



Scottish
Environment



Less Favoured Areas Support Scheme in Scotland (2010-2013)

Response of Scottish Environment LINK to the Scottish Government Consultation

Scottish Environment LINK is the forum for Scotland's voluntary environment organisations - 32 member bodies representing a broad spectrum of environmental interests with the common goal of contributing to a more environmentally sustainable society. LINK assists communication between member bodies, government and its agencies and other sectors within civic society. Acting at local, national and international levels, LINK aims to ensure that the environment is fully recognised in the development of policy and legislation affecting Scotland.

This response is supported by the following organisations:

Archaeology Scotland
Bumblebee Conservation Trust
Butterfly Conservation Scotland
National Trust for Scotland
Plantlife
RSPB Scotland
Scottish Wildlife Trust

**Summary**

LINK believes that the current LFASS interim is not effective in securing additional public benefits from land management and is in need of urgent reform. The current scheme neither rewards land managers for the production of public goods nor truly recompenses for disadvantage. LFASS makes up the largest part of axis 2 of the Scottish Rural Development Plan. The £61m of dedicated funding is much greater than the amounts put aside for forestry or agri-environment. In order to meet the aims of axis 2 and form a justifiable basis for payments in the long term, redistribution of LFASS funding must be addressed as a matter of urgency.

It is essential that LFASS payments be tied to livestock activity. A start could be made by restoring the cattle top-ups, frozen under the interim scheme. Attaching meaningful eligibility criteria (as described in our response below) could help better target LFASS to High Nature Value (HNV) farming. It is clear that if rapid action is not taken to address reduction of livestock numbers in Scotland's upland areas, land management may be lost from certain places. While in some cases, reduction of grazing may have positive environmental effects, the Scottish Government needs to make decisions now about where to focus funding to secure the public benefits that HNV farming can provide. Linking LFASS with livestock activity is one obvious way of addressing this issue. However, it should not be considered in isolation. Reform of the Scottish Beef Calf Scheme and distributing Single Payments on an area basis could also be used to target support better at sensitive grazing systems.

In the longer term, LINK believes that a payment targeted to retaining HNV farming systems is justified. This could differ from traditional agri-environment payments in that a change in practice would often not be required in order to receive support but the continuation of land management that benefits the environment. An area-based payment with eligibility criteria might therefore be more suitable than payments targeted very specifically at individual options. This is not to say that targeted payments are not required. LINK recommends that higher level payments should be available for targeted management to address specific issues in a similar manner to current agri-environment. Scottish Environment LINK's vision for long-term funding for land management is laid out in more detail the document "Beyond the CAP: Towards a sustainable land use policy that works for Scotland"¹.

Q1 What are your views on the use of "mountain area" designation and "specific handicap" designation for islands as outlined in Annex 3?

LINK recognises that land managers in island and upland areas often provide valuable environmental services such as managing habitats for biodiversity, maintaining the landscape and providing ecosystem services such as water management. If parts of Scotland's LFA are more accurately described under the 'mountain area' or 'specific handicap' articles, then they should be re-designated as such, irrespective of the future potential to classify 'intermediate' LFA under Article 19. LINK suggests the Scottish Government research what these designations would mean for Scotland and provide more information on this to stakeholders.

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



Q2 What are your views on the approach to calculating payments set out in Annex 4? Do you have alternative suggestions?

LINK believes the Macaulay Land Capability for Agriculture could provide a useful tool to better define the area included in the LFA. However, LINK believes that payments should not be based on potential productivity (or lack of it). Since LFASS is an axis 2, rural development payment, it should be better linked with environmental objectives.

Q3 What are your views on this rationale and these objectives for LFASS?

LINK supports the rationale for LFASS (though the fact that LFA covers 85% of Scotland is not part of its rationale). While LINK does not debate that LFASS contributes to axis 1 and 3 aims, since it is defined as an axis 2 payment, it must have a strong environmental component. The main purpose of the payment should be to maintain and enhance the environment.

