

**DR. CAROLINE LUCAS**  
Green Party

for the South East of England

Commissioner Fischer Boel  
DG Agriculture and Rural Development  
The European Commission  
B1049  
Brussels  
Belgium

July 18<sup>th</sup> 2005

Dear Commissioner,

The purpose of this letter is to bring to your attention a matter which I believe is a misapplication of the CAP's cross compliance principle by the UK government.

I understand that the UK Department for Environment, Food and Rural Affairs (DEFRA) has persuaded the Commission that a range of non-agricultural activities should not affect farmers' eligibility for the new Single Payment Scheme. Included in the list of activities that are to be permitted are shooting (game) and deer stalking. Under DEFRA's interpretation of compulsory cross compliance, farmers that permit such activities to be undertaken on their land are still judged to be 'complying with environmental protection requirements' as required under the 2003 reforms to CAP.

Yet the Commission's own communications about cross compliance refer to the 'maintenance of habitats and landscape' and the 'protection of the farmed environment and its biodiversity'. I am personally unable to understand how hunting and shooting can possibly qualify as activities that promote biodiversity or conserve habitats. There is no credibility to the argument that stalking deer causes no harm to the animals or that hunting deer is a means of species conservation. Indeed some hunts have been criticised for damaging habitats and even successfully prosecuted for causing pollution and resultant loss of wildlife.

In the case of game there is even evidence that suggests it is actively responsible for the loss of biodiversity. According to extrapolations from the Game Conservancy Trust's own figures (2002/3), every year at least 4.5 million animals, including protected badgers, owls and kestrels, are killed by employees of shooting estates in an attempt to control potential predators. Loss on such a huge scale cannot possibly be compatible with 'environmental protection'. The UK government has traditionally argued that 'sports' such as game shooting and deer stalking promote conservation but there is a complete lack of evidence to back up this claim (see [http://www.league.uk.com/cruel\\_sports/pack\\_of\\_lies/conservation.htm](http://www.league.uk.com/cruel_sports/pack_of_lies/conservation.htm)).

As well, as disputing the terms of the Single Payment Scheme on the grounds that it does not adequately fulfil the requirements of compulsory cross compliance, I would also like to make you aware of a related problem. In an open letter on hunting the former Environment Commissioner, Margot Wallstrom, explains that:

*The "Birds Directive" recognises the legitimacy of hunting. But it does limit this activity to certain species. It also provides rules governing their exploitation. This includes a requirement that migratory species are not hunted during their return migration to their breeding grounds. These controls on hunting are intended to ensure a balance between the activity and the long-term interest of maintaining healthy and viable populations of huntable species.*

I am concerned that the message which DEFRA is sending out to farmers about the Single Payment Scheme places too much emphasis on their right to continue hunting, and does not go into sufficient detail about the legal restrictions. As I am sure you will appreciate, despite the Commission's commitment to pursuing breaches of legislation, in the case of the 'Birds Directive' such action is too late for those birds that in the meantime have been hunted and killed.

I would urge you, therefore, to ensure that DEFRA immediately clarifies to farmers that the current status of hunting game, as far as the Single Farm Payment Scheme, does not supersede any requirements laid out in the 'Birds Directive'. Furthermore, I respectfully request that the Commission looks again at the UK's interpretation of cross compliance with respect to deer stalking and shooting.

Yours sincerely,

A handwritten signature in black ink that reads "Caroline Lucas". The signature is written in a cursive, flowing style.

Caroline Lucas - Green Party MEP for South East England.