

# Response ID ANON-8UYC-6NT5-P

Submitted to **Support for Agriculture and the Rural Economy - Post Brexit Transition**

Submitted on **2018-08-15 16:07:13**

## Direct Payments (Pillar 1)

### 1 Do you agree with the stability approach described here? Please provide comments.

**Do you agree with the stability approach described here? Please provide comments.:**

No, for two reasons.

First, the paper talks about a civic conversation about the future of farm support.

In the public mind, this is linked to questions about food - and the Good Food Nation policy: do we want to be eating more food from Scotland in Scotland? Are we prepared to pay more for that, either at the till or through public support to farmers who otherwise will be priced out of the market?

It's linked to questions about fairness: much of the farm support goes to wealthy farmers and landowners while other farmers struggle to make ends meet.

Practices in the supply chain are often unfair to farmers - and also to other workers in the supply chain.

It's linked to questions about landscape and nature: how we want Scotland to look, and how farming and land use can enhance rather than diminish this, not just to promote tourism, but because it's also the right thing to do.

It's linked to questions about climate change, and about farmed animal welfare.

It's linked to questions of governance: who decides how should land be owned and used?

It's linked to questions about scale and connectivity: is there any particular value to small farms and urban agriculture, and if so what?

It's linked to questions of health: how does the way we farm impact on agricultural workers' health, and on what we eat?

The paper asks no questions about that civic conversation, how it could be conducted, when it should start, or what topics it should cover. This gives us no confidence that serious thinking is going on in government about how to have that conversation.

Second, the paper talks about a transition period but is almost entirely focused on tweaking the existing scheme's architecture.

While we recognise the political uncertainty, and the current vulnerability of many farming businesses, there should be a clearer message from the top of this paper that land-based direct payments will form no part, or a (much) smaller part of farm business support post-2024. (This second scenario is likely to be the case even if Scotland remains in the EU and the slowly-evolving CAP).

We fully recognise too that farming businesses need some certainty about future support payments, and that for many businesses these are crucial to survival, so we support the Government's efforts to provide that certainty in the short term.

However, the proposals as they stand convey an overall 'keep calm and carry on' message which is at odds even with the NFUS 'Change' message.

We agree with the objectives set out in the document of the 'comprehensive new rural policy'

1 to protect and enhance the natural assets on which our farming and other rural industries depend;

2 to contribute to Scotland's world leading climate change ambitions;

3 promoting efficient and innovative rural businesses and thriving rural communities.

We also agree with the Government that public support should assist

'farmers, crofters and other land managers to also diversify their businesses and develop opportunities to integrate into a wider rural economy, enhance their role as stewards of our natural environment, and embrace an integrated approach to land use which seeks to deliver multiple benefits from the land. '

However, the document should spell out more clearly that the current model of farm support is not fit for purpose in promoting these objectives.

We agree with Prof Alan Matthews that the current Pillar 1 payments are 'inefficient, ineffective and inequitable'. As he says 'They do not serve well the purpose of income support of those most needy, nor do they serve food security, efficiency of resource use, nor the delivery of rural environmental services and moving to a more productive and sustainable agriculture. '

We agree with his conclusion that 'they should be systematically reduced and resources switched to provide targeted assistance, including transitional adjustment assistance, to help farmers adapt and rise to the specific challenges of improving productivity, resource efficiency and risk management, and to pay farmers to provide specific environmental and other public goods. For the land management aspect of the policy this should be done by replacing the concept of entitlements with contracts for services.'

Nourish would want to see a much clearer message that the transition period (which we support) is a transition and not simply a deferment: that there will be a fundamental change of pattern post 2024 and considerable disruption in the run-up to that. Government should support the industry through that transition, but businesses must expect and plan for significant change in how they operate.

### 2 How might the annual application process for direct payments be adjusted to deliver with a lighter touch for those with little year-on-year change in their business?

**How might the annual application process for direct payments be adjusted to deliver with a lighter touch for those with little year-on-year change in their business?:**

There is an opportunity for bold thinking here between December 2020 and March 2024. Assuming we are not in the CAP, direct payments will be removed or greatly reduced post March 2024 - for example with progressive reductions in the cap over the four years to £25,000 per business, and key greening measures implemented through regulation rather than through payments.

Current recipients of higher payments could be given a clear commitment (ideally with cross-party support prior to 2021 election) of indicative payments over 3-4 years.

