

# Federation of Cumbria Commoners

By e-mail:  
Mark Grimshaw,  
CEO,  
Rural Payments Agency

27<sup>th</sup> July 2016

Dear Mark Grimshaw (copied to George Eustice MP, Arik Dondi, RPA),

## Concerns about BPS 2015 payments on common land

I am writing to you to inform you of concerns raised by our members about BPS 2015 payments on common land.

The Federation of Cumbria Commoners was set up in early 2003 to be a representative voice to support and protect the commoners of Cumbria. We are a membership organisation and are open to all local commoners' associations and commoners in Cumbria with affiliate members in Lancashire and Northumberland. We currently have nearly 500 members.

Our concerns are as follows:

1. **No payment:** we have been told that there are still a few commoners in Cumbria who have not received any BPS 2015 payment at all. Please can the RPA focus on getting the money to these commoners and the rest of 0.5% of farmers who have not received a penny of their BPS 2015 claim as quickly as possible.
2. **Inconsistency and inaccuracies will undermine RPA's ability to deliver an accurate planned payments reconciliation process:** to date there seems to be no consistency in the way BPS 2015 has been paid on common land. This lack of consistency undermines our confidence that the planned payments reconciliation process will deliver accurate payments on common land. Below are some examples of the lack of consistency that we have come across:
  - a. In some cases, commoners have received the full payment for their in-bye (with errors usually) but nothing for the common.
  - b. In other cases, the RPA seem to have attempted to pay on the common as well but, in most instances, the notional hectareage bears no relation to what it was last year, but there is no explanation for the calculations, so we are in the dark.
  - c. Other commoners appear to have had a partial payment based on a proportion of their in-bye and common, but we are not sure it is consistently 50%.

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- d. There is similar inconsistency over entitlements. Where the common has been only partially paid or not paid at all, sometimes all the “excess” entitlements have already been wiped off, but in other cases, the original number is still there.
  - e. Likewise inconsistency in the way satellite imagery is interpreting moorland grazing, on some commons classifying it as unmanaged and ineligible white space on the BPS field parcels.
  - f. Dates of when commoners may expect the reconciliation payment vary from a few days’ time to not until the end of October.
3. **Insufficient information provided for the claimant to check the accuracy of BPS 2015 payments received:** the information claimants currently receive - the remittance advice and claim statement - are light on detail and currently fail to provide sufficient information to check that the total claim is correct. We agree with the suggestion from the Dartmoor Commoners’ Council in their letter to Arik Dondi dated 11<sup>th</sup> July 2016 that the audit sheets, available previously under the SPS regime, to again be provided to all claimants of BPS on common land. Furthermore, providing this information will reduce the number of contentious claims that will be raised with the RPA.

The above is all very frustrating given that the last few years of SPS ran like clockwork. More importantly the late payments of BPS 2015 claims on common land has caused considerable financial and personal stress and hardship to our members as they worry about their cash flow and ability to pay bills, and this on top of storm Desmond last December. We look forward to your assurances that our concerns above will resolved.

Finally, Brexit seems like an opportunity to come up with a workable farming support system that fits more readily with British farming businesses and then doesn’t need to be completely overhauled every few years. We would be very happy to work with you (along with other commoners’ representatives) to explore a farming support system that works on commons.

Yours sincerely,



Administrator, Federation of Cumbria Commoners