

Responding to a Scottish Government consultation – your help is needed

Consultation: ‘Agricultural Transition in Scotland: first steps towards our national policy’

What is this consultation about?

The Scottish Government has opened a public consultation [<https://consult.gov.scot/agriculture-and-rural-communities/agricultural-transition-in-scotland/>] which will help to inform its decisions about the future of farming policy in Scotland. These decisions will determine how more than £650 million of taxpayers money is spent each year supporting farmers and crofters and for what purposes. Answers to the questions in the consultation could determine whether money is used to encourage more sustainable farming and food production and whether it will help – or hinder – progress in tackling the nature and climate emergency.

Farming is a major source of greenhouse gas emissions and is contributing to the loss of nature. The adoption of low carbon and nature positive farming methods can however help address these problems. Making the transition to more sustainable farming and food production requires financial support for farmers from government and clear policies to be in place to drive progress.

Your views on these issues matter and could make a big difference.

Many farmers, and the organisations that represent them, will respond to this consultation. It is important that the Scottish Government hears a breadth of views including from consumers, taxpayers and concerned citizens, and from all those who want farmers and our government to take urgent action for nature and our climate.

Here’s how you can help

We need as many responses to the consultation as possible that emphasise the need for farming policy and payments to support low carbon and nature positive farming and crofting.

Below, we provide suggested answers to the questions asked in the consultation. You can copy and paste these answers into your response or use them to inform your own answers. If you only have limited time, we suggest questions 1, 3, 4, 8 and 9 and 12 are the most important ones to answer.

The consultation has 21 questions and will take between 30-45 minutes to complete.

Here’s how to respond

Responses to the consultation can be submitted via the Scottish Government’s consultation hub, Citizen Space. Access and respond to this consultation here: <https://consult.gov.scot/agriculture-and-rural-communities/agricultural-transition-in-scotland/> and go to the box saying ‘Give us your views’ at the bottom of that webpage then **click on ‘Begin Consultation’**. This will take you to a Foreword by Cabinet Secretary, Mairi Gougeon – click Continue at the bottom and you will be taken to the question and answer sections where you can respond and add comments. The deadline for responding is 17th November 2021 but please do it as soon as you can.

At the end you will be asked to complete some information about you and whether you are happy for your response to be published or not, with or without your name. Please choose to have it published but tick without name if you don’t want your name to show.

Consultation: 'Agricultural Transition in Scotland: first steps towards our national policy'

Below, we have provided suggested answers and comments for each question. You should feel free to amend your answers. Key phrases are bolded.

Baselining

1. Should agricultural businesses receiving support be required to undertake a level of baseline data collection?

- a. **Yes** ✓
- b. No
- c. I don't know

B. Please explain your answer

In order to reduce greenhouse gas emissions and improve outcomes for nature, as well as achieve other environmental improvements such as soil management and reduced water pollution, **individual farm businesses need to understand the current baseline situation on their farms through auditing and data collection.**

This data can be used for a number of purposes including **identifying areas for improvement at farm level, benchmarking against other businesses and to contribute to measuring progress against national indicators and targets.**

If farm businesses are to continue to receive substantial levels of direct payments in future then **undertaking a level of baseline data collection should be a minimum requirement.**

2. Should collected data be submitted for national collation?

- a. **Yes** ✓
- b. No
- c. I don't know

B. If yes, what information should be collated nationally?

In addition to collecting and collating **data relating to climate action and greenhouse gas emissions**, it would be hugely valuable to **collect farm level data about biodiversity and collate this at national level.** This would help to improve information and understanding of the state of nature (species and habitats) on farmland in both the lowlands and uplands and **identify what action farmers already are, or are not, taking for nature.**

C. Please explain your answer

We face a nature and climate emergency and need relevant and up to date information to guide action and measure success. Whilst some wildlife is relatively well surveyed and monitored e.g. many species of birds through the Breeding Bird Survey, there is considerable scope to improve the infrastructure for 'recording, managing, sharing and using wildlife data' according to the Scottish Biodiversity Information Forum (SBIF). Improving data flows about species and habitats on farmland could be highly valuable and support implementation of the Scottish Biodiversity Strategy and measuring progress in relation to nature recovery targets which the Scottish Government has committed to introducing. **Data from biodiversity audits would also identify what activities farmers are already taking that helps nature, what activities are damaging and need to stop and where there is scope to improve outcomes for nature.** The Scottish Government could use this farm level data to inform the targeting of schemes and payments.