Rather than being land-based, direct payments if they continue for a further five years could be related to say farming jobs safeguarded in marginal areas, with set payments of say £5,000, £10,000 etc. - essentially social cohesion payments. Recipients would have to apply with a business plan and then submit accounts and evidence of employment. These payments could be agreed on a 3 or 5 year cycle.

Some direct payments could be used as exit bonds to support farmers leaving the sector to retire or start new businesses.

**3 Are there operational changes in our delivery of Direct Payments that you would like the Government to consider during the transition period?**

**Are there operational changes in our delivery of Direct Payments that you would like the Government to consider during the transition period?:**

See above: the main goal must be to use the transition period to close down the current land-based model.

**4 Do you support the continuation of some or all CAP rules on inspections and compliance during the Transition period, bearing in mind that Scotland will still need to comply with the rules of the World Trade Organisation (WTO)?**

**Do you support the continuation of some or all CAP rules on inspections and compliance during the Transition period, bearing in mind that Scotland will still need to comply with the rules of the World Trade Organisation (WTO)?:**

Moving away from a land-based model will remove some of the mapping compliance complexity.

Raising the environmental floor and mainstreaming compliance/inspection into SEPA or a new agency allows for design of a proportionate and risk-based system of inspections, best practice advice and fines.

**5 Do you have any suggestions for straightforward changes that would improve the environmental outcomes achieved through greening payments in Pillar 1?**

**Do you have any suggestions for straightforward changes that would improve the environmental outcomes achieved through greening payments in Pillar 1?:**

Policy effort would be better spent developing the post 2024 architecture and working backwards to rebalance spend on environmental outcomes and spend based on land area.

**6 Considering how funding is currently distributed across CAP schemes, do you have initial views about how the balance between these schemes should change in future to maximise outcomes?**

**Considering how funding is currently distributed across CAP schemes, do you have initial views about how the balance between these schemes should change in future to maximise outcomes?:**

Yes, see above.

We need to keep going back to what we are trying to achieve with this funding (and how this links to the SDGs, and National Performance Framework) and then design a scheme from fresh, with clear ideas about how to measure success.

There is no justification to pay people for owning land (and when we pay tenants that money goes back to the owners as rent).

As decisions on this will progressively be taken at Holyrood, we need to work out a new social contract between the public and our farmers/land managers, through an extensive and informed civic consultation. From the LINK survey on public attitudes to farm payments, we already have some ideas about what the public in Scotland want to support farmers to do, we now need to build an informed cross-party consensus on outcomes and on the core funding principles.

**7 Do you agree that changes to capping are a useful measure to enhance the positive social and environmental impact of agricultural policy?**

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Yes

**8 Do you have any specific views on how capping should work including what a maximum cap should be?**

**Do you have any specific views on how capping should work including what a maximum cap should be? :**

We see a progressive cap as a mechanism for releasing money from an ineffective area-based approach so it can be used to support specific policy objectives. We would like to see the existing 'Pillar 1' scheme entirely phased out, both in the EU and in Scotland.

We would see the cap reducing from £100,000 in 2020 to £25,000 by 2024.

**9 Should there be a maximum cap on the total funding a business receives from all schemes, or a scheme-by-scheme approach?**

**How can the aims of LFASS be better achieved/would you prefer to see alternative methods of providing support?:**

There should be a scheme by scheme approach as the schemes are designed for different purposes.

As stated above, we would see the existing area-based Pillar 1 being phased out, and in any case tightly capped.

We would want to see a rigorous approach to Food Processing and Marketing Grant and any similar future grant scheme for capital equipment to ensure that public investment is justified and necessary.

Future forestry grant schemes should be calibrated to ensure that the rate of return for landowners is proportionate: currently government pays for the initial investment, then pays each year for each acre of land in trees, and claws nothing back when the timber is sold. We should be moving to a system where landowners are paid for sequestering carbon using the Woodland Carbon Code and any planting grant is seen as an advance on that.

#### **10 How can the aims of LFASS be better achieved/would you prefer to see alternative methods of providing support?**

##### **How can the aims of LFASS be better achieved/would you prefer to see alternative methods of providing support?:**

LFASS has little rationale. If there are good environmental or social reasons to keep people farming in difficult places, we should design a scheme which makes that possible.

#### **11 Would you see value in directing future LFA support through other existing Direct Payment Schemes?**

##### **Would you see value in directing future LFA support through other existing Direct Payment Schemes?:**

No. LFA support should be tailored to specific areas and sectors to deliver environmental and social benefits. LFASS should be tapered to zero in its current area-based formulation and reinvested in a more targeted way.

