

## **Health Check of the Common Agricultural Policy: Wildlife and Countryside Link Position Statement On Set-aside**

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**

*Removal [of] set aside obligation. Set aside entitlements become normal entitlements. Compensation of environmental effects of its removal will be done by the addition of a standard under GAEC on "establishment of buffer strips along water courses". (Annex III)*

### **Link position**

Link is seriously concerned about the potential for continued loss of the environmental benefits of set aside and believes its abolition should be accompanied by a comprehensive replacement mechanism. Link is supportive of the abolition of set aside following, decoupling of CAP payments from production, providing the environmental benefits that set aside has provided are retained through alternative mechanisms. Without these we believe extensive areas of important wildlife habitat, including feeding habitat for farmland bird populations and increased habitat connectivity, will be lost and water courses will be subject to increased diffuse pollution. In addition the loss of areas of 'permanent' set aside will result in archaeological sites being damaged and landscape diversity reduced.

Link does not believe that the focus of new GAEC measures proposed by the Commission on water bodies will adequately replace the biodiversity benefits of set aside.

Link believes that a new mandatory mechanism should be introduced before set aside is abolished. This should require each farm holding receiving the Single Farm Payment to designate a percentage of land for environmental measures to protect water bodies from diffuse pollution, retain important wildlife habitat, buffer existing habitats and add to the diversity of the farmed landscape. This could be best accomplished by creating a new cross compliance measure until a new mandatory EU wide requirement is introduced as this would ensure all farms provide similar environmental benefits a those delivered by set aside.

Link welcomes the recent announcement by the Secretary of State for the Environment that tasked Natural England and the Rural Payments Agency with developing such a measure, to be implemented in conjunction with options from Environmental Stewardship. Link supports the UK Government in taking forward this approach and in setting an example for the rest of the EU.

An assessment needs to be made of the amount of land that would be needed on each holding to replicate and enhance the environmental benefits that the considerable public investment in set aside policy has provided since its introduction. The area to be dedicated primarily to environmental measures should be substantial and enough to, at the very least, retain the benefits already identified from existing set aside land. It will not be acceptable for the percentage of land required to represent a major decline in environmental management. Targets would also be needed to ensure that new measures adequately replace, and hopefully surpass, the previous benefits of set aside.

Link is very disappointed with the rather perfunctory assessment of the impact on landscape character on page 17 of the Impact Assessment of the Health Check. Recently published Defra commissioned research by ADAS/SAC on the environmental impacts of Pillar I reform and the implications for Axis II funding provided a very good analysis of potential changes to landscape character. Link would like a more considered assessment to be made.

Link continues to believe that if the burden of mitigating for the loss of the environmental benefits of set aside was placed on Environmental Stewardship, then there would be an urgent need for the additional transfer of ring-fenced funding to avoid additional demands on the existing agri-environment budget.

Link hopes that Defra will put forward a strong case to the Commission that Member States should be provided with the means to introduce cross compliance measures that replicate all of the environmental benefits previously provided by set aside.