Scotland's climate coalition

Rural Affairs Committee: Call for Views on Rural Support Plan

Response from Stop Climate Chaos Scotland

August 2026

Introduction

Stop Climate Chaos Scotland (SCCS) is Scotland's climate coalition, bringing together over 70 civil society organisations campaigning together on climate change. Together, we represent hundreds of thousands of people across Scotland and stand in solidarity with communities most affected by climate impacts around the world. We encourage decisionmakers to deliver fair, effective policies to reduce emissions.

At the end of the last session of Parliament, the Scottish Government published its finalised Climate Change Plan (CCP). This plan illustrates the significant role of emissions from agriculture. Along with the Rural Support Plan (published on the same day), it also shows that policies to reduce these emissions are limited, that these emissions will not fall significantly and that, as a result, **agriculture is expected to become the highest-emitting sector during the 2030s.** SCCS strongly welcomes the Committee's inquiry into these issues, and the invitation to give oral evidence in September.

The support schemes and funding allocation within the current Rural Support Plan will not achieve the emissions reductions required by Scotland's carbon budgets, will not sufficiently support farmers and crofters to adapt, diversify and build resilience to a changing climate, and will not achieve the outcomes in the Agriculture and Rural Communities (ARC) Act that was passed by the Scottish Parliament in Session 6. Swifter, more substantial change is needed - within the current Rural Support Plan and even more so in the next Rural Support Plan.

Below, we provide some context below submitting responses to the questions in the Call for Views (starting p. 6). We focus primarily on the links between agriculture and climate. The changes we propose will ensure that farming and crofting can become sustainable, economically and environmentally, and that the change is managed through a just transition. Continuing on the current path (that essentially seeks to maintain the *status quo*) risks a chaotic and unfair transition. The current path also contributes to the need for the CCP to include over-ambitious targets for NETs (Negative Emissions Technologies). Addressing agriculture emissions more effectively would reduce this need and contribute to a more realistic, evidence-based path to net zero.

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Context

Scotland's *climate is changing*, and is predicted to change further and faster in the coming years[1]. These changes will impact agriculture, with more heatwaves, wildfires and drought, and more rain, storms and floods. Research from WWF Scotland has highlighted the economic impact of extreme weather events on Scottish agriculture: in 2017-18 alone it cost Scottish farmers £161 million due to livestock losses and lower crop yields[2]. As a result, *agriculture itself will change* as it will need to adapt.

Climate change makes agricultural transformation inevitable. **Scotland faces a choice: allow this change to be reactive and unjust, abandoning farmers to bankruptcies and extreme weather, or manage it through a just transition.** Agricultural policy must evolve to support a managed shift.

Crucially, the severity of these climate impacts depends on emission reductions. By meeting its targets, Scotland can inspire global action while implementing local solutions. Currently, however, the Government's response is lacking. The pressing need for a managed transition stands in stark contrast to the limited ambition of the Climate Change Plan and the status-quo focus of the Rural Support Plan.

Emissions from agriculture

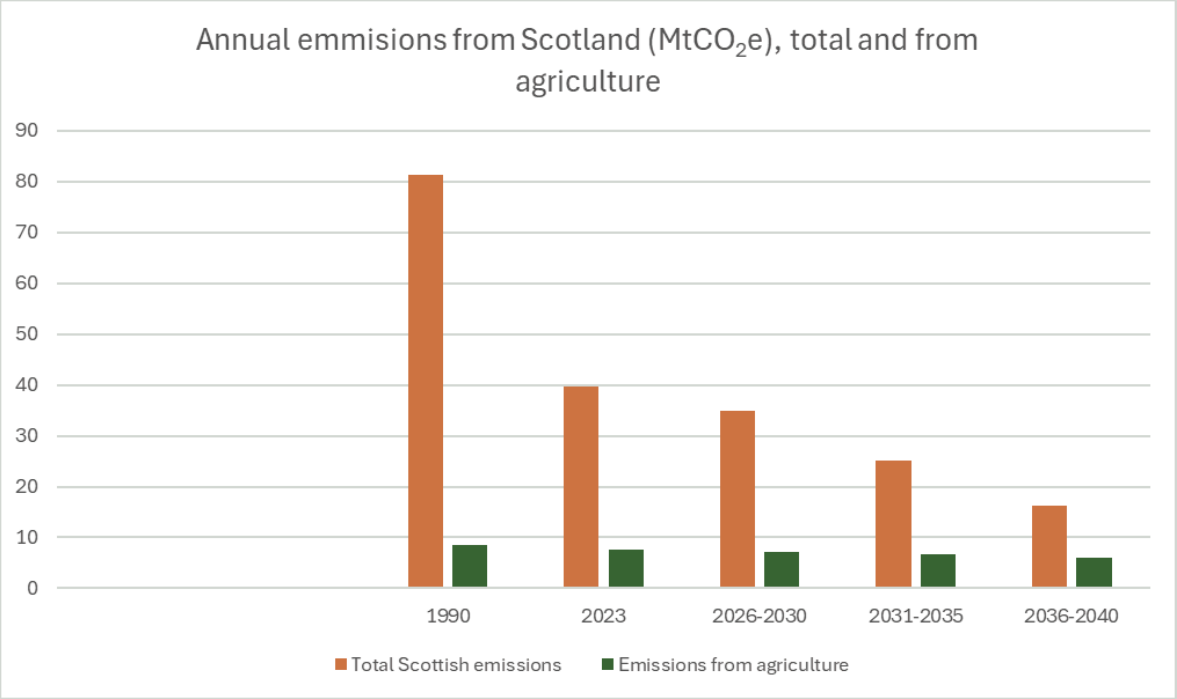
In 2024, the last year for which data is available, emissions from agriculture amounted to 7.5MtCO_2e. **This is a fall of just 13.7% from the 8.6 MtCO_2e in 1990 – contrasting with Scotland's total reduction for that time of > 50.5%, and some sectoral reductions of over 60 or even 90%[3].** For the future, the Scottish Government's Climate Change Plan (CCP) sets out an emissions pathway for agriculture, as below:

