

Report on results from the Scottish Governments consultation on future CAP direct payments in Scotland from 2015

Contents

1 – Acknowledgements

2 – Executive summary

3 – Introduction

4 – General analysis of responses

- 4.1 The respondents

- 4.2 Selected questions

- 4.3 Basic Payments Section – results
 - Payment regions
 - Regional Budgets
 - Internal convergence
 - Active farmer test - minimum activity requirement

- 4.4 Environmental measures section
 - Basic Greening requirements - Permanent Grass
 - Basic Greening requirements – Ecological Focus Areas
 - Equivalence Practices
 - Equivalence Practices - Crop Diversification
 - Equivalence Practices – EFA
 - GAEC – Results

- 4.5 Other measures
 - VCS – beef
 - VCS – sheep
 - VCS – possibility to increase VCS level
 - New entrants

- 4.6 Proposed Final Package

- 4.7 Comments box analysis
 - Question 14 comment box themes;
 - Question 41 comment box themes
 - Question 56 comment box themes

5 – Conclusion

6- Feedback

1 – Acknowledgements

There was a good response to the CAP Direct Payments consultation on the Scottish Government's CAP reform proposals. The number of responses received was substantially higher than for previous consultations on Pillar 1 of the CAP.

The consultation was advertised through a variety of mediums such as the CAP reform website and posters at government offices throughout rural Scotland. We collected names of interested parties and circulated a link to access the online consultation to those on the list. In addition Cabinet Secretary made reference to the consultation, encouraging participation, in a letter that was sent to all farming businesses in Scotland who submitted a Single Application Form (SAF) in 2013. The responses received reflect the variety of individuals, organisations and businesses associated with land use in Scotland.

The Scottish Government would like to thank all those individuals and organisations who took the time to respond to the consultation. The Scottish Government would also like to thank all those staff members who assisted in producing the consultation and analysing the results.

2 – Executive summary

Responses to the Scottish Government consultation on CAP Direct Payments show general support for a large number of the Scottish Government (SG) proposals. However, there are a number of exceptions to this general support, most notably on;

- The RGR region rate; SG proposed a rate of €25 /ha but the responses indicate a large support for a higher rate for the RGR region.
- SG proposed that the move to an area based rate should be completed within the 2015 -2020 CAP programme but the responses indicate strongest support for a move on day one (2015).
- Greening measure, Ecological Focus Area (EFA) option to allow use of landscape features. SG noted practical difficulties in mapping these but responses indicated strong support for the inclusion of these features.

There are a number of emerging themes from the comments provided which go some way to explain these opinions. These add value to Scottish Government's understanding and are considered alongside the statistical responses when developing CAP policy.

3 – Introduction

On the 26th June 2013 the European Council, Parliament and Commission reached a political agreement on CAP reform. The main CAP 2015- 2020 Regulations were published on 20 December. The CAP provides the main forms of support to land based sectors across Europe.

The agreed regulations set out a completely new framework for Pillar 1 Direct Payments, which from 2015 will see major differences in how support is allocated. One of the biggest changes to CAP 2015 - 2020 is the move towards a rate per hectare rather than, as is currently the case, support based on historic activity.

The new regulation sets out a large number of options for CAP which each Member State will have to consider how best to implement in their own country. Member States are required to notify many of their implementation decisions to the European Commission by 1st August 2014.

Cabinet Secretary Richard Lochhead will make a formal announcement of Scotland's CAP decisions to the Scottish Parliament on 11th June. This will be followed with more detailed information once all implementing regulations and delegated acts are published.

The consultation sought views on the various options available to the Scottish Government and how to implement these. The consultation was published on 17th December, with the initial intention of running to 17th March. However, this deadline was extended to 28th March, at Mr Lochhead's request, to allow time for responses from as wide a range of stakeholders as possible.

The Scottish Government decided to use an online consultation system call Delib. This differed from the previous consultation which used the Questback system. The main reason for choosing to use Delib this time was that the system offered respondents the ability to save their responses and return to at a later date. It was felt that such a function was necessary given the amount of detail contained in the consultation and complex subject matter.

The Delib consultation comprised single option tick-boxes, ranking questions, multiple option tick-box questions and 3 sizable comment boxes. Using a large number of quantitative questions helped us to accurately interpret the responses to complex aspects of the CAP and to identify trends more easily. The Delib system automatically runs statistical analysis reports removing human error. By contrast, analysing comments boxes tends to be more subjective.

The consultation was divided into four main sections with questions grouped to make it easier to understand the related aspects and options of the CAP and also to acknowledge that not all respondents would have an interest in all four sections. The four sections were;

- 1) Basic Payments: consisting of; payment regions, regional budgets, internal convergence, minimum threshold, minimum activity requirement, reduction coefficients, degressivity/capping, windfall tax and siphon on sales of entitlements.
- 2) Environmental measures: consisting of Greening payments, Greening – standard measures, Greening – equivalent practices and cross compliance.
- 3) Other measures: consisting of; voluntary coupled support, redistributive payment, young farmer payments, small farmer scheme, Pillar 1 ANC payments and national reserve.

4) Proposed final package: consisting of the Scottish Government’s proposed basic payment support package.

4 – General analysis of responses

The consultation contained 56 questions in total, split across the four sections. The questions focused on the options available within the main regulation and presented the Scottish Government proposals as of December 2013.

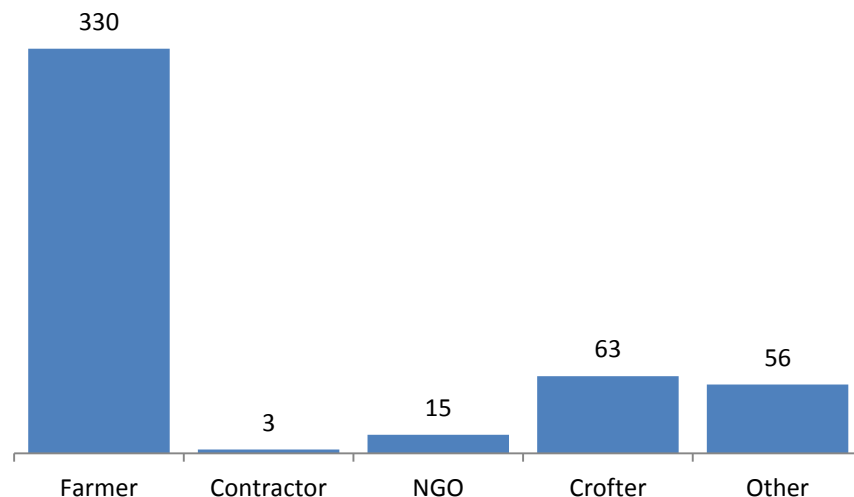
The total number of consultation responses received was 467, of which;

- 434 were online
- 33 were hard copies (paper copies or letters containing comments)
- 83% were from individuals
- 17% were from organisations/groups

The 467 responses included 9 submissions which were presented in a format that did not match that of the Delib consultation and were therefore treated as supplementary comments and considered and analysed individually.

