

LINK Consultation Response

Call for views: The Rural Development (Continuation of Operation)
(Miscellaneous Amendment) (Scotland) Regulations 2024
October 2024



Scottish
Environment
LINK

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Introduction to Scottish Environment LINK

Scottish Environment LINK is the forum for Scotland's voluntary environment community, with over 40 member bodies representing a broad spectrum of environmental interests with the common goal of contributing to a more environmentally sustainable society.

Its member bodies represent a wide community of environmental interest, sharing the common goal of contributing to a more sustainable society. LINK provides a forum for these organisations, enabling informed debate, assisting co-operation within the voluntary sector, and acting as a strong voice for the environment. Acting at local, national and international levels, LINK aims to ensure that the environmental community participates in the development of policy and legislation affecting Scotland.

LINK works mainly through groups of members working together on topics of mutual interest, exploring the issues and developing advocacy to promote sustainable development, respecting environmental limits. This consultation response was written by LINK's Food and Farming Group.

1. Response

Scottish Environment LINK supports the objective of the Scottish Government's Vision for Agriculture to "transform how we support farming and food production in Scotland to become a global leader in sustainable and regenerative agriculture". It is the view of LINK members that achieving this objective requires a much more fundamental shift in how farm funding is delivered than is being taken forward by the Scottish Government.

LINK members accept that cliff edges must be avoided. The sudden end of LFASS, without replacement, would be problematic for many producers in marginal areas. However, an extension of LFASS in its current form until 2030 is undesirable. An evaluation of LFASS commissioned by the Scottish Government found that:

"decoupled payments are at best a weak and blunt tool for influencing land management in ways likely to deliver on the stated policy objectives. Specifically, by imposing only weak conditionality on how land is managed, LFA/ ANC [Areas of Natural Constraint] policy has little leverage on the occurrence or intensity of management activities or their knock-on effects with respect to production, retaining jobs and skills or delivering environmental benefits."(1)

Under the EU's Common Agricultural Policy, as the policy note accompanying this statutory instrument acknowledges, this support is being phased out. It is hard to reconcile the objectives of the Vision for Agriculture's with the reality of continuing a "weak and blunt" scheme until the end of the decade which is already being phased out in the EU.

LINK has previously proposed the introduction of a High Nature Value farming support scheme as a replacement for LFASS, and would again encourage Ministers to consider this alternative approach, which LINK members believe would be better suited to deliver the government's intended outcomes.(2)

We are aware of a wider concern held by some, including MSPs, about the ability of the committee to effectively scrutinise individual statutory instruments in the absence of a Rural Support Plan. It is difficult in this instance to make meaningful decisions on the continuation of LFASS without a clear understanding of the wider changes expected to farm funding. It is particularly hard to justify an extension to 2030 in this context.



One component of the Scotland Rural Development Programme which must be continued in the short term is the Agri-Environment-Climate Scheme (AECS). The passing of this SSI will enable this scheme to continue until such time as it can be developed and become a core component of the new four tier framework (currently proposed for consideration in Tier 3 from 2027 onwards). AECS supports farmers and crofters to undertake environmental land management thereby contributing to nature restoration and tackling climate change. Support for conversion to, and maintenance of, organic farming is also supported via AECS. As it stands, AECS is the only farm payment scheme, out of all the retained EU CAP schemes, which is explicitly focused on addressing the nature and climate crisis. It is disappointing therefore that the Scottish Government has chosen to cut funding for AECS in recent years whilst maintaining funding for LFASS. Scottish Environment LINK wants to see funding for AECS increase in the forthcoming Scottish budget.

1. <https://www.gov.scot/publications/evaluation-less-favoured-area-support-scheme-lfass-development-areas-natural/pages/1/>
2. <https://www.scotlink.org/publication/briefing-supporting-high-nature-value-farming-and-crofting/>

This response was compiled on behalf of LINK Food and Farming Group.

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