

Dyddiad: 30 Hydref 02
Lleoedd Ystafell Bwyllgora 1, Adeilad y Cynulliad Cenedlaethol
Teitl Y Cynllun Tir Mynydd 2004 a 2005

Pwrpas

1. Hysbysu'r Pwyllgor am yr ymatebion a ddaeth i law i'r ymgynghoriad a oedd yn gofyn am safbwyntiau mewn perthynas â gweithredu'r Cynllun Tir Mynydd o 2004 ymlaen. Derbyniodd y Pwyllgor wybodaeth am yr ymgynghoriad yn Adroddiad y Gweinidog ar gyfer y cyfarfod a gynhaliwyd ar 3 Gorffennaf.
2. Mae copi o'r papur ymgynghori a ddosbarthwyd ar 5 Awst i ryw 300 o sefydliadau ac unigolion yn **Atodiad 1**. Cewch grynodedb o'r 22 o ymatebion a ddaeth i law yn **Atodiad 2**. Daeth y cyfnod ymgynghori i ben ar 30 Medi.

Y Cefndir

3. Yr oedd yr ymgynghoriad yn cyflawni ymrwymiad a nodwyd yn Ffermio i'r Dyfodol i adolygu'r ffordd y bydd y cynllun Tir Mynydd yn cael ei weithredu o 2004 ymlaen. Fel yr eglurwyd yn y papur ymgynghori, gwnaeth swyddogion y Cynulliad gydwethio'n agos gyda'r rhai ym maes diwydiant neu'r amgylchedd oedd â budd yn hyn o beth dros gyfnod o fisoedd er mwyn datblygu cynigion ar gyfer adolygu'r cynllun. Mae angen i'r Comisiwn Ewropeaidd gymeradwyo unrhyw newidiadau mewn perthynas â gweithredu Tir Mynydd.
4. Yr oedd y gwaith o baratoi'r papur ymgynghori ar Tir Mynydd yn agos at ei derfyn pan gyhoeddodd y Comisiwn Ewropeaidd ei gynigion ar gyfer yr Adolygiad Canol Tymor o'r PAC nôl ym mis Gorffennaf. Mae'r Comisiwn yn rhagweld y caiff argymhellion yr Adolygiad Canol Tymor eu rhoi ar waith yn 2004.
5. O ystyried cynigion y Comisiwn, a'r ansicrwydd mewn perthynas â'r penderfyniadau ar y broses sy'n gysylltiedig â'r Adolygiad Canol Tymor, penderfynwyd, yn y papur ymgynghori, mai'r opsiwn gorau fyddai cadw'r cynllun presennol (ar wahân i roi terfyn ar y rhwyd ddiogelwch) yn 2004; a gofyn am sylwadau ar gyflwyno newidiadau o 2005 ymlaen.
6. Yn fyr, ar gyfer 2005 gofynnodd yr ymgynghoriad am safbwyntiau ar gyfraddau stocio

isaf ac uchaf; cyfraddau talu yr hectar a bandiau maint a haenau talu diwygiedig; meini prawf o ran isafswm ac uchafswm tir; a'r mathau o ychwanegiadau.

Ymateb y Diwydiant i Gynigion yr Ymgynghoriad

7. Mae'r ymatebion yn dangos cefnogaeth aruthrol i'r opsiwn a ffefrir, sef cadw'r cynllun presennol yn 2004 (heb y rhwyd ddiogelwch). Mae yna gydnabyddiaeth eang ymhlith diwydiant a chyrff amgylcheddol bod angen y sefydlogrwydd y cynllun Tir Mynydd cyfarwydd ar ffermwyr os caiff yr Adolygiad Canol Tymor ei gyflwyno yn 2004. O safbwynt mecanwaith y rhwyd ddiogelwch, mae'r Comisiwn wedi nodi'n gwbl glir na fydd modd cadw'r system ar ôl i'r trefniadau presennol ddod i ben yn 2003.

8. Nid yw'r ymatebion mewn perthynas â'r opsiynau ar gyfer newid yn 2005 mor bendant. O ystyried yr ystod eang o safbwyntiau a gyflwynwyd, mae ymateb cychwynol Llywodraeth Cynulliad Cymru fel a ganlyn:

Cyfraddau Stocio :

- gosod cyfradd stocio isaf o 0.15 lu/ha yn hytrach na'r 0.3 a awgrymwyd yn y papur;
- peidio â phennu cyfradd stocio uchaf o 1.8lu/ha, ond yn hytrach cadw at y trefniadau presennol (sef cynnal archwiliad os yw'r gyfradd yn 1.8lu/ha a bod angen cytundeb rheoli petai gorbori yn dod i'r amlwg);
- peidio â phennu cyfradd stocio lai o 1.2lu/ha ar gyfer y taliad Ardal Llai Ffafirol Difrifol.

Bydd rhaid ail ystyried y materion hyn yn sgil y penderfyniadau a ddisgwylir yng Ngwanwyn 2003 ar y cynigion yn yr Adolygiad Canol Tymor o'r PAC.

Taliadau fesul Hectar (haenau, bandiau, meini prawf ar gyfer isafswm ac uchafswm yr arwynebedd porthiant etc)

9. Bydd Llywodraeth Cynulliad Cymru, gan gydweithio â'r rheini ym maes diwydiant a'r amgylchedd sydd â budd yn hyn o beth, yn ymgynghori ymhellach yn ystod haf y flwyddyn nesaf ynghylch y newidiadau sydd i'w cyflwyno i'r cynllun Tir Mynydd o 2005 ymlaen.

10. O ganlyniad i'r diffyg consensws mewn perthynas â chyflwyno'r terfyn 800 hectar ar daliadau, ac o ystyried yr ychydig ddaliadau yr effeithiwyd arnynt, nid yw'n fwriad gan Lywodraeth Cynulliad Cymru fwrw ymlaen â'r cynnig hwn. Er mwyn anelu arian at y rhai hynny sydd yn ceisio gwneud bywoliaeth drwy ffermio, mae'r cynnig i gynyddu isafswm y tir pori cymwys o chwech i ddeg hectar yn parhau i gael ei ystyried. Gofynnir i aelodau'r Pwyllgor gyflwyno sylwadau.

Ychwanegiadau

11. Cydnabyddodd y rhan fwyaf o'r rhai yr ymgynghorwyd â hwy bod gofyn i'r Cynllun Tir Mynydd yn y dyfodol roi ystyriaeth i'r bwriad i gyflwyno cynllun amaeth-amgylcheddol 'eang a bas' yng Nghymru. Byddai gofyn iddo hefyd fodloni'r elfennau ym mhecyn yr Adolygiad Canol Tymor ynghylch traws-gydymffurfio ac archwilio ffermydd. Felly, bydd y cwestiynau am yr ystod a'r mathau o ychwanegiadau hefyd yn cael eu cynnwys yn yr ymgynghoriad y flwyddyn nesaf.

