



## **Scottish Environment LINK response to Just Transition – Land Use and Agriculture discussion paper**

### **Introduction**

Scottish Environment LINK welcomes the Just Transition – Land use and Agriculture discussion paper. 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. 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. 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 response was written by LINK's Sustainable Economy, Land Use, Food and Farming, and Woodland groups.

### **Response**

#### **Summary of main points:**

- Whilst the discussion paper acknowledges a climate emergency, it fails to make clear the scale of change needed in the land based sectors to reach net zero and the challenges this presents.
- The paper lacks any proper analysis of the measures required to reach Net Zero, and the impact of such measures; and so takes us no further forward in thinking about what a Just Transition involves with regard to land use and agriculture.
- The paper should better convey that the nature crisis is intertwined with the climate crisis and its consideration is central to the Net Zero pathway for this sector. In reducing our emissions, it is critical to both avoid measures that might harm nature and include 'nature based solutions' which contribute to mitigation and sequestration.
- The final Just Transition Plan will need to focus much more on delivery.

#### **Vision and scale of change**

1. The vision in the discussion paper singles out forestry and woodlands for expansion, (whereas we need more semi-natural habitats, including grassland, wetland, scrub mosaic and native woodland); and makes no mention of local communities. It should include a description of what our landscapes will look like, and how they need to function to provide us all with all the services (including carbon sequestration and storage, biodiversity, livelihoods for local communities, food, fiber and energy production) that the Scottish population will need.
2. Just Transition is about the outcome and the process and as such the vision could also capture the need for a properly planned and resourced transition which can increase employment on the land and community benefit from the land.



3. The discussion paper fails to convey the magnitude of change that the sector needs to undergo and the urgency. The paper refers to how the land use sector emits 0.5 MtCO<sub>2</sub>e (2020 figures) and, while this net figure is correct, it gives the impression that emissions are less of an issue than they are. It is important to convey that, first, the sector is a large emitter of carbon and, second, that its sequestration potential is going to be used by other sectors as well as land use and agriculture. Please see the annex for a more detailed explanation of the emissions and how they are communicated.
4. As well as the overall magnitude of the change needed, there are a few areas that are particularly pertinent in relation to the size of the problem and this needs to be given more emphasis:
  - The significant role of peatland (as an emitter and sequester of carbon) needs to be highlighted as does the scale of peatland restoration required and associated need for investment/ other mechanisms to make it happen, skills and training etc.
  - Sporting interests and deer numbers both weigh heavily on achieving Net Zero and wider social and environmental outcomes of the transition which needs recognition.
  - Integration of land uses and redefining ‘farming’, for example with more agro-forestry and woodlands on farms, will be a feature of the transition and should be spelled out.

### The Net Zero pathway

5. Although the discussion paper refers to needing to see a dramatic increase in rates of tree planting and peatland restoration, it doesn’t include a clear pathway of emissions reduction that will enable us to get to Net Zero whilst also addressing the nature crises. Consequently, there is no clarity about the impacts on particular industries or businesses and no analysis of how to make that transition ‘just’.
6. We acknowledge that this paper can’t pre-empt the upcoming Climate Change Plan, but we do know enough about the sort of measures that will be needed. The Climate Change Committee (CCC) has provided a pathway through which Net Zero could be achieved<sup>1</sup>. Under their modelling we need to see a large expansion of woodland and a large amount of restoration of our degraded peatlands and they envisage that this will require a conversion of around 20% of Scotland’s farmland to those uses. They envisage that this could be accommodated by a reduced need for such a large agricultural area driven by dietary change with a 20% drop in red meat and dairy consumption<sup>2</sup>. These measures can be compatible with nature restoration if done in the right way and this always needs to be built in.
7. As such, a potential pathway to Net Zero exists and it raises issues that would need to be addressed in any consideration of a Just Transition. If we need to see a large expansion of woodland, how can it be accommodated and who would be affected? If we see a reduction in red meat and dairy consumption, which parts of the industry are likely to be the most negatively affected and what sort of support is needed to prevent negative social and environmental outcomes?
8. The government does not have to agree with the pathway set out by the CCC, but it needs a plan so that the detailed issues that are likely to arise from our efforts to reach Net Zero can be properly considered.

