

Response ID ANON-XEE5-9T1F-U

Submitted to Delivering our Vision for Scottish Agriculture. Proposals for a new Agriculture Bill
Submitted on 2022-11-25 12:07:55

1. Future Payment Framework

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

Yes

Please give reasons:

NESAAG's view is that the proposed tiered approach is logical and aligns with CAP.

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

Yes

Please give reasons:

There is an expectation on the part of the farming industry that the continuation of baseline payments will be essential to support land managers delivering specified outputs, including the production of certain types of food and the beneficial management of land - and that these payments will be conditional on meeting certain criteria.

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

Yes

Please give reasons:

NESAAG agrees that enhanced delivery of public benefits, particularly (but not exclusively) those relating to net zero and biodiversity should attract additional support as proposed for Tier 2.

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

Yes

Please give reasons:

Yes. A menu of land and management and business development options offering discretionary support under Tier 3 is a fair approach to incentivising industry to play its part in meeting Scotland's obligations. A wide range of management options will be required to reflect the huge range of land and other natural assets under management for agricultural purposes, mirrored by an equally wide range of management objectives. An elective approach is therefore appropriate.

5 Do you agree that Tier 4 should be complementary support as the proposal outlines above?

Yes

If so what sort of Complementary Support do you think would be best to deliver the Vision? Please give reasons:

Yes - but by bundling in Tier 4 such a wide array of 'complementary support' (investment in human capital, non-farming land use, measurement tools and transformation) the impression could be formed that these issues are of lesser importance. But as primary legislation is the focus of this particular consultation, it may be an administrative convenience to do so. NESAAG would argue that investment in the capabilities of the next generation of land managers is paramount.

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

Yes

Please give reasons:

A good number of progressive farm businesses in NE Scotland (especially those operating in unsupported sectors) already operate a whole farm plan to drive continuous and holistic improvement - and measure their performance regularly against the plan to monitor progress. Adopting this approach more widely would represent a significant step forward in boosting the productivity of the wider agricultural and land-based sector. 'No measurement - no management'.

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

Yes

Please give reasons:

No definition of 'Just Transition' as it applies to agriculture is offered in the consultation document. The presumption (from the JT Fund) is that JT aims to create 'good, green jobs in the transition to net zero, benefits communities and encourages partnership working and capacity building'. These are desirable outcomes consistent with the strategic objectives of the Bill but appear to be covered elsewhere in the consultation already, largely under 'Wider Rural Development'.

8 Do you agree that the new Agriculture Bill should include mechanisms to enable the payment framework to be adaptable and flexible over time depending on emerging best practice, improvements in technology and scientific evidence on climate impacts?

Yes

Please give reasons:

Future flexibility is absolutely required. Much of the scientific evidence being brought to bear to measure Scottish agriculture's emissions performance is ill-fitting and requires refinement and contextualisation.

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

Yes

Please give reasons:

Crisis-related intervention and support has in the past been far from universally available for the agricultural and horticultural industry. Not only should the Bill make such a provision - it seems only fair that sectors which are excluded from direct and ongoing subsidy (eg pigmeat, fruit and veg) should at the very least be eligible for assistance in the event of a major calamity (such as an outbreak of African Swine Fever in the former and catastrophic weather events in the latter).

2. Delivery of Key Outcomes: Climate Change Adaptation and Mitigation

1 Do you agree with the proposal set out above, in relation to the new Agriculture Bill including measures to allow future payments to support climate change mitigation objectives?

Yes

Do you have any views on specific powers and/or mechanisms that could support such alignment? Please give reasons:

Given the urgency associated with climate change, and the role that the wider land-based sector can play in mitigation, it is essential that relevant provision is made in the Bill for appropriate measures.

In exchange for future payments from the public purse, agriculture should deliver – and be seen to deliver – tangible and measurable mitigation benefits.

2 Do you agree with the proposal set out above, in relation to the new Agriculture Bill including measures to allow future payments to support climate change adaptation objectives?

Yes

Do you have any views on specific powers and/or mechanisms that could support such alignment? please give reasons:

Climate change is likely to bring some benefits for the sector – but also some challenges. The new Bill should therefore include provision for climate change adaptation payments - eg to enhance resilience to water shortage (efficiency/storage/monitoring measures).

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

Yes

Please give reasons:

NESAAG agrees in principle that some subsidy payments should be conditional on the delivery of specified outcomes, particularly on climate mitigation, and where relevant, on adaptation, alongside a range of elective measures. Early sight of the conditionality thresholds for such payments would be welcome.

