



CAP Reform Team
Welsh Government
First Floor, West Wing, CP2
Crown Buildings
Cathays
Cardiff, CF10 3NQ

07 May 2013

Dear Sir / Madam,

Consultation on Common Agricultural Policy Reform – Direct Payments to Farmers: Next Steps

Thank you for the opportunity to comment on this document.

The Institute for Archaeologists

The Institute for Archaeologists (IfA) is a professional body for the study and care of the historic environment. It promotes best practice in archaeology and provides a self-regulatory quality assurance framework for the sector and those it serves.

IfA has over 3,000 members and more than 70 registered practices across the United Kingdom. Its members work in all branches of the discipline: heritage management, planning advice, excavation, finds and environmental study, buildings recording, underwater and aerial archaeology, museums, conservation, survey, research and development, teaching and liaison with the community, industry and the commercial and financial sectors. IfA's Wales / Cymru Group has over 100 members practising in the public, private and voluntary sector in Wales.

The Common Agricultural Policy Reform – Direct Payments to Farmers: Next Steps

General

IfA welcomes the reform of the Common Agricultural Policy (CAP) in relation to Direct Payments as a means *'better [to] reflect the public service that farmers provide'* (paragraph 8 of the consultation document), thereby improving sustainability and strengthening the management and protection of the environment and, in particular, the historic environment.

This is consistent with Welsh Government's identification of the Culture and Heritage of Wales as one of the priority areas in its Programme for Government and reflects the importance of the historic environment throughout Wales.

Specific Questions

The answers below relate specifically to the historic environment.

8. Do you agree that a proportion of the direct payment should be dependent on environmental actions?

Yes. Greening provisions can deliver real benefits for the environment including the historic environment. The historic environment should be clearly identified as an integral part of any such provisions.

9. What percentage should be governed this way?

IfA supports the proposed figure of 30%. Ideally, the Institute would like to see a higher figure, but appreciates that the policy needs to balance competing considerations.

11. Do you think the Welsh Government should run a Small Farmer Scheme? Why?

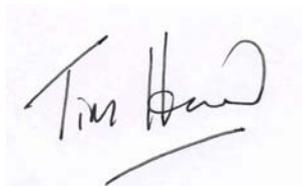
Only if there was no exemption from cross compliance and from Greening. All farmers should be subject to the same requirements in this regard in the interests of environmental protection. Otherwise this would undermine some of the fundamental aims of Pillar 1.

19. Do you think that transferring funds to the RDP is a good use of the funds?

Yes, given the scope within the RDP (particularly through Glastir) to support the management and protection of the historic environment.

We would be happy to discuss these issues in greater depth. In the meantime, if there is anything further that I can do to assist please do not hesitate to contact me.

Yours faithfully,

A handwritten signature in black ink that reads "Tim Howard". The signature is written in a cursive style with a horizontal line underneath the name.

Tim Howard LLB, Dip Prof Arch
Policy Advisor