

Alternative Land Tenure Models

International Case Studies and Lessons for Scotland

Land-Related Pressures

Countries like Scotland face a variety of land-related pressures.

high land prices

increasing land concentration

the difficulty of land access for new entrants and/or smaller farmers

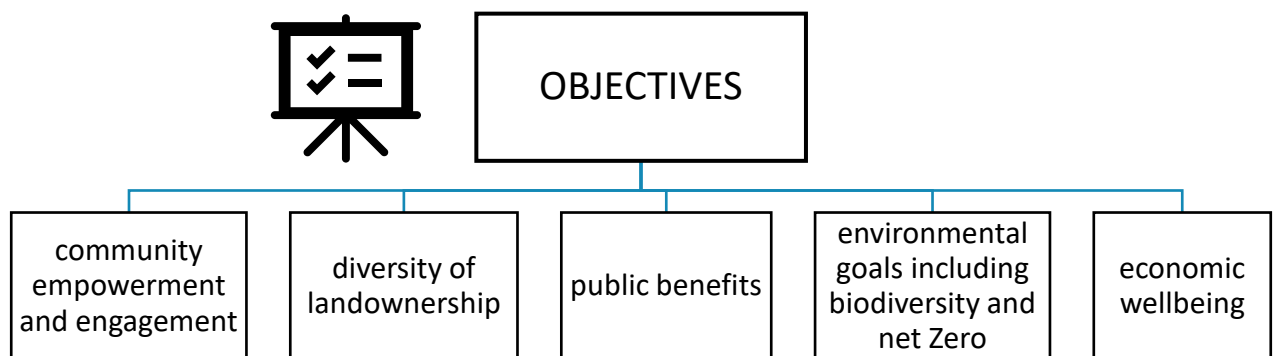
shrinking rural communities

ecological damage

abandoned land

Scotland's Land Reform Objectives

Scottish Government and land sector stakeholder publications have identified common objectives for land reform in Scotland.



This research explores international **models of ownership and control of land** that are different from those predominant in Scotland, and what analysis of them might contribute to **achieving land reform outcomes** in Scotland.

How have organisations, communities, and governments responded?

Alternative land tenure models have been created in response to many of the land-pressures common to countries in the Global North:



Cooperative

Owned and controlled by members



Land Trust

Private not-for-profit organisation



Foundation

Memberless not-for-profit/charitable trust



Municipal Ownership

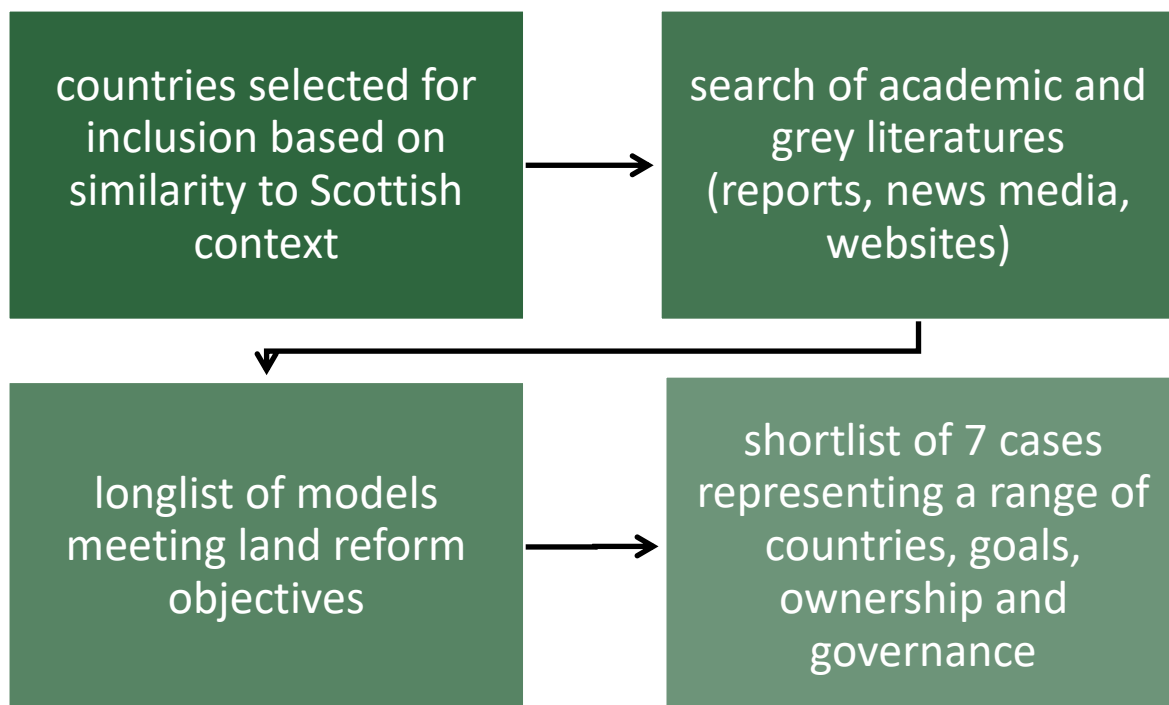
Public ownership by e.g., city, county

What is land tenure?