Greenhouse Gas Emissions Projection per 5 year period in MTCO2e from Agriculture[4]	
2026-2030 Carbon Budget 1	36.3
2031-2035 Carbon Budget 2	33.7
2031-2035 Carbon Budget 3	30.2

It is claimed that this "pathway to net zero will see [annual] agricultural emissions reduce to 5.8MtCO2e by 2040". This would be a reduction of just 22.6% over three carbon budget periods. This contrasts to a 61% reduction in transport emissions, 61% for business and industry, 45% for residential and public buildings, and 58% for waste management over the same period.

[1] https://adaptation.scot/scotland-and-climate-change/climate-change-trends-and-projections/ and https://www.theccc.org.uk/publication/a-well-adapted-uk/
[2] https://www.wwf.org.uk/sites/default/files/2023-09/The-impact-of-extreme-weather-events-on-Scottish-agriculture.pdf
[3] https://www.gov.scot/publications/scottish-greenhouse-gas-statistics-2024/
[4] https://www.gov.scot/publications/scotlands-climate-change-plan-2026-2040-annexes/pages/11/

Planned emissions reductions in agriculture over the next 15 years are far lower than in all other sectors, and this has been the case for the past 25 years. These past and future emissions for agriculture and for Scotland as whole are illustrated in the diagram below, based on emissions data and the carbon budgets presented in the Climate Change Plan.



It should also be noted that the CCP pathway suggests that "***agriculture is expected to become the highest-emitting sector in Scotland during the Third Carbon Budget period***"[5]. The Climate Change Committee (CCC; the Scottish Government's official advisers on climate), have indicated that *"there are significant risks for agriculture due to the lack of detail in the Agricultural Reform Programme"*[6] *on policies to reduce emissions.*

Scottish Government policy on agriculture emissions

The future pathway for agriculture emissions is the result of policy decisions that have allowed farming to reduce emissions at a much slower rate than all other sectors of the economy and society. It is also a deliberate policy decision not to follow the recommendations set out by the CCC in their advice on carbon budgets. The difference in projected emissions is illustrated below.

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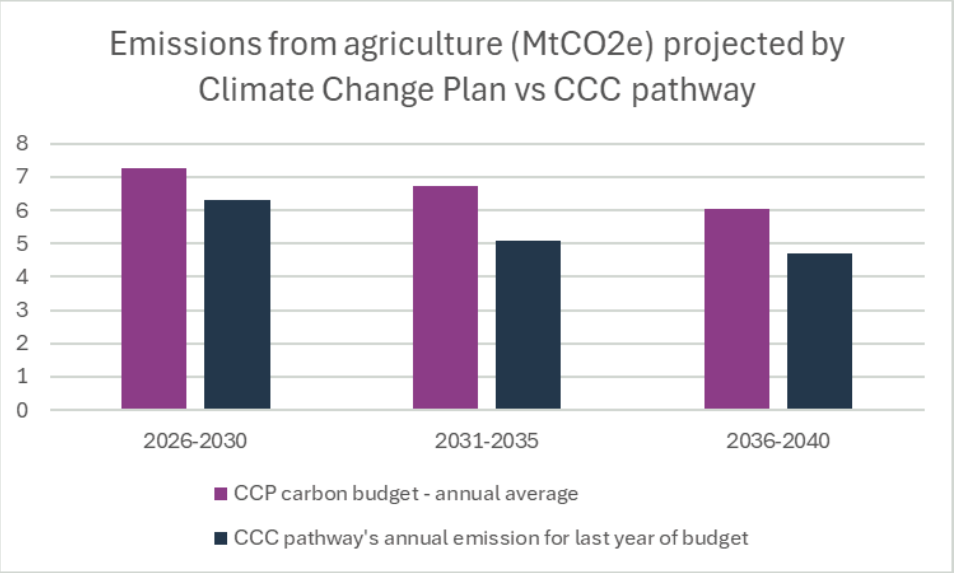
5 https://www.theccc.org.uk/wp-content/uploads/2026/02/Progress-reducing-emissions-in-Scotland-2025-report-to-Parliament-34378gfhdk928365sjfge.pdf (page 36)

