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Scottish Executive
Pentland House
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Dear

Scottish Rural Development Programme 2007-2013

Scottish Environment LINK has been pleased to be involved in the development of the new Scottish Rural Development Programme (SRDP) to date, including submission of our response to the Scottish Executive's consultation. We are, however, becoming increasingly concerned about some aspects of the programme's development, and I have outlined these below.

- The prospect of low levels of funding for the SRDP concerns us, as I'm sure it does you, and makes us very aware of the need to deliver the best possible outcomes for the limited public funding that is available.
- There is a lack of transparency about the extent of the Executive's existing commitments in relation to rural development spending. **Could we see budget projections for maintaining existing levels of spend on schemes that are anticipated to come under the LMC umbrella, into the new programme period?**
- There must be appropriate targeting of scarce resources to achieve maximum public benefit from land management, and to ensure that Scotland complies with all of its environmental requirements and objectives, including the Gothenburg commitment to halt biodiversity loss by 2010, objectives under the Water Framework Directive and the Kyoto protocol on climate change. The UKBAP and the Scottish Biodiversity Strategy must also form the context for targeting SRDP funds.
- Targeted action must deliver planned outcomes, and suitable levels of planning and advice must therefore accompany **all three** tiers of Land Management Contracts (LMCs). I am concerned that progress on these structural aspects of LMCs is slow.
- LFASS, likely to encompass the majority share of the SRDP budget, **must** demonstrate delivery of environmental and other public benefit. We are particularly concerned that current proposals will not achieve this, and will not reflect current stocking practice on the ground. **Could we have an assurance that SEERAD will re-visit these original proposals, with expert stakeholder input?**
- In order to best target public funds, LMCs must reflect both national **and** regional priorities. The development of a suitable structure to set priorities is not well advanced and this is also of great concern.
- The SRDP stakeholder process in which LINK has been engaged, has involved considerable effort to input expert views on a range of strategic and technical issues. We do not feel that this stakeholder effort has always been used to best effect. There have, for

example, been instances where early stakeholder input has subsequently been overlooked, and the same input requested again. I appreciate that the department has a heavy workload and demanding timescales in which to deliver this, but processes for effectively engaging stakeholder expertise must work effectively, to maximise the benefit for all concerned.

- Our primary concern, however, is that, despite considerable stakeholder involvement, progress on the SRDP and the launch of LMCs may be delayed, in part due to the timetable for budgetary decisions, and the European Commission approval process. **There is an urgent need to clarify the contingency plans that the Executive will use should such a delay occur.**
- Currently, the Rural Stewardship Scheme and the Scottish Forestry Grants Scheme have closed. We could not accept an absence of similar agri-environment or forestry schemes in the coming year, in the event that LMCs are not launched in January 2007. **Please could you clarify, as a matter of urgency, what contingency plans SEERAD has in place? Is an extension to these schemes possible, under transition arrangements, until such time as fully funded and developed LMCs can be launched?** In LINK's view, this could prove to be the 'least bad' option for 2007.
- There is also the outstanding issue of those whose agri-environment agreements are coming to an end this summer of 2006. **Will there be arrangements put in place so that the conservation work carried out by land managers under these schemes is not brought to a halt by the absence of an automatic transfer to another agri-environment programme in 2006?**

I look forward to hearing from you.

With all best wishes,

F E Edwards
President