

# **Farmers' Union of Wales response to the Welsh Government's *Sustainable Farming and Our Land: Proposals to continue and simplify Agricultural Support for Farmers and the Rural Economy* consultation**

October 2020

## **Summary**

The Farmers' Union of Wales (FUW) was established in 1955 to exclusively represent the interests of farmers in Wales, and since 1978 has been formally recognised by the UK Government, and subsequently by the Welsh Government, as independently representing those interests.

The FUW's Vision is thriving, sustainable, family farms in Wales, while the Mission of the Union is To advance and protect Wales' family farms, both nationally and individually, in order to fulfil the Union's vision.

The below response reflects the views of the FUW membership as established through consultation with the union's twelve County Executive Committees and central Standing Committees.

In terms of the *Basic Payment Proposals* set out in the consultation, whilst the FUW welcomes many of these as a means by which to simplify, streamline and make the Basic Payment Scheme (BPS) more proportionate, members were concerned that a number of the proposals did not go far enough, while others would undermine certain categories of farmers.

In terms of the *Domestic Rural Development Proposals*, members were concerned that the proposals would significantly dilute the long standing principles relating to role of Rural Development in supporting agriculture and food production - principles which have their roots in those established under Clement Attlee's post war Government and those enshrined in the Treaty of Rome.

Members noted that RDP schemes are inherently and almost by definition more complicated than Pillar 1 schemes, hence the consistent problems experienced in relation to producing and processing relatively modest numbers of Glastir contracts and payments compared with Welsh administrations excellent track record overall in delivering the Single Payment and Basic Payment Schemes.

As such, and given that the proposals pave the way for the introduction of the proposed Sustainable Farming Scheme under a domestic RDP while phasing out direct Pillar 1 type support, members believed that the *Simplifying agricultural support* title of the consultation document was misleading, given that what is proposed will make the administration and delivery of agricultural support, and the rules associated with schemes, very much more complex than is presently the case.

## **BPS Proposals**

### **1. BPS payment rates and annual allocation**

#### **Proposal:**

The Welsh Government proposes to set the Welsh BPS ceiling annually, and provide flexibility for Welsh Ministers to allocate any remaining funding allocated to BPS

*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 allow the Welsh Ministers flexibility to control any unspent funding allocated to BPS?*

#### **FUW Response**

The FUW shares the Welsh Government's concerns regarding the need for the UK Government to provide assurances regarding Wales' allocation of funding for agriculture and rural developments, and like the Welsh Government believes that funding levels should be at at least the levels they would have been had the UK remained within the EU - in line with the commitment made by those now in power who lobbied for the UK to leave the EU.

The FUW understands the need to allow the Welsh Government to set the Welsh BPS ceiling annually and to reallocate any unspent funding allocated to the BPS, but believes that a commitment should be given that such powers will not be used to reduce the BPS budget as a percentage of Wales' funding allocation and that unspent funds allocated to the BPS will not be diverted away from agriculture and active farmers, including young and new entrants.

As such, members were concerned that the proposal to allow Welsh Ministers to set the Wales' BPS ceiling was too open-ended and vague, and could be used to transfer significant funds away from the BPS, thereby causing significant damage to farm businesses and individuals involved in agricultural supply chains - flexibility

which would stand in stark contrast to the rigid long term financial framework that was in place under EU Common Agricultural Policy financial frameworks.

Members therefore emphasised that the BPS budget should be ring fenced until a replacement scheme was made available, and that such a replacement scheme should include a safety net payment which reflects volatility in agricultural markets and the need to support family farms, agricultural communities and food production, as previously argued for by the FUW in response to previous consultations.

## **2. Cross border single application rule (UK wide)**

### **Proposal:**

It is proposed to only take Welsh land into account for calculating BPS claims in Wales. As a result, payments will be made as soon as checks in Wales are completed. Administrative penalties discovered on land located in other UK administrations will not be applied to Welsh claims. However, where less than 5 hectares of Welsh eligible land is available, the Welsh claim would be considered ineligible and rejected under the minimum claim size rules.

*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?*

### **FUW Response**

Members supported the proposal to consider the Welsh part of cross-border BPS claims as 'standalone' claims such that the payments deriving from Rural Payments Wales could be released to such claimants at the same time as all other Welsh payments without the need to wait for checks to be made by other paying agencies.

