

## Written submission from RSPB Scotland

### Summary

- RSPB Scotland is deeply disappointed with the budget and that Government chose to transfer only 9.5% using the flexibility mechanism - we called for the full 15%.
- The assessment process must be designed to select and accept applications which aim to provide the greatest environmental benefit. We recommend that applications with options to support iconic species and designated sites are assessed by SNH.
- **The SRDP should support High Nature Value (HNV) farming systems.** LFASS does not provide value for money as it provides **very little environmental benefit.**
- We see the potential of the Agri-Environment-Climate scheme but are concerned about the lack of details in the proposals and the insufficient budget. We believe a minimum of £60m per year is needed.
- We are quite satisfied with proposals for the Forestry Grant Scheme. This scheme must improve the biodiversity value of existing woodlands and ensure woodland creation enhances the environment. New woodland must be designed and located to ensure biodiversity protection and not compromise other SRDP objectives.
- We welcome the inclusion of **a cooperation** fund into the scheme and the increased role for advice provision. However, we are concerned that the budgets will be insufficient and want to see more details regarding how these elements will be implemented.

### Introduction

RSPB Scotland welcomes the opportunity to respond to this consultation on the future of land management grant schemes for Scotland. This is a paper version of our response given via the Scottish Government's internet-based response form.

Our response to the Stage 1 consultation can be downloaded<sup>1</sup>.

RSPB Scotland<sup>2</sup> is part of the RSPB, which speaks out for birds and wildlife, tackles the problems that threaten our environment and promotes the conservation of wild birds and their habitats. We are supported by nearly 90,000 members in Scotland, with a strong membership base in rural areas as well as in towns and cities. We have practical experience of managing terrestrial, aquatic and coastal habitats for conservation, farming, forestry and other enterprises, and of providing advice to land managers. RSPB Scotland manages more than 68,000 hectares of land, much in management agreements with local farmers, crofters and graziers. Our land management interests cover a wide range of habitats and geographic areas within Scotland. We undertake biological and economic research to underpin our policy

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<sup>1</sup> [http://www.rspb.org.uk/Images/Stage1\\_response\\_final\\_tcm9-350752.pdf](http://www.rspb.org.uk/Images/Stage1_response_final_tcm9-350752.pdf)

<sup>2</sup> The Royal Society for the Protection of Birds (RSPB) is a registered charity: England and Wales no. 207076, Scotland no. SC037654

analysis and advocacy. We also have experience of environmental education and training for all ages. The RSPB is the BirdLife International partner in the UK.

[This is RSPB Scotland's response to the Scottish Government's consultation on the Scotland Rural Development Programme (SRDP) 2014 – 2020, Stage 2: Final Proposals]

## **SECTION 4 – BUDGET FOR SRDP 2014 - 2020**

### **Question 1**

*How would you rate your satisfaction with the budget as a whole?*

Very satisfied

Quite satisfied

Neither satisfied nor dissatisfied

Quite dissatisfied

**Very dissatisfied**

**RSPB Scotland is deeply disappointed with the SRDP budget and consider it a bad deal for wildlife-friendly farming.** With Scottish Environment LINK we called for Government to use the flexibility mechanism under CAP rules to transfer the full 15% of funds from Pillar 1 to Pillar 2<sup>3</sup>. Government chose to transfer only 9.5% which results in the SRDP budget being approximately £220m lower than what it could have been.

As we explain in answer to Question 3 below, we believe the LFASS budget is too large, especially in comparison with the Agri-Environment-Climate (AEC) budget (£355m). The AEC budget includes £15m of money for peatland restoration already announced by Government. £340m split over 7 yrs amounts to £48.5m. We recommend a budget of at least £60 million per annum or £420m as the very minimum required to meet biodiversity, water quality and climate change objectives and targets. The budget of £48.5 m per annum appears to be an increase on the current scheme, however, in reality this returns the budget to levels prior to cuts imposed by the Scottish Government.

## **SECTION 5 – RURAL REGIONAL DELIVERY PARTNERSHIP FOR LAND BAED INVESTMENTS**

### **Question 2**

*Are you broadly satisfied with the new application and assessment process for land based investments outlined in section 5?*

Very satisfied

Quite satisfied

Neither satisfied nor dissatisfied

**Quite dissatisfied**

Very dissatisfied

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<sup>3</sup> <http://www.scotlink.org/files/policy/Correspondence/LINKCAPLetCabSecDec2013.pdf>.

RSPB Scotland is concerned that **the SRDP assessment process must be designed to select and accept applications which aim to provide the greatest environmental benefit. The process must include agreed selection criteria, agreed prioritisation at a regional level, and a transparent scoring system.**

RSPB Scotland's concerns with the application and assessment process relate to the quality of agreements being approved rather than the ease of access per se. For example:

- We strongly question the ability of RPID officers, who in many cases lack environmental expertise or qualifications, to assess the quality of some types of application. **We recommend that applications which include options for iconic bird species<sup>4</sup>, in addition to those in designated areas, should be assessed by SNH rather than RPID case officers.**
- We recommend that the eligibility of applications containing specific Agri-environment-climate options and Forestry Grant Scheme options is endorsed by a recognised conservation body (this has been proposed in the development of some Agri-environment-climate options). RSPB Scotland would welcome the opportunity to support the SRDP and applicants in this way in order to ensure options are located where they are needed and appropriate.
- We are concerned that the expert panel at a national level will not have the necessary local knowledge to make the best decisions. We recommend that these decisions be made at a regional level.
- We believe that the £75k and £750k for forestry bandings, be lowered for the Level 2 applications. We are concerned that significantly large applications which may offer poor value for money may be approved by one case officer only. To reduce this risk we recommend a reduction in the value of applications which must go to the Level 2 to £50K and £500K for forestry. We remain wedded to the need for clear priorities and criteria for assessment but believe a lower cut-off level would reduce the risk of high cost low value contracts.

