

4 February 2025

Dear Members of the Rural Affairs and Islands Committee,

### **Scottish Statutory Instrument on Whole Farm Plan**

When the Agriculture and Rural Communities Bill (Scotland) was passed last year, an extensive [report on the impacts of island agricultural businesses](#) was kept under wraps until the parliamentary debate had taken place. MSPs did not have the chance to consider the findings of the report before voting on the framework bill. This scenario must not repeat itself now that the details of future policy are to be determined.

Ahead of the passage of the SSI introducing the requirement for farmers and crofters to do a whole farm plan, many issues appear to remain unresolved. Please find a non-exhaustive list of questions below. We are of the opinion that without significantly more clarity on these issues, the SSI should not be passed.

1. What evidence has been collated to ensure that the policy change in question complies with the government's commitment to a just transition for existing small producers (according to BRNs)?
2. Has a Business Regulatory Impact Assessment (BRIA) been conducted on the introduction of the Whole Farm Plan requirement?
3. What are the compliance costs associated with the policy for any business depending on hectareage and land category? Has modelling on this been undertaken?
4. What are the individual costs associated with the elements of the Whole Farm Plan if carried out by an advisor:
  - For the animal health and welfare plan?
  - For the carbon plan?
  - For the habitats report?
  - For the Integrated pest management plan?
  - For soil analysis?
5. For the elements that are deemed to be possible to be carried out by crofters themselves, how many hours are required for an average person not familiar with the respective tools to complete each element?
6. What are the implications in terms of cost and time for crofters if other additional requirements such as cross-compliance conditions on muirburn and GAEC are taken into account?

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7. What funding will be available to do the assessments required by the whole farm plan?
8. What was the rationale to discontinue the crofter subscription for the Farm Advisory Service given the fact that crofters will be in need of more advice in the future in relation to the newly introduced requirements?
9. Will the Preparing for Sustainable Farming (PSF) funding be continued in 2025 and onwards?
10. What improvement for the environment is anticipated to be delivered by the habitat assessment?
11. Why is carbon sequestration of land-based activities not taken into account in the carbon audit?
12. Why does the government see it as necessary and proportionate that soil analysis must be conducted on individual region 1 land parcels extending to 1 hectare or less?
13. Why does the government see it as necessary and proportionate that an integrated pest management plan must be conducted if, for example, agricultural lime is applied on parcels extending to 1 hectare or less?
14. What happens to the data provided by crofters on carbon audits, soil analysis, pest management, and animal health and welfare)
15. Will the assessments required by the whole farm plan be linked to the natural capital tool? If yes, how? If no: why not?
16. Why is the instrument being introduced when there are no corresponding sanctions for non-compliance? Of what use is it without any penalties?

We thank you in advance if you should raise these questions with the Minister for Agriculture and Connectivity, Jim Fairlie, when discussing the SSI introducing the Whole Farm Plan. Without satisfactory responses to these concerns, we do not see the new policy conforming with the Scottish Government's commitment to ensuring a just transition.

Kind regards,



Donna Smith, Chief Executive

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