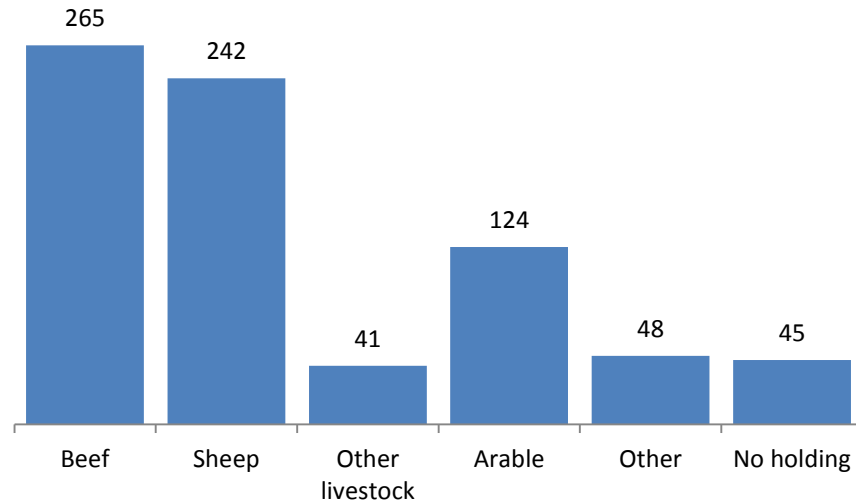
4.1: The respondents

Of the 467 responses graph (i) shows the occupation of those responding. A substantial number are farmers (70%), with crofters accounting for 13%.



Graph (i) 467 responses

Graph (ii) shows the main enterprise(s) of those responding. Respondents could select up to 2 enterprises, for example a beef producer may also have a significant sheep enterprise. This shows a high proportion of respondents having beef enterprises (56%), and sheep enterprises (51%). Just over a quarter (26%) have an arable enterprise.



Graph (ii) 467 responses, selecting up to 2 enterprises

4.2 – Presented results

The results presented in this report are a selection of the 56 consultation questions, chosen because they represent the main policy issues. The full results for all 56 questions can be found in Annex 1 of this report (with the exception of the comment box responses for Q14, Q41 and Q56).

Apart from the mandatory respondent information questions presented in section 4.1, all other questions were optional and as such the response rate to these questions varies throughout the consultation. For the purposes of analysis the results displayed in the following sections are concerned only with those individuals that responded to the specific question. Given that many questions had the option to give a “no view” response, we have discounted “not answered” figures from the statistics to enable a better understanding of the results. It should be noted that response rates to most questions were relatively high with the exception of the “Environmental Measures” section 4.4 where the response rate was generally lower.

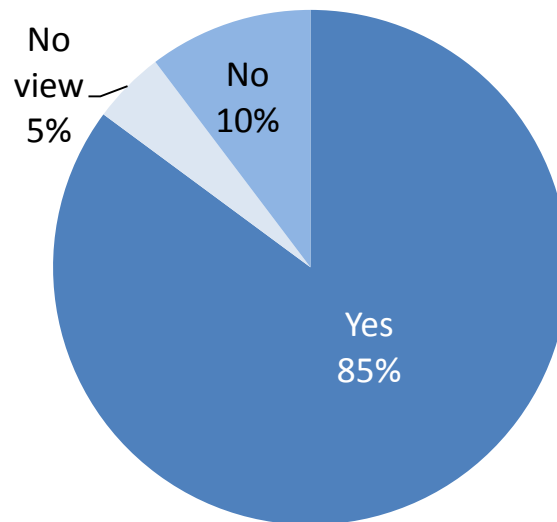
The ranking questions 4, 7 and 13 asked respondents to rank in terms of priority using a value i.e. 1, 2, 3 etc. It should be noted that whilst a large proportion of respondents did follow the question and assign each option a different ranking value, a small number decided to rank options with an equal value within the same question, for example they used the value 1 for more than one option. This means some of the results are slightly skewed. However as this only happened in a minority of cases; the general trends shown for the ranking questions are still correctly displayed.

4.3: Basic Payments Section - results

Payment regions;

Of the 437 responses to Question 1, 85% agreed with the proposal to use historic land type designations. See Graph (iii) below.

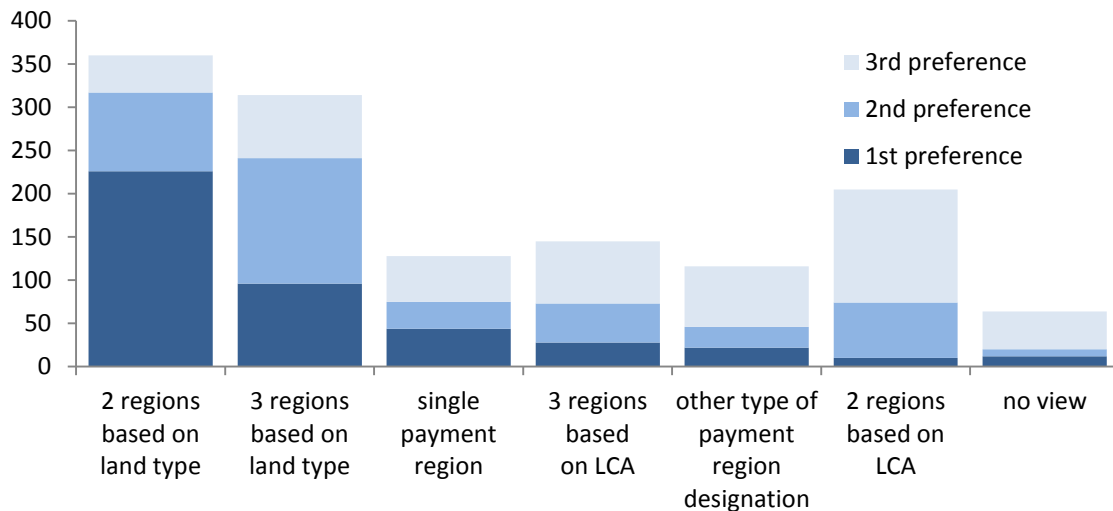
Question 1: The Scottish Government proposes that Payment Regions should be based on historical land type designations. Do you agree?



Graph (iii) 437 responses

A similar trend can be found in Question 4 (graph iv), which asks respondents to rank their top 3 future Payment Region options. Interestingly even when combining all 1st, 2nd and 3rd preferences per option, the Scottish Government proposed option (2 region based on land type) still remains top preference, followed by the 3 region based on land type option. This shows strong support towards regions being based on land type with strong support for 2 regions and slightly less support for 3 regions. It is useful to note that the highest 3rd preference was the 2 regions based on LCA, which is also the 3rd preference overall when combining all preferences per option.

