



Agriculture Bill

Consultation response, Dec 2022

Introduction to Scottish Environment LINK

Scottish Environment LINK is the forum for Scotland's voluntary environment community, with over 40 member bodies representing a broad spectrum of environmental interests with the common goal of contributing to a more environmentally sustainable society.

Its member bodies represent a wide community of environmental interest, sharing the common goal of contributing to a more sustainable society. LINK provides a forum for these organizations, enabling informed debate, assisting co-operation within the voluntary sector, and acting as a strong voice for the environment. Acting at local, national and international levels, LINK aims to ensure that the environmental community participates in the development of policy and legislation affecting Scotland.

LINK works mainly through groups of members working together on topics of mutual interest, exploring the issues and developing advocacy to promote sustainable development, respecting environmental limits. This consultation response was written by LINK's Food & Farming Group.

1. Response

1. Future Payment Framework

1. Do you agree with the proposal set out above, in relation to the Agriculture Bill including a mechanism to enable payments to be made under a 4 tiered approach?

Yes

Please give reasons

Scottish Environment LINK and the Farm for Scotland's Future campaign support the Government's vision and desired outcomes and especially welcome the emphasis on nature restoration as well as climate mitigation. The aspirations contained within the vision are achievable but will require an ambitious approach to the design and implementation of the new system of agricultural support. A report from WWF Scotland has highlighted that policy measures currently proposed to reduce emissions get us less than halfway to where we need to be for Scotland to remain on track to reach net zero by 2045. There is, as yet, no assessment of the level of action needed to meet the global nature targets, expected from COP15 and Scotland's Natural Environment Bill in 2023. Nevertheless, given the state of nature on Scotland's Farmed habitats (State of Nature Scotland report 2019), policy measures required to meet them will be substantial.

We understand that the new system of farm funding will be based on a 4 tiered approach, and accept that it is possible for such a system to deliver the necessary change. However, we remain concerned about the heavy emphasis on Direct Payments, which will not deliver for nature and climate as this system must.

2. Do you agree that Tier 1 should be a 'Base Level Direct Payment' to support farmers and crofters engaged in food production and land management?

No

Please give reasons



LINK has significant concerns about the heavy emphasis on Direct Payments, even with conditionality attached. Most funding – at least 75% – must directly support methods of farming that deliver for nature and climate. This will require funding to be prioritised on Tiers 2, 3 and 4, where it must support effective interventions. Within the Direct Payment envelope, a majority must be spent on Tier 2 (enhanced payments) to deliver results.

Over time, the new system must transition away from providing any support for practices that are incompatible with a healthy environment. This will be achieved by phasing out all funding for Tier 1 (Base payments) over the term of the next parliament (2026-30) in order to move money into Tiers 2, 3, and 4.

In the interim, recipients of base payments must meet core sustainability standards and must be required to produce Whole Farm Plans. The development and implementation of these plans needs to be well resourced by the Scottish Government. Active farmers/crofters should be expected to meet certain basic requirements in addition to GAEC – for example, periodic soil testing, animal health and welfare plan, nutrient budget, carbon and biodiversity audits – and to upload that data annually to a government portal. They should also be expected to undertake CPD. We also support the inclusion of a provision relating to public access rights as an essential standard required to be met. This should be mapped on the proposed Whole Farm Plans, showing formal and informal paths, gates, parking areas, fencing and other elements relating to access.

The system of base payments should be designed to be redistributive and should not reward large landowners simply because of the size of their ownership. This payment should provide a form of income support for small to medium sized farms and crofts, especially those in the more agriculturally and economically disadvantaged parts of Scotland. The amount of support any farm can receive under this payment should be capped. Eligibility for this payment should not be a requirement for support under Tiers 2 and 3.

3. Do you agree that Tier 2 should be an ‘Enhanced Level Direct Payment’ to deliver outcomes relating to efficiencies, reducing greenhouse gas emissions and nature restoration and enhancement?

YES

Please give reasons

In order to meet the Scottish Government’s legislative targets to reduce greenhouse gas emissions, and upcoming legislative targets to restore nature, it is necessary to change the way in which we farm. Tier 2 must support nature- and climate-friendly farming, with outcomes ambitious enough to meet our legislative targets.