#### **12 Do you think there are administrative and operational simplifications that would benefit current or future LFASS claimants?**

##### **Do you think there are administrative and operational simplifications that would benefit current or future LFASS claimants?:**

see above - LFASS should be phased out in its present form

#### **13 Would you support a simplified approach to scheme use of map information or to the land mapping system and, if so, do you have views on where the main opportunities for doing so would lie?**

**Would you support a simplified approach to scheme use of map information or to the land mapping system and, if so, do you have views on where the main opportunities for doing so would lie? :**

#### **14 Do you support the use of regional pilots to help tailor schemes to local circumstances?**

##### **Do you support the use of regional pilots to help tailor schemes to local circumstances? :**

We see benefits in moving towards a more regionalised approach to design and delivery of farm support, reflecting regional geographies and priorities.

Regional land use frameworks should be developed with stakeholders as part of the planning system, agreeing indicative land use and regional priorities for delivering environmental, economic and social benefits from the land.

Alongside developing these regional frameworks, we see value in establishing a number of 'pathfinder' areas where communities, land managers and other actors develop and test new approaches to farm and rural support. These pathfinder areas would facilitate informed civic conversations and help to develop new narratives.

#### **15 Do you have views on how the inspections regime could be made more efficient while retaining existing public benefits?**

##### **Do you have views on how the inspections regime could be made more efficient while retaining existing public benefits? :**

#### **16 Do you have views on how the penalty regime – particularly around fairness, transparency, the maintenance of standards and compliance burden – could be improved in the short-term?**

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#### **17 Are there specific issues you think the SimplificationTask Force should prioritise for review?**

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#### **18 Do you agree with the proposals to set a timescale of up to five years for transition? Please provide comments.**

##### **Do you agree with the proposals to set a timescale of up to five years for transition? Please provide comments.:**

Yes. But the five years have to be a transition, not a deferment - if Scotland leaves the EU, in 2024 the current schemes will no longer be operating. There will be no Pillar 1 and Pillar 2.

Nourish would argue for the overall farm support budget to be maintained at its current level; however from 2024 this money will flow to different places for different purposes. Some individual businesses which face the prospect of massively reduced subsidy income will have to start planning for change now.

Support for businesses and households to adapt has to be on hand from the start of the transition period, not come in at the end. The direction of travel has to be clear from early in the transition period, even if the precise destination and the detailed route is not yet clear.

There are many uncertainties just now, but the Scottish Parliament and Government will end up with the power to decide on Scotland's agricultural policy and budget, within UK and international agreements. Scottish Government needs to send a clear signal (reflecting the views of all stakeholders that the current

support system is fundamentally flawed , and that change is not just about simplification, inspections or penalties), that:

- it intends to retain a rural/farm support budget at the same level, but reshape entirely how it is spent
- paying people simply to own and farm land will not continue
- the new support system will be designed to deliver and report on clear measurable outcomes linked to the Sustainable Development Goals and National Performance Framework and will be audited alongside other government programmes

**19 If new schemes seek to encourage collaboration, enhance skills development, help with capacity building, facilitate wider integration into the supply chain, promote carbon audits and monitoring of the soil health, how might pilot projects be best designed to help test and develop new approaches?**

**If new schemes seek to encourage collaboration, enhance skills development, help with capacity building, facilitate wider integration into the supply chain, promote carbon audits and monitoring of the soil health, how might pilot projects be best designed to help test and develop new approaches?:**

This question, and the text above it in the consultation document, reflects a mindset that the future arrangements will be an add-on or modification of the current scheme. What is needed is first clarity of outcomes and then system redesign, probably including significant changes in delivery (for example regionalisation, multi-annual contracts, loans rather than grants, changes in role of RPID).

Of course the new arrangements should improve soil health, raise skill levels and reduce greenhouse gas emissions from farming: but these objectives can be delivered through a variety of approaches (such as a requirement for continuing professional development, carbon markets and voluntary offsetting schemes, regulation etc), as well as through a farm by farm scheme.

**20 Many of the measures described in this consultation will have co-benefits for both agricultural productivity and for reducing Scotland's Greenhouse Gas Emissions. Are there other practical and feasible measures that would have similar co-benefits that you feel should be considered?**

**Many of the measures described in this consultation will have co-benefits for both agricultural productivity and for reducing Scotland's Greenhouse Gas Emissions. Are there other practical and feasible measures that would have similar co-benefits that you feel should be considered?:**

Yes.

