Consultation Agricultural Transition (Scotland)

Response by the Landworkers Alliance

https://landworkersalliance.org.uk/

Consultation paper is available here.

Our 'Landworkers' Alliance in Scotland Manifesto for Change' can be found here.

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Baselining

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

a. Yes 0

b. No 0

c. I don't know 0

B. Please explain your answer

The Landworkers' Alliance supports baseline monitoring if it has a clear purpose and leads to more targeted use of public funds that reward lasting improvement in achieving climate change, biodiversity and social goals. However, it should be recognised that **data collection can increase administrative burdens**, especially for small farms that are more likely to already make significant contributions to biodiversity, climate change and social objectives, and **proposals should include appropriate procedures and support**.

Furthermore, it is important that **data collection contributes to improvements of farm practice, as well as continuation of good practices.** In particular, we support local rather than farm-level benchmarking, to avoid those at the forefront of the agricultural transition from being penalised for or discouraged from continuing to **set the bar high**. Establishing a baseline now should not be used to cause delays to implement the big changes to farm support that are needed for farming to achieve climate targets and protect biodiversity and foster equity.

2. Should collected data be submitted for national collation?

a. Yes 0

b. No 0

c. I don't know 0

B. If yes, what information should be collated nationally?

Data collection should relate to the overarching objectives of the regulations, which should be to **protect biodiversity and address climate change and provide for greater equity** among food producers, rural communities and consumers. Baseline data collection needs to include real physical data such as regular soil samples and lab analyses.

With regard to sequestration, for example, it should include both data on **trees** (woodland and agroforestry) as well as **soil health and soil organic carbon**. **Biodiversity** data collection has, so far, been underdeveloped and should involve data on agrobiodiversity as well as species and habitat diversity. Additionally, data should be collected to better understand the wider **social and economic** role of the farm. This includes information on land ownership, employment (FTE), training and education activities and wider public engagement.

C. Please explain your answer

Data should be collated at national level and should be publicly accessible, which means that it should be **readily available** and **easy to understand**.

The farmers and crofters being surveyed need to be **involved directly in the process**, hands on, and trained and paid to do so. Baselining should be seen as an opportunity to **reconnect SGRPID staff with farmers** face-to-face, and start the change from the current database-driven working culture, where farms are only visited for inspection and penalty assessment.

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

There is **considerable scope to improve procedures for data collection, in particular, in relation to (agro)biodiversity and soil health**, and to ensure that all data is collected and kept in a coherent way on an easily accessible forum. It should be recognised that data collection can increase **administrative burdens**, especially for small farms that are more likely to already make significant contributions to biodiversity, climate change and social objectives, and

adequate support should be provided to ensure they can meet data collection demands and that they are not discouraged from continuing their good practices.

The information presented by carbon, soil, biodiversity and social auditing should be used at government level to help set clear policy objectives and targets. At farm level, data should help prepare whole farm plans. The preparation of plans should be supported by farm advisors. Plans could identify sources of government financial support and grant aid for the activities included.

De-personalised and aggregate data that can support progress in refining sustainable farming techniques, identifying problems and increasing farmers' understanding of their animals, plants, land and wider ecosystem **should be made available for free or at cost**.

Innovations based on this data should not become the property of private monitoring companies and the intellectual property behind them should be open source.

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

Please explain your answer

To help avoid a significant increase in administrative burdens, especially for small farms, it is important that **data collection methodologies and requirements are streamlined as much as possible**. It needs to be clear to the farmer **why and how data is collected, and how it can be accessed** by the farmer when requested. Involvement of a broad range of farmers (including horticultural and small scale sectors) in the initial design of baselining activities is essential to avoid unnecessary burdens or unworkable requirements. Regular review of baseline data criteria and collection processes would give farmers the opportunity to report back on what is working well and what is not, allowing for revision from the bottom-up.

Baselining activities should be supported through education and training, information exchange and peer-to-peer learning, funded advisory services and support for whole farm planning. **All farmers should have the option to be trained to carry out the surveys themselves**, and then be paid to collect and upload the data.

