

**RURAL ECONOMY AND CONNECTIVITY COMMITTEE
SUBMISSION FROM SCOTTISH LAND AND ESTATES
THE DRAFT CLIMATE CHANGE PLAN (RPP3)**

Scottish Land & Estates is a member organisation that uniquely represents the interests of both land managers and land-based businesses in rural Scotland. Scottish Land & Estates has members with interests in a great variety of land and rural property uses and we recognise the vital role land-based businesses play in terms of climate change mitigation. We very much see these businesses as part of the solution. As such we welcome the opportunity to provide a submission to the Scottish Parliament on this matter.

The overarching remit of the review is—

“To consider the draft Climate Change Plan (third Report on Proposals and Policies-RPP3) and the effectiveness of this in meeting the emissions reduction targets”.

With emphasis on the following questions –

- *progress to date in cutting emissions within the sector/sectors of interest and implementing the proposals and policies set out in the RPP2;*
- *the scale of reductions proposed within their sector/s and appropriateness and effectiveness of the proposals and policies within the draft RPP3 for meeting the annual emissions targets and contributing towards the 2020 and 2050 targets;*
- *the appropriateness of the timescales over which the proposals and policies within the draft RPP3 are expected to take effect*
- *the extent to which the proposals and policies reflect considerations about behaviour change and opportunities to secure wider benefits (e.g. environmental, financial and health) from specific interventions in particular sectors.*

For each of the areas within the Plan we have therefore set out our thoughts with the above questions in mind.

Part One

Sections 1 – 6

Since these sections set out the background, context and approaches taken in putting together this third Plan, we provide some general thoughts covering all of them rather than going through them section by section.

Within this part of the Plan we welcome that an overarching approach which is about enabling and facilitating behaviour change is set out. It is particularly important to realise that particular behaviours are prevalent across society, and that change requires us to consciously alter these behaviours. Social and attitudinal change takes time and requires investment in information, advice and incentives. While we would not deny there is also a role for regulation, this should be a backstop measure used only when the “positive” levers are not effective.

We particularly welcome that a collaborative approach is highlighted at Section 3. We feel it is vital that the public, private and third sectors work together to effect change.

We are also pleased to see that the planning system has been dealt with in these overarching sections, at 5.2, as it is undoubtedly relevant to effecting behaviour change in many of the subsequent sections. The general emphasis on greater consultation / further dissemination of guidance in relation to new measures that will combat climate change is welcome. In terms of 5.2.5, in a rural context both public transport and private cars are essential. For instance, members have told us “small bus services are always welcome, particularly for the elderly, and car transport is essential on our estate.” The long-term focus should be on transition to hybrid and electric cars rather than restricting use of cars. We would therefore suggest that bullet at 5.2.5 relating to travel should read: “*where possible* travel opportunities should prioritise walking and cycling before public transport and cars“. Other relevant planning issues have been included under their appropriate sections.

Section 6 deals with Monitoring and Evaluation. Our only point here, is that while we of course understand the need for monitoring and evaluation, we would urge that it remains proportionate.

Our final general comment relates to the sectoral approach that has been taken to the development of the draft Plan and the obvious omission of the Land Use Strategy. Given that the Land Use Strategy was developed as a requirement of the Climate Change (S) Act 2009 from recognition of the inter-related nature of the natural environment and modified environments such as farming and forestry, it is surprising that it is not a central part of the Plan. Sectoral approaches were valid in the past when our focus for natural resources was on their economic worth, but as

we have come to realise that we must view natural resources differently and use them in ways which do not deplete our base stock, so our focus needs to shift to look at land and its use as an interconnected, holistic system.

The Land Use Strategy approach enables us to do this. It gives us the opportunity to identify all the things we wish to see the land deliver from market goods such as food and timber, through to public goods such as natural flood management, climate mitigation and improved biodiversity and services such as pollination and water purification. It then allows us to develop processes that enable decision-making about the best way to deliver as much as we can within the natural constraints we have, and to make rational choices where it is not possible to deliver everything. Crucially it is a route to deal with some of the sectoral conflicts which will be inherent in trying to do everything this Plan sets out. We therefore feel that before the Plan is finalised, the Land Use Strategy needs to be embedded within it.