The Vision for Agriculture sets an ambition to ‘encourage more farmers to farm and produce food organically’. A specific target should be set to reach 10% of land farmed organically by 2030, with this change driven by the new system. This target should be included in the Agriculture Bill.

The Vision for Agriculture includes ‘integrating trees on farms’. Modelling by Soil Association/Cumulus suggested that a modest allocation (in range of 1-5% of Scottish farmland) would mean an extra 342,000ha of woodland and trees outside woodland could be created by 2050, with wide benefits. Integrating trees on farms can provide a range of benefits to both farmers and wider society, as well as significant ecosystem services. Future policies need to acknowledge these benefits and funding mechanisms need to be appropriate to support trees on farms projects at all scales including: management of existing farm woodlands, integration of trees with crops and livestock as well as hedgerows, copses and buffer strips part of a well planned agroforestry system.



The Vision for Agriculture aims to “minimise, reduce and remove the use of agrochemical inputs”. The new payment system should incentivise a shift to low-input production. This could fall under basic standards for the Base Payment, or under the Enhanced Payment, based on reduced usage of N fertiliser and chemical pesticides. Targets should be aligned with Farm to Fork, with a target of a 20% reduction in N fertiliser, 50% in pesticides, and 50% in antimicrobials. These targets should be included in the Agriculture Bill.

Farmers and crofters should be supported to create and maintain nature rich habitats, such as through enhancing field margins. The system should incentivise farmers and crofters to work together to deliver benefits of nature through contributing to wider “Nature Networks” - for example, by coordinating placements of hedgerows, wildflower meadows, and other wildlife corridors. Space for nature can be created on productive land, and farming methods which promote biodiversity without taking land out of production entirely, such as agroecology and regenerative grazing, should be supported.

Land managers have a legal duty under the Land Reform (Scotland) Act 2003 to respect access rights. Any new scheme could also include funding for farmers to leave wide field margins which will benefit nature and public access as well as creating a buffer against diffuse pollution. We suggest margins of five metres. Currently if farmers leave a field margin this can conflict with other outcomes and it is important that this is resolved in the new programme. For example, under the existing programme, if a farmer fences off a path running along a field margin to enable the public to walk through their land more easily and reduce disturbance to livestock, this can lead to a reduction in the basic farm payment as this land has been taken out of production. At the same time, farmers being paid to sow wildflowers on field margins or leave them unsown to protect ground nesting birds are in conflict with access rights which exist on all margins. Therefore, including a provision for wide margins would allow an informal path network to be developed on margins which are wide enough to accommodate both access and other measures. In some cases, the public could be directed to use specific margins in a field by the simple measure of them being mown, compared to others which will have higher, wetter vegetation and be less attractive for walkers, leaving them free for nature to benefit.

Eligibility for Tier 2 should be conditional on meeting basic standards. For example, with the exemption of on land where tree planting is not feasible, all farms receiving Tier 2 payments should have some trees on their land. Farms with peatland should be expected to have this in good condition or to be actively working towards restoration. As a minimum, where a farm has degraded peatlands, this portion of their land should be disregarded from consideration for funding.

4. Do you agree that Tier 3 should be an Elective Payment to focus on targeted measures for nature restoration, innovation support and supply chain support?

YES

Please give reasons

Building on the action taken for nature through Tiers 1 and 2, a new Nature Restoration Scheme should be introduced under Tier 3 to enable agriculture to make its contribution to reversing nature loss. This action should support farmers to undertake the creation and restoration of specific habitats such as wetlands, heath, habitat mosaics, species-rich grassland, as well as species and habitat specific management. Creating a network of semi-natural habitats across our farmland will provide a huge benefit in ecosystem services including pollination, natural pest control, protection from extreme weather such as floods and fires, as well as giving Scotland’s species a greater chance of adapting. We want the right habitats in the right places and for any scheme to offer equitable payments for different habitats. Strategic habitat creation linked to nature networks with ambitious catchment-based projects would be welcome.



This funding stream is envisaged as the main delivery mechanism for the management, restoration and enhancement of functioning ecosystems throughout the country. These options should have the scope to generate a significant and wide range of public goods. These should include improved water quality, flood prevention, carbon sequestration and storage, biodiversity and landscapes.

