



The Nature Friendly Farming Network-“the NFFN”-a farmer and crofter-led group which champions nature-friendly farming across Scotland and the UK ([www.nffn.org.uk](http://www.nffn.org.uk)), welcomes the opportunity to respond to this important consultation paper and we set out our broad response below. Members of its Scottish Steering Group would be happy to expand on aspects of the response through further engagement.

The NFFN believes that nature friendly farming is both better for nature and the most productive and sustainable way of getting food from our land. The many farmers and crofters across Scotland who are helping wildlife to flourish on their holdings should be better supported and rewarded for their work, and we support the proposals outlined in the consultation paper which are directed to that end.

The NFFN agrees that it is time for change and supports the various commitments to ensuring the maintenance of environmental standards and not compromising these standards and objectives through the themes of stability, simplicity (a particular priority for our members), sustainability and security.

We welcome the consultation on a transition period but feel that Scottish Government must urgently consult on and communicate the long term ambition so that the transition period can be used most effectively and to convey certainty to all land managers. We support the commitment to use the transition to allow farmers and crofters to ‘enhance their role as stewards of our natural environment and embrace an integrated approach to land use which seeks to deliver multiple benefits from the land and the commitment to a more supportive, outcome and performance based approach’ (p.8). Trust in land managers is critical to success. There is good evidence that payments based on outcomes can improve environmental benefits and increase farmer and crofter engagement. However, results are not always within the control of the land manager, especially with the Scottish weather and could present a higher risk to them. Payment for results could be used to top up payment for management actions. We suggest trialling some of these outcome-based approaches as part of the transition period.

The transition period should be used to develop new ideas, with the money freed up by capping payments (an approach very much supported) on a scheme by scheme basis used to trial new approaches that put the environment at the heart. Our members come from across Scotland from Shetland to the Borders and we all have different needs; a new approach that recognises regional and local priorities, needs and differences would be welcome. We would also support trialling management planning on the farm, which should include a look at both environmental benefits and business efficiency, link to regional needs, and trialling options for collaborative approaches. Members of the NFFN are keen and offer their businesses as participants in these trials.

In the longer term, we believe that public engagement should be central to future policy, and we support the breadth of stakeholders identified in section 4 on page 4-recognising the broad stake of rural interests. We should aim to improve public understanding about food, farming and the environment, and public access should be encouraged, including access to information about the public money received by farmers and crofters in their area, their aims and objectives, the projects they are involved in and what is expected of them in return for payments. An online portal or hub

could present this information to improve the transparency of agriculture, which would help to make the link between public money, public goods and the public itself.

We wholeheartedly agree with the greater role for advice and knowledge transfer in areas such as productivity improvement; understanding environmental challenges; improving habitats; and improving efficiency of resource use. We would like to see an expanded advisory service, where every holding can more easily access 1-1 advice more frequently.

The inspections and compliance process should be much more supportive, with a 2 or 3 step process to inspections, allowing a chance to comply with identified issues, with independent advice available and enforcement proportionate to issue. Integrating monitoring into inspections would improve performance and outcomes and set a more positive tone, with land managers being able to note the results they have achieved as part of their land stewardship and as outputs of land management.

Future public sector investment should embrace shorter supply chains in remoter parts of Scotland, supporting cooperation in smaller and medium sized farms and crofts, supporting machinery rings through collaborative capital where access to specialised machinery is an issue and supporting the goals of the Good Food Nation Bill. There is a crying need for simplification in the application process for so many of these well-intentioned but hideously complicated schemes.

As might be expected, the NFFN has a particular interest in and experience of AEC schemes and can offer a detailed paper on the way forward and what a new scheme should look like, embracing points such as:

- 1) Future schemes must make it simple for farmers and crofters to do the right things for nature.
- 2) Other investments (for example from Scottish Water or developers) could help pay for some environmental schemes, such as water quality; it might be possible to develop a scheme along the lines of the Woodland Carbon Code for environmental benefits which could be paid for, in effect, by corporate businesses; accreditation schemes like FASL could ensure that food produced to high environmental standards is recognized in the market.
- 3) This is an opportunity to both simplify schemes and ensure they deliver more. There should be an intuitive and straightforward application process and clear guidance to the applicant to identify the range of benefits to their business and the environment to encourage buy in and recognition of what is being achieved.
- 4) Future schemes should aim to work at a landscape scale, should pay farmers and crofters for providing clearly defined outcomes not provided by the market or regulation and based on the best evidence of what works and targeted to local priorities.
- 5) Payment for advice should come in part from the farmer but also be supported by government where it helps farmers achieve public benefits.

Please let us know if receipt of the much more detailed paper would help your deliberations at this stage and we will arrange to have it submitted.