However, members did not believe it would be acceptable to discriminate against those with less than 5 hectares in Wales but who farm more than 5 hectares in total, given that this would mean a loss of hundreds of pounds for those businesses.

It is understood that there are just twenty-one farms that currently fall into this category, and given this low number it was felt that finding a means by which to

avoid discriminating against such individuals would not be difficult; for example, such businesses might remain subject to the current rules in terms of having to wait for cross checks by other paying agencies; or payments could be issued based on other evidence or on historical evidence such as the previous year's total figures for all land in the UK.

### **3. Greening**

#### **Proposal:**

Welsh Government proposes maintaining existing environmental standards and practices, retaining any environmental benefits of the Greening processes, but removing some of the existing complexities by moving retained requirements, which are undertaken by around 3% of claimants who do not automatically qualify by virtue of their permanent grassland, into cross-compliance.

By delivering annual monitoring of land use changes and protecting Permanent Grassland and EFA requirements through cross-compliance, the aim is simply to minimise more complex requirements which do not result in additional environmental benefits. They do, however, propose to remove Crop Diversification element of Greening. The 30% budget currently provided for Greening will no longer be required as the Permanent Grassland and EFA requirements will be delivered under the Cross Compliance system. Welsh farmers would not be financially disadvantaged as a result of this proposal as there are no planned reductions to the amount of direct payment received as a result of the restructure.

*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?*

#### **FUW Response**

The FUW supports the proposal to do away with the Crop Diversification rule which has created significant additional bureaucracy and problems for farms in Wales and the Welsh Government, despite the rule being aimed at tackling problems which existed in other parts of the European Union and not in Wales.

In terms of the incorporation of Environmental Focus Area (EFA) requirements in the Cross Compliance rules, it is believed that the benefits provided by EFAs since their introduction should be assessed in order to determine whether they should be continued.

Notwithstanding this, if EFA requirements are to be incorporated in Cross Compliance rules, this should be done in such a way as to minimise bureaucracy and complexity while ensuring that people are not penalised for inadvertent breaches of the rules.

#### **4. Young Farmer Scheme**

##### **Proposal:**

One option would be to close the Young Farmer scheme to new applications from BPS 2021 onwards. Young farmers already eligible for the scheme will continue to receive any remaining top up payments, with those who applied in 2017 due to receive their final payment in 2021, and those who applied and were eligible in 2020 retaining the annual top up payments until 2024.

Closing the scheme to new applications after BPS 2020 reduces administrative burdens and ensures that this does not become a “legacy scheme” which would continue into future Sustainable Farming programmes. The closure of the scheme would also lead to a small increase to all BPS entitlements which is of benefit to a larger applicant pool. Young Farmers would continue to be a priority category eligible to apply for BPS Entitlements from the National Reserve.

*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?*

##### **FUW Response**

The FUW supports the retention of the Young Farmers Scheme but believes it should be improved to ensure it better delivers funding to businesses in which young farmers are involved and where such funding is needed, and at sufficient levels which make a difference to the business.

In this context, it is important to note that if the Greening element of the BPS is incorporated into entitlement values, the circa £400 currently provided annually to those eligible (not an insignificant amount of money) will increase.

The FUW believes that the increase in the value of BPS payments received by non YFS participants - estimated to be around £30 - is so insignificant that this cannot be used to justify such a decision.

The FUW does not believe that support for the retention and improvement of the YFS should preclude the development of a scheme or schemes aimed at providing more significant help for young farmers and new entrants through different avenues.

However, the abolition of the YFS in the short term is likely to lead to a hiatus during which the only additional support for young farmers will be through the National Reserve - and most would not be eligible for this, representing a backwards step in terms of there being recognition of the need to support young farmers.

The FUW notes the distinct differences between the Young Farmer Scheme and the previous YES Scheme, in that the former provides a modest additional annual payment for businesses in which young farmers are involved, whereas the latter was a grant scheme for young farmers and new entrants which required significant planning and paperwork but rewarded successful applicants with an average grant of around £14,000.

