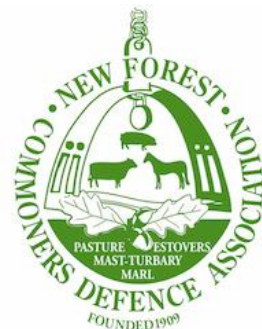


# New Forest Commoners Defence Association



Rt. Hon. George Eustice MP  
Secretary of State  
Department for Environment, Food & Rural Affairs Seacole Building  
2 Marsham Street  
London  
SW1P 4DF

28<sup>th</sup> February 2020

Dear Secretary of State,

## **Farming for the Future: Reference Period for Delinked payments**

I am writing to urge you to establish urgently the Reference Period for delinked payments. At the very least we would welcome a general statement that the Reference Period will relate to years prior to 2020, even if you are unable to specify which year or years.

The current ambiguity over the determination of the Reference Period for future payments has created a perverse incentive, where BPS payments for common land are tied to uncapped headage. The prospect that delinked payments may be provided as a lump-sum intensifies this perverse incentive for anyone holding BPS entitlements over the New Forest commons.

Responsible New Forest commoners, who have always maintained the essential grazing of the landscape through times good and bad, are being penalised. Those without this vocational commitment will continue to increase stock numbers in order to maximise their potential delinked payments. Those who resist the incentive to increase stock numbers will receive less throughout the transition period, thus threatening the viability of their commoning activities. This situation is already causing harm to the reputation of New Forest commoning. It is easy for people to look at the Marking Register and see rapidly rising stock numbers, although these numbers are increasingly unrelated to the number of animals actually grazing the New Forest commons because a marking receipt is the only requirement for a BPS claim.

The Commoners Defence Association is strongly committed to the transition to ELMS, poised to scale up on the exceptional achievements of the Verderers Higher Level Stewardship scheme. We are, however, deeply concerned that ambiguity on the Reference Period will cause lasting harm before we have the opportunity of ELMS.

Yours sincerely

**Tony Hockley**

Chair, New Forest Commoners Defence Association (CDA)

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