THE SCOTTISH REWILDING ALLIANCE

c/o Trees for Life
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Dear Mark Ruskell MSP

Following my evidence to the Rural Affairs Committee on Wednesday 9 September 2026, I am pleased to provide this additional information.

During the session, I offered to write to the Committee with detailed evidence on two critical policy areas currently missing from the Scottish Government's proposed Rural Support Plan: international models where strategic land use agreements have been achieved through co-design, and evidence relating to the realities and risks of an over-reliance on private finance. I have also provided additional detail on the definition of 'active farmer'.

1. International case studies

A recurring concern during the round-table evidence session was that Scotland's Rural Support Plan maintains legacy Common Agricultural Policy (CAP) mechanisms, leading to a "plan of inertia" that fails to deliver land-use transition, climate adaptation, or biodiversity recovery. To overcome this, Scotland can draw on proven governance and payment frameworks implemented across Europe in developing its own approach.

Below, I have provided 4 case studies that reflect the different elements currently lacking from Scotland's Rural Support Plan: co-design principles, public goods, results-based payments and collaborative payments.

A. Co-design and watershed-scale planning: The Danish "Green Tripartite" Agreement (Aftale om et Grønt Danmark)

In response to stagnating environmental progress, Denmark established a structural framework to transition its landscape while keeping agriculture viable and competitive. Rather than relying on narrow advisory boards, Denmark brought together agricultural unions, environmental NGOs, industrial supply chains, and municipal authorities into a single forum to broker an agreement.

The Agreement for a Greener Denmark establishes dedicated funding to transition lower-grade or carbon-rich agricultural land into forests, wetlands, and natural habitats, targeting 250,000 hectares of afforestation and peatland rewetting. It introduces the world's first agricultural carbon emissions and tax framework, coupled with explicit public reinvestment packages to de-risk farm business transition and incentivise low-input, nature-based systems.

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Denmark demonstrated that high-level consensus can be achieved when the government defines desired public outcomes first and brings all land-use interests together to negotiate spatial and financial solutions, rather than leaving land uses to compete in the market. The delivery of the agreement will take place through collaborative planning by 23 'local tripartites' focused at watershed level.[1]

B. Public goods and outcomes framework: Switzerland

Switzerland systematically reformed direct agricultural payments by shifting from historical production baselines to a legally defined "public goods" framework. Before receiving basic state support, farm businesses must satisfy baseline environmental standards covering soil protection, biodiversity corridors, and animal welfare. Basic support is explicitly separated from landscape quality and biodiversity payments. Farmers who allow dynamic natural regeneration, scrub creation, or high-biodiversity habitats receive higher per-hectare tier rates, rather than facing land eligibility penalties.

Under Scotland's proposed Rural Support Plan, a farm restoring a significant proportion of its area to native scrub and wetlands currently risks losing basic direct payments (Tier 1) due to rigid definitions. Switzerland demonstrates how land managers can be financially rewarded, rather than restricted, when dedicating land to high-value natural ecosystem services.[2]

C. Results-Based Payment Scheme: The Burren Programme, Ireland

The Burren Programme (now expanded under the national ACRES scheme) pioneered a Result-Based Payment Scheme (RBPS) that bypasses traditional prescriptive management rules.Farmers are paid directly based on an annual field-level ecological score (1 to 10). High-scoring fields rich in biodiversity, clean water, and healthy soil receive the maximum financial reward, while low-scoring fields receive lower levels of funding.

Scotland piloted an innovative approach to delivering environmental outcomes on farms and crofts during 2019 to 2022 through Piloting an Outcomes Based Approach in Scotland (POBAS)[3], but this approach was never embedded into mainstream funding or tested at scale.

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[1] https://onlinelibrary.wiley.com/doi/full/10.1111/1746-692x.70017

[2] https://www.oecd.org/en/publications/policies-for-the-future-of-farming-and-food-in-switzerland_55cf64da-en/full-report/natural-resources-management-and-environmental-sustainability_aa70c494.html

[3] https://www.nature.scot/professional-advice/social-and-economic-benefits-nature/natural-capital/farming-nature/piloting-outcomes-based-approach-scotland-pobas

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D. Collective payments: Netherlands

The Netherlands transformed its delivery of agri-environment funding by replacing individual 5-year farm contracts with regional farmer co-operatives. Agreements of 12 to 20 years are brokered at the collective regional level, with rolling operational contracts for individual member farms. The collective acts as the primary contractor, managing spatial planning, habitat connectivity, and parcel allocation across neighboring farms to support long-term landscape restoration.[4]

2. Private finance: realities and risks

The Scottish Government's approach to rural payments suggests that lower public allocations for Tiers 3 and 4 will be supplemented by private natural capital markets. Significant investment in Tier 3 schemes has been delayed to 2030. Private natural capital will not mature quickly enough across all Scottish regions to bridge this four-year gap. Expecting private markets to replace public support before 2030 will lead to project abandonment and stop new ones from even getting off the ground.