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



410 responses options - ordered by most popular 1st preference

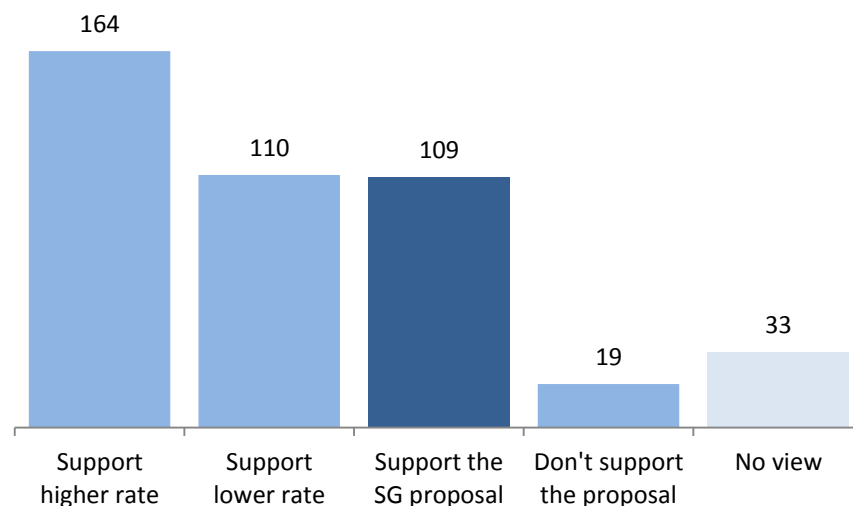
Some gave more than one 1st preference

graph (iv)

Regional Budgets

The results from question 5 (graph v) show the largest support (38%) was for a higher rate than the proposed rate of €20 - €25 per hectare for the RGR Region. Almost equal numbers of respondents support the Scottish Governments proposed rate as support a lower rate (25%). No clear majority supports any of the proposed options.

Question 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:



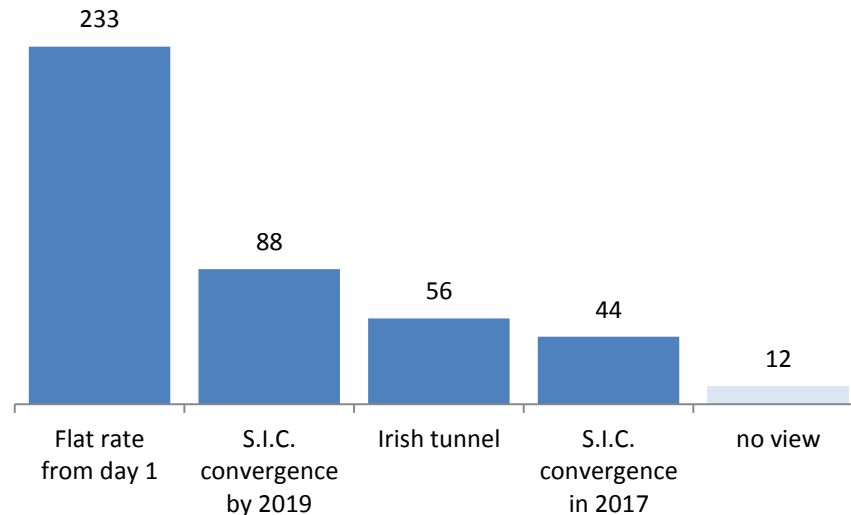
graph v 435 responses

Internal convergence

Interestingly a majority (54%) want to move to a flat payment rate on day 1 in 2015, (see graph vi). With 20% wanting Standard Internal Convergence (S.I.C) by 2019

and only 13% wanting to use the Irish tunnel method for convergence. If we combine responses to the two internal convergence options i.e. convergence to full area payments by 2017 or by 2019, this still only provides 30% support for some form of internal convergence.

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



graph vi 433 responses

As previously noted only 17% of responses were from organisation/groups. Each group is only represented by one response although the organisation/group represents a large number of their members. Therefore it is useful to consider some of the main organisation responses to this question;

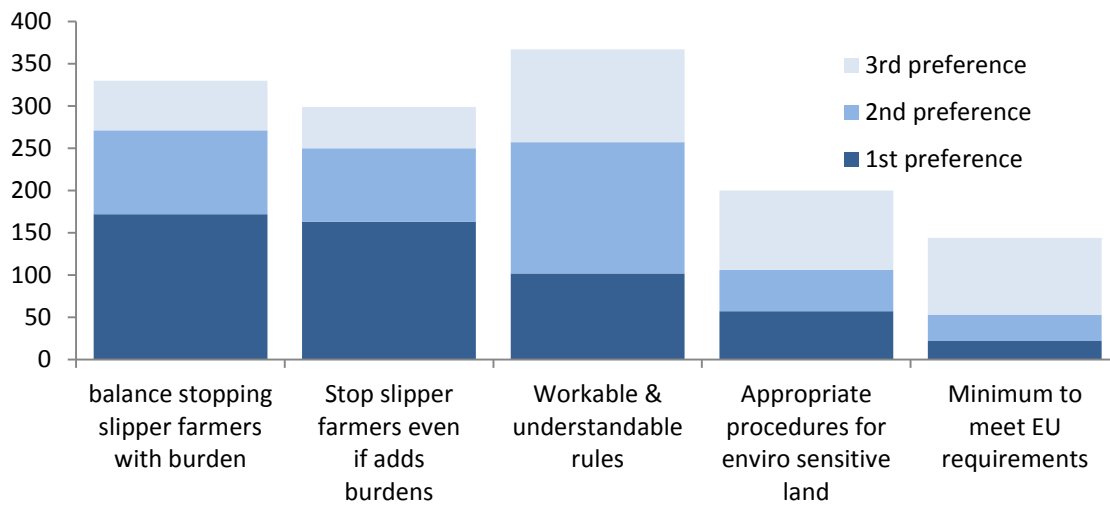
- National Farmers Union Scotland (NFUS): see transition as critical to sector, sees merit in exploring tunnel option
- Scottish Land and Estates (SLaE): S.I.C by 2019
- National Sheep Association (NSA): S.I.C by 2017
- Scottish Crofting Federation (SCF): Flat rate from day 1 (2015)
- Scottish Environment LINK: Flat rate from day 1 (2015)
- Scottish Beef Association (SBA): Irish tunnel
- Quality Meat Scotland (QMS): S.I.C by 2019

Looking at the responses above there is a wide range of views as to what convergence method should be used. This range of views is not as obvious in the statistical responses.

Active farmer test - minimum activity requirement

In question 13, if we look at respondents' 1st and 2nd preferences, we find there was a similar response rate to two opposing statements i.e. *balance stopping slipper farmer with burdens* and *stop slipper farming even if it adds burdens*. The highest accumulated preference (1st + 2nd + 3rd) was for *workable & understandable rules*.

Question 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.).



