

Implementation of CAP Reform in England

2013: Consultation questions

Summary of Decisions and Questions

Direct payments: changes in the new regime

Decision: Number of basic payments regions (p14)

The Government has decided that we should not create any new regions nor amend the existing regional boundaries, in order to avoid unnecessary complexity in the transition to the new direct payments system.

Question: Regional distribution of direct payments (p16)

Do you support the principle of moving to more equal rates of payment across the three payment regions?

- Option 1: No change in the current regional distribution
- Option 2: Uplift in upland direct payments (with modest reductions to lowland direct payments), or
- Another option

Please comment further if you wish, or explain what other option you favour.

We endorse the Government's decision not to create any new regions, nor to amend the existing boundaries at this point in time. Given the particular pressures upon upland farms, and the nature and extent of the public environmental goods on which we rely upon them to provide, we would support the proposals under Option 2. Nonetheless, we believe that Pillar 2 payments (rather than Pillar 1 supports) are the most appropriate means of supporting upland farms, rewarding them for the environmental goods they provide.

Decision: Areas facing Natural Constraints (p17)

The Government has decided that we will not be introducing payments linked to an ANC designation at the present time.

Question: Reductions and the redistributive payment (p20)

Do you support our preferred option that we should apply the minimum level of reduction possible? If not, what level do you think should be applied?

- We should apply the minimum level of reduction possible (5% on receipts over €150,000).
- We should apply a higher rate of reduction but less than 100% (please explain what reduction you favour).
- We should make €150,000 the most any farmer can receive — this is the maximum reduction possible.

Please comment further if you wish, or explain what other reduction you prefer.

We endorse the Government's decision. We have no firm views in relation to the level of reduction, but we strongly support the principle that money recovered from reductions should be transferred to the Rural Development Programme, as the most effective means of delivering and supporting public environmental and other goods, including rural economic growth and farm business diversification.

Question: Salary mitigation (p20)

Do you support our preferred option that we should not implement salary mitigation? Please explain your response.

- We should not adopt salary mitigation.
- We should not adopt salary mitigation, provided that the rate of reductions is applied at the minimum rate of 5%.
- Salary mitigation should be allowed.

Please comment further if you wish.

We have no comments on this issue.

Decision: Redistributive payments (p22)

The Government has decided that, if we implement reductions, we will not also implement redistributive payments.

Question: Redistributive payments (p22)

Do you support our preferred option not to implement redistributive payments as an alternative to reductions?

- We should not implement redistributive payments.
- We should implement redistributive payments instead of reductions.

We support the Government's preference to instead apply reductions and to recycle any funds raised into the Rural Development Programme, which we believe to offer better value to the public.

Please comment further if you wish

Decision: Coupled Support (p23)

The Government has decided not to introduce a coupled support scheme in England.

Decision: Minimum Claim Size (p23)

The Government has decided that in order to achieve the best value for money, the minimum claim size for the new scheme should be fixed at five hectares.

Decision: Entitlements and the national reserve (p24)

The Government has decided to roll forward Single Payment Scheme entitlements into the new scheme.

Decision: Active Farmer Test (p26)

Ministers have decided to adopt a threshold of €5,000 for the purposes of applying the negative list, in order to minimise administrative burdens for farmers and the RPA.

Question: Active Farmer Test (p26)

Do you support our preferred option not to extend the list of ‘negative activities’ forming part of the active farmer test?

- The negative list should not be extended.
- The negative list should be extended.

Please comment further if you wish, or explain what types of businesses should be added to the list and why.

We have no comments on this issue.

Decision: Small farmers scheme (p26)

<p>The Government has decided that we should not operate a Small Farmers Scheme.</p>

Questions: Small farmers scheme (p26)

We must set a limit on the number of entitlements that can be claimed under the Young Farmers Scheme which must be between 25 and 90. What do you think should be the ceiling that can be claimed by an applicant to this scheme?

