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Mairi Gougeon MSP
Cabinet Secretary for Rural Affairs and Islands
Scottish Government
St Andrews House
Regent Road
Edinburgh
EH1 3DG

8 March 2022

Dear Mairi,

The humanitarian crisis we're witnessing right now is truly unbelievable, but also frighteningly real. With many others, the farming community's thoughts are firmly with the Ukrainian nation and its people at this dreadful time. The conflict in Ukraine is truly tragic, and the aftershocks are being felt globally – not least the impacts on food markets due to the country's importance to the global agriculture market. These can neither be understated nor ignored.

With global supply chains already highly vulnerable, and many countries around the world reliant on Ukraine's agricultural produce as well as Russia's not insignificant food and gas supplies, a rise in grain prices or a significant drop in production is certain to have huge knock-on effects – for food consumers as well as food producers.

But physically producing commodities is only ever part of the story. When the supply and demand of grain is suddenly thrown out of kilter, the ramifications can be severe and widespread.

It is our shared responsibility to help guard against the inevitable disruptions to global food supply chains and improve the resilience of food supply.

Therefore, I write to request an expediated moratorium on current Greening Scheme rules to enable more land to be used for food production this year. In light of the uncertain impact on global food supply the war in Ukraine could cause, our counterparts across EU are asking the EU Commission to do the same.

NFU Scotland is asking that more productive arable land is made available for food production. Specifically, we are seeking a temporary suspension of Ecological Focus Areas (EFAs) requirements, and specifically the fallow and margins options.

We are in extraordinary and challenging times and that calls for effective responses wherever possible. Scotland's farmers want to play their part in efforts that look to address the growing concerns around future food security.

We would welcome the opportunity to consider our proposal with you and your officials as soon as possible.

I look forward to hearing from you soon.

Yours sincerely,

A handwritten signature in black ink that reads "Martin C. Kennedy". The signature is written in a cursive, flowing style.

Martin Kennedy
NFU Scotland President

Mairi Gougeon MSP
Cabinet Secretary for Rural Affairs and Islands
Scottish Government

March 8, 2022

Dear Cabinet Secretary,

We are writing to you in the context of the shocking, ongoing acts of aggression against Ukraine and the resulting impact upon global food production. This is clearly a tragic situation and all of us stand in solidarity and support for the people of Ukraine.

This letter is a direct response to related comments from NFU Scotland, as reported on BBC Scotland's *Good Morning Scotland* radio programme on Tuesday, March 8. According to the report, the NFUS is calling for the temporary suspension of greening rules, specifically around Ecological Focus Areas, so that more land can be made available for crop production.

We are aware of similar discussions at an EU level, with calls for what would amount to a rolling back on sustainable food policy objectives within the EU Farm to Fork and Biodiversity strategies.

Scottish Environment LINK Food and Farming group members are deeply disappointed to see farming unions both in Scotland, and the UK, arguing for the lowering of environmental standards using the dubious pretext of food security.

Their argument is flawed for several reasons. Firstly, there is no shortage of wheat, with stocks at 37% of annual usage, despite poor harvests in North America last year. The FAO predicts average or above-average yields of wheat and of total cereals this year. No-one knows at this stage how the conflict will affect exports.

Secondly, we know that almost 80% of our cereal harvest in Scotland is used for alcohol production or animal feed. Around two-thirds of the EU cereal harvest is used for animal feed or biofuel. Feeding grain to animals (even the most efficient ones) means converting 3 or 4 units of human edible calories or protein to 1 unit. We can 'afford' to do this because there is no shortage of cereals.

Thirdly, we know that tackling the climate and nature emergency is the only way to ensure long-term food security. The poor harvest in North America last year was caused by drought, while this was counterbalanced by good harvests in India and Australia. As the climate becomes more chaotic, the risk of multiple harvest failures in different parts of the world increases.

Finally, the current lobbying is based on the false premise that farming and nature are a zero-sum game. Scotland is committed to becoming a world leader in sustainable and regenerative agriculture. The way forward – for Scotland, for Europe, and globally is farming **with** nature.

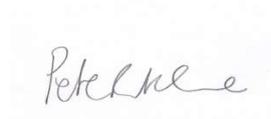
The real lesson of this crisis is that we must look at the resilience of our food and farming systems. More than ever, we must shift towards environmentally friendly farming practices, such as agroecology, organic farming, and agroforestry, which provide the only path to ensure long-term food security, food sovereignty, and the overall sustainability of food systems.