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?

a. Yes 0

b. No 0

c. Don't know 0

B. If not, why not?

Reducing greenhouse gas emissions should be the objective of a legal regime on agricultural subsidies, alongside **the objectives to protect and enhance biodiversity and foster equity** among food producers, rural communities and consumers. Capital expenditure should **not be used merely for adding climate-friendly elements to high carbon-emitting farm systems**. All applicants should submit a carbon audit that shows current emissions, and a carbon budget that shows the future emission from their whole farm and the item for which grant aid is sought.

Capital funding should make clear contributions to climate, biodiversity or social goals, with **priority to be given for** items that support a transformative and **whole farm approach and multi-farm applications for the development of local infrastructures**, e.g. cooperatively owned refrigeration systems, farm machinery or processing units.

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

Please explain your answer

Match funding is an opportunity to test the commitment of the producer, but it puts up a **significant barrier for new entrant farmers or those small scale or young producers with less means** which are likely to be most in need of funding. Where funding comes with clear public benefits - for protecting and enhancing biodiversity and fostering equity among food producers, rural communities and consumers - the percentage of required match funding should be minimal or it **should be possible to make contributions 'in kind'**, for example, through a clear commitment of dedicated hours. Alternatively, an agreement to deliver clear project outcomes (e.g. for local food production or carbon sequestration) should be sufficient.

Match funding is, however, **not the only barrier** to accessing grant funding for those farmers most in need. Others that need to be addressed include:

- Administrative burdens of grant applications which impact disproportionately on already limited capacities of agroecological, small farmers (needed: provide **adequate and free support** to assist with grant applications with clear public benefits).

- Minimum 3ha eligibility requirements. **Needed: abolish threshold or otherwise lower threshold to 1ha.**
- Requirements for advance payments by farmers with reimbursement upon completion. Such grant payments in arrears are problematic as many farmers - especially small and new entrant farmers - are cautious about getting into debt or they may not be able to secure loans because they do not have the assets or properties to demonstrate security - e.g. tenant and contract farmers. **Needed: payments of grants upfront with clear reporting requirements.**
- Income cap based on total gross income for small farms grant scheme which excludes a lot of small farms. **Needed: abolish income cap on small farms grant which discriminates as no equivalent available under any other grant scheme.**
- Exclusion of dairy, poultry and pig production from small farms grant scheme. **Needed: inclusion of dairy, poultry and pig production if production is informed by ethical principles - including animal welfare - and has clear public benefits - including benefits for local food production.**
- Lack of integration of on-farm retail and food processing capital in grant schemes, which are crucial for delivering on a local food strategy. The idea of not funding investment 'beyond the farm gate' is outdated and does not reflect the fact that many farms can only survive through direct-sales to local consumers. **Needed: inclusion of on-farm food processing and retail in capital grant schemes available to all farms.**

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 to productivity or efficiency, that should improve financial returns of the business concerned?

Please explain your answer

What is meant by transformational change should be clearly reflected in the **overarching objectives of a new legal regime for agricultural and rural payments**. We believe that such a regime should aim to protect and enhance biodiversity and foster equity among food producers, rural communities and consumers. Contributing to these objectives can involve gains in productivity and efficiency - which should be understood more broadly than simple increases in yields/production to include, for example, efficiency per unit of energy/water/nutrient input. But **'transformational' change should be focused on the public benefits of farming** and grants should contribute to the financial sustainability of farmers who deliver such benefits.

Priority should be given for items that support a transformative and whole farm approach. For example, polytunnels could support a farm to diversify or expand business with fruit and vegetable production, providing benefits for agrobiodiversity, carbon sequestration through well-managed soils and employment opportunities. Other investments with significant public benefits that require grant funding include organic farm conversion capital costs, wood

planting, mob-grazing equipment, farm buildings, handling equipment, covered compost and storage areas, and bee-keeping equipment.

Clearer connections should also be made to the Scottish Government's ambitions to increase the supply of genuinely local, sustainable and nutritious food (as reflected in the ongoing consultations on a Local Food Strategy). Capital grants for rural development could help with processing equipment and buildings for packaging, storing and selling produce. Such "value adding" activities can increase the financial viability of farms, leading to them becoming less reliant on public support in the future.

It is, however, important that public money ultimately directly benefits the farmer who delivers public benefits, rather than large scale corporations which are capitalising public funds as reflected in the substantial increases in the price of farm equipment.

