

## National Association For Areas Of Outstanding Natural Beauty (AONBs) – Response to Consultation Questions CAP Reform post 2014

***The National Association for Areas of Outstanding Natural Beauty (NAAONB) is a voluntary body whose membership includes all the AONB Partnerships/Conservation Boards in England and Wales, many of the Local Authorities with statutory responsibility for AONBs, a Trust which manages AONBs in Northern Ireland, as well as a number of voluntary bodies and individuals with an interest in the future of these nationally designated landscapes.***

*A number of AONB Partnerships/Conservation Boards have responded individually to this consultation and the comments of the NAAONB should be seen as supportive and supplementary to these.*

Thank you for the opportunity to respond to the CAP reform consultation.

### **Q1: What are your views regarding the direct payments proposals?**

The following are suggestions of things you may wish to include within your response:

- i. What do you think about the proposed structure of a basic payment and additional tiers?

*The concept of a basic payment supplemented by additional payments is supported. The main additional payment is the “green payment”. If the approach of the “green payment” is adopted it should be a compulsory requirement in order to qualify for the basic payment.*

- ii. Do you support the idea of a small farmer scheme?

*The idea of a simplified scheme for small farmers is supported, but we would be concerned if such a scheme involved reduced obligations relating to cross compliance.*

- iii. What do you think about the proposals to ‘top up’ young farmers’ payments for up to five years?

*Such a scheme should be linked to a requirement for continuing vocational training and professional development.*

- iv. What do you think about limiting payments to 'active farmers'?

*The management of important areas for landscape and biodiversity undertaken by NGOs such as the National Trust, the RSPB and County Wildlife Trusts is often based on livestock grazing. These organisations have benefited greatly from payments under agri-environment agreements. We would be concerned if the definition of active farmers and thus eligible land resulted in such organisations no longer being eligible for the basic payment or to enter agri-environment agreements. See also the comments on Q1vi.*

- v. What do you think a 'minimum level of agricultural activity' should look like?

*Maintaining the land is a condition suitable to be farmed would seem to be the most important requirement.*

- vi. What do you think about the proposal capping the Basic Payment Scheme; are the progressive reductions and the levels identified appropriate and do you think salaries should be taken into account?

*Given the need to contain the overall budget for the CAP and, in our view, a need to prioritise spending through the Rural Development programme, capping the Basic Payment Scheme is supported. We note, however, that capping, as currently proposed, could impact on organisations like the National Trust which were obliged to register the whole of their diverse land holdings in a single SPS claim, meaning that they would be affected significantly by capping, losing a significant share of the Basic Payment. Such organisations should be subject to special derogations.*

- vii. What do you think about the proposal to abolish existing SPS flat rate entitlements and establish new flat rate entitlements?

*This is not an area where we are qualified to comment.*

- viii. What do you think about the requirement to have claimed at least one hectare under SPS in 2011, to be able to establish entitlements in 2014?

*We have no views on this question.*

- ix. What do you think about the greening proposal; do you think this would provide environmental benefits; should greening be compulsory; should organic farms be exempt from these requirements?

*If carefully designed, the greening proposal could provide some worthwhile environmental benefits across all eligible land, but it would be no substitute for*

*a properly resourced and expanding programme of agri-environment agreements drawn up to reward farmers for specific action to deliver environmental benefits. As noted above (Q1i), our view is that if the greening proposal is adopted it should be a compulsory component of the direct payments proposal. Organic farms should not be automatically excluded from the requirements under the greening proposal.*

*We note that this proposal is likely to be resisted by many in the farming community who consider that a wholly voluntary approach to delivering environmental benefits should be the way forward. Voluntary action through the Campaign for the Farmed Environment has delivered some encouraging results but the overall achievements so far have been disappointing and the Campaign has not yet delivered all it promised. We are not convinced that a wholly voluntary approach could be sufficient.*

