

## **SCF response to SG Agriculture transition consultation**

*1. Should agricultural businesses receiving support be required to undertake a level of baseline data collection?*

Yes.

It makes sense to know what the situation is in order to monitor change, so we have to collect data and set appropriate base-lines, according to holding type. It has to be proportional to the size of holding. The individual producer should be able to DIY audit (e.g. we support the methodology used in POBAS). Costs should be covered in full. How would a common grazings be treated?

*2. Should collected data be submitted for national collation?*

Yes.

*If yes, what information should be collated nationally?*

All of it, grouped in similar areas, and enterprise types. There needs to be more than soil / carbon / biodiversity audits – it is very important to get information on wider aspects of land-based enterprise – community, community involvement, local economy etc.

Transparency is important. The information collected should be open and free to access.

*3. What are the next steps that can be taken to commit businesses to continuous improvement utilising the information presented by carbon, soil, biodiversity auditing?*

Feedback and incentives. Making it clear that it is in a business interest to improve too – good business sense, its not just about support payments. Involve the producer as much as possible. Let them see good policy decisions coming out of it. Good PR, emphasising the benefits. All policy has to be croft-proofed, including making sure all schemes are appropriate for common grazings, that inclusion of grazings is not an after-thought. Is 'continuous improvement' possible?

*4. How can baselining activities be incorporated in to common business practices across all farm types?*

Benchmarked across similar holding types. Identify crofts in the data. This is an opportunity to get the producer involved, for government and agents to work together with producers and get away from the inspection and penalty regime.

*5. Should capital funding be limited to only providing support for capital items that have a clear link to reducing greenhouse gas emissions? If not, why not?*

No.

If it's about an environ scheme such as SACGS fair enough, but not for CAGS. Improving biodiversity or animal welfare, or social conditions is worthy of capital support too. The approach has to be holistic.

*6. What role should match funding have in any capital funding?*

Match funding is fair enough, but a loan scheme or up-front funding is essential for those who don't have capital behind them – the people who really need the support. Levels of funding should be set appropriately. Entry to schemes needs to be easy – it should not take an agent to make the application.

*7. What capital funding should be provided to the sector to assist in transformational change, particularly given that in many instances the support called for was directly related productivity or efficiency, that should improve financial returns of the business concerned?*

'Transformational change' needs to be defined and should be about a complete shift in mind-set as to what agriculture is about – it is not just about yields and profit, it is about the biosphere, communities, resilience, public goods. Support should be given to anything that supports responsible, sustainable agriculture.

8. *Should all farm and crofting businesses be incentivised to undertake actions which enhance biodiversity?*

Yes

9. *What actions would be required by the farming and crofting sectors to deliver a significant increase in biodiversity and wider-environmental benefits to address the biodiversity crisis?*

Increase or maintain current best-practice. Broaden what we think of as agriculture - shift from quantity to quality of production. Use more agro-ecological methods. Audit, engage in appropriate training and advice, take appropriate actions to improve.

10. *What do you see as the main opportunities for farmers and land managers in a Just Transition to a net zero economy?*

This is an opportunity for crofting to come into its own and be used as a model for land-use. Stop funding area-based income support schemes which allow those that have to get more, and support payment for public goods. Get land divided up and more people on the land, working in an holistic, environmentally friendly way to produce good food and public goods. This is the opportunity to work with nature – it doesn't have to be food or nature, livestock or trees; it can be both, existing in harmony.

There will be opportunities for common grazings, machair, peatlands, agroforestry. Give support to maintain good practice. Opportunity to increase High Nature Value farming, local food supply, Scottish Crofting Produce, local energy.

Increase in value of good meat.

11. *What do you see as the main barriers for farmers, crofters and land managers in a just transition to a net zero economy?*

Development of appropriate technology – e.g. hydrogen cells. It is harder for crofters in remote areas – transport distances are greater. Changing the production system to have shorter chains. Limitations in crofting practices – lack of options, determined by geography, soil type, low incomes (a crofter isn't going to be able to buy a new electric tractor).

International trade standards could threaten our food produced to higher standards but at an increased cost.

