

RURAL ECONOMY AND CONNECTIVITY COMMITTEE

SUBMISSION FROM NFU SCOTLAND

THE DRAFT CLIMATE CHANGE PLAN (RPP3)

Introduction

1. The farmers and crofters of Scotland are on the front line in experiencing the impacts of Climate Change. It is testament to their resilience and professionalism that they continue to produce high quality food in the face of a challenging market and support system, uncertainty generated by the vote to leave the EU, and increasingly volatile weather.
2. Scottish farmers and crofters are enthusiastically adopting new technology and knowledge to produce food in ever more efficient ways. The drive to farm more efficiently, profitably and sustainably is evidenced by the emissions reductions already achieved within agriculture (25 percent from 1990 to 2014) and by the interest farmers and crofters have shown in initiatives like 'Farming for a Better Climate'.
3. Farmers and crofters also steward much of the farmland, forestry and peatlands that acts as a huge carbon sink – an effort they receive no formal recognition for in international carbon accounting.
4. NFU Scotland broadly welcomes the proposals set out in the plan, and in particular the commitment from Scottish Government to work with the sector to ensure that policies are implemented in a pragmatic way.
5. It is right and proper that Scottish agriculture shows willingness to play its part in addressing the challenges presented by Climate Change, and opportunities exist for farmers and crofters to do this in a way that is also to the benefit of their businesses. NFU Scotland is committed to playing a positive role in that effort.

General observations

6. NFUS believes that a regulatory approach to reducing emissions risks not delivering achieving genuine attitudinal and behaviour change. NFUS instead advocates that most profound and long-lasting changes in attitudes and behaviour are achieved where farmers and crofters are shown what the challenge is and what they can do about it, and are then empowered to make decisions and changes in their business.
7. If a regulatory approach is adopted, the approach taken by SEPA in the Diffuse Pollution Priority Catchments is a model of best. Furthermore, whilst this effort has not directly aimed to reduce Climate Change emissions, it has done so indirectly.
8. Unlike all other sectors apart from forestry, agricultural emissions are in large part due to a biological (rather than chemical or mechanical) process. It is recognised that baseline data and monitoring of such processes are improving but far from ideal, and that mitigating biological emissions is very challenging.
9. The Intergovernmental Panel on Climate Change (IPCC) guidance on calculating emissions and sequestration, and the ensuing UK Greenhouse Gas Inventory, mean that the reductions indicated in the agricultural carbon envelopes do not take account of farmers and crofters sequestering carbon via management of forestry and peatlands, nor the generation of renewable energy on-farm.
10. Farming for a Better Climate (FFBC) has been strongly supported by NFUS and many within farming. It is a successful model that now needs some adjustment and additional resources to reach new audiences. In time, the scheme could also be developed and co-opted to assist with the marketing of Scottish produce in international markets for its green credentials.

11. Whilst FFBC has been success, NFUS advocates that more knowledge transfer is needed to engage more than the 'early adopters'. There is a growing body of research, good practice and new technology which needs to be made accessible and digestible for farmers and crofters.
12. There is a vital role for the education and training system in embedding the required knowledge and attitudes at an early stage of farmers' and crofters' lives, and reinforce and update it thereafter. Furthermore, it is important that efforts are made to reduce or remove some of the artificial and counter-productive barriers between the study of 'environment and land use' and 'agriculture'.
13. Scotland has a valuable network of professional advisors, stretching from consultants to agronomists, as well as a Farm Advisory Service. Their capacity to deliver good quality advice to farmers and crofters on how to reduce their emissions and increase their resilience should be increased and used more frequently, taking care to avoid duplication and mixed messages.
14. Scotland's land managers are enthusiastic about using new technology, such as that in precision farming, to increase their efficiency. The fixed costs for new machinery and technologies can be unaffordable for many, meaning there is a need to help to spread these costs through partnership and cooperative working (e.g. machinery rings).
15. Extensive livestock production is less reliant on technology than other parts of the agricultural economy, so emissions reduction from this and the wider livestock sector, will be delivered through improvements in breeding, animal welfare and disease. The Scottish Government's Beef Efficiency Scheme and disease eradication initiatives are welcome investments in this area.

