

Climate Change Plan call for views: summary of responses for the Agriculture sector

The Net Zero, Energy and Transport Committee ran a proactive [Call for Views on the forthcoming Draft Climate Change Plan \(CCP\)](#) from 27 June to 19 September 2025. This SPICe briefing highlights key agriculture sector issues raised by respondents. It is not intended to be a comprehensive summary, but a brief overview of key issues raised. Full responses are published on the Scottish Parliament website: [Published responses for Draft Climate Change Plan Scrutiny 2025 - Scottish Parliament - Citizen Space](#).

A table of acronyms used to refer to the organisations that submitted responses is included at the end of the document.¹

What are the most important policies needed to achieve the proposed carbon budgets?

Changes to agricultural policy, including subsidy reform

Most of the respondents highlighted that the **ongoing reform of agricultural policy and funding** is key to ensuring that the agricultural sector is able to reduce emissions and contribute to climate change mitigation.

Two respondents (National Farmers Union Scotland (NFUS) and WWF Scotland) highlighted that the final CCP must provide details of both financial and advisory support that will be available to farmers and crofters.

WWF Scotland raised a number of further financial points:

- The need for a “multi-year funding framework”, without which “farmers face uncertainty that discourages investment in climate-friendly practices”. They advocate at least 75% of the agricultural budget to be allocated to climate and nature-friendly farming.
- That the Scottish Government needs to deliver on its commitment to cap, taper, and front-load agricultural payments from 2027.
- That there should be a £500m Agricultural Transformation Fund for the first carbon budget period to act as “insurance” to mitigate the risks of transition for farmers and crofters, such as “initial yield drops or costs of new equipment”. They propose ways that this could be funded.
- That the Scottish Government should work with financial institutions to “allow scheme options to be bundled or stacked with private funding streams”.

¹ Note: The table includes all organisations that submitted a response to the Call for Views. However, not all organisations responded to every section, and not all acronyms appear in each briefing.

Two respondents also mentioned necessary changes to eligibility rules to ensure that funding schemes are coherent and do not penalise farmers for climate change activities. NatureScot noted that, as part of agriculture policy reform, they wish to see a review of eligibility rules such as ‘minimum agricultural activity’ and the definition of eligible activities. They note:

“at present a land manager considering entering a landscape-scale woodland creation project faces losing agricultural support payments (Basic Payment Scheme, Less Favoured Area Support Scheme, Scottish Upland Sheep Support Scheme). This may act as a disincentive for change as forestry grant funded projects require capital investment, offer uncertain revenues, and it may take a decade for carbon market payments to provide significant returns.”

LUNZ Hub RESPECT Project ([a collaborative project between a number of research institutes regarding agricultural practices on peatland](#), hereafter referred to as the ‘RESPECT project’) highlighted a similar issue in relation to peatlands, where restoration has impacted the eligibility of producers to receive agricultural payments. They also look to reform of agricultural subsidies as a large policy element of the CCP.

Three respondents also noted the role of **enhanced conditionality**. NatureScot and WWF Scotland both emphasised that healthy habitats and diverse ecosystems are essential to resilient food production systems; NatureScot proposed that this could be achieved through enhanced conditionality as part of a new agricultural subsidy system. Nourish Scotland expressed a desire to see conditionality enhanced beyond the plans and audits which have been introduced so far. They note that there is no “regard to acting on recommendations or measurable improvements in the environmental performance.”

One respondent, Scotland Excel, highlighted that circular agriculture should be promoted: “Encourage waste reduction, reuse of inputs and investment in local processing to lower emissions across the food system.”

The Highland Council set out a list of **measures for low-carbon farming** which span a number of themes:

1. “Productivity with Lower Emissions
 - a. Require whole-farm carbon audits.
 - b. Improve animal health and fertility.
 - c. Promote forage and soil improvements such as multi-species swards, legumes, and rotational grazing.
2. Methane and Manure Management
 - a. Upgrade slurry storage, spreading systems, and pH balancing.
 - b. Support methane-reducing feed additives as evidence matures.