Land tenure is “the terms and conditions on which land is held, used and transacted, within a particular system of rights and institutions that govern access to and use of land” (Reale and Handmer, 2011)

How was the report created?

Desk-based review



Case Studies of Alternative Models

These models represent a range of countries, goals, ownership and governance, and length of time they have been operating. Collectively, they address concerns about inclusivity and equity, environmental sustainability, local food systems, and rural development.

Kulturland, Germany

Cooperative, established in 2013, 1435 shareholders, 33 tenants, 580 hectares¹

Vision: agricultural land preservation for biodiversity, soil fertility, cultural landscapes, and livelihoods

Operation & governance: Cooperative Shareholders fund land purchases for organic farmers seeking land

Challenges: difficulty attracting shareholders, managing buildings, finding land

Benefits: environmental protection, local produce, activities to integrate farm and community, land for new entrants



Photograph courtesy of Kulturland

Agrarian Trust, United States

Land trust, established 2020, 2531 donors, 8 farms, 168 hectares

Vision: land access for new generation of farmers, land as commons, racial equity, food security and sovereignty

Operation & governance: donations and crowdfunding to purchase land for subsidiaries in local communities with representative governance boards to lease to farmers; scalable

Challenges: rising land prices, legacy of unequal ownership

Benefits: new BIPOC entrants to agriculture, ecosystem conservation, local food



Little Jubba Central Maine Agrarian Commons.
Photograph by Kelsey Kobik

¹ The hectare is an area equal to a square with 100-metre sides or 10,000 m, and is primarily used in the measurement of land. There are 100 hectares in one square kilometre.

Herenboeren, Netherlands

Foundation & cooperative,
established in 2014,
approximately 1600 members,
10 farms, 200 hectares

Vision: Ethical and
environmentally sustainable local
food chain

Operation & Governance:
Provides a structure for
consumers to cooperatively
purchase a farm that supplies
them with produce from a
farmer paid by the foundation.
A scalable model; 200
households per farm, costs paid
by members.

Challenges: reliance on
motivated consumers, volunteers

Benefits: community-building,
biodiversity protection, some
new entrants to farming

Terre de Liens, France

Land trust, private company, not-for-profit
organisations, established in 2003, 18500
shareholders, 300 farms, 8000 hectares

Vision: preserve land for agriculture, support
access for farmers, promote solidarity in rural
and urban areas

Operation & governance: shares and donations
purchase land that is leased to farmers with
legally binding environmental clauses.

Challenges: ownership of buildings is capital-
intensive, legal regulations on shareholders
change

Benefits: local produce and employment,
support for new farmers, policy advocacy



Terre de Liens. Photograph by Adam Calo



A Herenboeren farm. Photograph by Mark van Stokkom

Sale della Terra, Italy

Municipal ownership, established in 2016, approximately 250 workers, 32 municipalities

Vision: social cohesion, multifunctional and inclusive agriculture, rural repopulation

Operation & governance: a consortium of cooperatives that provide social services, including some who reclaim abandoned land for farming. They provide training and support for entrepreneurship.

Challenges: low membership, distance between cooperatives, communication among stakeholders

Benefits: rural development, employment, social inclusion, repopulation



@Sale della Terra. Photograph by Gianpaolo De Siena



"Las Montañas", San Cristóbal de la Laguna, Tenerife. Courtesy of Red Terrae

Red Terrae, Spain

Municipal ownership, established in 2010, almost 50 municipalities

Vision: use abandoned land to promote agroecology and its environmental benefits, employment

Operation & governance: network of municipalities facilitates transfer/lease of abandoned land through land bank and land matching service, provides training in agroecology

Challenges: farmland plots small, scalability may be limited

Benefits: environmental, self-employment, rural repopulation

Grondbeheer, Netherlands

Foundation, established in 1978, 30 tenants, 605 hectares

Vision: increase amount of land under biodynamic agriculture for health food and environment

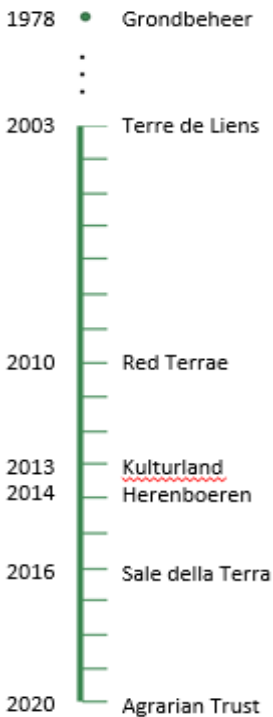
Operation & governance: foundation and charity that purchases farmland through donations and sale of bonds and leases it to biodynamic farmers on long-term contracts

