



# THE NATIONAL TRUST

*for Places of Historic Interest or Natural Beauty*

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## **European Commission Directorate-General for Agriculture and Rural Development**

### **Common Agricultural Policy (CAP) “Health Check”**

#### **The National Trust response in relation to specific issues regarding Simplifying the Single Payment Scheme**

The National Trust (“The Trust”) is the largest conservation charity in Europe, owning over 250,000 hectares of land. Most of this land cannot be sold under the provisions of an Act of the UK Parliament that allows The Trust to declare land ‘inalienable’, which must be held in perpetuity for the benefit of the Nation. Over 15,000 hectares of this land, spread over more than 370 individual production units in England, Wales and Northern Ireland, is managed in hand directly by The Trust, which makes them eligible to claim the Single Payment.

With support from the UK Government, The Trust has previously made the European Commission aware of several administrative issues created through the current requirements of Article II of Council Regulation (EC) n<sup>o</sup> 1782/2003 (“The Regulation”). With reference to the letter sent by the UK Government dated 1<sup>st</sup> October 2007, the subsequent meeting between the Commission, the UK Government and The Trust held on 11<sup>th</sup> December 2007 and following the recommendation of Jean Luc Demarty in his letter received by the UK Government on 31<sup>st</sup> January 2008, The Trust would now like the Commission to consider the following issue within the Health Check.

Under The Regulation The Trust is treated as a single farmer because of its organisational structure. This has created various problems:

- The Trust has to manage all in hand production units, of which there are over 370, under one Single Payment application, which has resulted in significant administrative problems and long delays in processing their application each year.
- The Trust is exposed to a disproportionate level of penalties in relation to each of the production units that applies for the Single Payment. This could result in an individual production unit having to bear an excessively large financial penalty relative to the Single Payment income it has generated.
- The Trust has 100’s of agreements under UK Rural Development Plan (RDP) Schemes (Pillar II of the CAP), which also have to be administered under the single farmer identity given to them by the UK government. This also creates considerable problems and can limit the Trust’s ability to deliver significant public benefits facilitated by RDP income.

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Charity Number: 205846

The National Trust would like to propose that the European Commission use the Health Check to incorporate an amendment into the definition of a farmer given in The Regulation. Any amendment could give member states the discretion in certain limited circumstances to allow approved charitable organisations a derogation from the current definition so they can be treated as multiple farmers of predefined holdings within their single organisation. This could allow member states to simplify the administration of the Single Payment Scheme for these few charities, where their size and claim complexity currently creates disproportionate complications. Charities such as The Trust contribute towards the provision of significant amounts of public benefits through the CAP. An amendment to The Regulation could assist the European Commission and these conservation charities in their joint commitment to improving rural development, climate change issues, water management and biodiversity through the CAP.

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