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Thank you for giving my Association the opportunity to reply to the issues resulting from the EU Health Check.

1.1

N.I. NSA accepts that Member States should have the option to adjust their SPS model towards a more flat rate system of support. We entered into the present N.I. system of support in the understanding that it would continue unto 2013. We would expect that a flat rate system would be beneficial to dedicated sheep farmers.

1.2

N.I. NSA feels that we have enough standards to comply with. The addition of any more requirements should only be accepted if others are removed.

1.3

N.I. Region has already accepted full decoupling and feels that if it were introduced fully by all other Member States it would create a more equal market place.

1.4

In regard to minimum & maximum limits to payments the bureaucracy and manpower required to apply these limits would outweigh any gains. N.I. NSA feels that there should be no change made.

2.1

N. I. is a small cereal producer with a ready market for all our grain but N.I. NSA feels intervention should not be removed. We cannot be sure of grain prices in the future and intervention is our only safety net.

2.2

In the current market set-aside is not required. Set-aside was introduced to control production not to enhance the environment. Countryside

Management Schemes are more focused to encourage environmental benefits.

2.3

Milk prices are no longer as buoyant as they have been recently and we see no reason to increase milk quotas. The removal of milk quotas would put pressure on environmentally friendly methods of dairy farming driving producers into more intensive systems.

2.4

N. I. Has full decoupling and N.I. NSA think in the interest of fairness all Member States should opt for full decoupling.

3.1

N.I. NSA sees no reason to change current policy and think the situation could be better assessed nearer to 2013.

3.2

N.I. NSA feels that existing instruments are adequate.

3.3

Compulsory Modulation is accompanied by Voluntary modulation and rises to 13% in 2013 which is already a considerable burden on payments. The 5000 euros franchise should be made optional and allow Member States to decide if it should be applied.