Biodiversity

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

a. Yes 0

b. No 0

c. Don't know 0

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

Protecting and enhancing biodiversity should be one of the key objectives of regulations on agricultural subsidies and all farmers should be incentivised to undertake actions in this regard. However, there are different ways of going about this and we advocate for a **'land-sharing'** rather than a 'land-sparing' approach. Where 'land sparing' would involve the intensification of agricultural production in some places to allow for biodiversity conservation in others (e.g. through 'rewilding'), **'land sharing' involves farming practices that also have environmental (including biodiversity) benefits.** Intensive farming, involving synthetic fertilisers and pesticides, to enable more land to be "spared" is counterproductive in terms of enhancing biodiversity associated with agricultural land. Many species have co-evolved with traditional farm management practices and their survival may only be secured through on-farm practices, rather than rewilding.

Agroecology and organic farming provide whole farm approaches that contribute to biodiversity. Whole farm approaches make sure that farms deliver public benefits in a holistic way (without one part of the farming enterprise undermining the good practices of another). **Agroecological farming and land management is place based, sustainable and deeply integrated with local ecology and environment.** It is farming with nature, but also seeks to ensure that food producers are valued and can make a decent living. Agroecology is recognised by the Food and Agriculture Organisation of the United Nations (FAO), and has been endorsed by the former UN Special Rapporteur on the Right to Food and The International Panel of Experts on Sustainable Food Systems.

Practices include - but are not limited to - ecological pest control (e.g. through intercropping), nutrient recycling and fertility building (e.g. through crop rotations), agroforestry (combining trees with arable/livestock), on-farm breeding to enhance agrobiodiversity (including rare breeds), natural productivity/quality boosting (e.g. creation of habitats for pollinators alongside managed areas).

It must be stressed that current (CAP-based) funding mechanisms have led to erosion of diversity on farms. **Area-based payments have led to land concentration, the upscaling of farming practices and specialisation in fields.** The new **CAP 2023-2027 provides for more opportunities to target environmental requirements** to local ecological realities - opportunities that the Scottish Government should take full advantage of. In this regard, there needs to be scope to have a more **fundamental debate on how we want to spend large sums of public money** to ensure that farming contributes to tackling the climate change and biodiversity crises and revitalisation of farming and rural communities. We **welcome the extension of AECS**, and support future expansion of funding for transition to and maintenance of agroecological and organic farming. However, **structural changes to the subsidy system are required that go beyond one-off, project-based grants**. Support should incentivise improvements of practices, but also the continuation of good practice.

To secure long-term and substantial impacts to tackle the biodiversity crisis, a holistic, **whole-farm and outcome-based approach, such as agroecology** is required. Demonstrating outcomes and impacts on biodiversity in complex ecosystems is not straightforward and it can take a long time to see clear improvements. Nevertheless, a short term approach must be avoided at all costs to bring about transformative change, and regulations must not be so complex to discourage more diversity of practices and enterprises on farms.

Just transition

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

Please explain your answer

A just transition demands an end to area-based payments. Agricultural basic payments have resulted in a positive feedback loop, as owning more agricultural land means more public support, means more possibilities to finance and acquire more land. Area-based payments are

supporting many businesses that do not need support or that have become reliant on subsidies. There needs to be a public debate about the fairness and usefulness of such payments.

By centering the agricultural subsidy system around **objectives like protecting biodiversity, addressing climate change and providing greater equity**, there is an opportunity to properly reward those farmers who have until now provided public goods without little financial return - and often against all the odds - and to help others make sustainable transitions. An agroecological approach would lessen reliance on industrial inputs, which not only comes with great environmental benefits, but would also empower farmers and land managers to create more efficient and profitable farm businesses through **reduced input dependency and costs**.

Moving away from area-based payments and making clear connections between agricultural subsidy reform and land reform, brings opportunities for diversification of land ownership in Scotland and diversification of the people who work the land. **Clear links should also be made with a new local food strategy**, and financial opportunities beyond subsidies could follow from better targeted and more accessible procurement which gives farmers new routes to market and favours genuinely local production. For example, schools and hospitals should be enabled to develop genuinely local menus in collaboration with local producers.

