



Llywodraeth Cymru
Welsh Government

Summary of Responses including Welsh Government Responses



Sustainable Farming and Our Land: Proposals to continue and simplify Agricultural Support for Farmers and the Rural Economy

November 2020

Contents

Executive Summary.....	2
Basic Payment Scheme	2
Rural Development	2
Additional points.....	3
1 Introduction	4
2 Basic Payment Scheme Proposals.....	5
2.1 BPS payment rates and annual allocation	5
2.2 Cross border single application rule (UK wide).....	5
2.3 Greening.....	6
2.4 Young Farmer Scheme	7
2.5 Late supporting documentation rules for BPS.....	8
2.6 National Reserve	8
2.7 Inspection rates.....	9
2.8 Over-declaration of land	10
2.9 BPS payment for un-validated claims	10
2.10 Active Farmer requirement	11
2.11 Hemp.....	12
3 Rural Development Proposals.....	13
3.1 Principles, mission, objectives and priorities.....	13
3.2 Measures.....	13
3.3 Governance and Administrative arrangements.....	14
3.4 European networking.....	14
3.5 Monitoring & evaluation and reporting.....	15
4. Welsh Language	16
Annex 1: List of Respondents.....	17
Annex 2: Outline summary of responses	19

Executive Summary

This report summarises responses to the ‘Sustainable Farming and our Land: Proposals to continue and simplify Agricultural Support for Farmers and the Rural Economy’ consultation. It sets out the views and perspectives offered by respondents and Welsh Government response.

In total, 99 responses were received over the course of the consultation. 52 responses were received on behalf of organisations and 47 responses from individuals.

Basic Payment Scheme

Of the eleven BPS proposals consulted upon, respondents were in broad agreement with eight. Three generated a high level of contrasting views (either in volume of negative response or associated commentary)

- Young Farmers Scheme (Question 7)
- National Reserve (Question 11)
- Hemp (Question 17)

The detail and Welsh Government response to the BPS proposals is set out in section 2 of this document, which we are minded will form the basis for amending retained EU Law before the end of this calendar year.

Rural Development

Respondents were in broad agreement with the five Rural Development proposals consulted on.

There was a mixed response to the following proposals, although with the majority of respondents in favour:

- Replacing the European Union mission, objectives and priorities for rural development support with Welsh specific definitions for rural development (question 18).
- Administrative arrangements - removing the detailed requirements on the content and amendment of a future rural development programme (question 21) and strengthening the role of the Managing Authority in the administration of the RDP (question 22).

The detail and Welsh Government response to the Rural Development proposals is set out in section 3 of this document, which we are minded will form the basis for amending retained EU Law early next year.

Additional points

The consultation also provided respondents with the opportunity to highlight any related issues which had not been specifically addressed in the consultation document.

We received a number of individual and organisational responses putting forward additional suggestions to the proposals in the consultation, these will be shared with relevant policy teams and used to inform future policy development with respect to agricultural support in Wales.

1 Introduction

This report provides a summary of responses to the ‘*Sustainable Farming and our Land: Proposals to continue and simplify Agricultural Support for Farmers and the Rural Economy*’ consultation. It sets out the views and perspectives offered by respondents with regard to the proposals and provides Welsh Government responses.

1.1 Background

On the 31 January 2020 the United Kingdom (UK) left the European Union (EU) and entered the Implementation Period governed by the European Union (Withdrawal Agreement) Act 2020. The Implementation Period is due to end on the 31 December 2020.

To continue to support Welsh farmers and the wider rural economy until new agricultural support schemes, designed around the Sustainable Land Management principles, the Welsh Government proposed to continue with the existing Common Agricultural Policy (“CAP”) regulatory framework, making some simplifications and integrating it with Wales’ unique legislative framework, specifically the Environment (Wales) Act 2016 and the Well-being of Future Generations (Wales) Act 2015.

The UK Agriculture Bill is expected to afford Welsh Ministers the powers to make changes to retained direct EU legislation.

Schedule 5 to the Bill includes limited powers for the Welsh Ministers to amend and extend retained direct EU legislation to streamline the administration of the scheme or make its operation more efficient or effective; remove provisions which are spent or have no practical utility; remove or reduce burdens on persons applying for direct payments; ensure sanctions applied are appropriate and proportionate and to limit the application of the scheme to Wales.

