RURAL AFFAIRS, CLIMATE CHANGE AND ENVIRONMENT COMMITTEE

AGENDA

9th Meeting, 2014 (Session 4)

Wednesday 26 March 2014

The Committee will meet at 10.00 am in Committee Room 2.

1. **Decision on taking business in private:** The Committee will decide whether to take item 3 and 4 in private. The Committee will also decide whether its consideration of its work programme should be taken in private at its next meeting.

2. **The Scottish Government’s implementation of the Common Agricultural Policy and Scotland Rural Development Programme 2014-20:** The Committee will take evidence from—

   Richard Lochhead, Cabinet Secretary for Rural Affairs and the Environment, David Barnes, Deputy Director, Agriculture and Rural Development, and Drew Sloan, Chief Agricultural Officer, Scottish Government;

   Dr Jenny Johnson, Policy and Advice Manager, Scottish Natural Heritage.

3. **The Scottish Government’s implementation of the Common Agricultural Policy and Scotland Rural Development Programme 2014-20:** The Committee will consider the evidence it has received.

4. **Standards, Procedures and Public Appointments Committee inquiry into the procedures for considering legislation:** The Committee will consider a draft response to the inquiry.

Lynn Tullis
Clerk to the Rural Affairs, Climate Change and Environment Committee
Room T3.40
The Scottish Parliament
Edinburgh
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The papers for this meeting are as follows—

**Agenda item 2**
Note by the Clerk
PRIVATE PAPER

**Agenda item 3**
PRIVATE PAPER
Introduction

1. In agreeing its work programme on 11 December 2013, the Committee agreed to take evidence on the implementation of the newly reformed CAP in Scotland (both the direct payments of pillar 1 and the rural development SRDP funds of pillar 2) in 2014, both of which are currently subject to consultation by the Scottish Government.

2. In addition, the UK Secretary of State, Owen Paterson MP, is scheduled to give evidence to the Committee on CAP, and other relevant matters within his portfolio, on 23 April 2014.

3. The Committee agreed the details of its CAP and SRDP scrutiny at its meeting of 5 February 2014.

Background

4. In this session of Parliament, the Committee has scrutinised the reform of the CAP extensively. Previously, this focussed on the negotiations at an EU level, with the Committee taking a wide range of written and oral evidence from UK Ministers, the Scottish Cabinet Secretary, MEPs, European officials, and stakeholders, and reporting its views to the Scottish Government.

5. Having completed a first phase of consultation last year, the Scottish Government currently has two open consultations on CAP and SRDP issues—

   - Scottish Government consultation on Future CAP direct payments in Scotland from 2015\(^1\) - end 17 March 2014; and

   - Scotland Rural Development Programme (SRDP) 2014-2020 Stage 2: Final Proposals – end 28 February 2014\(^2\).

6. In November 2013, the Scottish Parliament Information Centre (SPICe) published a briefing paper entitled "CAP Reform 2014–20: EU Agreement and Implementation in the UK and in Ireland".\(^3\)

Sustainable development

7. The Committee is committed to embedding consideration of sustainable development issues in all of its work. With that in mind, and given that this

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round of CAP reform includes the policy objectives of ‘viable food production, sustainable management of natural resources and climate action’, and that the new payments architecture is intended to be ‘more equitable and greener’\(^4\), the issue of the future allocation of agricultural and rural development support in Scotland is particularly relevant to sustainable development. The Committee will therefore be considering sustainable development issues as part of its scrutiny.

**Call for written views**

8. As the Scottish Government is currently conducting two consultations the Committee has not issued a general call for written views. However, organisations which have been invited to give oral evidence have been given the option to either send the Committee a copy of their submission to the Scottish Government, for reference, or to send the Committee a brief summary, or update, of their position.

9. Organisations which have not been invited to give oral evidence are also welcome to submit a copy of their submission to the Scottish Government, for reference, or to send the Committee a brief summary of their position.

10. Written submissions received to date have been published online\(^5\). Written submissions received since the Committee’s meeting on 5 March 2014 (from Archaeology Scotland; RSPB Scotland; Scottish Crofting Federation; and Scotland’s Rural College) are attached at the [Annexe](http://www.scottish.parliament.uk/parliamentarybusiness/CurrentCommittees/73538.aspx).

**Witnesses for oral evidence**

11. The Committee took oral evidence from stakeholders at meetings on 26 February\(^6\) and 5 March 2014.\(^7\)

12. The Committee will continue its evidence taking by hearing from the Cabinet Secretary for Rural Affairs and the Environment and his officials on 26 March 2014.

13. The Committee was scheduled to take evidence on CAP, and other matters, from the UK Secretary of State for Environment, Food and Rural Affairs, at its meeting on 12 March 2014, but unfortunately the Secretary of State was unable to attend because of being required to attend the House of Commons at short notice. This session has now been rearranged for 23 April 2014.

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Output

14. At the conclusion of its evidence taking, the Committee will write to the Scottish Government giving its views on the roll out of both pillars of the CAP in Scotland from 2015 onwards. The Committee will consider a draft letter at its meeting on 30 April 2014.

Clerks/SPICe
Rural Affairs, Climate Change and Environment Committee
Written submission from Archaeology Scotland

Our ‘Opportunities for Scotland’s Rural Heritage 2014-2010’ report\(^8\) promotes the role Scotland’s heritage in the next Common Agricultural Policy (CAP) and Scotland Rural Development Programme (SRDP) 2014-2020. There are opportunities outlined here that will benefit land managers, the Scottish public and also support Scottish Government policies and objectives, particularly now that Scotland’s first Historic Environment Strategy will be launched imminently.

We realise that the environmental focus under CAP and SRDP is on biodiversity and climate change but it would be good if the RACCE Committee would also consider wider implications for landscape and heritage through these programmes. There are wider synergies for rural communities in supporting outcomes beyond a focus on production.

Written submission from RSPB Scotland

Summary

- RSPB Scotland is deeply disappointed with the budget and that Government chose to transfer only 9.5% using the flexibility mechanism - we called for the full 15%.
- The assessment process must be designed to select and accept applications which aim to provide the greatest environmental benefit. We recommend that applications with options to support iconic species and designated sites are assessed by SNH.
- **The SRDP should support High Nature Value (HNV) farming systems.** LFASS does not provide value for money as it provides very little environmental benefit.
- We see the potential of the Agri-Environment-Climate scheme but are concerned about the lack of details in the proposals and the insufficient budget. We believe a minimum of £60m per year is needed.
- We are quite satisfied with proposals for the Forestry Grant Scheme. This scheme must improve the biodiversity value of existing woodlands and ensure woodland creation enhances the environment. New woodland must be designed and located to ensure biodiversity protection and not compromise other SRDP objectives.
- We welcome the inclusion of a cooperation fund into the scheme and the increased role for advice provision. However, we are concerned that the budgets will be insufficient and want to see more details regarding how these elements will be implemented.

Introduction

RSPB Scotland welcomes the opportunity to respond to this consultation on the future of land management grant schemes for Scotland. This is a paper

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\(^8\) [http://www.archaeologyscotland.org.uk/sites/default/files/pdfs/Opportunities%20for%20Rural%20Heritage%20report%20Nov%202013.pdf](http://www.archaeologyscotland.org.uk/sites/default/files/pdfs/Opportunities%20for%20Rural%20Heritage%20report%20Nov%202013.pdf)
version of our response given via the Scottish Government’s internet-based response form.

Our response to the Stage 1 consultation can be downloaded⁹.

RSPB Scotland¹⁰ is part of the RSPB, which speaks out for birds and wildlife, tackles the problems that threaten our environment and promotes the conservation of wild birds and their habitats. We are supported by nearly 90,000 members in Scotland, with a strong membership base in rural areas as well as in towns and cities. We have practical experience of managing terrestrial, aquatic and coastal habitats for conservation, farming, forestry and other enterprises, and of providing advice to land managers. RSPB Scotland manages more than 68,000 hectares of land, much in management agreements with local farmers, crofters and graziers. Our land management interests cover a wide range of habitats and geographic areas within Scotland. We undertake biological and economic research to underpin our policy analysis and advocacy. We also have experience of environmental education and training for all ages. The RSPB is the BirdLife International partner in the UK.

[This is RSPB Scotland’s response to the Scottish Government’s consultation on the Scotland Rural Development Programme (SRDP) 2014 – 2020, Stage 2: Final Proposals]

SECTION 4 – BUDGET FOR SRDP 2014 - 2020

Question 1
How would you rate your satisfaction with the budget as a whole?

Very satisfied
Quite satisfied
Neither satisfied nor dissatisfied
Quite dissatisfied
Very dissatisfied

RSPB Scotland is deeply disappointed with the SRDP budget and consider it a bad deal for wildlife-friendly farming. With Scottish Environment LINK we called for Government to use the flexibility mechanism under CAP rules to transfer the full 15% of funds from Pillar 1 to Pillar 2¹¹. Government chose to transfer only 9.5% which results in the SRDP budget being approximately £220m lower than what it could have been.

As we explain in answer to Question 3 below, we believe the LFASS budget is too large, especially in comparison with the Agri-Environment-Climate (AEC) budget (£355m). The AEC budget includes £15m of money for peatland restoration already announced by Government. £340m split over 7 yrs amounts to £48.5m. We recommend a budget of at least £60 million per

¹⁰ The Royal Society for the Protection of Birds (RSPB) is a registered charity: England and Wales no. 207076, Scotland no. SC037654
annum or £420m as the very minimum required to meet biodiversity, water quality and climate change objectives and targets. The budget of £48.5m per annum appears to be an increase on the current scheme, however, in reality this returns the budget to levels prior to cuts imposed by the Scottish Government.

SECTION 5 – RURAL REGIONAL DELIVERY PARTNERSHIP FOR LAND
BAED INVESTMENTS

Question 2
Are you broadly satisfied with the new application and assessment process for land based investments outlined in section 5?

Very satisfied
Quite satisfied
Neither satisfied nor dissatisfied
Quite dissatisfied
Very dissatisfied

RSPB Scotland is concerned that the SRDP assessment process must be designed to select and accept applications which aim to provide the greatest environmental benefit. The process must include agreed selection criteria, agreed prioritisation at a regional level, and a transparent scoring system.

RSPB Scotland’s concerns with the application and assessment process relate to the quality of agreements being approved rather than the ease of access per se. For example:

- We strongly question the ability of RPID officers, who in many cases lack environmental expertise or qualifications, to assess the quality of some types of application. **We recommend that applications which include options for iconic bird species 12, in addition to those in designated areas, should be assessed by SNH rather than RPID case officers.**

- We recommend that the eligibility of applications containing specific Agri-environment-climate options and Forestry Grant Scheme options is endorsed by a recognised conservation body (this has been proposed in the development of some Agri-environment-climate options). RSPB Scotland would welcome the opportunity to support the SRDP and applicants in this way in order to ensure options are located where they are needed and appropriate.

- We are concerned that the expert panel at a national level will not have the necessary local knowledge to make the best decisions. We recommend that these decisions be made at a regional level.

- We believe that the £75k and £750k for forestry bandings, be lowered for the Level 2 applications. We are concerned that significantly large

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12 SNH’s Iconic species list.
applications which may offer poor value for money may be approved by one case officer only. To reduce this risk we recommend a reduction in the value of applications which must go to the Level 2 to £50K and £500K for forestry. We remain wedded to the need for clear priorities and criteria for assessment but believe a lower cut-off level would reduce the risk of high cost low value contracts.

