



## **Agricultural Transition in Scotland: first steps towards our national policy**

### **Respondent Information Form**

Please Note this form must be completed and returned with your response. To find out how we handle your personal data, please see our privacy policy: <https://www.gov.scot/privacy/>

Are you responding as an individual or an organisation?

Individual

#### **Organisation**

Full name or organisation's name: Fisheries Management Scotland

Phone number: 0131 221 6567

Address: Fisheries Management Scotland, 11 Rutland Square, Edinburgh

Postcode: EH1 2AS

Email Address: [general@fms.scot](mailto:general@fms.scot)

The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

**Publish response with name** (Fisheries Management Scotland)

Publish response only (without name)

Do not publish response

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?

**Yes**

No

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## **Consultation questions**

### **Baselining**

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

**Yes**

No

Don't know

please explain your answer

Baseline data collection is important to demonstrate value for money for the taxpayer, which should have at least equal weight to profitability, productivity and efficiency. We note that the suckler beef report identified a number of baseline requirements, including a nutrient management plan. We would emphasise that completing, AND demonstrating adherence to, such plans should be the basis for receipt of payments.

In our view, in the drafting of this consultation document, the biodiversity crisis appears to have less weight than the climate crisis. We would emphasise that twin crises of climate change and biodiversity loss are increasingly being considered together and in our view they should carry equal weight in agricultural support mechanisms. On that basis, biodiversity scoring and monitoring should be a core element of baseline data collection. With regard to the freshwater environment, national programmes such as the National Electrofishing Programme for Scotland (which assesses populations of juvenile fish) and the Scottish River Temperature Monitoring Network have an important role to play. In addition, Scotland's Rivers and Fisheries Trusts and District Salmon Fishery Boards undertake extensive monitoring of the freshwater environment and could work with farmers in developing and delivering such monitoring.

2. Should collected data be submitted for national collation?

**Yes**

No

Don't know

Please explain your answer

It is important that such data is assessed and analysed at a national scale.

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?

Please explain your answer

n/a

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

Please explain your answer

n/a

### **Capital funding**

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

Yes

**No**

Don't know

If not, why not?

See our answer to question 1 above. Reduction of greenhouse gas emissions is crucial, but so is addressing biodiversity loss. In particular, we consider that greater emphasis on protecting the freshwater environment, and associated biodiversity, is urgently required.

We support the principle of capital funding having a role in future support to enable investment for long-term benefits. However, capital funding should not be used to pay for items which are good business practice and would be expected to provide a return on investments.

In recent months, the Scottish Government and SEPA have consulted on measures to address slurry storage (captured in this section of the consultation document) and management of water resources. We would emphasise that adequate protection of the water environment is dependent on both of these aspects being taken forward, and as national priorities should qualify for capital support funding. With regard to water scarcity, SEPA have recognised that a more proactive approach is required if we are to increase the resilience of businesses and reduce the pressure on the water environment during droughts, and this has not been adequately considered in the consultation document. Water scarcity is likely to become a major issue for Scotland in future under existing climate predictions. Water storage for agricultural use during drought conditions was identified in the SEPA consultation as a possible means of better managing water resources, and, subject to our comments above, support through capital funding for this activity should be considered.

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

Please explain your answer

n/a

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?

Please explain your answer

See our comments to question 5 above, related to items which are good business practice and would be expected to provide a return on investments.

## **Biodiversity**

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

**Yes**

No

Don't know

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?

Please explain your answer

The consultation document states that there was very limited support across all groups for significant land use change from agricultural use to forestry, with loss of productive agricultural land identified as a specific concern. However, we would emphasise that riverside tree planting is a vitally important mechanism to mitigate climate-induced warming of our rivers.

In rivers, the optimum temperature range for Atlantic salmon is thought to span 6-20°C. Atlantic salmon exhibit thermal stress at approximately 23°C with mortality at approximately 33°C. Temperatures recorded during the summer of 2018 show that 69% of Scottish rivers experienced temperatures that cause thermal stress for salmon on one or more days.

One of the most effective interventions is the planting of native trees in the riparian zone in order to provide dappled shade and reduce river temperatures. However, standard funding models for tree planting have not yet caught up with the critical conservation need to safeguard our rivers and their wildlife from the impacts of climate change. Funding for planting and ongoing maintenance of these riverside native trees, prioritised according to temperature predictions developed by Marine Scotland Science, would have massive biodiversity benefits, whilst also minimising loss of productive agricultural land (due to existing General Binding Rules).

Diffuse pollution continues to be a significant impact on the water environment, as recognised in the draft third river basin management plan. SEPA do not have the capacity to address this through compliance monitoring and an alternative approach to ensure compliance is required. All public funding should be predicated on achieving full compliance with all current legal requirements relating to environmental protection.

## **Just transition**

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

Please explain your answer

n/a

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

Please explain your answer

n/a

## **Sequestration**

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

Please explain your answer

As discussed above, we consider that focussed riverside planting is an important means of absorbing carbon, whilst also providing significant biodiversity benefits.

## **Productivity**

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

Please explain your answer

One of the strongest arguments for managing diffuse pollution, from a business perspective, is in managing soil. See our earlier comments relating to compliance with environmental standards as a condition of funding.

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

Yes

No

**Don't know**

If so, how would this be measured?

## **Research & Development**

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

No

**Don't know**

If yes, please specify

### **Knowledge & skills**

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

Please explain your answer

We are generally supportive of Continuing Professional Development, but this should add value, reduce costs or have wider societal benefit. With regard to the water environment, we consider that further engagement on farming practices which minimise impacts to the water environment and aquatic habitats would be of great value. We would like to see a greater understanding of the habitat needs of native fish, and the importance of naturally functioning rivers to overall production, particularly in relation to natural river morphology and dredging activities.

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

Please explain your answer

n/a

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

Yes

No

**Don't know**

Please explain your answer

### **Supply Chains**

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

Please explain your answer

n/a

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

Yes

No

Don't know

Please explain your answer

n/a

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

Please explain your answer

n/a