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Are you responding as an individual or an organisation?

- Individual  
 Organisation

Full name or organisation's name

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We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

- Yes

No

## Delivering our Vision for Scottish Agriculture: Proposals for a New Agriculture Bill

### A. Future Payment Framework

- a) Do you agree with the proposal set out in the consultation paper, in relation to the Agriculture Bill including a mechanism to enable payments to be made under a 4 tiered approach?

- Yes  
 No  
 Don't know

Please give reasons for your answer.

Our response to this question, and the broader consultation, is underpinned by our position that we support the Scottish Government's Vision for Agriculture in principle, and believe we need to continue to collaborate to explore the details that will determine its eventual success.

We need effective partnerships across industry, the public sector and stakeholders to enable a transition that protects the livelihoods of those who act as stewards for our land and produce the food and drink we all enjoy, as well as moving towards our social, environmental and economic goals.

Ongoing food production is critical to our food security and ongoing support will be needed to protect livelihoods, ensure food security and support farmers to receive a fair return in the supply chain. The amount of overall funding, and the length of time this is in place (likely to be needed for many years to come), will be another key determining factor.

We agree that a multi-tiered approach to payments makes sense to protect those involved in food production as well as driving changes to deliver agreed outcomes.

- b) Do you agree that Tier 1 should be a 'Base Level Direct Payment' to support farmers and crofters engaged in food production and land management?

- Yes  
 No  
 Don't know

Please give reasons for your answer.

A base level direct payment makes sense, but further discussions are needed on the detail to agree how this will work in practice.

c) Do you agree that Tier 2 should be an 'Enhanced Level Direct Payment' to deliver outcomes relating to efficiencies, reducing greenhouse gas emissions and nature restoration and enhancement?

- Yes  
 No  
 Don't know

Please give reasons for your answer.

A tiered approach makes sense but further discussions are needed between all those involved to agree how this will work in practice.

d) Do you agree that Tier 3 should be an Elective Payment to focus on targeted measures for nature restoration, innovation support and supply chain support?

- Yes  
 No  
 Don't know

Please give reasons for your answer.

A tiered approach makes sense but further discussions are needed between all those involved to agree how this will work in practice.

e) Do you agree that Tier 4 should be complementary support as the proposal outlines in the consultation paper? If so what sort of Complementary Support do you think would be best to deliver the Vision?

- Yes  
 No  
 Don't know

Please give reasons for your answer.

A tiered approach makes sense but further discussions are needed between all those involved to agree how this will work in practice.

f) Do you agree that a 'Whole Farm Plan' should be used as eligibility criteria for the 'Base Level Direct Payment' in addition to Cross Compliance Regulations and Greening measures?

- Yes  
 No  
 Don't know

Please give reasons for your answer.

We found it impossible to agree or disagree with this without knowing more detail.

For example, the consultation paper states that:

*The whole farm plan could include requirements such as a, 'Fair Work Declaration', 'Animal Health and Welfare Declaration', 'Business plan' 'Equality Duty Declaration' including opportunities for women, 'Climate, Environmental, and Nature Declarations', 'Land Management Plans', and 'Carbon, Soil and Biodiversity Audit Declarations'. The purpose of the Whole Farm Plan is to ensure farm and croft activities form the underpinning basic level of sustainability and resilience required for all businesses in receipt of public support.*

Any plan encompassing all these elements would be a significant undertaking and, if not implemented carefully, could risk the viability of food and drink production.

Further discussion is needed to agree what a whole farm plan might involve and whether this is needed vs alternative options that focus on particular outcomes.

g) Do you agree that the new Agriculture Bill should include a mechanism to ensure a Just Transition?

- Yes  
 No  
 Don't know

Please give reasons for your answer.

We cannot agree or disagree with this without knowing more detail. There are elements of the Just Transition plan (<https://www.gov.scot/publications/transition-fairer-greener-scotland/pages/5/>) we agree with, such as:

**Business and Economy:** *support a strong, dynamic and productive economy which creates wealth and high quality employment across Scotland ... and continues to make Scotland a great place to do business"*

There are also many unknowns, such as how the Just Transition contributes to the National Strategy for Economic Transformation (NSET) when the latest set of NSET [delivery plans](#) (October 2022) make no mention of food and drink.

