

Scotland Rural Development Programme 2014-2020



RESPONDENT INFORMATION FORM

Please Note this form **must** be returned with your response to ensure that we handle your response appropriately

1. Name/Organisation

Organisation Name

Scottish Crofting Federation

Title Mr Ms Mrs Miss Dr Please tick as appropriate

Surname

Krause

Forename

Patrick

2. Postal Address

Unit 26

Kyle Industrial Estate

Kyle of Lochalsh

IV40 8AX

01599 530005

hq@crofting.org

3. Please indicate which category best describes you or your organisation (Tick one only)

| INDIVIDUAL WITH PRIMARY INTEREST IN: | |
|--|--------------------------|
| Farming | <input type="checkbox"/> |
| Forestry | <input type="checkbox"/> |
| Fishing | <input type="checkbox"/> |
| Deer or game management | <input type="checkbox"/> |
| General land management (or interest in a combination of land uses) | <input type="checkbox"/> |
| Other rural community issues | <input type="checkbox"/> |
| Other - Please State: | <input type="checkbox"/> |
| ORGANISATION WITH PRIMARY INTEREST IN: | |
| Public Bodies (National) | <input type="checkbox"/> |
| Local Authorities and other local public bodies | <input type="checkbox"/> |
| Environmental and Nature conservation organisations, charities and representative bodies | <input type="checkbox"/> |
| Deer or game management organisations, charities and representative bodies | <input type="checkbox"/> |

| | |
|--|-------------------------------------|
| Farming organisations, charities and representative bodies | <input type="checkbox"/> |
| Forestry organisations, charities and representative bodies | <input type="checkbox"/> |
| Fishing organisations, charities and representative bodies | <input type="checkbox"/> |
| General land management organisation, charities or representative bodies | <input checked="" type="checkbox"/> |
| Local community organisation, charities or representative bodies | <input type="checkbox"/> |
| Other - Please State: | <input type="checkbox"/> |

4. Permissions - I am responding as...

Individual / Group/Organisation

Please tick as appropriate

(a) Do you agree to your response being made available to the public (in Scottish Government library and/or on the Scottish Government web site)?

Please tick as appropriate

Yes No

(b) Where confidentiality is not requested, we will make your responses available to the public on the following basis

Please tick ONE of the following boxes

Yes, make my response, name and address all available

or

Yes, make my response available, but not my name and address

or

Yes, make my response and name available, but not my address

(c) The name and address of your organisation **will be** made available to the public (in the Scottish Government library and/or on the Scottish Government web site).

Are you content for your **response** to be made available?

Please tick as appropriate

Yes No

(d) We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Please tick as appropriate

Yes

SCOTLAND RURAL DEVELOPMENT PROGRAMME (SRDP) 2014-2020: CONSULTATION QUESTIONS:

We are inviting written responses to this consultation paper and respondents can reply to all of the questions, or a selection, depending on where their interests lie. Everything you tell us will help us design a better SRDP. The consultation takes place over an eight week period and closes on **Sunday 30 June 2013**.

Please send your response with the completed Respondent Information Form to either:

SRDP2014-2020Consultation@scotland.gsi.gov.uk

or

SRDP 2014-2020 Consultation
D Spur
Saughton House
Edinburgh
EH11 3XD

SECTION 2 : SETTING THE CONTEXT

Question 1: Given the EU's Common Strategic Framework approach do you agree or disagree that EU funds in Scotland should be marshalled into three funds (paragraph 27)?

Agree Disagree

Please explain your views.

Broadly speaking we have no objection to the approach suggested but as there is no detail of what Competitiveness, innovation and jobs; Low carbon, resource efficiency and environment; Local development and social inclusion; will consist of, we cannot make further comment save to say that present initiatives such as the FPM&C and SDS must continue in some form.

Question 2: Do you agree or disagree with the proposed establishment of a single Programme Monitoring Committee to ensure all EU funds are targeted effectively (paragraph 29)?

Agree Disagree

Please explain your views.

