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TACKLING THE NATURE EMERGENCY: CONSULTATION ON SCOTLAND'S STRATEGIC FRAMEWORK FOR BIODIVERSITY

EXECUTIVE SUMMARY

Introduction

1. NFU Scotland (NFUS) is the leading agricultural organisation in Scotland, representing more than 9,000 farmers, growers, and crofters.
2. Agriculture is the lynchpin of rural Scotland and is an important part of Scotland's booming food and drink industry. Scottish agriculture generates a gross output of £3.3 billion annually.
3. The farming and crofting sector is committed to sustainable food production, enhancing biodiversity and helping to tackle climate change.
4. Our response to this consultation is based on initial discussions with our membership, however, more work must be done to fully assess the impacts on our membership.
5. We are also mindful that the Agriculture & Rural Communities (Scotland) Bill (the Agriculture Bill) is currently making its way through the Scottish Parliament, which will have an impact on the delivery on the aims set out in this consultation.
6. Overall, we need an adaptive and flexible approach to future agricultural policy in order to deliver for food production, rural communities, climate, the environment and nature restoration.

7. It is imperative that the finer details of the actions set out in the delivery plan are co-designed with the industry over the coming months and years. We believe farmers, crofters and land managers should be an integral part of this process.

Key Points of Our Response

5-Year Delivery Plan

8. We agree with the ambition of many of the actions in the Delivery Plan, but need more detail on:
 - 8.1. What they will look like in practice and how they will be SMART.
 - 8.2. For some actions with targets, what that will mean for active farming businesses.
 - 8.3. What funding will be allocated to each action, and from which budget.
 - 8.4. Who is responsible for leading on each action, to ensure it is achieved.
 - 8.5. The timelines for each action – not just the target date but the pathway of how we get there.
 - 8.6. How actions will work with other policies, strategies, and commitments.
9. Going forward we would like to ensure that:
 - 9.1. We work closely with Scottish Government and NatureScot to provide input on the level of detail set out above, to ensure these actions work alongside sustainable farming businesses.
 - 9.2. Biodiversity policy is mainstreamed and integrated across Government, but that the outcomes/objectives of the Agriculture Bill should take precedence over other strategies, policies and legislation concerning the industry.
 - 9.3. There is further direction and advice on biodiversity management and best practice for our industry. Our members are ready and willing to explore new ways of doing things that are suitable to their individual farm or croft.
 - 9.4. In pursuing the aims of the Strategic Framework for Biodiversity, Scotland's farmers and crofters are recognised for the work they do – and have been doing for many years – for nature and biodiversity.

9.5. NatureScot and Scottish Government should improve their communications to show that farmers are part of the solution and not the problem of biodiversity loss.

Statutory Targets for Nature Restoration

10. We have concerns about the principle and unintended consequences of placing targets for nature on a statutory footing. This is because of the complexity of doing so and the fear that pursuing targets can be counterproductive.

11. In saying this, we accept that this is the approach the Scottish Government is taking. The forthcoming Bill should provide a high-level framework, with the detail coming through secondary legislation. We do not believe this Bill should be the place for setting specific targets or prescriptive outcomes, but setting the vision and enabling powers for what intends to be achieved.

12. Other key points on statutory targets include:

12.1. The best way to achieve the desired results is to focus on implementing best practice, and then monitoring and evaluating progress on an ongoing basis.

12.2. That an Independent Review Body is essential to ensure the Government meets its statutory target(s). But this must be robust and independent.

12.3. Changes to statutory targets should be subject to the super-affirmative procedure. This would allow parliamentary scrutiny of proposed changes.

12.4. To achieve the targets that will come through the Natural Environment Bill, and for the Agriculture Bill to achieve its four outcomes, it must be underpinned by a multiannual ringfenced funding commitment.

12.5. We believe 80% of the agriculture and rural economy budget should be allocated in Tiers 1 and 2. This will avoid a cliff edge for farmers as they transition to a new future support scheme, while also allowing them to play a significant role in reversing the climate and nature crisis.

National Parks

13. NFUS's position on National Parks is clear. Food production and farming is integral to Scotland's rural economy, and this should not be forgotten or ignored when it comes to the creation of National Parks.
14. Many of our members do not feel that the two existing parks have made a positive contribution to farming and are therefore sceptical about the creation of further National Parks. For a new park to be successful, meaningful and positive involvement of the local community at each stage of the process is key.
15. While we recognise the value of natural and cultural heritage to an area and that protecting, restoring and enhancing biodiversity is undoubtedly important, our members are looking for reassurance that the priorities of residents, businesses, and farming communities will not be disregarded.
16. We seek reassurance and a commitment that any new National Park or amendments to the Act should work with farmers and crofters to ensure there are no adverse impacts on the important role of food production, the local community, and landscape management.

Impact Assessments – Part A and B

17. Due to timescales and capacity, we have not been able to work through the environmental, islands, socioeconomic, or business impacts in thorough detail.