Our concern is that more detail is needed to minimise the potential tension between the stated aims of promoting wealth and high quality employment and the need to reduce our environmental impact. This tension is not unique to agriculture and is something we have been exploring in our revised Ambition 2030 strategy.

h) Do you agree that the new Agriculture Bill should include mechanisms to enable the payment framework to be adaptable and flexible over time depending on emerging

best practice, improvements in technology and scientific evidence on climate impacts?

- Yes  
 No  
 Don't know

Please give reasons for your answer.

In principle we support using best practice and emerging evidence to adapt the payment framework. In practice we believe that this must be done extremely carefully, in consultation with all those affected and wider stakeholders and over a reasonable timeframe. These payments are fundamentally about protecting the livelihoods of those who make our food and drink and ensuring their stewardship of the land remains viable, as well as incentivising changes that will deliver the social and environmental goals. People reliant on payments cannot be expected to live in a continual state of uncertainty around their payment requirements. A 5-7 year cycle, as per the current CAP scheme, feels right but must be subject to further discussion.

- i) Do you agree that the new Agriculture Bill should include mechanisms to enable payments to support the agricultural industry when there are exceptional or unforeseen conditions or a major crises affecting agricultural production or distribution?

- Yes  
 No  
 Don't know

Please give reasons for your answer.

Mechanisms to mitigate against uncertain external conditions are vital. As we have seen in recent years, challenges can arise at any time from almost anywhere. The process for this must be robust and transparent, and further discussions are needed to ensure it is fit for purpose and has the right balance between being responsive to crises without being in continual use.

## **B. Delivery of Key Outcomes**

### **Climate Change Adaptation and Mitigation**

- a) Do you agree with the proposal set out in the consultation paper, in relation to the new Agriculture Bill including measures to allow future payments to support climate change mitigation objectives? Do you have any views on specific powers and/or mechanisms that could support such alignment?

- Yes  
 No  
 Don't know



Please give reasons for your answer.

We agree with the principle of payments to incentivise action towards climate change mitigation. We note the statement in the consultation paper that: “a draft of the next Climate Change Plan, including proposals for the whole farm emissions accounting approach, will be published in late 2023.”

This is some time away, and a lot of detail will need to be agreed between now and then, including how any payments might incentivise climate change mitigation. Our request is to remain involved in those discussions. Climate change mitigation is a complex area, and this must be reflected in what it looks like for Scotland’s agriculture.

b) Do you agree with the proposal set out in the consultation paper, in relation to the new Agriculture Bill including measures to allow future payments to support climate change adaptation objectives? Do you have any views on specific powers and/or mechanisms that could support such alignment?

- Yes  
 No  
 Don’t know

Please give reasons for your answer.

As above, we agree with this on principle, as payments can act as a clear incentive towards certain actions. The key issue is what those actions should be, and that is where further dialogue is needed. We repeat that, at a fundamental level, we need to protect food production / security and remember that these payments are designed to ensure we continue to have people acting as stewards of our rural economy and that communities do not suffer further from a lack of people. We cannot afford to lose the knowledge, hard work or passion of those who currently work our land.

c) Do you agree with the proposal, in relation to the new Agriculture Bill including a mechanism to enable payments to be made that are conditional on outcomes that support climate mitigation and adaptation measures, along with targeted elective payments?

- Yes  
 No  
 Don’t know

Please give reasons for your answer.

Elective payments would enable more flexibility for certain actions, and again the principle of paying to incentivise actions is sound and one we can support – so long as the basic fundamental principle of protecting food production is also in place.

d) Do you agree with the proposal set out in the consultation paper, in relation to the new Agriculture Bill including measures that support integrated land management, such as peatland and woodland outcomes on farms and crofts, in recognition of the environmental, economic and social benefits that it can bring?

- Yes  
 No  
 Don't know

Please give reasons for your answer.

For the reasons given above, payments can incentivise particular actions and we can support this in principle.

### **Nature Protection and Restoration**

- a) Do you believe the new Agriculture Bill should include a mechanism to protect and restore biodiversity, support clean and healthy air, water and soils, contribute to reducing flood risk locally and downstream and create thriving, resilient nature?

- Yes  
 No  
 Don't know

Please give reasons for your answer.

These are all important for Scotland's future. We support a mechanism being found to help achieve these outcomes, so long as this is done in a way that is both supportive and where those affected are involved in the decision making process.

- b) Do you believe the new Agriculture Bill should include a mechanism to enable payments that are conditional on outcomes that support nature maintenance and restoration, along with targeted elective payments?