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

Yes

Please give reasons:

The activities outlined above (peatland, woodland, ILM) will play a major part in meeting the land-based sector's net zero and biodiversity targets and are unequivocally supported by NESAAAG. They will also deliver wider environmental benefits and should strengthen the fabric of the rural economy. Tree planting should be targeted at optimal locations to minimise the loss of prime agricultural land and of selected natural habitat such as species rich grasslands. Integrated land management has been practised by farms and private estates in NE Scotland for many years - it is recognised as one of the most mixed farming/land use regions in Scotland, in which the close proximity of arable, grassland, intensive livestock, horticulture, shelterbelts and forestry is highly complementary and helps build resilience, especially useful in times of change.

2.1 Nature Protection and Restoration

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

Yes

Please give reasons:

NESAAG welcomes the ambition to encourage farming and crofting with nature as an objective alongside sustainable food production. The Bill mentions targeted outcomes and mechanisms to support biodiversity and nature restoration outcomes. Issues relevant to Local Authorities include support for natural flood control measures on farmland and the control of invasive species, for which, experience suggests, incentives are required. Specific nature/environmental measures in secondary legislation will be key in achieving the stated aims. An opportunity to provide future input will be welcome. Tier 1 and Tier 2 payments conditional on standards being met provide an opportunity to deal with invasive species. INNS are a major threat to biodiversity. With no action, the cost of dealing with INNS steadily increases. But they can be managed effectively if everyone within a locality works together. Incentivising action through general agricultural funding would make good economic sense and have a positive impact on the environment.

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

Yes

Please give reasons:

Devising a Bill to regulate and provide for the enormous diversity of Scotland's 'agricultural' area is a huge undertaking. While the focus for many will be on the Bill's implications for activity on better quality land, support and options for those proactively managing extensive areas of upland and island Scotland to deliver natural capital outcomes will be equally important to help meet the sector's stated targets. Further detail on the proposed mechanism would be welcome

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

Yes

Please give reasons:

NESAAG welcomes options for collaborative/catchment scale works. Regional targeting of measures for nature protection and restoration could be more effective. There are hints in the consultation, but more detail is required. How would localised options/targets be identified? How local could this be – a group of farms, within a landscape or at Local Authority level? Will there be some form of regional structure which identifies these targets? Rural Land Use Partnerships?

Priority habitats and species are identified at a regional level by LBAPs based on expert local knowledge - targeted funding should take this information into account.

NESAAG notes there is no mention of natural networks and how the agriculture sector could help to deliver them (Scottish Government is promoting them as a priority (30x30 for nature etc.). Delivery of national biodiversity aspirations can only be achieved if fully aligned with agricultural support. Payments that deliver nature restoration, maintenance and enhancement are proposed in the Bill. Local Authorities are involved in identifying Local Nature Conservation Sites. Of regional importance for biodiversity, some are of high value – comparable to SSSIs. Although LA's identify these sites and can protect them from damaging development, it is difficult to ensure that they maintain their biodiversity interest or are enhanced through appropriate management. Most sites are privately owned and form part of agricultural holdings.

It would be very helpful in securing good management of these sites if agricultural funding could be targeted toward these sites as they have the potential to form the basis of natural networks within the wider countryside.

2.2 High Quality Food Production

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

Yes

Please give reasons:

NESAAG agrees. The creation of primary legislation is a lengthy process and the current opportunity should be fully utilised to ensure the legislative framework provides for all known eventualities, to which future secondary legislation can be attached more readily.

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

Yes

Please give reasons:

NESAAG agrees. As noted in the consultation document, much of the food produced in the UK and consumed in the UK is not currently eligible for direct public support (although capital and marketing grants are available for investments adding value to primary produce such as potatoes, eggs, fruit and veg). Creating scope for future flexibility is appropriate.

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

Yes

Please give reasons:

In principle yes – but further detail is required on how such a mechanism would interact with existing market drivers in the food supply chain which prioritise high quality food. Would a support mechanism lead to a reduction in financial returns from the market, ultimately benefitting food retailers but not food producers?

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

Yes

Please give reasons:

NESAAG agrees. The above text describes the Food Processing, Marketing and Cooperation Grant scheme which has been immensely beneficial for agri-food businesses - and should continue. The critical importance of the processing sector to primary production is keenly appreciated in NE Scotland. Since the closure of the Muller Wiseman dairy in Aberdeen in 2016, the number of local dairy farms has declined by over 70%, mirroring the prior collapse of the local broiler sector. Other primary production sectors are at risk due to the ongoing fragility of local processing businesses.

