

Rt. Hon Margaret Beckett MP  
Secretary of State  
Department of Environment, Food and Rural Affairs  
Nobel House  
17 Smith Square  
London  
SW1P 3JR

Friday 4<sup>th</sup> April 2003

Dear Secretary of State,

**RE: CAP Mid Term Review proposals**

I would like to thank you for your reply to our earlier letter concerning the CAP Mid Term review proposals. It is heartening to know that you are putting the case for reform so forcefully within Europe. However we are aware that many other European Union countries are putting their own proposals to the Commission, some of which we may support and some we see as weakening the whole reform package. We would very much like to have a meeting with you as soon as possible. In the interim, we summarise our current concerns in this letter.

In our earlier letter we urged the UK Government to continue to support the case for modulation commencing in 2004. We still believe this to be crucial to the reform of the CAP. We also supported a proposal to remove the franchise and set a flat rate of modulation at 19% for all farmers in receipt of decoupled payments. This would ensure that there are sufficient funds to properly finance the UK's Rural Development Programme, and in particular Agri Environment Schemes. The funds raised through modulation should be used to fund Pillar II payments, rather than pay for reform of the Dairy and Sugar Regimes.

We still think that cross compliance requirements should go beyond regulatory obligations, and that all funding withheld from farmers in breach of these requirements should be transferred to the Rural Development Programme of the Member State in question. We believe the cross compliance requirements should be strengthened to embrace the concept of integrated land management. Cross compliance requirements should secure the many external public benefits and reduce the environmental damage that can arise from land management. Ensuring that these are addressed in Annexes 3 and 4 would secure environmental benefits, not just in the United Kingdom, but also across the countries of the European Union.

We support the proposal to link the listed Directives containing animal welfare measures to cross compliance requirements. We would support a framework that had the flexibility to allow a risk-based approach, which would achieve maximum environmental compliance at a minimum cost and the least burden on farmers.

We are concerned that current proposals offer inadequate protection to the historic and cultural dimension of the farmed landscape. This is an issue throughout Europe. In the UK only Scheduled monuments are mentioned in the Codes of Good Farming Practice, thus excluding the majority of archaeological features and historic

landscapes: this needs to be addressed to halt the irreversible degradation of archaeological sites on farmland.

We are concerned that farmers are already considering significant change to their farming systems once the Single Income Payments become available. To ensure that the changes to the payments system at the very least do not have a negative environmental impact, we think that the farm advisory 'audit' must be compulsory for all farms in receipt of public funds and that payments be linked to good land management. It should be made clear to farmers that the receipt of public funds carries with it obligations to go beyond legislative requirements and furthermore, that these are not simply payments due to any farmer who has managed to avoid conviction for any breach of legislation.

To ensure that standards of animal welfare do not decline but continue to improve we urge the government to more fully support the proposal to give improved levels of support for farmers who go beyond basic good animal welfare practice.

We continue to urge the Government to resist moves to increase and extend the lifetime of the milk quota system. Reform of the Dairy Regime should take place so that the incentive to produce surpluses (and, as a result, subsidised exports) is removed and supply and demand are matched. Support for the sector should, in the future, be conditional on achieving higher animal welfare, environmental and public health standards.

We hope you will be able to take these concerns on board, in the interests of conservation of the environment and of animal welfare. We will in turn continue to make every effort to work with European colleagues to ensure a positive outcome for CAP reforms.

Yours sincerely,

John Cousins  
Chair of Wildlife and Countryside Link's  
Farming and Rural Development Working Group

On behalf of the following member organisations:

Buglife: the Invertebrate Conservation Trust  
Butterfly Conservation  
Council for British Archaeology  
Campaign for the Protection of Rural England  
Open Spaces Society  
Plantlife  
Ramblers Association  
Royal Society for the Protection of Birds  
Royal Society for the Prevention of Cruelty to Animals  
Wildfowl and Wetlands Trust  
Woodland Trust  
The Wildlife Trusts