We are concerned with the proposals for application limits, i.e. a single application per applicant for each scheme per year. This will be overly restrictive to land managers who have more than one significant holding but one farm code. Land manager with large areas of land outside designated sites and with more than one holding will, for example, only be allowed to apply for once per year to the Agri-Environment-Climate scheme even if they have the capacity to submit a number of high quality applications. We believe that targeting and improved scoring of applications should ensure that the best applications are approved, irrespective of who makes those applications. The application and assessment process shouldn’t be about spreading the money across the farming community but about delivering the best outcomes.

SECTION 6 – FUTURE SUPPORT FOR LESS FAVOURED AREAS (LFASS)

Question 3
Should support for farmers operating in constrained areas be continued through the SRDP?

Yes
No
Other, please specify (in the space given in the online questionnaire).

We accept, in principle, the need to support farmers operating in constrained areas through the SRDP. However, we believe that support should be targeted at the most economically disadvantaged and environmentally important farms within the uplands of Scotland, i.e. High Nature Value farming systems. The current LFASS results in higher levels of support going to the more productive and least disadvantaged areas in the LFA; this is counter to the spirit and intentions of the EU regulations and fails to provide support to where it is most needed. In addition, LFASS does not require recipients to meet environmental conditions.

The proposal to allocate at least 35% of the SRDP budget to such a poorly targeted and ineffective scheme is, in our view, to the detriment of the new Programme and constrains expenditure on other measures which can yield more beneficial outcomes. We wish to see the redesignation to ANC, and the introduction of a more effective support scheme, undertaken as soon as possible.

SECTION 7 – NEW ENTRANTS SCHEME

Question 4
How would you rate your satisfaction with the proposals for the New Entrants Scheme?
RSPB Scotland recommends that the New Entrants Scheme ensures that beneficiaries are guided towards environmentally sustainable businesses. It is essential that applications are assessed on their environmental impacts, rather than focussing entirely on the likely economic benefit to Scotland.

SECTION 8 – CROFTING & SMALL FARM SUPPORT SCHEME

Question 5
Should a scheme be expanded to provide capital support to small farms

Yes/No/No opinion.

We recognise crofting as a distinct form of land tenure in Scotland which has helped to create and maintain a rich and varied natural environment, as well as support rural communities in some of the most remote regions. Crofting faces numerous challenges however, and we believe there is some merit in a crofting specific support scheme. Our preference is for an integrated scheme which brings together general agricultural support measures, such as those under the current CCAGS, with agri-environment support in order to encourage and maintain environmentally beneficial crofting systems. Funding to encourage the establishment of Grazings Committees and the production of Land Management Plans for Common Grazings, should be an integral part of this. If such an integrated scheme is not possible, we would accept some on-going capital support to crofts, of the nature currently provided by CCAGS, in order to help crofting continue. Under this scenario, we believe greater effort will also need to be made – through the application process and advisory services – to help crofters access agri-environment and other SRDP schemes. As noted above, support for Grazings Committee will also be important.

We have reservations about extending capital support and making it available to all small farms between 3 and 50ha across Scotland. Whilst some small farms face the same disadvantages and challenges as crofts, e.g. located in remote areas with higher production and investments costs, many do not, nor do they display the same characteristics as crofting which is widely regarded as socially, culturally and environmentally important. We therefore make a distinction between crofts and small farms.

We do acknowledge however that there have been difficulties for small farms in terms of accessing other SRDP funding in the past; we believe this can be improved in the new SRDP through the application process and supporting advisory services, without the need for a specific scheme for small farms.
Question 6
Is a 3 to 50 hectare range appropriate for defining a small land holding?

Yes/No/No opinion

Question 7
Do you agree with the proposal for grants of £500 to be available to assist the establishment of Grazings Committees?

Yes/No/ No opinion

Question 8
How would you rate your broad satisfaction with the proposals for the Crofters and Smallholders Scheme?

Very satisfied
Quite satisfied
Neither satisfied nor dissatisfied
Quite dissatisfied
Very dissatisfied

SECTION 9 – AGRI-ENVIRONMENT-CLIMATE SCHEME

Question 9
How would you rate your broad satisfaction with the proposal for the Agri-Environment-Climate Scheme?

Very satisfied
Quite satisfied
Neither satisfied nor dissatisfied
Quite dissatisfied
Very dissatisfied

SECTION 8 – CROFTING & SMALL FARM SUPPORT SCHEME

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Yes/No/No opinion

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**Question 6**
*Is a 3 to 50 hectare range appropriate for defining a small land holding?*

Yes/No/No opinion

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Yes/No/No opinion

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Very satisfied
Quite satisfied
Neither satisfied nor dissatisfied
**Quite dissatisfied**
Very dissatisfied

**SECTION 9 – AGRI-ENVIRONMENT-CLIMATE SCHEME**

**Question 9**
*How would you rate your broad satisfaction with the proposal for the Agri-Environment-Climate Scheme?*

Very satisfied
Quite satisfied
Neither satisfied nor dissatisfied
**Quite dissatisfied**
Very dissatisfied
RSPB Scotland welcomes many of the plans and new elements of the proposed AEC scheme, however, a lack of detail regarding the elements of the scheme and an insufficient budget leave us unable to be satisfied with the proposals.

Because this section is short on detail, (especially compared to the Forestry section) it is difficult to judge the likely outcomes of the scheme and be satisfied. Our opinion therefore may change if details match the promises regarding option design, targeting, option prioritisation, and scoring and assessment of applications. We would like to be consulted on further details as soon as possible.

Furthermore, as already stated in answer to Question 1, we believe the budget for the AEC scheme is too small especially with the scope of the scheme being broadened in the new SRDP to meet the objectives for climate change, water quality and flooding. We believe that a minimum of £60m per year is needed to adequately meet the objectives and aims of this scheme.

We welcome the greater focus on targeting scheme options. We have called for this in the past and believe, if well designed, it will result in money being spent where it is needed. We would like to see high priority given to careful targeting of options focussed on biodiversity and especially priority bird species, such as corncrake and combunting. We also recommend that care is taken when overlaying priorities to reduce the risk of perverse outcomes, for example areas targeted for woodland planting on the same areas targeted for breeding wader habitats would cause a significant conflict.

SECTION 10 – FORESTRY GRANT SCHEME

Question 10
It is proposed to support forestry under six main areas as outlined in table 4 below. Please identify whether you agree with these broad areas.

- Woodland creation – **YES**
- Agroforestry – **YES**
- Tree health – **NO**
- Improvement of existing woodlands – **YES**
- Wood/timber processing and marketing – **YES**
- ‘Sustainable management of forests’ – **YES**

The RSPB has concerns that all these measures must be properly targeted to ensure biodiversity protection and enhancement, for example related to the location and design of new forestry and the management of existing woodlands.

We have a concern that the proposed option for a new woodland model for native broadleaved woodland of National Vegetation Classification W4 type should be targeted to creating UK Biodiversity Action Plan priority native woodland habitats, and must not be inappropriately located on restorable peatland habitats.
We also have concerns about potential impact of the new plant health options on the overall budget spend, as well as how forest plant health issues are addressed through the design and targeting of measure that ensure biodiversity is protected. We do not support this inclusion. See our answer to question 17 (below) for further justification.

We support the use of Section 11 grants for co-operation to facilitate the restoration of biodiversity of priority native woodland habitats and work for priority wildlife species.

**Question 11**

*We propose nine woodland creation options with support through standard costs. Should these be included? Yes/No/No opinion.*

- Conifer – **YES**
- Diverse Conifer – **YES**
- Broadleaves – **YES**
- Native Scots Pine – **YES**
- Native Broadleaved W4 – **NO**
- Native Broadleaved Other – **YES**
- Native low density – **YES**
- Small or Farm Wood – **YES**
- Northern and Western Isles – **YES**

**Conifer, Diverse Conifer, Broadleaves** - RSPB Scotland is concerned about threats to breeding wading bird habitats, priority habitats and priority flora from poorly located new woodland of all types, sizes and contexts. This includes new non-native forestry plantations of conifer, diverse conifer and non-native broadleaves. *It is important that the Woodland Creation Options 1, 2 & 3 (conifer, diverse conifer and non-native broadleaves) are carefully designed and located to ensure biodiversity protection.* This includes in grant requirement and approval processes, environmental impact assessment of site and cumulative impacts and UK Forestry Standard compliance. We are unclear what environmental benefits these woodland creation options offer.

**Native Scots Pine** - We support this native pinewood priority habitat woodland model, but note the importance of improving the ecological quality and condition of existing priority native woodland habitats.

**Native Broadleaved W4** - We are concerned that the proposed option for a new woodland model for native broadleaved woodland of National Vegetation Classification (NVC) W4 type (Option 5) ‘on upland shallow peaty soils’ may not be targeted to creating UK Biodiversity Action Plan priority native woodland habitats, and may also be inappropriately located on restorable important peatland habitats through first afforestation or as an alternative woodland type for restocking. RSPB Scotland is not supportive of measures and their approval mechanisms that result in inappropriately located or designed 'transitional woodland'?'peatland edge woodland' that causes direct and indirect biodiversity and hydrological loss and damage to priority open ground habitats and populations of important open ground species. **We do not, therefore, believe that this option should be supported in the SRDP.**
We are also concerned that the priority native woodland habitats (UK BAP priority habitat types in the Scottish Biodiversity Strategy) have been partially split into different models. It would be most appropriate for each priority native woodland UK BAP HAP type woodland to be placed in a discrete woodland model to allow best targeting and appropriate design of options.

Native Broadleaved Other - We are concerned that the priority native woodland habitats (UK BAP priority habitat types in the Scottish Forestry Strategy and Scottish Biodiversity Strategy) have been partially split into different models. It would be most appropriate for each priority native woodland UK BAP HAP type woodland to be placed in a discrete woodland model to allow best targeting and appropriate design of options. RSPB Scotland welcomes the introduction of a low density native woodland planting model as a mechanism for black grouse habitat creation, creation of treeline woods and montane scrub. It is important that this is targeted to give maximum benefit to priority wildlife habitats and priority species, and carefully located so as not to cause direct and indirect biodiversity loss or damage, for example to priority open ground habitats through tree planting or from providing a new neighbouring seed source for open ground habitats.

RSPB Scotland welcomes the continued support for native woodland creation targeted to the priority native woodland habitat types. We do note the importance of improving the ecological quality of existing native woodland remnants of priority habitats, and work for associated priority species; we welcome this through the proposed native woodland improvement grants. We would be concerned if the main focus of native woodland grant funding was on woodland creation, rather than woodland improvement.

We would welcome scheme design and approval mechanisms to encourage woodland owners and managers to undertake measures to protect and enhance the biodiversity of existing native woodland habitats on their land before seeking support for native woodland creation. This includes woodland on farms, ensuring the biodiversity condition of existing native woodland is considered as part of a whole farm plan and measures taken to improve its biodiversity value in preference to creating new woodland (which may be of lower biodiversity value and may even pose a threat to important non-woodland habitats and species if not required to be sensitively located through UK Forestry Standard compliance and environmental impact assessment).

Native Low Density - RSPB Scotland welcomes the introduction of a low density native woodland planting model as a mechanism for black grouse habitat creation, creation of treeline woods and montane scrub. It is important that this is targeted to give maximum benefit to priority wildlife habitats and priority species, and carefully located so as not to cause direct and indirect biodiversity loss or damage, for example to priority open ground habitats through tree planting or from providing a new neighbouring seed source for open ground habitats.

RSPB Scotland is concerned about threats to breeding wading bird habitats, priority habitats and priority flora from poorly located new woodland of all
types, sizes and contexts. This includes new farm woodland and conifer plantations, to the introduction of a new peatland planting woodland model.