- 1) Compiling the nitrogen balance sheet and using a combination of targeted regulation and advice to reduce the current N surplus which has not declined in 10 years.
- 2) A decisive policy shift to organic production in Scotland, with benefits for productivity and profitability (domestic market and export premiums) as well as climate change and biodiversity.
- 3) Major investments in agroforestry at farm and landscape scale; and making it easier for all farmers including tenants to plant and benefit from productive woodlands on their farm.
- 4) Major investment in benchmarking and producer organisations in livestock sector, learning some of the lessons from Origin Green to produce the same level of output but at lower emissions per kilogram of product.
- 5) Implementing a requirement for all farmers to test soils on a regular cycle for pH and organic matter, with these results uploaded to a centralised platform to inform the national picture.
- 6) A scheme to pay farmers to sequester soil carbon, drawing on experience of schemes in Austria, Australia, and other places.

**21 Do you agree to expanding the number and role of Monitor Farms or similar during the transition period? Do you have any ideas as to how Monitor Farms could be refined or adapted to better meet future needs?**

**Do you agree to expanding the number and role of Monitor Farms or similar during the transition period? Do you have any ideas as to how Monitor Farms could be refined or adapted to better meet future needs? :**

Rather than simply doing more of the same, we would advocate an independent external review of the skills and knowledge landscape in Scottish agriculture and horticulture - including vocational training, higher and further education, continuing professional development, knowledge transfer and exchange (including monitor farms) , sector attitudes and perceptions, likely future occupations and job roles and the requirements for new skills and knowledge.

It may be that the model of Environment and Economic Interest Groups which operates in France as part of the agroecology policy would be more effective than monitor farms - and it's worth looking at the wider landscape before committing to more monitor farms.

**22 Do you agree with the proposal to look at moving towards a more performance based approach to compliance, using key performance indicators and better information?**

**Do you agree with the proposal to look at moving towards a more performance based approach to compliance, using key performance indicators and better information?:**

We agree that funding should be directed towards outcomes, and that recipients of funding should report on those outcomes.

We also agree that eligibility for funding should include criteria such as membership of a producer organisation or co-operative, providing benchmarking data, engaging in continuing professional development. We recognise that some businesses may need time and support to meet these requirements and this would form part of the transition period.

**23 Do you have views on the types of indicator that should be used or areas of priority action within the operation of current CAP schemes?**

**Do you have views on the types of indicator that should be used or areas of priority action within the operation of current CAP schemes?:**

**Scottish Rural Development Programme (Pillar 2)**

**24 Given the importance of continuity of support for the forestry sector and that the target for new woodland is to increase to 15,000 hectares by 2025, should the current the Forestry Grant Scheme continue broadly in its current form until 2024 or can you suggest other**

**short-term changes that would better achieve these policy aims?**

**Given the importance of continuity of support for the forestry sector and that the target for new woodland is to increase to 15,000 hectares by 2025, should the current the Forestry Grant Scheme continue broadly in its current form until 2024 or can you suggest other short-term changes that would better achieve these policy aims? :**

We would encourage an even more proactive approach, making it easier for farmers to have more trees on their land. For example, the Forestry Commission could lease land from farmers for 30-50 years and manage the planting , maintenance and harvesting directly.

Proactive advice should also be offered to all farmers - as well as general promotion of the scheme, advisors should make appointments to visit farmers and explain the financial benefits and how trees can contribute to rather than detract from the farm's overall productivity and profitability.

There is still a widespread view among farmers that planting trees shows that you have failed at farming, and changing this culture requires a proactive and engaging approach.

If we want farmers to integrate trees with crops and livestock, we need to have a more integrated approach to farm advice and farm support.

**25 In considering the current Forestry Grant Scheme, are there opportunities to improve the administrative efficiency of the scheme?**

**In considering the current Forestry Grant Scheme, are there opportunities to improve the administrative efficiency of the scheme? :**

The current agroforestry scheme is not fit for purpose and has not been promoted effectively, which is why no schemes have been approved. A much more flexible approach is needed.