427 responses

options - ordered by most popular 1st preference

Some gave more than one 1st preference

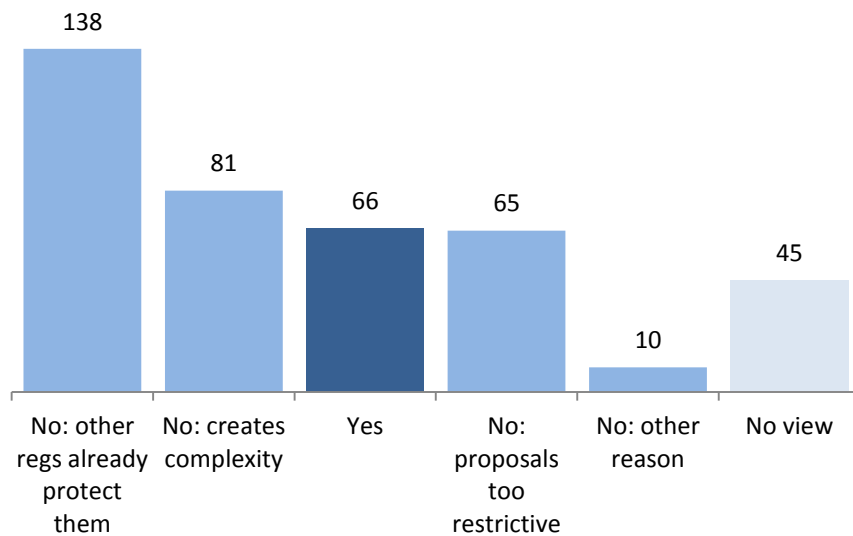
graph vii

4.4 Environmental measures section

Basic Greening requirements - Permanent Grass

As shown in graph viii a large number of respondents answering question 21 (34%) felt that no further designation of sensitive grassland should be made as other regulations protect this type of land. When combining the results for all the “no” options this shows a 70% majority were opposed to the further designation option for a variety of reasons.

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

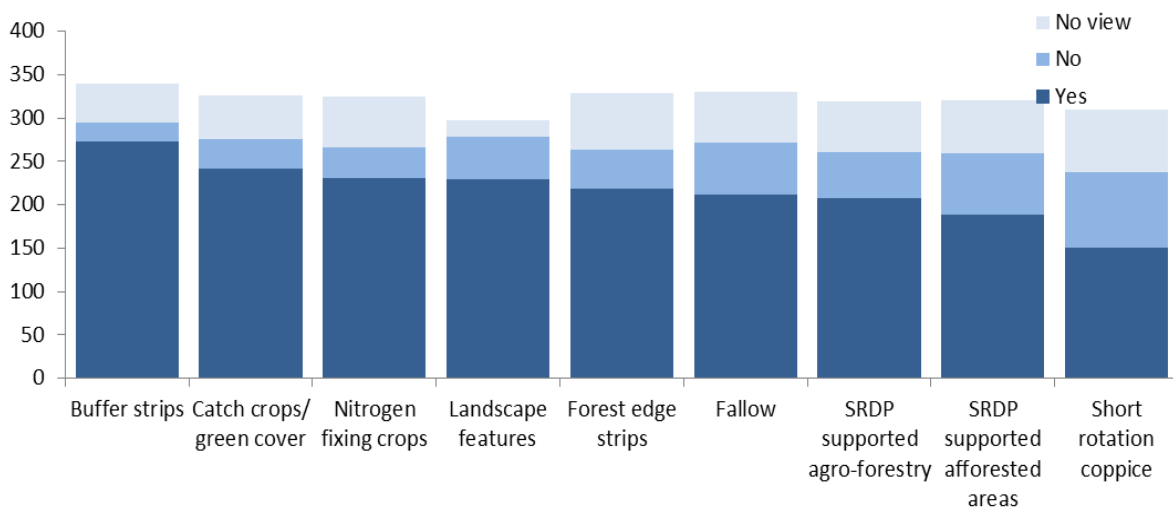


graph viii 405 responses

Basic Greening requirements – Ecological Focus Area

When looking at the types of Ecological Focus Area (EFA) options that respondents would like to be available (graph ix) the trends show that more respondents would like to see options available than would not. The least favoured option is short rotation coppice. And the most preferred option is for the inclusion of buffer strips. The overall trend is for all options to be included, possibly to provide a wide as choice for farmers as possible. This can be deduced from the relative low number of “no” marked options.

Question 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):



339 responses

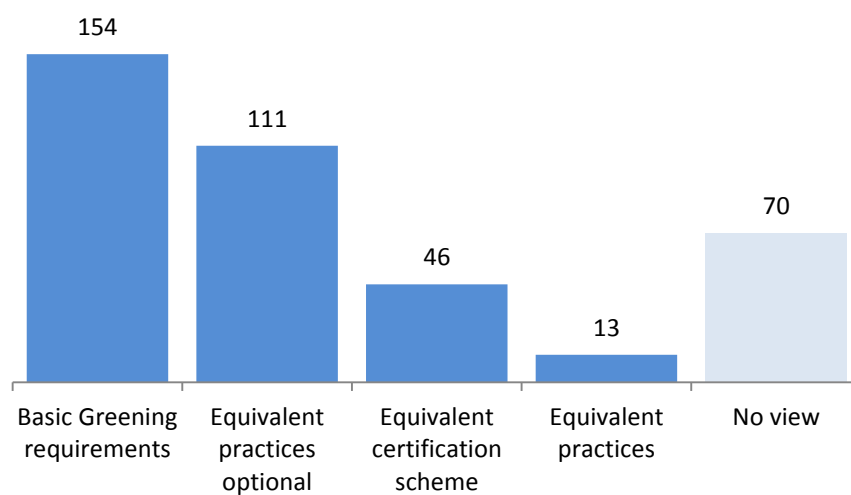
options - ordered by most popular

graph ix

Equivalence Practices

Looking at the question of an equivalence scheme to meet the Greening requirements, question 27 asked respondents which option they would choose, (see *graph x*). Of those responding to this question, 39% would like to see the standard measures used rather than equivalence. However 28% would like to see farmers having the option to choose between equivalence and the standard measures. Far fewer responded positively to the equivalence-only options, i.e. a certification scheme (11%) or equivalence practices (3%).

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



394 responses

graph x

Looking at the responses from some of the main organisations we find;

- National Farmers Union Scotland (NFUS): basic greening requirements, any equivalence scheme should be optional
- Scottish Land and Estates (SLaE): basic greening requirements only
- National sheep Association (NSA): basic greening requirements only
- Scottish Crofting Federation (SCF): basic greening requirements only
- Scottish Environment LINK: Equivalence certification scheme
- Scottish Beef Association (SBA): no view
- Quality Meat Scotland (QMS): basic greening requirements only

The results from the main organisations suggests a similar trend to the statistical result from all respondents to the consultation; the main support being for basic greening requirements only.