- c. Encourage modular anaerobic digestion (AD) to turn waste into local heat and power.
- 3. Soil Carbon and Agroforestry
 - a. Provide payments for regenerative practices.
 - b. Support hedgerows, riparian planting, and agroforestry.
 - c. Recognise these as adaptation tools that protect soils from drought and heavy rain.
- 4. On-Farm Renewables and Sector Coupling
 - a. Expand rooftop solar, small wind, and farm-based micro-grids.
 - b. Encourage farms to use surplus energy for chilling, drying, and charging machinery.
- 5. Localised Food Security
 - a. Support horticulture and controlled-environment farming (hydroponics, glasshouses).
 - b. Position venison as a staple low-carbon protein, distributed into schools, hospitals, and communities.
 - c. Use public procurement to anchor local markets.
- 6. Supply Chain Reform
 - a. Develop standards for low-carbon produce.
 - b. Ensure supply chains reward producers fairly.”

Soil health, peatland restoration, carbon sequestration and agroforestry

Several respondents highlighted a **need for measures which look at agriculture, forestry, peatlands and soils together**. For example, NFUS stressed that the CCP should focus on “integration of different activities alongside active farming, rather than wholesale land use change”.

Other respondents highlighted a **need for woodland and peatland measures on farms**. NatureScot highlighted that more attention should be paid to **agroforestry and hedgerows**:

“In the 7th Carbon Budget, the CCC [Climate Change Committee] envisages a substantial increase in agroforestry (10% of agricultural land from very little at present) and hedgerows with a 40% increase in the length of managed hedgerows at UK level (by 2050). These offer opportunities to increase sequestration in trees in the landscape without necessarily changing land

use...we would welcome the setting of a target for hedgerows expansion along the lines of what the CCC recommends. We would welcome the same on agroforestry. Agroforestry has had relatively low levels of uptake in Scotland. We think we need greater policy focus, with an ambitious plan for agroforestry, which may include targets. The Agricultural Reform Programme (ARP) and Forestry Grant Scheme should be used to increase the incentivisation of agroforestry.”

The RESPECT project similarly raised that there should be **support for sustainable agricultural management of peatlands**. They note that “paludiculture [growing food on rewetted peatlands] in the lowlands, and extensive grazing in the uplands, including with native livestock, could deliver multiple benefits from land, but such (new or traditional) practices require adequate public support”.

Two respondents, NatureScot and Aberdeen City Council also highlighted the importance of agricultural soils. NatureScot noted a need to have **strong policies protecting existing carbon stores in agricultural soils**, through regenerative farming practices (e.g. maintaining soil cover, and reducing ploughing), as well as protection of hedges, trees, peatlands and wetlands. They note that this can be supported through the Code of Practice on Sustainable and Regenerative Agriculture and through the Agricultural Reform Programme.

Livestock reduction and emissions policy

Several (SCCS, RSPB Scotland, Stockfree Farming, NFUS) responses addressed the **Scottish Government’s response to the CCC’s advice**, in which the Scottish Government stated that it **will not bring forward policy to reduce livestock numbers**.

Some of these responses encouraged the Committee to scrutinise this decision. SCCS stated in its response:

“Irrespective of which approach is more desirable, the CCC advice and the Scottish Government’s indicative statement are clearly at variance – and these different approaches should be subject to scrutiny to clarify their likely efficacy at delivering emissions reductions (and the consequential impacts on emissions reduction pathways for other sectors).”

The organisation also raised several points that it asked the Committee to consider, including:

- Whether the Scottish Government’s position means a maintenance of the status quo, or whether “a more sustainable outcome could include a scenario with fewer (but higher quality and more profitable) livestock, supported by an expansion of, for instance, organic production, forestry, peatland management and other rural sectors?”
- Whether the Scottish Government’s statement that “there is no policy to reduce livestock numbers” means there is a proactive policy to maintain or increase numbers, “or simply the absence of a policy to proactively reduce numbers”.

- Whether the Scottish Government would seek to intervene, should livestock numbers increase as a result of other factors than deliberate policy intention.
- What are the “knock-on consequences for other policy objectives (e.g. biodiversity) from the proposed agriculture policies”.

RSPB Scotland emphasised the interconnectedness of the CCC’s balanced pathway, highlighting that the CCC’s assumption is that a reduction in livestock numbers would be supported by dietary change to reduce consumption of meat and dairy (ensuring that a shortfall in domestic production is not made up in imports). Moreover, reductions in livestock numbers are intended to free up land for carbon sequestration, such as tree planting and forestry. They highlighted a number of nuances to the discussion around livestock numbers:

“There are important questions about, for example, how a reduction in numbers would be delivered and how any negative consequences could be mitigated. Should the government be specifically advocating dietary change to the population (and leaving a reduction in livestock numbers to the market), or should the government be directly intervening to remove animals from the national flock/herd?