Part Two

Sections 7-14

Section 7 – Electricity: the electricity sector covers the generation and wider electricity system for Scotland.

7.3 Scottish Land & Estates welcomes the aim of policy outcome 1; Scotland's electricity grid intensity is below 50g CO₂ per kilowatt hour, aided by enhanced flexibility mechanisms and powered by a high penetration of renewables, using a range of technologies including onshore wind, offshore wind, hydro, solar, marine and bioenergy. We agree that the closure of Longannet in 2016 will significantly reduce the 2014 figure which stands at 196g CO₂ per kWh.

We also welcome the aims of policy outcome 2; by 2030, emissions from electricity generation are negative, providing a net reduction in energy system emissions. In completing this outcome, the Scottish Government has highlighted the necessity for commercial scale demonstration of Carbon Capture Storage (CCS). Given the high costs of large scale CCS plant development, focus should be directed toward small and medium scale operations such as distilleries and CHP schemes.

Broadly speaking, we welcome the ambitious aims and support the actions for delivery. However, we would suggest that there are still questions as to how achievable the targets are. Given that electricity is a UK-wide grid, deliverability of Scottish aims is somewhat tied to UK policy which is currently targeting 100g CO₂ Per kWh for the same period.

These issues are explored further in the Scottish Energy Strategy Consultation.

Section 8 Residential (*For consideration by the Local Government and Communities Committee (housing) and Economy, Jobs and Fair Work Committee (reducing energy demand, renewable heat, fuel poverty)*)

Clarity is needed on whether the policy objective is to reduce emissions or to reduce fuel poverty. This will help to target the policies.

8.2.1 We welcome the appreciation that improvements are limited by technical feasibility but would also encourage the addition of financial viability. It is technically feasible to improve the energy efficiency of almost every property but this must be balanced against the cost of the work required to do so.

8.2.2. We welcome the additional jobs that the policies will likely bring but there must be steady policy application to allow the sector to plan for the long term and secure staff with relevant knowledge and expertise, and expand their businesses accordingly. In the past we have had successive policies requiring different accreditation or training, which has impacted on continuity and cost.

We suggest removing reference to external wall insulation improving appearance. While a new render will temporarily clean up the appearance of buildings there is a much greater and long term risk to the appearance of building due to external wall insulation. In older buildings particularly, policy makers and property owners must be cautious not to lose the architectural and heritage value of the building.

8.2.3 The target for 80% of homes to be heated by low carbon technologies is very ambitious and does not sit comfortably with the current efficiency and cost of gas. Nor does it realistically consider that 79% existing stock is currently on gas. Electricity is noted as being low carbon but current practice is to replace electric heating (high costs, low efficiency) with gas. Such a dramatic shift in policy will need to be carefully managed and well funded. In some rural areas there is a large amount of renewable energy being generated but no incentive for this to be used in local houses. Making it easy for generators to sell directly to the public, using the existing network, would assist the rural sector.

8.2.3 We support the ambitious wall insulation targets but must be wary of hitting targets in the easiest way possible which will ignore the majority of rural properties. Rural properties are more commonly older stock, traditionally built, in private ownership, detached, off the gas grid, and exposed to elements resulting in them being more expensive and technically more challenging to improve. It is easy and

cheaper to deliver wall insulation in a modern, flatted, urban setting where all the properties are owned by the Local Authority or RSL. Schemes often focus on cost effectiveness as a priority so rural areas are often not targeted, or schemes are not delivered effectively.

8.3 There is no mention of lobbying to reintroduce Landlord Energy Savings Allowance (LESA) at UK level. We believe this initiative worked well to incentivise landlords to carry out energy efficiency works and would support its reintroduction.