Materion Ariannol a Chydymffurfio

12. Ni chodwyd unrhyw faterion.

Argymhelliad

13. Gwahoddir y Pwyllgor i:

- a. nodi'r crynodeb o ymatebion i'r ymgynghoriad ar ddyfodol y cynllun Tir Mynydd;
- b. cyflwyno sylwadau am yr opsiynau a nodwyd yn y papur ymgynghori. Yn benodol:

- cadw'r cynllun presennol (heb y rhwyd ddiogelwch) yn 2004;
- ymgynghori pellach yn 2003;
- cynnyddu isafswm yr arwynebedd porthiant cymwys o chwech i ddeg hectar;
- y dull arfaethedig o weithredu mewn perthynas â chyfraddau stocio.

Cyswllt

Rory O'Sullivan
Is-adran Polisi Amaethyddiaeth a Physgodfeydd
Est 1332

CONSULTATION PAPER ON THE FUTURE OPERATION OF THE TIR MYNYDD SCHEME

PURPOSE

1. This paper seeks your views on options to revise the Tir Mynydd scheme. Any changes to the existing scheme could be introduced for the 2004 scheme year. It is important to note that, if in the light of consultation, it is decided to re-shape Tir Mynydd, the prior approval of the European Commission will be required.

Details of the existing Tir Mynydd scheme are at **Annex A**.

Background

2. The Rural Development Plan for Wales includes a commitment to review the operation of the Tir Mynydd scheme and to propose revisions as appropriate. The options below take account of the proposals published on 10 July by the European Commission following its mid term review of the Common Agriculture Policy. The Commission's review conclusions can be viewed www.Wales.gov.uk and are the subject of a separate consultation exercise initiated by the Welsh Assembly Government on 17 July.

Timetable for revisions to Tir Mynydd

3. The introduction of change to the current operating parameters of Tir Mynydd from 2004 would require Commission agreement. The process for achieving this is through modification to the Tir Mynydd chapter of the Rural Development Plan for Wales (RDPW). This would need to be submitted formally to the Commission no later than November this year. Assuming Commission approval is forthcoming, change in scheme design could be reflected in the IACS literature that we would expect to send to all farmers in the Spring of 2003 so that they could prepare for the revised Tir Mynydd scheme from 2004.

Consultation Proposals

4. This paper sets out different approaches to modifying the existing Tir Mynydd scheme and invites your views. As an area based scheme under the RDPW, Tir Mynydd is not directly effected by the recently published proposals from the European Commission on the future shape of the CAP.

5. Over the forthcoming months there will be extensive discussion and negotiation over the CAP proposals before decisions at the European level are reached leading to implementation in 2004. This process will cover also measures to strengthen rural development measures and be of direct relevance to how in Wales we might deliver a broad based agri-environmental package for farmers. **Against this background, the preference of the Welsh Assembly Government is to make no changes to Tir Mynydd for the 2004 scheme year.** Rather, the view is that any changes to the structure of Tir Mynydd

should be informed by the outcome to the Commission's proposals. This implies a further round of consultation on the presumption that amendments to the existing scheme could be introduced from 2005.

6. With this in mind, the proposals outlined below ask for comment on:

- a. retaining the existing scheme, including the range of enhancements, for 2004 recognising that the current safety net mechanism ceases in 2003; and
- b. possible options for re-focusing Tir Mynydd in the future, with a commitment to further consultation.

7. The following paragraphs cover possible options. They comprise three key sections. The first section deals with **the flat rate, payment per hectare**; the second considers **eligibility criteria**; and the final section considers **enhancements**.

PAYMENTS PER HECTARE

Option 1: No change

8. Underpinning the approach for retention of the existing scheme's area based payments is that, by 2004, Tir Mynydd will have been in operation for three scheme years. It will be familiar to farming and environmental interests (see annex A). Current hectare payment level would continue to apply, including the taper arrangements, as follows

Eligible Forage area DA SDA

0-140 Hectares* £23 £35

140-640 £14.95 £22.75

640 + £6.90 £10.50

(Minimum forage area for eligibility at 6 has).

9. Explicit within this option is that the current safety net provision mechanism of Tir Mynydd, introduced only after difficult negotiations with the European Commission, does not apply beyond the 2003 scheme year. The Commission has made clear that there is no scope for a safety net provision from 2004. The ending of the safety net mechanism from 2004 is already covered in the RDPW.

10. In parallel, the Commission has indicated that the legal basis for changes to the direct subsidy support arrangements under the CAP, as outlined in the mid term review proposals, would come into effect on 1 January 2004. At the current time, it is not possible to forecast the outcome of the

negotiations at the European level to the future shape of the CAP arrangements that might apply from 2004. These decisions are unlikely to be known much before the early part of 2003.

11. This means that the farming community faces some uncertainty in the immediate future that could impact on planning in the longer term for the future direction of the farm business. It could be argued that to propose changes to Tir Mynydd, for introduction in 2004, might add pressures on individual farm business planning decisions.

Option 2: Future change in the flat rate payment and tapering arrangements

12. Under this option there would be two elements to the payment per hectare. The first, entitled "the gateway", would be area based comprising a tiered, flat rate payment on all eligible forage area within the Less Favoured Area of Wales. The second payment would be an enhancement for land in the SDA, "the SDA Trigger".

"The Gateway" Payment

13. The flat rate payment would decrease in bands in relation to the increasing size of the holding (as is the case with the existing scheme). This element would comprise 60% of the budget available. This could operate as follows:

Table 1: Indicative payments per hectare

	Budget	
	<u>RDPW budget Provision</u>	<u>Indicative Budget</u>
<u>Sizes</u>	<u>£27M</u>	<u>£35M</u>
< 200	£17.20	£22.30
200.01 – 500	£12.04	£15.61
500.01 – 800	£5.16	£6.67
800+	£0	£0

14. In altering the tiering mechanism, the intention is to focus on the traditional Welsh family farm, reflecting the policy direction set out in "Farming for the Future". Most family farms in Wales are less than 200 hectares in size. The minimum forage area would be raised to 10 hectares (see paragraph 20 below).

15. Subject to meeting the increased minimum forage area, all eligible land up to and including 800

hectares on a holding would attract a payment. The total area payment would reflect the operation of the appropriate size bands. In the case of those holdings with over 800 hectares of eligible forage area, the land in excess of 800 hectares would attract no payment.

The SDA Payment

16. The intention is to provide an additional payment to producers in the SDA. This element would comprise 30 per cent of the budget.

17. The Geographic Information System (GIS) is being used to verify the field boundaries and location of all the land (DA and SDA) which is eligible for Tir Mynydd. In time the GI system could be used to enhance land classification for use in future Tir Mynydd schemes. The proposal is that those farmers whose holdings include eligible SDA land, based on its identification in the GI system, would be eligible for an additional payment per hectare on that land **provided** their stocking rate is at, or below, 1.2 livestock units per hectare. Under the existing Tir Mynydd scheme, some 8,300 (69%) claimants are accessing the environmental enhancement for stocking at 1.2 lu/ha or below.

Table 2: Indicative payments for the SDA disadvantage trigger*

	RDP Wales Budget Provision	Indicative Budget
Budget	£27m	£35m
(total)	£14.00	£18.20

* Forage area stocking density from 0.3 to 1.2 LU/HA

Questions for consultees

Would you support retention of the existing payments per hectare (without the safety net) to continue from 2004?