3. What are the next steps that can be taken to commit businesses to continuous improvement utilising the information presented by carbon, soil, biodiversity auditing?

Please explain your answer

The information presented by carbon, soil and biodiversity auditing should be used to help prepare whole farm environment plans. These plans should identify: a) where urgent action is needed to reduce or minimise environmental impacts; b) activities/practices that should continue in order to maintain existing good practice; and, c) opportunities for action to enhance and improve environmental performance. The preparation of plans should be supported by farm advisors. Plans could identify sources of government financial support and grant aid for the activities included.

4. How can baselining activities be incorporated in to common business practices across all farm types?

Please explain your answer

Baseline activities can be incorporated into common business practices across all farm types through:

- Greater emphasis on the provision of education and training for farmers and Continuing Professional Development
- The provision of information, support for knowledge transfer initiatives and funding advisory services for farmers
- Supporting whole farm planning as a means to access government schemes and payments
- Provision of grant aid and support for baseline activities in some instances

Capital Funding

5. Should capital funding be limited to only providing support for capital items that have a clear link to reducing greenhouse gas emissions?

- a. Yes
- b. **No** ✓
- c. Don't know

B. If not, why not?

We face a nature and climate emergency and both aspects must be tackled together. Capital funding will be required in some cases to help farmers take action for wildlife and must therefore also be made available alongside funding for items that have a clear link to reducing greenhouse gas emissions. As noted in the consultation paper, capital funding has been an important component of the Agri-Environment-Climate Scheme and will continue to be needed in future to deliver biodiversity outcomes.

In all cases, **capital funding must deliver good value for public money and its use be limited to circumstances where assistance is needed to deliver positive outcomes for nature and the climate.** Where capital items are likely to improve farmers' financial returns through improvements in productivity and efficiency, and therefore make good business sense, offering capital funding should not be seen as the first option. It may be more appropriate to help farmers pay for such items through loans if there is a need to help increase the use of such items.

6. What role should match funding have in any capital funding?

Please explain your answer

Match funding should be required where government wishes to increase the uptake of capital items needed to achieve climate and nature outcomes but when capital funding is also likely to improve the financial returns of a farm business though e.g. improved efficiency. The greater the level of private benefit likely to result from providing capital funding, the higher the requirement for match funding should be.

7. What capital funding should be provided to the sector to assist in transformational change, particularly given that in many instances the support called for was directly related productivity or efficiency, that should improve financial returns of the business concerned?

Please explain your answer

As above, **capital funding should be limited primarily to helping the purchase of capital items that deliver measurable climate and nature outcomes and where uptake might otherwise be low.** Government should make an assessment of which items called for fall into this category. For items where both public and business benefits are likely to result, or where the benefit is largely for businesses, match funding should be required as should other means of financing such investments e.g. preferential loans. Capital items required to deliver biodiversity outcomes are most likely to deliver benefits that are public goods; capital funding should therefore continue to be made available from the public purse.

Biodiversity

8. Should all farm and crofting businesses be incentivised to undertake actions which enhance biodiversity?

- a. **Yes** ✓
- b. No
- c. Don't know

9. What actions would be required by the farming and crofting sectors to deliver a significant increase in biodiversity and wider-environmental benefits to address the biodiversity crisis?

Please explain your answer

Funding to support farmers and crofters to protect, maintain and enhance biodiversity should be a core and significant part of future farming policy. Delivering a significant increase in biodiversity and achieving wider environmental benefits in the farming and crofting sectors requires greater effort across all farm and croft land to:

- **Protect** and prevent damage to existing soil, air, water and biodiversity resources
- Manage cultivated and non-cultivated land to **maintain** the existing biodiversity value, especially where this is already significant
- **Enhance**, restore and recreate wildlife habitat on farms and crofts that is degraded or has been lost or where there is opportunity to create new habitat.

A wide range of actions appropriate at each of the above three levels, for all types/sectors of farming are already known about and understood to be effective for biodiversity and the wider environment. This is from existing research and some on-farm application. These actions can be grouped according to their relevance to: a) cultivated land – cropped and grassland e.g. requirements re pesticide and fertiliser use, livestock grazing levels; b) field margins and features around cultivated land e.g. hedgerows and scrub; c) permanent habitats not cultivated e.g. peatland, heathland, native woodland etc; and, d) specific species management e.g. for corncrake, geese, breeding waders, pollinators etc.

