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NORTH EAST SCOTLAND AGRICULTURE ADVISORY GROUP

Our Ref: AK/NESAAG
Please ask for: Derek McDonald
Direct Dial: (01224) 664606
E-mail: derek.mcdonald@aberdeenshire.gov.uk

Woodhill House
Westburn Road
Aberdeen
AB16 5GB
Fax 01224 664019

Mr Owen Jones
Head of Unit
European Commission Directorate General for Agriculture
Brussels

11 May 2011

Dear Mr Jones

Reform of the Common Agricultural Policy post-2013

I write as Chair of North East Scotland Agriculture Advisory Group (NESAAG), a cross-sectoral partnership drawn from the public and private sectors comprising three local authorities, Scottish Enterprise and HIE Moray, agriculture, forestry, food safety and environment agencies, private and industry bodies including academic and research institutions and industry and farming sector representatives.

I refer to your presentation to the Scottish Government CAP conference in Edinburgh on 16 March 2011 and your invitation to delegates to communicate their views regarding the Commission's current position on CAP reform. NESAAG's views are strongly aligned with the conclusions and recommendations of the Pack Inquiry and welcomes the many areas of common ground shared between the Inquiry's final report and the Commission's stance such as the need for an adequate CAP budget, retaining a two-Pillar structure, maintenance of direct support with area-based payments on better land and some coupled payments in disadvantaged areas, Pillar 1 'top-up' funds, greater equity and a better financial return for primary producers from the food supply chain.

The Commission's proposal to cap payments is however one significant area of divergence. Larger units – particularly in Scotland where 83% of the land is less favoured - have a particularly important role in producing food efficiently whilst also delivering on greenhouse gas emissions targets and other new challenges, current and new. Accordingly NESAAG believes that so long as recipients meet their (GAEC and similar) obligations under a better targeted CAP, there is no logical justification for capping payments to larger units - a view endorsed in the recently published Presidency conclusions.

NESAAG/...

NESAAG also notes the Commission's commitment to introduce a small farm scheme. Whilst recognizing the contribution that small units can make to the rural economy as well as to rural society and indeed the environment, NESAAG suggests that appropriate thresholds are set to avoid the cost of administration being disproportionate to (i.e. equivalent to or even exceeding) the value of the support for individual recipients (as is the case in England) to avoid dissipating scarce resources.

Yours sincerely



Cllr William Howatson
Chair, NESAAG