- Yes  
 No  
 Don't know

Please give reasons for your answer.

We support conditional payments (to drive positive change) but the detail requires further discussion to ensure it is proportionate.

- c) Do you believe the new Agriculture Bill should include a mechanism to enable landscape/catchment scale payments to support nature maintenance and restoration?

- Yes  
 No  
 Don't know

Please give reasons for your answer.

We support this in principle but it will depend on the scale of payments overall and whether there is sufficient "in the pot" to support this outcome adequately.

## High Quality Food Production

- a) Do you agree that the powers in the Agriculture and Retained EU Law and Data (Scotland) Act 2020 should be extended to ensure Scottish Ministers have flexibility to better respond to current, post exit, circumstances in common market organisation and easily make changes to rules on food?

- Yes  
 No  
 Don't know

Please give reasons for your answer.

It is of course important to build in flexibility to any powers held by Government to allow it to respond to external events. The challenge is that there are significant tensions around Retained EU Law in terms of what the UK Government might seek to do, as well as whether Scotland will aim to align with EU Regulation and the implications of the Single Market Act. The reality of these, and the variance in how they might be used, means this will need to remain a live topic of discussion as we move towards developing delivery plans.

- b) Do you agree that Scottish Ministers should have powers to begin, conclude, or modify schemes or other support relevant to the agricultural markets?

- Yes  
 No  
 Don't know

Please give reasons for your answer.

As above.

- c) Do you believe the new Agriculture Bill should include a mechanism to enable payments that support high quality food production?

- Yes  
 No  
 Don't know

Please give reasons for your answer.

As with other elements of the payment framework, financial payments can incentivise and support certain activities if directed in the right way.

- d) Do you believe the new Agriculture Bill should include a mechanism to provide grants to support industry in the agri-food supply chain to encourage sustainability, efficiency, co-operation, industry development, education, processing and marketing in the agri-food sector?

- Yes  
 No

Don't know

Please give reasons for your answer.

As with other elements of the payment framework, financial payments can incentivise and support certain activities if directed in the right way. These should be flexible, generous and wide ranging to enable businesses to take advantage of the opportunities they offer.

e) Do you believe the new Agriculture Bill should include powers for Scottish Ministers to declare when there are exceptional or unforeseen conditions affecting food production or distribution?

Yes

No

Don't know

Please give reasons for your answer.

We believe it makes sense for Scottish Ministers to have these powers.

f) Do you believe the new Agriculture Bill should include powers for Scottish Ministers to provide financial assistance to the agri-food sector and related bodies whose incomes are being, or are likely to be, adversely affected by the exceptional or unforeseen conditions described in the declaration referred to in the consultation paper?

Yes

No

Don't know

Please give reasons for your answer.

We believe it makes sense for Scottish Ministers to have these powers.

g) Do you agree that the new Agriculture Bill should include the powers to process and share information with the agri-food sector and supply chains to enable them to improve business efficiency?

Yes

No

Don't know

Please give reasons for your answer.

We believe it makes sense for Scottish Ministers to have these powers.

### Wider Rural Development

a) Do you agree that the proposals outlined in the consultation paper should be included in the new Agriculture Bill?

- Yes  
 No  
 Don't know

Please give reasons for your answer.

We believe the rural economy is a critical part of Scotland's future and must be supported effectively. Food and drink businesses are the lifeblood of many rural and coastal communities, and they will require continued support to ensure they remain viable and can grow in the face of significant challenges around trade, labour and transport. We therefore agree with the proposals to support:

- Activity in and financial support for rural development and the rural economy generally.
- Activity related to the delivery of community led-local development to enable delivery of the principles identified above.
- Activity in and financial support for collaboration and the sharing of information, ideas and good practice.
- Activity in and financial support for innovation in agriculture, food production, forestry, and land management.
- Activity in and financial support for farmers, land managers, rural and island communities and stakeholders to influence policy developments.
- Activity in and financial support for public access and the understanding of land use.

b) Are there other areas relating to non-agricultural land management such as forestry that you would like considered for support under the Agriculture Bill to help deliver integrated land management and the products produced from it?

- Yes
- No
- Don't know

Please give reasons for your answer.

We believe that integrated land management can deliver positive outcomes where well managed, and support could be provided as appropriate to achieve this.

c) What other powers may be required to enable rural development in Scotland's rural and island communities?

- Yes
- No
- Don't know

Please give reasons for your answer.