There are also questions about where reductions in livestock numbers would be felt. Given the government’s focus on the efficiency of meat production, it could follow that gains could be made by removing the least efficient animals in carbon terms. However, given that these slower-maturing animals tend to be found in High Nature Value farming areas like the crofting counties, might this efficiency focus lead to land abandonment and negative nature conservation outcomes? Consequently, any proactive move to reduce numbers would have to be approached very carefully in order to minimise negative unintended consequences.”

The organisation also raised potential unintended consequences:

“It is potentially possible that land use change could still be delivered whilst livestock numbers stay broadly the same (at the national level), but this could involve significant structural change in the industry where some businesses intensify and grow whilst others leave farming. This sort of change would see an intensification of production in some places, which raises questions about whether this is the sort of change that is desirable. We only have to think about the focus on poor water quality in England as a result of intensive livestock production to understand the issues.”

Nourish Scotland discussed livestock numbers in terms of stocking density and noted that it would like “government policy to promote reduction in stock density”. It highlighted [research which found that “reducing stocking density can improve farm profitability](#) and...reduce GHG emissions. Maintaining livestock numbers which exceeds the natural carrying capacity of the land, requires additional feed and fertilisers which increase costs.”

Stockfree Farming, which specialises in the question of moving away from livestock farming, provided a series of detailed and time-bound steps towards reducing

livestock numbers under the following broad headings (an example measure is provided below, see response for full plan):

- “Provide financial support for livestock reduction in line with the targets of the Climate Change Committee’s seventh carbon budget”, e.g. providing financial support for farmers to make plans to reduce headage by specific amounts between 2025 and 2045 and providing compensations for reductions.
- “Remove counterproductive policies and subsidy requirements aimed at maintaining herd size”, e.g. the minimum stocking densities for farms/crofts in payment regions two and three.
- “On land released from grazing, support farmers to engage in site-suitable land management practices”, e.g. forestry, peatland restoration “by increasing payment and capital grant rates, offering upfront funding, simplifying applications, and ensuring long-term contract security “ and “support farmers to grow food crops for human consumption to include arable, horticultural, silvoarable agroforestry, and orchards through robust, action-specific subsidies to mitigate transition risks and cover potential losses.”
- “Support farmers to diversity into sustainable, non-traditional agricultural initiatives” by e.g. extending capital support schemes.
- “Provide government-funded training, upskilling and development” by e.g. annual training allowances, and integrating upskilling support into existing schemes.

One individual advocated that there should be no subsidies for farmed venison but advocated for supporting the supply chain for wild venison, which they argue would have a variety of benefits, including to supply public kitchens and restaurants.

On the other hand, other respondents welcomed the Scottish Government’s announcement that it will not seek to reduce livestock numbers. NFUS welcomed “the Scottish Government’s rejection of the CCC’s recommendation to reduce livestock numbers” and note the focus on instead supporting the livestock sector “to reduce emissions through efficiency and innovation.” They note, however, that they “need further details on how exactly this will be done, what financial support will be available to do this, and how it fits in with the wider agricultural support scheme and associated budgets.”

Quality Meat Scotland (QMS), Scotland’s public body supporting the red meat sector, set out a plan for supporting the livestock sector to reduce emissions, summarised below (see response for full plan):

1. “Support with measurable outcomes, not paperwork” such as tying support to whole farm plans and ensuring higher-tier support rewards verified outcomes.
2. “Back “win–win” efficiency measures at scale”, such as genetics, fertility and herd health, measures to reduce synthetic nitrogen inputs, and improved slurry infrastructure.

3. “Recognise removals as well as emissions” in farming, by e.g. rewarding soil carbon management, hedges, peatland restoration, etc.
4. “Roll out a national measurement reporting and verification (MRV) framework”, e.g. using technology (deep soil coring, LiDAR scanning) to obtain consistent farm-level data.
5. “Encourage innovation without premature mandates”, e.g. by piloting feed inhibitors “with independent verification, not mandated” and trialling nature-based options.
6. “Protect competitiveness and supply chains” through e.g. public procurement of local produce with transparent emissions and supporting processors to decarbonise.