8.3 We have some concern that Regulation of Energy Efficiency in the Private Sector (REEPS) is not listed as a policy commitment and is instead noted under co-benefits in relation to rented sector. Perhaps this is because policy has not yet been consulted upon but it is only slightly behind the SEEPS consultation. There is no mention of regulation of energy efficiency for homeowners and query if it is hoped homeowners improve their energy efficiency through incentivisation without regulation. The best time to improve energy efficiency is during renovation however there is very little information to guide home owners or tradesmen towards selecting the best option for a particular type of building, in a specific situation. It is a highly complex subject, which can prove costly if it is done wrong. Good work has already been done but more is needed to find the most cost effective solution, which can gain widespread acceptance. Thereafter it is important that everyone is aware of what best to do, otherwise houses will continue to be unwisely renovated.

General

Fuel poverty is mentioned a number of times. A new definition of fuel poverty is required and we understand this will be considered later in the year. An improved definition would make it easier to target those most in need and ensure low cost measures are being undertaken before awarding wide-scale public funding. Support in switching suppliers to reduce bills and a better understanding of heating controls would be hugely effective and low cost.

Caution is required when retrofitting buildings as there can be unintentional adverse effects. Energy efficiency improvements must be appropriate to the property. There is a danger that targets are met but the measures have been inappropriate resulting in damp, rot, poor air quality, and health issues for occupants. Benefits of a warmer home and insulation are recognised in the document but without noting the importance of a whole house approach including ventilation there is a risk that health could actually be at risk. Traditional rural homes were designed to have unrestricted ventilation which is good at removing moisture, but makes them cold and draughty. Fitting central heating has occurred in most properties but this is clearly inefficient in houses that have a free-drawing open fire, and a free flow of air

between floor boards, around skirtings, pipes, and ill-fitting window frames. To improve on this, information needs to be produced and promoted on reducing uncontrolled ventilation, and on fitting and using controllable ventilation systems. Home owners need to be informed of how best to manage their traditional home to restrict the internal humidity to safe levels. This could be as easy as encouraging window opening, extraction units and direct heating, ideally backed up with simple humidity displays. There needs to be a better understanding that if you live in a house that has little restriction on ventilation it is a waste of energy to try to keep the air temperature high, other solutions will be cheaper and more effective.

No-one wants a stuffy, damp house but issues can be caused by occupants trying to keep the air temperature up, and not being able to afford solutions to remove moisture from cooking, drying clothes and general living. Supporting solutions to these issues would greatly assist.

There is reference throughout the document to the role that SEEP will play in both a residential and commercial property context. Where housing is concerned it seems that the emphasis will be almost exclusively on existing property although we do welcome the review of building standards to support policy outcome 1.

In relation to this the statements in Tables 8-10 (on page 61) and 10-10 (page 103) refer to building regulations for new housing and commercial buildings that the deployment of low carbon solutions in construction “show poorer cost/benefit as performance sought is more challenging”. Not only is there no evidence presented in the Plan to support these statements but no reference to the November 2013 Update of the Sullivan Report which outlined a series of steps towards low carbon buildings and which the Minister at the time, Derek Mackay, endorsed.

We would urge that the achievements made in the residential sector should be measured on the outcomes rather than on the total amount of funding spent or the number of measures installed. There needs to be close monitoring of the impacts especially in terms of impact on quality of life.

The final point we would make is in relation to the continuing issues regarding the application of the methodology used to produce EPCs in a rural context. We have examples where renovations have taken place which through what amounts to a rebuilding of a house, a property of almost Passivhaus standards has been created within the shell of the ordinal traditional stone building. However EPC rating is calculated as if the energy inefficient characteristics of the stone construction persisted.

Section 9 – Transport: the transport sector covers all transport modes in Scotland, including public transport, freight, aviation, shipping, private motoring, active travel and the regulations, policies and infrastructure designed to support all of these.

9.3 We welcome the aim to lower average emissions per kilometre of new cars and vans to reduce in line with current and future EU/UK vehicle emission standards, and the proportion of ultra-low emission new cars and vans registered in Scotland annually to reach or exceed 40% by 2032. We welcome the focus on increasing the level of ultra-low emissions vehicles, which relates to the point we make under section 5.2.5 regarding travel.

In terms of achieving this outcome, we welcome the consideration of proposals to provide EV charge points/wiring in new residential and commercial developments and a commitment to investigate how such measures could potentially be trialled consider developing guidance on charge point provision to support planning authorities.

