

Response ID ANON-2DNM-9C88-W

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Information about you

Please complete the following contact details;

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The Scottish Beef Association

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N/A

Publish this response

Are you a;

NGO

What are the main enterprise(s) on your holding? (select up to two)

No holding

We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Yes

1) Basic Payments

1 The Scottish Government proposes that Payment Regions should be based on historical land type designations. Do you agree?

a) Yes;

2 The Scottish Government proposes that having two Payment Regions will allow sufficient account to be taken as regards to the difference between land of differing quality without causing undue complexity for farmers and officials. Do you agree?

b) No;

3 The Scottish Government proposes that Region 1 should be arable, temporary grass and permanent grassland and Region 2 should be rough grazing. Do you agree?

b) No;

4 In considering future Payment Regions, please rank your top 3 options in order of preference (1 = first priority, 2 = second priority etc.).

a) Proposed Scottish Government approach of 2 regions based on land type;:

2

b) 3 regions based on land type;:

1

c) 2 regions based on LCA;:

d) 3 regions based on LCA;:

3

e) Single payment region;:

f) Other type of payment region designation;:

g) No view.:

5 The Scottish Government thinks the final area rate for mandatory direct payments (i.e. Basic Payments plus Greening Payments) on land in the Rough Grazing Payment Region should be between €20-25/ha. Do you:

d) Not support the proposal for other reasons;

6 How quickly should we move to average payment rates in a region?

d) Irish tunnel so that the range of payment entitlement values is narrowed but does not reach the flat area rate by 2019;

7 How would you prioritise the following factors which we need to take into account in deciding how to move to area based payments (1 = first priority, 4 = lowest priority etc.)

a) Simplicity;:

3

b) Clear and accurate forecasts of future payments to each farmer;:

2

c) Allowing farmers time to adjust to change;:

1

d) Avoid undue delay to those seeking fairer payments;:

e) No view.:

8 The Scottish Government proposes that the value of future Basic Payments be calculated based on the value of the SFP entitlements held by farmers in 2014 rather than on the amount of SFP paid to a farmer in 2014. Do you agree?

a) Yes;

9 The Scottish Government proposes to keep the minimum threshold at the present level, so that control of at least 3 hectares of eligible land would be needed to claim future direct payments. Do you agree?

a) Agree – the minimum threshold should remain at 3 hectares;

10 The Scottish Government is not minded to add further business types to the negative list, to be automatically excluded from payments unless they can demonstrate that they are active farmers. Do you agree?

a) Yes;

11 If the detailed rules allow, the Scottish Government intends to require land that is naturally in a state suitable for grazing to have a minimum stocking density in the region of 0.05LU/ha (i.e. roughly 1 sheep on 3 hectares) with derogations, for future direct payments. Do you agree?

d) Disagree for some other reason;

12 If we are not able to use a minimum stocking density requirement to meet the minimum activity requirement, should we instead require farmers to demonstrate that they are “active” farmers by having plans to ensure a structured flock or herd, for example, plans showing a replacement strategy?

a) Yes;

13 What should we be aiming for when considering an appropriate minimum activity requirement –please rank your top 3 options in order of preference (1 = first priority, 2 = second priority etc.).

a) Stop slipper farming even if this imposes burdens on active farmers;:

2

b) Balance the wish to stop slipper farming against the likely burden on genuine active farmers;:

1

c) Do the minimum necessary to meet European requirements even if this means slipper farming continues in Scotland;:

d) Workable and easy to understand rules for farmers;:

3

e) Appropriate procedures for environmental sensitive land;:

f) No view.:

14 Comment Box on the minimum activity requirement (200 word maximum)

Comment Box on the minimum activity requirement (200 word maximum):

Direct payments should only be made to active farmers who are contributing to the national output of the agricultural industry, which includes the economic, environmental and social aspects. We see the minimum stocking density requirement and the use of the reduction coefficient as separate but closely related items within this process.