We are concerned that small scale woodland planting on farms will have no requirement for UK Forestry Standard compliance unlike other woodland options. This poses a threat to important wildlife habitats and species as there may be little consideration of the environmental impacts at either site or cumulative levels of such planting, and no checks on the location, or design of the proposed woodland or ecological survey, as UK Forestry Standard compliance may not be a condition in grant rules and approval. RSPB Scotland welcomes the continued support for native woodland creation targeted to the priority native woodland habitat types. We do note the importance of improving the ecological quality of existing native woodland remnants of priority habitats, and work for associated priority species; we welcome this through the proposed native woodland improvement grants. We would be concerned if the main focus of native woodland grant funding was on woodland creation, rather than woodland improvement.

**Small or Farm Wood** - We would welcome scheme design and approval mechanisms to encourage woodland owners and managers to undertake measures to protect and enhance the biodiversity of existing native woodland habitats on their land before seeking support for native woodland creation. This includes woodland on farms, ensuring the biodiversity condition of existing native woodland is considered as part of a whole farm plan and measures taken to improve its biodiversity value in preference to creating new woodland (which may be of lower biodiversity value and may even pose a threat to important non-woodland habitats and species if not required to be sensitively located through UK Forestry Standard compliance and environmental impact assessment).

We would also be highly concerned if any approval process for agricultural grants favoured woodland creation purely on a points scoring basis, without any consideration of the location or design of the new planting, its biodiversity quality and the type, quality and condition of existing woodland and non-woodland habitats on the farm.

We note that the Scottish Government’s international commitments to sustainable forest management, including implementation via the UK Forestry Standard and its associated Forest Guidelines, does not exclude woodland creation or management on farms (or for woodland work consented via the town and country planning system, or for water management).

**Northern and Western Isles** - The continuation of support to woodland creation in the Northern Isles and the Western Isles under the proposed Woodland Option Model 9, must ensure that new woodlands are carefully located to avoid direct and indirect biodiversity loss or damage to priority non-woodland habitats and to populations of priority open ground species, such as breeding wading birds. UK Forestry Standard compliance must be a requirement under the grant scheme, and site and cumulative environmental impacts assessed.
Question 12
Are there any other woodland types that should be supported?

Yes/No

We have a concern that the priority native woodland habitats (UK BAP priority habitat types in the Scottish Biodiversity Strategy) have been partially split into different models. It would be most appropriate for each priority native woodland UK BAP HAP type woodland to be placed in a discrete woodland model to allow best targeting and appropriate design of options.

The proposals have a separate native pinewood priority habitat model, which we support; there is also an NVC W4 model (which could contribute to UKBAP Wet Woodland priority HAP) and then a ‘Native Broadleaved – Other’ model for the rest of the Wet Woodland priority HAP and the remaining native woodland priority HAPs – Upland Birchwood, Upland Mixed Ashwoods, Upland Oakwood and Lowland Mixed Deciduous woodland. We suggest that a woodland option and model for each UKBAP native woodland HAP type is needed, noting our reservations of separating NVC W4 woodland out of the Wet Woodland HAP type.

Question 13
Should the Central Scotland Green Network be allowed an Additional Cost Contribution?

Yes/No

We support this on condition that the new woodland is created to provide biodiversity benefits and located and designed not to cause biodiversity loss or damage to priority habitats or species.

We question the emphasis on woodland creation, as there will be native woodland in the Central Scotland Green Network, as well as afforested open ground habitats, that require support via woodland improvement grants to restore their biodiversity value.

Question 14
What is your preferred option for Income Foregone in SRDP 2014 - 2020?

Option 1
Option 2
Option 3

Please explain your choice

NO PREFERRED OPTION

A key issue for RSPB Scotland is minimum environmental standards related to woodland location and design, and the assessment of both site and cumulative environmental impacts, for example on breeding wading birds. This must apply to whichever Income Foregone Option is selected.
We note that there are existing native woodland on agricultural land that requires restoration and management to enhance its biodiversity condition. RSPB Scotland would be concerned if the emphasis of grant support for farm woodland is mainly focused on woodland creation, rather than support via woodland improvement grants to restore the biodiversity value of extant woods.

**Question 15**

*Do you agree with the range of other support for woodland creation?*

Yes/No/No opinion

- Tree shelters and fencing – No opinion
- Improved stock for Sitka spruce – No opinion
- Bracken Contribution – No opinion
- Support for Community Woodland – No opinion

It is unclear why this measure is offered, rather than included within the Standard Costs for each woodland creation option planting model. If this approach is considered, it should include support for biodiversity restoration and management on difficult sites that require higher standard costs, or additional operations, than covered by the woodland creation options funding models.

This support must be for assisting the production of public benefits, including the protection and enhancement of biodiversity.

**Question 16**

*Should agro-forestry be funded through the SRDP 2014 - 2020?*

Yes/No/No opinion

We recommend that this option is given a higher priority where it supports UK Biodiversity Action Plan priority habitats and meets the UK Forestry Standard to ensure careful location and targeting to protect the environment. This could include helping improve the ecological condition of priority native upland and lowland wood pasture and parkland habitats and species, for example parts of upland mixed ashwoods and upland oakwoods, upland juniper scrub, montane scrub and treeline woodlands.

This measure must not be used to support inappropriate levels of grazing and browsing that cause new or continued loss or damage to priority habitats and impacts to priority species. The needs of woodland grouse must be factored in to the design of grazing and deer control approaches and the use and design of fencing.
Question 17
Should Tree Health be funded through the SRDP 2014 - 2020?

Yes/No/No opinion

The selection of which forest pathogens, pests and diseases and what control approaches are supported needs to be focused to protecting public benefits, including biodiversity. This is not just an economic, or timber issue. For example work on *Phytophthora ramorum* needs to consider potential biodiversity threats to heather and blueberry, and associated wildlife, rather than just a larch timber concern.

We welcome the Scottish Government’s action to protect the wildlife of important upland mixed ashwoods, native pinewood and upland juniper from plant pathogens, from research to survey work, advice to woodland owners, manager and users, and control measures.

There must be a requirement to carry out control measures in a way that protects the environment, including avoiding disturbance to priority wildlife species, loss or damage to priority habitats. All work must be carried out in accordance with the UK Forestry Standard and this to be a condition of grants.

We question whether such work should be core funded by Scottish Government rather than drawing on limited SRDP funds.

Question 18
Do you agree with the range of Woodland Improvement Grants?

Yes/No/No opinion

- Long term forest planning – new - **YES**
- Long term forest planning - renewal - **YES**
- Reducing Deer Impact - **YES**
- Woodland Habitats and Species - **YES**
- Restructuring Regeneration - **YES**
- Non- Woodland Habitats and Species - **YES**
- Natural regeneration - **YES**
- Woodlands In and Around Towns - **YES**

RSPB Scotland supports the proposed options and targeting for priority woodland and non-woodland habitats and priority species under the UK Biodiversity Action Plan habitat types and species (these are embodied in the Scottish Biodiversity Strategy). We also welcome the requirement for a management plan and would welcome continued engagement on the design and guidance of such plans to ensure biodiversity targeting for effective operations to protect and enhance biodiversity.

We note that some of these options will need careful targeting and advisory support to produce effective positive biodiversity impacts. This is needed to ensure high quality biodiversity work in the right places and times, and at sufficient scale and uptake to provide large-scale benefits to priority habitats,
priority species as well as designated sites. This will require careful development of scheme rules, guidance, advice and approval mechanisms, as well as use of other measures such as co-operation.

RSPB Scotland looks forward to detailed discussion of options for black grouse, capercaillie and the priority native woodland habitats, as well as work for non-woodland habitats and species.

We note the importance of improving the ecological quality of existing native woodland remnants of priority habitats, and work for associated priority species; we welcome this through the proposed native woodland improvement grants. We would be concerned if the main focus of native woodland grant funding was on woodland creation, rather than woodland improvement.

We would welcome scheme design and approval mechanisms to encourage woodland owners and managers to undertake measures to protect and enhance the biodiversity of existing native woodland habitats on their land before seeking support for native woodland creation. This includes woodland on farms and around towns, ensuring the biodiversity condition of existing native woodland is considered as part of a whole farm plan and measures taken to improve its biodiversity value in preference to creating new woodland (which may be of lower biodiversity value and may even pose a threat to important non-woodland habitats and species if not required to be sensitively located through UK Forestry Standard compliance and environmental impact assessment).

**Question 19**

*Should these areas be supported through the SRDP?*

Yes/No/No opinion

- The development of the small scale premium softwood and hardwood processing sector; **YES**
- Equipment to increase harvesting in small undermanaged woods including small scale purpose built harvesters, machinery and equipment but not tractors; **YES**
- Equipment to increase capacity for steep ground harvesting. **YES**

RSPB Scotland welcomes this initiative as a mechanism to encourage the restoration and management of native woodlands to help protect and enhance wildlife. It is important that UK Forestry Standard compliance is required, backed up by advice on ecological survey, management planning, management, voluntary forest management certification of small and/or low intensity forest management within groups of owners, and supply chain development and with scope for collaborative action to facilitate this.

We note that the consultation in paragraphs 215 and 243 when discussing the ‘main RDR’ Articles suggests that Articles on investments in physical assets and co-operation will be available for forestry – we would welcome the use of collaborative measures, in combination with woodland improvement grants
and processing and marketing support, with the objective of assisting the improvement the biodiversity condition of native woodlands.

Question 20
Do you agree with the range of Sustainable Management of Forest grants?
Yes/No/No opinion.

- Native Woodlands - **YES**
- Low Impact Silvicultural Systems - **YES**
- Public Access - **YES**
- Public Access WIAT - **YES**
- Livestock Removal - **YES**
- Woodland Grazing - **YES**

RSPB Scotland welcomes the objectives of this to support the sustainable management of high environmental value woodlands. We welcome the inclusion of the 'native woodlands option' for maintaining and restoring the ecological condition of existing native woodlands and restoring the biodiversity of ancient woodland sites which are currently plantations.

RSPB Scotland also is pleased to see continued support for conversion to environmental low impact silvicultural systems as a way to seek alternative approaches to forest management that could produce more structurally and ecologically diverse woodlands. It is important that this is targeted to creating and restoring priority native habitats and recognises the value of open ground habitat restoration in key locations.

The livestock removal and woodland grazing options need to be carefully targeted to ensure biodiversity appropriate objectives, actions and operations towards achieving good ecological condition for priority habitats, priority species and designated sites.

Question 21
How would you rate your broad satisfaction with the proposal for the Forestry Scheme?

Very satisfied
Quite satisfied
Neither satisfied nor dissatisfied
Quite dissatisfied
Very dissatisfied

If you are dissatisfied please briefly outline your reasons (in the space given in the online questionnaire).

We have concerns, detailed in the answers above. We also need to see the detailed design of the options, including regulatory and advisory context, scheme rules and approval mechanisms.

RSPB Scotland looks forward to working with Forestry Commission Scotland, and other stakeholders, in the design of the options and their approval and implementation mechanisms. These outline proposals include some positive
aspects and provide reasonable basis for such discussions, noting our concerns detailed in this consultation response that need resolving.

SECTION 11 – SUPPORT FOR CO-OPERATIVE ACTION

Question 22
How would you rate your broad satisfaction with the proposals for co-operation?

Very satisfied
Quite satisfied
Neither satisfied nor dissatisfied
Quite dissatisfied
Very dissatisfied

We welcome the inclusion of support for cooperative action. We welcome this on the condition that the focus of this limited fund is on land-based projects and delivery of environmental outcomes, as opposed to projects aiming primarily for commercial benefit, such as collaborative marketing or food-based projects.