We are concerned with the proposals for **application limits**, i.e. a single application per applicant for each scheme per year. This will be overly restrictive to land managers who have more than one significant holding but one farm code. Land manager with large areas of land outside designated sites and with more than one holding will, for example, only be allowed to apply for once per year to the Agri-Environment-Climate scheme even if they have the capacity to submit a number of high quality applications. We believe that targeting and improved scoring of applications should ensure that the best applications are approved, irrespective of who makes those applications. The application and assessment process shouldn't be about spreading the money across the farming community but about delivering the best outcomes.

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<sup>4</sup> SNH's Iconic species list.

## **SECTION 6 – FUTURE SUPPORT FOR LESS FAVOURED AREAS (LFASS)**

### **Question 3**

*Should support for farmers operating in constrained areas be continued through the SRDP?*

Yes

No

**Other**, please specify (in the space given in the online questionnaire).

We accept, in principle, the need to support farmers operating in constrained areas through the SRDP. However, we believe that **support should be targeted at the most economically disadvantaged and environmentally important farms within the uplands of Scotland, i.e. High Nature Value farming systems**. The current LFASS results in higher levels of support going to the more productive and least disadvantaged areas in the LFA; this is counter to the spirit and intentions of the EU regulations and fails to provide support to where it is most needed. In addition, LFASS does not require recipients to meet environmental conditions.

The proposal to allocate at least 35% of the SRDP budget to such a poorly targeted and ineffective scheme is, in our view, to the detriment of the new Programme and constrains expenditure on other measures which can yield more beneficial outcomes. We wish to see the redesignation to ANC, and the introduction of a more effective support scheme, undertaken as soon as possible.

## **SECTION 7 – NEW ENTRANTS SCHEME**

### **Question 4**

*How would you rate your satisfaction with the proposals for the New Entrants Scheme?*

Very satisfied

Quite satisfied

**Neither satisfied nor dissatisfied**

Quite dissatisfied

Very dissatisfied

RSPB Scotland recommends that the New Entrants Scheme ensures that beneficiaries are guided towards environmentally sustainable businesses. It is essential that applications are assessed on their environmental impacts, rather than focussing entirely on the likely economic benefit to Scotland.

## **SECTION 8 – CROFTING & SMALL FARM SUPPORT SCHEME**

### **Question 5**

*Should a scheme be expanded to provide capital support to small farms*

Yes/**No**/No opinion.

We recognise crofting as a distinct form of land tenure in Scotland which has helped to create and maintain a rich and varied natural environment, as well as support rural

communities in some of the most remote regions. Crofting faces numerous challenges however, and we believe there is some merit in a crofting specific support scheme. Our preference is for an integrated scheme which brings together general agricultural support measures, such as those under the current CCAGS, with agri-environment support in order to encourage and maintain environmentally beneficial crofting systems. Funding to encourage the establishment of Grazings Committees and the production of Land Management Plans for Common Grazings, should be an integral part of this. If such an integrated scheme is not possible, we would accept some on-going capital support to crofts, of the nature currently provided by CCAGS, in order to help crofting continue. Under this scenario, we believe greater effort will also need to be made – through the application process and advisory services – to help crofters access agri-environment and other SRDP schemes. As noted above, support for Grazings Committee will also be important.

We have reservations about extending capital support and making it available to all small farms between 3 and 50ha across Scotland. Whilst some small farms face the same disadvantages and challenges as crofts, e.g. located in remote areas with higher production and investments costs, many do not, nor do they display the same characteristics as crofting which is widely regarded as socially, culturally and environmentally important. We therefore make a distinction between crofts and small farms.

We do acknowledge however that there have been difficulties for small farms in terms of accessing other SRDP funding in the past; we believe this can be improved in the new SRDP through the application process and supporting advisory services, without the need for a specific scheme for small farms.

**Question 6**

*Is a 3 to 50 hectare range appropriate for defining a small land holding?*

Yes/No/**No opinion**

**Question 7**

*Do you agree with the proposal for grants of £500 to be available to assist the establishment of Grazings Committees?*

**Yes**/No/ No opinion

**Question 8**

*How would you rate your broad satisfaction with the proposals for the Crofters and Smallholders Scheme?*

Very satisfied

Quite satisfied

Neither satisfied nor dissatisfied

**Quite dissatisfied**

Very dissatisfied

## **SECTION 9 – AGRI-ENVIRONMENT-CLIMATE SCHEME**

### **Question 9**

*How would you rate your broad satisfaction with the proposal for the Agri-Environment-Climate Scheme?*