6 https://www.theccc.org.uk/publication/progress-in-reducing-emissions-in-scotland-2025/



This different approach was foreshadowed in the June 2025 'indicative statement' published when the carbon budget regulations were introduced to Parliament. This said:

> "*The Climate Change Plan will not follow all the policies for agriculture set out in the CCC's balanced pathway, and will prioritise meeting our climate and nature obligations in a way which works for Scotland.*"[7]

The Scottish Government is entitled to make these choices, but the consequence is that the emissions from the agriculture sector will be higher than proposed in the CCC pathway. **This has knock-on implications for the wider economy and society – which will be required to make greater emissions reductions and/or removals to meet our carbon budgets.** To a great extent, the finalised Climate Change Plan relies on the projected deployment of unreliable and unlikely Negative Emissions Technologies (NETs)[8] to compensate for the limited reductions in emissions from agriculture.

The CCC highlighted "*the lack of detail in the Agricultural Reform Programme*" – and, since that comment was made, the Rural Support Plan has been published. Environmental groups have warned that **the plan represents a "lost decade" to support farmers and crofters to meet Scotland's climate and nature targets**[9]. The plan sets out the Scottish Government's intention to retain the *status quo* until 2030, when a modest proportion of the budget will be moved from the "Tier 1" direct payments into other funding envelopes.

In response to the publication of the Rural Support Plan, the Convener of Scottish Environment LINK's Food and Farming Group, said:

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[7] https://www.gov.scot/binaries/content/documents/govscot/publications/speech-statement/2025/06/statement-accompany-climate-change-scotland-act-2009-scottish-carbon-budgets-amendment-regulations-2025/documents/statement-accompany-climate-change-scotland-act-2009-scottish-carbon-budgets-amendment-regulations-2025/statement-accompany-climate-change-scotland-act-2009-scottish-carbon-budgets-amendment-regulations-2025/govscot%3Adocument/statement-accompany-climate-change-scotland-act-2009-scottish-carbon-budgets-amendment-regulations-2025.pdf

[8] https://www.stopclimatechaos.scot/what-are-nets-and-is-there-a-catch/

[9] https://www.scotlink.org/scotlands-farming-plan-not-fit-for-purpose-say-environmental-groups/

> *"Farming is on the frontline of climate impacts, with extreme weather and rising temperatures making it harder to produce food. We urgently need to help the industry to reduce emissions, restore nature, and become more resilient to a changing climate. … The plan will see Scotland maintaining an ineffective and unfair system of payments for a decade after the chance for reform, and only modest changes even then"*[10].

There is widespread concern that current Scottish Government agriculture policies are too focused on maintaining current support systems. In essence, the focus of the agriculture proposals in the CCP is primarily on efficiency measures rather than more substantial changes. This extension of the unsustainable *status quo* is likely to result in an unmanaged and unjust transition and piecemeal adaptation to climate change. **Agricultural support policies need to be reviewed and revised – with the clear objectives of helping farmers to better mitigate and adapt to climate change**.

The current policy approach to agriculture is inadequate to deliver the necessary change, for farmers and for our climate. It means that the CCP is overly reliant on carbon capture and other Negative Emissions Technologies (NETs) in order to deliver a pathway to net zero for Scotland.[11] These technologies rely, to a great extent, on expensive (both costly and inefficient), unreliable and unproven technologies[12]. Both SCCS and previous Parliamentary Committees[13] have called for **a 'Plan B' setting out how emissions reductions will be achieved if NETs do not deliver.** Deeper and faster reductions in emissions from agriculture should be considered an essential part of such a 'Plan B'.

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[10] *ibid*

[11] https://www.stopclimatechaos.scot/wp-content/uploads/2026/01/Draft-CCP-briefing-and-recommendations-from-Stop-Climate-Chaos-Scotland.pdf

[12] The Intergovernmental Panel on Climate Change (IPCC) ranked CCUS as among the least effective and most expensive ways to meet 2030 climate targets; see: https://www.ciel.org/wp-content/uploads/2022/04/IPCC-Unsummarized_Unmasking-Clear-Warnings-on-Overshoot-Techno-fixes-and-the-Urgency-of-Climate-Justice.pdf. See also https://projects.propublica.org/why-carbon-capture-cant-solve-climate-change/ for evidence that CCS delivery rarely matches projections – unlike renewables that have a track record of exceeding projections.