Looking to the future and possible changes to Tir Mynydd, your view is invited on Option 2 and the proposal for a revised tiered system of flat rate payments.

Please also indicate whether you agree with the size range of the proposed bands.

Also, do you agree to top up the basic area payment on eligible SDA land subject to a minimum stocking rate of 1.2 Lus /ha?

ELIGIBILITY CRITERIA

18. An important component of the flat rate payments per hectare is the eligibility criteria. It is possible to alter the criteria currently applicable to Tir Mynydd in order to target the resources available at certain producer groups or environmental objectives. Similarly, these criteria could be applied to the Option 2 proposals. Possible future changes are outlined below.

Minimum forage area land criterion

19. The minimum forage area criterion under the existing Tir Mynydd scheme is 6 hectares.

20. In looking to the future adjustment of the scheme, there is an argument that producers with fewer than 10 hectares of eligible forage land in the LFA should not be eligible for support under Tir Mynydd. To increase the minimum forage area to 10 hectares would affect about 720 of the 11,957 claimants currently accessing Tir Mynydd. Some £170,000 is paid to these 720 claimants (an average of £236). Raising the minimum forage area criterion to 10 hectares would help further to target the funds at those in the LFA seeking to make an income from farming.

In looking at the future possible structure for Tir Mynydd, do you support an increase from 6 to 10 hectares on eligibility on the minimum forage area criterion?

Maximum forage area land criterion

21. There is currently no upper limit on eligible forage land in the existing Tir Mynydd scheme, though those with over 640 hectares are subject to a taper of 70%.

22. For the future, the intention, in the case of those holdings with over 800 hectares of eligible forage area, is that land in excess of 800 hectares would attract no payment. This would retain the 800 hectares cap that the Welsh Assembly intend introducing in 2003. It is estimated that some 47 claimants would be affected by this change, and includes interests that primarily are involved in non-farming activities, such as public utilities and institutions. It will act as a mechanism to curb over - compensation.

In looking to the future, do you support the introduction of an upper limit for eligible forage area claims? If so, do you agree with a cut-off of 800 hectares?

Stocking Rates

Minimum Stocking Rates

23. Under the existing scheme the minimum stocking rate is 0.1 lu/ha. The purpose in setting a

minimum stocking rate is to ensure that Tir Mynydd funds are targeted at genuine farmers using land for livestock production. This underlying principle is re-enforced by the proposals, for example, to increase the minimum forage area to 10 hectares and to cap payments at 800 has. To maintain consistency, the view of the Assembly Government is that options for future change should include an increase in the minimum stocking rate to 0.3 lu/ha.

24. The intention would be that producers with stocking rates below this new minimum because of their participation in an agri - environment scheme, would be exempt.

Do you think that the minimum stocking rate should be adjusted as proposed, as outlined above?

Maximum Stocking Rate

25. Although the existing scheme has no maximum stocking rate, all producers stocking at 1.8 lu/ha and above are subject to automatic inspection for evidence of overgrazing problems. In those cases where overgrazing is present the producer has to agree a management plan to address the problems, or risk having his/her Tir Mynydd payment withdrawn. The aim is that actions identified in the management plan, over a specified period, would enable the stocking density to meet the 1.8 lu/ha target.

26. For the future, the intention is to introduce a maximum stocking rate of 1.8 lu/ha. Any producer stocking above this limit would be ineligible to receive a Tir Mynydd payment whether or not there is any evidence of overgrazing

27. The code of Good Farming Practice would continue to apply. This is explained in Section 9.1 of the Rural Development Plan for Wales.

Do you agree that for the future there should be an absolute maximum stocking rate for the Tir Mynydd scheme? Is 1.8 lu/ha the appropriate limit?

ENHANCEMENTS

28. Prior to the introduction of Tir Mynydd, there was uncertainty whether the optional enhancements would be accessed by producers. In the event they have proved very popular with some 90% of claimants eligible for at least one enhancement under the existing scheme.

29. The Welsh Assembly Government is currently developing a new framework for the enhanced delivery of agri-environmental support in Wales, to offer wider access to farmers in Wales that is currently the position with Tir Gofal. The aim is to initiate industry consultation in the autumn. The preparatory work already undertaken suggests a tiered approach structured to enable the majority of farmers to receive payments in return for meeting basic environmental requirements.

30. To avoid any double funding with the anticipated agri-environment scheme, the enhancements associated with Tir Mynydd scheme could be re-focused. It would be possible therefore to simplify the existing enhancement regime by introducing in a future Tir Mynydd scheme only 2 two non-land based enhancements, as follows:

- The producer is a member of an UKAS accredited farm assurance scheme for beef and sheep farming. Farm assurance requires good standards of animal husbandry and animal welfare, and adherence to good farming practice. It is also an essential foundation for effective marketing of Welsh lamb and beef.
- The farm business has a business partner under the age of 40. This is intended to address concerns about the age profile of farmers in Wales, and to encourage young people to remain in rural areas working on farms.

31. Working on the basis that the enhancements would represent 10% of the Option 2 total budget, if a producer were able to satisfy both of the above criteria he would receive a top up of up to 10 % to his area payment . Satisfying one of the criteria would attract up to 5% extra.

Do you agree that a future Tir Mynydd scheme should include only 2 enhancements along the lines proposed?

CONCLUSIONS

32. There are basically three options on which your views are sought:

- to retain the existing Tir Mynydd scheme (without the safety net) - the status quo
- to modify the existing scheme by amending the stocking density rates, minimum and maximum forage land criteria and enhancements;
- to overhaul the scheme to recognise the greater costs associated with farming in the SDAs (Option 2, paragraphs 12 - 17).

33. ANNEX B sets out some worked up examples of the operation of the Option 2 scheme from 2004, assuming a division of the budget between the various elements as follows:

Element 1 Hectarage rate/gateway 60%

Element 2 Disadvantage trigger 30%

Element 3 Enhancements 10%

34. To assist consultees, ANNEX C compares payments under the existing Tir Mynydd scheme with those under Option 2, on the same budget.

Consultation Period and Next Steps

35. **The consultation period is 8 weeks and the closing date for comments is 30 September 2002.** A copy of this document is available on the Welsh Assembly's website (www.Wales.gov.uk)

36. An analysis of the responses to the consultation exercise will be the subject of a report from the Minister for Agriculture and Rural Affairs to the Agriculture and Rural Development Committee.

37. As indicated above, the Welsh Assembly Government is of the view that there is no pressing need to amend the Tir Mynydd from 2004. If, in the light of consultation, the weight of response favours the introduction of revisions from that year, proposals will be submitted to the European Commission. They would take the form of a modification to the Rural Development Plan for Wales.

Consultation responses

38. It is the Welsh Assembly Government's policy to make publicly available all replies to the consultation exercise. These will be placed in the Library of the National Assembly. If you do not wish your comments to be made available you should let Miss Maria Farr know when you submit your comments.

39. Please send any comments by 30 September 2002 to:

Miss Maria Farr,
Agriculture and Fisheries Policy Division 1,
Agriculture and Rural Affairs Department,
Welsh Assembly Government,
Cathays Park,
Cardiff,
CF10 3NQ.

