

Agricultural transition in Scotland

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

Yes, baselining should be mandatory for all farm holdings above a certain size threshold (Initially 100ha and progressively reducing).

If it is voluntary then it is likely that baselining will mostly be undertaken by those farm businesses which are already most active in trying to reduce emissions.

2. Should collected data be submitted for national collation?

Yes, the data should be submitted for national collation and made publicly available.

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?

As a condition of support, all agricultural holdings above a certain size threshold (initially 100ha) should be required to produce a land management plan demonstrating (amongst other things) how they will implement measures to reduce emissions identified by farm audits.

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

Making baselining, and acting on the information provided by audits, a requirement of future support is the best way of ensuring that it is incorporated into common business practice.

5. Should capital funding be limited to only providing support for capital items that have a clear link to reducing greenhouse gas emissions?

No. Capital funding should be restricted to items that are directly related to environmental benefits (rather than funding business efficiency measures with secondary environmental benefits), however this should include biodiversity, public access and water quality objectives as well as reducing greenhouse gas emissions.

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

Capital funding should be a contribution to costs, with farm businesses providing a proportion of costs.

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?

Capital funding should not be provided for projects designed primarily to improve financial returns of farm businesses.

Support should be provided to take farm businesses out of production, or to move to significantly lower-carbon methods and production. As the consultation document acknowledges, the measures being suggested do not go anywhere near far enough to meet even the very limited targets for the agriculture sector proposed in the Climate Change Plan update.

As the Committee on Climate Change have made clear, whilst improved farming practices such as better soil and livestock management could deliver some emissions reductions, these will still leave agriculture as one of the biggest emitting sectors. Delivering deep emissions reductions requires fundamental changes in farming practices and consumer behaviours (including reduced production and consumption of the most carbon-intensive foods) to drive the release of land which can be used for afforestation, peatland restoration and biomass production.

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?

All land management businesses should be expected to enhance biodiversity as a condition of receiving public funding.

The most significant action would be to improve the management of existing native woodlands, which are still widely subject to ongoing deforestation as a result of inappropriate grazing levels.

There are a range of other possible actions, including establishment of / contribution to habitat networks, better riparian management, reducing pollution and changes to grazing practices. Whatever actions are supported it is critical that these are demonstrably additional, do not reward past bad practice and are accurately reported (unfortunately this has not been the case under AECS).

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

It is difficult to answer this question when the consultation paper appears to regard a just transition as one which maintains unsustainable levels and forms of production and keep the subsidies flowing at all costs.

However, there are likely to be opportunities for land managers in diversification, whether into forestry or tourism or new forms of low-carbon food production.

A net zero economy implies a significant reduction in transport miles, and there is considerable scope to support innovative businesses to develop low carbon food (and forestry) systems which supply local markets.

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

The main barrier to a just transition is the refusal of the sector and its regulators to recognise the scale of change needed. As long as the myth of “sustainable food production” is perpetuated (despite the huge GHG emissions, the £500million of direct subsidy and the reality that much of what is produced isn’t actually food) it’s unlikely that a land use transition, just or otherwise, will take place.

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

As per the answer to Q7 above, delivering deep emissions reductions requires fundamental changes in farming practices and consumer behaviours, and significant land release.

Importantly, these changes in farm practices - fewer ruminants, less ploughing, reduced inputs of diesel and fertiliser – bring immediate emissions reductions. Woodland creation delivers carbon sequestration and can provide low-carbon materials for construction etc, but not for many years, and whilst peatland restoration reduces emissions whilst delivering biodiversity and water quality benefits, it does not contribute to meeting net zero targets: restored peatland is still considered to be a net emitter.

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

Not answered

14. Should future support be dependent on demonstration of improvements in productivity levels on farm?

No. In many cases desirable environmental outcomes will be delivered by reduced productivity using lower-carbon (and lower cost) methods.

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?

Yes. Research needs a stronger focus on fundamental changes to land use and farm practices to support a genuine transition to a low-carbon economy, rather than tinkering with business as usual.

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

These are very important and will become more so if the fundamental changes in land-use and farm practices needed for a land-use transition are to take place.

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

Not answered

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

Not answered

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

Incorporation of accurate (and independently verified) GHG emissions figures as a prominent part of food labelling and marketing would provide reassurance to consumers and help drive both behaviour change and emissions reductions.

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

No. Farm assurance labelling with bogus claims to sustainability may help ease consumer consciences but will hinder not help behaviour change or emissions reductions on the scale required.

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

Not answered