[13] See e.g. https://webarchive.nrscotland.gov.uk/20240327055221mp_/https:/archive2021.parliament.scot/S5_Environment/Reports/ECCLR_2021.03.04_OUT_CS_CCPu_Report.pdf

Response to Call for Views questions

Structure of support schemes

Overall, SCCS believes that the four-tier framework is appropriate, but considers that **reform within this framework (towards achieving the objectives in the ARC Act and the Strategic Outcomes in the Rural Support Plan (RSP)) should be faster and clearer.** There is a danger that, without such reform, the *status quo* not only fails to deliver the necessary emissions reductions and the targets set under the Natural Environment Act; it also fails to support farmers and crofters to adapt to changing weather patterns and increasingly frequent extreme weather events, resulting in farms becoming uneconomical.

The Scottish Government currently provides around £677 million per year in public support to agriculture. This is dominated by direct payments, which account for around 80% of the total budget, primarily as area-based income support (which pays subsidies on the basis of land area, rather than the nature/scale of the farming carried out).

In practice, this approach fails in a number of ways:

- it delivers few environmental benefits, while providing 'easy' support for current management practices has the effect of discouraging positive action for nature and climate;
- it is unfair to farmers and crofters, with the majority of funding flowing to larger farms with better-quality land with conversely the least reward accruing to those who deliver most public benefit[14]; and
- its top-down, prescriptive approach disempowers farmers and crofters while doing little to reduce dependency on ongoing support, with most farms reliant on support to remain profitable.

In the immediate term, within the current Rural Support Plan, SCCS and our members are calling for:

- **Increased funding for AECS**, to help farmers and crofters incorporate more climate-friendly farming, increase climate resilience on-farm, and help prepare them for the future support framework under the Agricultural Reform Programme. (Scottish Environment LINK state that AECS must be increased by between £31m and £59m/year, **including an increase in the organics budget** to reach £20m/year by 2030.[15])
- **Increase budget for agroforestry** (LINK state that £5m - £10m/year is needed.[16])

[14] See, e.g. https://www.holyrood.com/comment/view,big-farmer-agricultural-subsidies-are-too-heavily-concentrated-in-the-hands-of-large-landowners

[15] https://www.scotlink.org/wp-content/uploads/2026/02/Steps-for-farming-policy-26-28-briefing.pdf (see p. 2, pp. 4-5)

[16] https://www.scotlink.org/wp-content/uploads/2026/02/Steps-for-farming-policy-26-28-briefing.pdf (see p. 2, pp. 4-5)

- **Increased support for early adopters of agroforestry, organics and other regenerative farming practices.** We need a farmer-led skills pipeline for regenerative farming, with a large increase in training and peer-to-peer learning and support, beyond the Knowledge Transfer & Innovation Fund and Farm Advisory Service.

Both agroforestry and organics were highlighted by the Farming for 1.5C inquiry as having high potential for carbon savings while also enabling higher returns for farmers.

The recent conflict in Iran caused the cost of fertiliser and other synthetic inputs to spike, underscoring the financial benefits of reducing dependency on such inputs by moving towards organic or 'multifunctional' farming (including agroforestry). That will only increase if the coming CBAM applies to fertiliser.

WWF Scotland research has highlighted that with 40% uptake, organic farming has the potential to deliver emissions reduction of 730 kt CO2e.

Agroforestry (integrating trees on farm) has the potential to reduce emissions without significantly reducing, and even increasing, the productive potential of a farm.[17] It can increase livestock productivity by protecting pasture, providing protection for livestock from adverse weather, and improving animal health and welfare.

More of the budget must be allocated to tiers 2-4, to support more emissions reductions and less reliance on costly and unproven NETS. RSPB have called for **25% of the budget to go to Tiers 3 and 4 in the short term; this change should be made during the current RSP period**. The change could start in 2030-31, while still keeping the Scottish Government's commitment to maintain the current level of direct payments until 2030. In the longer-term, **beginning with the Rural Support Plan for 2032-2037,** SCCS and Scottish Environment LINK are calling for **75% of the budget to go to Tiers 2-4 (vs the current 41%)**, **in order to achieve the objectives in the ARC Act.** There must be a more comprehensive revision of the support provisions to proactively manage the transitions that are necessary. Capping and redistributing Tier 1 and 2 funding to higher tiers would make farm funding 'work harder' to achieve desired outcomes.

The key principle is that a much higher percentage of rural payments should support climate- and nature- friendly farming, with stronger conditionality on Tiers 1 and 2. In particular, this should include

- Revising the four-tier framework so that less funding is tied up in Tier 1 direct payments and more is allocated to Tiers 2, 3 and 4;
- Retaining some income support, but making it fairer, more targeted and less dominant;
- Incorporating elements of current agri-environment schemes into Tier 2, to encourage more people to implement them.
- Expanding agri-environment funding as it moves into Tiers 2-4, including outcome-based approaches.