Tel 029 20823740; e-mail maria.farr@Wales.gsi.gov.uk

TIR MYNYDD SCHEME 2001 to 2003 ANNEX A

Background

1. As part of the Agenda 2000 CAP reforms, EU Agriculture Ministers agreed in March 1999, that compensatory allowances for farming in Less Favoured Areas (LFAs) should change from headage to area-based payments, with a greater emphasis on environmental considerations.
2. Tir Mynydd, an area based payment, was introduced in 2001 to replace the Hill Livestock Compensatory Allowances Scheme (HLCAs). The Tir Mynydd scheme is a constituent part of the Rural Development Plan for Wales which provides a framework for the development of the whole of rural Wales.
3. Tir Mynydd, approved by the Commission in October 2000, satisfies the requirements of Council Regulation (EC) No 1257/1999 (Articles 13 (a) and 15) having regard for the objectives set out in Article 13 (a):
 - to ensure continued land use and thereby contribute to the maintenance of a viable rural community;
 - to maintain the countryside;
 - to maintain and promote sustainable farming systems which, in particular take account of environmental protection requirements.

Tir Mynydd Scheme Details

4. Sheep and/or suckler cow producers who farm at least 6 hectares of eligible LFA forage land qualify for area payments under the Tir Mynydd Scheme. A minimum stocking rate of 0.1 livestock units per hectare applies.
5. Tir Mynydd consists of two elements. Element 1 comprises LFA land area payments: £35 per hectare in the SDA and £23 per hectare in the DA. Element 2 provides for payment enhancements to Element 1 for confirmed environmental practice.
6. It was inevitable that an immediate switch from a livestock headage scheme to an area based scheme would result in a significant redistribution of funds. For this reason Element 1 payments are subject to the operation of a taper to minimise the number of winners and losers, and a safety net over three years to give producers time to adjust to the new scheme.

The Taper

7. To minimise the risk of over-compensation payments an area-based taper is applied to reduce payments to very large holdings as follows:

- The taper does **not apply** up to and including the first 140 hectares of eligible forage land on a holding.
- For holdings of over 140 hectares, payments on eligible forage land on that part of the holding in excess of 140 hectares, up to and including 640 hectares, are reduced by **35 %**.
- For holdings of over 640 hectares, payments on eligible forage land on that part of the holding in excess of 640 hectares are reduced by **70%**.

It is proposed that for the 2003 Tir Mynydd scheme, subject to the Commission's approval, a cap is imposed on holdings over 800 hectares so that land in excess of 800 hectares attracts no Tir Mynydd payment. Paragraph 22 of the paper refers.

The Safety Net

8. To allow farm businesses time to adjust to the new payment system safety net payments for TM 2001 and 2002 were respectively set at 90% and 80% of the HLCA 2000 payment. In 2003 the safety net will guarantee that farmers receive at least 50% of their HLCA 2000 payment as long as there have been no changes in their forage area or business. **There will be no safety net in 2004 and thereafter.**

Element 2 Enhancements

- **A.** the farm business comprises both breeding cows and sheep (i.e. at least one breeding cow for every 30 ewes in the LFA). The definition of breeding cow is determined by reference to Suckler Cow Premium claims and milk quota held.
- **B.** the farm is registered with UKROFS in relation to land not the subject of an agreement under either the Organic Aid Scheme or the Organic Farming Scheme. The farm must have completed conversion.
- **C.** the farm has at least 2%, with a minimum of one hectare, of the LFA area under one or more arable crops, root crops and /or field horticultural crops (excluding maize and grass ley). Land on which Arable Area payments are being claimed is not eligible.

- **D.** the farm has a stocking density at or below 1.2 livestock units per hectare. Data is drawn from Sheep Annual Premium Scheme and Suckler Cow claims.
- **E.** the claimant, exercising grazing rights on a common, registered under the Commons Registration Act 1965, within the LFA and all the other active graziers at the same time remove all stock from that common for 3 months, within the period September – February inclusive.
- **F.** the farm has an area equivalent to at least 2% of the LFA area of the holding (with a minimum of one hectare) as deciduous woodland, that is fenced and managed so that access for grazing may be permitted. Land attracting other CAP support under the Farm Woodland Premium Scheme is not eligible.
- **G.** the farm is registered under an approved farm assurance scheme accredited by the United Kingdom Accreditation Service (UKAS) in respect of beef and/or sheep production.

**Analysis of Gainers and Losers -
Number of Farms in Size (ha) Decile
Bands**

Table 1: Tir Mynydd 1- 2004 without a safety Net and no enhancements (£30.7m) compared to Tir Mynydd 2 (£30.7m) without element 3 enhancements

Deciles	1	2	3	4	5	6	7	8	9	10	total
Average hectares	8.2	16.2	25.9	37.7	51.4	67.6	87.6	116.1	161.4	353.4	93.7
Average payment: TM 1 (0%)	239	459	727	1,056	1,452	1,940	2,564	3,470	4,722	8,770	2,554
Average payment: TM 2	74	407	646	941	1,301	1,763	2,342	3,220	4,694	9,744	2,524
Average gain or loss	-165	-52	-81	-115	-150	-177	-221	-249	-28	974	-30

Table 2: Tir Mynydd 1- 2004 without a safety Net and no enhancements (£30.7m) compared to a Prorated HLCA budget (£30.7m)

Deciles	1	2	3	4	5	6	7	8	9	10	total
Average hectares	8.2	16.2	25.9	37.7	51.4	67.6	87.6	116.1	161.4	353.4	93.7

Average payment: TM 1 (0%)	239	459	727	1,056	1,452	1,940	2,564	3,470	4,722	8,770	2,554
Average payment: Prorata HLCA	325	368	592	928	1,261	1,749	2,443	3,441	4,915	9,413	2,554
Average gain or loss	-86	91	136	128	190	191	121	29	-194	-643	0

TIR MYNYDD 2 WORKED EXAMPLES: Option 2 with 800ha cut off & new minimum & maximum stocking densities

Example 1

850-hectare farms of which 250 hectares are SDA, also eligible for FAWL and business partner under 40 enhancements

Indicative Budgets	£27m				£35m			
	Payment Rate	Value of Claim	Payment Rate	Value of Claim	Payment Rate	Value of Claim	Payment Rate	Value of Claim
-								
Element 1: Flat Rate	per ha	£	per ha	£	per ha	£	per ha	£
<200	17.20	3,440	22.30	4,460				
500-200=300	12.04	3,612	15.61	4,683				
800-500=300	5.16	1,548	6.69	2,007				
850-800=50		0		0				
Sub-total 1		8,600		11,150				
Element 2: SDA Enhancement								
250	14.00	3,500	18.20	4,550				
Sub-total 2		12,100		15,700				
<i>Element 3: FAWL Business Partner under 40 Enhancements</i>								

FAWL & partner under 40 (10% of sub-total 2)				1,210		1,570
Total Claim				13,310		17,270

Example 2

350-hectare farms of which 0 hectares are SDA, also eligible for FAWL and business partner under 40 enhancements.

