

SRDP MID TERM EVALUATION – Note from Scottish Environment LINK

Introduction

LINK's members have a range of expertise on the SRDP from involvement in the policy design, to advising applicants, to applying to the scheme themselves. This paper collates the results of a LINK meeting on the SRDP and gives some points where it could be improved.

This note focuses mostly on the Rural Priorities scheme. While we criticise aspects of its implementation, this is because out of all schemes included in the Rural Development Programme, it has the most potential to deliver environmental benefits. We believe the CAP should be reformed along the lines laid out in our publication "Beyond the CAP"¹ with greater emphasis on targeting all agricultural funds to support the provision of public goods e.g. protecting Scotland's environment, heritage and landscapes.

As currently used, schemes such as Land Managers' Options and the Less Favoured Area Support Scheme, while being (at least partially in the case of LMOs) included in axis 2 of the Rural Development Regulation, are poorly targeted to deliver environmental benefits. While the LMO scheme should be attractive to farmers due to the simple application process, there are few environmental options and these tend to have low uptake. The lack of any requirement for planning, advice or taking up a range of complimentary options means the scheme is unlikely to deliver wide-ranging environmental benefits. LFASS, while being justified on environmental grounds, is not sufficiently targeted to deliver environmental benefits. Higher payments tend to be allocated to more intensive grazing systems which in general have lower environmental worth. Grazing levels should be established according to requirements for maintaining particular habitats rather than trying to maintain historical grazing levels.

There is a lack of coherence between the different schemes within the SRDP. In addition, the lack of monitoring or even information on uptake hinders a proper analysis of how well the different schemes are performing.

Management

- There are serious problems with the management of the programme e.g. lack of resources, management style, ability to respond quickly enough to meet challenges of very ambitious programme
- Scottish Government should consider harnessing external help to manage the programme, particular the computer systems
- The scheme was launched before it was fully conceived and developed with no prior testing. It is important we learn from this and have trial scheme before changes are introduced – potential to trial better monitoring, payment for results, etc.

¹ <http://www.scotlink.org/files/publication/LINKReports/LINKatfReportBeyondCAP.pdf>

- There is a need to plan annual expenditure better. At the start of the programme, many projects were funded which did not necessarily meet high standards. Now there is a much higher barrier for applicants.
- There is a need for clear understanding of the EU Regulations and what they allow at the outset
- The scheme needs to be adaptable to deal with implementation problems and changes in priorities. However, too many changes will lead put off applicants and make it difficult to maintain a working knowledge of the scheme.

System complexity

- IT – problems with flexibility of system
- Need to be able to have multiple agents accessing applications. Currently there are ways to do this but the process is complicated.
- There should be a non-electronic option to enter applications – some applicants have no broadband access. This has been observed as a particular problem in crofting areas.

Priorities and Regionalisation

- Need to think more about how public benefits are demonstrated for all axes of the programme and review the national priorities in this light
- There is a lack of clarity on priority species and geographic range
- Better regionalisation of priorities is needed so the applications are assessed against actual priorities rather than other assessment criteria
- However, national priorities need to be taken into account when regionalising, e.g. current use of LBAP targets is not appropriate as the lists can be fairly arbitrary and have not been subject to appropriate scientific assessment. BAP targets should be the national target and the regionalisation process should include analysis of where these species exist in a particular region or could with appropriate management and whether their status can be improved through agri-environment management.
- The system needs to do more to reflect/encourage 'whole habitat' improvement and encourage the establishment of habitat networks

Application Process

- Timing of RPACs – their regularity and frequency – is important. Dates should be set in advance so that RPACs always occur at a particular time in the year and applicants and case officers can plan ahead. There are problems where immediate action is needed e.g. plant health.