The SBA believes that a level of financial risk relative to the Basic Payment should be considered as a factor in determining whether a producer meets the "active farming" criteria and therefore qualifies for support payments.

15 The Scottish Government does not propose to use the reduction coefficient that can be applied when payment entitlements are allocated. Do you agree?

b) No;

16 The Scottish Government does not propose to use the reduction coefficient that can be applied when payment entitlements are activated. Do you agree?

a) Yes;

17 Which one of the following options for degressive reductions do you prefer?

a) Apply the mandatory 5% degressivity when a business's Basic Payments are greater than €150,000;

18 The Scottish Government proposes to use the windfall provision in cases where the termination or ending of a lease leads to a windfall gain for the farmer concerned. Do you agree?

b) No;

19 The Scottish Government thinks that Scotland should take full advantage of a siphon on sales of entitlements without land. Do you agree?

a) Yes;

2) Environmental measures – Greening, Equivalence and GAEC

20 The Scottish Government thinks that the Greening payment should be regionalised and paid on an area basis. Do you agree?

a) Agree the Greening payment should be regionalised, with each region having its own Greening payment rate;

21 Do you think the Scottish Government should use the option to designate further environmentally sensitive permanent grassland areas outwith Natura sites?

b) No, because other regulations already protect these areas;

22 Do you think that the Scottish Government should continue to monitor the area of permanent grass at national level?

a) Yes;

23 Which of the following areas do you think we should consider as being part of EFA in Scotland (bearing in mind the measurement and verification issues for landscape features):

a) Fallow:

Yes

b) Buffer strips:

Yes

c) Landscape features:

Yes

d) Agro-forestry supported under SRDP:

Yes

e) Uncultivated strips along forest edges:

Yes

f) Short rotation coppice:

Yes

g) Afforested areas supported under SRDP:

Yes

h) Catch crops or green cover:

Yes

i) Nitrogen fixing crops.:

Yes

j) No view.:

Not Answered

24 Do you think we should consider the option to implement the EFA requirement at regional level?

a) Yes;

25 Do you think we should consider the option to allow groups of farmers to implement the EFA requirement collectively?

a) Yes;

26 We would like your views on whether optional weighting and conversion factors should be used when calculating the area of EFA on holdings?

g) No view.

27 Should we consider using the equivalence option in Scotland and if so how?

e) No view.

28 If adopted, should an equivalent certification scheme include:

d) No view.

29 If we had an equivalent crop diversification requirement should it include:

a) Equivalent crop diversification requirement set out above;:

Not Answered

b) Crop rotation requirement set out above;:

Not Answered

c) Winter soil cover requirement set out above;:

Not Answered

d) Catch crops requirement set out above;:

Not Answered

e) None of these. The crop diversification requirement should be delivered through the standard Greening requirement;:

Not Answered

f) No view.:

No view

30 As far as the Greening permanent grassland requirement is concerned how do you think it should be implemented in Scotland?

a) Through the standard Greening Permanent grassland measure;

31 If we had an equivalent permanent grassland requirement in a certification scheme, which equivalent practice/s do you think should be included on meadows and pastures?

a) Cutting regime or appropriate mowing (specifying dates, methods and limits);:

Not Answered

b) Maintenance of landscape features on permanent grassland and control of scrub;:

Not Answered

c) Specified grass varieties and/or seeding regime for renewal depending on the grassland type, with no destruction of high nature value grassland; :

Not Answered

d) Evacuation of forage or hay;:

Not Answered

e) Appropriate management for steep slopes;:

Not Answered

f) Fertiliser regime (including nutrient efficiency measures);:

Not Answered

g) Pesticide restrictions;:

Not Answered

h) None of these. The permanent grassland requirement should be delivered through standard Greening requirement;:

Not Answered

i) No view.:

No view

32 If we had an equivalent permanent grassland requirement in a certification scheme, which equivalent practice/s you think should be included on extensive grazing systems?