Indicative Budgets	£27m			£35m		
-	Payment	Value of Claim		Payment	Value of Claim	
Element 1: Flat Rate	Rate	£		Rate	£	
	per ha			per ha		
<200	17.20	3,440		22.30	4,460	
350-200=150	12.04	1,806		15.61	2,342	
Sub-total 1		5,246			6,802	
Element 2: SDA Enhancement						
None		-			-	
Sub-total 2		5,246			6,802	
Element 3: FAWL Business Partner under 40 Enhancements						
FAWL & partner under 40 (10% of sub-total 2)		525			680	

<u>Total Claim</u>				5,771			7,482

Annex 2

Summary of responses to Tir Mynydd Consultation

Please note comments are noted against the proposals as set out in the consultation paper – with general comments being recorded first. Where respondents have not commented on every aspect of the consultation no entry is made.

No	Name of Consultee	Consultation proposals	Comments
1	RSPB	<p>Q1- Option 1 retention of existing payments (no safety net) to continue from 2004?</p> <p>Q2 – Option 2 and revised payment tiers and size of bands</p> <p>Q3 -SDA top up subject to</p>	<p>General – Adamant that scheme should remain area based – acknowledges role of Tir Mynydd –stresses all inclusive approach to reform is needed.</p> <p>In favour – sees as supporting Farming for the Future and reinforcing growing commitment to move from headage to area based payment structures.</p> <p>Views option 2 as positive step forward, and approves of enhanced GIS emphasis, as outlined.</p> <p>Supports as long as option 2 implemented.</p>

		<p>maximum stocking rate of 1.2 lu/ha?</p> <p>Q4 - Minimum 10 ha forage area?</p> <p>Q5 – 800ha upper limit for forage area claims?</p> <p>Q6 - Revised minimum stocking rate of 0.3 lu/ha?</p> <p>Q7 Absolute maximum stocking limit of 1.8 lu/ha?</p> <p>Q8 – Only 2 enhancements in TM2?</p>	<p>Supports – suggests re-route resultant savings to environmental enhancements.</p> <p>Notes impact on their own farming of 4700has Lake Vyrnwy but supports move to focus on family farms Again suggests re-routing savings to environmental enhancements.</p> <p>Supports, provided dispensation given to farms stocking at less than this awaiting Tir Gofal entry.</p> <p>Supports maximum.</p> <p>Disagrees, wants to retain 6 enhancements at least until outcome of Tir Gofal scheme (broad and shallow) is known.</p>
2	<p>C R Davies</p>	<p>Q2 – Option2 and revised payment tiers and size of bands</p> <p>Q5 –800 ha upper limit for forage area claims?</p>	<p>Against option 2, supports current system.</p> <p>Would prefer tiers to retain current ha limit rather than go to 0-200 ha band, with decreases in payment being made steeper above that .</p> <p>Argues for 600ha rather than 800ha cut off.</p> <p>Supports all other proposals.</p>

Q1- Option 1 retention of existing payments (no safety net) to continue from 2004?

Q2 – Option2 and revised payment tiers and

size of bands

Q3 -SDA top up subject to maximum stocking rate of 1.2lu/ha?

Q4 - Minimum 10 ha forage area?

General comments : integrated comprehensive package of ecology friendly measures sought.

Argues for retaining the current scheme – with certain modifications (minimum forage area + maximum stocking rate) – keeping enhancements with extra funding, until MTR results known.

Sees the GIS technology as a good opportunity to target LFA payments according to a more accurate definition of natural handicap.

Supports option 1 - with existing enhancements until MTR results known. However, always supports additional incentives for reducing livestock densities to enhance biodiversity, protect soil and water and improve quality of agricultural production.

Generally in favour but wants to go further. Questions whether the aim is to reduce support to farms less than 160 ha.

Supports maximum rate of 1.2 lu /ha to access SDA top up.

Would prefer to see the resulting financial reward from this measure targeted to environmental enhancements.

Supports upper limit for eligible forage area as way of focusing support on family farms. No strong view on 800ha cut off provided it helps support sufficient labour to deliver sustainable farming.

Wants similar dispensation provisions for SSSIs as for agri - environment scheme

participants.

Maintain status quo – consider issue further.

Q5 – 800ha upper limit for forage area claims?

Endorses maximum stocking density 1.8LU/ha now, but looks for a lower density in SDA than DA in longer term.

Q6 - Revised minimum stocking rate of 0.3 lu/ha?

Supports option 1- ensure other changes to agricultural support are in place before making changes to enhancements. Seeking integration of incentives to deliver higher standards and increased protection.

Q7 Absolute maximum stocking limit of 1.8 lu/ha?

Argues that as Good Farming Practice is already a minimum requirement for TM participants higher environmental obligations should be instituted.

Q8 – Only 2 enhancements in TM2?

Definition of young farmer should be same as used by Welsh Assembly for FIG and FEG grants.

Partner under 40 years

4	Penderyn Commoners Association	<p>Q2 – Option 2 and revised payment tiers and size of bands</p> <p>Q3 -SDA top up subject to maximum stocking rate of 1.2 lu/ha?</p> <p>Q4 -Minimum 10 ha forage area?</p> <p>Q5 – 800 ha upper limit for forage area claims?</p> <p>Q6 - Revised minimum stocking rate of 0.3 lu/ha?</p> <p>Q7 Absolute maximum stocking limit of 1.8 lu/ha?</p> <p>Q8 – Only 2 enhancements in TM2</p> <p>Partners under 40 years of age</p>	<p>Supports changes to flat rate payments; agrees with revised tiers and size range of bands.</p> <p>Supports as realistic and workable.</p> <p>Supports 10 ha.</p> <p>Agrees limit of 800 ha.</p> <p>Q 6 & 7 Agrees both minimum and maximum provided that agri-env participants are exempt.</p> <p>Argues that all enhancements should remain.</p> <p>Believes the young farmers partner proposal will not be effective but willing to accept if all other enhancements kept too. Considers the farm assurance option is too much trouble and an additional tax.</p>
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5	Black Mountain Graziers Association 1	<p>Q2 – Option 2 and revised payment tiers and size of bands</p> <p>Q3 -SDA top up subject to maximum stocking rate of 1.2 lu/ha?</p> <p>Q4 -Minimum 10 ha forage area?</p> <p>Q5 – 800 ha upper limit for forage area claims?</p> <p>Q7 Absolute maximum stocking limit of 1.8 lu/ha?</p> <p>Q8 – Only 2 enhancements in TM2</p>	<p>Supports option 2, with indicative budget of £35 million used fully. Agrees size bands.</p> <p>Supports, but advocates stocking rate set at 1.4 lu/ha</p> <p>Agrees 10 ha minimum.</p> <p>Supports introduction of an upper limit and agrees 800 ha.</p> <p>Supported.</p> <p>Argues for all enhancements to remain.</p>
6	Black Mt Graziers 2	Q 1 Option 1 retention of existing payments (no safety net) to continue from 2004	Supports option 1: scheme is only 2 years old.
7	IGER	<p>Q 1 Option 1 retention of existing payments (no safety net) to continue from 2004</p> <p>Q2-7</p>	<p>Sees timing as crucial. Understands argument for delaying implementation in light of MTR but wants to see positive change as soon as possible.</p> <p>General comments :supports area-based payments for animal production in LFA.</p> <p>Supports tiers and size bands and proposals for enhanced SDA payments.</p> <p>Also agrees the proposed minimum and maximum stocking rates.</p> <p>Supports targeting support towards young farmers - wants to be assured that</p>