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

Yes

Please give reasons:

NESAAG agrees. And as set out in the answer to Q9 (above) there is a good case for broadening access to such support, should it be considered necessary by Scottish Ministers.

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

Yes

Please give reasons:

Yes. One recent example of an otherwise highly efficient, productive and market-facing sector experiencing prolonged hardship due to exceptional, external circumstances is the pig industry.

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

Yes

Please give reasons:

Agree. Access to performance data is essential for continuous business improvement – as is access to market demand trends (eg from the Scotland Food and Drink Knowledge Hub).

2.3 Wider Rural Development

1 Do you agree that the proposals outlined above should be included in the new Agriculture Bill?

Yes

Please give reasons:

Agree strongly. There is a case for naming the Bill the Agriculture and Rural Development Bill.

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

Yes

Please give reasons:

There appears to be minimal reference to support for the improvement of public access. This was included in previous schemes and its inclusion is to be encouraged - and ideally, open to a range of public sector bodies, third sector organisations and community bodies as well as land managers.

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

Yes

Please give reasons:

Most of the rural development proposals would appear to be covered by EU retained powers. It is unclear whether additional powers are required - but what is urgently required is the re-establishment of continuity of policy and funding to start to rebuild the capacity of local action groups (eg Leader-related) which has eroded significantly over the past three years. The implementation of past EU legislation (eg food hygiene regs) has had damaging impacts on rural and island communities, notably the loss of small abattoirs. Once lost, they are extremely difficult to reinstate. The powers relating to and support for critical rural and island infrastructure should be reviewed to help sustain dependent communities.

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

Please give reasons:

Insufficient detail to comment at this point.

2.3.1 Animal Health and Welfare

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

Yes

Please give reasons:

Strongly agree - current legislative levers are outdated.

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

Yes

Please give reasons:

This proposal is welcome. Promoting the adoption of higher standards of animal husbandry will enhance the operational and financial performance of livestock businesses and mitigate biosecurity risks. However the animal health and welfare staff resources required to monitor this proposal are currently fully stretched. Plans to create a Scottish Veterinary Service are noted, and the proposals for the SRUC Vet School at Craibstone are warmly welcomed.

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

Yes

Please give reasons:

There will be legitimate questions on the ownership of the data referred to, and potentially some privacy concerns, but in principle, the proposal is sound and will contribute to a deeper understanding of the sector - and enhance its resilience, productivity and progress on emissions reductions.

2.3.2 Plant Genetic Resources and Plant Health

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

Yes

Please give reasons:

Strongly agree - plant genotypes are vital resources. Genetic material from wild, indigenous - and cultivated - plant varieties could hold the key to tackling future outbreaks of pest, disease or other threat and help develop more climate resistant cultivars. Powers should also provide for precision gene editing in plant breeding to fully harness the benefits offered by such genetic material to reduce future use of pesticides and enhance the resistance of crops to drought (eg potatoes)

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

Yes

Please give reasons:

Strongly agree. Every effort should be made to harmonise arrangements in Scotland with the plant health powers of other Devolved Administrations

3. Skills, Knowledge Transfer and Innovation

1 Do you agree that support should continue to be provided in this area?

Yes

Please give reasons:

Strongly agree. In general, the challenge for Scottish agriculture lies not in the devising of solutions to technical and other issues, but to boost uptake across industry. It is essential therefore that efforts to promote knowledge transfer and exchange are stepped up to deliver enhanced technical performance and profitability for individual businesses and to meet sectoral targets for net zero and biodiversity.

2 Is there any particular gaps in delivery that you can identify?

Yes

Please give reasons:

Through the efforts of RHET, RNCI and other organisations, individual farmers and land managers inspire and inform thousands of young people every year, explaining in a structured and professional manner what farming and the land-based sector does, where the nation's food, drink, timber are other products come from and – importantly – stimulating interest in land-based careers. These farmers willingly give of their time. The service they provide is a public benefit and should be recognised as such within the Bill (eg in conditional support).

3 Are there any alternative approaches that might deliver better results?

Yes

Please give reasons:

Farmer to farmer knowledge exchange is generally the most effective approach. But many businesses choose not to engage.

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

Yes

Please give reasons:

Creating new powers to establish minimum standards for animal health and welfare as a condition of receiving payments may encourage higher uptake of advisory services, knowledge transfer and skills development by those in the 'hard to reach' category.