Notwithstanding such differences, it is also notable that while the numbers taking part in the Young Farmer Scheme are relatively modest - around 970 in 2019 and some 600 in 2020 - this is far higher than the 366 young and new entrant farmers who benefited from the YES Scheme between its introduction in 2010 and April 2013.

Most members felt that the proposal showed a disappointing will to scrap a scheme that benefits around 1 in 20 Welsh farm businesses, albeit modestly, in order to reduce a very small volume of related paperwork to zero without replacing it with anything for young farmers.

Members therefore believed that the Welsh Government should assess why so few younger people benefit from the scheme and how it might be improved to better support those the scheme should be aimed at supporting - for example, should the eligibility criteria be improved to target businesses involving young farmers with turnovers below a certain level to better direct higher annual payments towards those with the greatest needs.

## **5. Late supporting documentation rules for BPS**

### **Proposal:**

Welsh Government proposes to increase flexibility for claimants by extending the deadline for submitting BPS supporting documents until midnight on 31 December of the relevant claim year. If the proposal to pay an advance is implemented (detailed

below, proposal 9), the absence of supporting documentation would prevent an advance payment being made, as this would be one of the basic eligibility checks.

Welsh Government propose no change to the rule requiring the application form to be submitted by 15 May, as it also covers ongoing RDP schemes operating under EU Law. They also propose no change to the late penalties (1% per working day) and eventual rejection if submitted after the final date of submission. Similarly no changes are proposed to the late claim amendment rules with amendments permitted to the application form without penalty until 30 May, followed by 1% per working day until the final date of submission.

*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?*

### **FUW Response**

While members generally supported the proposal to allow supporting documents to be submitted up to the 31st December where these are not available earlier, many were concerned that a blanket movement of the deadline would delay payment processing and potentially simply move the problem of late documents into the following calendar year. Concern was also expressed that having two deadlines rather than one (15th May and 31st December) would lead more people to forget to provide paperwork by the second deadline.

As such, there was significant support for the retention of current deadlines for the provision of paperwork, but with an allowance for late paperwork to be accepted up to 31st December, subject to a penalty or other disincentive except where the provision of such paperwork by an earlier deadline was impossible.

Members also suggested that the penalty for the late submission of a SAF form might also be changed, such that there was a 1% penalty each day for 100 days.

## **6. National Reserve**

### **Proposal:**

Welsh Government proposes to retain the 2 year usage rule in order to “claw back” un-activated BPS Entitlements. In addition, allow farmers who have purchased new land or committed to a long term lease of 5 years or above, since 2015, to apply.

*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?*

### **FUW Response**

Members were divided in their views regarding the proposal to expand the National Reserve (NR) categories to include additional land acquired, with large numbers stating that the National Reserve should be kept as it is, with concern being expressed about potential adverse impacts of increased administration for Welsh Government due to large numbers of applications to the NR at certain times of the year.

Of those members who supported the proposal, many highlighted the need to cater for the large proportion of tenant farmers who take land on under Farm Business Tenancies which are for periods of less than five years.

Many members believed that if such a change was introduced young people and those starting out in the industry should be prioritised, and established farmers excluded - for example by only allowing those who had been farming for five years or less to be eligible to receive NR entitlement. It was also suggested that a cap might be placed on the number of NR entitlements an individual could be allocated - for example, such that a maximum of 54 entitlements could be allocated to any individual over a five year period.

Many members believed entitlements should be attached to land rather than CRNs, such that someone taking on land would be automatically eligible to receive payments on that land - a move which would negate the need for a National Reserve.

## **7. Inspection Rates**

### **Proposal:**

Welsh Government proposes to require an overall 3% selected sample of the full combined scheme population to be inspected, as opposed to up to 5% of individual and separate schemes. They would continue to monitor error rates to assess if additional inspections are needed to ensure satisfactory levels of compliance. They also propose to fully utilise cases selected as part of the European Commission RDP

inspection controls to contribute towards the overall BPS control rates. These proposals will reduce the number of inspections for individual claimants but retain appropriate inspection control rates to meet the combined requirements of EU law and domestic legislation.

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

### **FUW Response**

Members agreed with the proposed reduction in BPS inspection rates.

