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Mr Pete Ritchie
On behalf of
Scottish Environment LINK Food and Farming
Group
Nourish Scotland
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28 March 2022

Dear Pete,

NFUS REQUEST FOR SUSPENSION OF CURRENT GREENING RULES

Thank you for your letter of 8 March. Like you, I am shocked and immensely saddened at the events unfolding in Ukraine. The Scottish Government, along with the people of Scotland, stands in solidarity with the people of Ukraine. We are having to navigate our way through extraordinary times, with much uncertainty. I share your concerns over future food production and supply and you can be assured that the Scottish Government is urgently considering how it responds to all the impacts of the invasion of Ukraine, not least the potential impact on food production and the wider food supply chain. As part of this, we will of course be considering how we might best use any relevant, available flexibilities and levers to achieve the best outcomes we can.

The Scottish Government remains clear in its commitment to supporting farmers and crofters to produce more of our food more sustainably, nevertheless we must continue to acknowledge the need for change and to make sure that agriculture continues to play its part in cutting emissions, mitigating climate change and restoring and enhancing nature and biodiversity.

In this context, I have considered your request seeking a temporary suspension of Ecological Focus Areas (EFAs) requirements, specifically the fallow and margins options, and I have a number of concerns and observations. Greening is an important aspect of the Basic Payment Scheme and an important element for the sustainability of farming businesses, including environmental sustainability. I believe it is important that we maintain and enhance such measures and not scale back our efforts.

I see no reason to change the requirement on those wishing to claim Greening payments to maintain 5% of their arable land in (EFAs). There are a number of options open to farmers and crofters to do this, not simply the ones relating to fallow or field margins. Should those participating in greening wish to increase cropping area and continue to receive their Greening payments, they could choose other options to fallow such as Green Crop Cover or Catch

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Crops. In addition, I would note that there is currently nothing to stop any farmer voluntarily putting all their land into food production now, although I would underline the importance of continuing to participate in the Greening scheme and in working together to deliver a sustainable farming sector. I am also concerned about potential changes to Greening at such a late stage this year in terms of the delivery of the payment strategy and the potential impacts on all farmers and crofters of that.

It is for these these reasons that my decision is not to make changes to EFA requirements but encourage participants in Greening to consider the best approach for their individual businesses to balance production needs and Greening support. Lowering emissions and enhancing biodiversity and nature will ultimately help make our food system more resilient, that is why it is essential that we keep the measures we do have and enhance them where possible.

Accordingly, I would welcome SE LINK's assistance in ensuring all the necessary information is available to all farmers and crofters so they can consider the best approach for their individual businesses to balance production needs and greening support.

Of course, one of the other challenges being faced by farmers as a result of the events in Ukraine and Russia is the impact on fertiliser prices and availability. Managing nutrients and understanding fertiliser requirements has never been so important so support for soil testing and nutrient management planning across Scotland under the National Test Programme should give tangible benefits to farmers.

I know you will also be aware of the Food Security and Supply Taskforce that met for the first time on 18th March.

The Taskforce will monitor, identify and respond to any potential disruption to the food and drink supply chain resulting from the impact of the war in Ukraine. It will also seek to recommend any short, medium and longer term actions that can be taken to mitigate impacts, resolve supply issues and strengthen food security and supply in Scotland. This will include actions to be taken by business and Government.

The taskforce will draw on technical and scientific knowledge and expertise from across a range of sectors, agencies and organisations. It will also consider any future structures and policy measures needed to monitor, address and strengthen food security and supply in Scotland.

Your letter raises a number of very important questions and challenges relating to agricultural production, food supply and delivery of environmental benefits. I would welcome a wider discussion on these issues with SE LINK and other agricultural and environmental stakeholders around the need for sustainable food production while delivering for nature and ensuring our food security. I look forward to arriving at a practical solution that means agriculture in Scotland can produce sustainable, nutritious food while contributing to our shared climate and biodiversity objectives in these times of uncertainty.

Yours sincerely,



Mairi Gougeon

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