced from 44 to 24. This is intended for simplification purposes as the actions that can be undertaken within the measures available appear broadly similar to what has gone before. However to ensure we have a deep understanding of the proposed changes to measures we would welcome views from those affected. The Commission also propose that sub-programmes can be devised, with higher support rates, focussed, in particular, on the needs of: young farmers; small farmers; mountain areas and short supply chains. In addition to the proposals regarding Rural Development the Commission have also proposed that The European Agricultural Fund for Rural Development (EAFRD) will fit into the new Common Strategic Framework which also applies to Structural Funds and Fisheries. You can access the proposals via the following links:

http://ec.europa.eu/agriculture/cap-post-2013/legal-proposals/index_en.htm - Rural Development (2011/0282)

http://ec.europa.eu/regional_policy/what/future/proposals_2014_2020_en.cfm - Common Strategic Framework (2011/0276)

General provisions

The objectives for the Rural Development Programme as outlined in the proposals from the Commission are:

- The competitiveness of agriculture;
- The sustainable management of natural resources, and climate action;
- A balanced territorial development of rural areas.

The priorities are:

- Fostering knowledge transfer and innovation;
- Enhancing competitiveness;
- Promoting food chain organisation & risk management;
- Restoring, preserving & enhancing ecosystems;
- Promoting resource efficiency & transition to low carbon economy;
- Promoting social inclusion, poverty reduction and economic development in rural areas;

Do you agree with the objectives and priorities of EAFRD as set out at article 4 and 5?

Agree

The Sub-programmes specifically mentioned in the proposals are:

- young farmers;
- small farms
- mountain areas
- short supply chains.

Do you agree with the proposals regarding thematic sub-programmes which are set out in article 8 and Annex III?

Agree

Investment measures

The measure options available to the Scottish Government for investment are broadly similar to what has gone before:

Article 15: Knowledge transfer and information actions

Article 16: Advisory services, farm management and farm relief services

Article 17: Quality schemes for agricultural products and foodstuffs

Article 18: Investments in physical assets

Article 19: Restoring agricultural production potential damaged by natural disasters and catastrophic events and introduction of appropriate prevention actions

Article 20: Farm and business development

Article 21: Basic services and village renewal in rural areas

Article 22: Investments in forest area development and improvement of the viability of forests

Article 23: Afforestation and creation of woodland

Article 24: Establishment of agro-forestry systems

Article 25: Prevention and restoration of damage to forests from forest fires and natural disasters and catastrophic events

Article 26: Investments improving the resilience and environmental value of forest ecosystems

Article 27: Investments in new forestry technologies and in processing and marketing of forest products

Article 28: Setting up of producer groups

Article 29: Agri-environment- climate

Article 30: Organic farming

Article 31: Natura 2000 and Water framework directive payments

Article 32: Payments to areas facing natural or other specific constraints

Article 33: Designation of areas facing natural and other specific constraints

Article 34: Animal welfare

Article 35: Forest-environmental and climate services and forest conservation

Article 36: Co-operation

Article 37: Risk management

Article 38: Crop, animal, and plant insurance

Article 39: Mutual funds for animal and plant diseases and environmental incidents

Article 40: Income stabilisation tool

The exact wording of the investment measures can be viewed by accessing the regulations via the link provided. **Please let us know if you have any comments on the specific wording of the measures which Scottish Government are able to choose investment priorities from.**

LINK believes that Measures under Article 29 should be at the bedrock of the next SRDP and welcome the commitment to spend at least 25% of funding on this measure. We are less certain that Articles 37-40 are appropriate for rural development and would recommend they should not be implemented. Individual LINK organisations will respond more specifically to individual measures and more generally to wider integration of measures through the different working groups. In general in the development of these measures we are looking for a more holistic approach at a landscape scale that is driven by an ecological service approach covering all aspects of LINK interest including biodiversity, landscape, cultural heritage, recreation and organic farming as well as supporting local communities. We welcome, for example, proposals to strengthen Advisory services under Article 16 and believe that Article 15 Knowledge transfer could be linked with cross compliance and direct payment requirements to produce a more integrated programme with greater emphasis on targeting higher level funding at priority areas for improved sustainable management.

LEADER

The LEADER concept allows local communities to access the SRDP and facilitates local development. The Commission are proposing this is retained in the next programme period; we welcome views on this. **Do you agree with the proposal re LEADER in Articles 42 - 45 and the proposed minimum spend of 5% of budget set out in Article 65(5)?**

Agree

Common Strategic Framework

Do you agree with the proposal that EAFRD comes under a Common Strategic Framework (CSF) as set out in the CSF regulations?

Agree

The Common Strategic Framework (CSF) involves the agreement of a partnership contract between the Member State and the Commission which will set out how the CSF is to be taken forward, with regard to the Union objectives and priorities. The CSF regulations contain the detail of the requirements placed on Member States. The aim of the CSF is to ensure improved coordination and strategy between the funds and better targeting of investments to reduce any inefficiency, via the involvement of Local Development Partnerships to focus the funds. Please feel free to make specific comments regarding this proposal in the text box below.

The questions above focus on the most significant issues included in the proposals that effect the investments that can be made under the SRDP. However there are other aspects included in the proposals that you may want to comment on. If so please feel free to make comments in the box provided below.

Though the majority of LINK members broadly agree with the objectives as set out by the EC, in particular the sustainability of natural resources and climate change and the ecosystem approach, we would also wish to see additional emphasis placed on efforts to protect our landscapes. We believe that underlying the adoption of all the measures should be an underlying principle that no environmental harm should be involved in measures adopted and clear market failure to supply public goods should be the only logic behind business intervention.

This response was submitted by Jonathan Wordsworth on behalf of Scottish Environment LINK's Agriculture Task Force members as follows:

**Archaeology Scotland
National Trust for Scotland
RSPB Scotland
Scottish Wildlife Trust
Woodland Trust Scotland**