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Llywodraeth Cymru
Welsh Government

Ein cyf/Our ref

All Assembly Members

16 June 2015

Dear Assembly Member,

In response to recent requests from Assembly Members I am writing to explain some of the resource implications of mapping Wales to a sufficiently detailed level to enable a regional payment option within the new Common Agricultural Policy Basic Payment Scheme (BPS).

As colleagues will be aware, the Welsh Government is currently consulting on new payment models for the BPS in the light of the legal challenge last autumn that led to the associated Regulations being quashed. That consultation ends next Tuesday, 23 June. One of the options under consideration, offered under the governing EU legislation, is a regional model based on accurately classifying farmland in accordance with objective and non-discriminatory criteria.

In order to operate a CAP direct payment system Welsh Government must be able to classify eligible areas at the level of 'land parcels' (usually, but not always, whole fields). Assembly Members will recall that the judicial review of our previously proposed 'Moorland' BPS region was successful on the grounds that we could not adequately ensure the equitable treatment of farmers in circumstances where a land parcel was identified as being part of one CAP region but had the characteristics and potential of land in a different category. As such, the current consultation document makes clear the potential risks associated with pursuing a further, regionalised payment option. The document also explains that re-mapping Wales for the purposes of the BPS would be the only wholly effective means of mitigating these risks, but goes on to indicate the likely time and effort involved in such an exercise. This letter expands on that information.

Current mapping data that the Welsh Government has at its disposal

Presently, the Welsh Government does not believe it holds any data at the required standard to produce sufficiently accurate maps for the purposes of making BPS payments at land parcel level. None of the mapping we hold (eg in relation to Glastir or other schemes) is either sufficiently comprehensive or robust to ensure fully equitable treatment between farmers across the whole of Wales. (Such mapping work was not undertaken with the aim of supporting CAP direct payments.)

Mapping to identify the quality and agricultural potential of the land would require making land capability assessments on-site (ie. mapping on foot). A combination of climate, site

(gradient) and soil characteristics assessments result in a classification identifying the range of crops that can be grown (including grass, cereals and horticulture), level of yield, consistency of yield and cost of obtaining that yield. This cannot be determined by aerial or satellite mapping alone. Equally, current land use data or maps showing vegetation (which can be heavily affected by local land management differences) are not reliable indicators of land quality.

Current data held by other Government/Public Sector departments

The current Agricultural Land Classification of England and Wales (ALC) could potentially be used to support a wider mapping exercise. However, the only maps of land quality covering Wales are intended for strategic use and have a minimum mapping unit of 80 hectares. There are some detailed site-specific ALC surveys in existence but these only cover around 5.3% of Wales.

Resource implications of a whole-scale mapping exercise

An experienced ALC surveyor can survey around 20ha per day, and about 5200ha per year (full-time on the exercise). With the total agricultural area of Wales standing at around 1.85 million hectares, colleagues will appreciate that re-mapping the whole country would be a very costly and time-consuming exercise, potentially running to tens of millions of pounds and several years.

Survey times for a full-detail vegetation map for Wales (another idea that has been suggested) would probably be similar to those for the ALC, but would also introduce a strong seasonality element; certain areas would need surveying at the right time of year and this would add to delays. In any event, as described above, a full vegetation map could not guarantee 100% accuracy as vegetation is prone to changes in distribution and type with time and management.

Administration of a regional payment model

In addition to the mapping exercise described above, significant changes to Welsh Government's IT system would in all likelihood be required as the ALC approach would inevitably lead to many current field parcels containing more than type of land. In addition, a comprehensive appeals system would need to be established to allow farmers to appeal either or both of the initial land classification or the resulting BPS decision. Both elements would add delays to implementation of any new arrangements and would also be expensive (running to several million pounds, and potentially 18-24 months' work).

I hope this helps clarify the issues involved and some of the risks associated with the regionalised payment option.

Yours sincerely



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