

## Response ID ANON-Y81B-2HZC-U

Submitted to Dairy Production Sector Plan  
Submitted on 2019-02-15 14:26:50

### Introduction

#### 1 What is your name?

**Name (optional):**

Eleanor Kay on behalf of Scottish Land and Estates

#### 2 What is your email address?

**Email (optional):**

eleanor.kay@scottishlandandestates.co.uk

#### 3 What is your interest in the Dairy Production Sector Plan?

**Answer:**

Scottish Land & Estates (SLE) represents Scottish land owners and rural businesses. As part of their varied interests our members are actively involved in all aspects of farming and land management including dairy production.

### Dairy Production Sector Plan

#### 4 Do you agree that the plan sets the right level of ambition for the sector?

Agree

**Please provide your thoughts here:**

As a contributor to green house gas emissions it is right for the agricultural industry to be ambitious in its endeavour to reduce emissions. We would agree that opportunities for good practice and enhanced technology exist within the dairy sector. It is right for SEPA to encourage already compliant business to go beyond compliance provided they are supported with advice and constructive guidance. We agree that solutions should be innovative and welcome the ambition that the environment be seen not as a constraint, but a platform on which economic and social success can be built.

#### 5 Does the dairy production sector plan identify the right partners and influencers for SEPA to work with to achieve our vision?

Agree

**Please provide your thoughts here:**

#### 6 Are there other opportunities that SEPA should be taking with the sector? Should dairy processors have a greater role in helping dairy producers deliver compliance and going beyond compliance?

Yes

**Please provide your thoughts here:**

Dairy processors should have a role in enabling producers to be compliant and where possible to go beyond compliance. There are many ways this can be achieved. Importantly additional audit requirements are unlikely to be the most successful mechanism. Instead producers should be encouraged to benchmark their businesses and understand their resource use efficiency. Dairy processor involvement should not reduce the financial return to producers.

#### 7 Do you agree the sector plan contains the right actions to help dairy producers reach compliance and go beyond compliance; or would a different approach to regulating the sector increase compliance?

Agree

**Please provide your thoughts here:**

We agree that all dairy producers should be compliant with existing legislation and that the achievement of this across the sector should be a priority. We would like to see SEPA take an approach that encourages and enables compliance through effective support and guidance. It is essential that SEPA staff are sufficiently trained for actions detailed in this plan. Practical solutions need to be properly explained to businesses alongside clear guidance to increase uptake.

### Dairy Production Sector Plan

#### 8 We believe that opportunities to go beyond compliance should be discussed with dairy farmers while we are on farm. Do you think this is the correct approach?

Agree

**Please provide your thoughts here:**

By identifying opportunities to go beyond compliance on-farm the opportunities will feel more achievable and questions can be asked by the farmer for their specific farming situation. This approach also creates a more joined-up process and shows SEPA as a regulator keen to help rather than looking for reasons to punish.

**9 We believe all dairy producers should farm in line with a nutrient plan. What is currently preventing this occurring? What actions would help to deliver this?**

**Answer:**

Nutrient plans are a valuable tool in improving resource use efficiency. Their use in dairy farming should be encouraged. A lack of knowledge and guidance is the most likely cause of limited uptake. Support should be available for standardised nutrient plans and guidance on interpreting results.

**10 Do you agree that having a contingency plan for adverse weather conditions would reduce environmental pollution?**

Agree

**What support does the sector need to make this happen?:**

Guidance on how planning could improve resilience to adverse weather events. Support to invest in appropriate on-farm infrastructure to improve business resilience to weather events.

**11 We believe slurry is a valuable resource, which should be applied in the right quantity in the right place, and at the right time. How can the sector and SEPA work together to drive innovation in slurry management?**

**Please provide your thoughts here:**

Encourage the use of slurry testing to understand what nutrients are available in the slurry. This can then be matched with soil nutrient maps and slurry can be applied in the most appropriate places. Guidance and support on moving to slurry delivery systems that minimise the release of GHG would also help drive innovation in slurry management.

**12 What can the sector do to increase innovation within dairy production to reduce energy use and emissions?**

**Please provide your thoughts here:**

Encourage the use of carbon footprint calculations on-farm to help business understand where energy savings could be made. Support on-farm carbon audits and resource use efficiency measurements which can be provided by Farm Advisory Service.

**13 We believe agro forestry, woody riparian zones and strategic tree planting have a role to play in improving water quality, reducing emissions and improving biosecurity within the dairy production sector. Do you agree?**

Agree

**Please provide your thoughts here:**

The use of trees and hedges on farm as a means to improve water quality, lower emissions and improve biosecurity should be encouraged. By developing clear guidelines and advice which highlights the benefits to business of introducing these measures paired with support schemes to encourage uptake then the practices are more likely to be integrated into current farming systems.