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Dear Rosemary,

## Ref: - Options for Basic Payment Scheme Entitlement Unit Values Post 2019

Thank you for the opportunity to respond to the above consultation.

The UFU have considered the consultation in great detail within its committee structure. Given the position that DAERA do not have the legal vires to implement any change in the unit value of entitlements in the 2020 Scheme Year in the absence of a minister, the UFU do not feel that there is any reason to respond at this time. We would ask DAERA to contact the UFU as and when it is appropriate for them legally to make this decision.

The UFU would like to highlight that members in the severely disadvantaged areas (SDA) will financially lose out while the entitlements are frozen in 2019. Almost 50% of Northern Ireland's suckler cows and 60% of our ewe population reside on these farms. This breeding population produces a significant quantity of livestock that are then used for further breeding or finishing on lowland farms. Production in hill areas is therefore of huge strategic importance in the context of supporting the red meat industry in Northern Ireland. The UFU continues to argue for the reinstatement of the Area of Natural Constraint (ANC) scheme. Worth £20 million to hill farming businesses and providing a vital support mechanism for SDA areas, a decision to reinstate the ANC scheme would make an invaluable contribution to Northern Irelands red meat industry, our economy, the environment and our rural communities.

We look forward to engaging with DAERA in the future on this matter.

Yours sincerely

Tor Firguron

Ivor Ferguson

President, Ulster Farmers' Union