

Please reply to: Clem Sandison
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Mairi Gougeon MSP

Cabinet Secretary for Rural Affairs and Islands

St Andrew's House

Regent Road

Edinburgh

EH1 3DG

27 September 2022

Dear Cabinet Secretary,

I am writing to you on behalf of a group of small-scale poultry farmers from across Scotland, working together to share skills and knowledge for a just transition to agroecology. Our group is facilitated by the Landworkers' Alliance, a union for farmers, growers and landworkers, and is funded by the Scottish Government's Knowledge Transfer and Innovation Fund.

In particular, our group has been focusing on poultry feed, as sourcing affordable, local and organic feed is a serious challenge for us all. We are particularly concerned about how to move away from dependence on imported soya protein. Soya has an extremely high carbon footprint due to both deforestation and long-distance transport, it does not provide an ideal protein source for chickens, and supplementation with other substances such as B12 is also required. Crucially for consumers, soya in poultry feed can pass through to consumers who may be allergic or intolerant. In addition to the environmental benefits, the use of local protein sources instead of imported soya would shorten supply chains and improve the resilience of our businesses, while creating opportunities for innovative and small-scale feed producers.

Black Soldier Fly larvae, which can be raised sustainably on vegetable waste and are a natural food of chickens, would provide a perfect alternative to imported soya in poultry feed. However, under current legislation, these insects must be fed alive to chickens. Small-scale producers such as ourselves do not have the capacity to farm insect larvae ourselves. Purchasing live insects is prohibitively expensive, and many of us are based in remote areas of the country where live poultry feed could not be delivered.

You may be aware that last year the EU amended Regulation EC 999/2001 (TSE Regulations) to allow insect PAP (processed animal protein) to be fed to both porcine and avian species. As the UK had already left the EU when this amendment was made, it does not apply in Scotland.

We are writing to you to ask that a similar amendment be made to Scottish TSE legislation to allow dried insects to be fed to poultry. Due to rising costs and recent changes to the supply chain, this amendment is urgently needed to allow us to continue with our businesses in a sustainable manner and would greatly improve the resilience of the poultry sector in Scotland as a whole.

We would be grateful if you could raise this issue with relevant departments of government and push for an amendment to be made to the TSE legislation as soon as possible. We would also greatly appreciate some clarity on the process and timescale for such an amendment to be made, and who else we should contact about this matter. We would be very happy to host a farm visit or organise an online meeting to discuss the matter further with yourself or colleagues.

Thank you for your time, and we look forward to hearing from you.

Kind regards

Lynn Cassells and Sandra Baer, Lynbreck Croft, Grantown-on-Spey

Lorna Walker, Knockfarrel Produce, Dingwall

Colin & Jill Russell, Ramstane Farm, North Ayrshire

Jennifer & Andy Macdonald, Woodside Arran, Isle of Arran

Marit & Tom Behner-Coady, Invergarry, Highlands

Roger and Gilly Dixon-Spain, The Sailean Project, Isle of Lismore

Finn Barlow, Suie Fields, Dumfries & Galloway

Ruth Ashton-Shaw, Low Auldgirth, Dumfries & Galloway

Alasdair Dickson, Willow Farm, Mid Lothian

Clem Sandison, The Landworkers' Alliance (group facilitator)