Equivalence Practices - Crop Diversification

Looking at the crop diversification Greening measure (see *graph xi*), of the 390 responses to this question 36% had no view, 34% would like *farmers to have a choice of equivalent practices* compared to 25% who preferred *the standard*

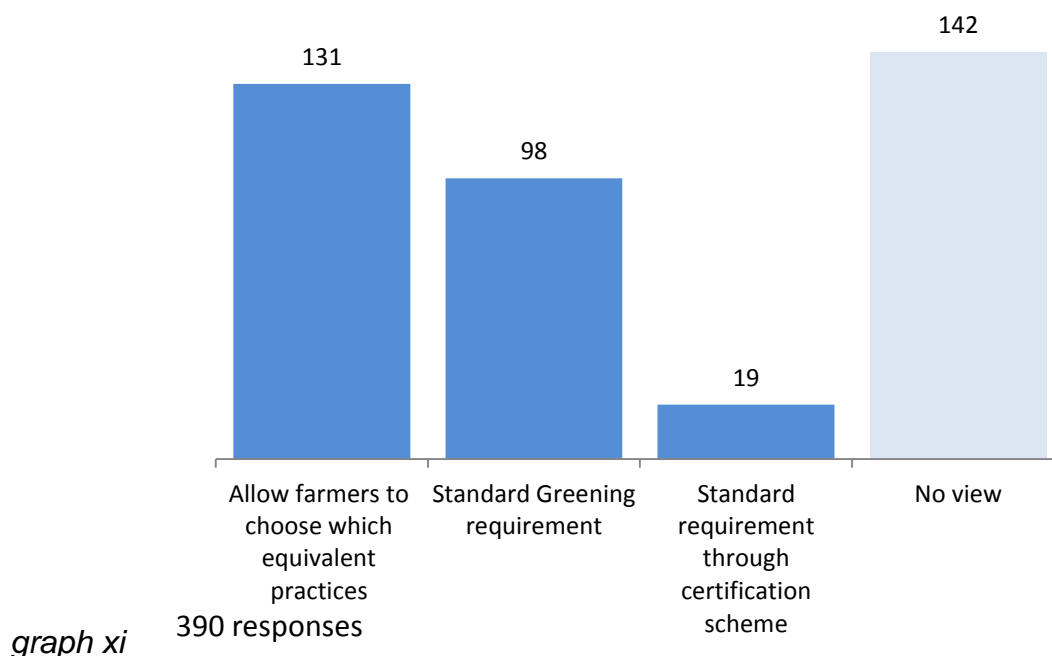
Greening requirement for crop diversification. Looking at both options containing the standard Greening requirement, far fewer supported using a *certification scheme to deliver the standard requirements*. Even when combining those responses in favour of delivering some form of the standard requirement this equates to 30%, which is still less than the 34% who want a choice of equivalent practices.

This trend of respondents wanting a choice of how to implement the Greening requirements is also seen in the previous section, graph ix.

Interestingly the trend displayed in graph xi, which shows a majority support for a *choice of which equivalence practices*, is different from the trend displayed in graph x whereby more support was found for the *basic Greening requirements* in general than for equivalence. One possibility is that when the specific measures and their equivalence options are presented, the inflexibility of the standard measure, for example for specialist growers, drives the desire for an equivalent measure as a practical alternative. The desire from many respondents could be to find, through equivalence, an alternative to growing additional crop(s) and thereby limiting the impact this standard measure would have on specialist growers.

Since the publication of the consultation Scottish Government has undertaken work looking at possible equivalence practices for crop diversification to try and address these concerns.

Question 28: As far as the Greening crop diversification requirement is concerned, how do you think it should be implemented in Scotland?



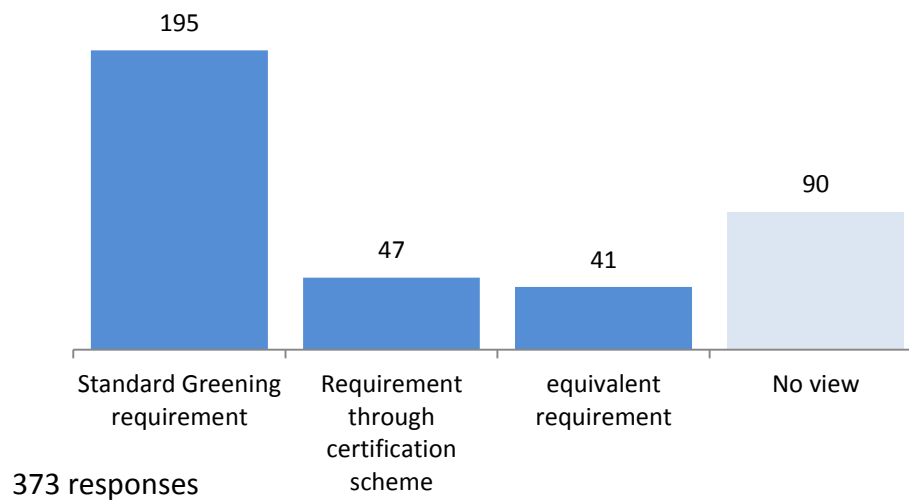
Equivalence Practices - EFA

Looking at question 33 on an equivalence option for the EFA requirement (see graph xii) the trend of low support for equivalence is reflected again here. Most

respondents (52%) answering question 33 prefer the standard measures for EFA as opposed to an equivalent EFA scheme.

This again seems to support the analysis that the main reason for respondents wanting an equivalence scheme is to address the standard crop diversification requirement.

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

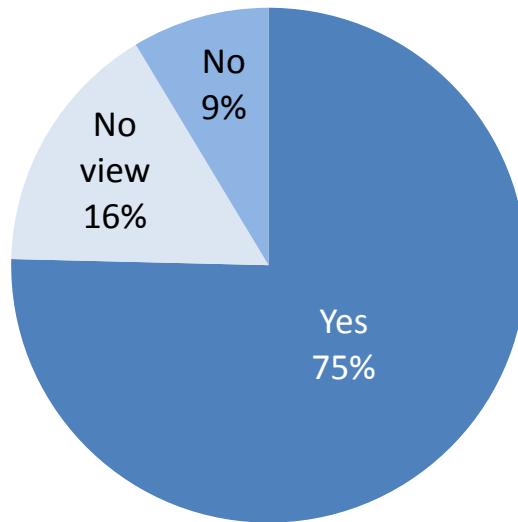


graph xii

GAEC (Good Agricultural and Environmental Condition) – Results

Looking at the possibility of the Scottish Government introducing new GAEC requirements, question 37 asked if respondents agreed with the proposal not to include any new requirements. Of the 394 responses the vast majority (75%) agree with the proposal.