A single PMC can integrate the funding streams and help to ensure a 'joined up' approach to development; however we envisage that sub-committees or working groups will be necessary to ensure the level of expertise that each funding stream will require to deliver effectively.

SECTION 3: OUR INVESTMENT PRIORITIES FOR RURAL DEVELOPMENT

Question 3: Given the need to prioritise our spending in the future programme (paragraph 11) which articles do you see as a priority for use within the next programme?

Agree Disagree

Please explain your views.

The articles most appropriate to crofting are:

15 Knowledge transfer and vocational training
16 Advisory
18 Investment
20 Farm business development
21 Basic services
24 Agro-forestry
28 Producer groups
32/33 ANC
36 Cooperation

We also support the use of article 30 Organic, especially in the context of making organic certification more accessible and appropriate to crofting.

SECTION 5: STRATEGIC TARGETING OF INVESTMENTS

Question 4: Do you agree or disagree that we should geographically target our investment to areas where support will make the greatest contribution to our priorities?

Agree Disagree

Please explain your views.

We agree that investment should be geographically targeted with the emphasis on making the greatest contribution to priorities; moving investment from personal to public good, from low-nature value to high nature value, from privileged areas to fragile areas, from naturally endowed areas to areas of natural constraint.

It is essential that SG is clear what outcomes are identified and prioritised.

SECTION 7: DELIVERING THE SRDP: PROGRAMME STRUCTURE

Question 5: Do you agree or disagree that support for small local businesses should be provided through LEADER?

Agree Disagree

Please explain your views.

Yes, but not necessarily exclusively. It is essential that Leader is modified in accordance with suggestions from the evaluation of the current scheme.

Question 6: Do you agree or disagree to the proposal to disband RPACs and replace with a more streamlined assessment process as explained in Section 8?

Agree Disagree

Please explain your views.

We agree on the basis that the RPACs didn't work well so we need to try something else.

Question 7: Do you agree or disagree that LMOs should be removed from the future programme, given the spending restrictions we are likely to face and the need to ensure maximum value from our spending?

Agree Disagree

Please explain your views.

LMOs were favoured by small producers as it is more accessible than RP. The fact that there were not that many appropriate options should not lead to the conclusion that LMOs don't work; make more appropriate options and it will be used. Again, this comes back to clear prioritising; if there is a specific outcome wanted for a targeted area or sector, designing LMOs to achieve the outcome could be very effective.

Question 8: Do you agree or disagree that the Forestry Challenge Funds be discontinued, with WIAT being funded through Rural Priorities and F4P funding being provided via LEADER?

Agree Disagree

Please explain your views.

We don't have a view on this specifically but we think that Article 24 should be used to encourage agro-forestry schemes, something sorely lacking in Scotland.

Question 9: Do you agree or disagree that Food and Drink grants be decided via the wider decision-making process for business development applications or should they remain separate and managed within the Scottish Government as is the current practice?

Agree Disagree

Please explain your views.

The FPM&C scheme works well (managed by SG) so we would have no reason to press for this to be changed. However, there doesn't seem to be a logical reason for some schemes being managed outwith the rest of the

SRDP decision making process.

Question 10: Do you agree or disagree with crofting stakeholders that a Crofting Support Scheme is established in the new programme that will fund all grants relevant to crofting?

Agree Disagree

Please explain your views

Crofting, whilst widely recognised as very important and positive in population retention in remote and fragile communities, environmental protection, biodiversity, carbon reduction etc, was supported by the current SRDP quite appallingly. There has been a lot of work carried out to try to identify why and to suggest ways of reversing this in the new SRDP. The result of these deliberations is the suggestion of a Crofting Support Scheme. This is well documented and SCF support these findings.

Question 11: If a Crofting Support Scheme is developed, do you agree or disagree that crofters (and potentially small landholders) be restricted from applying for other SRDP schemes which offer similar support?

Agree Disagree

Please explain your views.

As there is no detail of what a Crofting Support Scheme would contain it cannot be decided at this stage whether crofters would need to access other schemes or not.