Schedule 5 also includes broad powers for the Welsh Ministers to modify legislation which relates to support for rural development.

The proposals in the consultation set out a number of small but impactful changes to the scheme and programme requirements, which retain the main elements of the current regulatory framework, and deliver the Welsh Government’s policy that high food safety, animal welfare and environmental standards must be maintained.

The proposed changes will only apply to the new domestic BPS and RDP, which will commence from scheme year 2021, subject to replacement funding being made available by UK Government.

1.2 Responses

A full list of responses to the consultation, is provided in Annex 1.

2 Basic Payment Scheme Proposals

2.1 BPS payment rates and annual allocation

Q1. Do you agree with the proposal for Welsh Ministers to set the BPS ceiling, in regards to Wales?

Q2. Do you agree with the proposal to introduce additional measures allowing the Welsh Government greater flexibility to control any unspent BPS budget?

The majority of respondents agreed with these proposals. Those opposed were keen the budget provided remained focussed on agricultural support, with mixed views on whether any unspent monies should be used to top up BPS or fund rural development activity.

WG response

The Welsh Ministers are minded to determine a total direct payment ceiling for Wales annually before the start of each year. The ceiling will then be published as soon as is practicable.

This total ceiling will take account of claimed BPS entitlements, the National Reserve, the Redistributive Payment, the Young Farmer Scheme and any Voluntary Coupled Support Scheme (N.B. there are no current plans to introduce a coupled scheme in Wales).

The Welsh Ministers are minded to use a new method for calculating BPS entitlement values will take account of the total ceiling and number of entitlements claimed each year, which together with simplified rules for applying administrative penalties will ensure the entirety of the budget allocated to BPS is able to be spent.

2.2 Cross border single application rule (UK wide)

Q3. Do you agree with the proposal to remove cross-border applications and only consider Welsh land for BPS claims in Wales, removing the need to wait for checks from other paying agencies?

Q4. Do you agree with the proposal for minimum claim size to remain unchanged and not to make any provision for farmers who currently rely on land in another part of the UK to achieve the minimum claim size area of 5 eligible hectares?

There was clear majority in support of moving away from the current cross border single UK claim. Some responses noted the proposals are consistent with the plans of the other administrations. Others noted the change was required to allow the respective transition to new agricultural support schemes to proceed at different timescales.

There was less support for only taking account of land in Wales when assessing the 5 hectare minimum claim size rule. Many responses considered it would be disproportionate to exclude a handful (records indicate 21 claims were in this

category in 2020) of cross-border claims and suggested a way should be found for these claims to remain eligible for BPS payments in Wales.

WG response

The Welsh Ministers are minded to remove cross-border applications from the BPS scheme in Wales.

Provision will however be made to ensure farmers with land in other parts of the UK can continue to rely on land declared in another UK administration for claim year 2020, to be eligible in the calculation of the 5 hectare minimum claim size for BPS for claim year 2021 onwards.

2.3 Greening

Q5. Do you agree with the proposal to retain the environmental benefits of Greening practices through Cross-Compliance?

Q6. Do you agree with the proposal to remove the Crop Diversification rule from the Greening requirements?

There was clear majority in support of these proposals.

Those supporting the removal of crop diversification requirements highlighted there is a lower risk of monoculture farming in Wales, compared to elsewhere and suggested the burden of administration outweighed any potential benefits. Those opposed were concerned with the potential impact removing this requirement would have on ecological systems and suggested crop diversity could enhance food security.

There was a request for a decision on this to be announced early, so arable farmers in Wales could review their 2021 cropping plans.

There was a larger majority in support of the proposal to retain environmental benefits for Greening through cross-compliance. Some comments included suggestions cross-compliance standards should mirror those of the EU to avoid a weakening of environmental and welfare standards and highlighting the need to reduce bureaucracy.

It was considered the Ecological Focus Areas typically declared by farmers in Wales were sufficiently protected under the Good Agricultural and Environmental Condition (GAEC7) of cross-compliance. Protecting Environmentally Sensitive Permanent Grassland in cross-compliance would reduce the administrative burden to farmers.

The majority of comments agreed greening practices had failed to deliver the environmental benefits to the extent they were originally envisaged.

WG response

Improving environmental practices and standards is a top priority for the Welsh Government, and will form a fundamental part of the Agriculture (Wales) Bill in the next Senedd term.