While broader than livestock farming, two organisations highlighted that **measures within agriculture should align with health outcomes**. In relation to dietary change, Public Health Scotland emphasised that there needs to be alignment between climate, health and food policy. They note that poor diet is a risk factor for a variety of diseases and conditions. They highlight that:

“Food Standards Scotland [FSS] advise that, rather than encouraging an ‘across the board’ reduction in meat consumption, efforts should focus on encouraging people who exceed the existing health recommendations to limit their consumption of red and red processed meat to no more than an average of 70g per day as this approach is more likely to deliver health benefits, whilst avoiding the risk of micronutrient deficiency in those who are at risk.”

This point stems from [FSS research which modelled the impact of reductions in meat and dairy on nutrient intakes](#). The research found that reducing meat and dairy may worsen micronutrient intakes among those who are already most at risk of deficiencies, but that this can be mitigated with “careful consideration of replacements” with healthy whole foods. The research found that reducing red and red processed meat intakes amongst the highest consumers (e.g. those consuming more than the recommended max of 70g/day) would achieve a 16% reduction in total meat intake.

The Royal College of Physicians Edinburgh Air Pollution Working Group (RCPE) supported a shift to “more plant-based, health-promoting diets”, arguing that “Scotland’s agriculture system overproduces red meat and underproduces fresh fruit, vegetables and pulses. Support farmers to diversify into horticulture, legumes, plants proteins and oats”. It also argued for binding targets for reduction in methane from ruminants, fertiliser and pesticide use, ammonia and nitrate runoff “which pollute waterways and harm respiratory health”.

Just Transition

Several respondents raised a **need for a just transition**, particularly through collaborating with and supporting farmers.

For example, NFUS emphasised that the transition to a more nature and climate friendly farming system “should be done with farmers and crofters in collaboration and not imposed upon them”. East Dunbartonshire council emphasised that, in addition to support to transition and diversify, farmers will require support for adaptation and to cope with the effects of climate change.

A few respondents also highlighted the need for peer knowledge exchange, support for training, and overhauling agricultural curriculums “to ensure they teach farming methods compatible with our biodiversity and climate ambitions” (Nourish Scotland)

The RCPE highlighted a need to **protect rural workers and public health** by “tighten[ing] regulation of pesticide exposure, nitrate pollution, and slurry storage, all of which are linked to health harms” and “ensure safe, fair working conditions for seasonal and migrant agricultural workers.”

Stirling Council raised that it wishes to see **more localised decision-making** through land reform to encourage smaller scale farms and devolution of responsibilities.

Links with wider food system, including public procurement

Several respondents (SCCS, East Dunbartonshire Council, 2050 Climate Group, Nourish Scotland) made **links between agricultural policies intended to address climate change and the wider food system**, including by integrating agriculture policies into food, local economies and health policies, and through public kitchens.

Historic environment and rural stewardship

BEFS (Built Environment Forum Scotland) raised that there should be integration between the “ways in which the historic existing and built environment is connected to agriculture and agri-environmental processes.”

When should these policies be introduced, and over what timeframe should they be implemented?

The majority of responses to this question emphasised the need for **immediate or rapid action** to roll-out policies and measures which support the agricultural sector to address climate change. Respondents variously raised the need for **business certainty** regarding the availability of support and timescales to allow for long-term planning, the **closing window to meet the 2045 net zero target**, the **risks of inaction** as vulnerability to climate impacts increases, the **increasing costs of delayed action**, and the need for the Scottish Government to set out **clear timescales** for policy changes.

Some respondents also highlighted that timeframes need to also allow the sector to adapt (NFUS), and to ensure the transition is just (SCCS).

The RCPE, Highland Council and QMS were more specific in the actions they would like to see on different timescales. The RCPE set out the following timeline:

“2025–2027: Immediate action

- Begin reform of farm payments by shifting to public money for public health and environmental benefit (e.g. agroecology, low-input farming, biodiversity, local food).
- Introduce new support schemes for farmers transitioning to horticulture and pulses, regenerative grazing and mixed farming, and community-supported agriculture.
- Establish clear emissions baselines and start tracking on-farm methane, ammonia, nitrate runoff and pesticide use. Crucially a firm deterrent is required for breaches, not merely a reporting system.
- Launch pilot health-and-sustainability public procurement trials in NHS hospitals, care homes and schools.

2027–2032: Scale-up and enforcement

- Make sustainable practice a condition of all agricultural subsidies by 2030.
- Phase in binding targets for methane and ammonia reductions, aligned with CCC advice.
- Require pesticide use reporting and drift monitoring to protect rural populations and workers.
- Expand regional infrastructure for local food production and distribution especially in food deserts and rural/remote communities.
- Fully integrate farming and food policy with NHS Scotland's preventative health programmes.