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



394 responses

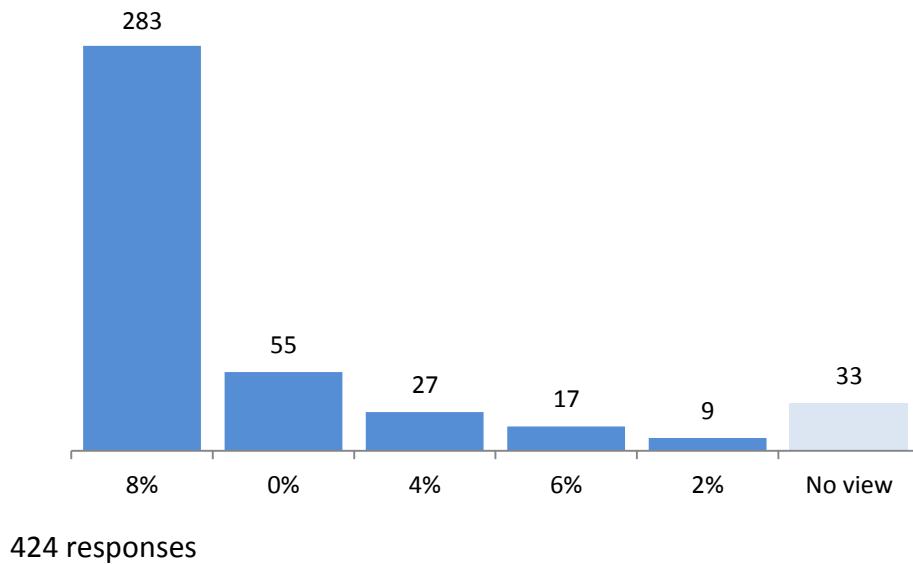
graph xiii

4.5 Other measures

VCS – beef

Question 42 looked at the future level of coupled support specifically for the beef sector. The results from graph xiv show strong support (66%) for all 8% of VCS to go to beef. Only 12% of respondents feel no VCS should be available for the beef sector. When considering the number of respondents that have beef enterprises this is perhaps not too surprising. These results could also be due to the impact on the beef sector of the move to an area based payment system away from an historic one. The more intensive beef farmers have traditionally held less land and generally hold payment entitlements based on high historic outputs. Beef farmers may feel that VCS is one tool available to reduce the impact of this change on their businesses.

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



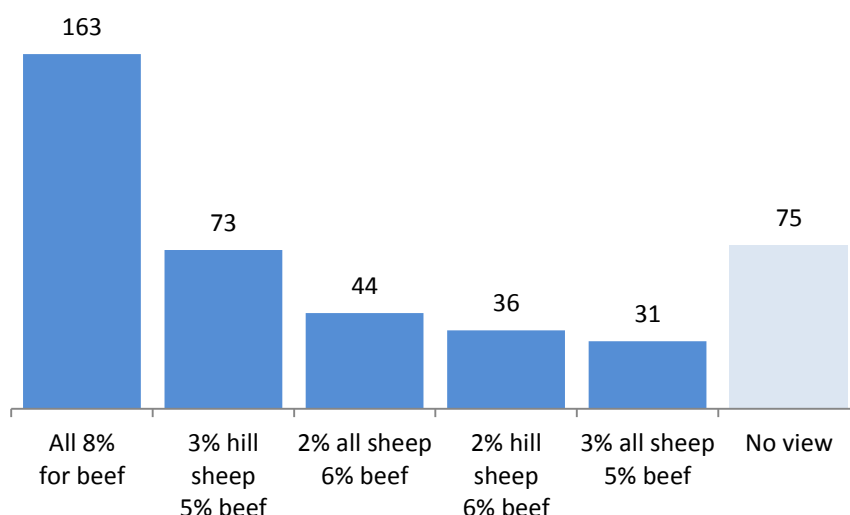
graph xiv

VCS - sheep

Looking at the possibility of a VCS scheme for the sheep sector, question 46 set out some suggestions on the possible percentage of VCS that could be used for sheep and beef. Graph xv shows 38% of 422 respondents favour all 8% VCS for beef, similar to the strong support displayed in graph xiv. However, when we look at the combined response regarding VCS for sheep, 43% of respondents favoured varying proportions of VCS to be allocated to a sheep scheme. The highest proportion (17%) favoured a 3% *hill sheep*/5% *beef* option. This level of support for VCS for sheep could be linked to the large number of respondents stating they have sheep enterprises.

Since the consultation publication Scottish Government has been actively researching the possibility of a VCS scheme for sheep.

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



graph xv 422 responses

Again, looking at the responses from some of the main organisations, this shows a large support for using *all 8% for beef*, again in keeping with the trend from the full response to the consultation. The strong support for 8% VCS to go to beef may be due to industry concerns about the identification requirement a VCS sheep scheme could impose and the potential increase in inspection rates, which could result in penalties for non-compliance, affecting sheep producers. Such concerns may be the driving factor behind NSA's perhaps surprising response to this question;

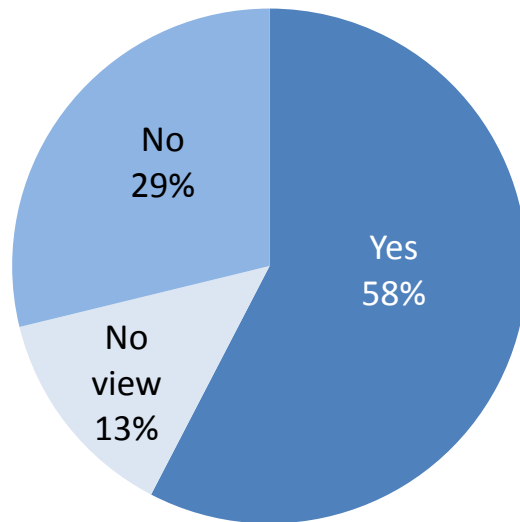
- National Farmers Union Scotland (NFUS): All 8% for beef
- Scottish Land and Estates (SLaE): All 8% for beef
- National Sheep Association (NSA): All 8% for beef
- Scottish Crofting Federation (SCF): All 8% for beef
- Scottish Environment LINK: no view
- Scottish Beef Association (SBA): All 8% for beef
- Quality Meat Scotland (QMS): All 8% for beef

VCS – possibility to increase VCS level

The consultation asked for a response on the possibility of increasing the amount available for VCS from 8% of Scotland's national budget ceiling to a higher percentage (by using the UK's national budget ceiling as a reference figure). The response to question 47 (graph xvi) shows a majority of 58% of those responding agreed that the Scottish Government should explore this possibility.

Since the consultation was published the European Commission have confirmed that Scotland can apply VCS in Scotland by reference to the UK ceiling and discussions have taken place between the Scottish Government and the other UK Devolved Administrations on how any increased percentage could potentially be used by Scotland.