a) Extensive grazing (specifying timing and maximum stocking density);:

Not Answered

b) Shepherding or mountain pastoralism;:

Not Answered

c) Using local or traditional breeds for grazing the permanent grassland;:

Not Answered

d) None of these. The permanent grassland requirement should be delivered through the standard Greening requirement;:

Not Answered

e) No view.:

No view

33 As far as the EFA requirement is concerned how do you think it should be implemented in Scotland?

a) Through the standard Greening EFA requirement;

34 If we had an equivalent EFA requirement which areas do you think should be able to count towards this requirement?

a) Ecological set-aside;:

Not Answered

b) "Buffer zones" e.g. along hedgerows and water courses;:

Not Answered

c) Management of uncultivated buffer strips and field margins;:

Not Answered

d) Borders, in-field strips and patches managed for wildlife or specific fauna;:

Not Answered

e) Management of landscape features;:

Not Answered

f) Keeping arable peaty or wet soils under grass:

Not Answered

g) Production on arable land with no use of fertiliser and/or pesticides, no irrigation and not sown with the same crop two years in a row and on a fixed place;:

Not Answered

h) Conversion of arable land into extensively managed permanent grassland;:

Not Answered

i) None of these. EFA should be delivered through the standard Greening EFA requirement;:

Not Answered

j) No view.:

No view

35 The Scottish Government thinks that GAEC 1 – the requirement to establish buffer strips along water courses – should include a ban on cultivation within 2m of surface water or wetland? Which of the following options do you prefer? Tick one.

b) A ban on cultivation only within 2m of a water course;

36 The Scottish Government does not intend to introduce new requirements into GAECs 2, 3, 4 and 5. Do you agree?

a) Yes;

37 The Scottish Government does not intend to introduce new requirements other than the compulsory ban on the burning arable stubble as set out by Europe. Do you agree?

a) Yes;

38 In relation to hedges, which of the following options for GAEC 7 “Retention of landscape features” do you prefer? Tick one;

c) No ban on cultivation adjacent to a hedge;

39 In relation to dry stone walls, which of the following options for GAEC 7 do you prefer? Tick one

c) No ban on cultivation adjacent to a dry stone wall;

40 The Scottish Government does not intend to use the option to allow GAEC 7 to require farmers to tackle the spread of invasive species (click all that are relevant).

a) Agree GAEC 7 should not be expanded to include invasive species;:

Yes

b) Disagree, should extend GAEC 7 to include *Rhododendron ponticum*;:

Not Answered

c) Disagree, should extend GAEC 7 to include giant hogweed (*Heracleum mantegazzianum*);:

Not Answered

d) Disagree, should extend GAEC 7 to include Japanese knotweed (*Fallopia japonica*);:

Not Answered

e) Disagree, should extend GAEC 7 to include Himalayan balsam (*Impatiens glandulifera*);:

Not Answered

f) None of the above;:

Not Answered

g) No view.:

Not Answered

41 Comment box for comments on Greening Measures, Equivalence and GEAC (500 words maximum)

Q41:

No comment

3) Other Direct Payments

42 What level of VCS do you think should go to a future beef scheme?

e) 8%

43 The Scottish Government thinks that future VCS should be allocated to give 3 x the rate for the first 10 calves, 2 x the rate for calves 11-50 and 1 x rate for more than 50 calves. Do you agree?

c) No should decrease the front loading so that medium sized herds benefit more;

44 Should any future coupled support scheme for beef allow payments on beef calves from dairy cows i.e. 50+% beef genetics?

c) No because it would dilute payments to "beef" calves when we need to strengthen them and economic output from dairy relatively high;

45 Do you agree that we should not consider coupled support for lambs until there is a statutory database in place that identifies individual animals?

a) Yes;

46 If a coupled support scheme for sheep was introduced what proportion of VCS funding should be used?

e) Use all 8% VCS for beef;