9.3.4 Similarly, the aim to have the proportion of the Scottish bus fleet which are low emission vehicles has increased by 50% by 2032 is welcome and fits with the vision relating section 5.2.5 regarding travel.

In addition to the points above, we believe that consideration should be given to developing an ‘uber like’ transport service that uses IT to make the most of car journeys in rural areas. For example, the local authority (or other operator) could run an ultra-low carbon car-sharing service on a route which customers could apply to use via an app. The running costs could be met by the passengers and these cars could be given incentives including ability to use bus lanes, free parking etc. They would fill the gap where bus services would not be financially viable in remote rural areas.

We broadly support the aims of reducing emissions at ports, airports, ferries, road freight, electrification of railways and increasing active travel. However, we note that rail is already relatively energy efficient and we would suggest that instead of focussing on electrification of the whole system, there should first be emphasis on dualling Highland routes where possible to improve access to remote rural areas.

We also note that increasing electricity generation via renewables alone is a position that will come under increasing pressure with the full electrification of the railway, cars and buses etc. Therefore, we believe it is important that a mix of renewable and low-carbon electricity generation is essential.

Section 10 – Services: covers all non-domestic buildings in the public and commercial sectors.

In relation to sections 10 and 11, we welcome recognition that “there is much further to go for renewable heat uptake.”

10.2.1 We welcome the appreciation that improvements to energy efficiency and heating are subject to technical feasibility and practicality but would also encourage the addition of financial viability. It might be technically feasible to improve the energy efficiency of almost every property but this must be balanced against the cost of the work required to do so.

10.3 We welcome policy outcomes 1 & 2 which seek improvements to the fabric of Scotland’s non-domestic buildings resulting in a 10% reduction in their heat demand by 2032 and to have 94% of non-domestic buildings’ heat is supplied using low carbon heat technologies over the same period. But given that the dataset available does not constitute a complete dataset on energy performance of non-domestic buildings (10.1.3), we would urge a degree of flexibility be built into these aims.

We welcome acknowledgement of the role of Renewable Heat Incentive (RHI) scheme in enabling uptake of renewable technologies. However, there are concerns of diminishing interest in the scheme due to RHI degression (not applicable to heat pumps), which could be exacerbated by the impact of Brexit on the price of oil.

As there is no guarantee of RHI funding post 2020/21, we welcome the Scottish Government’s commitment to considering what sort of funding mechanisms are needed into the 2020s and 2030s to enable continued take-up of these technologies by business through Scottish Energy Efficiency Programme (SEEP).

The District Heating Loan Fund had a budget of £5 million last year (+£2m added late on) and it has funded 41 projects in 4 years – We therefore believe that the scheme will need increased funding if it is to make a significant contribution to meeting these ambitious targets/outcomes. Also, as RHI becomes less attractive through degression, uptake of the DHL is likely to be affected negatively. The Low Carbon Infrastructure Transition Programme is only funded until 2018. Offering smart metres is welcome but perhaps it should be compulsory for energy companies to provide at their own cost.

In terms of developing and identifying the best approach to the long-term decarbonisation of the heat supply, to commence after 2025 (detail in Table 10-7) we have concerns over the costs, timing and commitment from the UK government involved in repurposing of the gas network.

Section 11 – Industry: this sector includes all industrial activity and manufacturing in Scotland, including the energy-intensive industrial sectors covered by the EU Emissions Trading System.

11.3 We welcome the target for industrial emissions to fall by around 19% between 2014 and 2032, and technologies critical to further industrial emissions reduction (such as CCS etc.) are demonstrated at commercial scale by 2030.

We agree that providing incentives and business support via SG manufacturing action plan (MAP), A Manufacturing Future for Scotland, and Scotland's Energy Efficiency Programme (SEEP) will help achieve this. These programmes use a combination of existing support from the Scottish Government, Scottish Enterprise, HIE, and will develop new financial products for industry to invest in energy efficiency and decarbonisation through approaches such as industrial heat recovery to district heating networks, which is welcome.