After review of the responses and feedback, the Welsh Ministers are minded to take forward the proposals as set out in the consultation.

The crop diversification requirement of Greening will be removed. Ecological Focus Areas most often declared (hedgerows and stone walls) will continue to be protected through unchanged cross-compliance landscape features conditions. A new condition will be added to GAEC 7 to protect Environmentally Sensitive Permanent Grassland, to ensure it cannot be ploughed or converted without the consent of Natural Resources Wales.

The separate Greening payment will cease, and the 30% Greening budget will no longer be deducted from the total ceiling. This means the Greening budget will be available to farmers in Wales through the BPS ceiling. This will increase the value of all BPS entitlements and ensure the amount of direct payments farmers in Wales were entitled to, prior to the Greening changes, does not decrease.

2.4 Young Farmer Scheme

Q7. Do you believe we should close this scheme to new applicants from 2021?

Q8. Other than the option to close the Young Farmers Scheme to new applications from 2021, are there further options which could be considered?

Of the responses received, a clear majority of respondents disagreed with this proposal (44 responses). 30 respondents agreed and 10 respondents did not provide a clear response.

The respondents who disagreed with the proposal highlighted the importance of securing new entrants into the sector and the barriers facing young people from entering the sector. They highlighted high entry cost for those who are not already part of a farming family, land prices being divorced from the likely annual return from farming activities and concerns closing it without any alternatives would mean no scheme was available through this period of transition.

There were a number of suggestions to redesign this scheme or suggestions for the design of future schemes.

WG response

Whilst there was clear majority who disagreed it is noted many responses agreed the scheme offers limited value.

Taking into account the strength of consultation responses and considering it is important to maintain support for young farmers, the Welsh Ministers are minded that no changes be made to the BPS Young Farmer Scheme, which will continue to accept applications from 2021.

The scheme will be included in any review undertaken to transition from BPS to the new agricultural support schemes designed around sustainable land management.

The suggestions provided to improve and/or redesigning support for young farmers will be considered by the relevant policy teams.

2.5 Late supporting documentation rules for BPS

Q9. Do you agree with the proposal to extend the BPS supporting document submission date to 31 December?

Q10. Do you agree with the proposal to keep the application deadline and late claim penalties unchanged?

The vast majority of respondents agreed with these proposals.

Those opposed to extending the late supporting document deadline were concerned with the potential for confusion by having different dates for the submission of the Single Application Form (SAF) and the risk of applicants forgetting to submit their supporting documents at all. Suggestions made to resolve this include a new 14 day warning system to provide an opportunity for claimants to provide the documentation and rectify the position as necessary. Other comments indicated the importance of communicating this change in procedure to all applicants.

Feedback on the proposal to keep all other deadlines and penalties unchanged was overwhelmingly positive, although the minority who oppose did suggest the penalties for late submission should be removed entirely.

WG response

Following a review of the responses the Welsh Ministers are minded that these proposals be taken forward as set out in the consultation.

The deadline for late supporting documents will be extended to the 31 December of the claim year with no change to the SAF deadline or late claim submission penalties.

Reminders will be issued through RPW online to highlight when supporting documentation has not been submitted, including when the absence of supporting documentation prevents payment being made.

2.6 National Reserve

Q11. Do you agree with expanding the National Reserve categories to include additional land acquired?

Q12. Are there any other categories or proposals which you believe should be taken into consideration for the National Reserve?

There was support for the proposal to introduce a category for farmers and land managers who have bought land or entered into a long-term lease of 5 or more years since 2015 to be eligible under the National Reserve (52 in favour and 14 against) however many responses were caveated or the views within organisations finely balanced.

A number raised concerns around the potential impact on market value of agricultural land and current trading of BPS entitlements. Others suggested the

proposal should have a retrospective outlook, whilst some suggested it should also apply to land acquired from 2021.

Other responses suggested the number of entitlements should be capped for the new category or priority in this category should also be given to young entrants and new farmers. It was also suggested care should be given to ensure the proposal doesn't lead to a reduction of smaller holdings by the expansion of large farms.

There were a number of other suggestions including additional categories and requests to review the period when entitlements can be traded.

WG response

Whilst a majority of responses supported the introduction of a land acquired category the responses also indicate there is no consensus as to how the new category should be delivered.