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<sup>1</sup> <https://www.theccc.org.uk/publication/sixth-carbon-budget/>

<sup>2</sup> Also worth noting <https://eatforum.org/eat-lancet-commission/> and the live debate in this area, for example the view that we need better dairy rather than less dairy - moving to dairy beef rather than suckler beef is more resource efficient and dairy is more important in people's diet. Also work by the Wageningen Institute <https://www.circularfoodsystems.org/en/circularfoodsystems.htm>  
[https://www.researchgate.net/profile/Renee\\_Cardinaals](https://www.researchgate.net/profile/Renee_Cardinaals)



## Nature

9. Though the definition of Just Transition relates to net zero and so clearly this is the focus, the discussion paper needs to convey the intertwined nature of the climate and nature crises, which particularly plays out in this sector. The need to address the nature crisis should play a bigger role in how we tackle the climate crisis or we could negatively impact the state of nature, for example by planting the wrong trees in the wrong places or failing to recognise the value of other habitats to climate, nature and people.
10. Considerable emphasis is given to forestry as a key contributor to Net Zero, but inadequate attention to the type of forestry. Trees have the potential to sequester carbon and can play a significant role in achieving net zero. However, the science is complex. We do not wish to see a “race for carbon”, with potentially little or even negative impacts on our environment and climate change adaptation. Woodlands and especially our native woodlands should be expanded on the basis of delivering better environmental and social outcomes and carbon sequestration should be an added benefit, not a sole objective. In terms of forests and woodland as nature-based solutions to climate change, LINK members would like to highlight several points:
- That the nature benefit of plantation forestry depends on several factors – mainly species diversity of the trees, its structure and where it is planted<sup>3</sup>.
  - Hedgerows and agroforestry bring many benefits, including enhancing biodiversity on farms, and can also be included as nature-based solutions.
  - There needs to be a sensible approach to where trees are planted. Care needs to be taken when considering establishing woodlands on organic soils – in some cases planting on such soils can be detrimental to achieving net zero<sup>4</sup>. Also, the value of the habitat which new woods are displacing needs to be considered.
  - Natural regeneration is preferable for a number of reasons (naturally avoids unsuitable ground, visually more pleasing, reduced costs, varied structure good for biodiversity) but relies on reduced browsing pressure.
  - The socio-economic benefits of forestry / woodlands<sup>5</sup> are also important to remember when considering just transition.
11. Nature-based solutions are a vital part of the transition. There are other habitats (in addition to peatland and forestry / woodlands) that deliver for carbon and nature such as wetlands, open scrub mosaics and species rich grassland. Incorporating species rich grasslands into the farming system can be a win-win for biodiversity, climate and the farm business<sup>6</sup>.

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<sup>3</sup> lepidoptera-centric: Clarke, S.A., Green, D.G., Bourn, N.A. & Hoare, D.J. (2011) *Woodland Management for Butterflies and Moths: A Best Practice Guide*. Butterfly Conservation; Fuentes-Montemayor, E., Peredo-Alvarez, V.M., Watts, K. & Park, K.J. (2015) Are woodland creation schemes providing suitable resources for biodiversity? *Biodiversity Conservation*.

<sup>4</sup> <https://onlinelibrary.wiley.com/doi/full/10.1111/gcb.15229>

<sup>5</sup> <https://www.nature.scot/professional-advice/land-and-sea-management/managing-land/forests-and-woodlands/woodland-benefits>

<sup>6</sup> Please see case study from Wales: <https://www.bumblebeeconservation.org/partner-led-projects/calon-wen-pastures-for-pollinators/> Further evidence can be found here <https://www.plantlife.org.uk/our-work/the-grassland-gap/> Details of the value of grassland as a carbon store <https://www.plantlife.org.uk/wp-content/uploads/2023/08/Grasslands-as-a-Carbon-Store.pdf>



12. Healthy agricultural soils offer sustained production and opportunities for nature-based solutions that protect and restore ecosystem services, tackling biodiversity loss and climate change resilience. The contamination of agricultural soils must be avoided if we truly value Scotland's soils<sup>7</sup>.

## Other

13. Various other comments and omissions come to mind on reading the discussion paper:
- Increased awareness and understanding about the changes needed should be an outcome of the Just Transition process.
  - Communities of interest, such as environmental NGOs, as well as communities of place, have a positive role in the transition.
  - A circular economy focus brings socio-economic opportunities as well as contributing to the delivery of Net Zero. Reducing waste from land based enterprises through making use of bio-arisings will contribute to a Just Transition in this sector.
  - The Just Transition should include consideration of any social and environmental impacts overseas. As such, Net Zero needs to be achieved without offshoring any emissions and the aim should be to reduce our overseas footprints.
  - The importance of maintaining / increasing public access to land has the potential to provide a range of public goods; increasing nature connectedness, supporting physical activity and wellbeing, enabling community connections including the potential for active travel. For some farmers it has also allowed them to diversify into farm shops and cafes which link to the local path network, bringing economic benefit. This public access needs financial support since the individual farmer generally doesn't gain any benefit from creating or maintaining paths, gates, signs, etc.
  - Costs and uncertainty over future funding makes it hard for enterprises to prepare / invest for the future. Also, the aging population in the sector, access to land, cost of land and tenancies and wider labour shortages are all issues that need to be taken into consideration and mitigated against as far as possible.
  - Raising awareness and training in innovative farming practices will encourage future land managers to restore nature, protecting businesses and the environment.

