

## Protecting Scotland's wildlife for the future

By E-mail:



Dear

### RE: CONSULTATION ON Scotland Rural Development Programme (SRDP) 2014–2020 Stage 1

The Scottish Wildlife Trust (SWT)<sup>1</sup> welcomes the opportunity to comment on the draft SRDP document.

The Scottish Wildlife Trust's central aim is to advance the conservation of Scotland's biodiversity for the benefit of present and future generations. We have a 25-year vision for Scotland in which we want to see a network of healthy, resilient ecosystems supporting expanding communities of native species across large areas of Scotland's land, water and seas.

We believe the way forward to protect and enhance Scotland's biodiversity and wildlife is to adopt an ecosystem approach to nature conservation and for society to recognise that healthy ecosystems are the foundation of Scotland's prosperity. The conservation of biodiversity is key to ecosystem health; without thriving biodiversity, ecosystems begin to malfunction, are less resilient to change and lose significant value. Our policy for Forestry and Woodland can viewed on the Scottish Wildlife Trusts website as can our Living Landscapes document that sets out our view on ecosystem-based conservation.

Sustainably managed farmland can provide benefits to wildlife and people as well as producing food. However, as the SWOT analysis conducted on the RDR priority list correctly identifies, in Scotland biodiversity loss continues, habitats are fragmented, there are inappropriate grazing levels, there is a lack of quality green space in the central belt and SRDP is not appropriately targeted to priorities. It is essential that we get the next SRDP "right" to address these problems.

#### General Points

We are pleased that the document makes reference to the Scottish Governments Land Use Strategy (LUS) and the concept of the ecosystems approach.

We are disappointed that the new Scottish Biodiversity Strategy (SBS), which will come online imminently, is not referenced with in the "Associated Strategies" section. Agriculture, land managers and agricultural support mechanisms have a vital role to play in helping Scotland meet its 2020 "Aichi" biodiversity targets.<sup>2</sup> It is hugely important that the SBS and LUS are mainstreamed across all government departments to allow decision makers to move towards delivering truly sustainable development.

Scottish Wildlife Trust believe the Scottish Government should aim to create maximum public benefit from public money, protecting and enhancing biodiversity will be central to this aim. Land must be managed with multifunctionality in mind and the impacts that management can have on ecosystem services and non marketable public goods, e.g. reducing the impact of extreme weather events within a catchment.

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<sup>1</sup> The Scottish Wildlife Trust's central aim is to advance the conservation of Scotland's biodiversity for the benefit of present and future generations. With over 32,000 members, several hundred of whom are actively involved in conservation activities locally, we are proud to say we are now the largest voluntary body working for all the wildlife of Scotland. The Trust owns or manages 120 wildlife reserves and campaigns at local and national levels to ensure wildlife is protected and enhanced for future generations to enjoy.

<sup>2</sup> For a full list of the targets please refer to: <http://www.cbd.int/sp/targets/>

**Question 1:** *Given the EU's Common Strategic Framework approach do you agree or disagree that EU funds in Scotland should be marshalled into three funds (paragraph 27)? Please explain your views.*

Scottish Wildlife Trust agree with the integration of SRDP funding with social and regional development funding and the marshalling of these funds into three themed funding streams. This is consistent with Scottish Government policy and should enable clear, objective and priority led allocation of funds in Scotland and a maximising of benefit from the previously separate European funds. **However, the SRDP is the key source of funding for the environment and biodiversity and it is hugely important that it is not become secondary to resource efficiency or carbon reduction.**

The environment funding stream delivers many multiple benefits and as such the Trust would like to see a significant proportion of funds directed to it, within this priority should be given to projects that deliver public benefit and not private benefit to landowners.

The Trust notes that climate change adaptation was dropped from the priority list in the Structural Funds consultation document this is extremely concerning and there should be specific mention of climate change adaptation in the SRDP priorities so that it is coherent with the Scottish Climate Change Adaptation Programme.

**Question 2:** *Do you agree or disagree with the proposed establishment of a single Programme Monitoring Committee to ensure all EU funds are targeted effectively (paragraph 29)?*

Scottish Wildlife Trust agrees with this proposal. We would also like to agree with the points made by Scottish Environment LINK in their response to this question.

**Question 3:** *Given the need to prioritise our spending in the future programme (paragraph 11) which articles do you see as a priority for use within the next programme? Please explain your views.*

Scottish Wildlife Trust does not support payment for activities that do not offer additional benefit and the tax payer should not have to subsidise actions that would of happened regardless of support e.g. payment for membership of assurance schemes.