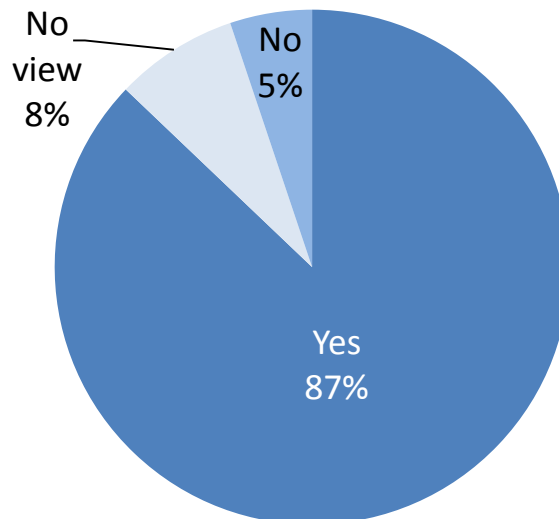
Question 47 – Should we explore with the other UK regions whether it could be possible to use more than 8% of the Scottish ceiling for voluntary coupled support?



graph xvi 427 responses

New entrants

Question 52 asked if the Scottish Government should help new entrants from day one by topping up basic payments to the regional average if area-based basic payments were to be phased in over a period of time. The results show that 87% agreed with this proposal. Interestingly a similar trend can be found in question 6 (graph vi) where 54% would like a flat rate from day one. It should be noted that if this were to happen there would be no requirement to top up new entrants' basic payment values.



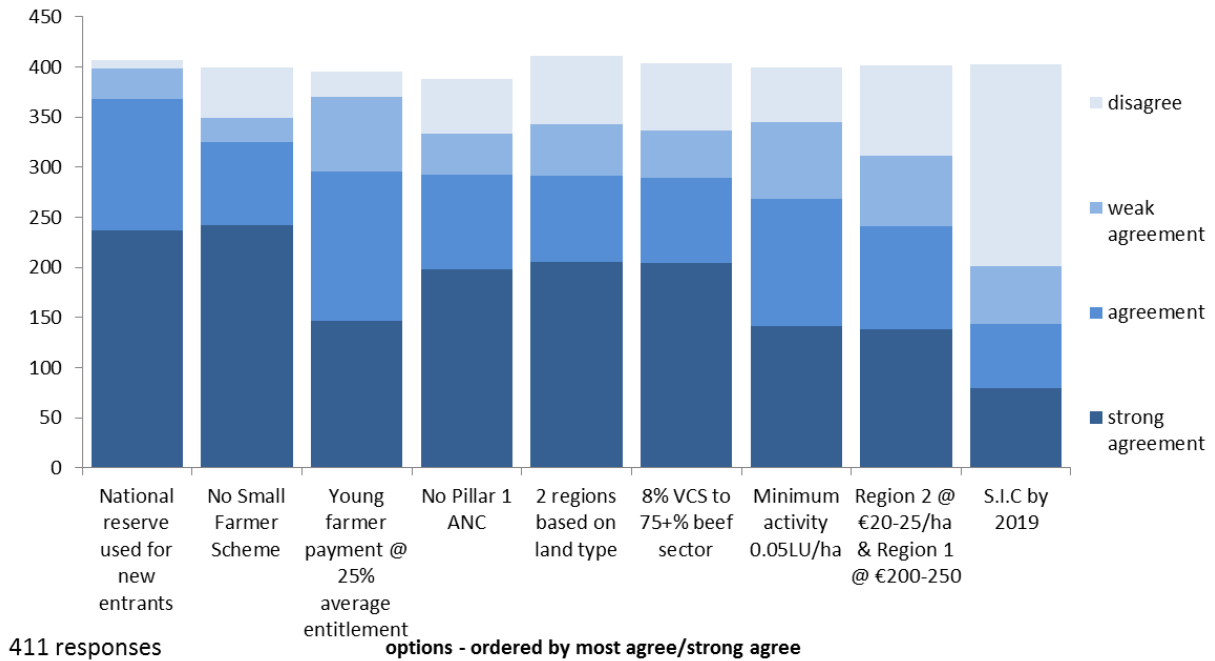
graph xvii 427 responses

4.6 Proposed Final Package

Of those that answered question 54, on the proposed final CAP package, the most agreed/strongly agreed with aspects were for a *national reserve to be used for new entrants* (graph xviii). Interestingly the standard initial convergence (*S.I.C*) by 2019 had the lowest agreement/strong agreement score, whereas in question 6 this was

the 2nd highest ranked result where 20% of respondents wanted this as a preferred method of convergence.

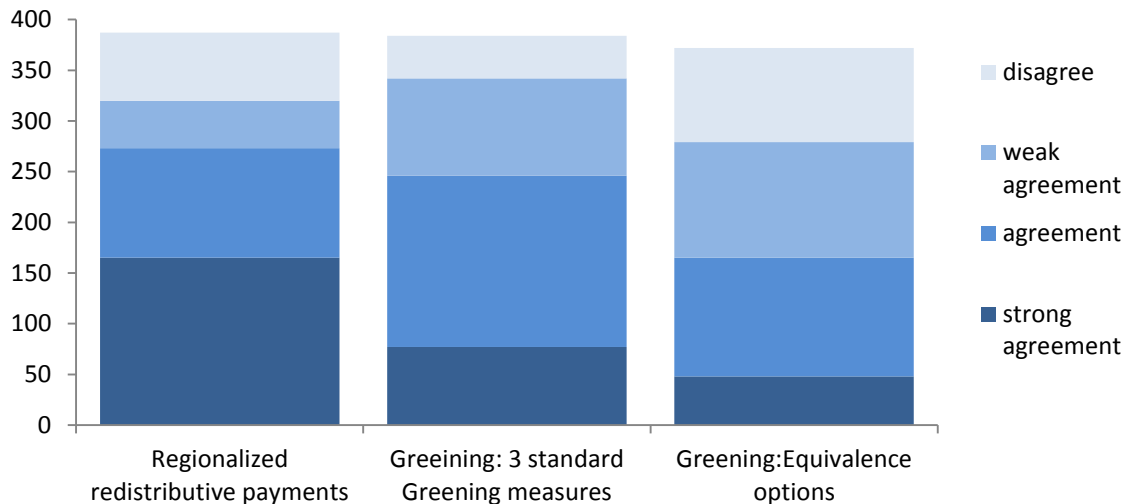
Question 54: Please score the following aspects of the proposed package for Basic Payments;



graph xviii

When looking at the 3 elements of the final package below, support for 3 *standard greening measures* was relatively high - again consistent with the results in question 27 where 39% chose this option over other greening options. When looking at the use of *equivalence option for Greening*, this has the lowest level of support, and again this is reflected in previous results found in question 27 and question 33. The highest response rate for agreement/strong agreement was for *regionalized redistributive payments*.

Question 55: Please score the following possible aspects of the future package that feature should be in final package;



387 responses options - ordered by most agree/strong agree
graph xix

4.7 Comments box analysis

There were 3 comment boxes incorporated at intervals throughout the consultation;

- Question 14 – comments on the minimum activity requirement
- Question 41 – comments on Greening measures, Equivalence and GAEC
- Question 56 – comments on the proposed package as a whole

While the above questions asked respondents for specific comments relating to each section, many respondents used the comment boxes to provide their thoughts on the CAP as a whole. Around 70% of respondents completed at least one of the comment boxes.

From analysing the comment boxes a number of recurring themes were identified. The results that follow are the most commonly recurring themes. Other themes were identified, however where 10 or fewer respondents made a particular point, we discounted it in the analysis to concentrate on the main recurring themes.