The Scottish Government should undertake an exercise to draw together this information on biodiversity measures and use it to inform policy development.

The completion of a biodiversity audit and whole farm/croft plan by every farm and croft would establish a baseline for species and habitats and could be used to identify activities that need to stop, continue and be introduced in order to help wildlife. Many of these activities will also deliver climate benefits e.g. peatland restoration or woodland creation.

A combination of policy tools is likely to be needed to secure the necessary scale and level of uptake of action for biodiversity including, in broad terms, regulation, incentives and advice. Government funding is especially critical here given that delivering for nature does not yield income for farmers and can entail significant costs.

Many of the above-mentioned actions for biodiversity are already options in the Agri-Environment-Climate Scheme and farmers with existing agreements are being supported financially to help nature. **Continuing funding for AECS in the immediate future and ensuring the measures within it continue to be part of new farming schemes and payments, in one form or another, is essential.**

More funding to increase the area of farm and croft land managed organically or under other agro-ecological farming approaches is needed and would deliver biodiversity and climate benefits. AECS also supports the conversion to and maintenance of organic farming and such support must continue in future.

Just transition

10. What do you see as the main opportunities for farmers and land managers in a Just Transition to a net zero economy?

Please explain your answer

A Just Transition to a net zero **and nature positive** economy is needed Together this would present many opportunities for farmers and crofters including:

- The potential to reduce input costs and transition to more efficient and profitable farm businesses
- Creating more resilient businesses in the face of climate change and other risk factors
- Producing food sustainably and responding to consumer demand for low carbon, nature positive products
- The potential to diversify into new enterprises and potential income streams
- Being properly rewarded for the delivery of biodiversity and other environmental public goods that the market does not currently pay for

11. What do you see as the main barriers for farmers, crofters and land managers in a just transition to a net zero economy?

Please explain your answer

The main barriers for farmers, crofters and land managers in a Just Transition to a net zero **and nature positive** economy are likely to be:

- A lack of knowledge and skills to help transition unless there is significant public investment in information provision, advisory services and training opportunities
- Lack of capital in some cases to make the necessary changes and transition
- Challenges for tenant farmers who wish to make changes but are unable to within the terms of their tenancies

Sequestration

12. How best can land use change be encouraged on the scale required for Scottish Government to meet its climate change targets?

Please explain your answer

The Scottish Government has stated that we face a nature and climate emergency and that these two issues are inextricably linked. How land is used and managed has a major role to play in addressing both these challenges whilst also producing food and other market goods such as timber. **Changes in land use and management are needed if climate change targets are to be met and the loss of biodiversity is to be halted.**

Encouraging the necessary land use change at the scale required will need strategic land use planning at national and regional level through processes such as the National Planning Framework, Regional Land Use Partnerships and Regional Land Use Frameworks. In relation to the latter, coverage is required for all regions of Scotland and faster progress to produce RLUFs is needed.

Securing change will also require government to deploy the right combination of policy tools including the use of regulation, incentives and advice. Incentives play a particularly important role in shaping business decisions about land use and management. **The Scottish Government must ensure that the large sum of public funding allocated to the farming and land use sectors is used in effective and targeted ways to secure the scale of change needed in the face of a nature and climate emergency.**

Decisions made about the use and management of publicly owned land e.g. on the National Forest Estate or land owned by local authorities, could also be significant in contributing to land use change at scale and by demonstrating what is possible and desirable.

Productivity

13. Would incentives for farm plans specifically targeting flock/herd health, soil health, & crop health (for example) demonstrate real improvements in productivity over time?

Please explain your answer

Farm plans are a first but important step in delivering change; they are needed to help farmers and crofters transition to low carbon and nature positive farming. Providing financial support and advice to farmers to help them produce plans is justified. **The farm plans themselves will only result in improvements over time though if farmers implement the actions identified in them.** Whether this happens or not is likely to depend on a range of factors including: the financial viability of taking action; the level of knowledge and skills of the farmer; and, the availability of advice and training. It is appropriate for government to provide financial incentives to support action identified in plans where this helps to deliver public benefits; this will especially be the case for action that helps nature or improves the environment. The rationale for using public funds to deliver improvements in farm productivity is less clear since the benefits e.g. from increased yields, are largely private ones accruing to the farm business. Government needs to be clear why it is providing financial support to the sector and for what purposes and outcomes.

