

Dear Convener and Members of the Rural Affairs and Islands Committee,

I am writing on behalf of the Scottish Agroecology Partnership (SAP) following the Committee's debate on Wednesday on the Fruit and Vegetables Aid Scheme Statutory Instrument (SSI), which did not pass through the committee.

We recognise the argument made in the debate that the SSI provides *stability for fruit and vegetables grown in Scotland only*, and that continuity matters for growers operating in a volatile market.

However, we remain concerned that the SSI, even if stabilising in the short term, risks locking Scotland into an approach that is too narrow, insufficiently ambitious, and poorly aligned with the wider direction of agricultural reform, particularly when public money is scarce and the need to support wider rural community and natural resource outcomes is urgent.

SAP is a partnership of organisations and producers working towards a fair, climate-resilient and nature-friendly food system in Scotland, including many small and medium-scale horticultural businesses, crofts and market gardens. Many of our members and representative organisations responded to the Scottish Government consultation, and we welcomed publication of the analysis. Our concerns now relate to what happens next if passed in the main chamber as is, and what this SSI effectively *delays* in terms of national progress.

1) Stability cannot be the end point: The consultation evidence given is still unmet

The consultation analysis records strong support for:

- Dedicated support for smaller growers and market gardens who do not meet current Producer Organisation (PO) criteria.
- A more accessible/support to access, new or separate scheme for small-scale producers supplying local and regional markets.
- Better alignment with the Good Food Nation (Scotland) Act, the Local Food Strategy, and the Agriculture and Rural Communities Act.

Yet, if passed, the scheme will remain essentially PO-focused. While we understand the Government's position on continuity and administrative feasibility, there is still no concrete roadmap, timeline, or design commitment for a complementary Scottish scheme that supports the growers who underpin local supply chains and deliver public goods on climate and nature.

2) The key question now: Is the associated match funding the best use of scarce public resources?

A critical theme that sits underneath today's discussion is value for money and opportunity cost.

It is our understanding that this SSI is linked to *around £3 million* of associated match funding. Even if the precise figure varies year to year, the strategic question remains the same: **is directing this level of public resource through a highly restricted mechanism the best way to support Scotland's food producers, especially those delivering climate mitigation, adaptation, soil health and biodiversity?**

We would encourage the Committee to seek clarity from Ministers and officials on:

- The total quantum of public funding and match funding tied to the scheme during the SSI period.
- Who benefits (in practice) and what outcomes are being bought.
- Whether alternative or complementary mechanisms could deliver wider benefit across Scotland's horticulture sector (particularly for smaller and newer entrants) without waiting years for change or chance.

For clarity, we fully support the public subsidy for fruit and veg production in Scotland and do not believe that the budget should be reduced, but we believe the mechanism is horribly outdated and inappropriate for the Scottish context.

3) Only hope remains: That the next three years can deliver something more interesting than managed delay

We note that the direction of travel implied is “wait and see” until later in the decade. We hope that, within three years, Scotland is able to bring forward something more ambitious and better targeted; because, at present, the wider Agricultural Reform Programme (ARP) remains disappointing, uninspiring, and at times embarrassing in terms of the pace and clarity of progress post-CAP. While we acknowledge Minister Jim Fairlie's desire to avoid a 'big bang' in favour of a stable transition that brings everyone along, it is deeply disappointing to anchor our nation's progress to the most recalcitrant few doing the bare minimum, particularly when the needs of future generations extend far beyond BPS.

Horticulture could and should be an obvious “quick win” for visible progress: healthier diets, rural jobs, short supply chains, resilience, and measurable biodiversity and climate outcomes. Scotland's small and medium producers are ready to deliver; if the support architecture is designed to include them.

What we are asking the Committee to do now

In light of today's vote, we would be grateful if the Committee could bring to attention in the main chamber debate:

- **Work with the Minister to achieve a practical compromise to amend the SSI to introduce a sunset clause;** this will guarantee that the current model runs for one final iteration before being replaced by a fully devolved, controllable scheme that properly encompasses the needs of Scotland's modern, future-facing horticultural market.
- **Request a clear, timebound roadmap** from Ministers for a complementary Scottish fruit and veg support scheme that works for smaller and medium-scale producers (market gardens, crofts, CSAs and collaborative models), aligned with Good Food Nation and ARC objectives.
- **Scrutinise value for money:** seek detail on the full public and match-funding envelope linked to the scheme, who benefits, and what outcomes are expected, alongside options for broader benefit across the sector. We cannot stress that this needs to be viewed through the lens of achieving the ARC objectives, in a timely manner.
- **Seek clarity on legal powers and constraints,** including whether the “recognition criteria” issue is being used as a barrier to designing a separate Scottish scheme under devolved competence.

SAP and our member organisations would be very willing to provide oral evidence or written input to support the Committee in this scrutiny, and to help shape a scheme that better serves Scotland's diverse horticulture sector while delivering climate and nature outcomes.

Thank you for your consideration and for the Committee's work scrutinising agricultural reform.

Yours sincerely,

Nim Kibbler on behalf of the Scottish Agroecology Partnership