Very satisfied

Quite satisfied

Neither satisfied nor dissatisfied

**Quite dissatisfied**

Very dissatisfied

## **SECTION 8 – CROFTING & SMALL FARM SUPPORT SCHEME**

### **Question 5**

*Should a scheme be expanded to provide capital support to small farms*

Yes/**No**/No opinion

We recognise crofting as a distinct form of land tenure in Scotland which has helped to create and maintain a rich and varied natural environment, as well as support rural communities in some of the most remote regions. Crofting faces numerous challenges however, and we believe there is some merit in a crofting specific support scheme. Our preference is for an integrated scheme which brings together general agricultural support measures, such as those under the current CCAGS, with agri-environment support in order to encourage and maintain environmentally beneficial crofting systems. Funding to encourage the establishment of Grazings Committees and the production of Land Management Plans for Common Grazings, should be an integral part of this. If such an integrated scheme is not possible, we would accept some on-going capital support to crofts, of the nature currently provided by CCAGS, in order to help crofting continue. Under this scenario, we believe greater effort will also need to be made – through the application process and advisory services – to help crofters access agri-environment and other SRDP schemes. As noted above, support for Grazings Committee will also be important.

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Very satisfied

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Neither satisfied nor dissatisfied

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**SECTION 9 – AGRI-ENVIRONMENT-CLIMATE SCHEME**

**Question 9**

*How would you rate your broad satisfaction with the proposal for the Agri-Environment-Climate Scheme?*

Very satisfied

Quite satisfied

Neither satisfied nor dissatisfied

Quite dissatisfied

Very dissatisfied

RSPB Scotland welcomes many of the plans and new elements of the proposed AEC scheme, however, a lack of detail regarding the elements of the scheme and an insufficient budget leave us unable to be satisfied with the proposals.

Because this section is short on detail, (especially compared to the Forestry section) it is difficult to judge the likely outcomes of the scheme and be satisfied. Our opinion therefore may change if details match the promises regarding option design, targeting, option prioritisation, and scoring and assessment of applications. We would like to be consulted on further details as soon as possible.

Furthermore, as already stated in answer to Question 1, we believe the budget for the AEC scheme is too small especially with the scope of the scheme being broadened in the new SRDP to meet the objectives for climate change, water quality and flooding. We believe that a minimum of £60m per year is needed to adequately meet the objectives and aims of this scheme.

We welcome the greater focus on targeting scheme options. We have called for this in the past and believe, if well designed, it will result in money being spent where it is

needed. We would like to see high priority given to careful targeting of options focussed on biodiversity and especially priority bird species, such as corncrake and cornbunting. We also recommend that care is taken when overlaying priorities to reduce the risk of perverse outcomes, for example areas targeted for woodland planting on the same areas targeted for breeding wader habitats would cause a significant conflict.

## **SECTION 10 – FORESTRY GRANT SCHEME**

### **Question 10**

*It is proposed to support forestry under six main areas as outlined in table 4 below. Please identify whether you agree with these broad areas.*

- Woodland creation – **YES**
- Agroforestry – **YES**
- Tree health – **NO**
- Improvement of existing woodlands – **YES**
- Wood/timber processing and marketing – **YES**
- ‘Sustainable management of forests’ – **YES**

The RSPB has concerns that all these measures must be properly targeted to ensure biodiversity protection and enhancement, for example related to the location and design of new forestry and the management of existing woodlands.

We have a concern that the proposed option for a new woodland model for native broadleaved woodland of National Vegetation Classification W4 type should be targeted to creating UK Biodiversity Action Plan priority native woodland habitats, and must not be inappropriately located on restorable peatland habitats.

We also have concerns about potential impact of the new plant health options on the overall budget spend, as well as how forest plant health issues are addressed through the design and targeting of measure that ensure biodiversity is protected. We do not support this inclusion. See our answer to question 17 (below) for further justification.

We support the use of Section 11 grants for co-operation to facilitate the restoration of biodiversity of priority native woodland habitats and work for priority wildlife species.

### **Question 11**

*We propose nine woodland creation options with support through standard costs. Should these be included? Yes/No/No opinion.*

- Conifer – **YES**
- Diverse Conifer – **YES**
- Broadleaves – **YES**
- Native Scots Pine – **YES**
- Native Broadleaved W4 – **NO**
- Native Broadleaved Other – **YES**

- Native low density – **YES**
- Small or Farm Wood – **YES**
- Northern and Western Isles – **YES**

**Conifer, Diverse Conifer, Broadleaves** - RSPB Scotland is concerned about threats to breeding wading bird habitats, priority habitats and priority flora from poorly located new woodland of all types, sizes and contexts. This includes new non-native forestry plantations of conifer, diverse conifer and non-native broadleaves. **It is important that the Woodland Creation Options 1, 2 & 3 (conifer, diverse conifer and non-native broadleaves) are carefully designed and located to ensure biodiversity protection.** This includes in grant requirement and approval processes, environmental impact assessment of site and cumulative impacts and UK Forestry Standard compliance. We are unclear what environmental benefits these woodland creation options offer.

**Native Scots Pine** - We support this native pinewood priority habitat woodland model, but note the importance of improving the ecological quality and condition of existing priority native woodland habitats.