Q4 Would you be in favour of continuing the current interim scheme with no significant changes?

No. The current interim scheme does not provide sufficient environmental benefits.

Q5 Would you be in favour of continuing the current interim scheme, but with some redistribution of payments? Do you have alternative suggestions?

No, while redistribution will be needed, LINK supports fundamental changes to how and why LFASS monies are paid out.

Q6 What are your views on the principle of creating a closer link with livestock-related activity?

LINK believes this is essential if LFASS is to have a clear objective. The retention of appropriate levels of grazing, and of suitable mixed (cattle and sheep) grazing regimes is fundamentally important in many of Scotland's more remote areas. It is important to ensure the continuation of populations in these areas, involved in land management, but it is also important for the environmental outcomes it provides. In the future, LFASS should be designed not to increase livestock production but to ensure that the right levels of grazing are carried out in the right areas. This should be determined by the environmental benefits produced. It may be in some cases that declines in livestock numbers are not necessarily a bad thing. In other cases, abandonment could have large negative impacts. The environmental benefits of HNV grazing systems, in terms of the maintenance of landscapes, habitats and species, and provision of ecosystem services could be achieved through some simple eligibility criteria and conditions attached to payments.

Q7 What are your views on the approach set out in paragraphs 6.4 - 6.6 on (i) creating a closer link with livestock-related activity, (ii) helping new entrants and others taking on land that did not attract LFASS in 2006, (iii) re-establishing the cattle-top up link?

While updating the interim scheme with new values is better than leaving it as it is, LINK believes, this does not relate payments closely enough to on the ground activities.

As LINK and RSPB Scotland have suggested to the stakeholder group previously, we support the introduction of basic eligibility conditions. These would include limits on appropriate stocking densities (minimum and maximum), requirements for a minimum area for grass or hay, a minimum area for fodder crop production, or a



minimum area of semi-natural habitat (usually grassland) on the holding. This would allow new entrants into the scheme and ensure all receiving LFASS were involved in a realistic level of active management.

We support the re-establishment of a link between increased or supplementary LFASS payments with a higher level of grazing management. This would replace the old cattle 'top-up' and would ensure that LFA payments were targeted towards the objectives of Axis 2 of the RDR, to which they must contribute. Increased payments targeted at specified grazing management should be financed from the portion of the LFASS budget that was previously devoted to cattle top-ups- around £20 million per annum

Q8 How could delivery of environmental benefits be improved?

Delivery could be improved using the measures suggested above and by making a clear link to the importance of livestock activity in delivering environmental benefits. Given that LFASS makes up the greatest portion of axis 2 of the SRDP, it is important that it is seen to deliver environmental benefits. The alternative would be to design a scheme specifically aimed at the retention of high nature value and traditional agricultural landscapes.

Q9 What are your views on reallocating a proportion of LFASS money to other measures within the SRDP?

A well-designed LFASS scheme could serve a useful purpose by making payments to retain environmentally important agricultural activities rather than paying for specific actions as current agri-environment schemes are designed to do. This would deliver landscape scale environmental benefits as well as supporting less economically competitive systems and dependent rural families and communities. However, if the scheme is not reformed, LINK would support moving funds to agri-environment options for more effective and relevant delivery. This redistribution of funding would provide best value for money by and targeting these specifically at grazing systems and upland areas. LINK would be against moving LFASS funds to axis 1 or 3 of the SRDP.

Q10 Do you have any other suggestions for the second interim scheme?

It is important that monitoring for the SRDP includes assessing the environmental benefits that LFASS provides. This needs to go beyond what is required by the CMEF, to provide detailed information on what the scheme has achieved as well as baseline data needed to put in place suitable grazing management.

For more information on LINK's views on the future of land management subsidies, please see our report: *Beyond the CAP: towards a Sustainable Land Use Policy that works for Scotland* or contact the LINK Agriculture Task Force convenors:
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