2032–2040: Full integration and health-linked delivery

- Scotland's entire subsidy system should reward net carbon removers, public health promoters and biodiversity stewards.
- Complete the shift to diets and food systems aligned with One Health and planetary health principles, including reductions in meat, dairy, and ultra-processed food.
- Embed food system resilience into climate adaptation plans ensuring communities can grow, access, and afford nutritious food even in a warming, volatile world."

Highland Council proposed the following timeline:

"2025–26: Begin farm audits, launch slurry/anaerobic digestion(AD) capital grants, set food procurement standards, and pilot venison hubs.

2026–30: Deliver slurry upgrades, deploy modular AD, expand horticulture pilots, mainstream legumes, expand agroforestry.

2031–35: Scale feed additives, grow horticulture supply, expand on-farm renewables.

2036–40: Consolidate regenerative farming and secure resilient local food chains.”

Finally, QMS proposed the following timeline:

“2026–30: Universal Whole Farm Plans as baseline support; rapid rollout of efficiency “win–wins”; early delivery of hedges, woodlands and peatland. Establish a national [measuring, reporting and verification] pathway using Baseline Pilot protocols and Scotland-wide LiDAR scans.

2031–35: Convert proven pilots into mainstream outcome-based payments; embed land-sharing models; expand processor decarbonisation.

2036–40: Consolidate sequestration to offset residual methane and protect competitiveness through trade and procurement safeguards.”

What are the expected costs of implementing these policies?

Many respondents highlight that the **costs of inaction** are significant (SCCS, RCPE, WWF Scotland, one individual) or that the costs of acting must be considered against a baseline of inaction, not against a baseline of current costs (RSPB Scotland, SCCS, NatureScot). NatureScot highlighted a number of costly threats from climate change and noted that:

“...The risks and associated costs embedded in the status quo need to be fully evaluated...”

More widely, it is important to set out potential costs of action against the likely costs of inaction, especially where current uses of the land and sea heighten vulnerability to climate risks.”

The RCPE emphasised that there are both health and environmental costs of inaction, mentioning diet-related disease, antibiotic resistance and pesticide exposure, air and water pollution, and food insecurity and loss of resilience. WWF Scotland pointed to its own research that extreme weather in 2017-18 caused £161m in losses to Scottish farmers.

Many respondents point to a need to **rethink and repurpose existing support** (SCCS, East Dunbartonshire Council, RESPECT project, RSPB Scotland, Nourish Scotland, Scottish Agroecology Partnership (SAP)).

SAP stated:

“Using this resource more strategically, with a greater share directed to regenerative practices and smaller producers, would improve value for money. Some additional public funding may be required in the transition phase for infrastructure, skills development and risk-sharing, but these costs

would be outweighed by long-term benefits in resilience, reduced input dependency and environmental recovery.”

Many respondents highlight the likelihood of initial upfront or capital costs, or wider financial risks to farmers who need to make changes to their business (e.g. through temporary productivity or yield losses) (Scotland Excel, RSPB Scotland, Stirling Council, NatureScot, Nourish, SAP, NFUS, QMS). However, several respondents also note that this is likely to be less costly or to bring savings over the longer term compared to the costs of inaction.

Several respondents refer to **specific cost estimates**, such as CCC costings (Public Health Scotland, RCPE), or [SRUC's recent report on the 'marginal abatement cost curves' for agriculture](#) (essentially a measurement of how cost effective different interventions are, e.g. their cost compared with their emissions saving) (RSPB Scotland).

WWF Scotland suggests that “research has predicted that Scotland’s land use sector will need £1.5-1.8billion annually over the next decade to meet climate and biodiversity objectives”. They suggest this means “public funds must be used strategically to leverage private finance and avoid crowding out commercial markets.”

They also argue that the Agricultural Transformation Fund should be increased to £100m annually across the next parliamentary term, and advisory funding rising to £20m annually by 2027. They further highlight the cost of modernising the IT system.

Highland Council provided a specific model for identifying costs:

“National Cost Model

- Develop benchmarks for slurry stores, AD, horticulture, venison processing, soil monitoring, and agroforestry.
- Include uplifts for remote Highland delivery.

Public Investment Pathways

- Rolling programmes for slurry/AD, horticulture hubs, venison processing, and soil carbon payments.
- Farm payment reform to reward carbon and food outcomes.