In light of the range of comments received, the Welsh Ministers are minded that no new categories be added to National Reserve for 2021. Applications from 'New Entrants' and 'Young Farmers' will continue to be prioritised.

The BPS entitlement trading window will be extended from 30 April and remain open all year round. Transfer and Lease forms submitted by midnight on 15 May each year will be processed and providing they are approved, allow the BPS entitlements included to be activated by the recipient in the same year.

The 2-year usage rule, which requires entitlements to be activated at least once in any two year period will continue to apply in Wales, and be used to replenish the National Reserve.

2.7 Inspection rates

Q13. Do you agree with this proposed reduction in BPS inspection rates?

The vast majority of feedback supported this proposal.

Comments provided sought assurance there would be no negative impact on welfare and the environment or diminish the effectiveness of checks. Some suggested the penalty matrix should be reviewed to provide proportionate penalties.

There was also encouragement to extend the use of new technologies including remote sensing as being a positive step providing these delivered appropriate levels of assurance.

WG response

The Welsh Ministers are minded that a 3% sample of the combined BPS, Young Farmer scheme and Redistributive Payment scheme populations will be used. The error rate will continue to be monitored and Welsh Ministers will decide annually whether the minimum inspection rate should increase, decrease or remain unchanged, taking into consideration the level of compliance.

Inspection cases selected as part of the Welsh Government Rural Communities – Rural Development Programme 2014-2020 (land based schemes) will additionally contribute towards the overall BPS control rates, where appropriate.

2.8 Over-declaration of land

Q14. Do you agree with the proposal to remove the “yellow card” restriction?

The vast majority of responses were in favour of this proposal.

Some respondents were concerned reducing the penalty levels removed the disincentive effect considering the current penalty accurately reflects the seriousness of the offence. Other responses were concerned removing the 50% penalty reduction (if the difference found is within 10%) would be disproportionate and there were calls to reconsider if the minimum threshold for any penalty should continue as 2ha or 3%, given the potential for larger farms to be disadvantaged.

WG response

The Welsh Ministers are minded to take forward the proposals as set out in the consultation.

A flat rate 1.5% reduction will be applied where more than 2 hectares or 3% of land is found to be over-declared, in every year, from 2021. The penalty will continue to be reduced by 50%, where the difference is less than 10% of the determined area.

As a result the ‘brought forward penalty’ provision, where penalties are off-set against subsequent years’ claims (for a maximum of 3 years) will also no longer be required and will be omitted.

2.9 BPS payment for un-validated claims

Q15. Do you agree with the proposal to introduce an advance and balance payment model and the removal the requirement for claims to be fully validated before an early advance payment?

The majority of respondents agreed with these proposals.

Several responses were concerned with balance payments being paid to farmers in February, suggesting the current timings should be retained with full payment made from December. Others responses were concerned the default percentage of 70% was too low and should be increased especially in the cases where queries meant 30% of their payment could be delayed after February. It was also suggested the change could require some farmers to re-arrange their business and/or loan payments around the revised payment model.

Those in favour suggested the proposal helped to remove “artificially created deadlines” and should remedy situations where some claims were delayed due to validation check and be beneficial to farmers’ cash flows.

WG response

The Welsh Ministers are minded to introduce an automatic BPS advance payment.

A 70% advance payment will be made to all BPS claims in October. The balance will be paid within the payment window, subject to validation checks being completed and administrative timescales. The payment window will remain unchanged, 1 December to 30 June.

Any overpayment of the advance payment, will be offset against the balance payment, or recovered under the established debt recovery procedures (if required).

No advance payment will be made to claims considered to be ineligible, including those, where supporting documentation has not been submitted.

2.10 Active Farmer requirement

Q16. Do you agree with the proposal to remove the active farmer negative list requirements and retain the minimum levels of 'agricultural activity'?

The vast majority of responses supported the removal of the negative list requirements of the Active Farmer test and retention of the minimum level of agricultural activity checks.

One respondent suggested the approach would be consistent with a desire to break down the barriers between forestry, farming and ecological land management and open the support to all who want to manage land for a blend of public goods and this approach goes further than other UK administrations to ensure agricultural activity is taking place.

There was acknowledgement the current 21 hectare requalification criteria provides little by way of disincentive and there were calls for more to be done to ensure only genuine farmers accessed this or future schemes.