14. Should future support be dependent on demonstration of improvements in productivity levels on farm?

- a. Yes
- b. No ✓**
- c. Don't know

B. If so, how would this be measured?

No, future support should be dependent on delivering positive environmental outcomes and helping farmers to improve the profitability of their businesses.

Research & Development

15. In light of ongoing research activities supported by the Scottish Government and the 2022-2027 research strategy, are additional measures needed to ensure research is supporting the agriculture sector to meet its climate change targets?

- a. Yes ✓**
- b. No
- c. Don't know

B. If yes, please specify

There is nothing in the research strategy that will help to improve the development and expansion of agro-ecological farming systems including - but not exclusive to - organic farming, that have climate and nature benefits. **Greater research effort overall should be focused on identifying what more sustainable farming and food production systems look like and how they could be encouraged.**

Knowledge & Skills

16. What importance do you attach to knowledge exchange, skills development and innovation in business?

Please explain your answer

Knowledge and skills are of high importance and developing these requires greater investment and focus by the Scottish Government in future to **help the farming and land use sectors transition to more sustainable business models that deliver for nature and climate.**

17. What form should tailored, targeted action take to help businesses succeed?

Please explain your answer

Farmers and other rural land management businesses would benefit from a wide range of help including:

- **Knowledge transfer** and innovation support
- Information and **advisory services** – 1:1 and 1 to many provision
- **Training and skills development** and support for apprenticeships

18. Should continuing professional development be mandatory for businesses receiving public support funding?

- a. **Yes** ✓
- b. No
- c. Don't know

Please explain your answer

If the Scottish Government intends to invest in training and skills development in the farming and land use sectors in the first place then ensuring continuing professional development seems logical. One way to ensure this happens would be to make it mandatory for businesses receiving public funding.

Supply Chains

19. How can the green credentials of Scottish produce be further developed and enhanced to provide reassurance to both businesses and consumers?

Please explain your answer

By encouraging an increase in organic farming - which can deliver both nature and climate benefits -and an increased supply in Scottish organic produce. Only a very small percentage of Scottish farmland is currently managed organically yet the demand for organic produce is growing. Organic farming has many strengths. It is a system of farming which is: underpinned by regulation; the standards producers must adhere to are independently inspected and verified; and, the produce from organic farms is certified and carries a logo that is recognised by consumers. Together, these elements combine to provide reassurance to other food businesses and consumers about the green credentials of organic produce.

Beyond organic farming, much greater effort is needed to transition to low carbon and nature positive farming and crofting in Scotland for all types and systems of farming. This requires public investment - in many of the ways outlined in answers to this consultation - and government to undertake proper evaluation of the impacts and outcomes of such investment.

Requiring farm level data collection, and collating this at national level, would support evaluation of public investment and enable the government to measure progress in relation to nature, climate and other targets. Communicating this would enable other businesses in the supply chain, the public and consumers to better understand the environmental performance of Scottish agriculture and to have confidence in Scottish produce or demand improvements where performance is less than desired.

As noted in the consultation document, the challenge of reducing emissions and enhancing biodiversity needs to be recognised by the whole food supply chain, not just by primary producers, and actions need to be identified that will help whole supply chains make progress. A greater focus on developing shorter supply chains would help bring producers closer to consumers and build confidence and understanding and, ultimately, provide reassurance about standards of production being met.

20. Should farm assurance be linked to requirements for future support?

- a. Yes
- b. **No** ✓
- c. Don't know

Please explain your answer

It might depend what farm assurance schemes are meant here and the extent to which adherence to the standards within such schemes e.g. British Farm Standard, would achieve the necessary climate and nature outcomes. From an environmental perspective, **many assurance schemes require little more than compliance with baseline regulation i.e. minimum standards**, and focus more on animal welfare, food safety or other standards than those that would lead to environmental improvements. Making membership of such schemes a requirement for future support does not appear to be the best way to make progress.

21. How can ongoing data capture and utilisation be enhanced on Scottish farms and crofts?

Please explain your answer

See responses to Questions 1, 2, 3 and 4.