The Scottish Wildlife Trust sees Article 29 (agri-environment-climate), as the most important article and our highest priority for investment. We consider there should be a minimum spend of 50% of the SRDP budget on article 29. This is absolutely critical to insuring that the Scottish Government meets its obligations under the Aichi targets, European Biodiversity Strategy (and the new Scottish Biodiversity Strategy), the Birds and Habitats Directives and the Water Framework Directive. It is also essential to support the delivery of ecosystem services (such as pollination) that Scottish Agriculture is reliant on.

We also see the support of advisory services (Article 16) as being very important to helping land managers make the best use of public money. Article 36 (Co-Operation) should also be supported to facilitate landscape scale, cross boundary, working. This is essential to help create coherent ecological networks and is also very important for the restoration of peatlands (a Scottish Government manifesto commitment)

With regard to article 31 (Natura & WFD) we are supportive of Scottish Environment LINKs comments:

*"For **Article 31 - Natura & WFD**, where payments could potentially enable Scottish Government to require land managers to comply with obligations under Natura and the Water Framework Directive, thought would need to be given to where/when this type of intervention is desirable and necessary. If used, the intended purpose and scope of measures under this article should be very clearly defined from the outset and should be operated closely in conjunction with Article 29. We would like to see Scottish Government explore the potential benefits of this article and where/how it might be used to generate significant land use change in order to meet the requirements of European Directives."*

Article 32 (ANC) Scottish Wildlife Trust can see merit in the ANC approach mainly because it should offer more support to HNV and extensive farming systems, however, the Trust still feels that, as with LFASS before it, ANC could still soak up a huge proportion of the SRDP budget. The Trust would like to see funding for ANC reduced and re-directed to measures such as well targeted agri-environment schemes.

**Question 4:** *Do you agree or disagree that we should geographically target our investment to areas where support will make the greatest contribution to our priorities?  
Please explain your views.*

Scottish Wildlife Trust Support better geographic targeting of investment, especially in light of budgetary cuts, as it will see better value for public money.

There is scope to develop more sophisticated and comprehensive targeting using opportunity mapping approaches and utilising a range of data sets such as those held by Scottish Wildlife Trust, RSPB and other eNGOs. The data on which geographic targeting is based however will inevitably be variable in scale, quality and completeness across priorities, and this must be acknowledged and accounted for when developing the spatial targeting approach/tool. That is, geographic targeting will only ever be as good and reliable as the data on which it is based.

Scottish Wildlife Trust would like to be kept informed of the development of geographical targeting tools and we see this as being very important in the eventual creation of a National Ecological Network for Scotland.

**Question 5:** *Do you agree or disagree that support for small local businesses should be provided through LEADER?  
Please explain your views.*

Scottish Wildlife Trust Supports Scottish Environment Links position:

*"We agree, providing that LEADER is adequately resourced (not only from SRDP but from the other European funds as well) so that funds for other more community-based projects are not disadvantaged. Scottish Environment LINK think there is an advantage here in helping to stop the distinction between farm and other rural business. The relationship and cross-over between funding small and medium/large enterprises needs to be clearly spelt out however.*

*In principle we support this proposal but, as is a common comment on LEADER, we feel it is important that LAGs seek enough wider voluntary and community help and involvement in the decision making process. This should help ensure that the decisions made are assessed more widely than on economic determinants alone. LEADER has a major role beyond economic outputs that might be addressed by other CSF funding streams and we were therefore disappointed that the outcomes of the previous stakeholder working group appeared to focus on the economic growth potential of LEADER. The group report largely ignored the well-being and place making roll LEADER has and the centrality of environmental concerns and opportunities to this. LEADER is important in bringing rural communities beyond farmers into the SRDP and it is important to emphasise that its successes can be environmental and social, providing rural cohesion and achieving national targets beyond a simplistic environmental agenda. Indeed, LEADER has been fundamental in the past for providing funding for the facilitation and coordination activity that is so necessary for landscape scale/ecosystem approaches. However, the current LEADER programme has been riddled with bureaucratic problems that threaten to undermine its ability to deliver and put people off even applying. This must be addressed in the next programme."*

**Question 6:** *Do you agree or disagree to the proposal to disband RPACs and replace with a more streamlined assessment process as explained in Section 8?  
Please explain your views.*

Scottish Wildlife Trust has no strong feeling on this issue; we would seek to keep the system as simple as possible.

**Question 7:** *Do you agree or disagree that LMOs should be removed from the future programme, given the spending restrictions we are likely to face and the need to ensure maximum value from our spending?*

*Please explain your views.*

LMOs should be removed from the programme as they are too “broad and shallow” to deliver specific biodiversity and habitat benefits given the considerable budget constraints.

