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Tassos HANIOTIS
Head of Unit
Agricultural Policy Analysis and Perspectives
Directorate-General for Agriculture and Rural Development
European Commission
Rue de la Loi 130 7/157
1049 Brussels, BELGIUM

by e-mail: (AGRI-G1-HC-IA@ec.europa.eu)

cc by e-mail: (joe.o'reilly@dardni.gov.uk)

Dear Mr Haniotis,

Re: Common Agricultural Policy (CAP) Health Check Proposals

The Royal Institution of Chartered Surveyors Northern Ireland (RICSNI), is the principal body representing professionals employed in the land, property and construction sectors and represents some 3,000 members. Our members practise in land, property and construction markets and are employed in private practice, in central and local government, in public agencies, in academic institutions, in business organisations and in non-governmental organisations.

As part of its Royal Charter, the Institution has a commitment to provide advice to the Government of the day and, in doing so, has an obligation to bear in mind the public interest as well as the interests of its members. RICS Northern Ireland is therefore in a unique position to provide a balanced, apolitical perspective on issues of importance to the land, property and construction sectors.

RICSNI welcomes the opportunity to comment on the Common Agricultural Policy (CAP) Health Check Proposals. Our comments are shown below.

Single Payment Scheme:

We agree that it makes sense to move towards a flatter, simpler, scheme for 2008-2013.

Cross Compliance:

This is inevitable. Our only concern is a potential lack of co-ordination at Government Department level in applying this. We can see further confusion arising if the new Soil Directive (which has recently been put on hold) is enacted. It is important that the NI Executive's Department of Agriculture and Rural Development responds quickly and implements it in a way which benefits farmers, and others concerned with land management.

Support levels:

We agree with the proposal for "sunset support". That is reducing payments over time, as long as this is made clear from the outset and the levels of reduction/support is transparent.

Cereal Intervention:

We agree with the proposal to review cereal intervention. We are now in a very different marketplace to five years ago.

Cereals set-aside:

The need for set aside is no longer relevant. However the environment aspect of protection would need to be addressed. The EU, and individual States would need to recognise the imperative to do something about energy crops and climate change (see below) and not just protect "the birds". There is more to environmental welfare than biodiversity.

Climate Change, Bioenergy:

We believe that the EU is not doing enough to recognise the potential contribution from agriculture towards bioenergy. Countries, such as Finland and Austria, already have enormous biomass reserves (i.e. trees), but those less favoured countries, such as the UK are doing little, actively, to develop or support new sources. The target for 1500 hectares of forestry in Northern Ireland over the next 5 years, in the NI Executive Draft programme for Government. That is equivalent to 0.1% of Northern Ireland's farmed area. The figure is pitifully low and will not, in any meaningful way, contribute towards the region developing an indigenous, bioenergy industry. The NI Executive still has a focus on converting biomass to electricity rather than biomass to heat, which is far more efficient.

Rural Development Programmes:

We would like to see more joined up working between the NI Executive Department of Agriculture and Rural Development (DARD) and the Department of Enterprise, Trade and Investment (DETI). At present we believe it is difficult for farmers and businesses to access the Rural Development Programme. Farm businesses cannot access business support from DETI. Similarly the regional economic development agency InvestNI, which comes under the remit of DETI, cannot support farm or agriculture related businesses.

Should you require any further comment or clarification on our response to this consultation please contact me on +44 (0)28 90322877.

Yours sincerely

Ben Collins
Director
RICS Northern Ireland