Just transition measures must also include support to adapt to environmental change. Many farmers are already experiencing the effects of variable climate leading to waterlogging and/or drought at important parts of the growing season. Support should be offered for this in terms of capital, training and research as part of a just transition.

A **JUST** system must ensure that all farmers:

- Are earning a **living wage**
- Are recognised and rewarded for **carbon sequestration**
- Are recognised and rewarded for providing **healthy food to local people**
- Are recognised and rewarded for **biodiversity protection** and habitat creation
- Are recognised and rewarded for providing **meaningful employment** in rural areas

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

A just transition means that we consider and balance all impacts of measures on a wide diversity of farmers, communities and workers and ask ourselves the question: **who ultimately benefits and who will bear the costs?** Too often - as is also evident from this question - people are grouped together through very general terms (all “farmers” and “land managers”) thereby hiding the effects on **marginalised, minority and vulnerable sub-groups**. Simply put, what is an ‘opportunity’ for a large scale, owner-occupier arable farmer in the North-East may have negative effects on a peri-urban market gardener in Glasgow or small-scale tenant

livestock farmer or crofter in the Highlands. Some groups like key migrant farm workers have been left out of debates for too long.

Use of the net zero terminology in conjunction with a 'just transition' is particularly risky. Net zero or off-setting systems come laden with more risks than benefits, including measurement uncertainties, systems gaming, driving already problematic dynamics of commodity and flex cropping, and ultimately delaying overall carbon reduction. They treat carbon mechanistically and **fail to value the holistic, systems-based approach to carbon emissions reductions that agroecology delivers.**

Key to delivering on a 'just transition' is to ensure that all voices are heard and valued in debates on regulatory reform. The transparency of policy making processes is of the essence and the Scottish authorities should provide **meaningful and equal opportunities for participation**.

A non-exhaustive list of **challenges for a just transition**:

- Area-based payments have increased concentration of land ownership and the price of land inhibiting access for new entrants: https://www.accesstoland.eu/IMG/pdf/rootsofresilience_online-light.pdf. Small farms are productive and bring many public benefits but have not received the financial support that they need: https://foodresearch.org.uk/blogs/small-farmers-must-be-included-in-new-land-use-schemes/. **Needed short-term: redistributive payments which are also now mandatory under the new CAP 2023-2027, abolishing minimum hectares requirement or lowering to 1ha, inclusion of small scale sector - notably horticulture - in ARIOB; needed long-term: overhaul of area-based payments.**
- Many farmers are 'locked' in the current large-scale, intensive production system due to high investment/loans and reliance on area-based subsidies. **Needed: adequate support and training to give farmers opportunities to transition to more ecologically and socially sound farming systems, through on-farm diversification or transfer to new entrants. It is important that we don't lose farmers, destroy livelihoods, and lose our food production capacity. Government support for grants and training programmes to support transitions are essential.**
- Natural capital payments favour large scale land ownership and have disproportionate impacts on more vulnerable groups like tenant farmers, whose livelihoods are at risk as landlords are tempted by carbon prices and market opportunities. **Needed: effective scrutiny and regulations of carbon credits and offsetting schemes.**
- Post-Brexit workforce requirements and risks of exploitation of seasonal workers that follow from temporary migration programmes. Contrary to agroecological farms which often provide opportunities for year-round employment, the short-term nature of harvest seasons in intensive systems (e.g. for fruit and vegetables) have put emphasis on temporary contracts for seasonal workers which provide inadequate protection against labour abuse: https://www.labourexploitation.org/news/new-report-highlights-risks-human-trafficking-uk-

seasonal-workers-pilot. **Needed: introduction of 'social conditionality' requirements for agricultural payments similar to new CAP 2023-2027; inclusion of migrant labour representatives in all relevant fora.**

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

Policies to incentivise sequestration through tree planting, enhancement of soil health, creation of wetlands and restoration of peatlands are crucial for meeting climate change targets, but the specifics of chosen instruments are just as important to ensure other objectives (biodiversity/social equity/just transition) are not undermined.

