NFU Scotland welcomes the opportunity to submit written views to the Rural Economy and Connectivity Committee (RECC) on the proposed National Islands Plan (NIP).

NFU Scotland (NFUS) represents over 8,500 farmers and crofters in Scotland. Of these, just over 1000 NFUS members live and work on Scottish islands and will be directly and indirectly affected by any proposals put forward in the National Islands Plan.

We operate a network of local branches throughout the islands of Scotland, and have members on the following islands: Arran, Bute, Coll, Colonsay, Cumbrae, Easdale, Eigg, Gigha, Iona, Islay, Jura, Kerrera, Lismore, Luing, Mull, Orkney, Shetland, Skye, Tiree and the Western Isles.

NFU Scotland believes that the main objective of a NIP should be to make the islands economically, environmentally and socially viable places to live and work for the islanders.

This should include shaping an environment that allows farming and crofting to prosper, and underpin a vibrant wider economy, that enjoys the same access to services as the remainder of Scotland.

The overarching 13 Strategic Objectives appear to be the ones that have been identified by the local communities, much however, will depend on the detail within the objectives, the identified actions and how effectively then can be delivered.

NFU Scotland welcomes the recognition that the plan should embrace an integrated approach to policy. In that respect, we would suggest that the first four strategic priorities (Population Levels; Sustainable Economic Development; Transport and Housing) should be given equal weighting, as they are all inextricably linked and vital to the survival and prosperity of the island communities.

Equally the actions identified within each strategic priority need to be fully integrated with other actions, for example the ambition to reverse population decline needs to be fully integrated with proposals to stimulate economic development and provision for affordable and accessible housing.
Whilst the NIP recognises the importance of the European Union (EU) Cohesion Policy and its related funds, NFU Scotland believes that recognition should also be given within the plan to the significance of the Common Agricultural Policy (CAP) and the associated Pillar 1 and Pillar 2 funding and the corresponding contribution to the island economies.

Agricultural activity plays a vital part of the rural economy on many, if not all, our islands, with farmers and crofters being the backbone of many island communities.

Island landscapes and the associated natural heritage, including many species and habitats of international significance, are some of the most beautiful and biodiverse in the country. This is in part, a testament to the husbandry and guardianship provided by our farmers and crofters.

Active farming and crofting not only produces food, but supports many other up-stream and down-stream businesses and other vital industries such as tourism and the wider food and drink sector.

NFU Scotland believes it is vital, therefore, in setting out a NIP that agriculture is fully considered.

**Strategic Objective 2: To improve and promote sustainable economic development**

NFU Scotland welcomes the inclusion of actions identified to support agriculture and crofting. However, specific reference should be made in the NIP to the potential impact that leaving the EU will have on our island farmers and crofters, with actions identified that can help to mitigate and alleviate these impacts.

We believe it is imperative to recognise the importance of agricultural support schemes that underpin agricultural activity on the islands; for example the Less Favoured Areas Support Scheme (LFASS) and the Island Scottish Beef Calf Scheme (SBCS) are vital support mechanisms for island farmers and crofters.

Other schemes within the Scottish Rural Development Programme (SRDP) have also been vital in supporting island farmers and crofters, such as the Agricultural Environment and Climate Scheme (AECS) as well as LEADER funding for diversification.
NFU Scotland believes that we must maintain free and frictionless trade with the hugely important markets we have established in Europe; any trade deals negotiated in the future must ensure that goods imported into the UK uphold the world-leading standards of production set by Scottish farmers and crofters; and continued access to non-UK labour is vital to the success of Scottish agriculture and our whole food and drink sector.

Moving away from the Common Agricultural Policy (CAP), we must have a properly-supported future agricultural policy that is bespoke to the needs of Scottish farming and crofting.

Future agricultural policy should aim to mitigate the particular challenges that island farmers and crofters face, but also to support the many public benefits that active farmers and crofters can deliver on the islands; for example in relation to climate change, water quality, biodiversity, landscape management and public access.

The needs of our island farmers and crofters must be fully addressed in the NIP in order to ensure their continued survival and the positive contribution that they can make, not just to economic development, but also in the delivery of the other NIP strategic priorities of Environmental Wellbeing and Biosecurity and Climate Change and Energy.

Whilst crofting has been identified as a sector that ‘continues to provide jobs and opportunities to island communities’, it must be recognised that the economic viability, and indeed the future of crofting, often depends on there being employment opportunities locally and external to the croft business.

