

PE1720/B

NFU Scotland submission of 31 July 2019

- NFU Scotland (NFUS) welcomes the opportunity to submit evidence on this petition, which calls upon the Scottish Parliament to urge the Scottish Government to develop a natural flood alleviation strategy under the Flood Risk Management (Scotland) Act 2009.
- NFUS considers that, as the Flood Risk Management (Scotland) Act 2009 does not specifically put duties on Scottish Ministers to produce a natural flood alleviation strategy, a change in primary legislation may be required.
- NFUS considers that there is already widespread consideration of Natural Flood Management across Scotland and wishes to add the following background to the Committee's deliberation on this topic.

Background

1. NFUS recognises that the Flood Risk Management (Scotland) Act 2009 does not specifically request the Scottish Government to develop a natural flood alleviation strategy, however, it is the view of NFUS that there has been much progress in this area – not least as the Act does require the production of flood risk management plans. Included within these plans there is consideration of possible Natural Flood Management measure and there are just under 100 Natural Flood Management actions identified in Scotland's Local Flood Risk Management Plans.
2. Additional work on Flood Risk Management is as follows:
 - a. SEPA Natural Flood Management Handbook: <https://www.sepa.org.uk/media/163560/sepa-natural-flood-management-handbook1.pdf>.
 - b. The James Hutton Institute has helped establish the Natural Flood Management network: <https://www.nfm.scot/>.
 - c. SRUC have produced an NFM guide for farmers: <https://www.sruc.ac.uk/NaturalFloodMgmt>.
 - d. The Tweed Forum has been leading the way in trialling NFM measures in the Eddleston Water <https://tweedforum.org/our-work/projects/the-eddleston-water-project/>.
 - e. Section 20 of the Flood Risk Management Act put a duty on SEPA to assess the possible contribution of natural flood management to manage flood risks. As a result of this requirement, SEPA has produced Natural Flood Management opportunity maps: https://www.sepa.org.uk/media/163412/natural_flood_management_guidance.pdf.
3. In light of the above evidence, NFUS would dispute the basic assertion in the Petition that suggests that there has not been much consideration given to Natural Flood Management.

NFU Scotland position

4. NFUS believes that there is scope to do more Natural Flood Management work in catchments, and farmers can play a role in this. However, the critical issue relates to how those practical interventions are promoted and incentivised. In terms of policy tools, Scottish Government currently has schemes such as the Scottish Rural Development Programme and Forestry Grants Scheme which could do more to support such activity in a coherent way.

5. However, NFUS strongly considers that intermediary organisations play a much more constructive and positive role in encouraging an increased uptake in Natural Flood Management measures. This is where the work of intermediary organisations such as the Tweed Forum have real value. Tweed Forum staff work with farmers to identify opportunities for Natural Flood Management measures that can benefit both the farm business and the environment, without the use of regulation.
6. A key element of the Petition is the reference to the beaver as a means of delivering Natural Flood Management. It is true that beavers modify the environment in ways similar to other Natural Flood Management measures, however, NFUS strongly contends that they cannot be relied upon as a Natural Flood Management tool because while they may provide positive ecosystem services in some cases they can also cause significant problems.
7. In Tayside, the beaver population has risen exponentially following an illegal release and the Scottish Government itself has said that it would not have chosen this catchment a site for release. In the Tayside area beavers cause significant problems to farmers and landowners in the area by blocking ditches which raises the water table and stops field drains from working, which in turn reduces the productivity of the land. Beavers also burrow into banks which then collapse, and farmers gradually end up losing productive land. In other places, beaver damming of watercourses is giving rise to concerns about possible flood risk to homes and nearby settlements.
8. Consequently, it cannot be assumed that beavers are Natural Flood Management tool because their behaviours cannot be determined and, as has been proven in the Tayside catchment, in many cases beavers have built dams in places that might not be appropriate. Indeed, Scottish Government has already confirmed that it will not start translocating beavers into new areas, but will allow the natural spread of the species.
9. **To conclude these remarks, NFUS contends that it can support work on Natural Flood Management and that farmers can play a constructive role in that agenda. However, NFUS cannot support the petition with its emphasis on using beavers as the tool to deliver Natural Flood Management. Rather than seek to force Scottish Government to produce a natural flood alleviation strategy, it would be much more useful and beneficial for flood mitigation and wildlife if the government were to seek to establish other intermediary organisations like the Tweed Forum in other parts of the country to facilitate uptake of Natural Flood Management measures.**