Private Finance Mobilisation

- Green loans and guarantees for AD and renewables.
- Co-operatives for shared AD, storage, and horticulture facilities.
- Carbon and biodiversity credits for agroforestry and soils.
- Public procurement contracts as bankable offtake for food.

- Community–private food hubs to embed value locally.”

They note that, from a Highland perspective, “costs per unit are higher, but modular and co-operative approaches reduce risk. A fair model must reflect these realities”.

What are the expected benefits of these policies?

The majority of respondents across different types of organisations (industry bodies, environmental groups, councils, public bodies) identified some expected benefits of climate change policies.

Most respondents noted that the main benefit is reducing emissions and avoiding the adverse impacts of climate change (SCCS, RSPB Scotland, Aberdeen City Council, Scotland Excel, Stockfree Farming, an individual, Highland Council, Stirling Council, NFUS, WWF Scotland, NatureScot, Anderson Bell + Christie Architects, RCPE).

Many identify on-farm benefits like improved efficiency (QMS), financial improvements if there are fewer inputs (RSPB Scotland, Highland Council, RESPECT project), reduced waste (Scotland Excel), resilience to climate impacts (NatureScot, Nourish Scotland, Highland Council, Stirling Council), and safer working environments (e.g. reduced pesticide exposure). Highland Council also noted potential opportunities, such as new revenues from anaerobic digestion, horticulture and venison.

QMS highlighted climate and environment benefits, and in terms of on-farm benefits stated:

“Economic/productivity: Faster finishing, fewer losses, higher yields. Trials show +17% beef and +32% lamb daily gains with MSS; greater resilience to drought and wet conditions. Lower vet costs and input savings.

“Social/health: Secure supply of nutrient-dense Scotch red meat, supporting iron and B12 intake. Rural employment sustained, with new skilled roles in advisory, planting and verification.

“Reputational: fairer, fuller picture of the multiple goods of agriculture to support a more proportionate approach to policy, customer and consumer decision-making. This in turn will support business confidence and prosperity.”

Other benefits mentioned include nature recovery and biodiversity benefits, a fairer, more sustainable and healthier food system, healthier lifestyles (e.g. through active travel), pollution reduction, food security, reduced antibiotic use, fair work and a just transition, greater connection through e.g. peer knowledge exchange benefiting farmers’ mental health, localised food systems, and new job opportunities. BEFS and Historic Environment Scotland stressed that there are mutual benefits to be gained for the natural and historic environment from well-designed policies.

Public Health Scotland highlighted links to public health benefits from policies which address climate change in agriculture:

“From a public health perspective, a range of health and health equity benefits could be realised through these policies through a number of pathways:

- “Policy actions that reduce emissions associated can contribute to slowing the rate of global warming and can reduce climate related health risks associated with adverse weather and other climate hazards [1].”
- Sustainable and regenerative farming practice, afforestation and agroforestry can support diverse ecosystems, improve soil health, water and air quality, reduce the reliance on chemicals that can be harmful to health and help maintain the resilience of the food system in the face of climate change [2,3].
- Increasing the provision of high quality, accessible natural environment through diversification in farming can support mental health, physical activity, and social connection. Emotional ties to nature, especially from childhood experiences can boost psychological wellbeing and foster a sense of identity and belonging [4].
- Good and fair work is a building block of good health [5]. Good work plays a key role in improving health and reducing health inequalities in Scotland [6]. Creating and maintaining employment opportunities in the agriculture sector is vital for the sustainability and wellbeing of rural and island communities.
- Community Wealth Building approaches to economic development in the agriculture sector offer an opportunity to improve health and help reduce some of the main causes of health inequalities by reducing poverty, improving working conditions, enhancing local environmental and access to amenities and strengthening community cohesion and resilience [7].”

Note that the references can be found in their response.

The organisation also warned, however, that co-benefits are not a given but can result from well-designed policies.

What do you think the key challenges would be in delivering these policies?

Many organisations emphasised that the **urgency required is a challenge**, and several (SCCS, RSPB Scotland, Stockfree Farming, Stirling Council, RCPE) raised that it is a challenge to agree rapid change with groups or sectors who benefit from, or are reliant on, aspects of the status quo.

RSPB Scotland highlighted:

“Getting farmer representative organisations properly on side to the extent that they are comfortable with more rapid change to the government’s financial support framework. These organisations will frequently talk about the

need for change, but then effectively slow it down by defending the status quo on key decisions. Without all interest groups being in the same place in terms of recognising the need for rapid change, the political friction slows the pace of change.”