- A limit of 25 entitlements (the lowest limit possible)
- A limit of 54 entitlements (the average farm size in the UK)
- A limit of 90 entitlements (the highest limit possible)
- Another option

Please comment further if you wish, or explain what other limit you prefer.

Our preferred option is not to require those seeking to participate in the Young Farmer Scheme to meet additional eligibility criteria. Do you agree?

- We should not add additional criteria
- We should add additional criteria.

Please comment further if you wish, or explain what additional criteria you prefer.

We have no comments.

Do you have any other comments you would like to make on the issues addressed in this section on the implementation of direct payments?

Minimum claim size. We are concerned by the decision to increase the minimum claim size to a threshold of 5 Ha. We don't necessarily disagree with the Government's suggestion that the consequent removal of cross compliance from holdings less than 5 Ha will have a limited impact, although it would be useful to model what environmental assets holdings of this size actually contain. This would be a simple GIS exercise using RPA and other environmental datasets. However, because cross compliance is intended primarily to prevent adverse environmental (and other) impacts, not to provide enhancements, we are more concerned by the possibility that the decision to introduce such a threshold will mean that smaller holdings containing key environmental assets will nonetheless now become ineligible for NELMS.

Direct payments: greening

Decision: Blueprint for greening in England (p29)

<p>The Government has decided that the broad approach to greening in England should be to adhere closely to the measures set out in the direct payments Regulation.</p>
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Question: Blueprint for greening in England (p29)

The Government is not minded to take up the option to implement greening through a National Certification Scheme containing additional, equivalent measures. Do you agree with this approach or do you see a case for a National Certification Scheme and, if so, on what grounds?

We expressed the opinion in response to earlier consultations that we considered the greening of Pillar 1 payments had limited practical value, and that we felt strongly that instead greater emphasis should be placed upon delivering public goods and environmental benefits through Pillar 2. In that context we support the Government's general approach.

Questions: Greening (p32)

Do you agree that this approach to the implementation of greening in England strikes the right balance between environmental benefit and administrative cost, in the context of our approach to the CAP Reform package as a whole?

We concur with your conclusions (para 3.9) that there will only be low level environmental benefits delivered through greening, and in consequence, with your general approach. We have however made the point in response to earlier

consultations that in our view the industry-led *Campaign for the Farmed Environment* has failed to capture and maintain the wider landscape and heritage benefits which were previously derived from set-aside. We think it important therefore that EFAs should take the broadest possible approach to the definition of landscape features, and include heritage features. This would not only offer greater flexibility to farmers, but also go some way towards addressing the negative impact that the loss of set-aside has had in landscape and heritage terms.

Making available the full list of proposed Ecological Focus Area (EFA) options would enable the EFA requirement to be met without the need for additional action. However, individual EFA options may realise differing levels of environmental benefit. Which selection of Ecological Focus Area options do you favour?

As above, we favour a wide selection of EFA options as possible. We are aware that confusion amongst farmers about the proposed greening requirements (in relation to the maintenance of the area of existing grassland) has led to the cultivation (and destruction) of a series of nationally important (but undesignated) medieval sites which had formerly survived within grassland in the Midlands – as evidenced by English Heritage's *Turning the Plough Update Assessment 2012* (see <http://www.english-heritage.org.uk/publications/turning-the-plough-updateassess-2012/>). In all cases these were also regionally distinctive landscape features (that is, they contributed to the broader landscape character of their locale).

In the light of these unfortunate occurrences, and what we perceive to be the limitations in the mechanisms put in place to offset the environmental implications which resulted from the cessation of set-aside, we would strongly urge that historic landscape features are included within the eligibility criteria for “landscape feature” EFAs.

There is a particular interest to see benefits for pollinators arising from the implementation of greening. Are there any practical Ecological Focus Area options, or enhancements of these options, which could be easily adopted, have a high likelihood of uptake and which would be particularly beneficial for pollinators? Would these options be deliverable within the approach set out in the direct payments Regulation or would they need to be implemented through a National Certification Scheme?