Large scale use of CCS technology is associated with high costs which are difficult to meet. As such we would like to see a focus on small-medium scale development as described in Section 7.

Further detail of heat & energy efficiency strategy, and district heat regulation to be analysed in relevant consultation (closes 18 April).

Section 12 – Waste (for consideration primarily by the Environment, Climate Change and Land Reform Committee)

We are particularly pleased to see action to reduce food waste. It is vital that supply chain issues are addressed that currently result in good, nutritious food from Scottish farms being ploughed back into the ground because they do not conform to a superficial shape or standard.

In terms of the proposed policy: Ending landfilling and biodegradable municipal waste by 2020 and reducing all waste sent to landfill by 5% by 2025, we welcome that the Scottish Government will work, with SEPA and Zero Waste Scotland, to continue to improve the way that it provides and presents information on the anticipated capacity requirements for future alternative waste infrastructure, for use by planning authorities and industry. This will help to ensure that the capacity of waste infrastructure developed is appropriate.

Section 13 – Land Use, Land Use Change and Forestry (LULUCF)

As the draft Plan rightly identifies, LULUCF has the ability to show negative emissions, that is, it can sequester more atmospheric carbon than it emits. We recognise, as a result, that those that manage land have a vital role to play in ensuring Scotland meets its long-term climate ambitions.

13.3 Forestry (for consideration primarily by the Rural Economy and Connectivity Committee)

Many of our members own and manage forestry, both commercially and for amenity purposes. In light of Scotland's greenhouse gas emissions reduction targets and other economic and environmental goals, we can understand the desire for woodland expansion and indeed many of our members are supportive of it. We would make the following points, however:-

- There is an impression given in the draft Plan of forestry being able to deliver multiple outputs in all locations. This is not necessarily reflected in practice, so for example, a Scots Pine plantation will deliver benefits in terms of habitat and species diversity whereas a plantation of Sitka spruce will do more for carbon sequestration. The right species mixes and the ethos of “the right tree in the right place” are important therefore.
- To achieve the woodland expansion targets set out in the draft Plan, it will be important to push on with the McKinnon recommendations and to keep the issues identified in the McKinnon Report under review. This is not currently identified in the draft Plan.
- It will be important to ensure adequate funding, either from the public or private sector, is in place to achieve these ambitious targets. The Plan already deals with this. In addition to the mechanisms identified which we fully support, as we also identify in the Peatland section below, there are opportunities through Natural Capital Accounting approaches to see more money from the private sector invested in carbon sequestering activity. This progresses Woodland Carbon Code thinking to some extent and we believe it should be explored more fully.
- It will also be important to avoid sectoral conflicts as new ground is identified for trees. These planting targets will make those undertaking other land uses such as upland farming nervous of the impact on their business. As we have said earlier in this submission, we would wish to see the Land Use Strategy approach taken forward, in a way that ensures decisions are made in a rounded and inclusive way that fully recognises the trade-offs required when land use changes are proposed.
- We are pleased to see awareness raising identified as a contributing policy. It is very important to win hearts and minds rather than simply rely on funding and regulation – important though both are in their own ways.
- Although this Plan is about climate change mitigation and not adaptation, there is a need to think about the ambitions the Plan has for forestry in light of

tree health issues. Climate change is one of the factors that is likely to increase the risk of new tree diseases to Scotland and may be a significant risk factor to achieving sequestration through forestry.

- We are of course supportive of proposals to promote sustainable timber and wood fibre products to downstream industries. We would add that there is a strong need to publicise to (builders, designers, architects) the real potential of timber and indeed the necessity of using more timber in house building. Despite a lot of work being done there remains a lack of architects and builders using wood to a full range of its potential. This may be because of concerns over consistent timber quality from Scottish woods.

Additionally, in terms of planning issues for forestry and woodland, the draft Plan identifies the Scottish Government will support planning authorities in the development and revision of local forestry and woodland strategies, which will indicate preferred and potential areas appropriate for woodland creation. (prepared by planning authorities with support from the Forestry Commission Scotland). We would suggest that, in line with the proposals set out in People, Places and Planning consultation to frontload the planning system, there is a case for considering community involvement in developing local forestry and woodland strategies. Giving the community a role in the process early on would help mitigate reactive objections / complaints about the state / use of local woodland and forests.