**Question 8:** *Do you agree or disagree that the Forestry Challenge Funds be discontinued with WIAT being funded through Rural Priorities and F4P funding being provided via LEADER?*

If the target support for woodlands around urban areas were to move to LEADER and rural priorities it is important that worked carried out is also for biodiversity benefit and not just for recreational resource, this will also help to mitigate against the effects of climate change by reducing flood risk and the urban heat island effect.

**Question 9:** *Do you agree or disagree that Food and Drink grants be decided via the wider decision-making process for business development applications or should they remain separate and managed within the Scottish Government as is the current practice?*

*Please explain your views.*

Funding for commercial market benefits should be supported outside of the SRDP and the Trust support excluding food and drink payments from the SRDP.

**Question 10:** *Do you agree or disagree with crofting stakeholders that a Crofting Support Scheme is established in the new programme that will fund all grants relevant to crofting?*

*Please explain your views.*

Scottish Wildlife Trust Supports Scottish Environment Links position:

*“We do not have a strong view on the establishment of a crofting specific scheme/sub programme but Scottish Environment LINK see a clear problem in the existing SRDP with access to funds for crofters and small units generally.*

*If a separate approach is taken it will need to look holistically at crofting systems, and ensure support does not continue trends towards a **disconnect between the enclosed and hill land** and addresses issues such as **loss of skills and labour** in crofting areas and **good management of common grazings**. **Collaborative approaches** would need to be a key part of scheme function/delivery and we suggest this may need to be generated proactively.*

*Although not asked about it explicitly here, Scottish Environment LINK would like to raise our concerns about use of the small farmer scheme and the potential this has to exempt crofters from cross compliance requirements, and the derogation being discussed on minimum activity for small claims. Both of these issues relate to Pillar 1 but demonstrate that whilst we recognise the need to reduce administrative burden for the most marginal businesses, **we do not see reducing compliance with environmental regulation as an acceptable part of this. We do not think crofting units by dint of being crofting units alone warrant public financial support.** It is the systems operated on these units that deliver the public goods we are interested in. We think the allocation of funds to these areas without any requirements or targeting is most likely to be detrimental to the public goods value of these areas”*

**Question 11:** *If a Crofting Support Scheme is developed, do you agree or disagree that crofters (and potentially small landholders) be restricted from applying for other SRDP schemes which offer similar support?*

*Please explain your views.*

Scottish Wildlife Trust Supports Scottish Environment Links position:

*“We believe the more relevant question here would be ‘what should be in any crofting specific support scheme’. If Government gets this right, as it should be seeking to do, it negates the need for crofters to apply to both schemes, therefore making the above question redundant.*

*There are currently some options within the main RP scheme that might be considered more relevant to crofting areas such as small unit management and retention of cattle on small unit management. It would be tempting to single these options out to put together with the existing CCAGS measures and call this a crofting scheme. However, we think it is essential, in the interests of delivering on priorities for these areas, that these should not be the only options available in any crofting specific approach. Neither can these options be restricted to any crofting specific approach. Rather, any crofting specific scheme must include all relevant agri-environment options, as well as options for the simplified small units type of approach. These options will not be exclusively for, or unique to, the crofting approach, and therefore must also be available to land managers that are not crofters.*

*This may appear to be duplication but we believe the added value that might be gained in a crofting specific approach if it is developed isn’t entirely in the options that are available (although it offers the opportunity to tailor options to the crofting situation and so make them a better fit), it’s in the securing of funds to these areas, the integrated, holistic approach that can be taken and the opportunity to tailor scheme information and delivery and advisory systems to crofting specific needs, thereby increasing the likely effectiveness.”*

**Question 12:** *Do you agree or disagree on whether support for crofting should extend to small land holders of like economic status who are situated within crofting counties?  
Please explain your views.*

Scottish Wildlife Trust Supports Scottish Environment Links position:

*“As with the crofting question in general, Scottish Environment LINK have no firm view on how/where small units are dealt with but we believe there are the same access to scheme difficulties currently facing all small units as crofts, and therefore this needs to be addressed.*

*We note that small units are not restricted to the crofting counties. Should a crofting specific approach be secured then, whether or not it provides for small units within the counties, we would still wish to see provision in the main scheme for small units, by using, for example, appropriate financial thresholds to the ‘level 1’ application process – being set low enough to favour small applications.”*

**Question 13:** *Do you agree or disagree with the proposed replacement of the Skills Development Scheme with an Innovation Challenge Fund?  
Please explain your views.*

Scottish Wildlife Trust agrees with the proposed replacement of the Skills Development Scheme with an Innovation Challenge Fund. The Trust would like to see an allocation specifically for environmental projects and all schemes should be subject to “no environmental harm” screening and support public benefit projects.