16. NFUS considers it sensible to focus on raising awareness and knowledge transfer in the early years of the Climate Change Plan, as there still needs to be much deeper and wider engagement beyond the 'early adopters'. From the second year onwards, significant policies will come into effect and it is important that these are well designed to encourage uptake, minimise bureaucracy and deliver real improvements.

Comment on policies and proposals

17. Establish an agri-tech group – NFUS welcomes this but urges that it compliments rather than duplicates the UK agri-tech strategy.

18. Consult on how best to ensure maximum take up of carbon audits – If done well, NFUS is supportive of measures such as carbon audits.

19. Develop a low carbon package for tenant farmers – NFUS acknowledges the particular challenges of investing in some tenant farms, and looks forward to working with Scottish Government and others to overcome these.

20. Introduce a Low Carbon Farming marketing scheme – NFUS welcomes the willingness to explore the potential of such a scheme, but cautions that it will take considerable investment if it is to be a success and is likely to deliver results for a relatively small part of the agricultural sector. It should be pursued but there must be realism about its potential to transform the sector.

21. Developing a science-based target for reducing emissions from nitrogen fertiliser – NFUS believes that such an exercise would be better done at individual farm level, by businesses being encouraged to make informed decisions, rather than a top-down recommendation.

22. Soil testing – NFUS agrees with the intent of encouraging farmers to test their soils. NFUS would like to see robust data on current uptake and to work with Scottish Government to ensure this is rolled out proficiently, professionally and avoiding compulsion and bureaucracy wherever possible.

23. Minimum leguminous crops in rotation – NFUS is opposed to a mandatory requirement (not least due to geographical limits on production) but believes that Scottish Government could facilitate a significant increase planting of leguminous crops by changing the existing Nitrogen Fixing Crop (NFC) rules within the Greening regulations. This could be done by removing the requirement for two NFC to be grown on one farm, by removing the requirement for a field margin around NFC, and by changing the date after which NFC can be harvested from 1 August to 1 July.
24. Plant varieties with improved nitrogen use efficiency – NFUS welcomes new breeding programmes and investment in our research capabilities here in Scotland. These varieties need to deliver good nitrogen use efficiency but also need to be able to deal with the volatile climate, pests and diseases, as well as being acceptable to customers and consumers.
25. Publish emissions intensity figures for beef, lamb and milk – NFUS supports benchmarking at a peer-to-peer level, but is concerned that if done at a sector or Scotland level will become a tool to unfairly blacklist certain agricultural products or sectors.
26. Livestock feed additives to reduce methane – NFUS would wish to be clear that investment in this area was going to deliver not only emissions reductions but also value to the farm business, particularly if the cost is significant.
27. Self-financing large-scale anaerobic digesters – NFUS would support further examination of this however it is a very complex area and again, members would need to be sure of the economic viability before investing heavily. NFUS also notes that it is likely that these sites would be in livestock areas as that is where the feedstock is. Whilst this captures these products and minimises emissions, it is important not to deprive arable or mixed units of valuable slurries and manures, nor see the concentration of digestate application in areas close to the anaerobic digesters. NFUS also notes that for many, there are pre-existing issues in getting such developments off the ground due to issues with the planning system and/or gaining a connection to the grid.

28. Inclusion of livestock grazing in rotation on current arable land – NFUS can see the value in this proposal, however notes that it would require relationships to be built between the farmers of the two farming systems.
29. Minimise emissions from slurry storage – NFUS notes that this proposal does present challenges in terms of cost, as well as health and safety.
30. Increased planting of trees and hedgerows – NFUS supports this policy provided it is implemented sensitively (i.e. the right tree in the right place) and neither skews the land market, nor affects the critical mass of agricultural businesses in certain areas. NFUS also advocates that the Greening rules be amended to include the hedgerows and trees options, and that the requirement for new hedges to have a two metre no-cultivation strip alongside them be removed.
31. Payment for carbon sequestration – NFUS supports further examination of this and urges this work to happen as soon as possible. The example of the Peatland Code is evidence that this can work.
32. Forestry and woodland cover for agricultural land – Scotland already has ambitious tree planting targets which we are now beginning to achieve. NFUS sees no need or value in Government dictating where those trees should go. NFUS would rather this was done as a mutually beneficial and economically rationale partnership between farmers and foresters.

NFU Scotland
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