		Q8 – Only 2 enhancements in TM2	environment issues are fully addressed by Tir Gofal revision.
8	George, Davies & Evans, Solicitors on behalf of the Barony of Kemes	<p>Q1- Option 1 retention of existing payments (no safety net) to continue from 2004?</p> <p>Q2 – Option 2 and revised payment tiers and size of bands</p> <p>Q3 -SDA top up subject to maximum stocking rate of 1.2 lu/ha?</p> <p>Q4 -Minimum 10 ha forage area?</p> <p>Q5 –800 ha upper limit for forage area claims?</p> <p>Q6 - Revised minimum stocking rate of 0.3 lu/ha?</p> <p>Q7 Absolute maximum stocking limit of 1.8lu/ha?</p> <p>Q8 – Only 2 enhancements in TM2?</p> <p>Partners under 40 years of age</p>	<p>Supports retaining the present scheme for the 5 years following 2004.</p> <p>Q2 and 3 : Proposed payment rates coupled with the 1.2 lu stocking rate seen as inducing hardship.</p> <p>Agrees.</p> <p>Supports principle of limit, but argues that the maximum should be 1000 ha with a tier covering 800 – 1000 hectares.</p> <p>Supported.</p> <p>Against principle of fixed maximum stocking rates as quality of land varies widely throughout Wales. Areas need to be considered individually.</p> <p>Q8 Argues for retaining all enhancements.</p> <p>Believes that age profile of graziers is such that young farmer enhancements will not be significant encouragement to introducing new blood.</p>

9	<p>Mr Meddick</p> <p>Cefn Llwyd Farm</p>	<p>Q1- Option 1 retention of existing payments (no safety net) to continue from 2004?</p> <p>Q2 – Option2 and revised payment tiers and size of bands</p> <p>Q4 -Minimum 10 ha forage area?</p> <p>Q5 –800ha upper limit for forage area claims?</p> <p>Q8 – Only 2 enhancements in TM2?</p> <p>Partners under 40 years of age</p>	<p>Does not support retention of existing scheme.</p> <p>General comment</p> <p>Sees that effect of proposals would be dependant largely on scale of budget allocation.</p> <p>Would support introduction of upper limit but needs a lower cut off point or range band on SDA trigger payment for more equitable distribution of payments.</p> <p>Supports in principle: would prefer to retain 6 ha for existing claimants, with 10ha for new entrants.</p> <p>Supports 800ha limit for DA, but lower cut off for SDA or lower band trigger.</p> <p>Suggests accredited farm assurance enhancement at 10%, to include minimum stocking rate and cut off at 200 ha, to help small farms.</p> <p>Does not support the under 40 years partners enhancement: sees as potential benefit to larger farms only.</p>
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NFU Cymru

General comment

NFU consulted their members throughout Wales.

Regrets the timing of the consultation as it leaves little scope for manoeuvre before seeking Commission approval. Reluctant to support anything which results in less socio-economic support in climate of low level of farm income. Supports measures to retain native hill breeds, encourage suckler cow enterprises, co-operation and diversity. Wants the TM budget to be increased significantly.

Strongly advocates leaving TM unaltered until result of MTR is known.

Strongly urges extension of the safety net – or domestic equivalent.

The SDA top up seen to lead to unfair distribution of support.

Q1- Option 1 retention of existing payments (no safety net) to continue from 2004?

Q2 – Option 2 and revised payment tiers and

size of bands

Q3 -SDA top up subject to maximum stocking rate 1.2 lu/ha?

Q4 -Minimum 10 ha forage area?

Q5 – 800 ha upper limit for forage

Q 4 and 5 Sees no advantage in amending either the minimum forage area criteria or having a maximum eligible forage area: both seen as having only a marginal effect on the budget.

Advocates that TM2 be based on premise that land quality and capacity to carry

		<p>area claims?</p> <p>Q6 - Revised minimum stocking rate of 0.3 lu/ha?</p> <p>Q7 Absolute maximum stocking limit of 1.8 lu/ha?</p> <p>Q8 – Only 2 enhancements in TM2?</p> <p>Partners under 40 years of age</p> <p>Membership of FAWL</p>	<p>stock varies widely, rather than set stocking limits across the board.</p> <p>Suggests 0.15 lu/ha. Increasing minimum stocking density to 0.3 lu/ha seen as being unfair to farmers unable to stock at that level.</p> <p>Does not agree that there should be an absolute stocking density of 1.8lu/ha: current trigger for inspection is deemed to be sufficient safeguard.</p> <p>Against reducing number of enhancements before outcome of Tir Gofal review (ie broad and shallow scheme) is known.</p> <p>Approves the principle but doubts such a measure constitutes adequate incentive financially.</p> <p>Recognises that this might be funded through modulated funds. Needs to be addressed in light of MTR.</p>
11	Edward Naish	<p>Q1 Option 1 retention of existing payments (no safety net) to continue from 2004 ?</p> <p>Q6 - Revised minimum stocking rate of 0.3 lu/ha?</p>	<p>Supports option 1 : the scheme is relatively new.</p> <p>Questions increase in min stocking rate from 0.1 to 0.3 as some Eryri farms cannot sustain that rate.</p>

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**Welsh
National
Parks
Authority**

Q1- Option 1 retention of existing payments (no safety net) continue from 2004?

Q2 – Option2 and revised payment tiers and size of bands

Q3 -SDA top up subject to maximum stocking rate of 1.2 lu/ha?

Q4 -Minimum 10 ha forage area?

Q5 –800 ha upper limit for forage area claims?

Q6 Revised minimum stocking rate?

Q7 Absolute maximum stocking limit of 1.8 lu/ha?

Q8 – Only 2 enhancements in TM2

General Comments: TM very important to the NPA as farming is the major land use within the Parks. NPA supports LFA scheme purposes as stated in EC Reg 1257/1999 (articles 13a and15)

If status quo continues, want enhancements to continue also.

Tiered system should be designed to aid viability of family farms. They support an upper limit to avoid overcompensation.

Suggest bands could differ between DA and SDA as SDA farms tend to be larger. Agrees the move to 0.3 but expresses concern for farms stocking below proposed level and not in agri-environment scheme (suggest some dispensation for farms given support from relevant bodies like CCW and NPAS).

Not supported.

Supports this. Also supports the principle of financial upper limits to avoid over-compensation.

See comments against Q3.

Agrees, but suggests a lower maximum for SDA.

Argues for retaining enhancements until revised Tir Gofal implemented. New enhancements should be in place before existing ones are dropped.