*As currently presented, the greening proposals lack flexibility to respond to local circumstances. While a simple and non-bureaucratic approach would be essential, the proposals on crop rotations and a flat rate requirement to put 7% of land into an ecological focus area seem simplistic. Maintaining permanent grassland is supported. See also the response to Q1x and the further point below on permanent pasture.*

*In the UK, would it be envisaged by government that the greening proposal would replace the objectives behind the Entry Level Stewardship scheme (ELS)? If so, we would wish to be assured that the resources currently allocated to ELS agreements would remain in Pillar 2, and thus available to expand the Higher Level Stewardship scheme (HLS) which is the priority in our view.*

*The nature of permanent pasture needs to be defined. Given that the objective is to retain environmental benefits and resource protection, the need is to protect long-established pastures and not short term leys.*

- x. What land do you think should be targeted in a farm's ecological focus area?

*The nature of the land which might be targeted will depend on the type of holding and current farming systems. With the aim of maximising biodiversity and landscape benefits, priority areas could include uncropped arable land and over-winter stubbles, buffer areas to streams and woodland, traditional orchards, hedgerows and landscape features of national, regional or local significance. Woodland creation should also be considered. Given the diversity in the farmed landscape, there is a strong case for regional menus and thus local targeting, which would be the most effective way of maximising local environmental benefits.*

- xi. What do you think about the proposals allowing coupled support?

*We understand that there may be a need for coupled support in circumstances where the continued viability of farming is threatened. Any support arrangements should include rigorous safeguards to avoid any incentives for environmental damage, for example through over-stocking or over-intensive cropping.*

**Q2: What are your views regarding the single common market organisation proposals?**

The following are suggestions of things you may wish to include within your response:

- i. Do you think the CAP should provide a safety net for producers?
- ii. What do you think of the new Crisis Reserve proposals?
- iii. What do you think about increasing the role of producer and inter branch organisations across all commodity sectors?
- iv. Do you think the proposal simplifies the existing arrangements?
- v. What do you think of the Commission's plans to update and streamline the rules and arrangements for public intervention and private storage aid?

*We have no views on this question.*

**Q3: What are your views regarding the rural development proposals?**

The following are suggestions of things you may wish to include within your response:

- i. Do you support the removal of axes from the new regulation and the proposal that the measures be used together? Do you agree with the removal of minimum spends?

*Removal of axes from the new regulation is supported and the concept of using the measures together in an integrated way where appropriate is welcomed.*

*We understand that the proposal is to retain a 25% minimum spend on environmental land management measures which would include agri-environment schemes and payments in the proposed Areas Facing Natural Constraints. There is a case, in our view, for extending the 25% minimum spend requirement to include any measures in rural development programmes which have clear environmental aims. In addition to agri-environment measures, these would include support for environmental co-operation agreements and non-productive capital spend.*

Do you agree with the six strategic priorities that the Commission has set?  
Are there priorities or actions you consider to be missing?

*Yes, we agree with the 6 priorities identified.*

ii. Which measures in this proposal do you think would be useful for you?

*From an environmental land management point of view, we are pleased to see the continuing priority afforded to priority iv – restoring, preserving and enhancing ecosystems depending on agriculture and forestry. We place a particular emphasis in the UK at sustaining and expanding HLS agreements and their equivalents in Wales and Northern Ireland.*

iii. Do you support the increased and strategic focus on innovation and technology? What benefits do you think it will provide?

iv. Do you support the new measure for organic farming?

v. Do you support the proposed measure to support agri-environment-climate schemes?

Do you agree with the proposal for groups of farmers to be eligible for these schemes?

*This proposal is welcome. Real benefits will come from packaging the measures exploiting the potential synergy between profitable enterprises and environmental land management objectives INCLUDE A COUPLE OF EXAMPLES*

vi. What are your views on the new Risk Management provisions?

vii. Are there any positive measures under the current rural development programme that you do not see continuing in these new proposals?

viii. Do you support a continued role for Leader, including a minimum spend of 5%? Do you agree that Leader should apply across the Common Strategic Framework Funds?