Simply growing more grain is not the answer. We need to think about the use and costs of nitrogen-based fertilisers and focus instead on the ways in which we can fix nitrogen naturally, and how we can use grass and food waste rather than wheat for animal feed.

We should maintain and improve Ecological Focus Areas, not drop them. We should be adopting a strategic approach to land use, and the current atrocities in Ukraine should not be used as an excuse to undermine efforts to tackle the twin climate and nature emergencies.

We encourage you to hold to the vision statement published last week and continue to support nature-friendly, climate-friendly farming in Scotland. We would be more than happy to discuss these issues with you directly, and in more detail, if you have the time to do so.

Best regards,

A handwritten signature in black ink, appearing to read "Pete Ritchie", is centered within a light blue rectangular box.

Pete Ritchie

On behalf of
Scottish Environment LINK Food and Farming Group



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Cabinet Secretary for Rural Affairs and Islands
St Andrews House
Regent Road
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10 March 2022

Dear Cabinet Secretary,

I am writing to you in the context of the deeply concerning situation in Ukraine. As a global network, WWF is providing colleagues in the region with support, and we're relieved that currently all WWF-Ukraine staff are safe.

This letter responds to related calls from NFU Scotland – as reported in BBC Scotland's *Good Morning Scotland* on 8th March – to temporarily suspend greening rules, specifically around Ecological Focus Areas. While we can understand concerns about food security and affordability in the context of this supply chain shock, we don't support the call for ending vital protections for the environment, as it risks exacerbating one crisis in the face of another.

We therefore echo the concerns outlined by Scottish Environment LINK's Food and Farming group members, most notably that tackling the climate and nature emergency is essential to guaranteeing resilience in our food systems. Ecological Focus Areas play an important role in safeguarding and enhancing nature, and they should be maintained, not suspended, even on a temporary basis.

While the situation is so volatile, it is too early to say what impact the conflict will have on the availability and price of cereals. What we do know is that in Scotland, almost 80% of cereals grown and harvested are used in alcohol production or as animal feed, while at EU level two-thirds of cereals harvested are used for animal feed or biofuel. We must ensure that our response to supply chain shocks is based on the best evidence, looks at the food system as a whole, and does not create any perverse outcomes that could worsen the climate and nature crises.

If Scotland is to become a world leader in reducing emissions and halting biodiversity loss, then the Scottish Government must continue to support nature and climate-friendly farming. A move towards regenerative farming practices is the only way to support sustainable food systems that will play an essential role in underpinning food sovereignty.

We welcomed Scottish Government's recently published vision for agriculture, and support the aims and vision contained within it. Like our colleagues at Scottish Environment LINK, we would encourage you to hold to the vision of this statement.

We were also very encouraged by the First Minister's firm commitment in recent days to keep Scotland on its path towards Net Zero. Climate action and environmental protection will ensure that we have a sustainable and resilient economy and meet our global commitments.

We would be happy to discuss these issues in more detail.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Lang Banks', is written over a thin horizontal line.

Lang Banks

Director, WWF Scotland

From: [REDACTED]
Sent: 03 October 2022 14:21
To: [REDACTED]
Subject: FW: AECS Request/Local Derogation

For upload to eRDM

From: [REDACTED]
Sent: 11 August 2022 13:46
To: Quinlan K (Kevin) <Kevin.Quinlan@gov.scot>
Subject: AECS Request/Local Derogation

Dear Kevin,

I write to you on behalf of NFUS, if you are not the correct person, if you could forward this request on I would be most grateful.

As you will be aware, some areas of Scotland are experiencing extremely dry weather. This is particularly so in the North East of Scotland where issues are quite acute. Just this week, I'm sure you will have heard about drought issues reported by SEPA, and plans for irrigation bans in order to safeguard water supplies. This is impacting on many crops and fodder for grazing livestock, whilst adding an additional stress to the industry when it is already feeling considerable impacts of rising input costs.

NFUS is asking Scottish Government to consider applying a local derogation for farmers in the North East from AECS requirements that require them to destroy green manure. We would like Scottish Government to allow for farmers with green manure the opportunity to harvest this for livestock feed. This action will help alleviate issues being caused by the ongoing dry weather which has resulted in poor grass growth and shortage of second cut silage.

I look forward to your response.

Best wishes,

[REDACTED]

[REDACTED]

NFU Scotland | Rural Centre, West Mains, Ingliston, Newbridge, EH28 8LT

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