

BVA response to The Rural Affairs and Islands Committee call for evidence the draft Rural Support (Improvement) (Miscellaneous Amendment) (Scotland) (No. 2) Regulations 2025

14 November 2025

Introduction

1. The British Veterinary Association (BVA) is the national representative body for the veterinary profession in the United Kingdom. With more than 19,000 members, our primary aim is to represent, support and champion the interests of the United Kingdom's veterinary profession. We therefore take a keen interest in all issues affecting the profession, including animal health and welfare, public health, regulatory issues and employment matters.
2. With around 2500 members our Scottish Branch champions the veterinary profession in Scotland. Our Scottish Branch provides the consensus view of members in Scotland to shape BVA policy development and advise BVA working groups on pertinent Scotland-specific issues. We also work closely with key stakeholders in Scotland to safeguard animal health and welfare.
3. We welcomed the opportunity to contribute to Rural Affairs and Islands Committee call for views on the Rural Support (Improvement) (Miscellaneous Amendment) (Scotland) (No. 2) Regulations 2025.

Q1) Are these changes to Ecological Focus Areas (EFA) and the Scottish Suckler Beef Support (SSBS) Scheme what you had expected to see in these regulations?

4. Regarding the SSBS Scheme, we welcome the derogation for smaller businesses (ie ten or fewer calves per year). We recognise the value of the CI as a performance metric and generally agree with the need to reduce the CI across the suckler beef sector.
5. We note the current SSBS calving interval is 410 days or less, whilst this is achievable it is quite a blunt instrument, however for certain breeds such as Highland or Galloway grazed on poor land, this target may present a challenge and have associated welfare harms or increases in culling.
6. We also note that the average croft size is around 5 hectares and are concerned that some number of the larger than average crofts, that will nevertheless be small businesses in Less Favoured Areas, may not qualify for the derogation and will need to comply with Calving Interval (CI) conditionality.
7. We are concerned that the absence of a derogation for those with higher numbers of cows could impact negatively on larger but still economically challenged crofts financially; it is important that the Scottish government continues to monitor the effects of not extending the derogation to this group of farmers to ensure that there are no unforeseen implications such as their going out of business which will in turn impact the rural communities and specifically their vet practice who are already under pressure in remote and rural areas.
8. Cattle farming crofters irrespective of size will be the biggest group impacted by these changes. They must be sufficiently supported in implementing the regulations given their small size and limited staff resource, multiple enterprises and their need to manage other environmental requirements such as managing machair, corncrakes and choughs. Additionally, crofters should be encouraged to make use of veterinary services to deal with the undoubted fertility and nutritional challenges of cattle farming in the Highlands and Islands and so help meet the fertility targets necessary for payment of the subsidy.

Q2) Do the new Ecological Focus Areas requirements significantly enhance the current greening requirements?

Not within our remit to comment.