While we actively advocate for high-integrity private investment, relying on private capital as a substitute for public funding deficits is, as I said in the committee session, "extremely risky and unlikely to happen". Rewilding Britain's *Rewilding Finance* report[5] and the experiences of their Rewilding Network members suggest that:

- Voluntary carbon and biodiversity credit markets in Scotland remain highly fragmented. They lack standardised metrics, triggering high transaction costs that exclude smaller holdings, crofters, and tenant farmers.
- Natural capital revenues fluctuate based on global carbon pricing and corporate demand. Farm and estate businesses cannot build long-term economic stability, plan long-term ecological restoration projects or retain staff on volatile markets alone.
- Unregulated private finance naturally gravitates toward single-yield assets (such as commercial softwood forestry) rather than complex, long-term mosaic rewilding (wood-pasture, scrub, wetland restoration) which delivers far broader public benefits (flood mitigation, biodiversity recovery).
- High-barrier private natural capital deals frequently favor large institutional landowners, exacerbating tenure inequality and bypassing crofting townships and smallholders who lack upfront capital to enter these markets.

[4] https://console-project.eu/Nuevos_deliverables/NL1_fin_2022.pdf
[5] https://www.rewildingbritain.org.uk/about-us/what-we-say/research-and-reports/rewilding-finance

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- Efforts to address this, such as the Ecosystem Restoration Code, have developed slowly and show no sign of addressing the wider structural issues of an over-reliance on private capital.

To safely mobilise private capital alongside public investment, the Committee should recommend that the Scottish Government:

- Recognise that core rewilding and nature recovery activities, such as habitat connectivity, species reintroductions, natural flood management, natural grazing, and scrub creation, yield immense public value but offer no direct private revenue stream. These must be underwritten by public grants in Tiers 3 and 4 rather than left to market speculation.
- Establish clear rules allowing land managers to blend Tier 3 and 4 public payments with private ecosystem markets (e.g., carbon credits, habitat banking) without double-funding penalties, while mandating standards to prevent greenwashing, prohibit perverse incentives, and ensure crofters, smallholders, and local communities retain fair access and governance over the land.

3. Active farmer definition

During the committee session, I raised that the rigid definition of an 'active farmer' is secondary to whether the intended public outcomes of funding are actually being achieved.

The Future Farming Investment Scheme (FFIS) provides a clear example: it incentivises the creation of habitats such as hedgerows, ponds, and lightly grazed land alongside investments to improve farm efficiency and sustainability. Clearly, these are habitats the Scottish Government wishes to see created because they deliver vital ecological functions and climate adaptation. Yet any land manager who transitions away from purely intensive agricultural production toward creating dynamic, self-sustaining ecosystems risks being excluded from all payments because they no longer fit the traditional, production-centric definition of an "active farmer".

Under the EU's Common Agricultural Policy (CAP) framework, the "active farmer" test was introduced to prevent non-farming entities from claiming land subsidies simply because they owned agricultural land. When Scotland removed the "negative list" in 2018 to simplify administration, verification defaulted to physical production indicators, most notably strict minimum livestock stocking densities (e.g., 0.05 LU/ha on rough grazing). Consequently, a land manager who reduces stocking rates to allow natural woodland regeneration, peatland rewetting, or scrub establishment risks falling below these activity thresholds and being audited as no longer an active farmer.

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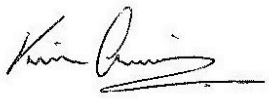
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Regulation (EU) 2021/2115 of the European Parliament and of the Council says: "To ensure a better income, strengthen the socio-economic fabric of rural areas or pursue related objectives, the definition of 'active farmer' should not preclude the granting of support to pluri-active or part-time farmers who in addition to farming are also engaged in non-agricultural activities." Most member states verify active status through administrative, social security or legal trade registers rather than livestock headcounts.[6] In the handful of states that maintain minimum stocking densities, minimum activity requirements can also be demonstrated through habitat maintenance contracts or ecological exemptions.[7]

By maintaining traditional, production-focused eligibility tests in Scotland, the Rural Support Plan would trail behind both modern EU flexibility and post-Brexit UK practices.

Thank you again for the opportunity to give evidence to the committee.

Kind regards



Kevin Cumming

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Rewilding Director, Rewilding Britain

[6] See, for example, Germany's requirement that a land management entity proves it is actively operated through statutory association membership or insurance provision: https://www.landwirtschaftskammer.de/foerderung/hinweise/direktzahlungen.htm#aktiv

[7] See, for example, Ireland's accommodation of woodland creation and habitat within active farming activities https://assets.gov.ie/static/documents/09fe3ad4/2026_BISS_and_Other_Area_Based_Schemes_T_and_Cs_Version_6_24th_Aug_2026_3.pdf