WG response

The Welsh Ministers are minded that the active farmer "negative list" be removed but checks continue to be undertaken to ensure the minimum level of agricultural activity is being delivered.

This means any claimants who operate airports, railways, waterworks, real estate services or sports and recreational grounds will no longer be required to requalify.

Changes will not affect claims submitted under the Welsh Government Rural Communities - Rural Development Programme 2014-2020 Glastir Organic scheme for scheme year 2021.

Farmers will need to continue to meet the definition of a farmer, which means producing, rearing or growing of agricultural products; maintaining an agricultural area in a state which makes it suitable for grazing or cultivation or carrying out a minimum activity on agricultural areas naturally kept in a state suitable for grazing or cultivation.

2.11 Hemp

Q17. Do you agree with the proposal to remove land used for the cultivation & production of hemp from the list of eligible crop codes and no longer be eligible for BPS?

The consultation responses to this proposal were evenly split.

Responses suggested hemp has potential to become a viable alternative crop able to be grown across Wales with a number of uses including being used for clothing, products and medicine and recommended the crop should remain eligible. Others indicated the crop has good environmental credentials with deep roots which is good for soil structure and could help future crop diversity in Wales.

WG response

The responses to the consultation suggests there is sufficient potential for hemp to be grown throughout Wales and be part of the wider green recovery. On this basis, the Welsh Ministers are minded that it should continue to be eligible for activating BPS entitlements, subject to satisfying the existing Home Office rules and guidelines around THC content and seed varieties.

3 Rural Development Proposals

3.1 Principles, mission, objectives and priorities

Q18. Do you agree with replacing the European Union mission, objectives and priorities for rural development support with Welsh specific definitions for rural development?

The vast majority of respondents agreed with this proposal. Concerns were raised about replacing the current EU mission, objectives and priorities with a narrow definition of rural development. There was strong support for simplifying the legislation.

WG response

The Welsh Ministers are minded to retain the current mission, objectives and priorities. Wales' bespoke legislation namely, the Well-being of Future Generations (Wales) Act 2015 and Environment (Wales) Act 2016 will be incorporated to retain the current scope of Rural Development support structures, which complement Wales' ambitions.

The Welsh Ministers are minded that the EU focus areas will be omitted from legislation with a view to developing non-statutory focus areas through programme documentation.

3.2 Measures

Q19: Do you agree with the proposed amendments of the Measures?

Q20: Are there any further amendments or options you would like to suggest for any Measure?

The majority of respondents clearly agreed with this proposal. Some respondents wanted to make further amendments to the Measures compared to those put forward in the consultation, including taking the opportunity to expand into all aspects of forestry and woodland management. Other responses highlighted the importance of having a financial framework in place in which the Measures will operate and the importance of ensuring a level playing field with the rest of the UK.

A large number of respondents (54) put forward further suggestions to amend specific Measures, either to generally amend the Measures or to create new ones.

WG response

The Welsh Ministers are minded to retain the current Measures as this will provide the Welsh Ministers with maximum flexibility to support the rural economy during the transition to new support schemes following the end of the Implementation Period and recovery from the effects of the COVID-19 pandemic.

The suggestions to adjust measures will be considered as part of developing new agricultural support schemes, including any scheme design adjustments which are

agreed when specific schemes are no longer delivered through the EU programme. Major changes to the Measures or creation of new Measures will be reserved for further consultation at a later date.

3.3 Governance and Administrative arrangements

Q21. Do you agree with removing detailed requirements for the content and amendment of a future rural development programme?

Q22. Do you agree with strengthening the Managing Authority's role?

There was a mixed response to these proposals although a majority supported the proposals.

Concerns were raised about a potential loss of transparency and accountability, emphasising the importance of the Welsh Government sharing data and reporting on performance against targets and plans. Respondents also emphasised the importance of stakeholder engagement including mirroring EU arrangements, if not the prescriptive bureaucracy.

In terms of the Managing Authority's role, some respondents were unclear on what was being proposed. Some recommended benchmarking on a UK level would be beneficial, others favoured maintaining the current system as it has built-in checks and balances, including the Programme Managing Committee (PMC).

WG response

The Welsh Ministers are minded that the Welsh Government will establish a Rural Development Advisory Board to advise on the content and delivery of the domestic rural development programme on a non-statutory basis.