**Native Broadleaved W4** - We are concerned that the proposed option for a new woodland model for native broadleaved woodland of National Vegetation Classification (NVC) W4 type (Option 5) 'on upland shallow peaty soils' may not be targeted to creating UK Biodiversity Action Plan priority native woodland habitats, and may also be inappropriately located on restorable important peatland habitats through first afforestation or as an alternative woodland type for restocking. RSPB Scotland is not supportive of measures and their approval mechanisms that result in inappropriately located or designed 'transitional woodland'/ 'peatland edge woodland' that causes direct and indirect biodiversity and hydrological loss and damage to priority open ground habitats and populations of important open ground species. **We do not, therefore, believe that this option should be supported in the SRDP.** We are also concerned that the priority native woodland habitats (UK BAP priority habitat types in the Scottish Biodiversity Strategy) have been partially split into different models. It would be most appropriate for each priority native woodland UK BAP HAP type woodland to be placed in a discrete woodland model to allow best targeting and appropriate design of options.

**Native Broadleaved Other** - We are concerned that the priority native woodland habitats (UK BAP priority habitat types in the Scottish Forestry Strategy and Scottish Biodiversity Strategy) have been partially split into different models. It would be most appropriate for each priority native woodland UK BAP HAP type woodland to be placed in a discrete woodland model to allow best targeting and appropriate design of options. RSPB Scotland welcomes the introduction of a low density native woodland planting model as a mechanism for black grouse habitat creation, creation of treeline woods and montane scrub. It is important that this is targeted to give maximum benefit to priority wildlife habitats and priority species, and carefully located so as not to cause direct and indirect biodiversity loss or damage, for example to priority open ground habitats through tree planting or from providing a new neighbouring seed source for open ground habitats.

RSPB Scotland welcomes the continued support for native woodland creation targeted to the priority native woodland habitat types. We do note the importance of improving the ecological quality of existing native woodland remnants of priority habitats, and work for associated priority species; we welcome this through the proposed native woodland improvement grants. We would be concerned if the main focus of native woodland grant funding was on woodland creation, rather than woodland improvement.

**We would welcome scheme design and approval mechanisms to encourage woodland owners and managers to undertake measures to protect and enhance the biodiversity of existing native woodland habitats on their land before seeking support for native woodland creation.** This includes woodland on farms, ensuring the biodiversity condition of existing native woodland is considered as part of a whole farm plan and measures taken to improve its biodiversity value in preference to creating new woodland (which may be of lower biodiversity value and may even pose a threat to important non-woodland habitats and species if not required to be sensitively located through UK Forestry Standard compliance and environmental impact assessment).

**Native Low Density** - RSPB Scotland welcomes the introduction of a low density native woodland planting model as a mechanism for black grouse habitat creation, creation of treeline woods and montane scrub. It is important that this is targeted to give maximum benefit to priority wildlife habitats and priority species, and carefully located so as not to cause direct and indirect biodiversity loss or damage, for example to priority open ground habitats through tree planting or from providing a new neighbouring seed source for open ground habitats.

RSPB Scotland is concerned about threats to breeding wading bird habitats, priority habitats and priority flora from poorly located new woodland of all types, sizes and contexts. This includes new farm woodland and conifer plantations, to the introduction of a new peatland planting woodland model.

We are concerned that small scale woodland planting on farms will have no requirement for UK Forestry Standard compliance unlike other woodland options. This poses a threat to important wildlife habitats and species as there may be little consideration of the environmental impacts at either site or cumulative levels of such planting, and no checks on the location, or design of the proposed woodland or ecological survey, as UK Forestry Standard compliance may not be a condition in grant rules and approval. RSPB Scotland welcomes the continued support for native woodland creation targeted to the priority native woodland habitat types. We do note the importance of improving the ecological quality of existing native woodland remnants of priority habitats, and work for associated priority species; we welcome this through the proposed native woodland improvement grants. We would be concerned if the main focus of native woodland grant funding was on woodland creation, rather than woodland improvement.

**Small or Farm Wood** - We would welcome scheme design and approval mechanisms to encourage woodland owners and managers to undertake measures to protect and enhance the biodiversity of existing native woodland habitats on their land before seeking support for native woodland creation. This includes woodland on

farms, ensuring the biodiversity condition of existing native woodland is considered as part of a whole farm plan and measures taken to improve its biodiversity value in preference to creating new woodland (which may be of lower biodiversity value and may even pose a threat to important non-woodland habitats and species if not required to be sensitively located through UK Forestry Standard compliance and environmental impact assessment).

**We would also be highly concerned if any approval process for agricultural grants favoured woodland creation purely on a points scoring basis, without any consideration of the location or design of the new planting, its biodiversity quality and the type, quality and condition of existing woodland and non-woodland habitats on the farm.**

We note that the Scottish Government's international commitments to sustainable forest management, including implementation via the UK Forestry Standard and its associated Forest Guidelines, does not exclude woodland creation or management on farms (or for woodland work consented via the town and country planning system, or for water management).

**Northern and Western Isles** - The continuation of support to woodland creation in the Northern Isles and the Western Isles under the proposed Woodland Option Model 9, must ensure that new woodlands are carefully located to avoid direct and indirect biodiversity loss or damage to priority non-woodland habitats and to populations of priority open ground species, such as breeding wading birds. UK Forestry Standard compliance must be a requirement under the grant scheme, and site and cumulative environmental impacts assessed.

