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12.11.04

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Dear Ms Bashir

The Farm Woodland Forum is delighted to be asked to make a submission to this consultation.

The Forum aims to facilitate the generation and exchange of information that supports best practice in and improves opportunities for *farming with trees*. We are an informal group of about 220 people with a common interest in farming with trees in all its aspects. Until 2003, we were known as the UK Agroforestry Forum.

The Forum holds annual meetings at which there are presentations to describe the latest research, development and practice related to agroforestry and farming with trees. There are also field visits to sites of interest. More information is available on www.agroforestry.ac.uk. At the Annual General Meeting in June 2004, it was agreed that the Forum would seek charitable status.

Yours sincerely

Gerry Lawson MICFor MIBiol
(Vice Chair)

Response to questions on the Draft Rural Development Regulation 2007-2013 (English Consultation – due by 12/11/04)

Q1. Should the regulation do more to contribute to wider EU environmental objectives?

Yes, but.

Q1a. Can you support your answer?

DEFRA's criticisms in the 'discussion points' are only partly justified. There are important innovations in this document and the accompanying 'Extended Impact Assessment' (com(2004)490 final):

- a) reference to the EU Forest Strategy, UNFF, Helsinki Conference on Forests; Goteborg conference etc – and attempt to consider farming and forestry within same policy framework;
- b) creation of new 'forest environment payments' and Natura 2000 payments;
- c) a more strategic response to rural development – though i) a 'strategy document setting out the EU priorities for the 3 policy axes, ii) national strategies which involve extensive consultation and indicator sets; iii) a system of standardised local and EU monitoring of measure effectiveness;
- d) reference to the multiplicity and confusing nature of many existing RDR measures;
- e) a suggestion of indicative planning for zones selected for forestry and agri/forest-environment measures (although there are some inconsistencies in the measures which would take place on 'areas selected as apt' as opposed to those which could take place more widely).

Q2. How could the draft regulation be more focused on EU environmental priorities?

See 1c) above. This Draft Regulation is just the first step. It promises an EU Rural Development Strategy – which will presumably make greater mention of the four priorities of the 6th Environment Action Programme (e.g. climate change amelioration, nature and biodiversity, environment & health, natural resources and water). More mention should be made too of Cross-Compliance and GAEC conditions in the First Pillar.

Q3. Do the proposals adequately integrate forestry with the wider environmental and sustainable development objectives?

Yes, it is a significant improvement.

Q3a. Can you support your view?

It includes mention of potential improvement of infrastructures serving forests, of improving the production of existing forests, of improving their forest-

environmental values, of specific support to Natura 2000 sites (1/3 of which are woodlands), of establishment of forests on agricultural and non-agricultural land, AND VERY IMPORTANTLY of the establishment of agroforestry (Article 41). This latter reflects for the first time the mention of conservation of 'threatened silvoarable systems' and 'agri-forestry' in the version of the 1999 EU Forest Strategy produced by the Commission. HOWEVER this grant should include 'maintenance costs' in addition to 'establishment costs'. We agree that it is not appropriate to include an income substitution component if SPF is payable (tho' this is very uncertain at the present date - Nov 2004).

Q4. Is the proposed EU strategy document an attractive proposal?

Yes

Q4a. Why?

This will be a difficult document to collate at the European level, but it does offer an opportunity for integration of RD with the policy documents mentioned above. Its key feature will be guidance on indicative planning, selection of common indicators and agreement on monitoring and evaluation methods. There is much scope for sharing of best practice between Member States, and particularly with new Cohesion States.

Q5. Should there be a requirement to produce national strategy documents?

The existing UK Rural Development Plans are useful documents: summarising existing environmental problems and explaining the items in the 1257/99 measures which are adopted. Presumably the 'national strategy document' would present much of this generic information, supplemented by clearer targets and indicator setting (somewhat like the national sustainable development targets). With only four 'regions/nations' the Common UK Strategy could be efficient – with a common core and 'regional' annexes.

Q5a. If so, how could this work in the UK with devolution and in other Member States where national governments have a limited role in regional decisions?

Sometimes there is too much duplication of effort by the 4 UK environment departments (e.g. 4 separate consultations on this document). There is much to be regained by working in joint committees where appropriate. There should be no problem with national 'chapters' in a joint UK Strategy or UK Monitoring Report. BUT the final RD Programme itself would remain 'regional' as indicated in Article 14.

Q6. Should there be a minimum percentage of funding allocated to each axis?

Yes.

Q6a. If so, what should the percentage allocations be, and why?

The minimum level in Article 71 is 20% and not 25% as suggested in your preamble. In the UK, Axis II would receive the major share but countries should be free to set their own priorities. The DEFRA preamble emphasises the English emphasis on agri-environmental payments, but Scotland spends a majority of its Axis II on LFA payments and has been unimaginative in its choice of development measures – setting a minimum of 50% for Axis II doesn't automatically create an increased spend on agri-environment.

Q7. Should the minimum percentage allocation for axis II (land management including agri-environment schemes) be higher?

Possibly

Q7a. If not, why not?

Axis II will be more important for the UK but other countries (who have greater allocations for RDR anyway – and some of which have no need for afforestation schemes) should be free to decide on the funding balance. 20% for each section seems a good balance (incidentally DEFRA's argument in para 66 contradicts that in para 42).