Many 'land sparing' solutions to climate change argue that, to balance environmental preservation with food production, it is necessary to sustainably intensify production on the most fertile lands while setting aside other areas of land as natural reserves to sequester carbon. This ignores the fact that **food produced through the industrial farming model and distributed through global supply chains, drives climate change**. **Supply chain emissions** relate to transport, packaging, refrigeration and waste. Additionally, intensification of production also undermines other objectives of agricultural and rural policy, through increased pollution and pesticide damage and the loss of farmers and their skills.

We believe instead that there must be support for the adoption of agricultural practices that **enhance the underlying fertility and sequestration capacity of soils**, **as well as above and belowground biodiversity and environmental quality,** without sacrificing productivity. When managed in a way that promotes soil health and biodiverse plant growth, agricultural lands have the capacity to sequester CO_2 from the atmosphere. **A focus on genuinely local supply chains** will further reduce emissions, through reduced food-miles, packaging, refrigeration and waste (see also Q19).

Agroforestry provides a good example of how carbon sequestration can be improved without removing land from agricultural production. The incorporation of trees into agricultural systems through forestry, silvopasture and agroforestry can provide the additional benefits of shade and water retention, while allowing production of crops such as fruits, as well as timber, linking forestry and farming industries. **Other agroecological practices** such as intercropping and organic husbandry can improve soil quality and aid carbon sequestration, whilst lessening demand for off-farm inputs that directly and indirectly contribute to emissions through transport, production and use. **Support should incentivise improvement of practices but also the continuation of good practice.**

Of real concern is the renewed focus on carbon markets to deliver on the achievement of climate targets. Farmers and crofters are under increasing pressure to sell carbon rights and the Land Commission has urged for caution whilst it seeks to better understand impacts of natural capital in the carbon trading systems. Carbon offsetting schemes are susceptible to abuse and do not incentivise the adoption of holistic and permanent solutions such as agroecological approaches. They are driving up land values and concentration of land ownership and power, impacting on the development of more resilient local food systems and reducing tenancy supply. The carbon markets and offsetting schemes are acting against the objectives of the Scottish Government and Scottish Land Commission in terms of land reform in Scotland, and fail to achieve actual emissions reductions. Urgent action is required to minimise the long-term negative impacts that these schemes are currently creating. **We need:**

- Monitoring of the impacts of carbon markets on agricultural tenancies and land use change by the Scottish Land Commission.
- A moratorium on carbon offsetting schemes in Scotland while awaiting firm regulatory scrutiny.
- An institutional body to monitor land sales in Scotland (comparable to the French Land Agencies - SAFERs - which imposes a public interest test on large scale land transfers).

<u>Productivity</u>

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

Please explain your answer

We believe that the agricultural subsidy regime should be driven by the objectives to protect and enhance biodiversity, address climate change and foster social equity for food producers, rural communities and consumers. It is, however, important that public support improves the financial viability of farms that are delivering public goods.

A narrow understanding of productivity - understood as output per unit of labour - has not been a helpful criterion to measure transformative change. For example, increasing yields for animal feed or alcohol production, or for bulk commodities for export through invasive and harmful methods is not a sustainable model. **A holistic understanding of efficiency and productivity supported by agroecology, which focuses on the questions 'what is produced, for who and how?'** is much more helpful in targeting agricultural production towards the nutritional needs of local communities in line with Scottish ambitions to produce more local food.

In this regard, **whole farm plans that target flock/herd, soil and crop health through agroecological practices,** for example, better farm hygiene, animal welfare standards, nutrient recycling and/or intercropping, will demonstrate real improvements in productivity over time.

Such farm plans should be encouraged as a first but important step in delivering change. They are needed to help farmers and crofters transition to agroecological farming models. **Providing financial support and advice to farmers to help them produce plans is justified.**

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

a. Yes 0

b. No 0

c. Don't know 0

B. If so, how would this be measured?

Future agricultural support should aim to **protect and enhance biodiversity, address climate change and foster social equity** for food producers, rural communities and consumers. Ensuring the financial viability of farms that deliver important public goods - ensuring that those farmers can earn a decent living - should, however, be part of a more equitable and just system.

Historic systems for EU agricultural subsidies have shown how a focus on a narrow understanding of productivity can lead to perverse incentives and overproduction. Scotland should use the opportunity of drafting a new Agricultural Bill to take lessons from the past and have a comprehensive debate on the objectives of our agricultural and food system.