13	Presbyterian Church of Wales	<p>Q1- Option 1 retention of existing payments (no safety net) to continue from 2004?</p> <p>Q2 – Option 2 and revised payment tiers and size of bands</p> <p>Q3 -SDA top up subject to maximum stocking rate 1.2lu/ha?</p> <p>Q4 -Minimum 10 ha forage area?</p> <p>Q5 –800 ha upper limit for forage area claims?</p> <p>Q6 - Revised minimum stocking rate of 0.3 lu/ha?</p> <p>Q7 Absolute maximum stocking limit of 1.8 lu/ha?</p> <p>Q8 – Only 2 enhancements in TM2?</p>	<p>Not in favour of option 1. Concerned about withdrawal of safety net.</p> <p>Supports option 2.</p> <p>Deems the Gateway payment as being too low as most farms are below 200ha: suggests higher payment below 200ha.</p> <p>Wants emphasis to be firmly placed on condition of land.</p> <p>Range and size of bands approved.</p> <p>Agrees.</p> <p>Generally supported.</p> <p>Agrees 800ha limit but wants review in light of increasing average size of farms and to accommodate family members entering farming.</p> <p>Supports 0.3 minimum.</p> <p>Supports in principle, but voices concern that measure will force diversification for smaller holdings. Suggests cross-stocking as part solution.</p> <p>Strongly supports 2 enhancements.</p>
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14	Voelas Estate Graziers Association	<p>Q1- Option 1 retention of existing payments (no safety net) to continue from 2004?</p> <p>Q2 – Option2 and revised payment tiers and size of bands</p> <p>Q3 -SDA top up subject to maximum stocking rate of 1.2 lu/ha?</p> <p>Q4 -Minimum 10 ha forage area</p> <p>Q5 –800ha upper limit for forage area claims?</p> <p>Q6 - Revised minimum stocking rate of 0.3 lu/ha?</p> <p>Q7 Absolute maximum stocking limit of 1.8 lu/ha?</p> <p>Q8 – Only 2 enhancements in TM2?</p> <p>Partners under 40 years of age</p>	<p>Supports option 1, pending review of CAP.</p> <p>Considers Option 2 is more advantageous to larger holdings. Advocates increase in the rates for lower size farms. Suggests different size bands to concentrate support for smaller holdings.</p> <p>Maximum stocking rate of 1.2 lu/ha seen as being unfair to improved farms barely surviving. Sees this as discriminating against smaller farms.</p> <p>Supports 10 ha lower limit.</p> <p>Supports principle of limit, but suggests 600ha.</p> <p>Supports, but foresees disadvantage to extensive hill farmers.</p> <p>1.8 seems appropriate but compares unfavourably with Tir Gofal limit of 2.4 and might adversely affect smaller farms.</p> <p>Sees 40 year old partner enhancement as being open to interpretation and therefore possibly abuse.</p>

			Prefers existing enhancements.
15	Forestry Commission	<p>Q1- Option 1 retention of existing payments (no safety net) to continue from 2004?</p> <p>Q2 – Option2 and revised payment tiers and size of bands</p> <p>Q3 -SDA top up subject to maximum stocking rate of 1.2lu/ha?</p> <p>Q4 -Minimum 10 ha forage area?</p> <p>Q5 –800ha upper limit for forage area claims?</p> <p>Q6 - Revised minimum stocking rate of 0.3 lu/ha?</p> <p>Q7 Absolute maximum stocking limit of 1.8 lu/ha?</p> <p>Q8 – Only 2 enhancements in TM2?</p>	<p>Advocates retaining the status quo option 1 until MTR outcome is known</p> <p>For longer term, supports option 2. Revised tiers and size bands acceptable.</p> <p>Supports.</p> <p>Argues 6ha limit should be retained in order to support the bio-diversity they see perpetuated by smaller farms.</p> <p>Reinforces aim of targeting help to smaller farms.</p> <p>Sees 0.3 as adding grazing pressure on smaller areas.</p> <p>Supported. This is an appropriate rate and should be enforced.</p> <p>Welcomes simplification of enhancements to 2 only: existing woodland enhancement seen as having caused confusion.</p>

16	<p>Organic Centre Wales</p>	<p>Q1- Option 1 retention of existing payments (no safety net) to continue from 2004?</p> <p>Q2 – Option2 and revised payment tiers and size of bands</p> <p>Q3 -SDA top up subject to maximum stocking rate of 1.2 lu/ha?</p> <p>Q4 -Minimum 10 ha forage area?</p> <p>Q5 –800ha upper limit for forage area claims?</p>	<p>General comment – Welcomes the continued shift of emphasis towards area rather than headage based payments. Advocates enhancing farm assurance scheme to include organic certification.</p> <p>Supported.</p> <p>No specific organic perspective here. To the extent that wider agriculture industry supports it, the Organic Strategy Group can.</p> <p>As above.</p> <p>Not opposed, but requests that implications for new entrants developing organic enterprises should be considered.</p> <p>Sees risk that valuable environmental initiatives from larger farms held by such agencies as RSPB, National Trust could be damaged by the limit. Requests a mechanism be devised to alleviate this.</p> <p>No objection, although there might be some risk to very extensive commercial</p>

		<p>Q6 - Revised minimum stocking rate of 0.3 lu/ha?</p> <p>Q7 Absolute maximum stocking limit of 1.8 lu/ha?</p> <p>Q8 – Only 2 enhancements in TM2?</p>	<p>moorland producers</p> <p>Agrees.</p> <p>This causes significant concern. It undermines the sustainable agriculture principle for schemes in the rural development regulation. OCW stresses that there is no mechanism for a formal link between TM and any revision to agri-env measures.</p> <p>Removal of organic farming enhancement, in absence of concrete proposals for the introduction of maintenance or stewardship payments, is a particular problem for organic sector.</p>
17	<p>Environment Agency</p>	<p>Q1- Option 1 retention of existing payments (no safety net) to continue from 2004?</p> <p>Q2 – Option2 and revised payment tiers and</p>	<p>General comments – The EA made several observations on the potential of Tir Mynydd to help prevent damage to the environment.</p> <p>The Agency suggests introducing several new enhancements designed to avoid soil erosion, manage ditches and wetlands and other measures.</p> <p>Would support if current enhancements retained.</p> <p>Offers support but suggests proportion of the budget allocated to this should be reduced to 30%, to allow more support for environmental enhancements. Agrees the size bands.</p>

size of bands

Agrees.

Q3 -SDA top up subject to maximum stocking rate 1.2 lu/ha?

Agrees principle, and supports increasing environmental enhancement payment with any saving made.

Q4 -Minimum 10 ha forage area?

Agrees principle, and supports increasing environmental enhancement payment with any saving made.

Q5 –800ha upper limit for forage area claims?

Supports, provided that appropriate arrangements are made for agri-environment scheme participants.

Q6 - Revised minimum stocking rate of 0.3 lu/ha?

Agrees there should be an absolute limit, and 1.8 is appropriate.

Q7 Absolute maximum stocking limit of 1.8 lu/ha?

Very concerned that this would reduce environmental elements of Tir Mynydd. Concerned to keep enhancements until environment support in general is secured elsewhere, and the National Sheep envelope is confirmed.

Q8 – Only 2 enhancements in TM2?

Regards requirements of current schemes as being very weak, and plethora induces confusion. Suggests a single scheme with appropriate environmental, as well as welfare and food quality measures.