Q8. Is the approach and allocation of measures to strategic axis relevant and appropriate?

Yes.

Q8a. If not, what could be done to improve the proposal?

Measures are similar to the current RDR, but with some important additions, particularly in the area of forestry environment payments and agroforestry.

Q9. Should the draft regulation contain such a wide range of detailed measures rather than focusing on broader priorities to enable greater simplification and flexibility for programming?

Yes.

Q9a. If yes, are there any measures which should not be included, or added, to the regulation?

The suggested measures are adequate, and cover all likely needs. Countries and regions, depending on their Strategies and available budgets, can select an appropriate suite of measures (as with the current RDR). It is important that the measures defined at an EU level should be standard to allow monitoring and comparison.

Q9b. If no, what sort of broader priorities would be appropriate?

Broader priorities are less easily monitored & previous EU rural schemes have been notoriously inefficient for that reason.

Q10. How can the potential impact of axis I, in terms of unfair competitive advantage in some Member States, be limited?

Axis I deals with measures aimed at (i) improving human potential (vocational training, early retirement, advisory services etc); (ii) restructuring physical potential (modernisation of farms, improving economic value of forests; adding value to primary production, infrastructure improvements); and (iii) measures to improve the quality of agricultural products. All these are laudable aims, but there may be a tendency for aid to be focused unfairly on larger enterprises. This could be counteracted by an increased premium on groups of farmers/forest-owners operating together.

Q11. Should the LFA measure be linked to greater environmental/land management conditionality?

Possibly.

Q11a. If not, why?

The Single Farm Payment already assumes cross-compliance with 23 regulations and preservation of the land in 'good agricultural and environmental condition'. Agri-environment payments (e.g. Environmental Stewardship) are available as additional payments, and there will be further payments for Natura 2000 schemes. The whole concept of base-level, entry-level, mid-level and upper-level type agri-environmental payments is getting very complicated and (as said in the draft RDR) needs countries to clearly set objective and transparent criteria for payment AND monitoring.

Q12. Is the mainstreaming of LEADER into the Rural Development Regulation appropriate?

Yes.

Q12a. If so, are there any parts of the LEADER approach that should not be included?

Don't know enough about all LEADER schemes, but the concept of local supplements to reward community and inter-community or inter-region initiatives is welcome. It should also encourage greater understanding of LEADER opportunities amongst farming, forestry and civil-society groups (we don't think the UK has benefited nearly as much from LEADER as other countries?).

Q13. Should there be a minimum percentage of funding allocated to this axis?

Yes.

Q13a. Can you outline the reasoning to your response?

20-25% seems fine – more (of the UK's scarce) resources should be focused on Axis II.

Q14. Should a reserve be created for the best performing LEADER axes?

No.

Q14a. If so, where should it be funded from and what size should the fund be (the proposal is currently for 3%)?

This is proposed in the EU Document (3% in the final two years). Seems likely to be difficult to measure – and will involve comparing oranges and pears in different countries/regions.

Q15. Should part of the EAFRD be used to fund a national rural network?

Possibly.

Q15a. Can you support your response?

In the UK there are already many consultative fora, and it's not certain that another body is needed which pulls together 'all organisms and authorities involved in rural development'. There is a need for closer coordination between existing fora (e.g. regional forestry fora & farming fora), but it should be possible to use existing structures.

Q16. What criteria should be used as the basis for the allocation of funding?

EU finance to the current RDR in the UK is extremely low. Scotland has the lowest spend per ha of all European countries. It is based on historical spend in 94-99, which (according to the EU) was in turn based on low requests by the UK driven by the need to preserve the Fontainebleu rebate. DEFRA should acknowledge this and work harder to get both the Treasury and the Commission to agree to a payment based on current need rather than past parsimony.

Q17. Should funding be reserved for regions eligible for the Convergence objective?

Possibly.

Q17a. Why?

Not sure what Convergence regions are left in 2007-2013. Does anyone know? Perhaps Cornwall and West Wales still? South Yorkshire? Article 71 indicates that EU funding will be up to 85% in Cohesion Regions (as opposed to 50% elsewhere) and Article 70 indicates that 31.3 billion € of 88.75 billion € will be retained in Cohesion Regions (mainly Accession States). There are poor small farmers in Cohesion Regions and non-Cohesion Regions – it may be preferable to recommend countries to focus assistance on smaller farms/forest-owners.

Q18. Are the co-financing proposals, in particular the higher rates for Convergence regions appropriate?

Possibly not, see above – better to base assistance on low farm incomes rather than on regional economic averages.

Q19. Are there any areas of concern on the management, control and information section of the draft regulation?

No.

Q20. How can the monitoring and evaluation requirements be simplified, whilst allowing the Commission to still have effective monitoring over rural development programmes?

National implementations of earlier schemes like 'establishment of trees on farms' (2080/92) and even the current RDRs have often not been effective. In some countries, for example, there has been exceedingly poor maintenance of planted trees. Greater monitoring, reporting, and use of common indicators are welcomed.

Q21. Should modulation be specifically discussed in this regulation, and if so to what extent?

No.

Q21a. If so to what extent, or if not why?

Modulation is discussed in other EU Regulations. It rises only to 5% by 2010-2013, and countries get most (85%?) of this back to spend as they see fit on Pillar 2 measures.