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

Yes. The devolved administration needs to be able to allocate whatever is necessary for devolved priorities. Forestry and farming policy and land management schemes require long-term commitments and planning. It should also include quality advice for land managers. This way we can drive the kind of engagement needed.

**Q2. Do you agree with the proposal to allow the Welsh Ministers flexibility to control any unspent funding allocated to BPS?**

Yes. It should stay within the rural sector but flexibility will help direct funds where they are needed.

**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?**

No. We need to avoid increasing the administrative burden for farmers.

**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?**

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

Yes. The principle of paying public money for environmental goods should apply across the rural sector, not just in forestry where it’s already enshrined in the UK Forestry Standard, and standards should be the same whatever the land use.

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

No. The standard for farming should be the same as for forestry. In forestry this is dictated by the UK Forestry Standard and the same should apply, to maintain and improve sustainable farming practices.

**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?**

Schemes should offer support across land management, not just for farmers.

**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?**

**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?**

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

No. Where there is significant public investment, there should be an appropriate level of inspection. If the payment methodology pays for actions, it needs to be sure these are being delivered. This will also help build an evidence base.

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

**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?**

We should focus on developing a flexible system that delivers the right support at the right time and avoid the kind of issues seen with Glastir Woodland Creation windows.

A significant proportion of the unmanaged woodland in Wales (which could be as high as 40%) is on farms and farmers should be encouraged to focus on the benefits their woods can provide. NRW has recently approved its long-term forest management planning process and long-term planning is really important for foresters and many land managers.

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

We would query how inclusive the definition of an ‘active farmer’ is and whether this includes timber growing and harvesting. The proposals in the consultation aren’t just for ‘active’ farmers but for ‘foresters and other land managers’ too. The term ‘farming’ can be misleading here, and certainly to our members.

**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?**

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

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

Plant health should be included due to its huge impact on climate and biodiversity targets.

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

Measure 8&15 should include all forest management (not just agroforestry/woodland creation), given the significant role good management has in addressing the climate and nature crises. Again, much of the unmanaged woodland in Wales is on farms and we need to encourage farmers to harness the benefits their woods can provide.

We’d also recommend stating support for zero carbon homes through the use of wood in construction.

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

Yes. The process should be improved and simplified as long as responsibilities are clear.

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

The important factors are accountability and clarity of responsibility.

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

No. It will still be necessary and desirable to engage with international partners and share knowledge, ideas and innovation on rural development.

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

Yes. There should be a way of measuring performance that encourages improvement and supports accountability in a way that meets priorities in Wales.

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

Yes.