

Consultation Title	Views on Modification 5 of the SRDP 2014-2020
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From	Eleanor Kay Scottish Land & Estates Stuart House Eskmills Business Park, EH21 7PB
Telephone	0131 653 5400
Email	Eleanor.Kay@scottishlandandestates.co.uk

Less Favoured Area Support Scheme (LFASS) Measure 13

Scottish Land and Estates accepts the need to align the LFASS to new EU regulations and the reduction of payments to 80% of current levels to allow the LFASS to continue. We also see the logic behind introducing a degree of degressivity. However, this still provides little certainty for LFASS beyond 2019.

We would welcome clarification of the area threshold in which degressivity would begin to apply. Any reductions would need to be carefully phased in to allow businesses to adjust and prevent sudden disruption to businesses or the market. Whilst we accept that capping and degressivity is part of EU CAP reform, we would argue that this does not mean that it has to be an automatic part of future support. Farmers in our fragile areas continue to experience real difficulties even with the current level of LFA support – any consideration of future support has to consider what we want achieved from the LFAs and what is the best way of funding them. It is important that any proposed degressivity doesn't put additional strain on already fragile farming systems. As productive, profitable farming businesses are best placed to deliver the desired outcomes of the SRDP.

Forestry Grant Scheme (FGS) Measure 8

We welcome the widening of the scope to include Silvoarable systems and other measures to encourage the uptake of agroforestry in the industry.

LEADER Measure 19

We welcome changes to LEADER which will enable maximum support to reach rural communities.

Performance Reserve

We understand the rationale behind amending target to achievable levels to ensure funding remains within the scheme rather than being reprogrammed.