Challenges: sustainable lease clauses not possible, lack of farm pension models

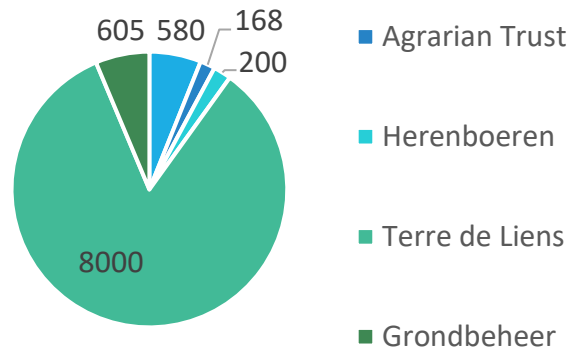
Benefits: environmental benefits from farming practices

Comparison of Land Tenure Models

Date Established



Area of Land Owned (hectares)



Farmland in Germany:

16,700,000 hectares

Farmland in German land cooperatives:

2,900 hectares (0.00018% of total)

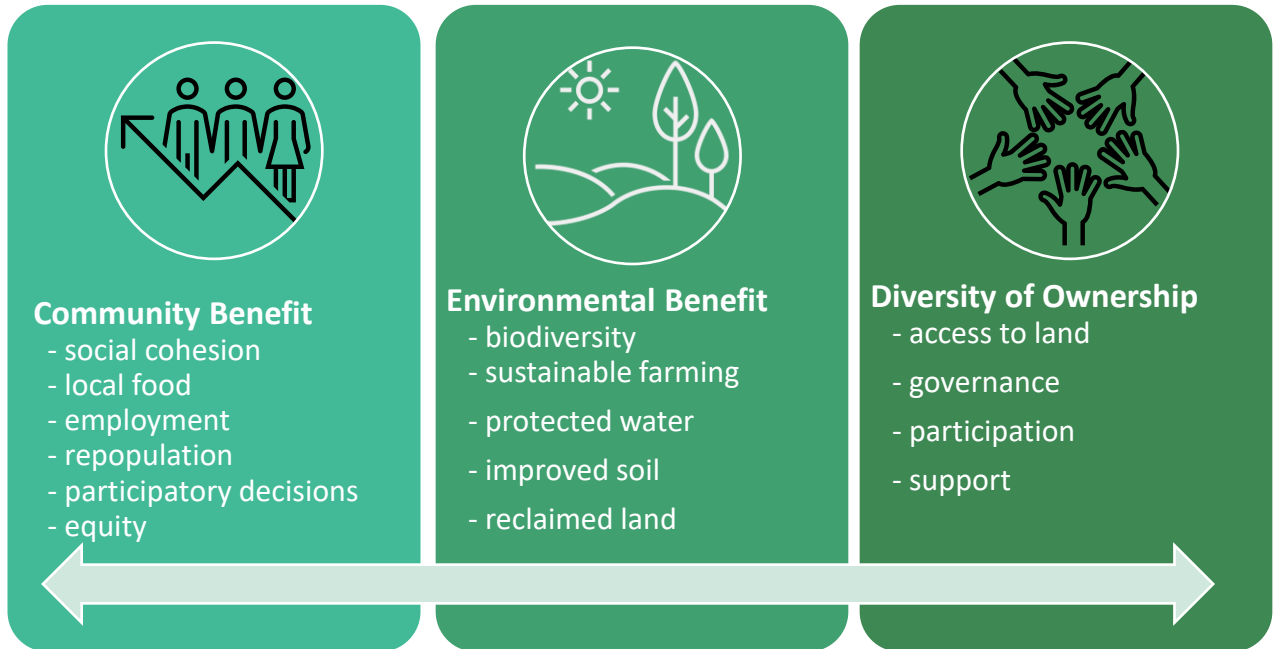
(Kumnig and Rosol, 2021)²

“the alarming rate of land concentration and loss of the small and medium-sized farms will not be solved through land purchases alone, not least because of limitations of scale” (Kumnig and Rosol, 2021, p. 39).

² Kumnig, S. and Rosol, M. (2021) ‘Commoning land access: collective purchase and squatting of agricultural lands in Germany and Austria’, in A. Exner, S. Kumnig, and S. Hochleithner (eds) Capitalism and the commons: just commons in the era of multiple crises. Abingdon, Oxon ; New York, NY: Routledge (Routledge studies in global land and resource grabbing), pp. 25–49.

What did the report find?

How do alternative models meet land reform objectives?



All of the models diversify ownership beyond the typical public and individual private ownership and control. Some provide use rights to a diverse set of users (e.g. migrants; Black, Indigenous, or people of colour; disabled people), a form of land tenure rather than land ownership diversity.

What contributes to the model's success?



What does the report recommend?

The alternative land tenure models in this report should be considered for their suitability in addressing objectives the predominant land tenure models in Scotland may not currently be fulfilling, such as diversification of land users. More government-level support – policy, funding, other – may play a role. Scrutiny of structural barriers to implementation is needed and consideration of possible supports of the ‘soft’ factors enabling success such as human capital.

The report will inform the next stage of research in the Scottish Government's Strategic Research Programme Land Reform Futures project to help further assess measures proposed to reduce scale and concentration of ownership.