

DRAFT RESPONSE TO CONSULTATION PAPER: PROPOSALS FOR CHANGES TO AGRI-ENVIRONMENT SCHEMES IN SCOTLAND

1. Introduction

The Cairngorms National Park Authority welcomes proposals that will improve the operation and effectiveness of the existing agri-environment schemes. In addition, however, the Authority supports the long held view of its predecessor that there should be a dedicated agri-environment scheme for the Cairngorms National Park, which builds on the unique and special qualities of the Cairngorms environment. With the recent designation of the Cairngorms National Park, there is a great opportunity to ensure that the high biodiversity and landscape value of this area is protected and maintained, and made a showcase for Scotland.

We feel that the exceptional value of the Cairngorms area is worthy of additional investment in either a new dedicated package for the National Park, or new special arrangements within the existing schemes, that will deliver environmental, economic and social benefits in line with the Scottish Executive's vision for Scottish farming as set out in 'A Forward Strategy for Scottish Agriculture'.

The findings made in a recent report commissioned by the Scottish Executive, sets out 'New Directions for Land Management Schemes in Scotland's National Parks' (2003). A key recommendation for the Cairngorms National Park is the 'development of localised environmental schemes which fill the gaps in existing agri-environment programmes.' We agree that this should be the long-term goal for the National Park.

Therefore, rather than concentrating on any substantive changes to Agri-Environment Schemes in the longer term as a result of the CAP mid-term review, we feel that making changes to existing schemes will be more effective in the meantime. It is these changes we refer to in the following response.

2. Options for Continued Support for ESA Scheme Leavers

Although the first ESA due to expire in Scotland is in May 2003, within the Cairngorms Straths ESA, this will not be till late 2004.

It should be acknowledged that different land areas have different environmental base values. It follows that funding should be targeted at maintaining/increasing conservation benefit in places of existing high environmental value, eg Cairngorms National Park, as much as in areas of lower environmental value, eg arable land in Lowlands.

Funding for agri-environment schemes in the National Park will help meet the first and second aims of the National Park (Scotland) Act 2000:

- *To conserve and enhance the natural and cultural heritage of the area.*
- *To promote sustainable use of the natural resources of the area.*
- *Which of the three options outlined do you prefer?*

We strongly favour Option 2, whereby ESA Scheme leavers, *within the National Park*, are guaranteed entry into the RSS *but only on a maintenance level*. If enhanced measures are applied for, then applicants should have to compete on a level playing field with other applicants.

- *What are your reasons for preferring the selected option?*

Option 2 is preferred as it will ensure that the 82% of farmers who entered the ESA Scheme get a head start in the discretionary entrance to the RSS, and ensure that the environmental benefits gained over the previous 10 years are not lost.

We feel that guaranteed entry into the RSS should be restricted to the level of existing work achieved under the ESA scheme thereby maintaining the current levels of funding. However if enhanced measures are applied for, then these should be considered on a competitive basis, so that the distribution of funding can be spread wider.

We feel that some improvements are needed in the RSS which will keep it on a par with the ESA Scheme, such as raising the payment ceiling (which is currently £15,000 less over 5 years than the ESA Scheme).

We also suggest that, if value for money is a requirement, then a quality Environmental Audit and Assessment in all ESA's transferring should be introduced.

Contrary to the potential disbenefits referred to in 2.10, we feel that proposals from within the National Park will deliver the greatest conservation benefit, due to the already high designation value of the area.

- *If your preference is for the third option, would you prefer the approach of awarding an agreed number of additional ranking points, or of applying a percentage increase to the ranking points earned by the application?*

Option 3 would be an acceptable second choice on the condition that sufficient points were awarded, to give ESA scheme leavers a very high chance of succeeding to the scheme.

- *Are there other options for continued support for ESA Scheme leavers you would wish the Executive to consider?*

We suggest that, before they enter the RSS, all current ESA farmers are approached with free advice from FWAG and SAC advisors as to how they can improve on their achievements.

3. Proposals for Changes to the Organic Aid Scheme (OAS)

Re 3.3: Organic production in Cairngorms is more relevant to beef and lamb and less on fruit and vegetables. We feel that the target of increasing arable and improved grassland to 30% of Scotland's organic area by 2007 is over-optimistic.

- *Do you agree that the current payment rates for organic conversion should be reviewed?*
If the Scottish Executive's aim is to encourage farmers to participate, then we do agree that a review is necessary.
- *Do you agree that it is desirable that revised rates should particularly incentivise conversion of AAPS land?*

As the greatest environmental gains will derive from conversion of AAPS land, then we agree that the revised payments should reflect this.

