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CAPMovingforward@scotland.gsi.gov.uk

12 December 2013

Dear Mr Scott,

Mini-Consultation on Pillar to Pillar CAP Budget Transfers

Thank you for the opportunity to respond to this mini-consultation.

The Institute for Archaeologists

The Institute for Archaeologists (IfA) is a professional body for the study and care of the historic environment. It promotes best practice in archaeology and provides a self-regulatory quality assurance framework for the sector and those it serves.

IfA has over 3,000 members and more than 70 registered practices across the United Kingdom. Its members work in all branches of the discipline: heritage management, planning advice, excavation, finds and environmental study, buildings recording, underwater and aerial archaeology, museums, conservation, survey, research and development, teaching and liaison with the community, industry and the commercial and financial sectors.

IfA's Scottish Group has over 200 members practising in the public, private and voluntary sector in Scotland. Furthermore, IfA is a member of the Built Environment Forum Scotland (BEFS), a network organisation that brings together non-governmental organisations and professional bodies that work with Scotland's built environment.

Pillar to Pillar CAP Budget Transfers

General

IfA is concerned with Common Agricultural Policy (CAP) insofar as it affects the historic environment. In this regard, notwithstanding the greening and cross compliance provisions of Pillar 1 (which we support), it is the Rural Development Programme and Pillar 2 which have the potential to deliver by far the most significant benefits for the historic environment.

In particular, agri-environment schemes can deliver widespread public benefit (both socially and economically as well as environmentally) through their support for the management and protection of the historic environment (including both designated and undesignated heritage assets and wider historic landscapes). Such schemes have a crucial role to play in supporting the sustainable development of rural areas and in responding to society's increasing demands for environmental services. Indeed, the Institute firmly believes that rewarding farmers for the environmental goods they provide is a much better use of taxpayers' money than providing direct subsidy.

Without a full commitment to the holistic management and protection of the historic environment

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through its Rural Development Programme, Scottish Government risks failing to deliver its policy commitments in the Scottish Historic Environment Policy (SHEP) and elsewhere and failing meaningfully to address its National Performance Indicator *'to improve the state of Scotland's historic sites'*.

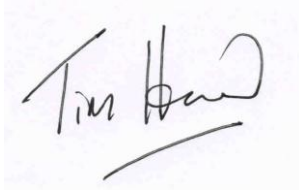
Specific Question

Do you agree with the Scottish Government's proposed use of Pillar-to-Pillar budget transfers under the 2014-2020 Common Agricultural Policy ? Please give reasons for your position.

No. For the reasons outlined above, IfA believes that the maximum 15% should be transferred from Pillar 1 to Pillar 2.

If there is anything further that I can do to assist please do not hesitate to contact me.

Yours sincerely,

A handwritten signature in black ink that reads "Tim Howard". The signature is written in a cursive style with a horizontal line underneath.

Tim Howard LLB, Dip Prof Arch
Policy Advisor