Introduction

1. NFU Scotland recognises that the Minister for Environment, Michael Russell, launched a consultation paper outlining proposals on 4 November 2008 to generate funding in order to plant more trees as part of plans to increase the area of Scotland covered in woodland by the second half of this century.

2. In the consultation, Scottish Ministers are asking Forestry Commission Scotland (FCS) to work up options to create funds via the national forest estate in the name of tackling climate change, while also safeguarding the important public benefits that the estate generates throughout Scotland.

3. NFU Scotland acknowledges that the consultation relates to legal provisions in the Scottish Climate Change Bill that may help with these aims, such as the potential to give Ministers the power to modify certain functions of FCS. This is not of primary or overriding concern to NFU Scotland.

Summary

4. NFU Scotland has some major concerns that these proposals may well adversely impact on Scottish agriculture if they are given the go ahead. These can be summarised as

- NFU Scotland is extremely concerned by the potential adverse impact that these proposals may have on the future development of many rural areas where farming plays the principal and pivotal role in securing and enhancing a huge range of economic, environmental and social benefits.

- NFU Scotland considers that the final outcome of these proposals, skewing the funding balance within the Scotland Rural Development Programme (SRDP), could have a major impact on the entire Scottish agriculture industry - including upstream input suppliers and downstream processors - and all that it underpins in rural Scotland.

- NFU Scotland doubts very much whether this approach to tackling climate change will achieve anything positive. It is naive in the extreme to think that simply planting more trees on mainly agricultural land, to lock up carbon, will make a significant contribution in addressing what is a global and complex problem.

- Given the uncertain and variable impacts that climate change will have on Scotland, and globally, NFU Scotland considers that a far more
A sophisticated approach to tackling climate change is required - rather than simply expanding tree cover across productive agricultural land.

- NFU Scotland considers that it would be far more effective to divert funding to farm businesses in order that they can take informed and supported decisions so as to adapt agricultural practices and mitigate climate change impacts, and thereby deliver a range of wider rural development benefits as a consequence.

- NFU Scotland considers that agriculture’s function could have an even greater positive impact if the policy environment in which farming and farmers currently operate in were more receptive to agriculture’s primacy in both land use and tackling climate change.

- NFU Scotland believes better integration between currently separate policy themes such as farming and food, forestry, flooding and biodiversity - all of which are linked to land use and require some degree of spatial co-ordination and co-operation across different parcels of land and therefore different farms - must be pursued.

- NFU Scotland considers that there is a real need to avoid overly simple or naive policy approaches to tackling climate change - and the blunt tool of diverting resources to planting trees on good agricultural land falls right into that trap.

- Attention also needs to be paid to designing market mechanisms to promote mitigation - agriculture’s inclusion in an emission trading scheme should be explored.

- In what effectively becomes a land use debate, NFU Scotland firmly believes there must be a focus on preserving and enhancing the benefits delivered by active farming and food production - including those in relation to climate change.

- There is a limit to the uses that any area of land can deliver and the Scottish Government must recognise that if it is to reconcile concurrent policy aims.

Background

5. On 29 January 2008, the Scottish Government launched a consultation on its proposed Scottish Climate Change Bill that sets out a target to reduce emissions by 80% by 2050. It pointed out that the debate has clearly shifted in recent years from whether climate change is happening to what is causing it and what needs to be done about it.

6. It suggested that climate change presented major challenges for Scotland’s land using industries, but that a well-planned and co-ordinated adaptation response would minimise the negative impacts and highlight potential opportunities.
7. The Climate Change Bill was brought forward to create mandatory climate change targets to, among other things, drive decisions in government and business, create and enable new means of reducing emissions and adapting to climate change, and provide a strong example to other countries.

Tackling Climate Change

8. NFU Scotland considers that the Scottish Government is well placed to influence many of the policy areas central to a strong mitigation and adaptation response in Scotland. NFU Scotland supports the development of a Scottish adaptation strategy to identify priority adaptation action required in Scotland and to clarify roles and responsibilities in achieving this action.

9. However, whilst the existence of climate change is widely accepted, there is still some uncertainty in the pace, pattern and magnitude of this change. Nevertheless, it is expected that, on average over the course of this century, annual temperatures will rise whilst precipitation will increase in winter but decrease in summer. In addition, the frequency and intensity of extreme events such as storms or droughts may increase, possibly sooner than changes to average conditions.

10. As a result, most areas in Scotland are likely to experience a longer agricultural growing season. Improved crop and grass growth will lead to new enterprises becoming viable as their biological limit extends northwards.