Should the CSS have everything within it (measures and money) to encourage crofters to deliver all the desired outcomes (to continue crofting being pretty high on the list) then the schemes could be mutually exclusive. But having seen crofting fare so poorly in the current SRDP it would not be unfair to predict that the CSS would not satisfy all requirements and there would therefore likely be need for crofters to apply to wider SRDP measures.

The principle of avoiding duplication is perhaps a bit of a red herring; if the appropriate measure exists within the CSS there would be no need for the crofter to seek support elsewhere, and if they did, so what? This would only be a perceived problem to administrators where the non-crofter scheme was deliberately designed to offer greater support than the crofting scheme.

We would not want to see similar schemes outwith the CSS offering non-crofters better support than the equivalent measure within the CSS. An example of this happening in the past is where crofters have a Croft House Grant Scheme and were excluded from applying to the Rural Home Ownership Grant Scheme. However, recipients of the RHOGS could obtain much higher intervention rates.

Question 12: 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?

Agree Disagree

Please explain your views.

The suggestion that a specific scheme should extend to other small holdings in the crofting counties that deliver the same desired outcomes is understood. However, there are valid reasons, we believe, for why this should not be the case:

1. It is very difficult to measure and compare 'like-economic-status' and this concept is not really relevant anymore;
2. Crofting is a regulated system of tenure – regulated by specific legislation related only to crofting. It imposes burdens upon crofts that small holdings do not have. It is widely perceived that this regulation delivers public goods, so crofters should be recognised and given additional support for it;
3. Most small-holdings (by virtue of the crofting Reform (Scotland) Act 2007, which itself indicates that it is the Scottish Government's desire to create more crofts) can become registered crofts and should therefore benefit from support measures only available to registered crofts. Should they not be able to convert to croft status or, having done so, not be eligible for crofting support then it is the legislation that needs to be addressed, not the support scheme.

Question 13: Do you agree or disagree with the proposed replacement of the Skills Development Scheme with an Innovation Challenge Fund?

Agree Disagree

Please explain your views.

Knowledge sharing and training is needed in the crofting areas. The case for replacing the Skills Development Scheme by an Innovation Challenge Fund has not been made convincingly. The SDS has been an effective scheme and we would be happy for it to continue but if there is a case for change and the change will improve provision of training and knowledge-sharing activities then we would support it.

Question 14: Do you agree or disagree with the measures proposed by the New Entrant Panel (paragraph 92) to encourage new entrants to farming?

Agree Disagree

Please explain your views.

SCF is very keen to promote any scheme that will help bring in new croft entrants. We agree with the measures proposed by the new entrant panel –

and emphasise the need for support to new entrant crofters. We have always made the case, and still do, that new entrants should provide a plan, should be monitored and help provided should they need it.

SECTION 8: APPLICATION AND ASSESSMENT PROCESS FOR AGRICULTURE, ENVIRONMENT, LANDSCAPE AND FORESTRY

Question 15: Do you agree or disagree with the proposed case officer approach to the assessment of applications?

Agree Disagree

Please explain your views.

Our concern is that case-officers, being human, vary a lot in their approach and their understanding of the standards required – resulting in inconsistency. This approach would therefore rely on very thorough training and continual monitoring, support and assessment of the case-officers.

This approach also relies on there being an effective, independent advisory service.

So, if these are in place, we can agree with the suggestion.

Question 16: Do you agree or disagree with the proposed single entry route for applications with a two level assessment process?

Agree Disagree

Please explain your views.

Yes, given the above criteria, a single entry route with a two level assessment process could work.

Question 17: Do you agree or disagree with the proposed negotiation of variable intervention rates rather than setting fixed intervention rates?

Agree Disagree

Please explain your views.

If there were to be variable intervention rates, which in principle we are not opposed to, they would have to be clearly laid out incrementally showing what measures would be required or under what circumstances higher intervention rates could be earned. It would not be a 'negotiation' which is too subjective.

Question 18: Do you agree or disagree with the proposed setting of regional budgets across the Rural Development Regulation (RDR) articles?