This funding stream will be the primary source of funding for priority species, habitats and the management of designated sites and protected areas.

This scheme should operate with longer term timescales (10 years recommended) and should have a significantly enhanced level of ambition compared with previous agri-environment schemes. Where possible, options should have an element of outcomes based, targeted funding with scope for land managers to take the lead on delivering successful outcomes.

These competitive interventions could include (but not limited to):

- Species-specific management (e.g. for corncrake, chough, waders)
- Management of specific habitats such as wetland, heath, habitat mosaics, species-rich grasslands
- Specialist moorland management plans
- Creation/restoration of specific habitats such as species-rich grassland, wetland, peatland, floodplain, coastal saltmarsh
- Agroforestry initiatives (as a supplement to the delivery of trees on farms, which should take place primarily under Tier 2)
- Conservation grazing
- Management of invasive non-native species
- Nature led ecosystem restoration (rewilding)
- In circumstances where human-wildlife conflict arises, or may arise, rewarding intervention using an approach derived from the international consensus principles for ethical wildlife control
- Instream/river and on-land interventions to mitigate flooding and to manage sediment for water quality
- Education infrastructure, events and service
- Catchment scale water quality and habitat restoration

5. Do you agree that Tier 4 should be complementary support as the proposal outlines above?

YES

If so what sort of Complementary Support do you think would be best to deliver the Vision? Please give reasons

Scotland's farming sector, like all business sectors, requires investment in skills and preparing for change. This means upscaling farm advisory services and ensuring they are able to meet an increasing demand for on farm advice. A well-funded and targeted advisory service is a top priority. It should be underpinned by knowledge transfer opportunities for peer-to-peer learning, as well as investment in training opportunities. Successful action for nature and climate must be done at scale: support should be available to farmers to be able to collaborate, through advisors and networking initiatives, to coordinate across larger, catchment scale areas.

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For example, support such as knowledge sharing, meadow-matching for green hay, sharing equipment (eg. cut and collect machinery), and shared ways of dealing with arisings would support a strategic focus on species rich grassland creation for carbon sequestration and biodiversity.

There must be much more investment in advice, knowledge exchange, research, and CPD to support the transition to nature-friendly and climate-friendly farming. Scotland needs a bigger and more diversified Rural Advisory Service to provide new jobs, training and skills, that supports sustainable land use. Maximising our land's potential requires a skills, knowledge and advice revolution, with investment in upskilling and training for sustainable land use change, bringing with it more rural job opportunities.

Training and employment of more farm advisors that understand both farming and wider land use challenges, via a bigger and more diversified Rural Advisory Service, would provide effective outreach to farmers and land-managers. Farmers must have access to advice that is professional, objective and evidence-based from advisors who are competent to deliver this. CIEEM in collaboration with Plantlife has developed a Farm Environment Advisor Competency Framework with sixteen areas of competency for farm advisors.

<https://cieem.net/resource/farm-environment-adviser-competency-framework/>

Rural job opportunities would also be boosted by a diversified service, with potential for a rural skills and jobs matching scheme, including financial support for wages. This should target those who are unemployed, underemployed or who are at risk of unemployment as a result of the current economic crisis – and offer upskilling, reskilling and skills diversification opportunities.

Funding must be allocated to carry out effective monitoring and evaluation of all farm support payments, including establishing baseline data, assessing impacts and outcomes and reporting on progress.

Capital funding should be used to offer low cost or no-cost loans to farmers looking to invest in new equipment that will save businesses money in the long term (i.e. upgrades to machinery). The Scottish Government should encourage cooperatives or machinery rings to purchase these items collectively; this would avoid duplication in investment and has the potential to facilitate greater cooperation at landscape scale.

Loans and grant funding put in place by the Scottish Government should have baseline and monitoring activities attached. Advice and training could also be used as a form of conditionality, to assist upskilling, and help farmers and land managers comply with new regulations.

Match funding should be used for grants/loans that will generate financial or other business benefits on farm. The requirement for match funding should be aligned with the level of private benefit that will be generated from capital funding. This would ensure that a greater % of spend can go to farm businesses and land managers who would find funding to be otherwise prohibitive (smaller-scale farmers, new entrants). Means testing should be considered where match funding would be prohibitive e.g. new entrants or small scale agroecological farmers.