RSPB Scotland is concerned that the budget might not be sufficient to cover the demand, however, we recommend that this scheme is carefully targeted and prioritised to meet SRDP Objectives. We recommend that biodiversity hotspots are identified and targeted for this Cooperation fund in order to restrict it to meet the greatest need and achieve more significant benefit. This approach of targeted hotspots may be appropriate for achieving greater benefit and meeting objectives in the AEC and Forestry schemes.

In supporting the Forestry Grants Scheme we recommend carefully targeting cooperation to priority biodiversity, combined with other work funded by other Articles. For example, restoring the ecological condition of priority native woodland habitats, using collaborative action to assist with large-scale management planning and project working, ecological survey and restoration and management actions under woodland improvement grants (new Article 25), sustainable management of forests (new Article 34), setting-up of producer groups (new Article 27) and investments in mobilising/marketing forest products (new Article 26). Co-operative action could also be helpful in restoring and managing native pinewoods for capercaillie and habitat restoration and creation for black grouse at suitable scales and areas from an ecological perspective.

We also recommend that the definition of an animator is more clearly defined and criteria set to ensure that applicants have the skills, experience and contacts to fulfil the role and deliver environmental benefits. For example, we are strongly concerned that this scheme is NOT used by applicants and groups primarily for commercial benefit.

SECTION 12 – NON-AGRICULTURAL BUSINESS SUPPORT: SMALL RURAL BUSINESS SUPPORT
Question 23

*How would you rate your broad satisfaction with the proposals for Small Business Support?*

- Very satisfied
- Quite satisfied
- **Neither satisfied nor dissatisfied**
- Quite dissatisfied
- Very dissatisfied

We favour support to businesses which help to support and build on Scotland’s ‘green assets’ e.g. opportunities to support eco-tourism. We recommend that applications should be assessed to prioritise those which promote sustainable rural development. No funding should be given to business proposals that might be environmentally damaging.

**SECTION 13 – NON-AGRICULTURAL BUSINESS SUPPORT: FOOD & DRINK**

Question 24

*Do you agree with the proposal that we should continue to give significant support to the food and drink sector?*

**Yes/No/No opinion**

RSPB Scotland recognises the role for EAFRD in supporting the food and drink sector. We believe that the role of the SRDP in this should be to support small-scale enterprises and funding should be focused on developing new, small-scale, artisanal food and drink businesses with a strong environmental brand (quality products from a quality environment type idea) or those which link to healthier eating.

We recommend a reduction in the proposed budget, for example to £50m, to free up funds for already underfunded SRDP schemes, especially the Agri-Environment-Climate scheme. Other European Structural and Investment Funds could then play a bigger role in supporting the wider food and drink sector and the more export orientated businesses, channelled through SE, HIE and Scotland Food and Drink. In other words, the EAFRD money should support genuine bottom-up rural development.

Question 25

*Selection criteria such as those listed above should apply to that support?*

**Yes/No/No opinion.**

- Contribution to the Scottish Government’s overall strategies for economic development and the rural economy. – **Yes**
- Making a contribution to national policies for food and drink. – **Yes**
- Assisting the Scottish Government with its wider social policies – such as supporting or encouraging healthier eating through the provision of greater and healthier food-choices for consumers. – **Yes**
- Supporting export targets for food and drink sectors. This could include providing increased funding to projects with a strong export focus/developing new markets. - No

Where we support the selection criteria, on condition that these are aligned to our answer to Question 24 and the following. RSPB Scotland recommends that the selection criteria includes support for food and drink sectors and businesses which produce or promote environmentally friendly food and drink products or processing. We also recommend selection criteria be included which encourage businesses to lower their carbon footprints.

**Question 26**
*Steps should be taken to streamline processes for food companies including a one stop shop for public support?*

*Yes/No/No opinion*

Yes – BUT, as above, small business must be the beneficiaries.

**Question 27**
*How would you rate your broad satisfaction with the proposals for Food and Drink support?*

Very satisfied
Quite satisfied
**Neither satisfied nor dissatisfied**
Quite dissatisfied
Very dissatisfied

**SECTION 14 – LEADER**

**Question 28**
*How would you rate your broad satisfaction with the proposals for LEADER?*

Very satisfied
**Quite satisfied**
Neither satisfied nor dissatisfied
Quite dissatisfied
Very dissatisfied

RSPB Scotland welcomes efforts to tackle LEADER process issues.

We support the proposal that LEADER contributes to community action on climate change and we would like to see this include increasing community resilience and adaptability to climate impacts. We also warmly welcome LEADER enhancing natural/cultural heritage and recommend that this scheme makes links with spending and projects in other schemes, especially the Agri-Environment-Climate scheme.

We do not agree that there 'needs to be a focus, above all, on sustainable economic growth' and do not agree with it as a concept. We recognise sustainable development as a key national aim. Much of our work, previously
funded by LEADER has delivered more strongly against social needs such as improving physical and mental health through providing opportunities to be active outdoors for all members of the community. We deliver outdoor learning and habitat conservation which is vital for the future of our environment and wildlife but doesn’t necessarily directly impact on economic growth. We, and many other applicants, would have difficulty providing evidence in our applications that we could contribute to ‘sustainable economic growth’.

SECTION 15 – KNOWLEDGE TRANSFER & INNOVATION FUND (KTIF)

Question 29
*Do you agree with the range of options being included within KTIF scheme?*

**Yes/No/No opinion.**

- Skills development - **YES**
- Vocational training - **YES**
- Monitor farms - **YES**
- Setting up an EIP network – **No opinion**

Question 30
*How would you rate your broad satisfaction with the proposals for KTIF?*

Very satisfied

**Quite satisfied**

Neither satisfied nor dissatisfied

Quite dissatisfied

Very dissatisfied

We believe that there is great scope to use the KTIF fund to transfer knowledge and innovate around environmental issues and helping farmers to improve environmental performance. KTIF needs to work to help farming become more progressive – more market orientated and more environmentally responsible.

RSPB Scotland recommends that the KTIF be used to increase awareness, knowledge and training in environmental protection and enhancement in line with SRDP objectives. For example, this could be a key mechanism to develop and disseminate best practice around adaption to climate change. We recommend that monitor farms must do more to include environmental protection and enhancement in their monitoring and Knowledge Transfer.

We believe the ‘statement of need’ in paragraph 314 as inadequate as it does not describe the type of knowledge that the analysis identified as being needed. Rather it identified the type of tools needed.
SECTION 16 - ADVISORY SERVICE

Question 31
How would you rate your broad satisfaction with the proposals for the Advisory Service?

Very satisfied
Quite satisfied
Neither satisfied nor dissatisfied
**Quite dissatisfied**
Very dissatisfied

We see advice as a key element of maximising value for money from the Agri-environment-climate scheme, and the Forestry Grants Scheme. RSPB recommends that the advisory service includes as a priority support for creating, restoring and maintaining priority habitats and species, and for applicants aiming to protect and enhance wider biodiversity.

RSPB Scotland welcomes the proposed structure for the advisory service – especially the inclusion of 1 to 1 advice to help farmers and crofters maximise the benefits from biodiversity-focussed options.

Unfortunately, we are dissatisfied because we do not believe that £20m will be sufficient to cover existing advisory commitments and the new advisory elements in the proposals. **We recommend that £40-50m is needed over the life of the SRDP to more adequately provide a quality advisory service.**

SECTION 17 – SCOTTISH RURAL NETWORK

Question 32
Do you think the tasks set out above are the most appropriate ways for the SRN [Scottish Rural Network] to add value to the implementation of the SRDP?

- SRN website – **Yes**
- Gathering of good programme examples – **Yes**
- Disseminating information to the public – **Yes**
- Organisation of events – **Yes**

Are there other activities or services you would like to see the SRN provide?

We welcome the proposed development of the SRN especially to improve the implementation of the SRDP and specifically the Agri-Environment-Climate scheme.

Question 33
Do you agree with the proposal to establish thematic working groups as an approach to supporting the Rural Development Programme priorities?

**Yes/No/No opinion**
We welcome the thematic working group approach and recommend that it includes an Environment Theme as a place to discuss the Agri-Environment-Climate scheme.

**Question 34**
*How would you rate your broad satisfaction with the proposals for the Scottish National Rural Network?*

Very satisfied  
**Quite satisfied**  
Neither satisfied nor dissatisfied  
Quite dissatisfied  
Very dissatisfied

**SECTION 18 - COMMUNICATIONS**

**Question 35**
*How would you rate your broad satisfaction with the proposals for communicating the new Scotland Rural Development Programme?*

Very satisfied  
**Quite satisfied**  
Neither satisfied nor dissatisfied  
Quite dissatisfied  
Very dissatisfied

**SECTION 19 – MONITORING & EVALUATION**

**Question 36**
*We would welcome feedback on the approach outlined in Table 9*

RSPB Scotland is concerned that the Scottish Government must not simply aim to meet the indicators set by the EC. Instead, we recommend, monitoring and evaluation be put in place which also aims to show if the £1.3bn being spent is good value for money and having the intended impact. Furthermore an M&E scheme should be designed to inform the development of future schemes. As we explained in our SRDP Principles document\(^{13}\) *‘Many of the examples where agri-environment management is delivering national recovery of bird populations reveal a history of adaptive improvement of management options and their combinations and targeting, based on evidence accrued from monitoring studies’. We do not believe that meeting the minimum set of indicators set by the EC will help do this.*

We find Table 9 to be vague and therefore difficult to draw strong conclusions. However, we welcome amending existing surveys (row 2) to make them better suited to help with SRDP evaluation. A huge amount depends upon which data sources or commissioned work are intended to be captured by row 3.

Question 37
Are there any other data sources which could inform the impact of the programme?

Yes/No

Question 38
We would welcome feedback on the proposed approach to filling the gaps in the data required by the European Commission, outlined in Table 10

No comment

Question 39
Are there any other gaps that you wish to make us aware of?

Yes/No

RSPB Scotland notes no mention of biodiversity indicators in Table 10. We believe that biodiversity indicators are an important indicator to measure SRDP impact but the existing biodiversity indicators are not sufficient to do this. We therefore recommend that this gap is addressed in the next SRDP.

Question 40
Are there any other data sources which could help us fill the data gaps?

Yes/No

A more detailed discussion of appropriate data needs to adequately evaluate biodiversity impact of the SRDP is needed with environmental NGOs including a discussion of available datasets.

SECTION 20 – IMPACT ASSESSMENTS

Question 41
We would welcome comments on the BRIA [Business & Regulatory Impact Assessment]

No comments

Question 42
We would welcome comments on the EQIA [Equalities Impact Assessment]

No comments
How to create a consensus: the democratic process and support for crofting

In December 2013 the Scottish Government announced its proposals for reform of the Scottish Rural Development Programme [SRDP]. This is stage 2 of the reform process and develops on the public responses that came forward during the stage 1 consultation earlier in 2013.

Among the measures being put forward in the stage 2 proposals is to scrap the Crofting Counties Agricultural Grant Scheme [CCAGS – also known as ‘the crofting scheme’] and replace it with a Crofting and Small Farms Scheme that will be open to all farms and smallholdings in Scotland of under 50 hectares. The result of this proposal would be a new scheme which would be open to 73% of all holdings in Scotland. (Scottish Government 2013: Paras. 170, 172)

The following short report does not take a position in favour or against the proposed new scheme. It acknowledges, also, that during extensive legislative processes such as SRDP reform it is necessary for the Scottish Government to ‘shape’ the tremendous body of information gathered through consultation in order to achieve a set of legislative proposals. This is a routine part of the democratic process.