Very few crofting enterprises provide full-time employment for crofters. With poor agricultural returns from the market many croft enterprises are unviable, without that essential off-croft income that supplements the croft income.

Certainly there are opportunities for croft micro-businesses to develop around tourism, local food production and environmental management, and with better digital connectivity these could be maximised to ensure the viability of crofting on our islands.

NFU Scotland particularly welcomes the specific action relation to supporting island abattoirs and would welcome more detail on how ‘sustainable and economical viable operations’ can be delivered.
**Strategic Objective 3: To improve transport services**

Ferry provision: ferry services are an essential service in securing the economic viability of the islands. There has been significant growth in the use of the ferries since the introduction of Road Equivalent Tariff (RET) and the resulting increase in visitor numbers. However, the continuing vessel breakdowns and the ensuing ferry disruptions have highlighted how vulnerable the current ferry service is.

The commitment in the NIP to produce a long-term Ferries Plan that will identify an investment programme for new ferries and development at ports is to be hugely welcomed.

The additional commitment to review the impacts of Road Equivalent Tariff (RET) and consider future ferry fares policy options that will meet the needs of islanders and support island economies is also much needed.

The introduction of RET to the Clyde and Hebrides routes, whilst bringing an increase in ferry traffic and some economic benefits to the islands, has also contributed to the pressure put on the service and ferry infrastructure.

The introduction of RET has certainly benefited those island businesses that are involved in tourism, but many local people believe that RET has brought limited benefits and in fact, for some it has been detrimental.

NFU Scotland members believe that if RET also included commercial freight this could have the potential to bring wider benefits and reduce costs to island communities.

It will be no surprise to island communities that the NIP highlights the increased cost of living on an island; with research showing that the minimum income that households require for an acceptable standard of living in Scotland’s island communities is well above that required in the rest of the UK, and in many cases higher than in other areas of rural Scotland.

The experience of many Scandinavian countries can demonstrate that an affordable, reliable ferry service, with sufficient service provision is vital to the prosperity of island communities.

There are significant concerns that the Scottish Ferry Services: Ferries Plan (2013 - 2022), which set out the future of ferry services until 2022 is failing to deliver the
aspirations of the islands communities that it should serve and does urgently need to be reviewed.

NFU Scotland calls on the Scottish Government and Transport Scotland to accept the recommendations of the NIP and accelerate the much-needed long-term investment in the vessel and port infrastructure.

NFU Scotland would also like to highlight the importance of ferries in transporting livestock from the islands and any ambition by the UK Government to restrict the live export of farm animals must not impact on the ability of island farmers and crofters to sell live animals off the islands.

**Strategic Objective 4: To improve housing on Scottish Islands**

It is to be welcomed that that proposals for the regulation of short-term lets should take account of the unique circumstances of island communities and make special provision for them.

Short-term lets may be contributing to the difficulties within the the local housing stock, either to buy or rent, by making it too expensive for local people to afford, particularly those on lower than average national wages. It should be recognised, however, that the these type of lets can often be a useful source of additional income for farmers and crofters, who have had to diversify to supplement the income they receive from agriculture.

NFU Scotland believe that the answer is not to restrict this type of accommodation provision in a rural context, but to ensure that more affordable housing stock is built to deliver local housing needs.

Relaxation of planning controls could help this by identifying marginal agricultural land, and potentially Common Grazings, that could be released for housing development. However, better quality agricultural land, which is often a limited resource on the islands, should be safeguarded from housing.

NFU Scotland welcomes the recognition given to the importance of the Croft House Grant Scheme (CHGS) and would want to ensure that future funding reflects any increase in construction costs.
Strategic Objective 6: Digital Connectivity

It is now accepted that poor digital connectivity is constraining business development. Government agencies are all moving towards all business activity being done online only, this is severely disadvantaging those with poor internet connectivity.

Farms and crofts are often remotely located and are adversely affected by poor broadband connection. There is a need to harmonise digital connectivity across the islands through better infrastructure investment.

Strategic Objective 8: To improve and promote environmental wellbeing and deal with biosecurity

NFU Scotland believes that this section has a number of omissions and we are disappointed that no recognition is given to the role that active farmers and crofters play in contributing to the maintenance and enhancement of island landscapes and the biodiversity that they are renowned for.

Without agricultural activity, and in particular High Nature Value (HNV) farming, many habitats and species of international significance, could potentially be lost.

The section fails to recognise the importance of agricultural support payments, and in particular the agri-environment payments, that assist farmers and crofters in delivering a range of management options that deliver biodiversity objectives.