- *Do you agree that a new payment for conversion of land for growing fruit and vegetables should be introduced?*
We do not feel that a greater area for fruit and vegetables is relevant to the Cairngorms.
- *Do you agree that the Executive should introduce financial support for the costs of producing an organic conversion plan?*
We agree that financial support should be introduced, as this can be a large expense at the outset.
- *Do you consider that a payment of up to £300 or 50% of costs where this would be less, is a reasonable contribution to these costs?*
Yes
- *Do you agree that the Executive should introduce arrangements for conditional approval of OAS applications?*
Yes
- *Do you consider that 3 months after approval is a reasonable period within which applicants should be required to have registered with an approved sector body to prevent the lapsing of approval?*
Yes
- *Do you agree that, in order to secure the best use of finite funding the Executive should, with the help of stakeholders, seek to devise means of engaging external market-related expertise in the OAS appraisal process?*
We agree that the greater engagement of market related expertise is a good idea, but in practice may be a waste of finite funding. We believe the onus should be on the applicant to demonstrate the economic viability in terms of market processes and benefits.
- *Do you agree that the Executive should introduce payments for capital items associated with conversion to organic status?*
Although favouring payments for capital expenditure in RSS applications, we do not agree with payments for capital items for organic conversion, as organic farming is wholly commercial compared with the conservation management aims of the RSS. This will ensure that the existing low budget for agri-environment measures is not spread even thinner.
- *Do you agree that the finite assistance available should be targeted towards fencing where this is required for livestock management and to provision of hedges and dykes where these would provide biodiversity and landscape benefits?*
Not relevant
- *Do you agree that the rates of payment, and method of payment, should be the same as for RSS?*
Not relevant

- *Do you agree that, as with other agri-environment schemes, there should be a limit on the amount available per application?*
Yes
- *Do you agree that 25% is a reasonable proportion?*
We feel that 25% is insufficient, and should be 50% subject to inclusion of training/skills development through an apprenticeship scheme within the National Park.
- *Do you consider that the Executive should introduce continuing or maintenance payments for organic producers beyond the 5 year period for which OAS payments are currently available?*
We do not feel that payments should be made after 5 years, as this would indicate that the organic business concerned was not economically viable. However, should there be a more contrived production system within the National Park with environmental and socio-economic aims, then phasing payments over a 10 year period is suggested.
- *Should this be achieved by spreading existing payments over a longer period?*
Not relevant
- *Should such payments be available to all organic farmers regardless of previous participation in the OAS?*
Not relevant
- *Should continuing payments be selective in recognition of delivery of continuing environmental benefit?*
Not relevant

4. RSS: Collaborative Applications

- *Do you agree that the way the RSS operates should be changed so to promote collaborative action to enhance the impact the Scheme can make to promoting biodiversity, addressing diffuse pollution issues and securing landscape-scale visual impact?*
We agree that the idea of collaborative applications offers additional scope to maximise the environmental contribution from farmland; including fostering and promoting biodiversity; and addressing pollution issues.
- *Do you believe there should be a minimum number of farmers participating in a collaborative application?*
This question assumes that the collaborators would all have to be farmers. The Authority sees potential for farmers to collaborate with agencies, NGOs, and others; such as those abutting RSPB land at Abernethy; those on the fringe of Forest Enterprise holdings; and those covering water margins; to produce added environmental value.
- *If so, what do you think that number should be?*
Minimum of two parties
- *Do you agree that collaborative applications should be assessed locally by a relevant environmental interest to determine whether the claimed additional benefits are likely to be delivered?*

The Authority believes that the collaborative approach would best be achieved by partnerships, in which farmers, in consultation with relevant agencies and local interests, would prepare proposals for submission and approval that were endorsed and supported by all those involved.

In the Cairngorm area, there is already a Local Biodiversity Action Plan, which has been the subject of wide consultation, on which to build. The four habitat categories it encompasses are Farmlands and Grasslands; Water and Wetlands; Woodlands; and Mountains, Heathlands and Bogs; all of which are relevant, in one way or another.

There are also major pieces of supporting work such as the Forestry Framework; the comprehensive appreciation of water courses in the Cairngorms by Professor Susan Walker; the Dee and Spey Catchment Plans; and the Cairngorms Moorland Project.

Taken together, they form a network of information and opportunity in which complementary agri-environment schemes, based on collaboration amongst farmers and others, could be productively developed with ease.

- *Do you agree with the suggested ranking arrangements for the individual applications forming part of a collaborative application as outlined in paragraph 4.7?*
The proposed scoring system is far too bureaucratic and elaborate in character. The target here, as set out in the first bullet point in paragraph 1.3 of the consultation paper, is to ensure that farming is a leading player in the protection and enhancement of our environment.

It is therefore imperative that the contribution that the farmlands in the Cairngorms National Park make to the special environment of the area is maximised in ways that represent good value for money, and exemplify best practice.

The test, therefore, should be a sensible assessment of whether that target is met; and the scheme based on the assumption that those who pass that test will be admitted as of right.

We feel that, contrary to 4.7, in the event of a collaborative application failing, then individual applications should still be considered as a sole application.

- *Do you agree, in the first instance, the collaborative application approach, should apply only to applications which include management of riparian habitats or grassland for birds?*
There is enough quality information available in the Cairngorms to be able to identify particular areas where collaborative working could produce more significant results than other areas of lesser potential value.

It is the view of the Authority, therefore, that this proposal is too restrictive, and that collaborative applications in the more special areas of whatever sort should be encouraged.