## **Question 12**

*Are there any other woodland types that should be supported?*

**Yes/No**

We have a concern that the priority native woodland habitats (UK BAP priority habitat types in the Scottish Biodiversity Strategy) have been partially split into different models. It would be most appropriate for each priority native woodland UK BAP HAP type woodland to be placed in a discrete woodland model to allow best targeting and appropriate design of options.

The proposals have a separate native pinewood priority habitat model, which we support; there is also an NVC W4 model (which could contribute to UKBAP Wet Woodland priority HAP) and then a 'Native Broadleaved – Other' model for the rest of the Wet Woodland priority HAP and the remaining native woodland priority HAPs – Upland Birchwood, Upland Mixed Ashwoods, Upland Oakwood and Lowland Mixed Deciduous woodland. We suggest that a woodland option and model for each UKBAP native woodland HAP type is needed, noting our reservations of separating NVC W4 woodland out of the Wet Woodland HAP type.

### Question 13

*Should the Central Scotland Green Network be allowed an Additional Cost Contribution?*

Yes/No

We support this on condition that the new woodland is created to provide biodiversity benefits and located and designed not to cause biodiversity loss or damage to priority habitats or species.

We question the emphasis on woodland creation, as there will be native woodland in the Central Scotland Green Network, as well as afforested open ground habitats, that require support via woodland improvement grants to restore their biodiversity value.

### Question 14

*What is your preferred option for Income Foregone in SRDP 2014 - 2020?*

Option 1

Option 2

Option 3

Please explain your choice

**NO PREFERRED OPTION**

**A key issue for RSPB Scotland is minimum environmental standards related to woodland location and design, and the assessment of both site and cumulative environmental impacts, for example on breeding wading birds. This must apply to whichever Income Foregone Option is selected.**

We note that there are existing native woodland on agricultural land that requires restoration and management to enhance its biodiversity condition. RSPB Scotland would be concerned if the emphasis of grant support for farm woodland is mainly focused on woodland creation, rather than support via woodland improvement grants to restore the biodiversity value of extant woods.

### Question 15

*Do you agree with the range of other support for woodland creation?*

Yes/No/No opinion

- Tree shelters and fencing – **No opinion**
- Improved stock for Sitka spruce – **No opinion**
- Bracken Contribution – **No opinion**
- Support for Community Woodland – **No opinion**

It is unclear why this measure is offered, rather than included within the Standard Costs for each woodland creation option planting model. If this approach is considered, it should include support for biodiversity restoration and management on difficult sites that require higher standard costs, or additional operations, than covered by the woodland creation options funding models.

This support must be for assisting the production of public benefits, including the protection and enhancement of biodiversity.

**Question 16**

*Should agro-forestry be funded through the SRDP 2014 - 2020?*

Yes/No/No opinion

We recommend that this option is given a higher priority where it supports UK Biodiversity Action Plan priority habitats and meets the UK Forestry Standard to ensure careful location and targeting to protect the environment. This could include helping improve the ecological condition of priority native upland and lowland wood pasture and parkland habitats and species, for example parts of upland mixed ashwoods and upland oakwoods, upland juniper scrub, montane scrub and treeline woodlands.

This measure must not be used to support inappropriate levels of grazing and browsing that cause new or continued loss or damage to priority habitats and impacts to priority species. The needs of woodland grouse must be factored in to the design of grazing and deer control approaches and the use and design of fencing.

**Question 17**

*Should Tree Health be funded through the SRDP 2014 - 2020?*

Yes/No/No opinion

The selection of which forest pathogens, pests and diseases and what control approaches are supported needs to be focused to protecting public benefits, including biodiversity. This is not just an economic, or timber issue. For example work on *Phytophthora ramorum* needs to consider potential biodiversity threats to heather and blaeberry, and associated wildlife, rather than just a larch timber concern.

We welcome the Scottish Government's action to protect the wildlife of important upland mixed ashwoods, native pinewood and upland juniper from plant pathogens, from research to survey work, advice to woodland owners, manager and users, and control measures.

There must be a requirement to carry out control measures in a way that protects the environment, including avoiding disturbance to priority wildlife species, loss or damage to priority habitats. All work must be carried out in accordance with the UK Forestry Standard and this to be a condition of grants.

We question whether such work should be core funded by Scottish Government rather than drawing on limited SRDP funds.

## Question 18

*Do you agree with the range of Woodland Improvement Grants?*

Yes/No/No opinion

- Long term forest planning – new - YES
- Long term forest planning - renewal - YES
- Reducing Deer Impact - YES
- Woodland Habitats and Species - YES
- Restructuring Regeneration - YES
- Non- Woodland Habitats and Species - YES
- Natural regeneration - YES
- Woodlands In and Around Towns - YES

RSPB Scotland supports the proposed options and targeting for priority woodland and non-woodland habitats and priority species under the UK Biodiversity Action Plan habitat types and species (these are embodied in the Scottish Biodiversity Strategy). We also welcome the requirement for a management plan and would welcome continued engagement on the design and guidance of such plans to ensure biodiversity targeting for effective operations to protect and enhance biodiversity.