They also believed that the opportunity should be taken to adjust the Penalty Matrix in order to make penalties more proportionate in a range of circumstances.

## **8. Over-declaration of land**

### **Proposal:**

Welsh Government proposes to simplify the over declaration arrangements by removing the restriction that a 'Yellow Card' can only apply once per scheme and remove the requirement to repay the Yellow Card (the remaining 50%) if there is an over declaration in the following year. This means when the difference between the area declared and area determined for a crop group is more than either 3% or 2 hectares the area eligible for payment will only ever be reduced by 1.5 times the difference found.

*Q14. Do you agree with the proposal to remove the "Yellow Card" restriction?*

### **FUW Response**

Members agreed with the proposal but believed that the harsh penalties that can apply where larger areas are inadvertently over-declared should be reviewed in a way which reduces the financial repercussions for businesses - for example, where large areas of rocks on mountain areas have previously been mapped by officials, but these are then remapped in a way which reduces eligible forage area.

## **9. BPS Payment window for un-validated claims**

### **Proposal:**

Welsh Government proposes to change the payment model and remove the need for claims to be fully validated before making an advance of payment of 70% of the

anticipated claim value. The advance would be made automatically to all BPS claimants in October every year, subject to basic eligibility checks, with the balance payment made from February the following year once full validation checks are completed. Any overpayment of advance payment, would be offset in the balance payment, or recovered under the established debt process if required.

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

### **FUW Response**

The overwhelming majority of members wished to see the current system retained such that BPS loans were made available and balance payments were made in early December.

Members also agreed that the percentage paid through the BPS loan scheme should be flexible in order to ensure those with queries against claims which may result in payment reductions are still able to claim a percentage of their full BPS payment - for example, while the default loan might be worth 80% of a BPS claim, in circumstances where there is a query about 30% of the payment due to a dispute over the eligibility of a percentage of the land following a new tenancy, the loan amount should be reduced to 70% or less if so desired by the claimant.

Members were concerned that changing the target date by which balance payments are made to after February would reduce the rate at which claims are processed, resulting in delays in the uploading of validated data to the SAF/Land Parcel Identification Systems, meaning that the 'pre-printed' data on SAFs would be inaccurate. This is already a major problem for those whose applications have not been validated by the time data is uploaded to the SAF system, with some not receiving this data even by the 15th May deadline.

## **10. Active Farmer Requirement**

### **Proposal:**

Welsh Government proposes to remove the Active Farmer 'negative list' check, but retain the checks to ensure BPS beneficiaries are undertaking minimum levels of 'Agricultural Activity'.

*Q16. Do you agree with the proposal to remove the Active Farmer negative list requirement and retain the minimum levels of 'Agricultural Activity'?*

## **FUW Response**

Members supported the retention of minimal levels of 'Agricultural Activity' but overwhelmingly opposed the proposal to remove the Active Farmer negative list as they believed this offered an additional level of disincentive for those who are not genuine farmers and might otherwise be tempted to claim BPS.

However, some members considered that the negative list should be reviewed to ensure genuine farmers with other business interests are not being inadvertently excluded or required to submit paperwork to Welsh Government which increases bureaucracy for all concerned.

## **11. Hemp**

### **Proposal:**

Welsh Government proposes land used for the cultivation & production of hemp be removed from the list of eligible crop codes as no successful claim has been made in Wales since 2015. It will no longer be eligible for BPS.

*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?*

### **FUW response**

The FUW believes that if the presence of the hemp crop code has not generated any problems or additional work for Welsh Government for five years then there is no reason to remove it.

Moreover, if interest in natural fibres from hemp and/or medical use of cannabis derivatives for conditions such as certain types of epilepsy grows, a hemp crop code would have to be added back to the list if this proposal is implemented; members also believed that any such areas grown in future should be eligible for BPS payments.

## **Domestic Rural Development Proposals**

### **1. Principles, mission, objectives and priorities**

At the end of the EU Implementation Period, Welsh Government believes there will be an opportunity for new domestically funded support for rural development in Wales to contribute towards objectives and priorities specific to Wales, whilst continuing to apply the four EU environmental principles to the development of environmental policy.