*The Leader programme has delivered valuable outcomes but seems to have been difficult to administer, particularly in the current programming period. We welcome a continuing role for Leader and its local priorities and delivery with access to all the Common Strategic Framework Funds, but also with its own dedicated funding, in line with the current proposals. This should greatly ease the delivery burden upon Local Action Groups (LAGs) and increase their ability to use funds flexibly to suit local circumstances, by comparison with the current arrangements. These changes should be accompanied by a UK level review of the way Leader is operated. A review should address the system for controls and reporting, to reduce its complexity and make it easier for local actors to access the funding available, in line with LAG strategies, and*

*appropriate "project areas" where we believe areas based on protected landscapes have considerable advantages.*

- ix. What are your views on the proposed "Areas facing Natural Constraints" designation, which is intended to replace the current Less Favoured Area?

*This proposal is supported*

- x. What do you think of the proposal for two separate discretionary payments to farmers in Areas facing Natural Constraints – an area-based direct payment top-up, and a compensatory payment under the Rural Development Regulation?

*The concept of two payments is supported but their purpose is very different and should be made clear. The area-based direct payment top-up should be just that: a payment in addition to the Basic Payment in recognition of additional costs and lower rewards in farming in the Less Favoured Area. Payments under the Rural Development Regulation should be towards specific actions to deliver particular environmental benefits and should not be seen as a compensatory payment.*

*We note, however, that the purpose of the basic payment in pillar 1 could just as easily be delivered by reducing the existing regional disparity in average area payments between LFA and non-LFA land.*

#### **Q4: What are your views regarding the financing, management and controls proposal?**

The following are suggestions of things you may wish to include within your response:

- i. What do you think about the removal of some of the Good Agricultural and Environmental Conditions (GAEC) and Statutory Management Requirements (SMR)?

*The Good Agricultural and Environmental Conditions (GAEC) and Statutory Management Requirements were introduced for good reason. We would be concerned if any simplification undermined the important purpose of these provisions: if anything, they should be strengthened. Incorporating the Water Framework Directive and Sustainable Use of Pesticides Directive requirements seems sensible, but it is not clear why some environmental directives and not others are included.*

*There should be full consultation and extensive discussion on this important aspect of the CAP reform changes, particularly with the introduction of the greening proposal which would deliver much of what cross-compliance is intended to achieve.*

- ii. What are your views on the Farm Advisory Service and expanding its responsibilities?

*The continuing availability of high quality advice to the farming community will be essential to deliver effectively on the European Commission's priorities. In times of budgetary constraints, advisory services have been an easy target for cuts. This is a mistake. There is currently no coherent and unified advisory service in the UK in response to this EC requirement, and the recent problems facing FWAG in England are a direct result of cuts in public sector funding for its work which has been highly valued by the farming community. More advice, not less is required but this could be from a range of sources to suit local circumstances. There is a need to get the basics right before looking to expand on the areas of responsibility.*

**Q5: What are your views regarding the proposals fixing certain aids and refunds?**

*We have no views on this question.*

**Q6: What are your views regarding the transitional arrangements for direct payments in 2013?**

*We have no views on this question.*

**Q7: What are your views regarding the proposals to support vine growers?**

*In the light of climate change, there would seem to be some scope for expansion of this sector in the UK. Any support measures for the sector should be available here.*

*Q8: Do you have views on any further areas you think we should consider concerning this package of CAP reform proposals?*

*From an environmental land management perspective, we reiterate here a concern that the final package of proposals should deliver sufficient resources in Pillar 2 to sustain and expand on the successful Higher Level Stewardship scheme in England and its equivalents in Wales and Northern Ireland.*

Response developed by Richard Lloyd, NAAONB Board Member  
January 2012