

Written evidence from the National Farmers Union Scotland (NFUS) (MET0027)

NFU Scotland (NFUS) is the leading agricultural organisation in Scotland. Representing more than 9,000 farmers, growers, and crofters, our members provide and support thousands of jobs and deliver significant economic, social and environmental benefits across Scotland. Agriculture is the lynchpin of rural Scotland and is an important part of the Scotland's booming food and drink industry. Scottish agriculture generates a gross output of £3.3 billion annually. The farming and crofting sector is committed to sustainable food production, enhancing biodiversity and helping to tackle climate change.

Executive Summary

- In Scotland, agriculture is responsible for 20% of national GHG (Greenhouse Gas) emissions, methane from enteric fermentation and slurry management accounts for over 60% of this. To date, there has been a reduction of 14% in emissions because of dropping livestock numbers, but also a rise in efficiency. However, we also need support for Scottish livestock production to reduce the risk of Scotland exporting our food production and methane emissions around the world and putting our domestic food security at risk.
- Methane is a short-lived climate pollutant in contrast to longer-lived greenhouse gases like CO₂ and nitrous oxide. Agriculture has a significant role in contributing to GHG removals, but the choice of emission metric affects the quantification GHG emissions.
- Methane suppressing feed products (MSFP) have been discussed at length with our membership and while we recognise they are a tool to have in the tool box, it's important that they are not viewed as a silver bullet. We strongly advise against a mandated approach to MSFP. We have concerns related to the cost, practicality, food safety and supply chain infrastructure. We can supply further information on these concerns if necessary.
- It is critical that both governments consider the opportunity and importance of on-farm productivity improvements. We are clear that potential exists through productivity improvements to reduce absolute emissions of all GHGs and emissions intensity.

- We underline the need for ongoing improvement of GHG accounting at both farm, industry and inventory level. It is important that tools are development to demonstrate progress made by the industry thus far and to highlight any gaps in implementation. This requires support for industry initiatives which aim to reduce duplication and drive the provision of reliable, streamlined data, such as the work on going by Dairy UK which sets ambitious targets for environmental improvement for both farmers and processors. We are working with Scottish Government to encourage them to deliver support for such industry initiatives. Furthermore, we would also like to see collaborative working on the next steps in harmonising carbon accounting tools for agriculture across the UK.
- We reiterate our previous asks for the Treasury to commit to an increased, ring-fenced and multi-annual agriculture and rural development budget for the UK from 2025-2029. Furthermore, we ask that there is an increase in the next UK Government's funding commitment by at least an additional £1 billion, given the costs to deliver the required public interest and public good outcomes. This must as be complimented by a review the allocation of total funding across the UK to better reflect that Scotland punches above its weight in delivering for food, climate and biodiversity.

Data, measurement and monitoring

8) What is the status of methane accounting, monitoring and reporting in the UK at present and how does it compare internationally? Is UK accounting and reporting considered to be accurate and robust? What improvements, if any, are possible and what benefits would these deliver?

- We welcome the UK Government's commitment under the Global Methane Pledge to move towards using the highest tier IPCC good practice inventory methodologies. Continual improvement of the national GHG inventory, both through more representative emissions factors and activity data, is critical to demonstrate progress made by the industry and to highlight any gaps in implementation.

- Improved emissions factors must also be made available to on-farm GHG calculators so that farmers can better track their own progress. The standardisation of metrics to help establish a sector-wide GHG footprint is being considered which can be used to demonstrate progress. Devolved governments must work collaboratively while also supporting industry initiatives which aim to reduce duplication and drive the provision of reliable, streamlined data.

11) What are the advantages and disadvantages of available metrics used to report and compare methane emissions including GWP100 and GWP*?

- We understand that no single metric can accurately compare all consequences of different emissions, and all have limitations and uncertainties. Using GWP100 overstates the temperature impacts from a constant CH₄ emission by a factor of 3–4 over a 20-year time horizon and conversely understates the impact of a new emission by a factor of 4–5 over the 20 years after it started.¹ It has also been suggested that GWP* is more useful for reporting aggregate emissions across sectors and to map global trends and targets, with GWP100 better used for benchmarking at farm level, as 20 years of data are needed for GWP* and not always available.
- Due to the advantages and disadvantages of both metrics, we want to see a unified approach with industry and government at a national scale and so supports dual accounting using GWP100 and GWP*. We encourage the continued exploration of robustly incorporating GWP* for dual reporting in on-farm calculators. The nutrient density of foods in relation to their climate impact also needs to be expressed.
- In 2021, the IPCC report did not recommend the use of any specific emission metric as the most appropriate metric depends on the policy goal and context. We are keen to continue to engage with Defra and Scottish Government on how methane and other GHG reductions are recorded, incentivised and valued.