It is the purpose of this report to investigate whether the ‘shape’ of the new proposed Crofting and Small Farms Scheme accurately reflects the responses which the Government received on support for crofting, and whether the statement by which the Government has proposed to scrap the CCAGS scheme is well grounded in fact. Here is the statement – which for clarity will hereafter be called statement 169 – in full:

With respect to eligibility considerations, consultees were asked whether support for crofting currently provided under the CCAGS should extend to small land holders of like status. 60% of those responding to the question agreed and there was a strong consensus that support should extend to the whole of Scotland on the basis that small scale low-intensity farms play an important role in supporting rural employment and maintaining the social fabric of rural areas. (Scottish Government 2013: Para. 169)

Statement 169 asserts as fact that 60% of consultees responded positively to the idea that CCAGS be extended to non-crofters. However, it does not disclose that respondents were, in fact, giving their views to a question in the stage 1 consultation which asked:

Do you agree or disagree on whether support for crofting should extend to small land holders of like economic status who are situated within crofting counties? (Griesback et al. 2013: sect. 6.35 – my emphasis)
In the stage 1 process there was no question of CCAGS being extended throughout Scotland. However, it is impossible to discern this fact from the particular choice of words subsequently used in statement 169. Indeed, arguably the wording of this sentence in statement 169 strongly implies that this wider question was what was actually asked.

Statement 169’s next sentence takes the argument for extension further. In it the Government claims that in the consultation on the Crofting Support Scheme [CSS] “there was a strong consensus that support should extend to the whole of Scotland”.

‘Consensus’ is defined as a ‘general or widespread agreement among all the members of a group’. Where, then, is the Government’s evidence of ‘strong consensus’ for the extension of support beyond the crofting counties? It is likely to be derived from the following statement in the analysis of responses to the stage 1 consultation of SRDP reform:

A strong theme in the responses to Question 12 was that small landowners of like economic status should be eligible for funding under the CSS, irrespective of whether they were situated in crofting counties. As stated above, if small-scale, low-intensity farms can deliver the Government’s priority outcomes, there is no reason to limit ring-fenced support to crofting counties only. (Griesback et al. 2013: sect. 6.53 – emphasis in original, interestingly)

In considering this statement, it is important to keep in mind that the Government appears to have used it to propose opening up the crofting scheme to the whole of Scotland on the basis of what it calls a ‘strong consensus’ in support of the idea. Critical, therefore, to the stage 2 proposal’s validity is the existence at stage 1 of consensus – a ‘general or widespread agreement among’ consultees that this opening up should happen.

However, only 60 per cent of stage 1 respondents agreed with the proposal to include non-crofters within the crofting counties in a new crofting scheme. The other 40 per cent (including all the crofting representative organisations) did not state their agreement to this proposal. The stage 1 analysis states that 60 per cent agreed with the proposal to extend the scheme within the crofting counties while 27 per cent disagreed. The position of the other 13 per cent was not fully explained in the analysis.

If 27 per cent of respondents do not believe that non-crofters from inside the crofting counties should qualify for support then it follows logically from this fact that this 27 per cent also do not believe that non-crofters from outside the crofting counties should qualify for support.

Therefore, the analysis shows that at least 27 per cent of respondents are not part of the ‘strong consensus’ that the Government claims to have found in favour of extending CCAGS beyond the crofting counties, and also leaves open the possibility that up to 40 per cent of respondents may not agree with the proposal.
Further, in order to demonstrate that even 50 per cent of all stage 1 respondents supported the extension of the crofting scheme beyond the crofting counties, the stage 1 analysis would have had to provide evidence that around 85 per cent of all responses supporting the extension to non-crofters within the crofting counties also supported extension beyond the crofting counties. This evidence was not presented.

Even if this had been presented, it is still invalid to present it as evidence of ‘a strong consensus’ in favour of extension of the scheme throughout Scotland – as statement 169 asserts – because, as already indicated, at least 27 per cent and perhaps as many as 40 per cent of respondents may already be committed in principle to opposing extension of the scheme.

Therefore, it seems that the analysis presented in statement 169 as justification for a proposal to open up the crofting scheme to applicants in non-crofting areas is not only seriously misleading, it is also disrespectful of the democratic process – at least 40 per cent of respondents appear to have been made part of a ‘strong consensus’ for which there is, in reality, no evidence presented to show that they agreed to, and which therefore does not, in fact, exist.

There are several other means of verifying the claim that a strong consensus exists for opening up the crofting scheme beyond the Crofting Counties. One means would be to examine the results of a working group set up in 2013 by the Scottish Parliament’s Cross-Party Group on Crofting [CPGoC]. This was made up of representatives of organisations that have an interest in crofting development. It produced a report recommending to the Scottish Government that a crofting and small unit support scheme be set up. In the CPGoC report the National Farmers Union of Scotland [NFUS] suggested that CCAGS support should be open to all smallholdings in the crofting counties but this suggestion was not supported by the working group as a whole. (CPGoC working group 2013: 15)

Given the fact that a crofting support scheme is by definition one which is restricted to those counties in which crofting tenure exists, support for CCAGS to be limited to the crofting counties only is actually affirmed in the findings of the Government’s own stage 1 consultation. This found that 73 per cent of all respondents wanted to see a specific crofting support scheme. (Griesback et al. 2013: sect. 6.36) The analysis of the stage 1 responses then adds that all of the crofting and farming organisations who responded to the question supported a crofting specific scheme. In doing so, all of them (including, presumably, the NFUS) have, as a result, appear to have committed to Government that they wish for support to be restricted to the crofting counties

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14 The terminology that refers to the comprehensive crofting programme proposal is highly confusing. The Government’s stage 1 consultation asked whether a Crofting Support Scheme [CSS] should be set up. (Griesback et al. 2013: sect. 6.36). Following this, the CPGoC’s report on SRDP had proposed that CCAGS be expanded and renamed the Crofting Support Programme [CSP]. This CSP was to be separate from the agri-environment programme proposed by the CPGoC which it called the Rural Land Management Programme for Crofting and Small Units. (CPGoC 2013: 12) By its stage 2 proposals the Government was referring to the agri-environment sub-programme (which was to be part of what it had called CSS in stage 1) as the Crofting Support Programme [CSP]. (Scottish Government 2013: para 167)
as, of course, this is the only way in which a specifically crofting support
scheme can be deployed.

This emphatic figure of 73 per cent of respondents indicates the level of
support respondents were giving to a much wider crofting specific support
system "that will fund all grants relevant to crofting" covering both CCAGS for
capital development and a crofting agri-environment sub-programme to
support agricultural activity. Only eight per cent of respondents disagreed with
this proposal.

Despite the very high level of support this proposal for a comprehensive
crofting specific programme attracted in the consultation, the Scottish
Government dismissed it because the Government regards it as too complex,
too costly to administer and because "a number of respondents... did not
believe that a single scheme could fund all the requirements crofters might
have, and did not think the Government should seek to create a scheme that
would do this". (Scottish Government 2013: para. 175) It does not state who
these respondents are and why their views are so important. Neither does it
explain why a comprehensive crofting scheme was included as a possibility in
the stage 1 consultation in the first place, given the Government’s opposition
to it in principle.

As previously noted, there was consensus among members of the CPGoC in
support of a crofting specific agri-environment sub-programme and an
enhanced CCAGS. The percentage of stage 1 respondents in favour of this
comprehensive crofting specific programme is far higher than the percentage
who were in favour of opening up CCAGS within the crofting counties – a
response which the Government is now using in support of a proposal to open
CCAGS up beyond the crofting counties.

Therefore, it may be in the interests of democracy for the Government to
reconsider its refusal to countenance a comprehensive crofting programme as
it appears that the Government’s proposal to scrap the crofting specific
CCAGS and replace it with a new scheme that extends to non-crofters
beyond the crofting counties is, in fact, directly in opposition to the principle
put forward by 73 per cent of respondents to the stage 1 consultation.

How is it, then, that the Government can have come to propose the opposite
view? Why does statement 169 conceal the fact that the 60% of consultees
who responded positively to the idea that CCAGS be extended to non-crofters
were not answering a Scotland-wide question but were, in fact, responding to
a question in the stage 1 consultation which was specific to the crofting
counties? Why is it that the stage 1 responses have been used to claim a
‘strong consensus’ for extending the scheme which appears, in fact, to be
quite fictional?

In a small way (but for the crofting community a very important way) the fact
that these questions exist represents a predicament if not a crisis for Scottish
democracy. On the face of it, it would appear that the democratic process is
being manipulated to achieve policy outcomes that do not reflect the
responses that the Government received during SRDP consultation and which do not, then, represent the will of the Scottish people.

There are clearly questions to be answered by the Scottish Government about the ‘shape’ of their proposal to scrap the CCAGS scheme. This proposal does not appear to fit the responses that were given during the consultation on the scheme’s future which suggest that a comprehensive and specifically crofting support scheme is what is wanted.

There is no evidence to suggest that the stage 2 proposals regarding the scrapping of CCAGS have, in fact, been formed with an intention to deceive. However, those who have contributed to the SRDP consultation and had their responses misinterpreted by the Government’s policy analysts to put forward legislative proposals they do not, in fact, agree with, have a right to know how and why such errors of representation have occurred.

REFERENCES


**Written response from Scotland's Rural College (SRUC)**

[This is the SRUC’s response to the Scottish Government’s consultation on the Scotland Rural Development Programme (SRDP) 2014 – 2020, Stage 2: Final Proposals]

**SECTION 4: BUDGET FOR SRDP 2014-2020**

**Question 1**

*How would you rate your satisfaction with the budget as a whole?*

**Quite satisfied**

*If you are dissatisfied, please briefly outline your reasons*

SRUC is quite satisfied with the budget on the basis that:-
Decisions have been made and agreed to take 9.5% from Pillar I to achieve this level of spend, and therefore adjustments to the budget are now difficult to envisage.

The total budget for SRDP 2014-2020 at £1.329bn is less than compared with the headline of £1.6bn for SRDP 2007-2013, a net reduction of £0.27bn or nearly 17%. However, this budget reduction is intended to provide a realistic balance between Pillars I and II.

The management of the budget on an annual basis (paragraph 88) permits the movement of funds from one year to the next, particularly where funds are underspent in a particular year and perhaps in a particular area. If, however, paragraph 88 means that a fixed annual spend is to be allocated in each year, then the lack of flexibility in such an arrangement would be of concern.

Prudent management of the budget allocation from year to year will be required. It will also be appropriate that communication of the main areas of available funding at each stage of the SRDP is provided to all claimants/applicants.

Paragraph 91 means that if schemes/priorities do not spend up to the expected levels then Scottish Government will use the opportunity to change the profile of the budget during the life of the Programme, thereby returning the funds to the programme for others to apply for. This will achieve optimal spend of the total budget.

SECTION 5: RURAL REGIONAL DELIVERY PARTNERSHIP FOR LAND BASED INVESTMENTS

Question 2
Are you broadly satisfied with the new application and assessment process for land based investments outlined in Section 5?

Very satisfied

If you are dissatisfied, please briefly outline your reasons.

SRUC is very satisfied with the new application and assessment process for land based investments outlined in Section 5.

A common application form for all land based investment schemes is welcomed with competitive applications enabling better value for money projects to be selected with ability to focus on regional priorities remaining. Level 1 applications – the £75,000 (and £750,000 for forestry) limits are probably about right and the lack of application tranches is welcomed and less likely to lead to delays of worthwhile projects. For Level 2 it is encouraging that the expert panel will meet as required as this may avoid long delays between applications and approvals, and hence project lead in times (it is worth noting that specific application tranches can also lead to time pressures for consultants as businesses scramble to get applications in before deadlines).
The assessment network is wholly appropriate, but it should be made clear that assessment visits (paragraph 116) are not designed to aid them develop their application. The application limits appear wholly reasonable, but the issue of a timing surrounding a resubmitted application may need clarification. We are encouraged that the funding pipeline (paragraph 118) has been acknowledged, but this may prove aspirational in reality. Improved customer support by delivery partners would be most welcomed. The targeting of funds appears appropriate but the Crofting and Small Grants Scheme (paragraph 126), if using Ha, may need an exclusion clause for intensive systems (i.e. poultry, pigs, horticulture).