New programme documentation will be developed through a collaborative approach and the board's opinion considered in decision-making processes.

The role of the Managing Authority will be retained to oversee and support the rural development monitoring board, provide advice to the Welsh Ministers and oversee delivery of the programme.

3.4 European networking

Q23. Do you agree with removing regulatory requirements relating to networking?

The majority of respondents clearly agreed with this proposal.

A sizeable minority, 22 respondents, disagreed highlighting the importance of networking and sharing ideas and best practice to innovation and research and development. Some respondents were concerned the absence of a statutory requirement to network would lead to de-prioritisation due to funding shortages.

WG response

The Welsh Ministers are minded to remove the regulatory requirements relating to networking. The Welsh Government agrees networking, sharing best practice and ideas on rural development will continue to be important in the future and is committed to providing opportunities to continue to do this on a non-statutory basis.

Networking is a crucial part of the ways of working the Welsh Government and other public bodies in Wales are subject to, under the Well-being of Future Generations Act.

The Welsh Government also recognises the importance of maintaining an outward-looking perspective after leaving the EU and providing and participating in networking opportunities with other countries and regions as well as within Wales.

3.5 Monitoring & evaluation and reporting

Q24 Do you agree with integration and enhancement of monitoring and evaluation of support for rural development, using Welsh-specific objectives and indicators?

Q25. Do you agree the Welsh Government should report annually on the implementation of its rural development programme?

A significant majority of respondents clearly agreed with these proposals.

Some responses did not want any changes to the monitoring, evaluation and reporting of rural development support above those needed following the end of the Implementation Period. Others called for monitoring, evaluation and reporting to be carried out independently of the Welsh Government and for the role of the Programme Managing Committee (PMC) to be strengthened.

Some raised concerns about the new Welsh-specific objectives and indicators and emphasised the importance of ensuring economic, environmental, social and cultural aspects are included to ensure a balance is achieved between farming, forestry and wider rural economy interests.

WG response

A majority of respondents agreed with these proposals. On this basis the Welsh Ministers are minded that the Welsh Government ensure there is a robust process in place for monitoring and evaluating the programme which, in the short-term, will closely follow current arrangements.

The Welsh Ministers are minded in the longer term, working in collaboration with the Rural Development Advisory Board, Wales-specific objectives and indicators will be produced and consulted on.

The Welsh Government will continue to report annually on rural development support, on a non-statutory basis as agreed through the Rural Development Advisory Board.

4. Welsh Language

We saw a general consensus in the responses received that these proposals have a neutral effect on the Welsh language.

Some concerns were raised on the proposal to replace the current mission, objectives and priorities for the Rural Development Programme with a definition specific to Wales (question 18) was too narrow and the retention of current principles and objectives relating to jobs and communities would better support the Welsh language than the proposed definition.

Comments made reflect broad support for the scheme to be delivered bilingually and neither Welsh nor English speakers should be disadvantaged by the proposals.

Specific comments stated bilingual tourism documents (flyers and brochures) could be confusing to non-Welsh speakers. Another comment suggested enhancing rural development should strengthen rural communities and thus increase opportunities for people to use the Welsh language.

The proposals set out in this consultation mark the beginning of the transition to new agricultural support arrangements. The proposals adopted will support farmers, land managers and the wider rural economy to remain on their land, with funding available from the Welsh Government to support resilience in the wider rural community and the continuance of the Welsh language in these areas.

Welsh Government will continue to deliver the BPS and RDP bilingually.

Annex 1: List of Respondents

National Parks Wales

Calon Cymru Network

Dyfed Archaeology

Coed Cadw

Clwyd-Powys Archaeological Trust

MWMAC

Wales Flood and Coastal Erosion Committee

Community Development Service – Conwy CBC

Farmers Union of Wales

Social Farms & Gardens

Agricultural Law Association

Arwain Group – Powys CC

Central Association of Agricultural Valuers

Coed Lleol Woods Association

Confederation of Forest industries

County Land and Business Association

Campaign for the Protection of Rural Wales

Cynnal y Cardi Caredigion Local Action Group

Game & Wildlife Conservation Trust Cymru

Glamorgan Gwent Archaeological Trust

Growing Mid-Wales Partnership

Gwynnedd CC

Hybu Cig Cymru

Isle of Anglesey CC

Landworkers Alliance

National Trust Cymru

Natural Resources Wales

National Farmers Union (Wales)