**26 Given the importance of continuity of support for environmental outcomes, should the current Agri-Environment Climate Scheme continue broadly in its current form until 2024 or are there short-term changes that could be introduced to i) simplify and streamline the scheme, ii) improve customer experience and/or iii) enhance the delivery of environment and climate change objectives?**

**Given the importance of continuity of support for environmental outcomes, should the current Agri-Environment Climate Scheme continue broadly in its current form until 2024 or are there short-term changes that could be introduced to i) simplify and streamline the scheme, ii) improve customer experience and/or iii) enhance the delivery of environment and climate change objectives?:**

The following short-term changes should be introduced:

- 1) Investment in facilitation (including early stage facilitation) of co-operative proposals for delivering environmental outcomes at landscape levels
- 2) Testing out payment for results
- 3) Major investment in organic conversion (along with supply chain support for Scottish UK and international markets)
- 4) Experimental carbon sequestration schemes
- 5) Using regional land use frameworks and Pathfinder projects to identify local and regional evidence base and public priorities for the environment

**27 Are there new emerging environment or climate change priorities that need particular focus under the Agri-Environment Climate Scheme in the next three - five years?**

**Are there new emerging environment or climate change priorities that need particular focus under the Agri-Environment Climate Scheme in the next three - five years?:**

See above.

Nourish would want to see a commitment to agroecology as the basis for future agricultural policy in Scotland, recognising that all forms of agriculture should 'protect and enhance the natural assets on which our farming and other rural industries depend' .

The current split of support for production in P1 and support for the environment in P2 reinforces the view that these two goals are separate. All production systems must be designed to leave the soil, water, air and ecosystem in a better shape, and to minimise greenhouse gas emissions without compromising animal welfare.

**28 Considering the current New Entrants Capital Grant Scheme, are there opportunities to improve the administrative efficiency of the scheme?**

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**29 Considering the CAGS in its current form, are there opportunities to improve the administrative efficiency of the scheme?**

**Considering the CAGS in its current form, are there opportunities to improve the administrative efficiency of the scheme?:**

**30 Should the scope of what can be funded be reviewed, for example in terms of adding in new elements and restricting total spend on some projects?**

**Should the scope of what can be funded be reviewed, for example in terms of adding in new elements and restricting total spend on some projects?:**

**31 Do you have initial views on the proposal to close the Small Farms Grant Scheme?**

**Do you have initial views on the proposal to close the Small Farms Grant Scheme?:**

**32 Would there be customer benefits if the CAGS, small farms capital grant scheme and the new entrants capital grant scheme were combined?**

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**33 Considering the current FPMC scheme, are there opportunities to improve the administrative efficiency of the scheme?**

**Considering the current FPMC scheme, are there opportunities to improve the administrative efficiency of the scheme?:**

**34 Would you wish to see other aspects of this scheme changed in the short-term?**

**Would you wish to see other aspects of this scheme changed in the short-term?:**

Interest-free loans might be more useful for smaller businesses looking to invest £25k or less. Low-interest or interest free loans rather than grants seem a more equitable approach in any case.

It seems that some highly successful businesses are able to attract grants at quite a high intervention rate and it would be interesting to assess how many of these investments would have gone ahead anyway.

**35 Do you have views on priority issues to be considered by any pilots during the transition period?**

**Do you have views on priority issues to be considered by any pilots during the transition period?:**

This refers to enhanced capital support for farm businesses.

Many farm businesses have significant capital assets (land, buildings, machinery, livestock) compared to their turnover, yet some are still under-capitalised and could be safer, greener and/or more productive with a new shed or piece of kit.

However, other businesses in similar situations take out loans or sell assets to invest in new ones. An interest-free loan scheme (such as the Energy Saving Trust operates) would be more equitable than grants. Other financial mechanisms are possible: Government could take an equity stake in farmland to be repaid only when land is sold (like Help to Buy) ; or some land could be leased for 30-40 years to a forestry company and that lease in turn could be capitalised to fund new investments.

More generally, we would propose greater integration of capital grants and loans - including FPMC - with local economic development through a LEADER type approach. This allows integration with existing local authority economic support and other developments in the rural economy outside farming - for example, opportunities to repurpose farm sheds for new businesses.

**36 Is the LEADER approach something that you could support?**

**Is the LEADER approach something that you could support?:**

A LEADER type approach (with more streamlined administration) is potentially of great value in integrating support to farm businesses with other local economic development activity, using the local knowledge of the IAGs and the local authority.

There is no problem if these next version Leader schemes take on different priorities or work in different ways to reflect local circumstances.

**37 Considering LEADER in its current form, are there other opportunities to improve the administrative efficiency of the scheme?**

**Considering LEADER in its current form, are there other opportunities to improve the administrative efficiency of the scheme?:**

**38 Do you have initial views on the proposal that SRDP broadband support would cease?**

**Do you have initial views on the proposal that SRDP broadband support would cease?:**

**39 Do you have any thoughts on the form, content and delivery methods for future advice?**

**Do you have any thoughts on the form, content and delivery methods for future advice?:**

Advice is key to a successful transition, and a significant investment will be required in the transition period, as many more farms than usual will be making major changes.