The **most common challenge raised by respondents was cost and resources, including financial risk**, particularly in the context of low average farm incomes and uncertainties around funding and ensuring that financial incentives are sufficient (Aberdeen City Council, Scotland Excel, Public Health Scotland, Highland Council, NFUS, RCPE, WWF Scotland, QMS). WWF Scotland further noted that “the increasing frequency of extreme weather events will raise baseline costs and risks if adaptation and resilience-building are not integrated into policy delivery”.

Several respondents also raised that the changes required **challenge cultural norms**, and there can be path dependencies which result in difficulty making changes (one individual, Highland Council, RESPECT project, RCPE).

Other commonly raised challenges among respondents included:

- **Barriers to uptake and implementation**, and capacity limitations (e.g. in peatland restoration) (Aberdeen City Council, Scotland Excel, NatureScot, WWF Scotland, QMS).
- Need for **rapid upskilling** (Aberdeenshire City Council, Highland Council, RCPE).
- **Access to data and measurement tools** (Scotland Excel, Highland Council, WWF Scotland, QMS).
- **Balancing climate priorities with other essential needs** and perceived tensions between these different needs (e.g. food security) (Scotland Excel, NatureScot, QMS).
- **Supply chain and infrastructure** challenges and inequities (Highland Council, NFUS, RCPE).

How could these policies support a Just Transition for workers and communities?

Many respondents raised that care needs to be taken to **ensure that farmers, and particularly smaller farmers are supported to transition** to more sustainable business practices, to diversify and to adapt to the adverse effects of climate change (East Dunbartonshire Council, Aberdeen City Council, Stockfree Farming, RCPE, RESPECT project, Nourish Scotland, WWF Scotland, Highland Council).

NFUS highlighted that “Policies must be inclusive and co-designed with farmers and crofters so they are bought into the vision and aims of what is trying to be achieved.”

Respondents highlighted that **supporting smaller farmers** is particularly important in a just transition. The RESPECT project stated that:

“A just transition in agriculture means ensuring that farmers of all scales, types, and tenures can participate and benefit. The policies must be designed to be accessible, providing enhanced support for small farms, new entrants, crofters, and tenants who face the biggest barriers. This prevents a situation where only the most resource-rich landowners can profit from ‘nature-based solutions’.”

Moreover, Highland Council raised that there are **important cultural traditions that need to be respected**, including crofting and common grazing. They note that it is important to protect crofts from disproportionate costs, and that “a just transition means crofting remains viable, with new income from horticulture, venison and AD [anaerobic digestion]. Communities gain affordable food and energy, jobs, and resilience to climate change.”

Nourish Scotland raised that the current system of farm payments does not support a just transition because **large amounts of funding go to a smaller number of bigger producers**. They argued:

“We need to ensure farm subsidy payments are capped and resources redistributed to smaller food producers by increasing support for the first hectares farmed. In particular, we’d like to see a dedicated Market Garden Support Scheme to provide fair funding for small-scale fruit and vegetable growers currently excluded from payments.”

NFUS raised the need to ensure that **producers in less favoured areas** are not left behind:

“On our path to net zero, we cannot risk or neglect our Less Favoured Areas in Scotland. These are crucial farming systems which bring immense climate and biodiversity benefits. They also underpin rural communities. Specific and targeted support for these marginal and remote areas is essential for a Just Transition.”

Respondents also raised the need for:

- Opportunities for **upskilling and innovation** (Scotland Excel, NatureScot, Stockfree Farming, NFUS, WWF Scotland, Highland Council) including creating new skilled jobs, e.g. in advisory services, restoration, fencing, verification and processing upgrades (QMS).
- Investment in **local supply chains** (Scotland Excel, Highland Council).
- Access to **healthy, locally sourced food** (Scotland Excel), including to tackle diet-related disease and food insecurity (RCPE).
- Protecting **seasonal and migrant workers** (RCPE).
- **Involving communities** (RCP Air Pollution Working Group) and ensuring that they benefit from value generated, e.g. from natural capital (WWF Scotland).

- Ensuring **Scotland remains competitive** internationally and rewarding verified performance through **public procurement** of Scottish products (QMS).