[17] Farming for 1.5°C report, p. 31.

- Introducing a Nature and Climate Friendly Farming Scheme that rewards a wide range of positive actions through flexible, non-competitive payments;
- Redesigning Less Favoured Area Support to explicitly reward High Nature Value farming and crofting built around fewer animals, producing higher quality outputs, more profitably.
- Shifting a percentage of support for livestock farming from Tier 1 to Tier 2, and including conditions such as incorporating agroforestry or peatland restoration where appropriate, or meeting organic standards.
- Increasing the focus on landscape-scale nature restoration that supports carbon sequestration (absorption), and changing eligibility requirements so that farmers working in collaboration with their neighbours are prioritised for support.
- Increased training and skills pipeline for regenerative farming practices.

There should be more incentives and increased support in Tiers 3-4 for farmers of livestock to incorporate agroforestry on-farm, where suitable. The Agriculture and Rural Communities Act (2024) does include powers to support farms and crofts to diversify and increase resilience in this way[18]. This contrasts with the current approach, where livestock numbers are declining due to market and dietary trends, but there is no policy to support farmers and crofters through this change (see also annex 1).

Timescales, clarity and stakeholder engagement

Overall, SCCS considers that reform could and should be faster. The Scottish Government's Vision for Agriculture states that *"We will transform how we support farming and food production in Scotland to become a global leader in sustainable and regenerative agriculture."* This is a clear direction of travel, but the RSP does not provide enough clarity on how this will be achieved.

The direction of travel (towards achieving the Vision, the objectives in the ARC Act and the Strategic Outcomes in the RSP, including climate change mitigation) should be clearer, to give farmers and crofters more certainty, further in advance. For example, the RSP annex on Support Schemes says about Enhanced Greening measures: "We will start out using the current Greening requirements and make changes over time." This is not nearly enough detail to allow farmers and crofters to plan for the coming changes.

During production of the next Rural Support Plan, environmental and climate organisations should be involved in the process, to help ensure that the Plan provides sufficient support for the necessary transition. We would suggest that the CCC (Climate Change Committee) is also given the opportunity to input into and feed back on the Plan, before it is published, because the Rural Support Plan is a key lever for delivering the Climate Change Plan and meeting Scotland's carbon budgets.

[18] See Schedule 1, Parts 2, 3 and 4 of the Agriculture and Rural Communities (Scotland) Act 2024

Funding

The proposals for funding changes outlined in the Rural Support Plan

Our proposals for changes in funding schemes are set out in the 'Structure of Support Schemes' section (see above).

Climate change plan – clarity around delivery

We support the recommendation of the previous Rural Affairs and Islands Committee to "Monitor the linkages between the implementation of agriculture policies in the Climate Change Plan with the Rural Support Plan, the wider agricultural reform programme, the food and drink supply chain, and the Scottish Government's progress against its agriculture, forestry/tree planting and peatland restoration targets."

As demonstrated in our contextual introduction, the overall emphasis in both the CCP and the Rural Support Plan is on maintaining the *status quo*, albeit with marginal adjustments. This contrasts markedly with the analysis of the "Farming for 1.5ºC group"[19]. This independent panel of farming industry representatives, academics and policy professionals, co-sponsored by the National Farmers' Union of Scotland and Nourish Scotland (an SCCS member), **concluded that a "transformation" in Scottish agriculture was needed.** They noted that:

> *"These changes collectively represent as great a change to Scottish farming within a generation as the change from horses to tractors. They can and must be achieved fairly. Farmers who want to play their part in this transformation can and must have profitable businesses and good livelihoods if Scotland is to have a just transition to net zero"*[20].

This group further recommended that "*this wholescale change should be supported with the creation of a Transformation Steering Group, with high level representation from across government departments, key stakeholders, including working farmers, and scientists*". Other recommendations focused on soil management, agricultural biogenic methane emissions, nitrogen management and renewable energy; they also highlighted the invaluable importance of knowledge sharing and technical support.

SCCS supports the approach suggested by the "Farming for 1.5ºC group". But few, if any, of the recommendations from this expert group are reflected in the policies set out in the RSP, the CCP or other Scottish Government policy.

This situation is untenable and unsustainable – it needs to be revisited as:

- The current pathways fail to deliver sufficient emissions reductions;

[19] https://www.nourishscotland.org/projects/farming-for-1-5c/
[20] https://40a7f11d-664a-4fd7-a550-78ec00356167.filesusr.com/ugd/e828e0_20e4a2135025430aa3613a05100b76dd.pdf

- The current approach will not support farmers and crofters to transition in the face of a need to reduce emissions and/or to adapt to inevitable climate change (especially unpredictable, more extreme weather events); and
- The current approach requires the Scottish Government, to sustain their welcome commitment to overall net zero, to adopt an over-reliance on NETs (which are unlikely to materialise[21]).