Although these are proposals that come under legislation titled 'Agriculture Bill' we understand that this Bill is about broader land use and land management, including woodland expansion and management, and peatland restoration. The Scottish Government should consider a more appropriate title for the bill such as the Agriculture and Land Management Bill to demonstrate that the legislative framework is about integrated land management in line with the Scottish Government's Land Use Strategy. We understand that the Forestry Grant



Scheme payments would sit under this tier. There should be clear links between this tier and the Forestry Strategy for Scotland and the vision for forestry and land use in Scotland.

6. Do you agree that a 'Whole Farm Plan' should be used as eligibility criteria for the 'Base Level Direct Payment' in addition to Cross Compliance Regulations and Greening measures?

YES

Please give reasons

LINK believes that Whole Farm Plans should be a requirement for funding across all Tiers, with an appropriate level of planning for each level. This plan would be practical and relevant, and would ensure that the environment underpins all aspects of planning. This would be based on the following:

- Plans are based on the priorities of the individual holding, guided by local, targeted priorities.
- Plans delivered by suitably qualified, skilled advisers and farmers / land managers with appropriate skills.
- Plans are produced with an emphasis on land manager input and involvement to promote ownership of the desired outcomes.
- The planning approach makes effective, efficient use of a single, integrated IT platform that holds relevant, holding level, information based on an online mapping tool.
- Measures to support land managers with implementation of plans – particularly access to ongoing advice and support - are available.

Lower Tiers

Advisory support for lower tiers of funding should focus on a basic plan requirement. This basic plan would utilise information on workable integrated IT platform. It would focus on farmer self-assessment linked to a compulsory training requirement. This would involve 'one-to-group' advice linked to the relevant needs of the land use type. This could include attendance at farmer meetings, monitor farms themed events, and online training events. It should be linked to a compulsory CPD requirement.

Upper Tiers

The production of detailed plans should initially focus on those seeking higher level support payments. All financial support for upper funding tiers should require the production of an environmental plan covering habitat, species, peatland status, woodland condition, water quality, carbon/greenhouse gas emissions and soils. The plan would include a comprehensive assessment of all aspects the holding's environment and underpin any application for funded management. It should draw on previous plans such as agri-environment, Integrated Land Management Plans (ILMPs) and whole farm plans.

The plan would be based on existing information, data and local priorities, and would be combined with a walkover survey and land manager discussion. Priorities for the next 10 years would then be agreed with the land manager. The plan would be based on local / regional priorities set by RLUPs (or similar) and be well integrated with land manager priorities and farm type / farm environment.

The development and implementation of the plans needs to be well resourced otherwise these won't work.

7. Do you agree that the new Agriculture Bill should include a mechanism to help ensure a Just Transition?

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YES

8. Do you agree that the new Agriculture Bill should include mechanisms to enable the payment framework to be adaptable and flexible over time depending on emerging best practice, improvements in technology and scientific evidence on climate impacts?

YES

9. Do you agree that the new Agriculture Bill should include mechanisms to enable payments to support the agricultural industry when there are exceptional or unforeseen conditions or a major crises affecting agricultural production or distribution?

YES

2. Delivery of Key Outcomes: Climate Change Adaptation and Mitigation

1. Do you agree with the proposal set out above, in relation to the new Agriculture Bill including measures to allow future payments to support climate change mitigation objectives?

YES

Do you have any views on specific powers and/or mechanisms that could support such alignment? Please give reasons

Agriculture is Scotland's third largest source of Greenhouse Gas emissions, yet emissions from farming have fallen at a significantly slower pace than almost all other sectors. Business as usual is not an option. Environmental security underpins food security, and climate change is already having an impact on farming, with extreme weather and water shortages impacting food production. In 2017 alone extreme weather contributed to losses of up to £161 million for Scotland's farmers (WWF).

To ensure that the new farm funding system adequately responds to the need to reduce emissions, the Bill should commit to future payments schemes being subject to independent advice and scrutiny, which should measure the impact of payments against emissions reduction targets.

2. Do you agree with the proposal set out above, in relation to the new Agriculture Bill including measures to allow future payments to support climate change adaptation objectives?

