

Briefing for the debate on the proposed reform of the Common Agricultural Policy 18th January, 2012

From: Scottish Environment Link Agriculture Taskforce

Scottish Environment LINK is the forum for Scotland's voluntary environmental sector organisations, with over thirty members collectively representing around half a million people. LINK has been working for many years with Scottish Government, MSPs, land managers and wider civic community to promote sustainable land management through the Common Agricultural Policy. LINK members have staff, offices, volunteers and considerable land holdings (and experience) across Scotland.

CAP reform will to have a strong impact on how Scotland's land is managed in the years to come. LINK continues to advocate that the allocation of public money should be based on the broadest range of public and environmental benefits. This is best achieved by approaching land management in an integrated, cross-boundary approach. Scottish Environment LINK, therefore, welcomes the Scottish Government's commitment to 'Getting the best from our land' through using the Scottish Land Use Strategy. LINK believes that the resolution of land use conflicts can be helped by a Land Use Strategy that offers mechanisms and processes for dealing with land use conflicts.

Basic Farm Payment

LINK wishes to see the Scottish Government implement a regional model of support for the Basic Payment Scheme which actively favours re-distribution (albeit progressively) towards the more economically disadvantaged but environmentally and culturally important farming and crofting systems in the north and west of Scotland. To this end, the number of regions within Scotland should be minimised.

Cross compliance

LINK is concerned that the current proposals to simplify GAEC (Good Agricultural and Environmental Conditions) will be at the expense of existing legal requirements to protect, amongst others, the environment under the Birds and Habitats Directives. We would welcome more pragmatic solutions like a Scottish Government to supply all farmers with online or paper copies of the environmental and landscape features on their land, so that these features can be more robustly protected. The draft European Commission proposals recommend a strengthened Farm Advisory service and we support a system where more pro-active advice can be sought and given. This has been carried out to good effect south of the border, where over 67% of farm land is now within an environmental scheme. Similar levels can be achieved in Scotland with the support of the Scottish Government.

Greening - payment for agricultural practices beneficial for the climate and the environment

Within the specific proposals from Europe, we encourage the Scottish Government to:

- seek some flexibility in the crop rotation requirement to reflect local farming practices;

- pursue a more targeted form of protection for permanent pastures of high environmental and landscape value and to remind farmers that the ploughing of uncultivated land is subject to Environmental Impact Assessment regulations, both during this period and beyond whatever changes may ensue as a result of the CAP reform;
- support Ecological Focus Areas and call for their extension to apply to at least 10% of all eligible farmland including permanent pasture.

Rural Development Funding

We support the Scottish Government's call for an increased share of rural development funds for Scotland and urge it to make the case for this based on clear and defined environmental and social need. To support this case, current domestic rural development spending must be maintained and ultimately increased, not cut as proposed by the recent spending review. We call on the Scottish Government to support the proposal for voluntary modulation and apply it and reject 'reverse modulation'. We welcome the continuation of key measures such as agri-environment, forestry, organic farming and support to areas facing natural or other specific constraints, in order to deliver environmental goods and services. LINK looks forward to contributing to the development of the next SRDP in due course.

Areas of Natural Constraints

We welcome efforts to replace the unsatisfactory Less Favoured Area Scheme with a more robust system that adequately compensates remote and disadvantaged areas so that the environment and communities in these remote areas can be adequately compensated.

Conclusions

Whatever the EU framework adopted, there is likely to be a considerable amount of subsidiarity which will allow Member States (and regions within) to define the exact nature of the changes to take place. It will be decisions taken by the Scottish Government therefore that will be the major determinant of the agronomic, environmental and social impacts felt in Scotland, within the broad scope of moving to a regional model of support, defining greening options and developing a future rural development programme. There will be considerable pressure on Ministers to maintain, as far as possible, the status quo in Pillar I by minimising redistribution and applying limited greening requirements. LINK calls on the Scottish Government to resist this pressure and to implement a reform that will enhance support to the most vulnerable and high nature value farming systems in Scotland and lead to greater sustainability elsewhere. Regarding Pillar II, there is likely to be broader and more unified support across all stakeholders for increased rural development funding and an SRDP that delivers clear outcomes. The demands on the next SRDP will be considerable however and LINK calls on the Scottish Government to prioritise the protection and enhancement of the natural and historic environment in the targets and measures selected.

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Scottish Environment LINK is a network of over 30 organisations working together for the well-being of Scotland's natural and cultural environment.

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