¹ [Methane and the Paris Agreement temperature goals](#)

Agriculture

16) Are there emerging technologies, such as methane suppressant feed products or approaches to slurry management, that could aid with methane emissions reduction in agriculture? What impact could they deliver?

- Over the last two years we have consulted our wider membership twice on MSFPs. Firstly in 2022 as part of DEFRA's review, 81% of respondents did not use or intend to trial MSFP at that time. In our most recent survey, approximately 94% don't use MSFP. As there is currently no impact on the productivity and profitability of individual animals, the primary producer cannot foot the bill of MSFPs. We must also continue to invest and research other methane mitigation measures which can bolster on farm efficiencies. It is important that farmers and crofters are recognised, supported and rewarded for the progress they have made thus far.
- Governments must continue to consider how it can support the industry to improve on the other measures linked to productivity. This includes continuing engagement with industry stakeholders such as Dairy UK/AHDB's Roadmap² and QMS's Net Zero Steering Group.

17) How effective are existing policies and incentives, such as Slurry Infrastructure Grants, in driving methane reduction?

- In Scotland, support under the Agri-Environmental Climate Scheme (AECS) is aimed at providing a mechanism for farmers to invest in new storage capacity this will bring them up to 6 months capacity. This option is not available in areas that are designated as NVZ areas, and this will be the last opportunity for Scottish farmers to apply for slurry storage before 2026.
- Improving slurry management is only one of a range of options available to farmers to reduce greenhouse gas emissions. Other routes include improving feed efficiency, reducing replacement rates by improving health and fertility, using genetic selection to identify lower emitting animals, installation of Anaerobic Digestion Plants, and slurry spreading and application improvements.

² <https://www.dairyuk.org/the-dairy-roadmap/>

- We continue to underline to the Scottish Government the importance of grants in assisting the agricultural sector in reducing methane emissions. We would like to see the inclusion of items such as slurry separators which reduces air and water pollution. The benefits of separating slurry can contribute towards reducing a farm's carbon footprint. The reduction in GHG emissions through the use of a screw press separator is around 30%.

18) What other policy tools, frameworks or incentives could be employed in agriculture to drive methane reduction?

- In Scotland, one of the biggest impediments is investment and restructuring in the dairy sector are local planning rules. We continue to ask the Scottish Government to have flexibility when it comes to planning so that farming can reach its full potential regarding methane reduction.
- Overall, we strongly advise against over regulating the sector to drive methane reduction. This would alienate farmers and inevitably produce perverse outcomes, instead we would like to see environmental regulators and governments work with the industry to promote best practice.

20) How can efforts to reduce methane reduction be balanced against other important considerations in the agricultural sector, including food security?

- While these are reserved matters, we would like to provide some insight from a devolved perspective. Efforts to reduce methane must be balanced with the role of grazing in contributing to biodiversity enhancement, carbon sequestration and socioeconomic support. For example, Scotland's Red Meat Sector creates £839 million in GVA alone, on farm activity contributes 60% of this.³ It is crucial that any policy development considers these factors to avoid any unintended consequences and protect our food security.

³ Red Meat Economic Report, QMS, 2023. https://s3.eu-west-2.amazonaws.com/quality-meat-scotland/documents/Publications/QMS_Red_Meat_Economics_Report_Landscape_A4_2023_s10.pdf

- Overall, we would like to see additional support for the wider agricultural industry to remove emissions, but we must underline that the primary producer should not be expected to burden the cost of emissions mitigation measures. As previously referenced, there is significant work that can be done on farm to increase productivity and in turn reduce emissions. Policy should focus on support for farmers and crofters to improve breeding, feeding and performance. This extends to support for animal health and welfare initiatives, which will also encourage management changes to improve on farm practises. There needs to be a suite of options for the variety of systems across the UK.