YES

3. Do you agree with the proposal set out above, in relation to the new Agriculture Bill including a mechanism to enable payments to be made that are conditional on outcomes that support climate mitigation and adaptation measures, along with targeted elective payments?



YES

4. Do you agree with the proposal set out above, in relation to the new Agriculture Bill including measures that support integrated land management, such as peatland and woodland outcomes on farms and crofts, in recognition of the environmental, economic and social benefits that it can bring?

YES

Please give reasons

Yes, if this is done with due consideration of the habitats and species already present on the site and in the local area. For example, woodland creation is not suitable for all sites if other valuable habitats and associated species are already present locally. In light of the significant losses and carbon storage capacities of species rich grassland this habitat should also be included.

The future support system must support integrated land management rather than treat different land uses in silos as the current system encourages. With this in mind, we suggest that the name of the Bill should be broadened to reflect the proposals to make payments for forestry and peatland restoration within the scope of the bill.

Integrated land management should see species-rich grasslands recognised for their important role in tackling climate change and boosting biodiversity. This is a real opportunity to help meet the vision of a framework that delivers high quality food production, climate mitigation, adaption and nature restoration – and also will help to achieve actions set out in the Scottish Pollinator Strategy and wider Biodiversity Strategy.

2.1 Nature Protection and Restoration

1. Do you believe the new Agriculture Bill should include a mechanism to protect and restore biodiversity, support clean and healthy air, water and soils, contribute to reducing flood risk locally and downstream and create thriving, resilient nature?

YES

2. Do you believe the new Agriculture Bill should include a mechanism to enable payments that are conditional on outcomes that support nature maintenance and restoration, along with targeted elective payments?

YES

Please give reasons

Yes, but payments should not just support maintenance and restoration they should incentivize creation of habitat. Habitat creation should contribute to nature networks, including existing mapped opportunities such as B-Lines ([B-Lines - Buglife](#)) and Important Plant Areas. Payments made to support nature maintenance should reflect the longevity of maintenance requirements.



High deer population densities are a threat to nature maintenance and restoration. Payments should be conditional on having sustainable deer densities, and for those densities to be included in the GAEC.

3. Do you believe the new Agriculture Bill should include a mechanism to enable landscape/catchment scale payments to support nature maintenance and restoration?

YES

Please give reasons

Nature restoration requires scale and connectivity, allowing species to have adequate habitats and to move across the landscape. Agriculture's contribution to nature restoration should include cooperation across farms to deliver landscape scale change and to contribute towards Nature Networks.

Any future payment scheme needs to ensure landscape scale management. There is a need for integrated support for work in and out of woodlands which is relevant for deer and INNS. That means that mechanisms are needed to enable collaboration, landscape scale planning and management, across different land uses. For example we know that to be successful, rhododendron ponticum eradication needs to be done at catchment scale and the payment options need to be available long-term and inside and outside the woodland, with an integrated land use payment option rather than having to apply for a forestry grant scheme for the forested land and an agricultural payment for non-forested or agricultural land.

2.2 High Quality Food Production

3. Do you believe the new Agriculture Bill should include a mechanism to enable payments that support high quality food production?

DON'T KNOW

Please give reasons

High quality food production has not been defined for this context. If payments are to be made on this basis, it is essential that it is defined and that recipients are meeting a minimum set of environmental and animal welfare standards. Pre-existing certification schemes could be used as a benchmark for this work.

2.3 Wider Rural Development

1. Do you agree that the proposals outlined [above](#) should be included in the new Agriculture Bill?

YES

Please give reasons

LINK is pleased to see the inclusion of "Activity in and financial support for public access and the understanding of land use" within this part of the consultation.



Land managers have a legal duty under the Land Reform (Scotland) Act 2003 to respect access rights. Therefore they should be supported to facilitate public access on their land as this is a public good which often is for the benefit of their local community or the population more widely, rather than bringing specific benefits to the individual farmer. Support could happen through the creation of a programme along the lines of the existing Improving Public Access scheme which provides funding for creating and maintaining paths and other infrastructure. This enables more people to get outdoors, to enjoy and learn about nature as well as improving their own health and wellbeing.