## Delivery

14. The Just Transition Plan will have to also look at delivery - policy and mechanisms to bring about Net Zero in a way that is nature positive and just. This needs a holistic approach to land use policy that makes full, and integrated use of all the tools that are at the SG's disposal - e.g. legislation, regulation, taxation, subsidies, grants, advice, education and training.

Suggested ideas for delivery:

- Investment in rural skills and employment to help Scotland meet its peatland restoration targets. The Skills Action Plan for Rural Scotland needs to consider how to make peatland restoration a new rural industry.
- Support for circular economy enterprises in the sector, reducing waste and making use of bio-arisings.

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<sup>7</sup> [https://www.fidra.org.uk/sewage\\_free\\_soils/](https://www.fidra.org.uk/sewage_free_soils/)



- Land reform legislation to increase the access that communities have to assets and to require land to be managed in the public interest and for climate and nature.
- A Carbon Emissions Land Tax to compel the larger landowners to restore degraded land that is currently emitting carbon.
- A regulatory standard for carbon offsetting projects which is compatible with the Land Rights and Responsibilities Statement and principles.
- Cross-compliance for all relevant public subsidies, including future agricultural support and forestry grants, should make the receipt of public funding conditional on compliance with policies to reduce carbon emissions and restore nature from land uses (e.g., deer numbers, soil carbon and nutrient monitoring, land management plans).
- The role of demand side policies needs to be included to create demand for the products of Net Zero and nature positive land use and support a Just Transition – procurement policy, consumer awareness raising campaigns, policies to nudge dietary change, and encourage lenders and buyers to focus on scope three emissions and supply chain due diligence.
- Good Food Nation Plans to support local sustainably produced food.

**This submission is supported by the following LINK members:**

Bumblebee Conservation Trust  
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Ramblers Scotland  
Fidra  
Soil Association Scotland  
Amphibian and Reptile Conservation  
WWF Scotland



## ANNEX

### The detail that needs communicating

The discussion document refers to how the land use sector emits 0.4 MtCO<sub>2</sub>e (2021 figures) and it uses the main greenhouse gas graph to illustrate the point. While this net figure is correct, it makes it look like a minor issue when it is not.

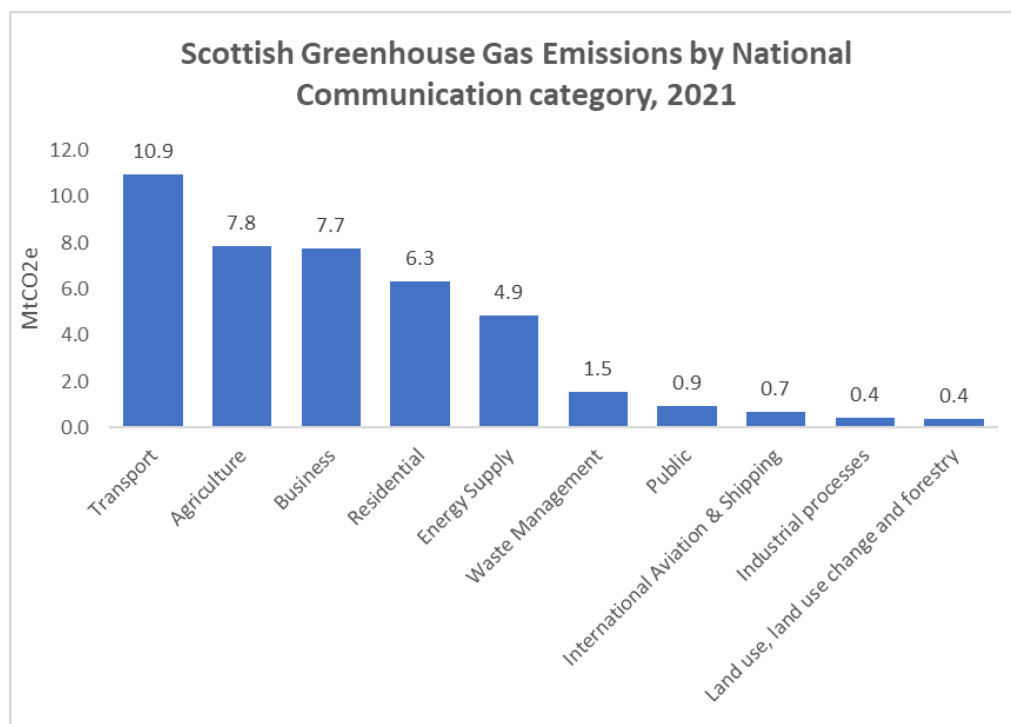


Figure 1: conventional reporting of GHG statistics

It is important that it is understood that the land is a big source of emissions and that this is separate from agriculture in the inventory. A precursor step towards a Just Transition must be a much better general understanding of what the challenge is that we collectively face. This is important context that was skated over in the discussion document, but which is vital for situating the concept of the Just Transition.

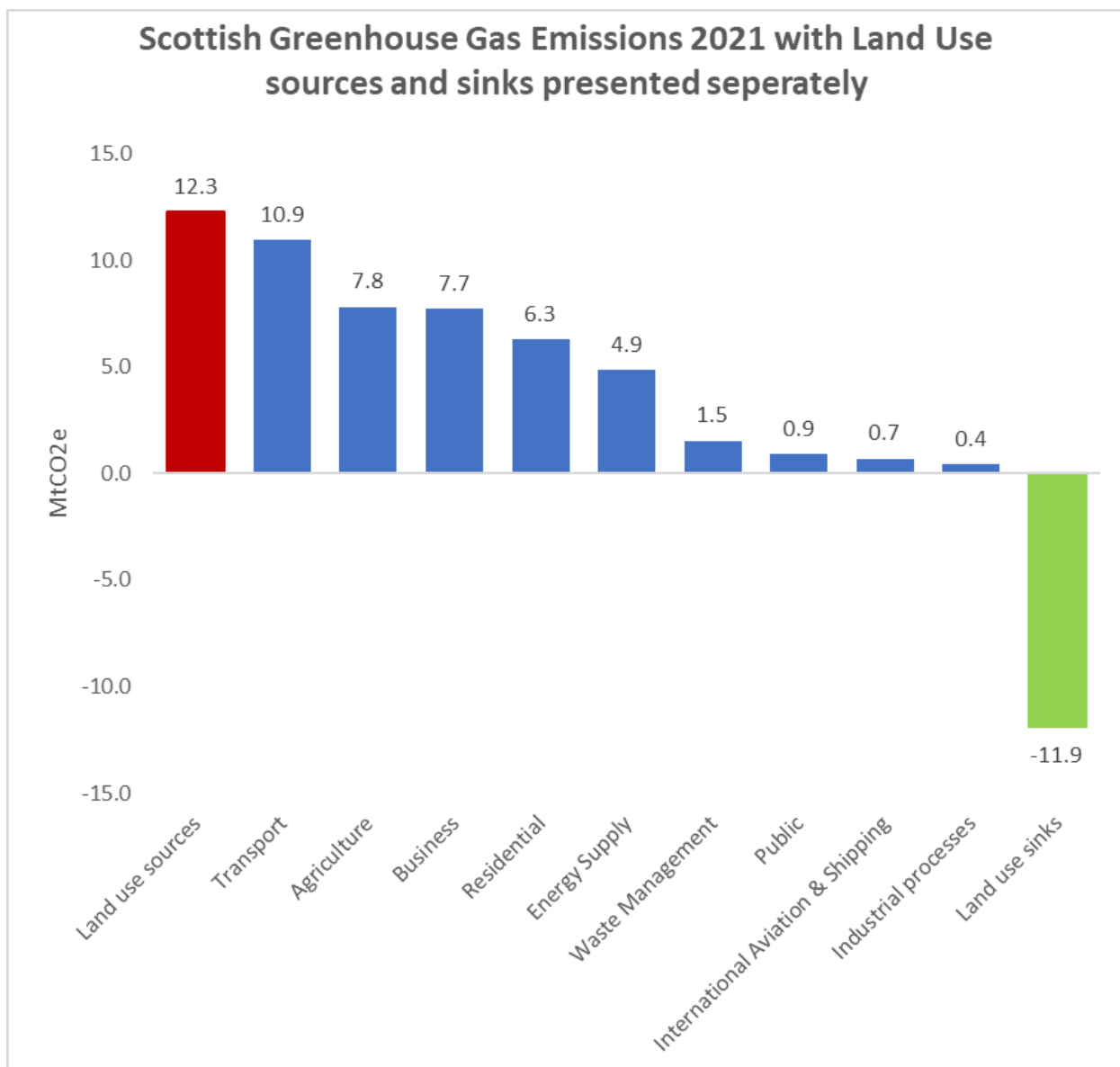


Figure 2: Scottish Greenhouse gas emissions 2021, with Land Use emissions and removals presented separately.

The same issues apply more specifically to peatlands. Peatlands are a major source of emissions and figure prominently in plans for reaching Net Zero, but the government needs to find a better way of illustrating how important they are as a precursor to being able to properly talk about the changes needed with the land management sector.

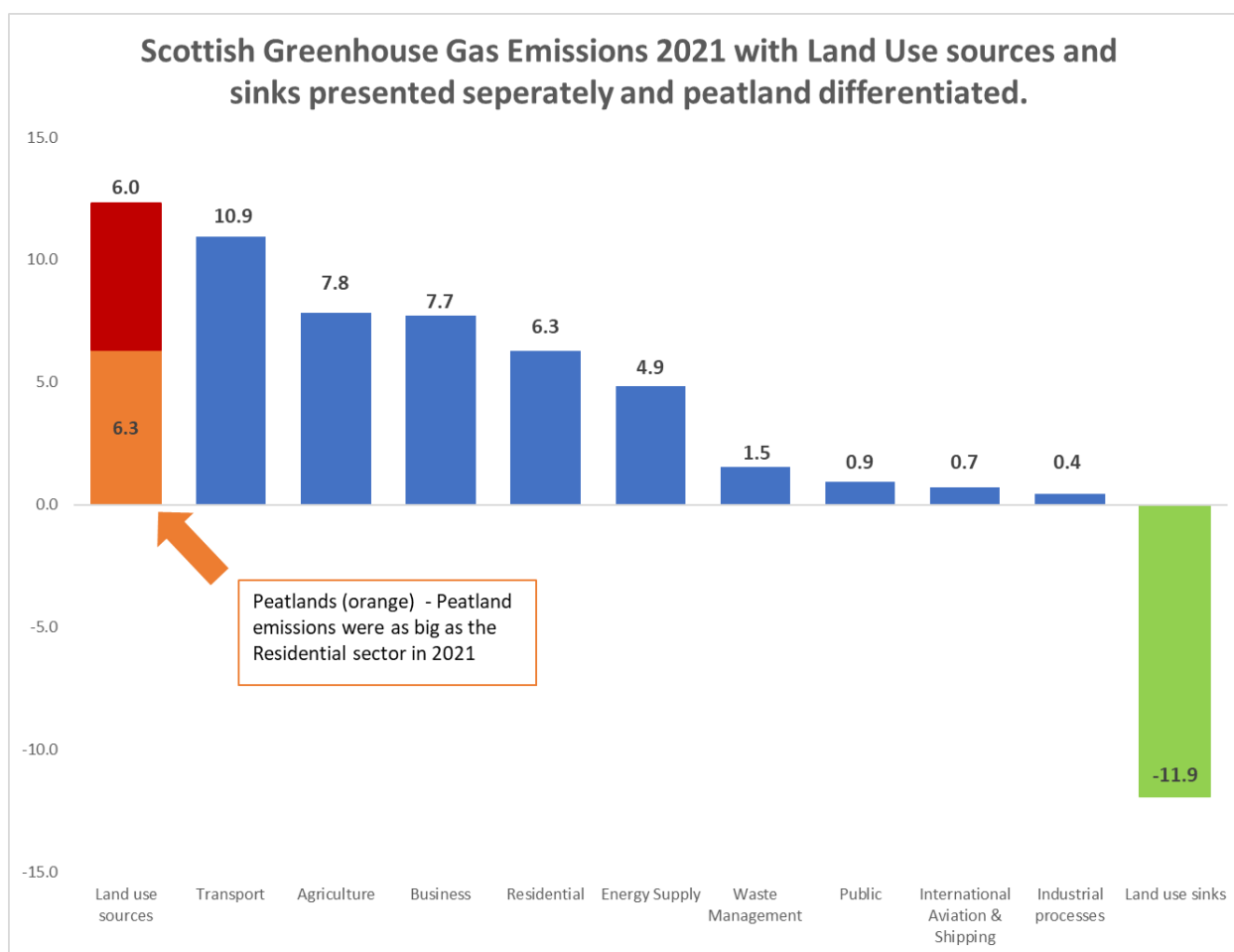


Figure 3: Scottish Greenhouse gas emissions 2021, with Land Use emissions and removals presented separately and peatland emissions superimposed. Peatland data is difficult to extract from the GHG inventory; here data supplied by UK Government BEIS for 2019 has been superimposed for illustration on the assumption that little has changed in peatland emissions.



Scottish Environment LINK the voice for Scotland's environment

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