As suggested above in relation to the Monitor Farms, there would be value in taking an overall look at the current advisory activity in terms of focus, uptake, quality and effectiveness. While there may be some logic in separating one-to-many services from one-to-one services, there is a strong case for a coherent overall approach to advice, training and knowledge exchange.

Some advisors will not currently have the skills, knowledge and attitude needed to deliver the change required.

Closer links between advice, research and policy will be needed. The Pathfinder areas provide an opportunity for this sort of closer collaboration, with advisors working closely with small groups of farmers and drawing on expertise from research colleagues.

**40 Do you have any views on the balance of advice delivered by one-to-one and one-to-many methods?**

**Do you have any views on the balance of advice delivered by one-to-one and one-to-many methods?:**

It is hard to get a sense of this. There is a wide spread of one-to-many activities but it is hard to assess impact on competence or performance, and those attending are not doing so as part of continuing professional development.

One-to-one advice is likely to feature prominently in the transition period as businesses consider how to adapt to the new support regime, whether through delivering social and environmental outcomes, improving profitability of the current enterprise, co-operating with others or diversifying into new products and services.

**41 Do you have any views on how delivery of advice can be better linked to delivery of results?**

**Do you have any views on how delivery of advice can be better linked to delivery of results?:**

It may be that a one-to-few model would be effective - establishing local groups like the Economic and Environmental Interest Groups in France and using advisors to facilitate knowledge exchange and feed in specific information/ideas/links to research.

**42 Considering the Knowledge Transfer and Innovation Fund (KTIF) scheme in its current form, are there opportunities to improve the administrative efficiency of the scheme?**

**Considering the KTIF scheme in its current form, are there opportunities to improve the administrative efficiency of the scheme?:**

**43 Do you have any views on the effectiveness of KTIF and how the aims of the scheme could be promoted in the future?**

**Do you have any views on the effectiveness of KTIF and how the aims of the scheme could be promoted in the future?:**

The scheme is not sufficiently innovation-oriented. It is not clear how many Operational Groups have been established or how well connected the scheme is to the EIP-Agri.

On knowledge transfer and exchange, it is hard to see why the scheme is separate from the advisory service.

We would support efforts to foster innovation during the transition period. However, KTIF in its present form is not doing that effectively. Engaging with people and agencies outside the sector might be helpful, for example NESTA, and encourage a more imaginative and less risk-averse approach.

**44 Would you support a similar type of scheme going forward?**

**Would you support a similar type of scheme going forward?:**

Yes. The concept of a 'national herd' is important here, and the sense of shared custody. Additional data which is already being generated but not collated (eg national calving interval, age and weight at slaughter, post-mortem results) could also be usefully integrated into the scheme along with new data such as medication use.

**45 Would you support a future approach that aims to deliver similar increases in efficiency through the direct payment support mechanisms?**

**Would you support a future approach that aims to deliver similar:**

We should certainly expect any farmer in receipt of public funds to be testing their soil, having nutrients management plans, and measuring their greenhouse gas emissions. However, there is also value in a sector-specific initiative to improve production efficiency, especially in the ruminant livestock sector where the gap between the top quarter and the long tail is so wide.

We need to learn from other countries where these sectors - even if they include many small businesses - operate coherently as part of a supply chain and have an orientation to co-operation, benchmarking and continuous improvement.

**46 Do you see a continuing role for the Scottish Rural Network (SRN) and, if so, do you agree that its current aims and objectives should be maintained during the transition period?**

**Do you see a continuing role for the SRN and, if so, do you agree that its current aims and objectives should be maintained during the transition period? :**

No. We would see these resources deployed to support more focused initiatives in the transition period

**About you**

**What is your name?**

**Name:**

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**Are you responding as an individual or an organisation?**

Organisation

**What is your organisation?**

**Organisation:**

Nourish Scotland

**The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:**

Publish response with name

**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

## **Evaluation**

**Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)**

**Matrix 1 - How satisfied were you with this consultation?:**

Slightly dissatisfied

**Please enter comments here.:**

While it helpfully set out at the start some of the current complexities, it ended up with a set of very detailed 'insider' questions.

That's fine for the first horizon issues: but it doesn't give space within the response template for any of the wider civic conversation which it advocates, nor does it make any proposals or invite any suggestions for how that conversation might take place.

**Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:**

Slightly satisfied

**Please enter comments here.:**

It was confusing at times to relate the questions to the consultation text