12. *How best can land use change be encouraged on the scale required for Scottish Government to meet its climate change targets?*

We need completely fresh ways of looking at this, driven by public money for public goods and land reform. We have to get away from huge enterprises that are driven by 'farming' public income support. Food production isn't just about commodities and profit. We need bold steps, not just tinkering and pandering to the current mind-set. The industrialisation of agriculture is a failed experiment and we have to embrace many of the older tried and tested methods, as well as new uses of technology. Externalities have to be taken in account when assessing the efficiency of an enterprise.

We need to include many, many more people in producing food and using land in a sustainable way. Agriculture is part of the wider land reform objectives we have in Scotland. Crofting is a model.

Consumers will have to pay more for good food – agricultural subsidies are in great part actually food subsidies. This can change without threatening those on low-income (a false reason given for supporting agricultural subsidies).

We need to see those who gain the most (large companies) having to pay back into the system. Public money is not just for paying for cleaning up – to an extent, the principle 'polluter pays' has to be just.

Promote good practice – it's the right thing to do.

Encourage supply and consumption of our own produce.

Change planning rules; integrate 'silos' – join up the thinking.

Lower holding size eligible for support to 1ha (as in EU).

Include all sorts of sustainable land-based enterprise.

*13. Would incentives for farm plans specifically targeting flock/herd health, soil health, & crop health (for example) demonstrate real improvements in productivity over time?*

Yes.

Improving the health of the base materials (which also includes the health of the family producing the food) is going to improve the health of the system and therefore the outputs. However, 'productivity' isn't the only objective – move from quantity to quality. Optimising land use has to be an objective.

There needs to be a more useful definition of 'productivity' – it isn't just about cash in a few people's pockets.

*14. Should future support be dependent on demonstration of improvements in productivity levels on farm? If so how would this be measured?*

No.

We are concerned with the words 'improvement' and 'productivity'. Maintaining high standards is essential and improvement is of course important, but can only go to certain limits – it would not make sense to base support on 'continuous improvement' when this is not achievable. So more accurately support could be based on improving above a baseline and maintaining that standard or possibly improving upon it, would be the objective. Also, productivity is much more than commodity outputs; it is about delivering good, healthy food in an ecological way. It is about delivering public goods. So 'productivity' has to be redefined in the new model we are transitioning to.

*15. In light of ongoing research activities supported by the Scottish Government and the 2022-2027 research strategy, are additional measures needed to ensure research is supporting the agriculture sector to meet its climate change targets? (If yes, please specify.)*

Yes.

There needs to be more research looking at alternative practices moving away from the seemingly prime objective of increasing commodities for home and export. Appropriate farm / croft-based research disseminating the results in a way that ordinary folk understand and can use.

*16. What importance do you attach to knowledge exchange, skills development and innovation in business?*

High. Training and demonstration, appropriate, relevant, affordable, specific to each sector. Community-based.

*17. What form should tailored, targeted action take to help businesses succeed?*

Demonstration, appropriate training, support for delivery of public goods, press ahead on land reform, make more land available for new entrants. Much of what we have said above applies.

*18. Should continuing professional development be mandatory for businesses receiving public support funding?*

No.

Forced CPD doesn't work – the experiential quality of a CPD event or course is lessened if participants are there "because I have to be". It should be encouraged, incentivised – outcome-based. Good CPD is sought after. Community-led CPD works well. Give funding to community-based organisations such as SCF who run courses that are always over-subscribed.

*19. How can the green credentials of Scottish produce be further developed and enhanced to provide reassurance to both businesses and consumers?*

Good PR and labelling. It has to be honest and fact-based.

Promote recognised standards.

Use Scottish geographic and sectoral indicators such as PGI and SCP.  
Build on projects that promote good credentials.

*20. Should farm assurance be linked to requirements for future support?*

Don't know.

"Linked"? – do you mean compulsory, that support is dependent on belonging to an assurance scheme? If so, then no. We like assurance schemes – it gets standards up, but farm assurance should be based on it being beneficial to the producer and therefore something wanted. As in question 18, government needs to get away from the punitive model and make courses and assurance schemes attractive - appropriate, affordable, accessible for different size, type of business. It should be consumer-led.

*How can ongoing data capture and utilisation be enhanced on Scottish farms and crofts?*

Adaptive management, review outcomes, adapt.

Oversight board to be in place permanently.

Small unit / croft proof.

Cost in the externalities

Look holistically – population retention, conservation grazing, etc.

Identify crofts

Much of what has been said above applies.