We don't know but are keen to discuss further.

d) What potential social, economic or other impacts, either positive or negative, would such powers have on Scotland's rural and island communities?

- Yes
- No
- Don't know

Please give reasons for your answer.

## **Animal Health and Welfare**

- a) Do you agree that the new Agriculture Bill should include powers to establish minimum standards for animal health, welfare as a condition of receiving payments?

- Yes  
 No  
 Don't know

Please give reasons for your answer.

We agree with this in principle, for the same reasons as other conditional payments (they can help deliver important outcomes), but the detail will require further discussion.

- b) Do you agree that the new Agriculture Bill should include powers to make payments to support improvements in animal health, welfare and biosecurity beyond legal minimum standards?

- Yes  
 No  
 Don't know

Please give reasons for your answer.

We agree with this in principle but it will need further discussion to understand the detail. Any change must be well evidenced, proportionate and consider those who will be affected.

- c) Do you agree that the new Agriculture Bill should include powers to collect and share livestock health, welfare and biosecurity data?

- Yes  
 No  
 Don't know

Please give reasons for your answer.

We accept that monitoring is an important part of understanding the impact of a change.

## Plant Genetic Resources and Plant Health

- a) Do you agree that Scottish Ministers should have powers to provide support for the conservation of Plant Genetic Resources, including plants developed and grown for agricultural, horticultural or forestry purposes and their wild relatives?

- Yes  
 No  
 Don't know

Please give reasons for your answer.

We agree with this in principle.

- b) Do you agree that Scottish Minister should have the power to provide support to protect and improve plant health?

- Yes  
 No  
 Don't know

Please give reasons for your answer.

We agree with this in principle.

### **C. Skills, Knowledge Transfer and Innovation**

- a) Do you agree that support should continue to be provided in this area?

- Yes  
 No  
 Don't know

Please give reasons for your answer.

We agree with this as these are important areas to support.

- b) Is there any particular gaps in delivery that you can identify?

- Yes  
 No  
 Don't know

Please give reasons for your answer.

c) Are there any alternative approaches that might deliver better results?

- Yes  
 No  
 Don't know

Please give reasons for your answer.

d) Do you have any ideas as to how engagement/participation in advisory services, knowledge transfer or skills development might be improved?

- Yes  
 No  
 Don't know

Please give reasons for your answer.

In our view there should be a mechanism to ensure that knowledge about new and successful practices can be easily passed on and embedded in policy or across the sector to benefit others.

e) Do you agree that Scottish Ministers should have the power to establish a national reserve and regional reserve if/when required to ensure the equal treatment of farmers and to avoid distortions of the market and of competition?

- Yes  
 No  
 Don't know

Please give reasons for your answer.

Our understanding is that this would “allocate payments to prevent land being abandoned or compensate farmer and land managers for specific disadvantages that they face” which we support.

#### **D. Administration, Control, and Transparency of Payment Framework Data**

a) Do you agree that Scottish Ministers should have the power to create a system that provides for an integrated database, to collect information in relation to applications, declarations and commitments made by beneficiaries of rural support?

- Yes  
 No  
 Don't know

Please give reasons for your answer.

We agree that this is likely to help ensure a joined-up approach, which is important.

- b) Do you agree that Scottish Ministers should have the power to create a system that collects and shares information for the purposes of carrying out management, control, audit and monitoring and evaluation obligations and for statistical purposes, subject to General Data Protection Regulation (GDPR) requirements?

- Yes  
 No  
 Don't know

Please give reasons for your answer.

We agree that this is likely to help ensure a joined-up approach, which is important.

- c) Do you agree that Scottish Ministers should have the power to share information where there is a public interest in doing so, and subject to complying with the General Data Protection Regulation GDPR?

- Yes  
 No  
 Don't know

Please give reasons for your answer.

We believe that transparency is important for those involved and the general public to understand the decision-making process behind the payments framework.

- d) Do you agree that Scottish Ministers should have the power to create a system that provides a mechanism that aligns with the principles of the Scottish Public Finance Manual (SPFM) that ensures proper handling, reporting, and recovery, where proportionate, of public funds, the need for economy, efficiency and effectiveness, and promote good practice and high standards of propriety?

- Yes  
 No  
 Don't know

Please give reasons for your answer.

We agree that this makes sense.

e) Do you agree that Scottish Ministers should have the power to create a system that provides the data required to undertake administrative checks on applications / claims made by beneficiaries for rural support?