Welsh Government believes that the Environment (Wales) Act 2016 and the Well-being of Future Generations (Wales) Act 2015 provide a framework in which support for rural development in Wales can be delivered. The Environment (Wales) Act 2016 also puts in place a delivery framework for the sustainable management of natural resources:

*Q18. Do you agree with replacing the EU mission, objectives and priorities for rural development support with Welsh specific definition for rural development?*

### **FUW Response**

The FUW appreciates the need to alter the EU mission, objectives and priorities for rural development, but rejects the proposal to replace it entirely with what is in effect a far narrower mission that severely waters down the needs of rural communities in relation to issues such as employment and economic sustainability.

Rather, members believed that the EU objectives and principles should be modified to recognise the fact that Wales is no longer a part of the EU without undermining their overarching focuses.

For example, the current EU derived RDP objectives and priorities are to:

- Foster the competitiveness of agriculture;
- Ensure the sustainable management of natural resources, and climate action
- Achieving a balanced territorial development of rural economies and communities including the creation and maintenance of employment
- Foster knowledge transfer and innovation in agriculture, forestry and rural areas
- Enhance the viability and competitiveness of all types of agriculture, and promote innovative farm technologies and sustainable forest management
- Promote food chain organisation, animal welfare and risk management in agriculture
- Promote resource efficiency and support the shift toward a low carbon and climate resilient economy in the agriculture, food and forestry sectors
- Restore, preserve and enhance ecosystems related to agriculture and forestry
- Promote social inclusion, poverty reduction and economic development in rural areas

By comparison, the proposed new Welsh Rural Development objectives and priorities, as listed below, are focussed almost entirely on environmental outcomes while objectives and priorities relating to wider Rural Development benefits such as rural employment and incomes have been largely or entirely removed:

- Maintain and enhance the resilience of ecosystems and the benefits they provide and, in so doing:
  - (a) Meet the needs of present generations of people without compromising the ability of future generations to meet their needs; and
  - (b) Contribute to the achievement of the well-being goals in section 4 of the Well-being of Future Generations (Wales) Act 2015
- Contribute to the 'principles of sustainable management of natural resources' by:
  - (a) Managing adaptively, by planning, monitoring, reviewing and, where appropriate, changing action;
  - (b) Considering the appropriate spatial scale for action;
  - (c) Promoting and engaging in collaboration and co-operation;
  - (d) Making appropriate arrangements for public participation in decision-making;
  - (e) Taking account of all relevant evidence and gather evidence in respect of uncertainties;
  - (f) Taking account of the benefits and intrinsic value of natural resources and ecosystems;
  - (g) Taking account of the short, medium and long term consequences of actions;
  - (h) Taking action to prevent significant damage to ecosystems
- Taking account of the resilience of ecosystems, in particular
  - i. Diversity between and within ecosystems;
  - ii. The connections between and within ecosystems;
  - iii. The scale of ecosystems;
  - iv. The condition of ecosystems (including their structure and functioning);
  - v. The adaptability of ecosystems.

The FUW fully respects and supports the need for the Rural Development objectives and priorities to include issues related to conservation of local environments, and the protection of the global environment.

However, we believe that the proposed objectives and priorities are so focussed on environmental outcomes that they fail to address the economic and social/cultural needs of rural communities, to the extent that they risk damaging the economic and social/cultural sustainability of Welsh communities.

On a related matter, Members raised concerns regarding the definition of 'rural', and how this might be changed in a way which diverts funding to what are in effect urban areas.

## **2. Measures**

### **Proposal:**

It is proposed to retain all the Measures and make minor amendments as set out above.

*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?*

### **FUW Response**

The FUW believes that the retention of the Measures would be welcome as it would provide a framework within which to continue to operate the RDP. Members also queried whether spending thresholds relevant to the Measures would be retained, and believed that a financial framework was also important in terms of the long term stability, governance and monitoring of the RDP .

Members also noted that such Measures were effectively in place across the UK, but that decisions to change or abandon these would result in divergence between the UK nations. It was therefore queried how this would be catered for within the UK administrations' Framework for UK Agricultural Support.

## **3. Governance and Administrative arrangements**

### **Proposal:**

- To replace detailed requirements relating to the content and amendment of a future domestically funded RDP with Welsh Government procedure and Senedd scrutiny.

