

Health Check of the Common Agricultural Policy: Wildlife and Countryside Link Position Statement On Revised Article 69 / National Envelopes

Wildlife and Countryside Link (Link) brings together voluntary organisations in the UK concerned with the conservation, enjoyment and protection of wildlife, countryside and the marine environment. Our members practice and advocate environmentally sensitive land management and food production practices and encourage respect for and enjoyment of natural landscapes and features, the historic environment and biodiversity.

Taken together, our members have the support of over eight million people in the UK and manage over 476,000 hectares of land.

This position statement is supported by the following organisations:

- Association of Rivers Trusts
- Buglife - the Invertebrate Conservation Trust
- Butterfly Conservation
- Campaign for National Parks
- Campaign to Protect Rural England
- Council for British Archaeology
- Froglife
- Grasslands Trust
- Herpetological Conservation Trust
- Open Spaces Society
- Plantlife International
- Ramblers' Association
- Royal Society for the Prevention of Cruelty to Animals
- Royal Society for the Protection of Birds
- The Wildlife Trusts
- Woodland Trust

Commission Proposal

To allow more flexibility in Member State responses to the needs stemming from the overall orientation of the CAP, it is proposed that Article 69 be broadened:

- *The restriction that linear reductions are taken from and staying in the same sector is removed.*
- *Measures to address disadvantages for farmers in certain regions specialising in the dairy, beef and sheep and goat meat and rice sectors are covered.*
- *It also allows the possibility to use the retained amounts to top up entitlements in areas subject to restructuring and/or development programs*
- *Support for some **risk management measures** -crop insurance schemes for natural disasters and mutual funds for animal and plant diseases- is also provided under certain conditions. (The provisions on exceptional market support measures to animal diseases are to be dealt in this horizontal provision on risk management and are deleted from the single CMO)*

- *Measures, which do not with certainty meet the conditions of the WTO Green Box, should be limited to 2.5% of the ceilings.*
- *Finally, Member States applying SAPS will also be allowed to apply this provision.*

Link position

Link supports the use of National Envelopes where they are used to support farming that delivers environmental outcomes.

We believe the Health Check provides an opportunity for Defra to assess where and under what conditions National Envelopes could be used to support specific farming practices that are facing difficulties in terms of economic viability but which play an essential role in maintaining landscape character and wildlife habitats. For example, support for sustainable upland sheep and beef farming where this provides high nature value for landscape character, biodiversity and the historic environment.

Link agrees with the six criteria proposed by Defra for the use of National Envelopes in its response to the Health Check but believes environmental criteria could also be added to strengthen the criteria.

Link does not support the use of National Envelopes funding for insurance schemes that perpetuate unsustainable farming practices following a disease outbreak or natural disaster. For example restocking at unsustainable levels or replanting areas with plant species that are damaging to the environment, for example because they have a high water demand in drought areas.