There are concerns from our members about how environmental benefits are supported by Government. Access to support payments for agri-environmental schemes can often be difficult for small farms and/or crofts situated on the islands to access or be successful when applying.

Often management prescriptions do not suit the island conditions or requirements. In addition, the costs of drawing up an application, and associated risk of failure, can be greater than the benefit and do not justify the effort or money spent.

The previous Environmental Sensitive Areas (ESA) agri-environment scheme better supported island specific requirements, which have been lost with the introduction of
more generic schemes. There is a concern from some members that these more generic schemes are doing more damage than good.

In addition, there are specific species which are seriously undermining the ability of farmers and crofters to maintain their agriculture activity and deliver on biodiversity objectives.

Two species giving serious concern are geese (protected and non-protected species) and the White-tailed Eagle (or Sea Eagle).

Geese are a significant problem on several islands, such as the Outer Hebrides, the Inner Hebrides and Orkney.

White-tailed eagles are causing significant agricultural impacts on Skye and Mull in particular.

If management of these species is not resolved then there is a high risk of agricultural abandonment or a change in management practices, which may well be detrimental to the islands, not only from an agricultural perspective i.e. loss of critical mass, but also from a wider economic, landscape, biodiversity and social perspective.

NFU Scotland would like to see the objective ‘Protect island biodiversity’ amended to include conservation and enhancement, as the issue is much wider that just protection.

Other environmental issues that are not addressed in this section are the threats from non-native invasive species and the challenges farmers and crofters face in disposing of agricultural waste plastic to conform with the relevant environmental protection regulations.

NFU Scotland would like to see these issues acknowledged and appropriate actions to deal with them identified.

**Strategic Objective 9: To ensure that Scottish islands are at the forefront of contributions to our ambition to end climate change**

NFU Scotland believes that farmers and crofters can be part of the solution to delivering on climate change targets if given the latest in scientific research, guidance and support systems.
It is important, however, that climate change objectives are not seen in isolation from other strategic objectives, such as conserving and enhancing biodiversity and addressing issues around economic development and repopulation.

Our changing climate will bring specific challenges to farmers and crofters, with the constraints imposed by the climate having an impact in terms of the choices that farmers and crofters on the islands have, compared to the choices that someone further south can make in terms of crops grown, finishing systems and choice of markets.

In relation to climate change, it is yet to be seen what effect this will have, but certainly increased rainfall in some areas, increased wave height and more prolonged storm events are already having an impact.

An increase in the number of cancelled ferry journeys as result of more storms can have significant animal welfare implications in relation to cancelled on-island livestock sales, animals not being able to be sent to mainland markets, or vital feed not being delivered, and the knock-on effects this can have.

Accelerated coastal erosion can also have an impact on important coastal habitats and areas like the machairs, and the associated agricultural and biodiversity benefits that they deliver, may well be under threat. Currently the NIP does not identify any actions to address these threats.

**Strategic Objective 13: To support effective implementation of the National Islands Plan**

NFU Scotland welcomes the commitment from Scottish Government to develop indicators applicable to each Strategic Objective in collaboration with stakeholders and island communities.

NFU Scotland would like to contribute to that process and would be able to offer support through involving our local island branches and our farmer and crofter members.

It would be useful in creation of a Young Islanders Network to involve the Scottish Association of Young Farmers Clubs (SAYFC), which are established on some of the islands.
NFU Scotland would suggest that the membership of the National Islands Plan Governance Group should include someone with an agricultural background, to ensure that the relevant issues relating to agriculture and land use are fully addressed.

**Conclusion**

There does not appear to be any reference in the NIP to the proposed Island Communities Impact Assessments (ICIA). The use of ICIA will be an important tool to ensure that the strategic objectives and actions do indeed deliver a benefit to the island communities. The main objectives of the ICIA should be:

To ensure that any future policy developments are robustly ‘island proofed’, considering all the views of those most affected.

To determine the effects of any changes to services and policies on the islands in detail considering practical/ economic/ cultural/ social aspects of island living, this includes crofting and the cultural heritage.

To ensure that the impact of regulation and legislation on island communities is understood and mitigated against where necessary.

Formally acknowledging that island communities are likely to be disadvantaged by a policy decision is one thing, acting to prevent such disadvantage is another entirely. The priority, therefore, must be to encourage alternative policies to be considered when the islands are likely to be at a disadvantage.

It must also be recognised that in any “island proofing” of policy decisions, there are likely to be different effects on different island communities; just because a decision does not have a measurable effect on one island does not mean it would not have a deleterious effect on another.