We note that some of these options will need careful targeting and advisory support to produce effective positive biodiversity impacts. This is needed to ensure high quality biodiversity work in the right places and times, and at sufficient scale and uptake to provide large-scale benefits to priority habitats, priority species as well as designated sites. This will require careful development of scheme rules, guidance, advice and approval mechanisms, as well as use of other measures such as co-operation.

RSPB Scotland looks forward to detailed discussion of options for black grouse, capercaillie and the priority native woodland habitats, as well as work for non-woodland habitats and species.

We note the importance of improving the ecological quality of existing native woodland remnants of priority habitats, and work for associated priority species; we welcome this through the proposed native woodland improvement grants. We would be concerned if the main focus of native woodland grant funding was on woodland creation, rather than woodland improvement.

We would welcome scheme design and approval mechanisms to encourage woodland owners and managers to undertake measures to protect and enhance the biodiversity of existing native woodland habitats on their land before seeking support for native woodland creation. This includes woodland on farms and around towns , ensuring the biodiversity condition of existing native woodland is considered as part of a whole farm plan and measures taken to improve its biodiversity value in preference to creating new woodland (which may be of lower biodiversity value and may even pose a threat to important non-woodland habitats and species if not required to be sensitively located through UK Forestry Standard compliance and environmental impact assessment).

### Question 19

*Should these areas be supported through the SRDP?*

Yes/No/No opinion

- The development of the small scale premium softwood and hardwood processing sector; - **YES**
- Equipment to increase harvesting in small undermanaged woods including small scale purpose built harvesters, machinery and equipment but not tractors; - **YES**
- Equipment to increase capacity for steep ground harvesting. - **YES**

RSPB Scotland welcomes this initiative as a mechanism to encourage the restoration and management of native woodlands to help protect and enhance wildlife. It is important that UK Forestry Standard compliance is required, backed up by advice on ecological survey, management planning, management, voluntary forest management certification of small and/or low intensity forest management within groups of owners, and supply chain development and with scope for collaborative action to facilitate this.

We note that the consultation in paragraphs 215 and 243 when discussing the ‘main RDR’ Articles suggests that Articles on investments in physical assets and co-operation will be available for forestry – we would welcome the use of collaborative measures, in combination with woodland improvement grants and processing and marketing support, with the objective of assisting the improvement the biodiversity condition of native woodlands.

### Question 20

*Do you agree with the range of Sustainable Management of Forest grants?*

Yes/No/No opinion.

- Native Woodlands - **YES**
- Low Impact Silvicultural Systems - **YES**
- Public Access - **YES**
- Public Access WIAT - **YES**
- Livestock Removal - **YES**
- Woodland Grazing - **YES**

RSPB Scotland welcomes the objectives of this to support the sustainable management of high environmental value woodlands. We welcome the inclusion of the ‘native woodlands option’ for maintaining and restoring the ecological condition of existing native woodlands and restoring the biodiversity of ancient woodland sites which are currently plantations.

RSPB Scotland also is pleased to see continued support for conversion to environmental low impact silvicultural systems as a way to seek alternative approaches to forest management that could produce more structurally and ecologically diverse woodlands. It is important that this is targeted to creating and restoring priority native habitats and recognises the value of open ground habitat restoration in key locations.

The livestock removal and woodland grazing options need to be carefully targeted to ensure biodiversity appropriate objectives, actions and operations towards achieving good ecological condition for priority habitats, priority species and designated sites.

**Question 21**

*How would you rate your broad satisfaction with the proposal for the Forestry Scheme?*

Very satisfied

**Quite satisfied**

Neither satisfied nor dissatisfied

Quite dissatisfied

Very dissatisfied

If you are dissatisfied please briefly outline your reasons (in the space given in the online questionnaire).

**We have concerns, detailed in the answers above. We also need to see the detailed design of the options, including regulatory and advisory context, scheme rules and approval mechanisms.**

RSPB Scotland looks forward to working with Forestry Commission Scotland, and other stakeholders, in the design of the options and their approval and implementation mechanisms. These outline proposals include some positive aspects and provide reasonable basis for such discussions, noting our concerns detailed in this consultation response that need resolving.

**SECTION 11 – SUPPORT FOR CO-OPERATIVE ACTION**

**Question 22**

*How would you rate your broad satisfaction with the proposals for co-operation?*

Very satisfied

**Quite satisfied**

Neither satisfied nor dissatisfied

Quite dissatisfied

Very dissatisfied

We welcome the inclusion of support for cooperative action. We welcome this on the condition that the focus of this limited fund is on land-based projects and delivery of environmental outcomes, as opposed to projects aiming primarily for commercial benefit, such as collaborative marketing or food-based projects.

RSPB Scotland is concerned that the budget might not be sufficient to cover the demand, however, we recommend that this scheme is carefully targeted and prioritised to meet SRDP Objectives. We recommend that biodiversity hotspots are identified and targeted for this Cooperation fund in order to restrict it to meet the greatest need and achieve more significant benefit. This approach of targeted hotspots may be appropriate for achieving greater benefit and meeting objectives in the AEC and Forestry schemes.