In the immediate term, **SCCS encourage the Committee to recommend:**

- **An increase in the budget for agroforestry of £5m-£10m per year; and**
- **An increase in the AECS budget by between £31m and £59m/year, including:**
- **An increase in support for organics in AECS (to reach £20m p/a by 2030) with an associated target of reaching 10% of agricultural land under organic management by 2030.**[22]

In 2024, a report for the Woodland Trust and Soil Association set out the benefits and costs of scaling up agroforestry[23]. It suggested that £10m or more per annum would double the area of land currently under agroforestry and farm woodland. That calculation is based on 10% of agricultural holdings participating in one of six options (silvopastoral low density trees, silvopastoral tree enclosures, silvoarable alley cropping, boundary hedges, biodiverse hedges, small woodland) at an average payment of £2,000 per farm. Such an approach provides a mechanism to increase carbon sequestration and storage, in the agriculture sector, over and above that projected in the CCP.

Organic farming is an agricultural system that can make a major contribution to addressing climate change whilst producing the food we eat; it is also more nature-friendly. Organic production in Scotland falls far short of what is possible and environmentally desirable. This also means that Scotland's farmers are missing out on a significant and growing market. Between 2015 and 2020, retail sales of organic produce doubled in the EU and the organic area increased annually by 5.7%.

However, in Scotland, a total of £41.6m has been spent on 707 AECS contracts for organic since 2015. This is an average of £4m a year over 10 years. During this period, the organic land area in Scotland reached 3.3% (or 168,000ha) by 2025[24] - just short of the 'doubling' target set at the start of the last Parliamentary session in 2021. However, this remains lower than in, say, 2002 when the organic land share was close to 8% (so it is, in fact, a decline) – and far lower than the EU's 10.5%[25].

We support calls to double the area of land in Scotland currently under organic management by 2031, which would reach close to 8% .[26] This would require increasing

[21] https://www.stopclimatechaos.scot/what-are-nets-and-is-there-a-catch/ and https://projects.propublica.org/why-carbon-capture-cant-solve-climate-change/

[22] https://www.scotlink.org/wp-content/uploads/2026/02/Steps-for-farming-policy-26-28-briefing.pdf (see p. 2, pp. 4-5)

[23] https://www.soilassociation.org/media/27364/farm-tree-payments-scotland-final-report-060624.pdf

[24] https://www.gov.uk/government/statistics/organic-farming-statistics-2025/organic-farming-statistics-2025-united-kingdom

[25] https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Developments_in_organic_farming

[26] Organics target briefing: https://www.scotlink.org/wp-content/uploads/2026/07/LINK-PfG-Organic-Target-Briefing.pdf

investment annually somewhere towards £20m p/a by 2030. Additional funding of c.£4-£8 million p.a. in the next few years would make progress towards this target - as well as reducing emissions, increasing carbon sequestration and storage over and above that projected in the CCP.

Other simple changes in practice that should be supported by policy and appropriate incentives, producing 'quick wins' for emissions reduction, include:

- reducing the use of artificial nitrogen fertilisers[27];
- more diverse grassland swards including legumes/herbs to reduce nitrogen requirements on grass;
- integrating grazing livestock into arable rotations (increases carbon storage in soils and reduces need for nitrogen); and
- the use of cover crops where appropriate to improve soil carbon sequestration.

All of these measures would provide multiple benefits: they are good for the soil, good for nature, good for the climate, and good for the farm bottom line. In addition, it must also be noted that agriculture in Scotland is a significantly gendered sector, with entry into farming still shaped by gendered inheritance patterns which tend to privilege sons, women being underrepresented in ownership and leadership roles, and a lack of time being a major barrier to advancing women's roles on-farm and in farming organisations. Yet, small scale agroecology and other climate or nature friendly farming systems tend to be more gender diverse[28]. Thus, these changes can also provide benefits from a gender justice perspective.

In the medium term, **more support must be available to livestock farmers to adapt to systems producing higher quality outputs, more profitably, with fewer animals.** Annex 1 below explores the issues related to diet, livestock and climate. Scottish Government policy needs to address this clearly and coherently, and not leave livestock farmers to deal with the impacts of changing markets without sufficient support to adapt.

The CCC's balanced pathway for Scottish agriculture assumes a 26% reduction in livestock by 2035. The Scottish Government has decided not to develop policy to reduce livestock numbers. However, we would expect to see as a minimum, a percentage of support for livestock farming shifting from Tier 1 to Tier 2, and including conditions such as incorporating agroforestry or peatland restoration where appropriate, or meeting organic standards. Within Tiers 1 and 2 there should be more support for livestock farmers who meet these enhanced conditions, and, after sufficient notice, less support for those who do not. In addition, policy related to agriculture and livestock should be more consistent with policies related to food and trade (Annex 2).