Agree Disagree

Please explain your views.

Regionalisation is a double-edged sword – it seems to make sense to put more investment to areas in greatest need (which would possibly favour the crofting counties) but it can be used to achieve the opposite. If the prioritisation of outcomes desired is thorough and set in advance through stakeholder engagement, regionalisation would not necessarily be needed – the applicant can either provide the desired outcomes or not.

We are therefore happy to agree to regionalisation providing that the justification can show clearly why the intervention has been regionalised – i.e. what desired outcome does it fulfil in comparison to other regions.

Question 19: What support and assistance do you think applicants will need for this application process to work effectively?

Please explain your views.

Crofters need clear, impartial advice on what support is appropriate to them and how they access it, and assistance available in making an application. This has been lacking in the present SRDP.

For collaborative applications facilitation needs to be provided or paid for in advance to help put an application together.

SECTION 9: INTEGRATED INVESTMENTS

Question 20: Do you agree or disagree with the value of developing a descriptive map of holdings to help farmers and stakeholders understand the potential ecosystem value of specific holdings?

Agree Disagree

Please explain your views.

This could be very helpful, if the data the maps are based on is accurate and appropriate.

Question 21: Do you agree or disagree with the proposal to allow applicants to submit single applications which set out all investments/projects that the applicant would like to take forward on their land?

Agree Disagree

Please explain your views.

If the measures used are related then it makes sense to look at them holistically and to put them together as an integrated application. This should not stop applications for individual measures, or for an integrated application to be funded and implemented in stages.

SECTION 10

Question 22: Do you agree or disagree that it would be helpful to allow third party applications for specific landscape scale projects?

Agree Disagree

Please explain your views.

This could be a useful provision in applications for work on common grazings where a common grazings application needs help from a third party. However we have concerns that this provision could be misused by a third party so we emphasise that the control of what happens on common grazings must remain with the grazings committee.

Question 23: Do you agree or disagree with public agencies working together to identify priority areas that could benefit from a co-ordinated third party application?

Agree Disagree

Please explain your views.

Yes, in collaboration with the land managers' representative – i.e. grazings committee in the case of common grazings.

Question 24: Do you agree or disagree with the establishment of a separate fund to support collective action at the landscape scale?

Agree Disagree

Please explain your views.

It is not clear why there would be a need for a separate fund (we are neither for nor against) as collaborative approaches should cut across different schemes and therefore budget allocations. So saying, we are strongly in support of collaborative applications so if a separate fund facilitates this we will support it.

SECTION 11: ADVISORY SERVICE

Question 25: Do you agree or disagree with broadening the Whole Farm Review Scheme to include biodiversity, environment, forestry, water pollution control and waste management?

Agree Disagree

Please explain your views.

We like the theory of this and support the intention. The reality is that whole croft reviews have not been successful. If you can find a way of making them more attractive then we support it.

Question 26: Do you agree or disagree that we allocate SRDP budget to advice provision when we move to the next programme?

Agree Disagree

Please explain your views.

If there is not adequate advice crofters do not use SRDP support.

SECTION 12: FINANCIAL INSTRUMENTS

Question 27: What are your views on the merits of providing loans for specific purposes and/or specific sectors?

Please explain your views.

Loans are essential. The CHGS lost this provision when it moved from CBGLS and has caused a huge lack in croft house building. Crofters find it difficult to secure loans so appropriate provision has to be sorted out.

SECTION 13: VOLUNTARY MODULATION

Question 28: Do you agree or disagree with the proposal to maintain the current level of transfer from Direct Payments to SRDP in the new programme period?

Agree Disagree

Please explain your views.

The current level is not adequate. SCF support maximum transfer of resources from Pillar 1 to Pillar 2.

SECTION 14: EQUALITIES IMPACT ASSESSMENT (EQIA)

Question 29: Please tell us about any potential impacts, either positive or negative; you feel the proposals in this consultation document may have on any of the equalities characteristics listed in paragraph 136.

Comments