We have no comments on this issue.

Cross Compliance

Questions: Cross compliance (p35)

Are there any current GAECs that you think should not be carried forward and included from 2015? If so, what are your reasons and evidence for this?

We have no suggestions in this respect.

Are there elements within any GAEC that you think should or could be changed, implemented better, or excluded? If so why?

Given what seems likely to be the reduced coverage of NELMS in relation to Environmental Stewardship, we are concerned that some of the incidental – but no less important - environmental gains for our historic environment derived from Environmental Stewardship scheme cross-compliance rules will be lost. Under the current ES scheme – which covers approximately 70% of useable agricultural land – agreement holder undertake to retain historic environment features recorded on the Farm Environment Record for the length of the agreement, irrespective of whether scheme options are applied to these features or not. Given that the coverage of NELMS will be reduced by an estimated 50% (paragraph 5.35, p.43); Members States retain flexibility for setting farmer requirements, and that the purpose of GAECs are to ensure that farmers receiving public payments do not degrade (inter alia) landscape features, we feel strongly that protection should be extended to undesignated but nationally important archaeological landscape features (as defined under the Ancient Monuments and Archaeological Areas Act 1979), where these features have been identified on the Selected Heritage Inventory for Natural England (SHINE) database, but that the discretionary powers under the 1979 Act not to add them to the Schedule of Monuments have been used. We consider that requiring land managers to retain (rather than actively manage) these features as a condition of single payments would not be unduly burdensome, and would avoid further occurrences of degradation and loss such as that described above (which arose from confusion over greening).

Rural Development Programme

Questions: The Current Rural Development Programme for England 2007-2013 (p39)

What lessons can be learned from the current Rural Development Programme? How can we build upon its successes?

In respect of the Government's objectives for the next programme (p.36, section 5, paragraph 5.2) we would endorse the second bullet (improve the environment), but stress that the environment includes the wider landscape, and

as part of this, its cultural heritage. This holistic approach is entirely consistent with the European Landscape Convention.

The multi-objective nature of delivery within the current Rural Development Programme has been one of its greatest strengths. Put simply, achieving one environmental or public good should not have a detrimental impact upon another.

We welcome the fact that 70% of England's farmland is currently under an agri-environment scheme (para 5.13): participation by the farming sector has now become the norm rather than the exception, and they have made extremely valuable and demonstrable progress in not only reducing the number of 'at risk' heritage assets, but in improving the condition of the historic environment generally. In so doing they have also contributed to rural economies, through conserving the landscape character which is such a driver for rural tourism. In the light of these achievements however we therefore have concerns about the likely decline in agri-environment coverage (para 5.35). We feel that this could adversely impact upon the protection currently afforded to the historic environment unless appropriate mechanisms are put into place to safeguard it.

Questions: Areas of focus under the new Rural Development Programme (p39)

Are there any key areas we have missed in our assessment of need to support the new Rural Development Programme? Are there any further sources of evidence of social, economic and environmental need in rural areas for England that have not been captured?

We have no comments on this issue.

Questions: Prioritising investment through the Rural Development Programme (p39)

Are the areas we outline for support under the new Rural Development Programme set out above the right ones?

We would stress the continued need for multi-objective delivery, in the context of which we would suggest that delivering rural economic growth need not be incompatible with preserving and restoring our environment (which, as explicitly recognised under the six union priorities, extends beyond the purely natural, encompasses the state of European landscapes and therefore includes the cultural heritage which is such an intrinsic part of their character). Multi-objective delivery also delivers both economies of scale, and "win, wins".

As an example, measures under Environmental Stewardship and the current Axes 3 and 4 which support the maintenance, conservation repair and re-use of redundant traditional farm buildings have not only secured the historic and landscape importance of these important historic assets, but provided a springboard for rural business diversification, either as part of existing farm businesses, or more widely within rural communities.

