

Supporting agroecological transition in Scotland

Food, Farming and Countryside Commission – Scottish Government Agriculture Bill consultation response, submitted 2nd December 2022



Summary

- The Scottish Government has stated it wants transformational change to become a world leader in sustainable and regenerative agriculture. We set out that widespread transition to agroecological farming by 2030 can help deliver their ambition.
- We called for a Scottish Agroecology Working Group to be established to bring stakeholders around the table to develop agroecologically based farming support schemes in Scotland.
- Currently, it is not clear from the proposals set out, that the level of transformational change that is needed, will be facilitated by the proposals in the consultation. We called for the bill to express the outcomes that payment schemes need to achieve, which should include the transition to agroecological farming to help meet GHG emission targets, provide healthier food for the people of Scotland, protect and enhance biodiversity, and create more resilient and sustainable rural communities.

Overview of timings

2016	Brexit referendum
2020	Agriculture (Retained EU Law and Data) (Scotland) Act 2020

2021	Scottish Government Agricultural Transition in Scotland consultation
2022	Scottish Government's statement on: The next step in delivering our vision for Scotland as a leader in sustainable and regenerative farming
2022	Scottish Government Agriculture Bill consultation
2022	Ministerial statement on consultation and new scheme timelines
2023	Agriculture Bill laid before parliament (anticipated ca. Sept to Nov.)
2026	New powers from the Agriculture Bill launched in payment schemes

Scottish Government objectives and agroecological farming

We believe transformational change should come from a widespread transition to agroecological farming by 2030 and a key recommendation in our 2019 reports^{2,3} is a ten-year transition plan to agroecological farming in the UK.

Agroecology can help deliver many of the objectives of the Scottish Government's agricultural, biodiversity, climate change and rural development ambitions. Research commissioned by FFCC demonstrates that many farmers and crofters in Scotland have already adopted agroecological practices on their land⁴. We learned from our research that agroecological approaches provide a broad pathway to sustainability in agriculture and are being practiced by many Scottish farmers and crofters, largely without financial subsidies. By targeting financial support to the adoption of agroecological approaches, land managers can be supported in financially de-risking the transition they are expected to make in achieving the Scottish Government's sustainable and regenerative agriculture vision.

The acceleration of the climate, biodiversity and health crises now require faster and more widespread change. To achieve this, agricultural, horticultural, supply chain and consumer practices need to change. Agroecological farming practices offer methods to

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address these crises and sit firmly within the Scottish Government's vision for transformational change.

A Scottish Agroecology Working Group

The consultation document lacked detail on what the payment schemes would look like and how they would work. We called for the establishment of a Scottish Agroecology Working Group in our 2021 response to the Scottish Government consultation on Agricultural Transition in Scotland. We have reiterated that call in our latest consultation response because it would bring together stakeholders from farmers, crofters, growers, industry leaders, farming organisations, universities and government officials and offer a way to agree on solid foundations for embedding sustainable and regenerative practices in the payment scheme design. Only by embedding agroecological and nature-friendly farming practices throughout the payment schemes, can the scale of the transition needed become embedded.

More detail on the proposals

Our response has repeated widespread calls for more detailed proposals to be brought forward, and for continued ongoing dialogue on the details of the payment schemes as they are developed. We also highlighted a technical contradiction in the structure of the proposed bill. The bill is presented as framework legislation to provide powers for payments to land managers (amongst other things), but the proposed four-tier system model would set the direct and indirect payment model in primary legislation which means it is less flexible for future adaptations. This may well be a suitable model but given the lack of detail about how payment schemes will be designed, it is hard to support it outright.

In our view, a framework bill would be better if it set out to describe which outcomes the primary legislation intends to achieve (along with core requirements on how it should be governed and scrutinised), and detailed what measures will facilitate those outcomes in the secondary legislation. In that approach, the four-

tier model would be better placed in secondary legislation so that future adaption to government policy is more agile and less cumbersome. Secondary legislation would then be scrutinised against the framework objectives in the primary legislation.

We have suggested that the primary legislation outcomes should include the transition to agroecological farming to help meet GHG emission targets, provide healthier food for the people of Scotland, protect and enhance biodiversity, and create more resilient and sustainable rural communities.

Specific suggestion on data collection and open access protocols to support transition

The Scottish Government currently has the Preparing for Sustainable Farming (PSF) test programme underway for carbon audits and soil sampling and analysis. This is important work, not least because it is likely to form part of the conditions for area-based payments in the future. Currently, however, there are no baseline protocols on how this data collection will be used and built upon in the future.

Our response highlighted that transparency in the distribution of public funds is required to demonstrate that government policy and objectives are being delivered. Data collection and open access should be built into systems to enable open public, academic and commercial analysis of funding and outcomes.

Specifically, we have proposed that:

- government supported open data protocols should form the basis of ecosystem and carbon auditing; and
- the baseline data should be centrally aggregated and openly available to unlock its public benefit, particularly where public funds have been provided for land management and area payments (open data protocols provide the standard and help enable this).

The use of open data protocols will:

- ensure comprehensive data is available for assessment of outcomes;

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- inform continued scientific research and advice;
- support whole farm and/or area plans; and
- stimulate commercial innovation.

References

1. Scottish Government. 2022. *Agriculture Bill consultation*. <https://www.gov.scot/publications/delivering-vision-scottish-agriculture-proposals-new-agriculture-bill/>
2. Food, Farming and Countryside Commission. 2019. *Our Future in the Land*. <https://ffcc.co.uk/assets/downloads/FFCC-Our-Future-in-the-Land.pdf>
3. Food, Farming and Countryside Commission. 2019. *Scotland Field Guide for the Future*. <https://ffcc.co.uk/library/scotland-field-guide-for-the-future>
4. Lozada, L.M. and Karley, A. 2022. *The adoption of agroecological principles in Scottish farming and their contribution towards agricultural sustainability and resilience*. SEFARI and James Hutton Institute. <https://sefari.scot/document/the-adoption-of-agroecological-principles-in-scottish-farming-and-their-contribution>
- 5.

FFCC's full response to the consultation will be published on the Scottish Government consultation hub as part of the analysis of consultation responses.