NSA Cymru

Royal Town Planning Institute Cymru

RSPB Cymru
RSPCA Cymru
Tenant Farmers Association
The Vegan Society
Wales Environment Link
Wales Green Party
Wales Young Farmers Club
Wesh Language Commissioner
Welsh Local Government Association
Wildlife Trust Wales
Glyn-coch Farm
Gwynedd CC
Pontypool Park Estate
Welsh Water
Bryncrug YFC
European Industrial Hemp Association
Glamorgan YFC
Gwernol Agri Services Ltd
Montgomery YFC
Wales and Radnor YFC
W.S.Jones & Son

Annex 2: Outline summary of responses

Consultation area	Question:	Clear agree with proposal	Clear Disagree with proposal	Unclear	Skipped	Total
BPS payment rates & annual allocation	Q1. Do you agree with the proposal for Welsh Ministers to set the BPS ceiling, in regards to Wales?	72	7	5	15	99
	Q2. Do you agree with the proposal to introduce additional measures allowing the Welsh Government greater flexibility to control any unspent BPS budget?	65	10	10	14	99
Cross border single app rule	Q3. Do you agree with the proposal to remove cross border applications and only consider Welsh land for BPS claims in Wales, removing the need to wait for checks from other paying agencies?	63	10	10	16	99
	Q4. Do you agree with the proposal for minimum claim size to remain unchanged and not to make any provision for farmers who currently rely on land in another parts of the UK to achieve the minimum claim size area of 5 eligible hectares?	51	19	13	16	99
Greening	Q5. Do you agree with the proposal to maintain greening practices through cross compliance?	66	9	12	12	99
	Q6. Do you agree with the proposal to remove the Crop Diversification rule from the Greening requirements?	56	16	10	17	99
YFS	Q7. Do you believe we should close the Young Farmers Scheme to new applications from 2021?	30	44	10	15	99
	Q8. Other than the option to close the Young Farmers Scheme to new applications from 2021, are there further options which could be considered?	47	11	23	18	99
Late supporting docs	Q9. Do you agree with the proposal to extend the BPS supporting document submission date to 31 December?	60	12	12	15	99
	Q10. Do you agree with the proposal to keep the SAF deadline and late claim penalties unchanged?	62	7	14	16	99
National reserve	Q11. Do you agree with expanding the national reserve categories to include additional land acquired?	52	14	15	18	99
	Q12. Are there any other categories or proposals which you believe should be taken into consideration for National Reserve?	38	9	26	26	99
Inspection rates	Q13. Do you agree with this proposed reduction in BPS inspection rates?	58	22	4	15	99
Over-declaration of land	Q14. Do you agree with the proposal to remove the "yellow card" restriction?	49	6	23	21	99
BPS payment for unvalidated claims	Q15. Do you agree with the proposal to introduce an advance and balance payment model and the removal the requirement for claims to be fully validated before an early advance payment?	54	13	15	17	99
Active Farmer	Q16. Do you agree with the proposal to remove the active farmer negative list requirement and retain the minimum levels of 'agricultural activity'?	50	20	14	15	99
Hemp	Q17. Do you agree with the proposal to remove land used for the cultivation & production of hemp from the list of eligible crop codes and no longer be eligible for BPS?	24	35	23	17	99
Mission, objectives & priorities	Q18. Do you agree with replacing the European Union mission, objectives and priorities for rural development support with Welsh specific definitions for rural development?	62	14	14	9	99
Measures	Q19: Do you agree with the proposed amendments of the Measures?	62	8	15	14	99
	Q20: Are there any further amendments or simplifications you would like to suggest for any Measure?	17	7	50	25	99
Admin arrangements	Q21. Do you agree with removing detailed regulations setting out requirements for the content and amendment of a future rural development programme?	44	19	14	22	99
	Q22. Do you agree with strengthening the Managing Authority's role?	44	19	17	19	99
European Networking	Q23. Do you agree with removing regulatory requirements relating to networking?	40	22	19	18	99
Monitoring & Evaluation and reporting	Q24 Do you agree with integration and enhancement of monitoring and evaluation of support for rural development, using Welsh-specific objectives and indicators?	65	5	10	19	99
	Q25. Do you agree the Welsh Government should report annually on the implementation of its rural development programme?	76	0	8	15	99