In supporting the Forestry Grants Scheme we recommend carefully targeting cooperation to priority biodiversity, combined with other work funded by other Articles. For example, restoring the ecological condition of priority native woodland habitats, using collaborative action to assist with large-scale management planning and project working, ecological survey and restoration and management actions under woodland improvement grants (new Article 25), sustainable management of forests (new Article 34), setting-up of producer groups (new Article 27) and investments in mobilising/marketing forest products (new Article 26). Co-operative action could also be helpful in restoring and managing native pinewoods for capercaillie and habitat restoration and creation for black grouse at suitable scales and areas from an ecological perspective.

**We also recommend that the definition of an animator is more clearly defined** and criteria set to ensure that applicants have the skills, experience and contacts to fulfil the role and deliver environmental benefits. For example, we are strongly concerned that this scheme is NOT used by applicants and groups primarily for commercial benefit.

## **SECTION 12 – NON-AGRICULTURAL BUSINESS SUPPORT: SMALL RURAL BUSINESS SUPPORT**

### **Question 23**

*How would you rate your broad satisfaction with the proposals for Small Business Support?*

Very satisfied

Quite satisfied

**Neither satisfied nor dissatisfied**

Quite dissatisfied

Very dissatisfied

We favour support to businesses which help to support and build on Scotland's 'green assets' e.g. opportunities to support eco-tourism. We recommend that applications should be assessed to prioritise those which promote sustainable rural development. No funding should be given to business proposals that might be environmentally damaging.

## **SECTION 13 – NON-AGRICULTURAL BUSINESS SUPPORT: FOOD & DRINK**

### **Question 24**

*Do you agree with the proposal that we should continue to give significant support to the food and drink sector?*

**Yes/No/No opinion**

RSPB Scotland recognises the role for EAFRD in supporting the food and drink sector. We believe that the role of the SRDP in this should be to support small-scale enterprises and funding should be focused on developing new, small-scale, artisanal food and drink businesses with a strong environmental brand (quality products from a quality environment type idea) or those which link to healthier eating.

We recommend a reduction in the proposed budget, for example to £50m, to free up funds for already underfunded SRDP schemes, especially the Agri-Environment-Climate scheme. Other European Structural and Investment Funds could then play a bigger role in supporting the wider food and drink sector and the more export orientated businesses, channelled through SE, HIE and Scotland Food and Drink. In other words, the EAFRD money should support genuine bottom-up rural development.

#### **Question 25**

*Selection criteria such as those listed above should apply to that support?*

Yes/No/No opinion.

- Contribution to the Scottish Government's overall strategies for economic development and the rural economy. – **Yes**
- Making a contribution to national policies for food and drink. – **Yes**
- Assisting the Scottish Government with its wider social policies – such as supporting or encouraging healthier eating through the provision of greater and healthier food-choices for consumers. – **Yes**
- Supporting export targets for food and drink sectors. This could include providing increased funding to projects with a strong export focus/developing new markets. - **No**

Where we support the selection criteria, on condition that these are aligned to our answer to Question 24 and the following. RSPB Scotland recommends that the selection criteria includes support for food and drink sectors and businesses which produce or promote environmentally friendly food and drink products or processing. We also recommend selection criteria be included which encourage businesses to lower their carbon footprints.

#### **Question 26**

*Steps should be taken to streamline processes for food companies including a one stop shop for public support?*

**Yes**/No/No opinion

Yes – BUT, as above, small business must be the beneficiaries.

#### **Question 27**

*How would you rate your broad satisfaction with the proposals for Food and Drink support?*

Very satisfied

Quite satisfied

**Neither satisfied nor dissatisfied**

Quite dissatisfied

Very dissatisfied

## **SECTION 14 – LEADER**

### **Question 28**

*How would you rate your broad satisfaction with the proposals for LEADER?*

Very satisfied

**Quite satisfied**

Neither satisfied nor dissatisfied

Quite dissatisfied

Very dissatisfied

RSPB Scotland welcomes efforts to tackle LEADER process issues.

We support the proposal that LEADER contributes to community action on climate change and we would like to see this include increasing community resilience and adaptability to climate impacts. We also warmly welcome LEADER enhancing natural/cultural heritage and recommend that this scheme makes links with spending and projects in other schemes, especially the Agri-Environment-Climate scheme.

We do not agree that there ‘needs to be a focus, above all, on sustainable economic growth’ and do not agree with it as a concept. We recognise sustainable development as a key national aim. Much of our work, previously funded by LEADER has delivered more strongly against social needs such as improving physical and mental health through providing opportunities to be active outdoors for all members of the community. We deliver outdoor learning and habitat conservation which is vital for the future of our environment and wildlife but doesn’t necessarily directly impact on economic growth. We, and many other applicants, would have difficulty providing evidence in our applications that we could contribute to ‘sustainable economic growth’.

## **SECTION 15 – KNOWLEDGE TRANSFER & INNOVATION FUND (KTIF)**

### **Question 29**

*Do you agree with the range of options being included within KTIF scheme?*

**Yes**/No/No opinion.

- Skills development - **YES**
- Vocational training - **YES**
- Monitor farms - **YES**
- Setting up an EIP network – **No opinion**

### **Question 30**

*How would you rate your broad satisfaction with the proposals for KTIF?*

Very satisfied

**Quite satisfied**

Neither satisfied nor dissatisfied

Quite dissatisfied

Very dissatisfied

We believe that there is great scope to use the KTIF fund to transfer knowledge and innovate around environmental issues and helping farmers to improve environmental performance. KTIF needs to work to help farming become more progressive – more market orientated and more environmentally responsible.