- Payment – needs to be quicker with clear remittance advice so land managers recognise what it is for
- No straightforward options available without committing to large-scheme design
- Assessment criteria do not truly assess priorities. If something is a priority there is no further assessment of how important the application is in meeting the priority.
- While the scheme is supposed to encourage applicants to meet multiple priorities, in practice this may not be sufficiently recognised, particularly where the priorities are from different axes of the Rural Development Regulation and are scored separately.
- There are problems with the collaboration assessment e.g. you can only “collaborate” when neighbours are in the current scheme and cannot if they are carrying out similar management from a previous scheme. In addition, there is no real commitment to collaborate but only to carry out management for similar purposes.
- The assessment criteria and process of trying to maximise the points awarded to the application often results in “point-chasing” - the inclusion of a range of options that are not necessarily in the best ecological interests of managing the site. For instance, proposals that include only one option are unlikely to be funded even if the site is ecologically uniform and requires only one type of management. Woodland blocks are often included as this guarantees extra points even if the woodland is detrimental to other ecological or landscape interests on the site.
- There is a tendency to adopt a rigidly formulaic approach to the assessment of proposals that results in measures that are eminently suitable in ecological terms being rejected because they are not in accordance with the standard prescriptions. There should be more use of expert assessment of the proposals by staff who understand the ecological objectives
- There is much variety in the approaches of RPACs which distorts competition between those entering the scheme
- There is a need better advice provision – better use should be made of case officers
- The role of specialist advisors very important in targeting measures at species. However, there are serious time commitments and costs for the NGOs involved in these activities and consideration is needed of how best to use advisors
- Follow up care for an applicant is very important. This should be built into applications
- In some cases there is a need to forward plan for large numbers of people coming out of agreements. SAC could target areas with a lot of people coming out with additional advice provision. Scottish Government could require them to do this as part of their grant agreement.

Options

- The flexibility in certain options e.g. the ability to produce a grazing management plan for species rich grassland is to be welcomed. However, this is only useful where appropriate advice is available.
- Many options only available on in-bye land – very low rates on hill land means that these options are not taken up.
- It should be possible to have an in-between rate between the most productive in-bye and least productive moor. There is currently a sharp drop between £100s to £1s. The “Coastal Heath” option has tiered payments (£77 per hectare per year up to 30 hectares, £44 per hectare per year for next 40 hectares and £1.30 per hectare for the rest). This was due to detailed economic work SNH did looking at farm structures and the relative costs for different sized farms when the option was part of Natural Care. The income forgone, additional cost calculation of rates is not entirely inflexible, you can also include things like time requirements. There is a need to look into the economics of particular options in more detail. A degressive payment rate might be appropriate for moorland.
- Archaeology measures in LMOs are within axis 3 and land managers are only compensated for capital costs rather than income forgone and additional costs. This makes the measure unattractive and uptake has fallen since the last programme.

Monitoring

- There is a need to set targets at the start of the programme for what it should be delivering e.g. how much of a particular habitat would we like the programme to deliver or how big an increase in species population is expected from management
- The effectiveness of individual options and the whole scheme should be assessed against its objectives
- Adjustment and response to monitoring should be allowed in the programme to ensure delivery of outcomes
- There are problems of accessing data produced by different government agencies. NGOs should have access to this to allow research and monitoring to progress
- There is a need for better reporting of uptake and location of options – currently, for example there is no public information on uptake of LMOs
- Some measures do have a small amount of monitoring built in e.g. lowland raised bogs where applicants have to submit an annual monitoring form. This approach should be widened to include other options
- RSPB sometimes includes a requirement to monitor in the applications they advise. This is added as leverage points for the applicants. Other advisors could try this approach

- A payment-by-results scheme could be trialled. This might provide additional basic information on presence of species and habitats or important cultural sites or landscape features
- Biodiversity action reporting scheme in England used to input information to farm level. This could be put to better use by farmers.

Other issues

- Cannot expect SRDP to deal with everything. Some things do not fit neatly into SRDP e.g. conflict resolution such as geese or issues where an immediate response is needed e.g. dealing with phytophthora. There could be some benefits in reconstituting Natural Care which better targeted the specific management needed on sites.
- There is a concern that the only route to do everything is increasingly through SRDP. This results in too much reliance on one mechanism.
- Need to look at legal issues of land ownership, tenancies etc. Heritable graziers have a right to graze land 300 sheep. Neither the grazier nor the owner can enter into SRDP agreement. There are problems with Deer management. Although there are measures for controlling both livestock and deer grazing (on SACs and SPAs), if they're on the same site, there's only one IACS and the landowner and tenant can't both enter into agreements. It is unclear if there are ways Scottish Government could get around this with current EU legislation.