- To strengthen the role of the Welsh Ministers in overseeing the new domestic RDP, by aligning with Welsh Government procedures and Senedd scrutiny.
- To remove regulatory provisions relating to finance for any new domestic RDP and replace with Welsh Government and Senedd accounting procedures.

*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?*

### **FUW Response**

The FUW fully appreciates the need to alter the governance and administrative arrangements to reflect the fact that Wales will no longer be a part of the EU.

However, it is believed that, where possible, arrangements should mirror those present under the EU framework, including in relation to scrutiny.

### **4. European networking**

#### **Proposal:**

The proposal is to remove the regulatory requirements relating to networking.

*Q23. Do you agree with removal of the requirements relating to networking?*

### **FUW Policy Department Comments**

The FUW appreciates the need to change the requirements regarding European networking, but believes that a requirement to share information, experiences etc. with others, particularly in the UK, should be retained.

### **5. Monitoring & evaluation and reporting**

#### **Proposal:**

To retain regulatory requirements to monitor and evaluate public expenditure on rural development, but to enhance and integrate processes and indicators.

To develop a set of objective indicators better aligned to Environment (Wales) Act 2016 and Well-being of Future Generations (Wales) Act 2015 and thereafter International reporting

To retain the requirement to report annually on the implementation of any domestic rural development programme.

*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?*

### **FUW Policy Department Comments**

The FUW has major concerns regarding any changes to the governance of the RDP over and above those necessary to recognise the UK's departure from the EU.

It is also noted that any significant divergence will, while the EU RDP continues to run alongside a domestic RDP, lead to parallel processes of governance, thereby generating additional work for the Welsh Government.

The FUW would highlight the repeated concerns expressed by the FUW and NFU Cymru during Wales Programme Monitoring Committee (PMC) meetings held over the past five years as well as in writing to PMC Chairs and Ministers regarding the lack of information provided to the PMC, compliance with RDP rules, overall transparency and the minimal time given during PMC meeting to consider matters relating to the RDP - actions by Welsh Government which prevented the PMC from fully meeting its obligations.

Such concerns have been vindicated by the Wales Audit Office/Audit Wales, which in December 2018 called on the Welsh Government to strengthen its scrutiny and risk management of the RDP, and in June 2020 found that the Welsh Government had awarded £53 million of RDP funds without ensuring the grants would deliver value for money.

As such, it is believed a dedicated RDP PMC should be created (as was the case under the 2007-2013 RDP) and its role strengthened to ensure a level of governance is in place which can be complemented by scrutiny through the Senedd and other means.

We would in particular highlight the comments made in response to Question 1 of the Domestic Rural Development Proposals section (Principles, mission, objectives and priorities) which highlight concerns regarding the degree to which EU principles,

objectives and priorities relating to people, jobs, communities etc. have been largely omitted from the new RDP principles, objectives and priorities - or at the very least watered down - with the focus being moved significantly to environmental objectives. Such a change and dilution represents a threat to rural economies and employment therefore the communities which the Welsh Government and Welsh Language Commissioner has acknowledged are particularly important in terms of the Welsh language.

*Q: We would like to know your views on the effects that the suggested proposals to the Basic Payment Scheme and Domestic Rural Development Scheme would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English.*

*What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?*

We would in particular highlight the comments made in response to Question 1 of the Domestic Rural Development Proposals section (Principles, mission, objectives and priorities) which highlight concerns regarding the degree to which EU principles, objectives and priorities relating to people, jobs, communities etc. have been largely omitted from the new RDP principles, objectives and priorities - or at the very least watered down - with the focus being moved significantly to environmental objectives. Such a change and dilution represents a threat to rural economies and employment and therefore the communities which the Welsh Government and Welsh Language Commissioner has acknowledged are particularly important in terms of the Welsh language.

As such, the positive effects would be increased and negative effects mitigated if the EU RDP objectives were retained and a greater emphasis placed on supporting rural and agricultural communities, economies and supply chains.

Further comments relating concerns regarding the impacts of changes on the Welsh language have been provided in response to the Welsh Government's previous Brexit and our Land and Sustainable Farming and our Land consultations.