SECTION 6: FUTURE SUPPORT FOR LESS FAVOURED AREAS

Question 3
Should support for farmers operating in constrained areas be continued through the SRDP?

Yes

Support for constrained areas should continue to be funded through the SRDP. This will be important as adjustments to direct support payments are made during the programming period. This is particularly the case for farming systems (e.g. beef) where the consequences of regionalised payments may have significant impacts on the direct support they receive. Perhaps with the introduction of ANCs in 2018 there will be an opportunity to take stock of the overall direct payment and LFASS/ANC support picture in Pillars 1 and 2. For instance, if the regional payment model chosen in Pillar I allows for some delineation of different qualities of grazing and there is a robust activity measure, this may enable Pillar 1 regional rates to be adjusted to account for LFASS/ANC support. This would enable this element of support to be directed through Pillar 1 direct payments freeing up some of the Pillar 2 budget for other rural development priorities.

SECTION 7: NEW ENTRANTS SCHEME

Question 4
How would you rate your satisfaction with the proposals for the New Entrants Scheme?

Very satisfied

If you are dissatisfied, please briefly outline your reasons

SRUC is very satisfied with the proposals for the New Entrants Scheme.

The proposed New Entrant measures, in combination with potential assistance through the Crofting and Small Farms Support Scheme, the Knowledge Transfer and Innovation Fund, the Advisory System and the Pillar 1 new entrants top up, represent a comprehensive support package for new entrants.
Previous experience of young entrant schemes has encouraged intergenerational renewal, which in the crofting schemes can only be viewed as positive.

SECTION 8: CROFTING AND SMALL FARM SUPPORT SCHEME

Question 5
Should the scheme be expanded to provide capital support to small farms?

Yes

Question 6
Is a 3 to 50 hectare range appropriate for defining a small land holding?

No

Question 7
Do you agree with the proposal for grants of £500 to be available to assist the establishment of Grazings Committees?

Yes

If No, please explain why

Q7: SRUC agrees with the proposal for grants of £500 to be available, although the scale of the fee is low for a professional service.

Q5: SRUC agrees that the scheme should be expanded to provide capital grants to small farms. However, the budget allocations could create difficulties. Previously, only 13,000 crofters had access to this funding stream. The situation going forward will see 37,000 businesses being eligible for support under this measure, with only a modest movement in the total budgetary allocation.

Q6: SRUC does not agree that a 3-50 ha range is appropriate for defining a small land holding as this is too blunt a measure. A better definition of eligibility is needed, which should factor in remoteness and access to markets.

Question 8
How would you rate your broad satisfaction with the proposals for the Crofters and Smallholders Scheme?

Quite dissatisfied

If you are dissatisfied, please briefly outline your reasons.

SRUC is quite dissatisfied with the proposals for the Crofters and Smallholders Grant Scheme.

The Scheme uses a simple land area demarcation, which is too blunt a measure to determine eligibility. 50 ha in the Highlands has nowhere near the economic output of the lowlands, yet both will have access to the same
funding stream. Some measure of economic activity needs to be incorporated into the eligibility parameters.

Without such a measure, economically active units in the Highlands, which will tend to exceed the 50 Ha rule will be excluded whilst less active units elsewhere will have access.

The actual intervention grant rates and the various scales of supplement are also at levels which are workable. The only concern is that the budgeted allocation per business is quite low and the higher costs in the remoter areas will dilute the impact of intervention.

**SECTION 9: AGRI-ENVIRONMENT-CLIMATE SCHEME**

**Question 9**

*How would you rate your broad satisfaction with the proposal for the Agri-Environment-Climate Scheme?*

Quite dissatisfied

*If you are dissatisfied, please briefly outline your reasons.*

SRUC is quite dissatisfied with the proposal for the Agri-Environment-Climate Scheme.

We appreciate the difficulties in timings which have bedevilled the CAP reform process at a European level. Nevertheless there are still too many unknowns at this point in time with regard to implementation at the Scottish level. Hence it not feasible to make any robust assessment as to whether or not the proposed Agri-Environment-Climate Scheme will actually result in any real environmental benefits.

The way both Pillar 1 and Pillar 2 are implemented will have a major influence on how successful the proposed Agri-Environment-Climate Scheme will be. Clearly the decision made in December 2013 to transfer only 9.5% of funding from Pillar 1 to Pillar 2 has placed limitations on the amount of budget available for the Agri-Environment-Climate Scheme. Just as importantly, the fact that no decision has yet been taken with regard to how Greening will be implemented in Pillar 1 means that it is not possible to assess how much the approach taken to Greening will actually complement the actions taken under the proposed Agri-Environment-Climate Scheme.

The consultation document recognises that the ‘continuing loss of biodiversity on farmed land’ is a major issue in Scotland (as elsewhere in Europe). It is therefore surprising that no mention is made in paragraph 189 with regard to how the proposed Agri-Environment-Climate Scheme will help the Scottish Government meet its targets for biodiversity as set out in the revised Scottish Biodiversity Strategy. As that Strategy highlights, appropriate implementation of both Pillar 1 and Pillar 2 measures will be required if the reformed CAP is to help address farmland biodiversity concerns.
The consultation document highlights that there is a need to ensure that measures under the proposed Agri-Environment-Climate Scheme are targeted better in order to increase the likelihood of having environmental benefits. This is very welcome and we are very pleased to be a member of the Biodiversity Targeting Working Group which is investigating how best to target the different measures. However, the fact that the approaches taken to help with targeting are still in development means that it is difficult to make any assessment at this stage as to how effective those approaches are likely to be in practice.

Being a member of the Biodiversity Targeting Working Group, we are also aware of the large amount of work being conducted by the other Working Groups assessing which measures to include in the Agri-Environment-Climate Scheme. The majority of the measures included do have the potential to have environmental benefits if applied at the right scale in the right places. In particular, measures such as those in the arable and grassland sections of the Scheme are very focused and thereby specific in what they are seeking to achieve.

However, as we have highlighted separately in discussions in the Working Group, we are concerned that the measures for Upland & Moorland Management currently remain very broad, particularly with regard to what the anticipated biodiversity/environmental benefits will be. If this remains like this, it will not only mean that it may be more difficult to decide where best to implement such measures, but it also means that assessing whether or not those measures have actually had any benefits will be difficult. The Scottish Government will clearly be keen to assess in the future the cost-effectiveness of all the measures within the new Agri-Environment-Climate Scheme. We suggest that if the biodiversity/environmental goals of the Upland & Moorland Management measures are not made more explicit, then any future assessment of cost-effectiveness of those measures will be difficult to achieve.

We understand that Scottish Government is giving additional thought as to how best to target upland measures to particular habitats/species. We welcome this and encourage them to continue to investigate this.

From a farmer perspective, an Agri-Environment-Climate Scheme webpage listing options for potential applicants according to location would be very helpful but, as indicated above, may be difficult to develop. In addition, the options listed in Annex C are very limited and for many farming businesses, do not create viable opportunities to participate.

Given the importance attached to conservation and sustainable use of genetic resources for agriculture in the overarching EU legislation, it would be helpful to see more emphasis on that here. In particular, it would help to explicitly make it clear that NGOs/SMEs are eligible for RDP support for measures to support conservation and sustainable use of farm animal genetic resources (FAnGR). It would also be worth evaluating the use of RDP or other measures to incentivise FAnGR use that supports policy aims (including reducing GHG
emissions, enhancing sustainable economic growth…) as is being trialled in the Republic of Ireland, in support of their Food Harvest 2020 initiative.

SECTION 10: FORESTRY GRANT SCHEME

Question 10
It is proposed to support forestry under six main areas as outlined below. Please identify whether you agree with these broad areas.

Woodland Creation:
Yes, should be included

Agroforestry:
Yes, should be included

Tree Health:
Yes, should be included

Woodland Improvement Grant:
Yes, should be included

Process and marketing:
Yes, should be included

Sustainable Management of Forests:
Yes, should be included

Question 11
We propose nine woodland creation options with support through standard costs. Please identify whether you think these options should be included (Yes) or excluded (No)

Conifer:
Yes, should be included

Diverse Conifer:
Yes, should be included

Broadleaves:
Yes, should be included

Native Scots Pine:
Yes, should be included

Native Broadleaved W4:
Yes, should be included

Native Broadleaved Other:
Yes, should be included

Native low density:
Yes, should be included

Small or Farm Wood:
Yes, should be included

Northern and Western Isles:
Yes, should be included

Question 12
Are there any other woodland types that should be supported? If Yes, please specify

No
There should be scope in crofting areas for small-scale woodland creation.

Question 13
Should the Central Scotland Green Network be allowed an ‘Additional Cost Contribution’? If No, please briefly explain your reasons

Yes

Question 14
What is your preferred option for Income Foregone (IF) in SRDP 2014 - 2020? Please click on 'More information' below to view the 3 options

Option 2

Please explain your choice

Option 1 is administratively most difficult. Option 2 probably is the best option as it allows maintenance payments which are non taxable plus Pillar 1 payments.

Question 15
It is proposed to support woodland creation through other means. Do you agree with the range of ‘other support’ for woodland creation?

Tree shelters and fencing:
Yes, include
Improved stock for Sitka Spruce:
Yes, include
Bracken contribution:
Yes, include
Community woodland:
Yes, include

Question 16
Should agroforestry be funded through the SRDP 2014-2020?

Yes

Question 17
Should tree health be funded through SRDP 2014-2020?

Yes

Question 18
Do you agree with the range of Woodland Improvement Grants?

Long term forest planning - new:
Yes
Long term forest planning - renewal:
Yes
Reducing Deer Impact:
Yes
Woodland Habitats and Species: Yes
Restructuring Regeneration: Yes
Non-Woodland Habitats and Species: Yes
Natural regeneration: Yes
Woodlands In and Around Towns: Yes

Question 19
We propose to offer support to forest owners, micro-enterprises and SMEs for investments which enhance forestry potential or relate to processing and marketing, or adding value to forest products. Should these areas be supported through the SRDP?

Small scale premium processing sector: Yes, should be included
Equipment to increase harvesting in under-managed woods: Yes, should be included
Equipment to increase capacity for steep ground harvesting: Yes, should be included

Question 20
We propose six Sustainable Management of Forest Options. Do you agree with the range of Sustainable Management of Forest grants?

Native Woodlands: Yes, should be included
Low Impact Silvicultural Systems (LISS): Yes, should be included
Public Access: Yes, should be included
Public Access WIAT ((woods within 1 km of settlements with a population of over 2000 people): Yes, should be included
Livestock Removal: Yes, should be included
Woodland Grazing: Yes, should be included

Question 21
How would you rate your broad satisfaction with the proposals for the Forestry Scheme

Neither satisfied nor dissatisfied

If you are dissatisfied, please briefly outline your reasons.

Q21: SRUC is neither satisfied nor dissatisfied with the proposals for the Forestry Scheme.
Q10: SRUC supports the six main areas. However, the rationale in paragraph 218 where the FC should deliver 500ha of new planting does not offer best value for money and puts it in direct competition with the private sector for land suitable to be planted. This has been demonstrated locally by the FC paying seemingly very high prices for land against which others have found it difficult to compete.

