



for a living planet

WWF Northern Ireland

13 West Street, Carrickfergus

Co Antrim BT38 7AR

t: +44 (0)28 9335 5166

f: +44 (0)28 9336 4448

e: amcgarel@wwf.org.uk

www.wwf.org.uk/northernireland

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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

Dear Mr Haniotis,

1. Common Agricultural Policy (CAP) Health Check Proposals

- 1.1 WWF Northern Ireland is part of the world's largest voluntary conservation organisation, with a global network operating in 90 countries. WWF's mission is to take action to protect the environment for the benefit of people and nature and it endeavours to conserve endangered species, protect endangered spaces and address global threats to the planet by seeking sustainable solutions.
- 1.2 Endeavouring to ensure the protection, restoration and enhancement of freshwater globally is one of WWF's six key areas of work. It is therefore hopeful that this opportunity to make modifications to the CAP will result in a significant reduction of pressure from agriculture on freshwater and even offer greater opportunities to provide practical ways to restore and enhance them.
- 1.3 WWF Northern Ireland stresses that there is an urgent need for this as agriculture has been having a detrimental influence on water quality and quantity for many years during the production-focused era of the CAP.
- 1.4 Following the introduction of decoupling, fine tuning the CAP now could and should encourage a more sustainable system of food production that also recognises the value of and encourages production of the non-marketable agricultural goods that have become increasingly important to citizens in a region of the globe where food in general is no longer in shortage.

2. Simplifying the Single Payment Scheme

- 2.1 With respect to which rules could SPS be further simplified without negatively affecting the functioning of the system?



It is vitally important in terms of achieving sustainable agriculture that Member States are not able to make significantly different decisions from each other in a way that would lead to the distortion of competitiveness. Therefore further simplification should be sought by encouraging if not enforcing every Member State to have the same SPS model.

- 2.2 Do you agree that Member States should be allowed to adjust their SPS model towards a more flat rate of support, at national or regional level?

WWF Northern Ireland does not believe the current historic component of the SPS is defensible in the longer term as it is perpetuating a rewarding an intensive approach towards farming when it is now generally agreed that this is no longer what is required within Europe. It would therefore encourage the Commission to consider requiring all Member States to move to a flat rate of support at all levels.

- 2.3 What type of impacts would you expect with the introduction of flatter rates of support for farmers?

WWF Northern Ireland would anticipate the introduction of flatter rates of support would enable farmers to farm their land in the most appropriate way for its long term sustainability. It also believes that a flat rate of support can be better justified through the cross compliance mechanism both to European tax payers and wider global pressures such as WTO.

WWF Northern Ireland notes however that for this to be truly effective it must be applied universally across all Member States. Allowing Member States to retain a historic component will undermine this approach both in term of competitiveness and perception.

3. Cross Compliance

- 3.1 What would be the potential outcome of maintaining the cross-compliance at its existing standards?

WWF Northern Ireland believes that cross compliance has resulted in significant benefits to the farmed environment across Europe. It also ensures that European taxpayers understand the benefit and need for farm support and ensures the system is defensible to countries outside Europe.

The current standards are still being tested, as are the mechanisms for assessing them and there should be no significant changes made until a full appraisal can be made of how successful the process has been. WWF Northern Ireland believes there should be no weakening of current cross compliance conditions and efforts should be made to improve its efficiency and impact in all Member States.

- 3.2 What impacts do you see emerging with the possible addition/deletion of certain legal requirements or GAEC standards?

GEAC standards offer Member States the opportunity to address issues of concern to their country or regions that are not covered by the SMRs. Used in this way they can be of considerable benefit and WWF Northern Ireland believes that again after a suitable period each Member State's GEAC



measures should be assessed against their delivery of their objectives. Until this comparison has been completed, WWF Northern Ireland can see no reason for major changes to be made to GEAC measures.

4. Partially coupled support

- 4.1 Should decoupling be applied in full extent to all sectors? Would there be specific impacts with this option?

WWF Northern Ireland believes that decoupling should be applied in full extent to all sectors.

- 4.2 Should decoupling be applied in full extension but negative impacts mitigated by alternative flanking measures? In this case, what kind of measures?

However, WWF Northern Ireland can envisage situations where there would be a case to flank negative impacts. It would support the use of National Envelopes and believes the Health Check should take the opportunity to assess where and under what conditions they could be used to support specific farming sectors that are facing difficulties in terms of economic viability but which play an essential role in maintaining landscape character and wildlife habitats.

- 1.2 Are there any sectors where targeted, partially coupled support should remain and which problems do you consider this support to mitigate?