RSPB Scotland recommends that the KTIF be used to increase awareness, knowledge and training in environmental protection and enhancement in line with SRDP objectives. For example, this could be a key mechanism to develop and disseminate best practice around adaption to climate change. We recommend that monitor farms must do more to include environmental protection and enhancement in their monitoring and Knowledge Transfer.

We believe the 'statement of need' in paragraph 314 as inadequate as it does not describe the type of knowledge that the analysis identified as being needed. Rather it identified the type of tools needed.

## **SECTION 16 - ADVISORY SERVICE**

### **Question 31**

*How would you rate your broad satisfaction with the proposals for the Advisory Service?*

Very satisfied

Quite satisfied

Neither satisfied nor dissatisfied

**Quite dissatisfied**

Very dissatisfied

We see advice as a key element of maximising value for money from the Agri-environment-climate scheme, and the Forestry Grants Scheme. RSPB recommends that the advisory service includes as a priority support for creating, restoring and maintaining priority habitats and species, and for applicants aiming to protect and enhance wider biodiversity.

RSPB Scotland welcomes the proposed structure for the advisory service – especially the inclusion of 1 to 1 advice to help farmers and crofters maximise the benefits from biodiversity-focussed options.

Unfortunately, we are dissatisfied because we do not believe that £20m will be sufficient to cover existing advisory commitments and the new advisory elements in the proposals. **We recommend that £40-50m is needed over the life of the SRDP to more adequately provide a quality advisory service.**

## **SECTION 17 – SCOTTISH RURAL NETWORK**

### **Question 32**

*Do you think the tasks set out above are the most appropriate ways for the SRN [Scottish Rural Network] to add value to the implementation of the SRDP?*

- SRN website – **Yes**
- Gathering of good programme examples – **Yes**
- Disseminating information to the public – **Yes**
- Organisation of events – **Yes**

*Are there other activities or services you would like to see the SRN provide?*

We welcome the proposed development of the SRN especially to improve the implementation of the SRDP and specifically the Agri-Environment-Climate scheme.

### **Question 33**

*Do you agree with the proposal to establish thematic working groups as an approach to supporting the Rural Development Programme priorities?*

**Yes**/No/No opinion

We welcome the thematic working group approach and recommend that it includes an Environment Theme as a place to discuss the Agri-Environment-Climate scheme.

### **Question 34**

*How would you rate your broad satisfaction with the proposals for the Scottish National Rural Network?*

Very satisfied

**Quite satisfied**

Neither satisfied nor dissatisfied

Quite dissatisfied

Very dissatisfied

## **SECTION 18 - COMMUNICATIONS**

### **Question 35**

*How would you rate your broad satisfaction with the proposals for communicating the new Scotland Rural Development Programme?*

Very satisfied

**Quite satisfied**

Neither satisfied nor dissatisfied

Quite dissatisfied

Very dissatisfied

## **SECTION 19 – MONITORING & EVALUATION**

### **Question 36**

*We would welcome feedback on the approach outlined in Table 9*

RSPB Scotland is concerned that the Scottish Government must not simply aim to meet the indicators set by the EC. Instead, we recommend, monitoring and evaluation be put in place which also aims to show if the £1.3bn being spent is good value for money and having the intended impact. Furthermore an M&E scheme should be designed to inform the development of future schemes. As we explained in our SRDP Principles document<sup>5</sup> '*Many of the examples where agri-environment management is delivering national recovery of bird populations reveal a history of adaptive improvement of management options and their combinations and targeting, based on evidence accrued from monitoring studies*'. We do not believe that meeting the minimum set of indicators set by the EC will help do this.

We find Table 9 to be vague and therefore difficult to draw strong conclusions. However, we welcome amending existing surveys (row 2) to make them better suited to help with SRDP evaluation. A huge amount depends upon which data sources or commissioned work are intended to be captured by row 3.

### **Question 37**

*Are there any other data sources which could inform the impact of the programme?*

Yes/**No**

### **Question 38**

*We would welcome feedback on the proposed approach to filling the gaps in the data required by the European Commission, outlined in Table 10*

**No comment**

### **Question 39**

*Are there any other gaps that you wish to make us aware of?*

**Yes**/No

RSPB Scotland notes no mention of biodiversity indicators in Table 10. We believe that biodiversity indicators are an important indicator to measure SRDP impact but the existing biodiversity indicators are not sufficient to do this. We therefore recommend that this gap is addressed in the next SRDP.

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<sup>5</sup> [http://www.rspb.org.uk/Images/Principles\\_%20SRDP\\_Development\\_tcm9-312241.pdf](http://www.rspb.org.uk/Images/Principles_%20SRDP_Development_tcm9-312241.pdf)

**Question 40**

*Are there any other data sources which could help us fill the data gaps?*

**Yes/No**

A more detailed discussion of appropriate data needs to adequately evaluate biodiversity impact of the SRDP is needed with environmental NGOs including a discussion of available datasets.

**SECTION 20 – IMPACT ASSESSMENTS**

**Question 41**

*We would welcome comments on the BRIA [Business & Regulatory Impact Assessment]*

**No comments**

**Question 42**

*We would welcome comments on the EQIA [Equalities Impact Assessment]*

**No comments**