



Draft report on a regulation for establishing rules for direct payments

NSA CYMRU/WALES Response

Distribution of direct payments

Given that many sheep producers in Wales have historically received lower payments compared with more intensive approaches to livestock production NSA CYMRU/WALES believes that redistribution of payments from historic to area based would be of benefit to many Welsh, predominantly sheep farms. NSA CYMRU/WALES does however support the gradual move from historic to area based payments to all farm types in Wales time to adjust to any change in payments.

In addition NSA CYMRU/WALES would like to draw attention to comments made in The Common Agriculture Policy (CAP) Reform Conversation on the way forward for Wales regarding the differentiating of direct payments:

“Given the diverse land types and farming systems operating within Wales it is felt that a three tier differentiated payment system would be the most equitable approach to allocating direct payments. This system would be based on the same (or similar) classification as operated using the Less Favoured Area approach: Severely disadvantaged, disadvantaged and non-less favoured areas. Higher payments would be associated with non-LFA land with the lowest payments received on severely disadvantaged land. Such an approach may also help combat the ‘land banking’ of large areas of relatively unproductive land of which to claim Direct Payments”

Entitlements

NSA CYMRU/WALES continues to support the need to ensure any new entrants into agriculture between 2009 and 2014 are able to receive direct payments through the Single Farm Payment scheme post 2014 and therefore widening of the reference years would be welcomed. It is particularly important throughout reform of the CAP that the interests of new entrants are protected and a National Reserve which can act as a safeguard for those entering the industry would be supported. Furthermore NSA CYMRU/WALES would be in favour of methods which prevent or minimise land banking.

Greening

Provided an agri-environmental scheme does not unduly compromise the need for 'sustainable intensification' of agriculture the NSA CYMRU/WALES would support the principal that farmers under taken environmental options through such a scheme would be exempt from compulsory greening measures. Similarly to the views of Welsh Assembly Governments the NSA CYMRU/WALES is concerned that the current greening proposals will only lead to reduced competitiveness of Welsh lamb production whilst failing to deliver sustainable environmental benefits. The NSA CYMRU/WALES would therefore support the view that any greening measures should retain a large degree of flexibility between member states.

Small Farmers Scheme

NSA CYMRU/WALES would support the flexibility of a voluntary Small Farmers Scheme. NSA CYMRU/WALES is not sure really on the issue regarding moving from a 1,000 to 1,500 Euro ceiling.

Young Farmers

NSA CYMRU/WALES is in favour of the view that all new entrants into agriculture regardless of age should be able to access relevant support. In principal NSA CYMRU/WALES is in agreement that new entrants should have developed the relevant skills and training to ensure long term business viability but it is vital that the requirement for such qualifications do not unduly limit access to those who have already achieved a great deal of practical and technical experience. In addition such training should not require initial expenditure and/or penalise those who are in full time employment.

Active Farmer

Given the complexities of defining an active farmers and the likely availability of options to circumvent any regulations NSA CYMRU/WALES would support the use of a negative list to define an active farmer.

Flexibility between pillars

NSA CYMRU/WALES would in principal support flexibility between member states in the allocation of funds between pillar 1 and pillar 2 but would however like to draw attention to the response made within the The Common Agriculture Policy (CAP) Reform Conversation on the way forward for Wales regarding the allocation of funds:

“The need to secure funding for RDP activities is supported however as a principle we feel that wherever possible farmers should be able to receive the maximum amount of funding through Pillar 1 through which all farmers will benefit. Where funding is moved into Pillar 2 to support RDP activities it is vital that these activities themselves support productive and sustainable agriculture”

Cross-compliance

NSA CYMRU/WALES would support any amendments to the draft legislation which ensure that management and control systems are ‘proportionate and risk based’. Given the level of complexity involved in many regulations and the challenges of working in a natural environment NSA CYMRU/WALES would like to see such challenges taken into account when seeking to implement cross-compliance.

Whilst NSA CYMRU/WALES recognises the need for spot-checks and farm inspections wherever possible duplication should be avoided leading to unnecessary costs and a great deal of time spent away from the process of managing a farming unit.

Specific measures

NSA CYMRU/WALES would welcome any amendments which tackle the challenges of succession within Welsh agriculture. Given the level of investment required even in relatively small farming enterprises any support which can be provided to new entrants would be of benefit. In particular NSA CYMRU/WALES would encourage the ability of member states to provide funds to facilitate new entrants access to long term leases. Whether such funding should be available to all new entrants or to those under the age of 40 would however require careful consideration.

Agri-environment Climate

NSA CYMRU/WALES recognises the need to avoid double funding with regards to greening measures and agri-environmental schemes. However, when discussing such environmental measures it is vital that the role of sheep farming in maintaining the Welsh countryside is recognised and that any measures put in place provide real environmental benefits whilst supporting the need for sustainable intensification of food production. NSA CYMRU/WALES is not sure how best to comment with regards to the co-financing.

Areas of natural constraint

NSA CYMRU/WALES has always been a strong advocate of additional payments to Welsh farmers in areas of natural constraint through the Tir Mynydd payment system. NSA CYMRU/WALES is extremely disappointed that the decision has been made to remove this payment and will continue to lobby for the Welsh Assembly Government to reinstate such payments.

With regards to amendment 46 NSA CYMRU/WALES would like to highlight the importance of such payments to Welsh sheep producers and any EU wide definitions should recognise the challenges facing producers with particular reference to topography, rainfall and soil type

Electronic identification of animals

Given the well-recognised challenges associated with the widespread use of electronic identification in the national sheep flock NSA CYMRU/WALES would wholeheartedly support any amendment which prevents the penalisation of individual producers who are unable to comply with Statutory Management Requirements due to technical faults with the identification and registration system.

Water framework directive and pesticides directive

NSA CYMRU/WALES would like to highlight the importance of reducing unnecessary legislation burden on Welsh livestock producers but would however welcome a framework in which producers in all member states are compliant in order to prevent unfair competition.

Good agricultural and environmental condition

NSA CYMRU/WALES would support the amendment removing the burden of controlling invasive alien species and pests on individual producers and feel that such a requirement should be best implemented at a local government level. NSA CYMRU/WALES would however support any amendments which require landowners to participate and/or allow access in any control and eradication schemes of alien species and pest which prove a threat to the wider environment or to livestock production.