**Question 14:** *Do you agree or disagree with the measures proposed by the New Entrant Panel (paragraph 92) to encourage new entrants to farming?  
Please explain your views.*

Scottish Wildlife Trust believe that the SRDP should support public benefit and business support should come through structural funds, however we do recognise that new entrants are often more innovative and responsive to environmental challenges.

**Question 15:** *Do you agree or disagree with the proposed case officer approach to the assessment of applications?  
Please explain your views.*

The Trust has worries about this approach and that “gate-keepers” have the relevant expertise, and importantly, time to make judgments about applications. There would need to be significant investment in training, recruitment and a commitment to site visits for us to support this approach.

**Question 16:** Do you agree or disagree with the proposed single entry route for applications with a two level assessment process?  
Please explain your views.

Scottish Wildlife Trust Supports Scottish Environment Links position:

*“We agree in principle with a single entry, split level assessment process. Taking our concerns about the level 1 process as outlined above as read, what will be critical is where the financial threshold between levels is set. Scottish Environment LINK are very supportive of a ‘level 1’ simplified application process primarily aimed at small applications, especially if LMOs are disbanded. We will be very concerned however if the ‘level 1’ threshold is set at too high a financial value, effectively making the level 1 process the main assessment route. We understand the Scottish Government has been undertaking work to assess what an appropriate threshold might be and we wish to see the results of this work before taking a firm view, but anticipate that a value of around £10,000 per annum will be the right level – taking in the majority of croft and small unit applications.*”

*Scottish Environment LINK is also very supportive of a regional approach to the new scheme and therefore suggest that national is the wrong level for the level 2 assessment. We would argue that people at a national level are much less likely to have the place knowledge necessary to know if the investment makes sense or not. We suggest it would be more sensible for the level 2 assessment to remain within the region.”*

**Question 17:** Do you agree or disagree with the proposed negotiation of variable intervention rates rather than setting fixed intervention rates?  
Please explain your views.

As stated above the Scottish Wildlife Trust thinks that that SRDP should be targeted towards the provision of public goods and as such we support the principle of variable intervention rates.

**Question 18:** Do you agree or disagree with the proposed setting of regional budgets across Rural Development Regulation (RDR) articles?  
Please explain your views.

The Scottish Wildlife Trust agrees with this proposal. It will make the programme more focused and strategic and help in the monitoring of the programme allowing SG to work out if the programme is delivering as intended.

**Question 19:** What support and assistance do you think applicants will need for this application process to work effectively?

The Trust thinks that a GIS based mapping and targeting tool will be essential for this process to work effectively as well as the provision of an effective, properly resourced, advisory service.

**Question 20:** Do you agree or disagree with the value of developing a descriptive map of holdings to help farmers and stakeholders understand the potential ecosystem value of specific holdings?

Scottish Wildlife Trust Supports Scottish Environment Links position:

*“We strongly agree that there is value in developing holding level descriptive maps. We believe that, if implemented in a meaningful way, this could be beneficial to land managers by making them recognise their responsibilities under cross compliance, it could help with best implementation of any greening measures that come through for Pillar 1, and it would also encourage opportunities to improve the ecosystem value and “connectivity” of their land, justifying the expenditure of public money. It would improve the holding level targeting of any new RP scheme and would hugely improve the robustness of the outlined assessment process – giving ‘gate-keepers’ and case officers an understanding of which scheme priorities apply on any given holding and so what is possible, against which to compare what has been proposed.*”

*We see this as a fundamental step forward for better environmental compliance and enhancement in accord with Scottish Government objectives. It may be appropriate to financially assist in the production of these maps, particularly in key target areas (as identified in the spatial targeting) as this would indicate to land managers that they are being encouraged to enter the scheme. Care would need to be taken to ensure that the maps remain meaningful and do not quickly reduce to the lowest common denominator, becoming just another cost to the land manager and bureaucratic process to go through.*

*We suggest, given the importance of mapping to the effective implementation of a wide range of requirements and funds across the whole of CAP and beyond, that Scottish Government set a target of having complete accessible environmental mapping of all rural Scotland by 2019. This would be consistent with achieving complete area-based Basic Farm Payments by 2019. Much of this might be done through existing and planned GIS systems and Scottish Government should continue to dedicate resources to achieve full national coverage, consistent with One Scotland, One Geography and the INSPIRE Directive, as a national and CAP priority.”*

