

This discussion paper prepared by RELU is a valuable contribution to the debate on how policy makers respond to competing priorities for land and water resources. The paper raises many challenging issues, a number of which are also being considered internally within SEPA and within Scotland.

SEPA have responded to a range of consultation documents recently which link closely to the questions being asked in this RELU paper. These include consultation on the Scottish Soil Framework, Future Implementation of the Common Agricultural Policy in Scotland, The Future of Flood Risk Management in Scotland, Choosing the Right Ingredients - The Future for Food in Scotland, the Royal Society of Edinburgh Inquiry into the Future of Scotland's Hill and Island Areas, the Forestry Commission Scotland Climate Change Action Plan and the Scottish Climate Change Bill.

This paper successfully demonstrates the very real risks of making policy decisions without fully understanding the consequences of implementation. This risk is enhanced when issues such as climate change are involved; where many of the factors contributing to climate change may not be fully understood in the wider community. To this end it is extremely useful to note the range of projects which RELU is currently involved in and to allow us to consider how the outcomes of these projects can help inform SEPA in its role supporting the Scottish Government in work such as developing the Scottish Climate Change Bill, and the Scottish Flooding Bill.

For example issues such as the Scottish Government's policy to increase the area of woodland cover in Scotland towards 25% cause some concerns. The target is seen as challenging and potentially causes conflict with land uses such as food production, soil conservation, and flood management. Research can identify those areas where expansion is most suitable and also begin to assess whether the public 'good' of expanding woodland on a particular land type outweighs that of continuing to use the land for food production for example.

It is sometimes easy to over simplify the conflict between land uses, for example at 1.3 the comment that extensive, low input farm systems are generally accepted as being of higher nature value than intensive systems, may be true, but there are undoubtedly examples of intensive farms where considerable effort has been made to manage sympathetically for environment and biodiversity and reduce conflict between these aims.

There is some sympathy with the view expressed at 1.12 that farmers are uncertain about what the main policy drivers are, ie is it food security, climate change, or biodiversity? This is perhaps unavoidable at a time of rapid policy evolution; just as climate change issues take centre stage, food supply becomes a major influence in western economies for the first time in a generation. Farmers naturally look for a lead in how they should be positioning their businesses and the messages could be seen as mixed or competing, on one hand the UK government looks forward to a future without production subsidies while at a European level there is only tinkering with the current system.

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There is a whole debate which is ongoing on the question of how land management should be valued in terms of providing public good, and how land managers should be recompensed for the management they undertake. This links very much to proposals for the future of the Common Agricultural Policy and particularly in Scotland to amendment of the Less Favoured Area Support Scheme. The term 'High Nature Value (HNV)' farming is often used today when discussing rural support and it is important that we have an agreed definition of what HNV is, and is it something that can successfully be used to target land management funding mechanisms.

SEPA recognise the comments from the Livestock Waste project about the importance of speaking the right language and finding the most appropriate tools for gathering information. The example of the map/aerial photograph based approach is useful and as SEPA looks to expand our catchment approach to tackling and mitigating the impacts of diffuse pollution is a tool which could be considered.

SEPA supports the view that a mix of mechanisms ie regulation, incentives and advice are necessary in order to progress with objectives such as water protection. The desire for better regulation must be linked to greater education and provision of advice. If land managers are aware of regulation and more importantly the reasons for the regulation then there must be a better chance of compliance. The projects referred to at 1.22 will contribute to a greater understanding of how these mechanisms are linked and whether existing delivery mechanisms can be adjusted to better deliver good outcomes through programmes such as the Scotland Rural Development Programme.

It was interesting to note that the paper raised the possibility that the separate objectives for a 'greener', 'wealthier and fairer', and 'healthier' Scotland may reinforce a silo approach which fails to see the environment cutting across all policy areas. SEPA believes that the Scottish Government's overarching objective of achieving *sustainable* economic growth is useful and that while the word sustainable may mean different things to different people it does help to ensure that a focus on environment is retained in all major policy decisions. SEPA is particularly concerned in ensuring that regulation enables sustainable economic growth and which does not compromise environmental protection.

In summary; SEPA is supportive of the important research being carried out by RELU and looks forward to sharing in the results and outcomes of these projects. There may be opportunities for SEPA to assist in Scotland 'proofing' the research, especially where Scottish legislation and regulations may differ from that of the other UK administrations.