- Yes  
 No  
 Don't know

Please give reasons for your answer.

We agree this will help ensure a robust system.

f) Do you agree that Scottish Ministers should have the power to create a system whereby on-the-spot-checks should be undertaken to further verify applications / claims made by beneficiaries for rural support?

- Yes  
 No  
 Don't know

Please give reasons for your answer.

We agree this will help ensure a robust system.

g) Do you agree that Scottish Ministers should have the power to create a system that would provide for cross compliance, conditionality that covers essential standards in relation to sustainable environment, climate, Good Agricultural and Environmental Condition (GAEC), land, public and animal health, plant health and animal welfare, Soil health, carbon capture and maintenance?

- Yes  
 No  
 Don't know

Please give reasons for your answer.

We agree with this on principle as we believe a more joined-up approach to strategy and policy that impacts on food and drink will benefit all those involved.

h) Do you agree that Scottish Ministers should have the power to create a system that provides a mechanism to support the delivery of practices aligned to receipt of elective payments, for targeted outcomes?

- Yes  
 No  
 Don't know

Please give reasons for your answer.

We agree with this in principle but more detail is needed on the targeted outcomes.

i) Do you believe that Scottish Ministers should have the power to monitor and evaluate outcomes to ensure they meet the agreed purpose and help better inform future policy?

- Yes  
 No  
 Don't know

Please give reasons for your answer.

Effective monitoring and evaluation is vital to understand where further improvements are needed and that the expected changes are underway.

j) Do you believe that Scottish Ministers should have the power to seek independent assurance that outcomes are delivered appropriately?

- Yes  
 No  
 Don't know

Please give reasons for your answer.

We agree that this will enhance the ability to effectively monitor and understand the changes and their impacts.

- k) Do you agree that Scottish Ministers should have the power to enable the publication of details pertaining to recipients who receive payments including under the future payment model (outlined in the consultation paper) and set a level above which payment details will be published?

- Yes  
 No  
 Don't know

Please give reasons for your answer.

This will help ensure transparency.

- l) Do you agree that technical fixes should be made to the Agriculture and Retained EU Law and Data (Scotland) Act 2020 to ensure Scottish Ministers have all requisite powers to allow CAP legacy schemes and retained EU law to continue to operate and be monitored and regulated and also to ensure Scottish Ministers have flexibility to better respond to current, post exit, circumstances?

- Yes  
 No  
 Don't know

Please give reasons for your answer.

This will enable continued support but further discussions are needed, as outlined above, to ensure that the wider political context within the UK and EU are properly taken into account.

## E. Modernising Agricultural Tenancies

### Agreement to diversification

- a) Do you agree that Scottish Ministers should have a power to be able to determine what is an acceptable diversification?

- Yes

- No
- Don't know

Please give reasons for your answer.

We agree with this in principle but further discussions are needed to understand the detail.

- b) Do you think that if this power is given to Scottish Ministers that the Tenant Farming Commissioner should have the ability to issue guidance to assist tenant farmers and landlords understand this.

- Yes
- No
- Don't know

Please give reasons for your answer.

We agree with this.

### **Waygo and Schedule 5 of the Agricultural Holdings (Scotland) Act 1991**

- a) Do you agree that Scottish Ministers should add new activities and items onto Schedule 5 of the Agricultural Holdings (Scotland) Act 1991; to enable tenant farmers to support biodiversity and undertake climate change mitigation and adaption activity on their tenant farms?

- Yes
- No
- Don't know

Please give reasons for your answer.

We agree with this in principle but further discussions are needed to understand the detail.

- b) Do you agree that Scottish Ministers should have a power to amend Schedule 5 of the Agricultural Holdings (Scotland) Act 1991 by secondary legislation to enable Schedule 5 to be changed to meet the future challenges?

- Yes
- No

- Don't know  
Please give reasons for your answer.

We agree with this in principle but further discussions are needed to understand the detail.

- c) If you do not agree that Scottish Ministers should have the ability to vary the activities and associated items listed on Schedule 5 of the Agricultural Holdings (Scotland) Act 1991 please explain why, including any alternative approach you have to address this issue.

- Yes  
 No  
 Don't know

Please give reasons for your answer.

- d) Do you agree that when an agricultural tenancy comes to an end a tenant farmer should have certainty about the timescale by when they will receive any money due to them, and their landlord should also have a similar certainty?

