

COM(2007) 722 COMMUNICATION FROM THE COMMISSION TO THE COUNCIL AND THE EUROPEAN PARLIAMENT: Preparing for the “Health Check” of the CAP Reform.

A Response on behalf of the Ulster Wildlife Trust.

Introduction

The Ulster Wildlife Trust welcomes the opportunity to respond to this Communication. We are a local nature conservation charity with over 6,400 members working to achieve an environment rich in wildlife and valued by all. In this response we have restricted our comments to our primary concerns at this point in time but look forward to a continued engagement with the “Health Check” process.

The Single Farm Payment

The allocation of the Single Farm Payment should be clearly linked to the delivery of public goods. Such public goods will include flood protection, maintaining biodiversity etc as well as production of food.

The model adopted for allocating the Single Farm Payment should not penalise farmers in High Nature Value systems.

In relation to payment limits we believe that a clear link to the provision of public goods and a transparent process would provide reassurance to EU citizens. High landscape value, biodiversity and public amenity are often linked to smaller farmers. A legacy of the nineteenth century Irish Land Reform Acts is the large number of smaller owner-occupied holdings in Northern Ireland compared to holdings in England. Northern Ireland has, for example, over 12,000 family farms under 8 ESU (Source DARD Statistics: Farmers and Families in NI). The Ulster Wildlife Trust would not wish to see changes disincentives small farmers providing public goods.

In the light of the previous paragraph we would ask you to note that attempts to define “real” farmers could have negative impacts in peripheral regions, including island communities. Such peripheral areas often coincide with HNV farmland. In such locations it is common to derive income from a variety of sources, including agriculture.

Biodiversity and Climate Change

The Common Agricultural Policy should reinforce biodiversity maintenance at the landscape level (e.g. by increasing habitat connectivity) and thus contribute to Northern Ireland’s ability to adapt to climate change.

Cross-Compliance (SMR and GAEC)

The Ulster Wildlife Trust wishes to see further refinement and improvement of the biodiversity aspects of cross-compliance. We would wish to see the effectiveness of changes to cross-compliance monitored and evaluated. Article 69 of the Horizontal Regulation, with changes, could be used to more clearly target CAP support to the delivery of public goods. The re-targeted payments should be linked to the environmental value of the land management. We understand that BirdLife is suggesting that the HNV concept is the best way to target funds without risking accusations of the “re-coupling” of subsidies to production.

Set-aside

While Northern Ireland does not have a large area of land in set-aside changes to this should be consistent with the environmental goals of the EU, particularly in relation to the 2010 biodiversity target.

In conclusion, we hope our comments are constructive and we welcome the “Health Check” process for the opportunities it offers to develop a constructive debate about sustainable agriculture and payment for public goods derived from management of agricultural land.

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