We think it is important that these synergies and achievements are recognised within the new programme, and that existing provision is maintained through future NELMS, LEADER and LEP delivery. This pertains to all rural heritage, but is particularly important in relation to traditional farm buildings, where redundancy and dereliction continue to be a significant factor in the loss of landscape and historic character, but achieving sustainable solutions can also be burdensome for farm businesses.

How we can best target investment under the new Rural Development Programme to help gain the maximum value for money for UK taxpayers?

We endorse the general approach outlined in the needs assessment (Annex C), and welcome acknowledgement of the value (economically and more broadly) of cultural heritage and landscape. It is important that the SWOT analysis takes this information into account and that future delivery recognises that a multi-objective approach offers not only the best value for money, but also the best environmental outcomes.

Questions: Redesigning Rural Development Programme Schemes (p41)

How might we make the process for applying for Rural Development funding simpler or less bureaucratic?

We have no comments.

How might this be balanced against the need to ensure clear accountability for public funds?

We have no comments on this issue.

Questions: Environment: restoring, preserving and enhancing our natural environment (p43)

What are your views on the structure of the proposed new environmental land management scheme, in particular the new “landscape scale” approach?

We recognise and endorse (paragraph 5.25) the need to continue a multi-benefit approach to delivery. In respect of the reference to an “ecosystem approach”, we would stress the need to maintain sight of the cultural aspects of ecosystems (currently being captured within Defra’s National Ecosystems Assessment Follow-on Phase, particularly in respect of cultural ecosystem services). Unless the cultural heritage element is maintained, and effective mechanisms are put into place to safeguard the historic environment, we are concerned that the reduction in future land management coverage is likely to have a negative effect upon our heritage.

Do you agree that we should not be prescriptive about how groups of farmers or land managers could be brought together to deliver landscape scale agreements under the proposed new environmental land management scheme?

Whilst we endorse an inclusive approach, and the suggestion that agreements would be expected to deliver against environmental opportunities in their area, we strongly believe that groups, farmers and land managers require a very clear (preferably map-based) steer as to which landscapes or areas Defra considers would benefit most appropriate from this kind of delivery. Since the likelihood is (paragraph 5.35, p.43) that coverage for this landscape scale approach will be very much less than that for the Entry Level Scheme, we think it advisable not to unduly raise expectations and to avoid groups expending effort where there is little real chance of a proposal progressing. Given that the rationale is to ensure more effective environmental outcomes (ie. the right options where they will derive the greatest environmental and public benefits), we feel that this approach would also reduce the potential for bids from areas where the organisation of groups may be good, but the environmental opportunities are lower.

How could we help facilitate landscape-scale approaches under the proposed new environmental land management scheme?

In addition to our comments about clarity (above), we consider that the advice of local authority historic environment curatorial staff at an early stage in the process would be extremely useful for groups working up proposals. This is not to be prescriptive, but to ensure that they’re able to fully benefit from the local knowledge that these staff have of the heritage assets, and the opportunities for their appropriate management.

Questions: Grant provision (p44)

Should we offer a capital only grant as part of the proposed new environmental land management scheme?

We would support the proposal for a small-scale capital grant scheme. As with our approach to the development of Entry Level Scheme options, the extent to which historic environment staff (either within local authorities or English Heritage) need to be involved in the process depends upon the nature of the works proposed. We think it appropriate that (as this strand of delivery is suggested as being competitive), grants should be given to conserve or maintain those assets where there is the greatest need (as identified within NELMS targeting). As with ELS, if these are otherwise “hands off” agreements (without the need for any other additional technical advice or assistance), in the case of Scheduled Monuments and Listed Buildings we would also need to ensure that the options are designed in such a way that the works to be undertaken do not require Scheduled Monument Consent or Listed Building Consent.

Questions: Proposed scheme elements (p44)

Do you agree with the principle that five year agreements should be the norm under the new environmental land management scheme? What approach should we take to targeting the new environmental land management scheme?