Not supported: of little potential environmental benefit and prefer to continue with current enhancements until result of MTR known.

		<p>Farm assurance enhancement-</p> <p>Membership of FAWL</p> <p>Partners under 40 years of age</p>	
18	<p>Country Land & Business Association</p>	<p>Q1- Option 1 retention of existing payments (no safety net) to continue from 2004?</p> <p>Q2 – Option2 and revised payment tiers and size of bands</p> <p>Q3 -SDA top up subject to maximum stocking rate of 1.2 lu/ha?</p> <p>Q4 -Minimum 10 ha forage area?</p> <p>Q5 –800ha upper limit for forage area claims?</p> <p>Q6 - Revised minimum stocking rate of 0.3 lu/ha?</p> <p>Q7 Absolute maximum stocking</p>	<p>CLBA also refers to their response made in June 2000 to the emerging Tir Mynydd proposals.</p> <p>Supports: sensible to await outcome of MTR discussions before amending existing scheme.</p> <p>Supports in principle the SDA/DA differentiation, accepts 10 ha minimum, but implacably opposed to capping.</p> <p>Supports.</p> <p>Agrees.</p> <p>Opposes. CLBA maintains that payments should be scaled to land area but also reflect volume of public service delivered by that area.</p> <p>Agrees.</p> <p>Agrees, on the assumption that no holdings in receipt of TM currently stocking above that level without environmental implications.</p>

		<p>limit of 1.8 lu/ha?</p> <p>Q8 – Only 2 enhancements in TM2?</p> <p>Partners under 40 years old</p>	<p>Intentions are laudable but outcome less certain. Needs to be carefully defined to avoid abuse.</p>
19	<p>Hill Farming Advisory Group</p> <p>meeting 2/9/02 - minutes</p>	<p>Q1- option 1 retention of existing payments (no safety net) continue from 2004?</p> <p>3 -SDA top up subject to maximum stocking rate of 1.2 lu/ ha</p> <p>Q4 -Minimum 10 ha forage area?</p> <p>Q5 –800 ha upper limit for forage area claims?</p> <p>Q6 Revised minimum stocking rate of 0.3 lu/ha?</p> <p>Q7 Absolute maximum stocking limit of 1.8 lu/ha?</p> <p>Q8 – Only 2 enhancements in TM2?</p>	<p>Advocates waiting for the outcome of the CAP MTR before making changes. The group expressed concern over losing the safety net.</p> <p>Disagrees. Considers there is no need for lower limit on stocking density to qualify for SDA trigger.</p> <p>Supports.</p> <p>Wants further consideration of this to take place as it would penalise genuine farmers for the sake of curbing a very few institutions.</p> <p>Considers that minimum stocking rate should be 0.15.</p> <p>Not supported, advocates 1.8 to remain trigger for inspection but not as criterion for scheme eligibility.</p>

			<p>Advocates waiting for the outcome of the Tir Gofal (broad and shallow scheme) before making changes.</p>
20	<p>National Sheep Association</p>	<p>Q1- Option 1 retention of existing payments (no safety net) to continue from 2004?</p> <p>Q2 – Option2 and revised payment tiers and size of bands</p> <p>Q3 -SDA top up subject to maximum stocking rate of 1.2 lu/ha?</p> <p>Q4 - Minimum 10 ha forage area?</p> <p>Q5 –800ha upper limit for forage area claims?</p>	<p>The NSA advocates option 1 until the outcome of the MTR is known. Retention of safety net would be advantageous but they recognise the barriers to this.</p> <p>NSA favours this but with a lower cut off point (500-600 hectares) unless farm provides employment for others. This would discourage ranch farming and encourage rural development.</p> <p>Agrees principal of SDA top up, but 1.2 lu/ha would not always be appropriate because of different stock carrying capacity of the land. More flexibility should be built into the system.</p> <p>Not supported. Concerned it would disadvantage small family farms and new entrants</p> <p>Agrees in principle but reiterates comments against Q2 about providing employment. Suggests a hectare allowance to assist family partnerships who have brought businesses together to save costs.</p> <p>Agrees in principle but concerned that there is no calculation of the quality of the land built into equation.</p> <p>Not supported. Again emphasises need for</p>

		<p>Q6 - Revised minimum stocking rate of 0.3 lu/ha?</p> <p>Q7 Absolute maximum stocking limit of 1.8 lu/ha?</p> <p>Q8 – Only 2 enhancements in TM2?</p> <p>Partners under 40 years of age</p>	<p>assessment of the carrying capacity of land.</p> <p>Express reservations as to effectiveness: see it as delivering very little benefit.</p> <p>Suggest new enhancement relating to labour units to encourage greater employment.</p>
21	FUW	<p>Q1- Option 1 retention of existing payments (no safety net) to continue from 2004?</p>	<p>General comments</p> <p>FUW are concerned that the budget should be increased for Tir Mynydd for 2004, with more fundamental review of the scheme postponed until 2005.</p> <p>Strongly advocates development along the lines of the proposed new LFA scheme in Scotland which includes grazing categories and enterprise mix.</p> <p>Advocates option 1 (retaining status quo) until outcome of MTR and review of agri-env scheme provision known.</p> <p>Q 2 and 3 Discussion should not be limited</p>

Q2 – Option 2 and revised payment tiers and

size of bands

Q3 -SDA top up subject to maximum stocking rate of 1.2 lu/ha?

Q4 -Minimum 10 ha forage area?

Q5 –800ha upper limit for forage area claims?

Q6 - Revised minimum stocking rate of 0.3 lu/ha?

Q7 Absolute maximum stocking limit of 1.8 lu/ha?

Q8 – Only 2 enhancements in TM2?

to Option 2 proposals.

Not supported: seen as being detrimental to the interests of smaller farms.

Fully supportive of 800ha cut off.

Agrees principle of minimum : recommends 0.2 lu/ha.

FUW is totally opposed to this proposal. Supports retaining current approach where 1.8 triggers automatic inspection for signs of overgrazing.

Registers concern. Cannot support changes to enhancements until there is more detail about enhanced delivery of agri-environment support and agreement reached on preferred way of delivering the base payment.

22	Gwynedd CC	<p>Q1- Option 1 retention of existing payments (no safety net) to continue from 2004?</p> <p>Q2 – Option2 and revised payment tiers and size of bands</p> <p>Q3 -SDA top up subject to maximum stocking rate of 1.2 lu/ha?</p> <p>Q4 -Minimum 10 ha forage area?</p> <p>Q5 –800 ha upper limit for forage area claims?</p> <p>Q6 - Revised minimum stocking rate of 0.3 lu/ha?</p> <p>Q7 Absolute maximum stocking limit of 1.8 lu/ha?</p> <p>Q8 – Only 2 enhancements in TM2?</p>	<p>Supports</p> <p>Supports , sees as supportive of family farms.</p> <p>Supports</p> <p>Supports.</p> <p>Agrees</p> <p>Supports, provided that agri-environment scheme participants not discriminated against.</p> <p>Agrees.</p> <p>Disagrees. Supports status quo on enhancements.</p>
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