



Sustainable Land Management
Welsh Government
Rhodfa Padran
Llanbadarn Fawr
Aberystwyth
Ceredigion
SY23 3UR

14 July 2014

Dear Sir / Madam,

Consultation on Common Agricultural Policy Reform: Welsh Government Cross Compliance Proposals for 2015

Thank you for the opportunity to comment on these proposals.

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 300 members practising in the public, private and voluntary sector in Wales.

IfA has successfully petitioned for a Royal Charter of Incorporation which was granted on 03 June 2014.

Common Agricultural Policy Reform: Welsh Government Cross Compliance Proposals for 2015

General

IfA's primary concern in relation to CAP reform, as implemented in Wales, is to ensure that it provides a robust framework to facilitate the management and protection of the historic environment.

In this regard, IfA particularly welcomes the broadening of the scope of GAEC F beyond the management and protection of Scheduled Ancient Monuments. Such monuments are a crucial part of the historic environment in Wales but constitute a small minority of Wales's heritage assets. (Over 95% of the historic environment in Wales is undesignated).

The Institute also welcomes the general approach to the proposals which focuses more on an outcome-based approach rather than the previous focus on process.

Specific Questions

Question 1: Do you agree with the introduction of the buffer zone for field silage required by SSAFO regulations for the protection of water from pollution?

1.1 No comment.

Question 2: Do you agree with the introduction of pesticide application buffer zones?

2.1 No comment.

Question 3: Do you agree with the principle of including silo and slurry store construction standards within Cross Compliance?

3.1 No comment.

Question 4: Are there any other requirements that should be added to this GAEC for the protection of groundwater?

4.1 No comment.

Question 5: Do you agree with the Welsh Government proposals for meeting the requirements of GAEC 4, 5 & 6?

5.1 No comment.

Question 6 Are there any additional provisions that you believe could be introduced to protect minimum soil cover?

6.1 No comment.

Question 7: Should cross-compliance be extended to include Historic Environment Features?

7.1 Yes. IfA strongly supports the extension of measures currently in GAEC F to embrace Historic Environment Features and endorses the analysis set out in paragraphs 48 to 50 of the consultation document (see above). Indeed, ideally the Institute would like to see measures which facilitate active management of all heritage assets, rather than simply protection from deliberate damage and destruction (see paragraph 52 of the consultation document).

Question 8: Given the importance of traditional boundaries to the historic Welsh landscape, should they be retained regardless of their condition, except for the purposes of widening existing access points up to 10 metres to enable machinery and animal access? If not, can you suggest other criteria to determine what boundaries should be protected/retained?

8.1 Yes. These are significant components of the historic environment. For similar reasons IfA also supports Welsh Government's proposals with regard to the retention of specific landscape features in GAEC 7 as set out in paragraphs 67 and 68 of the consultation document.

Question 9: Do you agree with the cutting and removal of scrub proposal?

9.1 No comment.

Registered address Institute for Archaeologists, Miller Building, University of Reading, Whiteknights, Reading RG6 6AB
tel 0118 378 6446 **fax** 0118 378 6448 **email** admin@archaeologists.net **web** www.archaeologists.net

The Institute for Archaeologists is the trading name of the Institute of Field Archaeologists

A company limited by guarantee: registered in England Number 1918782 The Directors are members of the Council of the Institute

Question 10: Do you think further clarification is needed on the best means to prevent the spread of invasive non-native plants?

10.1 No comment.

Question 11: Do you agree that, from January 2015, the existing rules should be further strengthened so that a penalty is automatically applied to Direct Payments in all cases where a TB test is overdue by one day or more and not just to those who are found at Cross Compliance inspections to have an overdue surveillance (WHT/IA12) TB test?

11.1 No comment.

Question 12: What are your views on the above potential approach?

12.1 No comment.

Question 13 Do you agree with the scope of activity for General Binding Rules, as suggested above?

13.1 No comment, save that consideration should be given to including activities liable to have an adverse impact upon the historic environment.

Question 14 Do you agree that NRW would be the appropriate enforcement body for General Binding Rules?

14.1 Yes, if General Binding Rules were limited to the areas listed in the consultation document.

Question 15 Do you agree that variable monetary penalties would be an appropriate enforcement mechanism for General Binding Rules?

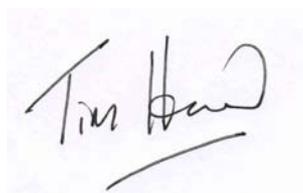
15.1 No comment.

Question 16: We have asked a number of questions related to proposals for changes to the Cross Compliance requirements. If you have any related issues which we have not specifically addressed, please use the space below to report them. You may also use this space to report issues with proposals to retain current Cross Compliance requirements:

16.1 No comment.

The Institute would be delighted further to contribute to the formulation of cross compliance proposals for Wales insofar as they relate to the historic environment. In the meantime, if there is anything further that I can do to assist please do not hesitate to contact me.

Yours faithfully,



Registered address Institute for Archaeologists, Miller Building, University of Reading, Whiteknights, Reading RG6 6AB
tel 0118 378 6446 **fax** 0118 378 6448 **email** admin@archaeologists.net **web** www.archaeologists.net

The Institute for Archaeologists is the trading name of the Institute of Field Archaeologists

A company limited by guarantee: registered in England Number 1918782 The Directors are members of the Council of the Institute

Tim Howard LLB, Dip Prof Arch
Policy Advisor

Registered address Institute for Archaeologists, Miller Building, University of Reading, Whiteknights, Reading RG6 6AB
tel 0118 378 6446 **fax** 0118 378 6448 **email** admin@archaeologists.net **web** www.archaeologists.net

The Institute for Archaeologists is the trading name of the Institute of Field Archaeologists
A company limited by guarantee: registered in England Number 1918782 The Directors are members of the Council of the Institute