Q15: SRUC agrees with the range of 'other support', especially the tree shelter and fencing which are the biggest cost in any scheme and the bracken contribution as this will bring more land into the mix especially in the west where bracken cover has been increasing over the last few years. Public planting for public access in the remoter parts could be further encouraged if the criteria within the Highlands was reduced to populations over 200.

Q17: SRUC agrees with funding tree health through SRDP 2014-20, but should it be coming out of the same pot of money? This takes away money from the important work of woodland creation which is the government target and surely this type of work would be covered by their woodland insurance.

Q19: SRUC agrees that these areas should be included as they offer opportunities for farm diversification.

SECTION 11: SUPPORT FOR CO-OPERATIVE ACTION

Question 22
How would you rate your broad satisfaction with the proposals for co-operation?

Neither satisfied nor dissatisfied

If you are dissatisfied, please briefly outline your reasons.

SRUC is neither satisfied nor dissatisfied with the proposals for co-operation.

The concept seems logical however the absence of details of what specific areas and themes are to be targeted (paragraph 258), makes it difficult to properly assess the proposal. Careful management will be required to ensure funds are not over-allocated to projects which may be backed by Government and some delivery partners but which are unlikely to be sufficiently supported by the land managers in question.

SECTION 12: NON-AGRICULTURAL BUSINESS SUPPORT: SMALL RURAL BUSINESS SUPPORT

Question 23
How would you rate your broad satisfaction with the proposals for Small Rural Business Support?

Quite satisfied

If you are dissatisfied, please briefly outline your reasons.
SRUC is quite satisfied with the proposals for Small Rural Business Support.

We are pleased that support for farm diversification will be continued, particularly as there has been a funding hiatus for many sound proposals that need support in recent years. It is also encouraging that non-agricultural business and social enterprises can be supported in the creation / diversification of their activities. We do have concerns that support to existing businesses will be limited to activities never carried out by the enterprise in question at the time of applying for support.

Our concerns lie with the fact that this will exclude growing businesses, particularly those that have taken small steps to “test the water” and grow their business slowly, yet still face considerable risks during the growth phase of their business (where a large proportion of businesses fail). Whilst we largely support the types of eligible support we raise questions regarding the rationale for supporting renewable energy production (paragraph 269) given the available incentives, and the confusion encountered from Rural Priorities and FITs during the early part of the SRDP 2007-2013 programme. We also voice concern that there appears to be no support for agricultural diversification (e.g. meat goats, bison, non-food crops) where there are often significant business risks and bespoke capital equipment requirements.

SECTION 13: NON-AGRICULTURAL BUSINESS SUPPORT: FOOD AND DRINK

Question 24
Should the Scottish Government continue to give significant support to the food and drink sector?

Yes

Question 25
Should selection criteria such as those listed below apply to the Food and Drink Scheme?

- Contribution to the Scottish Government’s overall strategies for economic development and the rural economy: Yes
- Making a contribution to national policies for food and drink: Yes
- Assisting the Scottish Government with its wider social policies: Yes
- Supporting export targets for food and drink sectors: Yes

Question 26
Should steps be taken to streamline processes for food companies including a one stop shop for public support?
Yes

**Question 27**

*How would you rate your broad satisfaction with the proposals for Food and Drink support?*

**Quite satisfied**

*If you are dissatisfied, please briefly outline your reasons.*

Q27: SRUC is quite satisfied with the proposals for Food and Drink Support, although more clarification of the measures would require to be made.

Q24: The Scottish Government should continue to give support to the food and drink sector, at the same level and through similar funding mechanisms.

Q26: A one-stop-shop for food and drink companies would be advantageous, although this may be better through Scotland Food & Drink rather than Enterprise Agencies, where access tends to be from larger scale food and drink companies.

**SECTION 14: LEADER**

**Question 28**

*How would you rate your broad satisfaction with the proposals for LEADER?*

**Quite satisfied**

*If you are dissatisfied, please briefly outline your reasons.*

SRUC is quite satisfied with the proposals for LEADER.

There is no mention made of how to work with hard-to-reach groups and communities. Two LEADER LAGs (Dumfries and Galloway, and Ayrshire [in East, North and South Ayrshire]) have devised programmes to deal with this part of social and economic inclusion. It would be good if Government could strongly encourage the LDS to include targeting of those who would not otherwise benefit. Otherwise it is only those with the capacity to engage with LEADER who will be able to develop plans, projects etc., meaning those who cannot do so will be left behind.

Also, although the private sector is mentioned, there is no outlining of how LDS development should specifically encompass the private sector in supporting the greater emphasis on economic development in the new Programme. There have been difficulties in LEADER working with individual private businesses; however, more guidance needs to be given as to potential initiatives which genuinely lead to partnership working to achieve the wider targets under the new Programme.

Although the National Rural Network is discussed elsewhere (Qus. 32-34), it would help to refer to it here, again asking that LEADER LDSs show how they will set up activities and forums for shared learning. The previous programme
has not made as much use as possible of examples and learning from these across Scotland, i.e. between LAGs. The emphasis is on transnational exchange and although this is crucial/vital, the in-Scotland exchange and learning is also critical and needs to be integrated into LDSs.

SECTION 15: KNOWLEDGE TRANSFER AND INNOVATION FUND (KTIF)

Question 29
Do you agree with the range of options listed below which are being included within the KTIF scheme?

Skills development:  
Yes

Vocational training:  
Yes

Monitor farms:  
Yes

Setting up an EIP network:  
Yes

Q30. How would you rate your broad satisfaction with the proposals for KTIF?
Neither satisfied nor dissatisfied

If you are dissatisfied, please briefly outline your reasons.

SRUC is neither satisfied nor dissatisfied with the proposals for KTE.

Work carried out by SRUC’s Innovation and Behaviour Change team has indicated that the suggested KT options often fail to reach a broad range of individuals, but rather a select group of those who tend to engage with these types of activities. Broadening the reach of KT requires activities which incorporate a wider variety of individuals and organisations which make up the innovation systems in question. These must take into account local conditions and the pressures of time/availability.

Increasing importance has been attached to knowledge transfer and exchange policy and practice in Scotland (and elsewhere) recently. This is reflective of developments at European level including the creation of the European Innovation Partnership (EIP) with it strong linkages to the RDP and to the Horizon 2020 research programme.

Within Scotland, this increased interest is reflected in a variety of successful activities. These include Monitor Farms, for example, where the numbers attending the meetings continue to increase as individuals come to appreciate the benefits of this approach.

However, we feel that many of the options outlined in Section 15 are more reflective of somewhat outdated technology transfer approaches, and that much more could be done to promote and encourage novel and collaborative innovation and KTE.
In order that the resources can be used most effectively we suggest that beyond the advisory hub there must be a greater role for the EU concept of technology and innovation translators. In these circumstances, a few key organisations would take a strategic view of how key innovative campaigns or measures would be brokered across broad and diverse areas of Scotland. Small, individual pockets of innovation and KTE bring positive benefits to some communities but in this programme we should seek to make step changes and improvements across multiple audience groups. Training activities can play a useful part in KTE but innovations should be founded in research that is relevant to agriculture and rural audiences and bring about behavioural change at significant scales.

Organisations such as SRUC, the other main research providers and universities involved in Innovation Scotland, must demonstrate their capacity and ability to lead KTIF beyond the coverage in this consultation.

A further uncertainty is just how Scottish KTE leads will work or be involved with the European Innovation Partnership (EIP). Given the modest allocation of £10M to KTIF in Scotland, we require to lever new and additional funding via collaboration.

Further information on SRUC’s perspective on innovation and KTE (including our top ten guidelines for securing an effective innovation and KTE policy) can be found in a recent policy briefing available via our Rural Innovation page (http://www.sruc.ac.uk/info/120292/rural_innovation).

SECTION 16: ADVISORY SERVICE

Question 31
How would you rate your broad satisfaction with the proposals for the Advisory Service?

Neither satisfied nor dissatisfied

If you are dissatisfied, please briefly outline your reasons

SRUC is neither satisfied nor dissatisfied with the proposals for the Advisory Service.

Introduction: (paragraphs 324 and 325)

It is agreed that effective advisory services are a significant contributor to economic and environmental outcomes. For example, between 2009 and 2012, SAC Consulting (a Division of SRUC) assisted nearly 2,500 applications to the Rural Priorities Scheme, 79% of which were successful. This resulted in funding worth £229 million for improving agricultural competitiveness, maintaining and enhancing the natural environment, and improving quality of life in rural areas.

It is also agreed that advice that is both targeted and locally delivered can be more effective in delivering advisory services that achieve impact. Local advice must be based on local knowledge of local issues/circumstances.
coupled with a national understanding of the objectives and outcomes. It is not just the point of delivery that needs to be local, as the advice is more credible if it truly references local circumstances. SAC Consulting, for example, delivers specialist advice and other services to farmers and crofters through its network of 23 Farm Business Service offices across Scotland.

Credible advice is practical and relevant and therefore readily taken up and implemented. Credibility needs to be earned and demonstrated, but where credibility already exists, the delivery will be more effective more quickly than if taken from a standing start (i.e. no track record) or if negative credibility exists (i.e. poor track record). It is worthy of note that SAC Consulting has employed KTE and other extension methods for more than 100 years. In addition, SAC/SRUC has direct access to a world class research programme plus an education and skills division that delivers access to PhD level courses across the geography of Scotland. The benefits of these attributes to the Scottish industry are unrivalled and are openly admired by other parts of the UK and by other countries across Europe.

It is agreed that an expanded advisory service with increased capability is a desirable goal. Expansion should be both in terms of the range of topics as well as the numbers of accredited advisers available to undertake the delivery. The likely increased cost in providing this expansion is recognised.

For the provision of advice targeted on key topics to deliver improved business performance as well as environmental enhancements and climate change impacts the advice will need to be delivered to as many practitioners as possible though both one-to-one and one-to-many mechanisms as proposed.

The principle of a co-ordinated delivery with co-ordination through a Scottish Government hub, means that Scottish Government will indeed have a clear view of the service delivery, but care is needed to ensure that the independence of the advisers and specialists and the confidentiality of the adviser:client relationship is assured particularly in the one-to-one delivery of ILM and other specialist advice.

A strong brand identity for the hub will ensure that all potential users of the advisory service will know where to go for that first point of contact and subsequent signposting.

Purpose: (Paragraph 327)

In our view robustness will be achieved by creating an advisory service based on professional advisers with local knowledge and experience who can operate in the knowledge of funding streams (for both one-to-one and one-to-many delivery) that provides them with stability in the medium term. A funding mechanism based on a series of short-term funding decisions with no longevity does not create robustness and is less likely to allow the creation of professional relationships between advisers and their rural clients that are most effective in achieving the outcomes desired from the Farm Advisory Service.
How it will work (Paragraphs 328 – 334)

The current advisory provision is described as “too fragmented”. This comment reflects the number of agencies and organisations who provide “guidance and advice” in the rural sector. The co-ordination expected through the hub will require the hub to actively work with all of the key agencies and stakeholders to ensure that these advisory service organisations do not duplicate nor contradict. This is especially relevant in the national one-to-many delivery, where a co-ordinated delivery by a single supplier will reduce the risk of overlap or contradiction.

A range of mechanisms is proposed for the hub to deliver advice to farmers and crofters. Care needs to be taken not to place Scottish Government in the position of being both adviser and enforcer at the same time as these roles clearly carry the potential for a conflict of interest. The mechanisms proposed do not generally imply the provision of detailed advice to farmers and crofters, however, advisory delivery by case officers and the operational customer service would run the risk of creating a potential conflict between advisory and enforcement roles.