Longer-term, SCCS considers there is a need for a clear and proactive policy to achieve more environmentally-friendly rearing of fewer livestock. SCCS supports the

[27] The use of these fertilisers generate emissions in several ways: in their manufacture and distribution, and in increasing soil emissions, etc - https://www.nature.com/articles/s41598-022-18773-w
[28] https://www.tandfonline.com/doi/full/10.1080/15528014.2026.2652039

continuation of a livestock sector within Scottish agriculture, but one that is transformed into producing fewer, higher quality, higher value animals – often managed organically or as part of nature-friendly farming systems.

On adaptation to the impacts of climate change, this is an important part of the Climate Change Plan, but too few of the support schemes set out in the Rural Support Plan directly support farmers to adapt. There should be greater focus throughout the tiers on implementing measures that help farmers and crofters adapt, diversify and increase resilience.

Any other reflections on the plan

There need to be improved linkages between the monitoring and reporting requirements related to the implementation of agriculture policies in the Climate Change Plan, the Rural Support Plan, the wider agricultural reform programme, policies related to the food and drink supply chain/exports, as well as the Scottish Government's progress against its forestry/tree planting and peatland restoration targets. At present, many of these policies and their related reporting appear to operate independently – and the synergies/trade-offs are not (openly) recognised or monitored.

One example of such synergies/trade-offs is that, with the adoption of a more ambitious programme of emission reduction policies in the agriculture sector (as proposed above), the CCP would, in turn, be able to reduce its reliance on NETs. By reducing reliance on these overly expensive, unreliable and improbable technologies[29], the credibility of the CCP, as well as the likelihood of achieving its ambitions, would be significantly enhanced.

To enable greater scrutiny of the next Climate Change Plan, and the agricultural policies within it, we recommend that the Committee write to the Scottish Government requesting that they publish the next Climate Change Plan in December 2030, instead of March 2031, so the Scottish Parliament has time to scrutinise the final plan before Parliament is dissolved for the pre-election period.

Annex 1 - Livestock Policy

One crucial part of the debate relating to agriculture and climate change is the emissions from livestock. This is a complex and nuanced issue.

The Scottish Government has stressed that "*there is no policy to reduce livestock numbers*" and "*this Government will not bring forward policy to reduce livestock*

[29] https://www.stopclimatechaos.scot/what-are-nets-and-is-there-a-catch/ and https://projects.propublica.org/why-carbon-capture-cant-solve-climate-change/

numbers"[30]. The finalised CCP did not include any proactive policy to reduce livestock numbers; however, it implicitly suggested that some reduction will occur (presumably because of wider land use changes and market/consumption patterns), and it does not set out any policy to prevent this reduction.

The CCC's advice on Scotland's carbon budgets explicitly recommended "*a reduction in livestock numbers driven by both reductions in meat consumption across the UK and measures to incentivise farmers to diversify income streams*"[31]. The Committee's comments on the draft CCP noted that "*livestock numbers have been steadily declining in Scotland, as has UK-wide meat consumption, which is the biggest market for Scottish meat. The draft CCP includes no proactive measures to reduce livestock numbers beyond projections based on these existing long-term trends*"[32].

As the above makes clear, any discussion of livestock numbers or policy is related to the issue of diet, and to Government policy/advice on diet. Yet the finalised CCP is entirely silent on the issue of diet, although it must be assumed that the implicit acceptance of declining numbers built into the baseline reflects an assumption that UK-wide dietary trends will continue.

The draft CCP's silence on diet and food system appears to be inconsistent with current policies for public health. Current NHS advice is that "if you … eat more than 90g (cooked weight) of red or processed meat a day, it is recommended that you cut down to 70g"[33]; yet, "32% of adult meat consumers in Scotland exceed" this recommended level[34]. The 70g per person per day target is also reflected in the Scottish Government's "Dietary goals for Scotland"[35].

In SCCS' view, **the absence of any proactive policy on diet, food system or livestock numbers in the final CCP is negligent.** This is a crucial area for emissions reductions from the agriculture sector which could and should be more ambitious. However, the absence of any proactive policy masks the implicit acceptance of long term UK-wide trends and livestock number reductions built into the baseline. **This increases the chance of an unmanaged and unjust transition.**

Thus, SCCS considers there is a need for a clear and proactive policy – to manage a transition to healthier, more sustainable diets with lower average meat consumption, based on more extensive and environmentally-friendly rearing of fewer livestock. **SCCS**