As previously mentioned, in addition to the manual paper responses received, nine supplementary comments were also submitted outwith the Delib online consultation format. The same analysis of identifying themes was applied to these submissions.

Question 14 comment box themes; (minimum activity requirement)

Approximately 53% of respondents offered comments in answer to question 14. A large proportion of those responding have a variety of comments that were often different to other respondents or were specific to the individuals business, for example the forthcoming changes will see my business adjust in this manner etc.

Of those that answered question 14 almost 1 in 4 thought that a minimum activity requirement should be linked either directly or indirectly to production. For example one respondent said; *“There needs to be a method of ensuring that the actual land (each FID) which is claimed is actively farmed, not just that a claimant has some livestock on eligible land somewhere in the country.”* This theme was the most common theme identified and could possibly be in response to the acknowledgement that slipper farming should be tackled to avoid funds being paid on inactive areas.

Approximately 1 in 9 responding felt that people who provide other public goods such as managing SSSIs or entering into agri-environment schemes should be eligible for subsidies. For example one respondent said; *“I think anyone no matter what their status who manages SSSI land should be eligible for support, otherwise it [the land] will be abandoned”*

Around 1 in 11 responding suggested using other proof of activity such as farm records or accounts/tax returns or membership of assurance schemes to meet minimum activity requirements.

More than 1 in 20 felt that other management activities, besides keeping livestock, should qualify as activity e.g. cutting forage. This may be a response from those extensive farms that would be concerned about too high a stocking density level being set to meet the minimum activity, and their own business’s ability to meet it.

One of the lowest recurring themes identified was that stocking densities need to be high enough to avoid tokenism.

Question 41 comment box themes (Greening and GAEC)

Approximately 39% of respondents answered question 41, the lowest comment box response rate in the consultation.

Of the comments provided, three recurring themes related to the overall objectives for Greening and GAEC. Of these, the most common theme (supported by approximately 1 in 7 comment box responses) was the need to avoid unnecessary complexity in how Greening and GAEC are implemented in Scotland, followed by the need to deliver a meaningful environmental benefit, and the need to provide flexibility for farmers and avoid impacts on food production.

In relation to individual Greening requirements, the most common theme (supported by 1 in 12 comment box respondents) was concern over the impact of the crop diversification requirement, with half of these respondents arguing that farmers should have the option of carrying out alternative equivalent practices in a certification scheme.

On GAEC, the most common theme (supported by 1 in 10 comment box respondents) was it is inappropriate to require farmers to control invasive non-native species under GAEC because it is costly for farmers to undertake, benefits from a collaborative approach and can be influenced by factors beyond farmers’ control,

including management of roadsides and railways. Instead, respondents argued that control of invasive non-native species should continue to be supported under SRDP.

Question 56 comment box themes

Over 70% of respondents answered question 56, the largest comment box response in the consultation.

Approximately 1 in 10 responding to question 56 said there was a need to help LFAs/vulnerable areas and crofting by targeting funding where it is needed most because of additional costs e.g. transport, supplementary feeding, distance from market etc. This response is comparable with the 13% of total respondents who are crofters and are likely to be effected by geographical constraints.

Slightly fewer, just over 1 in 11, said support should be simple and implementable - a common fear being penalties at farmer level and at government level from the European Commission

Around 1 in 16 diverged from the proposed two regions albeit for different reasons. For example one respondent said, *“if a genuine attempt on fairness of financial distribution to all farmers and crofters is to be made, it must be necessary to split Scotland into 4 regions for payment allocation”*.

The same number felt payments on historic levels were unjustifiable often citing that the industry already had had enough time to adjust.

A similar number suggested various ways to eradicate slipper farming on the same lines as Q14 e.g. lower RGR rate to make it less attractive to slipper farmers, using records or membership of assurance schemes to demonstrate activity etc.

Almost 1 in 20 said SG should adopt a route that is fair for young farmers and new entrants, which interestingly is less support than the statistical results, which show large support for new entrants. Perhaps respondents felt their position on this subject had been addressed by answering the previous closed questions and therefore there was little need to reiterate this point.

Around 1 in 22 noted that it shouldn't be all about production - farmers should qualify for Basic Payments if delivering public goods and enhancing the environment.

Whereas only 1 in 27 were concerned about loss of subsidy to beef sector and suggested a variety of measures to mitigate impact.

An even smaller number recognised difficulties with a VCS scheme for sheep i.e. the need for robust sheep EID and additional inspections.

Of those responding to question 56, around 1 in 30 made a number of recurring points about greening, mainly criticising the crop diversification Greening measure and suggesting alternatives. A lesser number criticised the EFA Greening measure and suggested alternatives.

5 - Conclusion

When considering the results presented in this report it is useful to note that although the response rate was good, as far as consultations go, the 467 respondents amount to approximately 2% of the 22,000 or so registered rural land use businesses in Scotland. Therefore to develop policy solely on the strength of the consultation results would be misguided. Likewise it is difficult to determine the weighting that should be applied to responses from organisations which represent the views of their (often many) members.

While views differed among individuals and organisations alike, there were trends that emerged in results from more than one question. As discussed earlier in this report, clear trends identified include;

- Clear support for a flat rate from day one in 2015
- Strong support for 2 regions based on land type
- Support for farmers to have a choice of a wider range of EFA options
- Large support for equivalence, predominantly as an alternative to the standard crop diversification measure
- Large support for 8% VCS for beef sector
- Some support for a VCS sheep scheme

Interestingly some of the highest supported options related to new entrants, both as a top priority in the final package question 54 and in question 52.

“Simplicity” was a word that was often used in the comment boxes, respondents fearing that a complex CAP would be difficult for farmers to undertake. Others cited implementation difficulties for administrators and the associated disallowance fines from the EC. However, whilst a simple CAP policy is easier to understand and implement for all concerned, it may not deliver the targeted approach that many individual respondents have asked for. The balance has to be between targeting the CAP so it is effective without creating complexity.

6- Feedback

This is the first time the Scottish Government has used the Delib online system to consult stakeholders on the CAP. The main reason for using this system was to enable respondents to save their entries as they go through the consultation and return at a later date if necessary to complete it.

A number of individuals felt the consultation was too complex or too long. While there were a number of supplementary documents individuals could choose to read, these were not a mandatory requirement to be able to complete the consultation. The consultation was constructed with an aim of trying to make what is a complex subject as simple as possible to assist respondents. While the Scottish Government takes this criticism on board it is difficult to see how the options available could have been conveyed more clearly without increasing the length of the document. In addition there were other respondents that wanted more comment boxes to allow

them to expand their answers. This shows one of the challenges in creating a consultation to accommodate all levels of interest and knowledge of the subject.



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ISBN: 978-1-78412-564-6 (web only)

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St Andrew's House
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Produced for the Scottish Government by APS Group Scotland
DPPAS31628 (06/14)

Published by the Scottish Government, June 2014

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