RURAL AFFAIRS AND ENVIRONMENT COMMITTEE

FUTURE OF AGRICULTURAL SUPPORT IN SCOTLAND

WRITTEN SUBMISSION FROM THE CROFTERS COMMISSION

The Crofters Commission wishes to submit comments to the Rural Affairs and Environment Committee on the recommendations of the Pack Inquiry into the Future For Agricultural Support In Scotland. We regard the Pack report as extremely important, and a very solid piece of work which must now gain serious consideration, as we move towards a CAP review, whenever it takes place, which is likely to require serious change in how support operates in Scotland. The Crofters Commission would wish to be involved in the work which is required to test its hypotheses.

The Crofters Commission broadly supports the recommendations made by the Committee Of Inquiry and would seek to have an input prior to implementation and to the crucial ongoing discussions of aspects of the report, as crofting has many facets which can contribute in addressing the global challenges highlighted in the report, and in discussion of which the Commission has a great deal to offer

In relation to specific recommendations the Crofters Commission, assuming future engagement which will permit greater detail, has the following comments to make:

Delivery mechanism of support through area payment related to activity

The Crofters Commission agrees with this recommendation and its link to activity, but wish to ensure where there is extensive grazing by livestock due to the land capability this is duly recognised and therefore suggest a minimum stocking density of between 0.03LUs - 0.06 LUs as a measure of activity.

Delivery mechanism of support through a cattle headage scheme, revised calf scheme and a new lamb scheme

A revised calf scheme with higher payment rates for the smaller producer will aid the retention and introduction of cattle in the more remote disadvantaged crofting areas which has the dual function of supplying lowland finishers and clean breeding stock. Additionally cattle grazing have been identified by RSPB and other organisations as of significant benefit to wading birds and in meeting environmental aims.

The introduction of lamb headage scheme would also aid the retention of livestock in the vulnerable areas offsetting costs of transportation and feed.

Furthermore both these schemes could possibly start addressing the issue of land abandonment if the detail in the schemes were right.

Top Up Fund

This concept is supported as a mechanism for the delivery of support linked with public benefit. However the suggested access to the fund of using Standard Labour Requirements per business has to be carefully evaluated to ensure smaller extensive units are not disadvantaged. We would stress the need urgently to examine the way Standard Labour Units are calculated, and to allow for working practices in crofting and general hill farming areas

New Vulnerable Area for LFASS

The creation of the Vulnerable Area will direct support to the most disadvantaged areas supporting agricultural land activity and therefore enhancing the environment through the active land management. We believe this would be of enormous benefit, and is the single most important proposal in the Pack Report, given that it would begin to permit a level playing field for the very fragile areas of Scotland, including the Scottish islands and large parts of the Highlands. Such a possibility has never existed in the past, as evidenced by the extreme inequity in distribution of support payments

Implementation of recommendations in one step allowing new entrants to access support

New entrants have been disadvantaged in their inability to access pillar 1 direct support under the current SFP scheme as it is based on historic data and the only way to get this support was to purchase SFP entitlements. The Crofters Commission fully supports the one step approach to allow new entrants access to future scheme, based on activity, and assumes that, under any future support scheme, tradable entitlement will vanish

Additionally it is vital that resources are made available to ensure any future support schemes are designed and constructed ahead of implementation.

Furthermore to allow business to make informed decisions a clear message of direction is required.

Crofters Commission February 2011