

CAP REFORM - opportunities

The Scottish Government are running a series of [roadshows](#) around Scotland until the 1st February to discuss the implications of the current Common Agricultural Policy proposals to be implemented from 2014. A useful briefing on these proposals has been produced by [SPICe](#) for MSPs.

Crucial to heritage interests is the move in stages from the current historic payment system to an overall area payment by 2020, starting with a 40% area payment from 2015. In particular, we welcome the proposal under the [Direct Payment Regulation](#) to maintain areas of permanent pasture and a commitment to spend 30% of the direct payments for 'greening'. Additionally there is a commitment for farmers to protect 7% 'ecological focus areas'.

'permanent grassland means land used to grow grasses or other herbaceous forage naturally (self-seeded) or through cultivation (sown) and that has not been included in the crop rotation of the holding for five years or longer; it may include other species suitable for grazing provided that the grasses and other herbaceous forage remain predominant'

We believe that as permanent pasture is often the best management regime for areas of archaeological importance as well as for species diversity, there can be mutual benefits here where farmers are compensated for maintaining these special areas under permanent grassland. While it is right that they should not be paid public subsidies for damaging assets that are defined as nationally or regionally important, it is also right that they should be compensated for protecting and enhancing them for public benefit.

We remain optimistic that the Scottish Government and the EC will adopt a robust definition of these areas so that areas of significant historic environment interest are protected under the new regulations by giving farmers a financial incentive to do so.



Lyne Roman Fort as surviving c5miles west of Peebles. As can be seen the north side of this fort (on the left of this image) has been largely ploughed out and this important scheduled monument would be best maintained as permanent pasture to protect the surviving remains from further plough damage. Image Crown Copyright RCAHMS.



Inchtuthil Legionary Fortress lies beside the Tay between Perth and Blairgowrie and is nearly 2,000 years old. This photograph, taken during dry summer conditions, shows the remains of Roman defences and buildings surviving just below the turf. This site is of international importance being part of an earlier campaign prior to the construction of the Antonine Wall, itself part of the World Heritage Frontiers of the Roman Empire. Image Crown copyright RCAHMS.

CAP REFORM - continued

The new payment regulation proposes that
'Article 32

Farmers shall ensure that at least 7% of their eligible hectares as defined in Article 25(2), excluding areas under permanent grassland, is ecological focus area such as land left fallow, terraces, landscape features, buffer strips and afforested areas as referred to in article 25(2)(b)(ii).'

Nationally important archaeological and historic sites are already protected under Scottish legislation as well as cross compliance conditions for the receipt of current agricultural subsidies (GAEC 15-17) and EIA regulations.

In terms of simplification, Archaeology Scotland would be interested in seeing all farmers supplied under the Basic Payment with environmental mapping of their units for cross compliance, greening, permanent pasture and ecological focus areas. This is partially exemplified under the [Environmental Stewardship Scheme](#) to which over 65% of English farmers are now signed up to, where all entrants are supplied with an *Environmental Information Map* to help compile their [Farm Environment Record Map](#) (e.g. Section 2.1.6).

SEweb

The launch on the 28th November of this new and extremely useful Scottish Environment web portal, <http://www.environment.scotland.gov.uk/>, hosted by SEPA, offers the obvious platform for compiling Environmental Information Maps for farmer recipients of CAP subsidies, as described above. This will require the upgrading of some data sources this but Archaeology Scotland believes this can be achieved by the time of the introduction of the new CAP programme in 2014/2015.

'The aim of this €5 million project is to improve understanding of the Scottish environment and the complex interactions between environmental media,



Members of the North of Scotland Archaeological Society are working with Archaeology Scotland and the active support of the local farmer to promote this prehistoric cairn and an adjoining 18th century farm settlement at Mulchaich on the Black Isle as a local visitor attraction. The latter was part of the Ferintosh Estate of Forbes of Culloden, but whether it formed part of the famous whisky distillery complex (as lauded by Burns among other writers) has yet to be confirmed. As an island of archaeology, in an area unsuitable for cultivation, it has survived as an area of permanent pasture and is therefore additionally of interest as an area of species-rich grassland, increasing its environmental value, but also requiring regular grazing to maintain its historic, environmental and landscape value. It is therefore an ideal spot for receiving continuing protection and payment both as an area of permanent pasture and as an ecological focus area.

pollutants, human impact and long term trends. It will identify and prioritise environmental problems, report the current effect of interventions and promote improved and cost-efficient measures to improve Scotland's environment.'

'Bringing together information on Scotland's environment in one place. There is nowhere else that environmental data and reports from known and trusted sources can be accessed and looked at in combination. The site provides straight-forward descriptions of the state of Scotland's environment and key messages that highlight our progress in protecting it.'