The proposals and context for this section and not making a direct reference to the skills shortages currently experienced in the rural sector. The skills shortages in the forestry sector for example are undermining the delivery of net-zero targets, as has been set out by the Institute of Chartered Foresters (<https://www.charteredforesters.org/resource/cant-see-the-skills-for-the-trees-critical-shortages-in-forestry-workforce-skills-put-climate-targets-at-risk>). This omission should be corrected in the Bill and specific provisions should be made to help address the skills shortages. The report linked in this response makes recommendations for improvements. The skills shortages in the forestry sector are not addressed in section C, which is mostly focused on skills in the agriculture sector, however since the bill is about wider rural development and the restoration of native woodlands and forestry are key growth areas for the Scottish Government this omission should be addressed.

2. Are there other areas relating to non-agricultural land management such as forestry that you would like considered for support under the Agriculture Bill to help deliver integrated land management and the products produced from it?

Yes, but we would need further details to understand how being part of Tier 4 impacts the future Forestry Grant Scheme. LINK members would like to see the following considerations taken into account when the new FGS is designed:

- The FGS should be rebalanced to include greater emphasis on management of existing woods, with targets and budgets to match.
- Deer control remains an issue. With significant funds spent on fencing, we recommend that the drain on the FGS budget is progressively reduced and the balance allocated to underfunded options and deer culling.
- Any future schemes will also need to be enabled and designed to address issues that impact forestry and woodlands outside of forested land, such as rhododendron ponticum and sitka seeding into open ground.

The FGS should also be made more accessible for customers, support the tree nursery sector development, address the workforce and skills shortages.

The Bill should also include support for the management of areas that are primarily for nature conservation, rather than agricultural production such as designated sites (SSSI, Local Wildlife Sites) and NGO-owned land including practices such as conservation grazing with rare breeds.

2.3.1 Animal Health and Welfare

1. Do you agree that the new Agriculture Bill should include powers to establish minimum standards for animal health, welfare as a condition of receiving payments?

Yes



2. Do you agree that the new Agriculture Bill should include powers to make payments to support improvements in animal health, welfare and biosecurity beyond legal minimum standards?

Yes

Please give reasons

It should also seek to reduce the impacts of veterinarian meds on the environment such as promoting the safe use of ivermectin (applying only when needed, weigh animal being treated to ensure correct dosage and put animal out 10 days after treatment) to minimise risk to dung beetles and other wildlife.

It should seek to increase biosecurity measures in agriculture, including awareness and monitoring as a means to reduce the impact of invasive non-native species.

3. Do you agree that the new Agriculture Bill should include powers to collect and share livestock health, welfare and biosecurity data?

Yes

Please give reasons

This would increase monitoring of veterinary medicine usage and biosecurity measures/breaches including discovery of invasive non-native species. The powers should be supported by funding to ensure sufficient monitoring and enforcement.

2.3.2 Plant Genetic Resources and Plant Health

1. Do you agree that Scottish Ministers should have powers to provide support for the conservation of Plant Genetic Resources, including plants developed and grown for agricultural, horticultural or forestry purposes and their wild relatives?

Yes

Please give reasons

The reduction of live plant and tree imports is the single most effective biosecurity measure that can be implemented for the benefit of existing and future plants and other wildlife. We need to reduce our reliance on imports of plants and trees to tackle this threat posed by invasive non-native species. Scottish horticultural, arboricultural and silvicultural industries should receive increased support and investment to enable domestic production to satisfy demand, growing in Scotland rather than importing plant products and their hitchhikers from elsewhere in the world.

Plant genetic resources (the diversity of crops, their varieties, and wild relatives) are essential for resilient agriculture, food, nutrition, and economic security. The survival of plant genetic resources is dependent on farmers, researchers, and plant breeders to diversify and improve our crops to provide resistance to the climate and nature crises.



2. Do you agree that Scottish Minister should have the power to provide support to protect and improve plant health?

Yes

Please give reasons

The transition to a domestic industry must be supported by a comprehensive public facing campaign to raise awareness of the threats posed by pests and diseases, and the need for biosecurity to build demand for domestically grown goods. This must be accompanied by measures to improve the transparency of the origins of products, including detail on growing condition and treatments. Support to improve plant health must also include a halt to use of peat in horticulture and reduce the reliance on use of pesticides.

In addition, climate change is threatening both cultivated and wild plant genetics due to changing environmental conditions, increase in extreme weather events, presence of invasive non-native species, and other plant related pests and diseases.

3. Skills, Knowledge Transfer and Innovation

1. Do you agree that support should continue to be provided in [this area](#)?

YES

Please give reasons

Delivering the Scottish Government's vision for agriculture will require substantial changes in farming practice and land use. In order to do this effectively, and in line with the principles of a just transition, farmers and crofters must be supported not just financially but through investment in skills, knowledge transfer and innovation.

2. Is there any particular gaps in delivery that you can identify?

YES

Please give reasons

The level of investment must be increased to meet the scale of change required. LINK supports the recommendations of the Climate Emergency Response Group to realign and upscale the Farm Advisory Service, including through focused investment in Continuous Professional Development on climate mitigation, adaptation and nature for all existing farm advisors. There should be more expert advisors, training, CPD on integrated pest-management (IPM).

4. Administration, Control, and Transparency of Payment Framework Data

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1. Do you agree that Scottish Ministers should have the power to create a system that provides for an integrated database, to collect information in relation to applications, declarations and commitments made by beneficiaries of rural support?

Yes

Please give reasons

Data is essential to ensuring that farmers, crofters and land managers are best informed to produce high quality, sustainable food on their land while also making meaningful changes for nature and climate. Data is needed to understand the progress being made to achieving national goals and ensure that the measures being undertaken are having the desired effect.

7. Do you agree that Scottish Ministers should have the power to create a system that would provide for cross compliance, conditionality that covers core standards in relation to sustainable environment, climate, Good Agricultural and Environmental Condition (GAEC), land, public and animal health, plant health and animal welfare, Soil health, carbon capture and maintenance?

Yes

Please give reasons

This is vital to make sure that Tier 1 fulfils the Scottish Government's stated aims.

12. Do you agree that technical fixes should be made to the Agriculture and Retained EU Law and Data (Scotland) Act 2020 to ensure Scottish Ministers have all requisite powers to allow CAP legacy schemes and retained EU law to continue to operate and be monitored and regulated and also to ensure Scottish Ministers have flexibility to better respond to current, post exit, circumstances?

YES

Please give reasons

LINK would expect the Scottish Government to be able to keep pace with EU law and policy.

Assessing the Impact

2. Are you aware of any examples of potential impacts, either positive or negative, that you consider that any of the proposals in this consultation may have on the environment?

The use of maps such as Buglife's B-Lines to strategically target landscape scale habitat delivery, particularly in tier 2 & 3, would help maximise the benefits of this habitat in delivering Nature Networks and contribute to the delivery of the 30 x 30 commitment. Any measures to encourage the reductions in usage of pesticide, herbicide, artificial fertiliser and veterinary meds would also be beneficial to biodiversity and as a consequence to soil & water health.

Tree planting schemes need to involve botanical surveys and professional consultation to ensure that the right trees are planted in the right places and not to the detriment of other valuable habitats. In some instances a site may be more suitable for the creation or enhancement of another habitat type, such as species rich grassland,



peatland or heathland rather than tree planting. The availability and connectivity of habitats within a landscape, identified using habitat maps such as B-Lines, needs to be taken into account when considering where to locate tree planting.

7. Are you aware of any examples of how the proposals in this consultation might impact, positively or negatively, on island communities in a way that is different from the impact on mainland areas?

A comparison of the distribution of recent farm support payments with the occurrence of High Nature Value farmland (most of which are found in the Highlands and Islands) reveals that the majority of the funding is not going to support the farming systems that are most valuable for nature. This proposal does not include enough information to reassure us that this will change in the future; it needs to.

This response was compiled on behalf of LINK Food & Farming Group and is supported by:

The Association for the Protection of Rural Scotland

Badenoch & Strathspey Conservation Group

Bat Conservation Trust

Buglife

Bumblebee Conservation Trust

Butterfly Conservation Scotland

Cairngorms Campaign

Keep Scotland Beautiful

Nature Foundation

Nourish Scotland

Pasture for Life

Plantlife Scotland

Ramblers Scotland

RSPB Scotland

ScotFWAG

Soil Association Scotland

Trees for Life

Woodland Trust Scotland

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Scottish Environment LINK the voice for Scotland's environment



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