The need for accreditation to ensure that competent, well trained and informed advisers operate in both the one-to-one and one-to-many delivery mechanisms is accepted. Accreditation must be relevant to the intended delivery and should recognise the abilities and training in communication skills as well as technical knowledge.

The concept of generalist and specialist advisers is accepted, but it is suggested that all general advisers should be capable of providing advice on improving farm business efficiency and effectiveness where Diagram D currently presents these as separate. It is also suggested that many advisers will have dual classification with a general capability matched with a specialist area of knowledge, and this will need to be recognised in the accreditation procedures.

The intent to procure the one-to-many sub-programme is noted. It is suggested that in procuring this the advisory hub is established in advance and has a key role in defining and procuring the deliverer(s). It is further suggested that the delivery of the one-to-many sub programme will be more easily managed and coordinated the fewer sub projects and deliverers there are.

The KTIF events promotion through a single hub is considered desirable, but will require to be complemented by additional promotional activity by the facilitating organisation. The rules on the eligibility of applicants to KTIF should be broadened to encourage a larger number of proposals.

Building on its long experience and combination of local, specialist and general expertise - drawing on our local consultants, the Farming for a Better Climate and Monitor Farms programmes and involvement in the Diffuse Pollution Management Advisory Group, for example - we envisage that SRUC/SAC Consulting will have a very important role to play in the future delivery of advisory services, and in supporting ongoing innovation and KTE,
to increase both the competitiveness of Scotland’s agricultural sector and the sustainability of its rural communities.

Timescales (paragraph 335)

The time line is noted and this appears to agree with the proposal that the hub is established ahead of service procurement. The procurement of or the establishment of the accreditation procedures will either have to be established and available for implementation by the start of the SRDP, or will have to be developed over the same time as early delivery. Consideration may be needed as to whether £200,000 is sufficient to deliver comprehensive adviser training over the three year period.

Please see our response to Section 21 ‘Other Comments’ for further information outlining SAC Consulting’s expertise and experience. This information was also submitted as part of our response to the Stage 1 SRDP consultation, but we feel it remains highly significant to informing this Stage 2 consultation.

SECTION 17: SCOTTISH RURAL NETWORK

Question 32
Do you think the tasks set out below are the most appropriate ways for the SRN to add value to the implementation of the SRDP?

- **SRN website:**
  Yes, should be included

- **Gathering of good programme examples:**
  Yes, should be included

- **Disseminating information to the public:**
  Yes, should be included

- **Organisation of events:**
  Yes, should be included

Are there other activities or services you would like to see the Scottish Rural Network provide? Please specify

In addition: (1) opportunities to engage with Scottish Government Rural Communities team, e.g. through a Q&A online, or at forums or events. (2) linking with the Rural Parliament.

Question 33
Do you agree with the proposal to establish thematic working groups as an approach to supporting the Rural Development Programme priorities?

- **Programme priorities?**
  Yes

If No, please explain your reasons

SRUC agrees with the proposal to establish thematic working groups.
Question 34
How would you rate your broad satisfaction with the proposals for the Scottish Rural Network?

Very satisfied

If you are dissatisfied, please briefly outline your reasons.

SRUC is very satisfied with the proposals for the Scottish Rural Network.

SECTION 18: COMMUNICATIONS

Question 35
How would you rate your broad satisfaction with the proposals for communicating the new Scotland Rural Development Programme?

Neither satisfied nor dissatisfied

If you are dissatisfied, please briefly outline your reasons.

SRUC is neither satisfied nor dissatisfied with proposals for communicating the new SRDP.

This is entirely dependent upon the actual organisations that work with Scottish Government to construct the Advisory Services Hub and the sound management of this collegiate grouping. We also have some reservations regarding the approach to the KTIF (see question 30).

SECTION 19: MONITORING AND EVALUATION

Question 36
Information used to monitor and evaluate the SRDP will be gathered from a mixture of data sources. Three key data sources required to capture monitoring and evaluation data are summarised in 'More information' below. We would welcome feedback on the approach outlined.

Not all the measures can be described at this point and the fact that the EU has already listed 100 indicators would lead us to conclude that an outline such as Table 9 is appropriate at this time.

However, there needs to be an opportunity to evaluate the level of risk of failure for some measures versus the successful outcomes. In addition, clear explanations of the meaning of impact, compliance or performance should be made clear to successful applicants for funding.

Question 37
Are there any other data sources which could inform the impact of the programme?

Yes

If Yes, please specify
It is still too early to consider other data sources that could inform impact. Outcomes from the 2014 REF exercise could inform research and KTE communities as to how impact is measured and perceived by referees of work undertaken.

**Question 38**

The Scottish Government has identified a number of gaps in the indicator requirements and has set out plans for addressing these gaps, outlined in 'More information' below. We would welcome feedback on the proposed approach to filling the gaps in the data (including other data sources) required by the European Commission.

We would agree that there are a number of gaps in the indicator requirements relating to environmental quality, that are not being fully addressed by current research and monitoring activities.

Greenhouse gas emissions from agriculture Although research has identified agriculture and land use as a major source of national GHG emissions (over 20% of total emissions), there is no current or proposed monitoring in place to track changes in emissions from this source. Although national inventories provide a guide to emissions from the sector, they are insufficiently sensitive to attribute emission reductions to specific sectors or mitigation activities. The implementation of such a monitoring programme should therefore be seen as a high priority to achieve targets in GHG emission reduction set out in the Climate Change Act.

Water abstraction in agriculture We would agree that it should be possible to add this to capture this in the Survey on Agricultural Production Methods.

**Water quality**

Methods currently being devised alongside SEPA's ongoing monitoring programme should be able to contribute to an assessment of effects of land use on water quality, but additional expert interpretation of data is likely to be necessary.

**Soil Quality**

The existing Land Use/Cover Area frame Survey is unlikely on its own to be useful in assessing soil quality. The National soils database and a range of other indicators linked to land use will be important, but it would be necessary to use expert advice to supplement these data sources.

**Soil Erosion**

Soil erosion risk can be linked to various aspects of soil quality. The same data sources used to assess soil quality would therefore be important here, alongside expert judgement.
Question 39
Are there any other gaps that you wish to make us aware of?

No

Question 40
Are there any other data sources which could help us fill the data gaps?

Yes

If Yes, please specify

It is too early at this stage to be able to identify specific data sources to fill data gaps.

SECTION 20: IMPACT ASSESSMENTS

Question 41
We would welcome comments on the BRIA

No SRUC response

Question 42
We would welcome comments on the EQIA

No SRUC response

SECTION 21: OTHER COMMENTS

If you have any further comments, please write them in the box below

SRUC would like to submit the following additional comments in response to Q31 on Advisory Activity.

SRUC/SAC – A Century of Experience SRUC is very aware of the renaissance of interest in the contributions that innovation brokers, knowledge transfer and exchange, and advisory services can make to improving the delivery and competitiveness of agricultural and rural services. This is now recognised in the EU across the European Innovation Partnership (EIP) with linkage to RDP and the Horizon 2020 research programme. In addition, strong representation of KTE measures are to be found in the new UK Agri-Tech strategy and the Scottish Government’s own strategic research programme (2011-16).

It is worthy of note that SAC Consulting (a Division of SRUC) has employed these KTE and other extension methods for more than 100 years. In addition, unlike many innovation brokers, state advisory services and subscriber-based organisations, SAC/SRUC has direct access to a world class research programme plus an education and skills Division that delivers from access to PhD level courses across the geography of Scotland. Importantly, in the face of declining budgets and increasing demands on our sector, the SAC/SRUC – derived advisory service is unique in delivering from one Scottish organisation specialist multidisciplinary advice, a national support platform and a policy
responsive business ethos. Scotland has retained a country-wide approach to farm advisory and support services which is integrated through the work of SAC/SRUC while other countries have disbanded their integrated systems and lost the associated advantages. Thus, the benefits of these attributes to the Scottish industry are unique and unrivalled and are openly admired by other countries across Europe.

Our century of experience as the leading, independent advisory service for Scotland and the growth of SRUC has secured a strong platform that SRDP beneficiaries can use to address the needs of our industry. Our contemporary services are summarised below:

From 23 Farm Business Service offices, SAC Consulting, a Division of SRUC, delivers specialist advice and other services to farmers and crofters in Scotland.

Advisory Activities include:

- Consultancy services to small holders, crofters and farmers in Scotland’s remote areas, funded through the Scottish Government Veterinary and Advisory Service (VAS) programme.
- Advice, information and industry intelligence supplied to members of the SAC Consulting Subscription Scheme.
- Ensuring clients’ IACS applications for CAP Single Farm Payments comply with regulations.
- Organising courses, on-farm demonstrations and other open invitation events.
- Training flock-masters to use SRUC’s “Sheep Record Right” guide and comply with sheep identification rules.
- Helping deliver the Scottish Government New Entrants to Farming programme.
- Providing market intelligence and technical support to Scotland’s organic farming sector.
- Producing technical publications such as the Farm Management Handbook and advice on farm woodland management, diversification, soil nutrient management and business efficiency programmes.

Research commissioned from economists and other SRUC specialists, including those from our Rural Policy Centre, informs decision making by policy makers and industry. Experts in the sciences of soils, livestock, crops, biodiversity and carbon management work to benefit farmers or inform national and global research programmes. Topics include the cost of a policy change, improving soil structure, new crop varieties, better animal welfare and reducing greenhouse gas emissions.

Our Impact on Agriculture and the Rural Economy Through consultancy activities founded in cutting edge research, we help our customers embrace innovation to become more competitive and sustainable. A team of more than
375 consultants, veterinarians, technicians and support staff are proud to deliver independent, quality and accessible services to more than 12,500 farmer, rural business, food processing and supplier markets. Our activities span the length and breadth of the UK.

Almost 7,400 clients subscribe to our Farm and Rural Business Services each year. The £1.7 million those customers invest in our advisory services results in annual benefits to their businesses valuing an estimated £7.9 million.

Consultancy and advice has not only a financial impact but also drives efficiency and supports innovation and the application of new technologies. We assist many farming clients in applying for financial support through the Common Agricultural Policy (CAP). In 2011, this resulted in approximately £189 million in support payments to Scottish farmers:

- We completed 6,000 IACS forms for Single Farm Payments through the CAP (more than a third of all Scottish applications), which resulted in payments to Scottish farmers of £163 million. Some 95% of IACS applications (ex SAC Consulting) were online, this accounts for almost 50% of the total online applications across Scotland.

- Payments resulting from applications to the Scottish Beef Calf Scheme totalled at least £7.1 million.

- Applications for Less Favoured Area support payment through the CAP brought in £19 million to help sustain farming in disadvantaged areas.

In addition, we help our customers with applications for support through the Scotland Rural Development Programme (SRDP) competitive Rural Priorities scheme. Between 2009 and 2012, we assisted with nearly 2500 applications, 79% of which were successful. This resulted in funding worth £229 million for improving agricultural competitiveness, maintaining and enhancing the natural environment, and improving quality of life in rural areas.

Conclusions

SRUC concludes that the significant positive impacts that our existing integrated advisory services have delivered (see above) can only usefully bring further benefits to the agricultural and rural sectors that we serve. The new SRDP policy environment may have complexity, however, we intend to lead potential beneficiaries in the sector to secure thriving, sustainable businesses and thus contribute to the Scottish Government’s overall purpose of sustainable economic growth.

As noted above, the benefits of the integrated Scottish farm advisory and support services system are unique and openly admired. If changes are made to future SRDP arrangements which undermine the substantial benefits of the current system and its delivery mechanisms – not least its credibility and its local specificity - this is likely to have severe negative consequences for the competitiveness and sustainability of the land-based sector across Scotland, which may take years to rectify.