**Question 21:** *Do you agree or disagree with the proposal to allow applicants to submit single applications which set out all investments/projects that the applicant would like to take forward on their land?*

*Please explain your views.*

The Trust agrees with this proposal as it reduces administrative burden and allows the land manager to take a strategic approach to their land management and consider the connectivity of habitats. However, this should not lead to the downgrading or exclusion of stand-alone projects that are supported by priority need – that is, integrated applications should not automatically be assumed to be ‘better’ than single objective applications. It also should not lead to the wasting of limited financial resources on non-priority actions just because they are part of an integrated application, the application should still be demonstrating fit with priorities and quality, as any other. For this approach to work, it is suggested that it will be necessary to remove inappropriate/non-priority options, without failing the whole application.

**Question 22:** *Do you agree or disagree that it would be helpful to allow third party applications for specific landscape scale projects?*

*Please explain your views.*

The Scottish Wildlife Trust strongly agrees that it would be helpful to allow third party applications for specific landscape scale projects. This is essential to allow projects such as peatland restoration or effective upland catchment management schemes to go ahead.

**Question 23:** *Do you agree or disagree with public agencies working together to identify priority areas that could benefit from a co-ordinated third party application?*

*Please explain your views.*

Scottish Wildlife Trust strongly agree that it would be beneficial for public agencies to work together to identify priority areas. It may also be appropriate to call in relevant expertise from external bodies such as the Trust.

**Question 24:** *Do you agree or disagree with the establishment of a separate fund to support collective action at the landscape scale?*

*Please explain your views.*

The Trust agrees with the establishment of a separate fund to support collective action at the landscape scale. This would be of great benefit to projects such as the Coigach – Assent Living landscape which aims to meet social economic and environmental objectives.

Historically uptake of collaborative approaches in earlier SRDPs has been low and the Trust is of the opinion that a landscape scale fund will encourage uptake and bring about a higher return for public money.

**Question 25:** *Do you agree or disagree with broadening the Whole Farm Review Scheme to include biodiversity, environment, forestry, water pollution control and waste management? Please explain your views.*

The Trust strongly agrees with broadening the scope of the Whole Farm Review Scheme to cover *biodiversity, environment, forestry, water pollution control and waste management*. This would start to take account of many of the environmental externalities produced on units and help land managers address them.

**Question 26:** *Do you agree or disagree that we allocate SRDP budget to advice provision when we move to the next programme? Please explain your views.*

Scottish Wildlife Trust Supports Scottish Environment Links position:

*“We strongly agree that increased resources be devoted from within the SRDP budget to develop advice provision and this has been a theme running through our consultation response. It is widely agreed by SRDP stakeholders, and demonstrated particularly in agri-environment literature, that good advisory services can improve the delivery of desired outcomes. Therefore investment in advisory services from the SRDP budget is an effective way of maximising value for money from the programme and making it more likely that Scottish Government targets and priorities are met. Investing in advisory services is still contributing to the rural economy, as farm advisers are generally rural-based, themselves supporting local services in the local communities in which they work. We therefore are entirely comfortable with an advisory service requiring significant investment. We suggest to Scottish Government that in the scheme of the whole programme (around £1.5 billion), £10s of millions (and the estimates we have seen are for around £20 million, we believe per annum) over the lifetime of the programme, is not at all daunting. Indeed, the annual amount spent on LFASS, with its single objective and limited proven outcomes, exceeds this by over three times but is not questioned.*

*Improved advice should also include expanded and linked online resources and a provision in local SEARS offices to support land managers who are less computer literate or have broadband connection issues.”*

**Question 27:** *What are your views on the merits of providing loans for specific purposes and/or specific sectors? Please explain your views.*

We would like to see loans for specific community benefit / biodiversity measures.

**Question 28:** *Do you agree or disagree with the proposal to maintain the current level of transfer from Direct Payments to SRDP in the new programme period? Please explain your views.*

Scottish Wildlife Trust think that that the Scottish Government should transfer the maximum possible funds (15%) from Pillar 1 to the SRDP. SRDP Pillar 2 payments offer better value for money to the public purse than Pillar 1 Direct payments.

**Question 29:** *Please tell us about any potential impacts, either positive or negative; you feel the proposals in this consultation document may have on any of the equalities characteristics listed in paragraph 136.*

Scottish Wildlife Trust Supports Scottish Environment Links position:

*“Heavy reliance on web-based targeting tools, application processes and advisory materials inevitably disadvantages land managers without either broadband access or computer skills. This must be considered and addressed in programme design and implementation.”*

**Bruce Wilson**



**Living Landscapes Policy Officer**  
**Friday, 12 October 2012**