

LINK submission to Rural Affairs Committee

August 2026

Scottish Environment LINK is the forum for Scotland's voluntary environment community, with 50 member bodies representing a broad spectrum of environmental interests with the common goal of contributing to a more environmentally sustainable society. While LINK has not been invited to provide oral evidence at the upcoming sessions on agriculture policy, we are happy to provide a written outline of our views. A range of LINK members are directly involved in agriculture as land managers and advisers, and we have a wider interest in the environmental aspects of farming.

Reflections on the four-tier framework, and the schemes mapped against each tier.

LINK members have consistently argued that significant reform of agricultural payments is necessary. The system as it stands, inherited from the Common Agricultural Policy, is unfair, inefficient and largely unlinked to outcomes. In an era where climate change and nature loss are having direct impacts on food production and on the economic sustainability of the industry, a business-as-usual approach is not fit for purpose.

The introduction of a new system was an opportunity to ensure that public funding for agriculture directly supports environmentally and economically sustainable agriculture. This is an opportunity that has been missed. While the four-tier framework could in principle work, the first Rural Support Plan has effectively copy-and-pasted the existing distribution of funding into a new payment structure.

The Rural Support Plan is required to set out "any specific outcomes that the Scottish Ministers are seeking to achieve (whether in respect of different support schemes or otherwise)" (Section 2(2)(vi)). The current plan sets out a framework of outcomes and sub-outcomes but fails entirely to show how budget has been allocated to optimise the delivery of those outcomes and sub-outcomes. The budget allocation between tiers was arbitrary and based only on existing allocations.

The Scottish Government's own analysis of CAP, published in 2023, explains clearly the issues with this legacy approach. The analysis found that CAP "did not deliver the intended benefits or value for public money" and "had little environmental benefit, and in some cases may have had a negative impact". The analysis also found that "Greening and Less Favoured Area Support Scheme have been found not to deliver as effectively as possible on their stated objectives" while "some small schemes, such as Agri-Environment Climate Scheme, have been found to have a positive impact, though limited by budget or uptake".¹

In our view, Scottish Government failed to follow their own guidance issued in March 2026 to Scottish public bodies under the Climate Change (Scotland) Act 2009. The 2009 Act requires relevant public bodies in Scotland to meet the climate change duties. The duties are set out in section 44(1) of the 2009 Act and require that a public body must, in exercising its functions, act –

¹ <https://www.gov.scot/publications/agriculture-rural-communities-scotland-bill-supporting-evidence-analysis/pages/9/>



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- a. in the way best calculated to contribute to the delivery of emissions reduction targets (i.e. mitigation. In the context of the duties, 'targets' means both the five-yearly carbon budgets and the final 2045 target)
- b. in the way best calculated to help deliver the Scottish National Adaptation Plan
- c. in a way that it considers most sustainable

Among other requirements, this guidance requires public bodies to “work with urgency to reduce GHG emissions as quickly as possible in order to get under and stay under 1.5 °C aligned decarbonisation pathways, i.e. to go as far as possible as fast as possible, and minimise cumulative emissions”. It also requires public bodies to “ensure that mitigation actions maximise co-benefits, such as improved public health, reduced inequalities and enhanced biodiversity”.

It is not clear how in drawing up the Rural Support Plan, the Government had regard to this guidance.

The timescales for reform proposed in the Rural Support Plan.

The Rural Support Plan proposes a static distribution of funding across the Tiers until the final year of the plan period (2030-31), at which point a small proportion of Tier 1 funding will be redistributed into Tiers 3 and 4.

LINK members have consistently argued in favour of moving funding out of Tier 1 and into the higher Tiers. It is positive that the Scottish Government has outlined this intention. However, the timescale is far too slow and is inadequate for meeting the government's stated objective to become a world leader in sustainable and regenerative agriculture. Under this plan it will be close to a decade from the publication of the Vision for Agriculture (March 2022) to an even modest change in the distribution of funding.

Whether there is sufficient clarity around the direction of travel provided in the Rural Support Plan.

The Rural Support Plan includes timings for some specific changes around enhanced greening and whole farm plans. More broadly, the Plan is a missed opportunity to set a clear direction of travel for farmers and crofters.

The Agricultural and Rural Communities Act was amended during the parliamentary process to state that the Rural Support Plan “may” describe how agricultural support will support a range of environmental outcomes, including greenhouse gas reductions, reduction of harm from pesticides, reduction of nitrogen loss and waste, and improved biodiversity. LINK members believed that the Rural Support Plan was an opportunity to directly outline how funding would support these outcomes over time. The Scottish Government opted not to do so, stating that “whilst the support described in this Plan will contribute towards the achievement of these outcomes, their consideration is not specifically covered in this Plan”.

It is not clear how the plan has fulfilled the broader Fairer Scotland duty to actively consider how they can “reduce inequalities of outcome caused by socio-economic disadvantage, when making strategic decisions.” The current distribution of farm support sustains rather than reduces inequalities.

The process around producing the Rural Support Plan, and stakeholder engagement during this process.

The Government's own consultation statement published alongside the Rural Support Plan in March 2026 shows that engagement was late and limited.

As LINK members have consistently argued, the RSP should have been a comprehensive analysis of how funding and policy could be directed to deliver the Vision for Agriculture and the objectives of the 2024 Act.

This would then provide Parliament with the rationale for the secondary legislation on the four-tier scheme, and for future budget allocations.

An outline of the Rural Support Plan was shared with Rural Affairs and Islands Committee in June 2024. After that point, Scottish Environment Link was not invited to any stakeholder engagement (and is unaware of any stakeholder engagement processes) until October 2025 when an updated draft was circulated. There was no substantive discussion of the Rural Support Plan at ARIOB until November 2025.

In December 2025 a number of environmental representatives walked away from the Agriculture Reform Implementation Oversight Board (ARIOB) and the accompanying Policy Development Group. This included Pete Ritchie, the Convener of LINK's Food and Farming Group.

Our statement at the time is available at: <https://www.scotlink.org/environmental-representatives-walk-away-from-failed-farming-policy-process/>

Next steps for agriculture policy

As immediate priorities for agricultural reform, LINK proposes that the Scottish Government:

1. Progress the Whole Farm Plan concept through 1:1 advice to turn audits into implementation
2. Develop, improve and increase funding for AECS (including organic farming)
3. Fund 10 landscape-scale collaborative action projects
4. Upscale agroforestry
5. Replace LFASS with a High Nature Value farming payment

We are happy to provide any further detail on any of these points.