13.4 Peat (for consideration primarily by the Environment, Climate Change and Land Reform Committee)

The ambition stated at the head of section 13.4 “Peat” is good and completely supportable. The members of Scottish Land & Estates increasingly understand the now recognised need for peatland restoration and are on the whole willing partners in restoration projects.

The draft Plan talks about “where we are now” and gives a brief history of why peatland is in a degraded state in parts of Scotland. It identifies the reason as past land management decisions. First of all we should not lose sight of that fact that peatlands are dynamic natural systems. As such some natural erosion will occur. Peat where it exists at substantial depths, or in certain topographies, can “crack” open under its own weight. Once the peat layer is exposed to oxygen, normal decomposition takes place and carbon is lost to the atmosphere. It may repair over time or it may not depending on the location and specific circumstances of the incident.

However, we do not deny that in the main the reason peatland often is not functioning as a carbon sink is largely the result of recent land management history. It is worth clarifying though that what sat behind those land management decisions was post-war public policy lasting through to the early 1980s, whereby society wished to see what was then considered to be “waste ground” transformed into productive land for agriculture and forestry. It was thus drained by landowners and managers to meet this agenda and the aspiration was encouraged by the provision of up to 90% grant aid for drainage from the public purse. The policy was largely flawed. Even in a drained state, deep peat areas were never particularly good at growing trees and while grazing productivity was improved, the gains were marginal. In less peat-rich upland areas, the policy was perhaps more successful in achieving its desired aims. We say this not to identify blame, but rather because it should be recognised that the consensus at the time amongst politicians, many scientists, academics, landowners and managers was that this was the right thing to do. We now know that there were undesirable consequences to these actions, and we should work collaboratively together to rectify the issue.

We are pleased to see that the draft Plan does focus on collaborative effort and recognises the need for partnerships, tools, information, and capacity building. Indeed, much collaborative work is being done. Scottish Natural Heritage’s Peatland Action Programme which has just received a new £8 million injection of Scottish Government funds, represents a very successful model for this type of work. Crucial to its success has been the ethos and attitude of the Peatland Action officers. They are focussed on building relationships, enabling, facilitating and ultimately delivering a good restoration in a straightforward manner. We are pleased Scottish Government has recognised the value of this project and has directed further funds towards it.

The IUCN UK Peatland Code seeks to match potential private funders with peatland restoration projects. This project has also sought to work collaborative with organisations such as ourselves, and is making progress. We ran awareness raising events together last year; an evening reception prior to our Annual Conference and a Royal Highland Show reception. In addition to this, we have helped IUCN UK Peatland Programme identify peatland champions from within our membership which further helps build trust and awareness in peatland restoration and the opportunities that the Code offers to those in a position to restore peatland. This year we plan to undertake a series of six regionally delivered “walk and talk” events on peatland restoration, the first of these will take place on 20 March at Edinglassie Estate in Aberdeenshire.

Landowners and managers are willing to restore peatland. They increasingly understand the imperative to do so. However, the 600,000 hectares identified as

damaged is substantial. The funding needed to undertake this could be estimated to be around £20 million a year to deliver the annual 20,000 hectare target – that is assuming an average restoration cost of around £1,000 per hectare.

The Scottish Rural Development Programme offers some funding, but is more cumbersome to access than Peatland Action, nevertheless it offers some contribution to the overall total required. The Peatland Code is also a mechanism for levering in private funding. Private businesses looking to offset their carbon emissions as well as contribute to natural flood management, water quality and improved biodiversity may represent the best long-term means of funding peatland restoration and maintenance. It would reduce reliance on the public purse and offers a route by which private businesses could undertake natural capital accounting, thus ensuring their business model is truly sustainable. The Scottish Government may wish to think about whether some funding to develop this model would be a good investment to decrease the future burden of restoration on the public purse.