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

Yes

Please give reasons for your answer:

Agree – the land-based sector is likely to face a number of challenges to its ongoing resilience in years to come and powers to establish strategic reserves to counter adverse circumstances would be a logical development. Clear limits will be required on the extent of market distortion justifying intervention – the market for agricultural produce is not in any way 'perfect' in terms of economic theory. And the term 'equitable treatment' may be more appropriate

than 'equal treatment' of farmers

4. Administration, Control, and Transparency of Payment Framework Data

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

Yes

Please give reasons:

Strongly agree – an efficient, reliable, integrated database and administrative system will be required to serve the interests of the land-based sector and taxpayers alike.

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

Yes

Please give reasons:

Strongly agree. The answer above refers

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

Yes

Please give reasons:

Strongly agree. A clear definition of 'public interest' would be helpful

4 Do you agree that Scottish Ministers should have the power to create a system that provides a mechanism that aligns with the principles of the Scottish Public Finance Manual?

Yes

Please give reasons:

Strongly agree.

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

Yes

Please give reasons:

Strongly agree.

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

Yes

Please give reasons:

NESAAG is supportive of an efficient, timeous and proportionate due diligence process to check the validity of applications and claims for support payments to ensure the proper use of public funds.

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

Yes

Please give reasons:

NESAAG agrees that powers to create such a system should be included in the Bill. Further information is required on implementation proposals

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

Yes

Please give reasons:

Agree

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

Yes

Please give reasons:

Agree. Evidence-based assessment of outcomes delivered will be essential to ensuring scarce resources are targeted effectively, now and in the future.

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

Yes

Please give reasons:

Agree that independent verification is desirable.

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

Yes

Please give reasons:

NESAAG supports transparency on the payment of public funds to beneficiaries

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

Yes

Please give reasons:

Agree

5.1 Agreement to Diversification

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

Yes

Please give reasons:

Agree

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

Yes

Please give reasons:

Agree

5.2 Waygo and Schedule 5 of the Agriculture Holdings (Scotland) Act 1991

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

Yes

Please give reasons:

While NESAG is broadly supportive of greater flexibility for the tenanted sector so it can play its part more effectively to meet climate and biodiversity challenges, this is a very complex legal arena. NESAG offers its support only in principle.

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

Don't know

Please give reasons:

This is a very complex legal arena and NESAG offers no response on this point.

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

Please give reasons and alternatives:

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

Yes

Please give reasons:

Agree

5.3 Amendment to Rules of Good Husbandry and Good Estate Management

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

Yes

Please give reasons:

Agree in principle – but further details required

5.4 Rent Reviews

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

Don't know

Please give reasons:

This is a complex legal arena and no response is offered

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

Don't know

Please give reasons:

This is a complex legal arena and no response is offered

5.5 Resumption

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

Don't know

Please give reasons :

This is a complex legal arena and no response is offered

6. Scottish Agriculture Wages (Fair Work)

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

Don't know

Please give reasons:

While NESAG is strongly supportive of fairly-paid agricultural workers – indeed many are already paid above the real Living Wage - the full implications of this proposal would require to be studied in more detail.

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

Don't know

Please give reasons:

The implications of this proposal would vary enormously across the land-based sector. The overall impact is unclear and would require to be studied in more detail before a considered response could be offered.

Assessing the Impact

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

Please give reasons:

While the Fair Work proposals could enhance the attractiveness of jobs in the sector to prospective applicants, they are likely generate additional costs and burdens. Many businesses important to the local economy, particularly in remote and rural Scotland, are financially fragile and there are many reports of farmers and rural business owners paying their staff more than they pay themselves. On the other hand, public funds should not benefit recipients at the expense of a fair return for employees (and contractors).

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

Please give reasons:

The intended direction of travel is intended to be (and needs to be) beneficial for the environment. But it is not possible to offer an overall view on the basis of the information currently provided.

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

Please give reasons :

It is not possible to offer an overall view based on the information currently provided.

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

Please give reasons :

It is not possible to offer an overall view based on the information currently provided

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

Please give reasons :

It is not possible to offer an overall view based on the information currently provided

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

Please give reasons :

It is not possible to offer an overall view based on the information currently provided

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

Please give reasons :

It is not possible to offer an overall view based on the information currently provided. It is hoped that the publication of secondary legislation proposals will offer greater clarity on this and other points.

About you

1 What is your name?

Name:
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2 What is your email address?

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3 Are you responding as an individual or an organisation?

Organisation

4 What is your organisation?

Organisation:
NE Scotland Agriculture Advisory Group

5 What is your occupation?

Public sector

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

Publish response with name

7 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

8 I confirm that I have read the privacy policy and consent to the data I provide being used as set out in the policy.

I consent

Evaluation

1 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?:
Neither satisfied nor dissatisfied

Please enter comments here.:

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

Please enter comments here.: