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Environment
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Màiri McAllan MSP
Cabinet Secretary for Wellbeing Economy, Net Zero and Energy
Scottish Government

By email to: cabsecwenze@gov.scot

cc Mairi Gougeon, Cabinet Secretary for Rural Affairs, Land Reform and Islands

April 2nd, 2024

Dear Cabinet Secretary,

CLIMATE CHANGE PLAN – AGRICULTURE

We were grateful for your invitation last week to attend a roundtable discussion in response to the Climate Change Committee's report to Parliament. We discussed the importance of reducing agricultural emissions in relation to Scotland's climate targets. You offered to convene a meeting with the Cabinet Secretary for Rural Affairs and the Minister for Agriculture to discuss this further.

The Climate Change Committee report recommended that the Scottish Government should "set out how future support systems will integrate and address the objectives for food, nature, and climate". The Vision for Agriculture sets a high level objective for Scotland to become a global leader in sustainable and regenerative agriculture. LINK members support this objective and see the Agriculture and Rural Communities Bill as an opportunity to set a clear direction of travel for the industry. However, we do not believe that the detail provided to date has been sufficient to give us confidence that the new system will meaningfully impact environmental outcomes. We understand that the Agricultural Reform Route Map is an attempt to provide information on the development of the scheme; however, this document is focused on procedure and intended outcomes, and provides little information on how farmers and crofters will be supported to change agricultural practices.

LINK is aware of the political difficulties around changing agriculture. Our Farm for Scotland's Future campaign is advised by farming groups and we seek to elevate the voices of nature-friendly farmers and crofters in Scotland. We are also acutely aware that agriculture is an industry particularly exposed to the



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impact of climate change and nature loss. We have attempted to develop credible and realistic proposals as to how the new funding system can deliver environmental outcomes while supporting a resilient and vibrant agricultural sector. It is our view that industry needs a much stronger understanding of the changes that they will be expected to undertake and how the funding system will support this transition.

The Scottish Government's response to the Climate Change Committee's report must outline a credible path forward to reducing agricultural emissions. LINK's priorities for action are:

- Specific policies to reduce methane, nitrogen, and carbon emissions from agriculture. We have shared proposals on these with your officials.
- A commitment to set specific targets to reduce agriculture's environmental impact, such as artificial fertiliser reduction.
- A clear signal that the distribution of funding will move away from direct payments over time, and for this to be incorporated in the first Rural Support Plan.
- A commitment to increase conditionality standards in direct payments over time.
- The use of redistributive mechanisms in Tier 1 to free money for use on environmental measures.
- Ministers to commission independent advice from the Climate Change Committee and other relevant bodies on the drafting of the first Rural Support Plan, and for this advice to be published alongside the Plan.
- Amendments to the Bill to establish a mid-term review cycle of the Rural Support Plan, and to require Ministers to take independent advice from the Climate Change Committee and others in setting future Rural Support Plans.

NATURE RESTORATION AND CLIMATE CHANGE

The climate crisis and the nature crisis are two sides of the same emergency. Restoration of habitats such as woodlands and peatlands are crucial in meeting our emissions targets and nature restoration can also play a key role in climate adaptation. The introduction of nature targets through the Natural Environment Bill is an important step and we encourage you to view this as one mechanism that will support Scotland's journey to Net Zero.

LINK has developed key asks for the Natural Environment Bill that have the potential to be influential in tackling the twin crises:

- Adopting a target of making at least 50% of new woodlands native will support nature's recovery and form the larger long-term carbon stores we need for beyond 2045.
- Scotland's two National Parks have delivered some significant and successful nature conservation projects. However, despite this great action, nature still faces many challenges. Stronger duties

must be placed on all public bodies operating within National Parks to further National Park aims and to support and actively contribute to the implementation of the National Park Plan. Reforming National Parks is a unique opportunity to demonstrate how nature recovery can be delivered at scale in a way that helps create a just transition locally and nationally.

- Managing deer numbers strategically will bring about a wide raft of benefits such as increasing natural woodland cover to strengthen biodiversity, soak up carbon and reduce flooding as well as diversifying and strengthening local economies in our most sparsely populated areas. LINK supports Scottish Government's proposals built on the recommendations of the independent Deer Working Group Report but also other measures to modernise deer management in Scotland.
- Scotland's marine environment is a crucial part of our biodiversity, encompassing a wide range of ecosystems. They are a vital resource that supports a diverse range of marine industries and deliver crucial ecosystem services including the sequestration of 'blue carbon.' LINK is calling for the statutory basis of Scottish Government's powers to designate Marine Protected Areas (MPAs) for conservation reasons, as well as powers under the Inshore Fishing Act, to be updated to include issues such as climate adaptation as matters for consideration.

We would be happy to discuss any of these points in further detail.

Yours sincerely,

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