

## Scottish Crofting Federation Response

The below text is the Scottish Crofting Federation's full response to the above consultation.

### **Section 4: Budget for SRDP 2014-2020**

#### **Q1. How would you rate your satisfaction with the budget as a whole?**

Quite dissatisfied

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

Forestry – This is a large proportion of the budget allocation. There are concerns that forestry schemes if not appropriately targeted, could lead to the loss of good agricultural land. If looking at forestry as climate change mitigation it would make sense to put more of this budget into peatland management as peatlands sequester far more carbon than trees do;

Agri-Environment – Climate – 15m for peatland restoration – budget should be higher and include peatland maintenance;

New Entrants – would like to see targeting towards crofting new entrants.

Crofters and Smallholders Grants – while this budget has increased by only 60%, the potential number of applicants has increased by over 100%. We are concerned that if the proposed extension takes place taking in 73% of holdings, the money will be spread too thinly.

### **Section 5: Rural Regional Delivery Partnership for Land Based Investments**

#### **Q2. Are you broadly satisfied with the new application and assessment process for land based investments outlined in Section 5?**

Neither satisfied nor dissatisfied

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

With regards to the agri-environment schemes - It is not clear from the consultation how the new scheme will work in practice; however we support the concept of approving applications on an on-going basis, which suggests that there would be a level playing field for all applications. We would like to see a fair and accessible system for smaller units, with possible weighting to their benefit. Anything that can be done to make agri-environment schemes more widely available to all will be of benefit, especially if it helps to minimise the cost of the application process.

### **Section 6: Future Support for Less Favoured Areas**

#### **Q3. Should support for farmers operating in constrained areas be continued through the SRDP?**

Other, please specify below

Support should be more targeted to the fragile areas. Conversion to ANC as soon as possible. LFASS must be remodelled in the intervening period to ensure the more fragile areas receive more funding. Any potential abuse of this scheme could be minimised by using a minimum agricultural use or a suitable minimum stocking density.

## **Section 7: New Entrants Scheme**

### **Q4. How would you rate your satisfaction with the proposals for the New Entrants Scheme?**

Quite dissatisfied

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

There is no mention of how this scheme could be of benefit to new entrants to crofting. There could be a similar scheme targeted at crofting with a proportion of the allocated budget. If it was to be available it could be used as 'match' funding for CCAGS for capital investments.

## **Section 8: Crofting and Small Farm Support Scheme**

### **Q5. Should the scheme be expanded to provide capital support to small farms?**

No

### **Q6. Is a 3 to 50 hectare range appropriate for defining a small land holding?**

No

### **Q7. Do you agree with the proposal for grants of £500 to be available to assist the establishment of Grazings Committees?**

Yes

### **Q8. How would you rate your broad satisfaction with the proposals for the Crofters and Smallholders Scheme?**

Very dissatisfied

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

There should continue to be a croft-only support scheme. CCAGS was put in place to support those in the remote and fragile areas. There is no rationale to open it to areas outside the crofting counties. Within the crofting counties small holdings of like economic status can convert to crofts under crofting legislation. There is therefore no rationale to open it non-croft holdings.

Regulation is vital for protecting land by reducing speculation for development, reducing amalgamation and fragmentation of units and contributing to the retention of people and communities. Small holdings in the crofting counties should therefore be encouraged to convert to croft status.

The crofting support scheme should be easier to apply for and so increase uptake.

The scheme should be available to all registered crofts regardless of size, with no upper or lower limit.

With regards to intervention rates we would like to see fixed rates instead of "up to" as this could lead to potential variances between individual cases.

We think that the 'Related Information' does not accurately reflect the responses in the stage 1 consultation.

## **Section 9: Agri-Environment-Climate Scheme**

### **Q9. How would you rate your broad satisfaction with the proposal for the Agri-Environment-Climate Scheme?**

Quite satisfied

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

The concept of approving applications on an on-going basis suggests that there would be a level playing field for all applications. Anything that can be done to make agri-environment schemes more widely available will be of benefit, especially if it helps to minimise the cost of the application process. The number of crofting specific options was disappointing however; more specific options or weighting to the benefit of smaller units could ensure a higher uptake by crofters.