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30 https://www.gov.scot/binaries/content/documents/govscot/publications/speech-statement/2025/06/statement-accompany-climate-change-scotland-act-2009-scottish-carbon-budgets-amendment-regulations-2025/documents/statement-accompany-climate-change-scotland-act-2009-scottish-carbon-budgets-amendment-regulations-2025/statement-accompany-climate-change-scotland-act-2009-scottish-carbon-budgets-amendment-regulations-2025/govscot%3Adocument/statement-accompany-climate-change-scotland-act-2009-scottish-carbon-budgets-amendment-regulations-2025.pdf

31 https://www.theccc.org.uk/publication/scotlands-carbon-budgets/#post-51897-_Toc197514379

32 https://www.theccc.org.uk/publication/progress-in-reducing-emissions-in-scotland-2025/

33 https://www.nhs.uk/live-well/eat-well/food-types/meat-nutrition/

34 https://eprints.gla.ac.uk/326624/

35 https://www.gov.scot/binaries/content/documents/govscot/publications/factsheet/2016/03/scottish-dietary-goals-march-2016/documents/scottish-dietary-goals-march-2016/scottish-dietary-goals-march-2016/govscot%3Adocument/Scottish%2BDietary%2BGoals%252C%2BMarch%2B2016.pdf

supports the continuation of a significant livestock sector within Scottish agriculture, but one that is transformed into producing fewer, higher quality, higher value animals – often managed organically or as part of nature-friendly farming systems. Indeed, in many areas, extensive livestock production helps to deliver the government's biodiversity objectives, as part of a High Nature Value farming system,

If support systems were reformed appropriately, such a sector should also be more profitable and economically sustainable - as well as delivering the necessary emissions reductions.

In response to ongoing/projected diet changes and the CCC advice, the Scottish Government should be focusing more on diversification and, in acknowledgement of the impact of livestock farming, should be seeking minimum standards for recipients of agricultural funding such as organic standards and trees on farms, where livestock continues to be the main agricultural output.

Annex 2 - Food security[36]

One argument used against further or faster reform of agriculture policy is that the *status quo* is necessary to feed the nation and maintain food security. It is often suggested that policies to reduce emissions and/or improve biodiversity will contribute to an end to active farming in part or all of Scotland. Such arguments contribute to unnecessary polarisation and resistance to change.

In considering 'food security' arguments, it is important to understand the context and the relevant policy objectives.

- First, for individuals, families and wider society, 'food security' means being able to afford sufficient food and/or food that comprises a healthy, sustainable diet. Yet, in Scotland 6-8% of households experience chronic food insecurity, through insufficient access and consumption of nutritious food and only 52.5% of households spend enough on appropriate foods to comply with the Eatwell Guide. Of course, addressing those matters is a question for wider economic and social policy as well as agriculture - but it should be noted that "Scotland's mix of production does not correspond to the Scottish recommended guidelines for healthy sustainable diets". Our NHS diet guidelines are not reflected in current agricultural policy.

- Secondly, from a 'national' perspective, 'food security' might mean being able to access sufficient food from 'domestic' producers - and reducing reliance on imports. Yet **domestic consumption accounts for only 33% of what we produce** (across all crops, milk, and livestock) - **the majority of our agricultural production is targeted to non-food use and/or exports**. 48% of the arable land in Scotland is used to grow crops for malting and biofuel, 38% for production of animal feed, and only 10% to produce food for direct human consumption. From that used to produce animal food, we then export 73% of beef and 83% of lamb. These red meat exports reached a record value of £173million in 2024/25[37]. This export industry is positive from a wider economic perspective, but it does nothing for domestic food security.

- Scotland also imports roughly £2.5 billion worth of agricultural products or finished food and drink products annually from overseas (predominantly fruit and vegetable but also animal feed, fish and seafood), and this is added to by an unknown extent of imports from the rest of the UK.

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[36] Unless otherwise referenced, statistics quoted in this annex are drawn from a paper and presentation, prepared by Scottish Government officials and presented to the 23 September 2023 meeting of the Agriculture Reform Implementation Oversight Board. The paper/slides are not online, but are widely available and provided to SCCS in response to an FoI request; they cite sources such as the regular Agricultural Census, published agricultural data, and RESAS analysis.

[37] https://qmscotland.co.uk/news/new-research-shows-scottish-red-meat-is-more-valuable-than-ever-to-economy-and-consumers

The evidence in this response has sought to demonstrate that change in agriculture is inevitable (partly as a result of climate change, but also due to changing consumer demands and government-led health advice). Thus, if we want agricultural policy to improve food security, then maintaining the *status quo* with an unambitious reform programme should be the last option. Instead, the Scottish Government should seek to reduce the food 'diverted' to biofuels and alcohol, encourage more fruit and vegetable production, and disincentivise consumers from choosing imported goods. It is also crucial to have healthy trading relationships with other major food producers to ensure food supply (and more affordable food) and resilience if and when domestic production falls short of need.