- Yes  
 No  
 Don't know

Please give reasons for your answer.

**Amendment to rules of good husbandry and good estate management**

- a) Do you agree that the Scottish Ministers should be able to amend the rules of good husbandry and good estate management defined in the Agricultural Holdings (Scotland) Act 1948 to enable tenant farmers and their landlords to be able meet future global challenges?

- Yes  
 No  
 Don't know

Please give reasons for your answer.

We agree with this in principle but further discussions are needed to understand the detail.

### **Rent Reviews**

a) Do you agree that adaptability and negotiation in rent calculations are required to meet the global challenges of the future? Please explain why.

- Yes  
 No  
 Don't know

Please give reasons for your answer.

b) Are there any other relevant considerations that should be included in part of a rent review? Please explain why including any practical examples.

- Yes  
 No  
 Don't know

Please give reasons for your answer.

### **Resumption**

a) Do you consider that Scottish Ministers should amend the resumption provisions on compensation for disturbance to include a new valuation formula? And if you agree with this proposal, what do consider to be the appropriate method of valuation?

- Yes  
 No  
 Don't know

Please give reasons for your answer.

We do not know enough about this subject to form an opinion at this stage.

### **F. Scottish Agricultural Wages (Fair Work)**

a) Do you agree that Fair Work conditions, including the real Living Wage, should be applied to all Scottish agricultural workers?

- Yes  
 No  
 Don't know

Please give reasons for your answer.

We cannot agree or disagree at this stage as we do not know the full implications of making this change. Further discussions are needed to understand this.

b) What do you consider the implications would be on individual businesses and the Agricultural sector more broadly, if the minimum wage for agricultural workers was to align with the real Living Wage?

- Yes  
 No  
 Don't know

Please give reasons for your answer.

Labour costs are a significant part of the supply side pressure on agricultural businesses and any increase will likely result in higher prices which will create inflationary pressure along the supply chain.

It must also be recognised that this apparently simple lever may not lead to the positive outcomes intended if, for example, local workers are still not available and workers from abroad are still unable to travel to Scotland to work on the land.

Much of the agricultural sector is seasonal, which has a bearing on the type of employment.

The challenges of recruiting a local workforce are explored in some detail here:  
<https://www.nfus.org.uk/news/blog/why-dont-soft-fruit-and-vegetable-farms-employ-more-local-people>

### **Assessing the Impact**

- a) Are you aware of any potential costs and burdens that you think may arise as a result of the proposals within this consultation?

Please give reasons for your answer.

This needs to be explored further with specific businesses affected, who operate in a wide variety of conditions.

- b) Are you aware of any examples of potential impacts, either positive or negative, that you consider that any of the proposals in this consultation may have on the environment?

Please give reasons for your answer.

This will depend on the detail of the requirements and how this is monitored and evaluated over time.

- c) Are you aware of any examples of particular current or future impacts, positive or negative, on young people, of any aspect of the proposals in this consultation? Could any improvements be made?

Please give reasons for your answer.

Recruiting young people into the food and drink industry remains a challenge and we welcome the chance to explore this in more detail. We do not consider that the provisions of this bill will materially affect the situation at present, but this will depend on the changes it leads to.

- d) Are you aware of any impacts, positive or negative, of the proposals in this consultation on data protection or privacy?

Please give reasons for your answer.

N/A

- e) Are you aware of any examples of how the proposals in this consultation may impact, either positively or negatively, on those with protected characteristics (age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation)?

Please give reasons for your answer.

N/A

- f) Are you aware of any examples of how the proposals in this consultation might have particular positive or negative impacts on groups or areas experiencing socioeconomic disadvantage? These could be households with low incomes or few resources; families struggling to make ends meet; people who experienced poverty while growing up; or areas with few resources or opportunities compared with others.

Please give reasons for your answer.

This will depend on having a robust, transparent and well-funded payment scheme over many years.

- g) Are you aware of any examples of how the proposals in this consultation might impact, positively or negatively, on island communities in a way that is different from the impact on mainland areas?

Please give reasons for your answer.

Evidence (such as this: <https://www.ruralbrexit.scot/wp-content/uploads/2022/03/Islands-mainland-comparative-analysis-briefing.pdf>) shows that island communities tend to be more rural, have greater risk of food insecurity and have a higher proportion of agriculture-based businesses and among those, are more likely to be tenants and on smaller farms or crofts. They will therefore need careful consideration.