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Mairi Gougeon MSP
Cabinet Secretary for Rural Affairs and Islands
Scottish Government

March 9th, 2022

Dear Cabinet Secretary,

We are writing to you in the context of the shocking, ongoing acts of aggression against Ukraine and the resulting impact upon global food production. This is clearly a tragic situation and all of us stand in solidarity and support for the people of Ukraine.

This letter is a direct response to related comments from NFU Scotland, as reported on BBC Scotland's *Good Morning Scotland* radio programme on Tuesday, March 8. According to the report, the NFUS is calling for the temporary suspension of greening rules, specifically around Ecological Focus Areas, so that more land can be made available for crop production.

We are aware of similar discussions at an EU level, with calls for what would amount to a rolling back on sustainable food policy objectives within the EU Farm to Fork and Biodiversity strategies.

Scottish Environment LINK Food and Farming group members are deeply disappointed to see farming unions both in Scotland, and the UK, arguing for the lowering of environmental standards using the dubious pretext of food security.

Their argument is flawed for several reasons. Firstly, there is no shortage of wheat, with stocks at 37% of annual usage, despite poor harvests in North America last year. The FAO predicts average or above-average yields of wheat and of total cereals this year. No-one knows at this stage how the conflict will affect exports.

Secondly, we know that almost 80% of our cereal harvest in Scotland is used for alcohol production or animal feed. Around two-thirds of the EU cereal harvest is used for animal feed or biofuel. Feeding grain to animals (even the most efficient ones) means converting 3 or 4 units of human edible calories or protein to 1 unit. We can 'afford' to do this because there is no shortage of cereals.



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Thirdly, we know that tackling the climate and nature emergency is the only way to ensure long-term food security. The poor harvest in North America last year was caused by drought, while this was counterbalanced by good harvests in India and Australia. As the climate becomes more chaotic, the risk of multiple harvest failures in different parts of the world increases.

Finally, the current lobbying is based on the false premise that farming and nature are a zero-sum game. Scotland is committed to becoming a world leader in sustainable and regenerative agriculture. The way forward – for Scotland, for Europe, and globally is farming **with** nature.

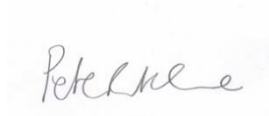
The real lesson of this crisis is that we must look at the resilience of our food and farming systems. More than ever, we must shift towards environmentally friendly farming practices, such as agroecology, organic farming, and agroforestry, which provide the only path to ensure long-term food security, food sovereignty, and the overall sustainability of food systems.

Simply growing more grain is not the answer. We need to think about the use and costs of nitrogen-based fertilisers and focus instead on the ways in which we can fix nitrogen naturally, and how we can use grass and food waste rather than wheat for animal feed.

We should maintain and improve Ecological Focus Areas, not drop them. We should be adopting a strategic approach to land use, and the current atrocities in Ukraine should not be used as an excuse to undermine efforts to tackle the twin climate and nature emergencies.

We encourage you to hold to the vision statement published last week and continue to support nature-friendly, climate-friendly farming in Scotland. We would be more than happy to discuss these issues with you directly, and in more detail, if you have the time to do so.

Best regards,



Pete Ritchie

Convenor of
Scottish Environment LINK Food and Farming Group



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