11. Conversely, the viability of some existing enterprises will reduce due to, for example, increased soil moisture deficits or heat stress. Equally, some existing and new weeds, pests and diseases will become more common in warmer and wetter conditions. Within this, there will be regional variation across Scotland - as with current conditions from north to south and west to east.

12. Therefore, given the uncertain and variable impacts that climate change will have on Scotland, and globally, NFU Scotland considers that a far more sophisticated approach to tackling climate change is required - rather than simply expanding tree cover across productive agricultural land.

13. NFU Scotland considers that it would be far more effective to divert resources to farm businesses in order that they can take informed and supported decisions in order to adapt agricultural practices and mitigate climate change impacts, and thereby deliver a range of wider rural development benefits as a consequence.

14. In responding to the challenge and opportunities posed by climate change, individuals and representative bodies across the farming industry have a key role to play.
15. In adapting to climate change, farmers and other land managers need to be aware of the potential positive and negative influences of climate change and adjust their business practices accordingly. For example, within-season adjustments to the timing of field and marketing operations and longer-term adjustments such as choice of livestock breed, mix of enterprise and business structure and land use system.

16. Farmers and other land managers also need to contribute to mitigation of climate change. This may require wider adoption of current best management practices, such as nutrient budgeting and energy efficiency informed by carbon and energy audits but, given appropriate policy support, more significant adjustment to the nature of agricultural land management could be achieved to provide ‘win-win’ outcomes.

The Balance of Land Use in Scotland

17. NFU Scotland is clearly of the view that Scottish agriculture and individual farm business can make a very positive contribution to tackling climate change. At the same time, the industry takes the principal role in rural development - not least through its contribution to local economies and delivery of other landscape and biodiversity benefits.

18. However, NFU Scotland considers that this function could have an even greater impact if the policy environment in which farming and farmers currently operate in were more receptive to agriculture’s primacy in both land use and tackling climate change.

19. NFU Scotland believes better integration between currently separate policy themes such as farming and food, forestry, flooding and biodiversity - all of which are linked to land use and require some degree of spatial co-ordination and co-operation across different parcels of land and therefore different farms - must be pursued.

20. This is essential because climate change issues can not easily be separated from other aspects of land use policy, or from broader sustainable production and consumption issues. It is essential that there is co-ordination and consistency of climate change policy across all other areas of the economy. In particular, adaptation and mitigation options need to be compared across, not just within, sectors to ensure comparability of true costs. NFU Scotland seeks clarity and consistency of approach to climate change targets and responses across all sectors.

21. In the short-run, the scope for modifying SRDP measures and funding must be explored to ensure that farming, as well as forestry, can play a lead role in tackling climate change. NFU Scotland considers that there is a real need to avoid overly simple or naive policy approaches to tackling climate change - and the blunt tool of diverting resources to planting trees on good agricultural land falls right into that trap.
22. Instead there is a need for policies structured to allow for localised flexibility, whilst achieving national aims. For the longer-term, attention needs to be paid to designing market mechanisms to promote mitigation - agriculture’s inclusion in an emission trading scheme should be explored.

23. The proposals for the forestry provisions in the Scottish Climate Change Bill also raise more fundamental questions of how Scotland uses its land. NFU Scotland firmly believes there must be a focus on preserving and enhancing the benefits delivered by active farming and food production - including those in relation to climate change.

24. Scotland’s farmland can not reasonably be expected to deliver against all Scottish Government policies on food, flooding, climate change, tourism, access and inclusion without some trade-offs. If farmland is to deliver multiple public benefits, then there needs to be a proper evaluation of its worth backed by fully resourced and accessible measures that allow farmers to optimise that 'value' for the greater good.

25. The stated intention that this study does not focus on land ownership but instead looks at productivity is clearly welcome. While the findings of this study are not due to be presented until late next year, the fundamental changes taking place in Scotland’s hills and uplands means that decisions to address those changes need to be made on an ongoing basis rather than waiting until the study reports.

26. The Scottish Government must face up to the clear conflicts in land use that are raised by such proposals. Every year 1,200 hectares of ‘greenfield’ - an area the size of a large town - is lost to housing and industrial development. That development is generally taking place on some of Scotland’s most productive arable land, with that limited resource lost to food production forever.

27. At the same time, the Scottish Government has set itself the target of forestry coverage on 25% of Scotland’s land area. Any expansion in forestry area is likely to take place on ground traditionally used for grazing livestock. The Scottish Government, therefore, must also address whether the priority lies with active farming and food production - and all the rural development co-products that go with that - or elsewhere.

There is a limit to the uses that any area of land can deliver and the Scottish Government must recognise that if it is to reconcile concurrent policy aims.

NFU Scotland
3 February 2009