However, **a holistic understanding of efficiency and productivity which focuses on the questions 'what is produced, for who and how?'** can be helpful in targeting agricultural support towards those farmers that adopt agroecological practices and provide a broad range of public benefits, including the production of nutritious, sustainable and genuinely local food.

<u>Research & Development</u>

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?

a. Yes 0

b. No 0

c. Don't know 0

B. If yes, please specify

In order to target research activities to the requirements of a future subsidy regime it needs to be clear first what the overarching objectives are.

Academic research has often been **too narrow in scope and fails to take lessons from the field**. The current Scottish research strategy 2022-2027 falls short on supporting transformative change and the upscaling of agroecological and organic approaches.

DEFRA has announced a farmer-led R&D programme which could address some of the shortcomings in connecting research to policy objectives and the lived experiences of farmers. Agroecological farming is **knowledge intensive and requires a holistic approach to research**, across disciplines and academic and practical spaces. It requires research beyond a more narrow and sectoral focus on technological innovation and development.

We want to see significant R&D investment into knowledge and technologies that are affordable and can be widely implemented, that benefit farmers rather than big agricultural businesses providing inputs. Innovation resulting from research does not necessarily have to mean hi-tech, capital intensive interventions, but can include application of traditional skills and knowledge in innovative ways, or adapting traditional husbandry according to insights gained from either farmer to farmer innovation or academic research. Topics include composting technologies, heritage seeds, on-farm and food waste-based animal feeds, horticultural and low emissions equipment, all of which minimise the use of external inputs and thus contribute to climate change targets.

Government-led R&D also needs to be more accessible for practitioners like farmers. R&D programmes and application processes can be very difficult to navigate, especially for those from outside the academic community and those working under restricted capacities. **Better support** for organisations like the LWA to guide practitioners through the systems and processes **is essential to ensure that research has more practical impact**.

Knowledge & Skills

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

Please explain your answer

Knowledge exchange and skills development are key to sustainable agroecological systems. Our members believe that peer-to-peer learning through, for example, farm visits, networking groups and online training are most important to help farmers build or develop their skill sets. **Funding is required for training in agroecological farming**, including accredited training for existing farmers and traineeships and apprenticeships for new entrants.

But efforts should go beyond business training targeted at current or new entrant farmers. Food and agricultural training and **education** are intrinsically linked. Giving children and young adults

the skills necessary to grow, choose and prepare nutritious food provides benefits related to physical and mental wellbeing, and also provides foundations for the creation of a new, diverse generation of conscious farmers, crofters, growers and foresters. **Increasing the visibility and accessibility** of the food and agricultural sector, especially with regard to young people who may lack exposure, **is crucial to increase diversity in land-based work.**

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

Please explain your answer

Action should not only target current and new entrant farmers, but should also make sure that there will be a next generation of farmers, crofters, growers and foresters which is keen to grow nutritious food for people whilst also helping to protect and enhance biodiversity, address climate change and foster equity.

Targeted government action can include:

- Support farmer-led, **peer-to-peer learning programmes and networks** for agroecological knowledge exchange.
- Include **farmer-trainers and educators in the current review of land-based education**.
- **Reform farm advisory services** to better support agroecological farmers, crofters, growers and foresters in Scotland.
- Provide **funding** to cover salary and NI payments for **interns/trainees** employed by small and medium scale agroecological farmers, crofters, growers and foresters.
- **Create a National 5 and Higher qualification in organic/agroecological food**, farming and forestry in every school.
- Support the creation of a **funded degree course** in local and agroecological food.
- **Recognise and strengthen the diversity of our farm workforce** by providing more support to women and all gender identities, and monitoring ethnicity of the farming population in the Scottish Agricultural Census.
- **Appoint diversity champions** to challenge perceptions of who farmers, crofters, growers and foresters are.
- Support a **school recruitment programme** including an "Agroecology and Land Based Careers Fair" initiative, to enable secondary school students to meet and talk with farmers, growers and foresters, and gain access to land based work experience.

