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## Consultation on Less Favoured Area Support Scheme in Scotland (2010-2013)

*The Game & Wildlife Conservation Trust is an independent wildlife conservation charity conducting research into the biology of game species and the flora and fauna that share their habitats. The Trust funds its own research as well as undertaking projects funded by contract and grant-aid from Government and private bodies. Our 60-strong team of researchers has expertise in such areas as ornithology, entomology, biometrics, mammalogy, agronomics and fisheries.*

*Our remit includes educating the public through regular publications, scientific papers, training courses, the media and events. The Trust advises farmers and landowners on improving wildlife habitats and lobbies for agricultural and conservation policies based on science. We act as advisors to Scottish Government and are represented on a number of relevant land management and biodiversity committees.*

### Background

Many of Scotland's most appreciated landscapes and habitats are in remote areas. Though often thought of as natural wilderness ecosystems, almost all the conservation, community and economic benefits that flow from these areas are the result of man's activities. Central to the management of these habitats and the retention of the rare species that rely on them is the grazing by livestock. Maintaining livestock numbers in remote rural areas is increasingly not about food production but about maintaining and enhancing habitats and protecting associated species and economies from parasites and diseases; for example the role sheep have to play in controlling tick abundances is crucial to the health of Scotland's hills.

We are pleased to be able to respond to this consultation on Less Favoured Area Support Scheme which provides a mechanism, alongside Scottish Rural Development Programme's Tier II Land Manager's Options and Tier III Rural Priorities, to promote the maintenance of livestock in the uplands and consequently the environmental and socio-economic benefits.

## 1. What are your views on the use of “mountain area” designation and “specific handicap” designation for islands as outlined in Annex 3?

We support the use of "mountain area" designation and "specific handicap" designation for islands as outlined in Annex 3. Slopes, rainfall, temperature limit the growing season and physical access to hills and islands are restricted, increasing transportation costs and rendering farming increasingly unsustainable in those areas without additional LFASS support. Support for significant areas of both categories is essential as they provide public benefit in terms of valued landscapes, biodiversity, carbon storage and natural flood management maintained to a considerable extent by extensive agriculture. Examples of habitats and species supported are open heather moorland and machair and the wader assemblies associated with each.

## 2. What are your views on the approach to calculating payments set out in Annex 4? Do you have alternative suggestions?

The Scottish Government consultation paper approach is an excellent start. For example we support the tapering arrangement proposed to reduce very large payments to very large holdings (Annexe 4-21). We commend the principle of the tapering which is already in use for LMOs.

We offer the following comments on the advantages and disadvantages section:

### Advantages

- Higher payment rates for poorer quality land are desirable, providing it safeguards it against habitat damage, e.g. deterioration through over or undergrazing.
- Where destocking in parts of Scotland is causing social, economic or environmental damage, resources should be made available to all practicing farmers through the appropriate part of the SRDP. We suggest Tier II Land Management Options are the most appropriate because these are available to all farm businesses for social, environmental and economic benefit delivery. As a consequence Tier II entitlement levels will need to be raised.

### Disadvantages

- Increasing administration and/or complexity must be avoided.
- There is a risk that using MacAulay *Land Capability for Agriculture* information or any other mechanism at too detailed a resolution for LFA classification will cause unrealistic GAEC and other compliance issues. Any classification must provide a simple, transparent re-designation of LFA categories, ideally with only 2 but a maximum of 3 categories.

- With 2 categories maximum each holding may contain some land of both and non-LFA. This is no different to the previous LFA with DA and SDA. This confusion illustrates why this proposal needs simplification.
- In terms of habitat impact, simple stocking rate densities are ineffective unless split into seasonal components; summer - April to September inclusive, and winter – October to March inclusive. We suggest not specifying stocking densities but relying on Single Farm Payment requirements to avoid overgrazing or undergrazing of sensitive habitats.

### 3. What are your views on this rationale and these objectives for LFASS?

As noted in our response to Q2 we support this view of the LFASS scheme and the rationale behind it.

### 4. Would you be in favour of continuing the current interim scheme with no significant changes?

The current interim scheme has advantages –

- i) it is relatively simple
- ii) it works and is understood by farmers and crofters
- iii) it meets existing EU criteria and we presume future EU criteria

### 5. Would you be in favour of continuing the current interim scheme, but with some redistribution of payments? Do you have alternative suggestions?

We support some payment re-distribution within the broad framework of the current scheme as this would retain a core of funding for livestock management while providing increased options without undue compulsion for environmental activities. Our suggestions for how this could enhance delivery of environmental goals through SRDP are outlined in our answer to question 9.

### 6. What are your views on the principle of creating a closer link with livestock-related activity?

We agree there is a vital link between the management of many of Scotland's most cherished habitats and landscapes and 'livestock related activity', further environmental requirements directly linked to LFASS are likely to constrain farming activity and are unlikely to encourage or maintain active agricultural production on the land concerned. Farming activity in the uplands has already produced many of the benefits we currently enjoy and supporting agricultural

activities such as the Scottish suckler cow herds has inherent benefits for habitats as it encourages mixed farming. However, we would welcome those farmers whose agricultural activities are secure having an increased range and availability of options under SRDP-LMOs and RPs.

## 7. What are your views on the approach set out in paragraphs 6.4 - 6.6 on

(i) creating a closer link with livestock-related activity, (ii) helping new entrants and others taking on land that did not attract LFASS in 2006, (iii) re-establishing the cattle-top up link?

The approach proposed appears unnecessarily complex. A simple approach would be to broadly continue the format of the current scheme but with reallocation of funds for environmental activities through LMOs.

## 8. How could delivery of environmental benefits be improved?

We have four recommendations for increasing environmental benefits in the uplands, particularly heather dominated and scrub edge habitats, through reallocation of elements of the second interim LFASS scheme to SRDP-LMO Tier II:

1. Encourage a connection to reduced grazing during the winter months and more intense levels grazing during the spring and summer months with financial support for away-wintering or in-by grazing during the non-growing season.
2. Encourage financial support for tick control schemes, run in conjunction with local veterinarians, to assist in maintaining sheep and cattle health, reduced tick burdens and disease transfer to people, game and wildlife.
3. Ensure rotational strip type muirburn is used to complement grazing by providing fresh new growth and encouraging the distribution of sheep across the hill.
4. Develop mechanisms for short (1-2 months) intense stocking of degraded (over or under grazed) heath dominated vegetation by native cattle breeds during the early summer to stimulate vegetation removal and substrate disturbance.

## 9. What are your views on reallocating a proportion of LFASS money to other measures within the SRDP?

We are supportive of this approach and suggest the following redistributions in funding are made:

- i) Make use of mountain and specific handicap (island, remote community) designations

ii) Introduce/reintroduce LFA and SDA or consider three categories of increasingly difficult conditions and thus three payment rates:

- **Less Favoured**                      LF
  - **Disadvantaged**                    D
  - **Mountain & Island**                MI
- } **Areas**

iii) Substantially increase resources distributed through SRDP – LMOs including individual holding allocations. This has the added benefit of allowing the farmer to choose the most appropriate options for his land and his business. The farmer/land manager should have greater ownership and understanding of his options. This system has the benefit of administration time and cost being small so greater public funding should reach the target.

iv) Provide greater resources for farms within LF, D, SD designations through LMOs and increase the list of options, specifically those outlined in Question 8, to encourage farmers to deliver increased social, economic or environmental benefits.

AAS

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