The final comment we would make about funding is that it needs to be consistent and certain over a number of years. Lead in times for projects can be substantial, particularly where a few landowners are collaborating to restore a large area of peatland which crosses property boundaries. Further, contractors are only likely to invest in machinery and training if they can see work being available in the medium to long-term, and we will also only attract and retain the best peatland officers if they can see that their posts are relatively stable.

If met, the annual targets identified would take us to a position of having restored 50% of the 600,000 hectares figure identified in the draft Plan as requiring attention. This would represent impressive progress from where we are today and would make the overall ambition to 2050 seem achievable.

In agreeing the targets it should be borne in mind that peatland restoration cannot occur all year round, there are windows of opportunity for doing such work particularly in upland settings. The weather, which impacts on the ground conditions, is a major factor, and usually restricts work to late spring and summer. There are other constraints too such as bird nesting and other wildlife breeding restrictions on some sites, and the requirement to meet deer cull targets at the end of the summer and autumn within the red deer range.

Section 14 – Agriculture (*for consideration primarily by the Environment, Climate Change and Land Reform Committee*)

Scottish Land & Estates recognises that the agricultural sector is currently a large contributor to greenhouse gas emissions in Scotland. This is largely because the sector as a whole at the current time is an emitter of methane and nitrous oxide gases which have a much more powerful warming effect than carbon dioxide.

While we welcome the policies and proposals in the draft Plan for agriculture, we also feel that there are many farmers already voluntarily exceeding these expectations.

We appreciate that the draft Plan sets out to improve understanding and encouraging a more widespread change of agricultural practice, so that all farming business do more to mitigate climate change and we are of course fully supportive of this ambition. We would however encourage the Scottish Government to think about how it can also help, those who we know are “ahead of the game” already to do even more and to share their experience with others.

We are pleased to see that the draft Plan makes a strong link between efficiency savings which are good for farmers’ bottom line and practice which reduces greenhouse gas emissions. Proposals to improve marketing of Scottish produce based on quality and environmental credentials is also very welcome.

Further we are also pleased to see the suggestion of payments for carbon sequestration. Since there are proposals around carbon capture and storage with the draft Plan, then it also seems sensible and logical to pay those that sequester.

However, there are farmers in Scotland who are farming in ways which take account not just of soil pH levels and nitrogen use, but which consider all of the inputs to their farming system, so energy, carbon, nutrients and water, the pathways that are taken through the farm and then their output. Major adjustments are being made to farming practice in terms of whether cattle are housed or grazed year round, in terms of livestock and arable rotations, in terms of arable to arable rotation and in terms of tillage practices and the use of legumes. Programmes such as “Farming for a Better Climate” have been invaluable in terms of sharing and learning, but we feel so much more could be done in this regard.

We are unclear as to why in this context tenant farmers are singled out for special attention. While we do not object to support for tenant farmers, tenure would seem to be unimportant in terms of implementing farming practices that reduce greenhouse gas emissions and improve carbon sequestration. Surely all farmers

potentially need support with behaviour change, albeit some are early-adopters and ahead of the game. No doubt some of these early adopters are tenant farmers.

There is also concern over the role of AD plants in agriculture. While there are benefits to be gained from handling slurry and manure through such plants, there are also question marks over whether they actually reduce net emissions from agriculture and it would be helpful if this was better quantified in the document. Where additional feedstocks come from – how far they are travelled and the opportunity cost of producing them – also needs to be considered when thinking about the overall effectiveness of AD plants in meeting targets.

Farm tree planting targets may be the best way to get areas planted, but this does not necessarily equate with the right tree in the right place for the right reason. We need to guard against creating “unmanaged woods” in odd pockets of farmland. An action around the preservation/restoration of Ancient Woodland is probably one of the best ecological gains, but it never seems to be a target for sufficient grant aid and should perhaps be considered.

Finally, at 14.4 we agree that through generating income or cutting energy bills by producing renewable heat and electricity has potential economic benefits for farm businesses, but these must be balanced against any initial capital costs of fitting energy efficiency measures.

Anne Gray
Senior Policy Officer
Scottish Land and Estates
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