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

a. Yes 0

b. No 0

c. Don't know 0

Please explain your answer

Mandatory training is a problematic proposal as **Scotland is currently lacking adequate facilities for holistic agroecological learning and could put an additional burden on already limited capacities of small scale farmers.** Where we emphasise the value of peer-to-peer and context-based learning, professional training can also come with risks of oversimplification and generalisation whilst failing to target local ecological realities.

A 'carrot rather than stick approach' which gives farmers incentives (as well as the space and time) for continuous development of knowledge and skills, and a focus on farmer-led, land-based training, is required.

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

Reducing emissions and increasing biodiversity needs to be supported across the supply chain, not just at the producer stage. In many instances, supply chains are responsible for comparable emissions to production itself. **In order to address this, and assure the green credentials of Scotland's produce, supply chains must be short and transparent.** The climate importance of local food is often underestimated because transport emissions are the only metric used to measure this. However, local sales also tend to involve significantly less processing, packaging, refrigeration and waste. In addition, shorter supply chains can ensure standards of production are high in terms of other factors such as conditions for workers and animal welfare. **Research has shown, for example, that £1 spent by customers on veg box schemes or farmers' markets, a further £3.70 is generated in social, economic and environmental value:** https://www.nefconsulting.com/growing-communities-evaluation/. In genuinely localised food systems, **assurance follows from direct or close relations between producer and consumer.**

Supporting the development of short, local supply chains and making local food accessible to the people of Scotland will help to ensure environmental measures taken in Scotland are not undercut by lower standard imports. This can help to improve food sovereignty (a concept now recognised by the United Nations Declaration on the Rights of Peasants and Other People Working in Rural Areas) in Scotland, while ensuring we are not

exporting emissions overseas or leading to detrimental land changes, such as deforestation, in other countries.

It is essential that agricultural reform in Scotland is clearly linked to a new Scottish Local Food Strategy. Local food must not be treated as a niche luxury product, available only to the affluent. Everyone in Scotland should be supported to eat well and to be able to pay the true price of healthy, locally produced food.

There is a need for solid and direct investment into the key infrastructure required for short, local supply chains. This could include development of local and mobile abattoirs, appropriately sized facilities for cold storage and packaging, drying and processing food at a local level, and support for distribution hubs and farmers markets. Additionally, **policy changes will be required** to ensure that legal requirements (e.g. around food safety or hygiene) do not disproportionately impact on small low-risk businesses. Our members have also noted the need for support with facilitating agreements between local producers and retailers, as well as professional support for the formation and management of producers' cooperatives for supplying local markets.

The public sector needs to take the lead in supporting local supply chains, and ensuring the green credentials of the food served within Scotland's public institutions. **Public procurement has the potential to increase the value received by farmers by providing secure markets without reliance on exports, as well as creating additional incentives to increase environmental production standards.** This requires significant changes to public procurement policy in order to support supply from smaller scale farmers. Currently public procurement is done at such a large scale that it excludes many local food producers. In Bath and North East Somerset in England, "Dynamic Procurement" is being piloted as a way to increase access to public procurement for smaller suppliers, through greater flexibility of supply: https://equilibrium-markets.com/banes-pilot.html. We have members who produce healthy, sustainable local food who are very keen to supply the public sector, but have been unable to do so due to the scale at which public procurement takes place. Local authorities must be given the resources required to allow them to value quality over cost, and to purchase truly local food.

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

a. Yes 0

b. No 0

c. Don't know 0

Please explain your answer

It needs to be clearer what is meant by farm assurance in this instance and whether they would set the bar higher than compliance with baseline regulation (minimum standards),

and be comprehensive in scope covering e.g. environmental and social requirements. Also, assurance schemes would have to allow for actions that are specifically targeted at local, ecological and economic circumstances including environmental conditions, to support agroecological farming and transitions. They would have to be easily accessible and not put additional burdens on already limited capacities.

Making farm assurance a mandatory requirement for future support does not appear to be the best way to make transformative progress. However, using some schemes that go beyond minimum requirements like the **organic certification schemes to help define conditionality criteria or enable access to additional public support, could help lessen bureaucracy for sustainability-related payments**. The uptake of such schemes should be better supported by reducing the bureaucracy and costs associated with third-party certification.

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

Please explain your answer

See Q1-4.