RCP Air Pollution Working Group summarised that:

“A Just Transition in agriculture is not just about changing how we farm, it’s about who benefits, who is protected, and who gets to shape the future of food, health and land in Scotland.”

Finally, [ClimateXChange submitted the results of its deliberative research](#) on a “fair distribution of costs and benefits in Scotland’s just transition”. The research found:

“To ensure a fair transition, in which everyone benefits, it was suggested that:

“People’s ability to pay is taken into account, with protection in place for low-income consumers.

“Farms are subsidised, favouring smaller farms with less income. Support payments should be specifically allocated towards covering the costs of reducing carbon emissions.

“Farms should be given sufficient time and opportunity to change and reduce emissions before introducing any financial impacts such as additional tax.

“Ensure that consumers have easier access to sustainable food options.”

Anna Brand, Senior Researcher, SPICe

4 November 2025

Table of acronyms used to refer to organisations

Acronym	Full form of respondent
C2050	2050 Climate Group
ABCA	Anderson Bell & Christie Architects
ACC	Aberdeen City Council
AGS	Auditor General for Scotland
ALLIANCE	Health and Social Care Alliance Scotland
BE-ST	Built Environment Smarter Transformation
BEFS	Built Environment Forum Scotland
BHHPA	British Holiday & Home Parks Association
CCAN	Cardross Climate Action Network
No acronym used	Climate Cafe Shetland
CEP	Centre for Energy Policy, University of Strathclyde
CERG	Climate Emergency Response Group
CIAT	Chartered Institute of Architectural Technologists
CITB	Construction Industry Training Board
No acronym used	Colleges Scotland
CreScot	Creative Scotland
CS	Consumer Scotland
No acronym used	Culture for Climate Scotland
CXC	ClimateXChange
No acronym used	Cycling UK
No acronym used	Edinburgh Communities Climate Action Network
EDC	East Dunbartonshire Council
EHA	Existing Homes Alliance
EMEC	European Marine Energy Centre
EST	Energy Saving Trust
FDFS	Food and Drink Federation Scotland
FES	Future Economy Scotland
FOES	Friends of the Earth Scotland
GCC	Glasgow City Council
GGM	Get Glasgow Moving
HC	Highland Council
HES	Historic Environment Scotland
HfS	Homes for Scotland
IKEA	IKEA Ltd
IPPR Scotland	Institute for Public Policy Research Scotland
No acronym used	Liquid Gas UK

No acronym used	Logistics UK
RESPECT project	LUNZ Hub RESPECT Project
MCS	The MCS Foundation
NECCUS	North East Carbon Capture Utilisation and Storage
NESTRANS	Nestrans (Regional Transport Partnership for Aberdeen City & Aberdeenshire)
NHS Lothian	National Health Scotland Lothian
NFUS	National Farmers Union Scotland
NS	NatureScot
No acronym used	Nourish Scotland
No acronym used	Orkney Islands Council
No acronym used	Paths for All
No acronym used	Peat-free Partnership Scotland Advocacy Group
PHS	Public Health Scotland
No acronym used	Perth and Kinross Council
No acronym used	Propertymark
PS	Police Scotland
QS	Quakers in Scotland
QMS	Quality Meat Scotland
RCPE	Royal College of Physicians Edinburgh: Air Pollution Working Group and Climate Café
RICS	Royal Institution of Chartered Surveyors
RMT	National Union of Rail, Maritime and Transport Workers
RSPB Scotland	Royal Society for the Protection of Birds Scotland
SAP	Scottish Agroecology Partnership
SC	Scottish Care
SCCS	Stop Climate Chaos Scotland
SE	Scotland Excel
SCIS	Scottish Climate Intelligence Service
SEDA	Scottish Ecological Design Association
SEPA	Scottish Environment Protection Agency
SEStran	South East Scotland Transport Partnership
SF	Stockfree Farming
SLC	South Lanarkshire Council
SPT	Strathclyde Partnership for Transport
SRAEHL	Scottish Research Alliance for Energy, Homes and Livelihoods
No acronym used	Seafood Scotland
SSN	Sustainable Scotland Network

StC	Stirling Council
SuSc	Sustrans Scotland
SWA	Scottish Wholesale Association
TACTRAN	Tayside and Central Scotland Transport Partnership
No acronym used	Transform Scotland
UKERC	UK Energy Research Centre
UoGSoL	University of Glasgow, School of Law
UWE Bristol	University of the West of England Bristol
WWF Scotland	World Wide Fund for Nature Scotland