Northern Ireland has recently produced a 'Red Meat Strategy' that indicated primary production of red meat was in serious jeopardy due to lack of profitability. Well managed mixed grazing is an important component of protecting vulnerable uplands habitats and WWF Northern Ireland would consider it appropriate to use partial support, like National Envelopes, to underpin this mainstay of the agricultural sector in this region of the UK where it is clear that sustainable agriculture depends on it.

5. Cereals and set-aside

- 5.1 Do you consider the abolition of set-aside in the current context of market and policy developments is appropriate?

WWF Northern Ireland is very aware that set-aside was a mechanism that was developed to control the production of food and struggles to justify its retention in its current form for that reason. However over the years it has been realised that there are significant biodiversity and water quality benefits from allowing land to remain uncultivated for long periods and it would be sorry to see this benefit lost.

WWF Northern Ireland would therefore like to see a mechanism developed that produced the same benefits of creating wildlife habitat, buffering water courses, extending semi-natural habitats,



protecting archaeology and enhancing landscapes, and rotational set-aside which is providing an important food source for farmland bird populations but presented honestly and openly for the purpose it served. Recognition that set-aside plays an important role in meeting the EU Gothenburg target of halting biodiversity decline by 2010, as well as Water Framework Directive targets for achieving good ecological status in water bodies might provide the justification for having such a mechanism that would need to remain associated with the larger arable farms to derive maximum benefit.

- 5.2 What measures do you consider appropriate in order to maintain environmental benefits associated with set-aside?

WWF Northern Ireland would like to see a mechanism for Pillar 1 payments to be used directly to enable, i.e. require, larger arable farmers to set-aside land to the same extent as previously required but make sure the criteria will deliver biodiversity and water quality benefits. Alternatively payment could be made through Pillar 2 but they should be ring fenced for this purpose and kept outside voluntary agri-environment schemes.

6. Climate change, bio-energy, water management and biodiversity

- 6.1 Do you consider that existing instruments under both pillars of the CAP are sufficient to respond to these challenges?

WWF Northern Ireland believes that by and large the existing instruments form a sufficient basis for responding to the challenges of climate change, water management and biodiversity. However it is largely left to Member States to allocate funding to various measures which affects take-up and delivery. If Europe is determined that these measures will help to contribute to its Kyoto, Water Framework and Habitat Directive obligations it needs to be more prescriptive on Member States as to their allocation of funding and how the instruments are interpreted and used.

WWF Northern Ireland is particularly concerned about the potential for support for biofuels from crops to be counterproductive and urges a review of the risks this particular measure holds for European and International biodiversity and contribution to global warming gases.

Water management measures will similarly need to address both existing challenges on water quality, reinforcing those being addressed by the Water Framework Directive, and changes to land use to manage water to deal with the challenges that arise from climate change, including storage of flood water and coastal realignment.

- 6.2 If you consider that strengthening Rural Development instruments is needed, what would be your proposal in better addressing these new challenges?



WWF Northern Ireland welcomes the proposal to increase funding to Pillar II through the increase in compulsory modulation across all Member States. It is essential that the Health Check results in more funding becoming available for rural development. In the longer term we believe the CAP must evolve to support sustainable land management and to address the environmental challenges we are facing and in the short term an increase in rural development funding is crucial to achieve this.

However, it is concerned that allowing Member States the opportunity to draw down additional voluntary modulation is counterproductive as it has a significant impact on the competitive ability of farmers. The principle success of Pillar 2 measures for the environment depends on farmers being in a sufficiently robust financial position to access schemes and measures.

7. Strengthening rural development

- 7.1 Do you think the proposed increase in modulation will help in achieving RD objectives, especially those linked to new challenges?

WWF Northern Ireland strongly supports the Commission's proposals to increase the rate of compulsory modulation and believes that the additional funding will be vital in addressing the new challenges that have been identified.

- 7.2 How do you think the extra funds should be allocated to better respond to those new challenges?

WWF Northern Ireland would like to see the extra funds raised from increased compulsory modulation deployed within Axis II of the EAFRD for agri-environment measures. This would help to address the shortfall in funding for rural development as a consequence of the EU Financial Perspectives decision of 2005. Given both the current and new challenges facing Europe's environment agri-environment schemes, a substantial increase in funding is needed to deliver the changes to land management that are required. It will be particularly important to target agri-environment schemes at traditional farming systems that manage and enhance Europe's high quality landscapes and which maintain important wildlife habitats and historic environment assets.

Additionally, adapting farming practices to make them more sustainable will also be important so that agriculture across each Member State can reduce its emissions of greenhouse gases and protect soil and water resources.

We thank you for the opportunity to make these comments.

Yours sincerely

Alex McGarel

Freshwater Policy Officer WWF Northern Ireland