47 Should we explore with the other UK regions whether it could be possible to use more than 8% of the Scottish ceiling for voluntary coupled support?

a) Yes;

48 Should Scotland use the Redistributive Payment option?

b) No;

49 The Scottish Government proposes to pay Young Farmer top ups on the first 54 ha using Option (1) (top up payments calculated at 25% of average entitlement value). Do you agree?

a) Yes

50 Given that the majority of Scotland's small farms are grassland and livestock based, the Scottish Government does not propose introducing a Small Farmers Scheme. Do you agree?

a) Yes;

51 The Scottish Government does not propose to use the Pillar 1 ANC option and will continue to provide support for Less Favoured Areas under Pillar 2. Do you agree?

a) Yes;

52 In Year 1, the Scottish Government proposes to use the National Reserve to help existing new entrants from Day 1. Do you agree?

a) Yes;

53 The Scottish Government intends to ensure that future new entrants are able to access the National Reserve for entitlements and may use the option to perform further top slices to ensure there are adequate funds for this purpose. Do you agree?

a) Yes;

4) Proposed final package

54 Please score the following aspects of the proposed package for Basic Payments (1= Strong agreement that feature should be in final package, 2 = Agreement, 3 = Weak agreement and 4 = Disagree that feature should be in final package).

a)::

4

b)::

4

c)::

4

d)::

4

e)::

2

f)::

1

g)::

1

h)::

1

i)::

4

55 Please score the following possible aspects of the future package (1= Strong agreement that feature should be in final package, 2 = Agreement, 3 = Weak agreement and 4= Disagree that feature should be in final package).

a):

4

b):

1

c):

4

56 Final comment box for comments on proposed package as a whole (500 words maximum)

Please provide any comments you have on this section (maximum 300 words):

The Scottish Beef Association (SBA) would like to make some additional comments / qualifying statements relating to our answers of the following questions.

Question 5

We would agree to a direct payment of €20–25/ha in the Rough Grazing Payment Region on the condition that payments are dependent on the implementation of effective measures to limit the excessive levels of support going to vast areas of unproductive RGR. The SBA believe that it is vital that producers should be required to prove activity by either complying with the minimum stocking density or taking a crop from the land in conjunction with the effective implementation of a reduction coefficient.

Question 11

Compliance with the minimum stocking density, along with an alternative option such as taking a crop from the land, should be the basis to qualify for direct payments. We would suggest that a minimum stocking density of 0.15 LU/ha be implemented. However, if the reduction coefficient was to be applied then a lower stocking rate of 0.05LU/Ha could be considered.

Question 15

We regard the use of the reduction coefficient as an essential part of the total package. The reduction coefficient could be applied to poorer land, which is being actively farmed in an extensive manner, to calculate payments.

We suggest the following reduction coefficients are applied: -

- 0.15 for RGR

- 0.30 for TGRS and PGRS

Question 42

In light of developments since the consultation was published and the information intimated to us by the Cabinet Secretary, we would ask for the revised VCS limit of 13% to be used for coupled payments for calves of 75+% beef genetics.

Question 43

We regard the most effective way to avoid discrimination based on herd size would be for a flat rate payment be made for all calves that qualify regardless of herd size.

To reverse the decline in number of the national herd and restore production levels in order to meet market demand for PGI Scotch Beef, we would suggest increased payments for increased numbers of registered calves from one year to the next (balloon payments).

In general terms we would wish to see the following points considered as part of the CAP reform consultation: -

- Direct payments should only be made to active farmers who are contributing to the national output of the agricultural industry, which includes the economic, environmental and social aspects. We see the minimum stocking density requirement and the use of the reduction coefficient as separate but closely related items within this process.
- The SBA believes that a level of financial risk relative to the Basic Payment should be considered as a factor in determining whether a producer meets the "active farming" criteria and therefore qualifies for support payments.
- Full use of coupled payments should be used to help reverse the decline in the national beef herd.