## **Section 10: Forestry Grant Scheme**

**Q10. 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

**Q11. 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

**Q12. Are there any other woodland types that should be supported? If Yes, please specify**

Yes

1, 2 and 3 to be open to crofter forestry even in areas with limited access to roads. Productive forestry could be harvested and used locally in a rural development model of forestry. e.g. productive larch forest for use in fencing, building and cladding locally without need for infrastructure suitable for huge timber lorries.

**Q13. Should the Central Scotland Green Network be allowed an 'Additional Cost Contribution'? If No, please briefly explain your reasons**

Yes

But equally crofter forestry to have 'Additional Cost Contribution' because of enhanced costs due to remoteness.

**Q14. 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 3

**Please explain your choice**

We are not that familiar with the SRDP payment process but would suggest:

Para 227 indicates that the new scheme allows for 100% of standard costs to be paid for woodland creation which is why we should argue for an uplift in standard costs for crofter forestry. Income Foregone payments can go against land where there was agricultural activity but no entitlement to Direct Payments. If payments would be reduced to 7 years (instead of 12) but 100% establishment costs with uplifted standard cost would suit crofters best. Enhanced payments up front might suit crofter forestry cash flows better.

**Q15. 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

**Bracken contribution:**

Yes, include

**Community woodland:**

Yes, include

**Q16. Should agroforestry be funded through the SRDP 2014-2020?**

Yes

**Q17. Should tree health be funded through SRDP 2014-2020?**

Yes

**Q18. 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

**Q19. 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

**Q20. 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:**

No opinion

**Woodland Grazing:**

Yes, should be included

**Q21. How would you rate your broad satisfaction with the proposals for the Forestry Scheme**

Quite satisfied

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

The context of "livestock removal" is not clear.

"Grants will be available to encourage cooperative forestry projects". Co-operation could be used to advantage to support grazings committees as they put plans together for woodland developments.

#### **Section 11: Support for Co-operative Action**

**Q22. How would you rate your broad satisfaction with the proposals for co-operation?**

Quite satisfied

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

We would like to see support for projects on common grazings included under this scheme.

#### **Section 12: Non-Agricultural Business Support: Small Rural Business Support**

**Q23. How would you rate your broad satisfaction with the proposals for Small Rural Business Support?**

Quite satisfied

#### **Section 13: Non-Agricultural Business Support: Food and Drink**

**Q24. Should the Scottish Government continue to give significant support to the food and drink sector?**

Yes

**Q25. 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:**

No opinion

**Q26. Should steps be taken to streamline processes for food companies including a one stop shop for public support?**

Yes

**Q27. How would you rate your broad satisfaction with the proposals for Food and Drink support?**

Quite satisfied

#### **Section 14: LEADER**

**Q28. How would you rate your broad satisfaction with the proposals for LEADER?**

Neither satisfied nor dissatisfied

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

Leader didn't work well, was inaccessible, not consistent, fragmented etc. The proposals aren't clear in addressing the failing so we will have to see in practice.

#### **Section 15: Knowledge Transfer and Innovation Fund (KTIF)**

**Q29. 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?**

Quite satisfied

#### **Section 16: Advisory Service**

**Q31. How would you rate your broad satisfaction with the proposals for the Advisory Service?**

Quite satisfied

**Section 17: Scottish Rural Network**

**Q32. 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

**Q33. Do you agree with the proposal to establish thematic working groups as an approach to supporting the Rural Development Programme priorities?**

Yes

**Q34. How would you rate your broad satisfaction with the proposals for the Scottish Rural Network?**

Quite satisfied

**Section 18: Communications**

**Q35. How would you rate your broad satisfaction with the proposals for communicating the new Scotland Rural Development Programme?**

Quite satisfied

**Section 19: Monitoring and Evaluation**

**Q39. Are there any other gaps that you wish to make us aware of?**

No