

Community Woodlands Association Consultation Response: Implementation of the Common Agricultural Policy Health Check in Scotland

The Community Woodlands Association is pleased to have the opportunity to respond to the consultation on Implementation of The Common Agricultural Policy Health Check in Scotland. We have not provided a detailed response to the 20 questions in the Consultation document – most of our comments are general in nature and might be considered a response to Q20.

The CWA represents over 130 community groups across Scotland, many of whom are actively engaged in land management to deliver a wide range of public benefits: social, environmental and economic.

Scottish Government funding support for our sector has for many years been couched in terms of buying these benefits, and this has been made more explicit with the introduction of the SRDP and its rhetoric of targeting funding to delivering outcomes and provision of public benefit.

We agree that public funding should be directed in this way, but consider it illogical not to extend these principles to all parts of SG subsidy for Land Management, in particular Single Farm Payment, receipt of which should be contingent on compliance with a more meaningful and demanding set of criteria for Good Agricultural and Environmental Condition.

Climate Change is (or should be) the biggest single agenda item in land management: the Scottish Government has made challenging commitments to reduce emissions by 80% by 2050, achieving these necessitates a fundamental restructuring of the way we manage our land and economy.

Agriculture is responsible for c. 25% of Scotland's greenhouse gas emissions, at huge expense to the taxpayer, so given the policy context it is extraordinary that the Consultation fails even to mention climate change.

A thorough restructuring of farming subsidy is needed, starting with an increase in modulation to reinforce funding programmes supporting adaption and mitigation measures, and revision of GAEC (Good Agricultural & Environmental Condition) measures to incorporate the requirement for agricultural holdings to reduce emissions or adopt mitigation measures as a condition of continued receipt of Single Farm Payment.

We note that the Agriculture and Climate Change Stakeholder Group recommended that "the scope for ... enhancing cross-compliance to better control net emissions must be explored". That this recommendation has apparently been ignored casts serious doubt on the Scottish Government's commitment to tackle climate change.

Note : Q1 – Q8 National Envelope provisions

We provided an interim response on the issue of the National Envelope (Qs 1 - 8) by the May 8th deadline, which we reiterate below

Briefly, we do not believe that that the public interest is served by continuing to subsidise agriculture simply for the sake of it and beyond any hope of sustainability. Rather than raise, emotively, fear of "Land Abandonment" the Scottish Government should recognise that greater economic, environmental and social benefits will accrue from encouraging a managed transition to semi-natural habitats, including native woodland. This would have the additional benefit of making some small contribution towards reducing the net Greenhouse Gas emissions of Scottish agriculture

We believe the national envelope provision should not be used in Scotland. The existing SBCS should be phased out over say 3 years, and no successor scheme devised or introduced. On no account should national envelope provisions be used to cover sheep production.