We consider that five year agreements are acceptable as a rule, but that there should be exceptions, and these should be based principally upon the nature of the environmental assets which NELMS will be protecting or enhancing, and the length of time required to effect an appropriate environmental outcome.

In relation to Scheduled Monuments on the Heritage at Risk Register (that is, deemed to be in imminent danger of degradation or loss) as a result of arable cultivation, we feel that the most effective means of securing the long term management of the monument is to conclude voluntary agreements which extend beyond six years and therefore extinguish the general agricultural Class Consent (under the Ancient Monuments (Class Consents) Order 1994). Once the general class consent has expired, further changes to the management of the monument will require Scheduled Monument Consent. This can be more closely tailored to the needs of the monument, and to fit in with the farm business requirements. Our policy is to allow agricultural operations (including arable cultivation) to continue on monuments so long as they are consistent with their longer term conservation. To this end we have almost completed the national Conservation of Scheduled Monuments in Cultivation (COSMIC) assessment, which reviews the risk levels for monuments currently under cultivation, and identifies whether further mitigation is necessary. This information will not only help to further refine Heritage at Risk, it would also be useful to improving targeting under NELMS, ensuring that both the most effective options are deployed.

In cases where the general Class Consent has been lost and the COSMIC assessment suggests that further cultivation (or restrictions upon the way in

which future cultivation is carried out) will be incompatible with the longer term conservation of the monument, or insufficient to reduce the risk of further degradation, we may recommend that the Department of Culture, Media and Sport refuses consent. In circumstances where this occurs the owner may be liable to compensation (from English Heritage).

For the reasons above we are therefore very strongly of the opinion that agreements relating to Scheduled Monuments on the Heritage at Risk Register due to arable cultivation should be treated as exceptions to the 5 year norm. GIS analysis of Scheduled Monuments falling within live Environmental Stewardship agreements has shown that there are currently 1204 which still remain at high risk due to arable cultivation (and which are therefore on the Heritage at Risk Register).

Question: Proposed scheme elements (p45)

With the exception of the highest priority sites, is there a case for making advice and guidance available increasingly on line or through third parties under the new environmental land management scheme?

We are firmly of the view that information, advice and guidance should be as freely available and as accessible as possible. Although ourselves, the Association of Local Government Archaeological Officers (representing local authority curatorial staff) and Natural England are collaborating on introducing fully digitised mechanisms for providing data and management advice (such as the SHINE into HLS project currently being piloted by EH and local authorities), and we believe that this will reduce the burdens upon both ourselves and applicants,. We also believe that the mid-tier, or elements of it would benefit from early (and probably direct rather than electronic) involvement from local authority curators in particular.

There is the potential to use other forms of existing guidance produced by ourselves and Natural England, such as that for National Character Areas (NCAs). English Heritage is contributing to Natural England's revision of the profiles for England's 159 NCAs, including the Statements of Environmental Opportunity (SEOs). These offer inter-disciplinary guidance on the critical issues which could help to achieve sustainable growth and a more secure environmental future, and in this respect would also fit very well within the NELMS targetting model. In addition to this English Heritage is developing strategic frameworks for identifying and assessing farmsteads (including traditional buildings), fieldscapes and settlement patterns, and these will also be made available as national guidance and also *Farmstead and Landscape Statements* for each NCA

Question: Scheme entry requirements (p45)

Where should we set the scheme entry requirements (ie above the legal baseline) for the proposed new environmental land management scheme?

In respect of the historic environment in particular, the current cross compliance and the future greening requirements look to be principally about avoiding damage to statutorily protected historic assets rather than effecting positive management or enhancements. They therefore support existing legal requirements, but do not go further. The exception to this is the current cross compliance measure in relation to the retention of stone field boundaries, which otherwise have no protection whatsoever. For this reason we believe that this cross compliance measure should continue, but since it too is about retention rather than enhancement, we do not think that there will be any potential instances of double funding in respect of the proposals for NELMS (including that relating to a capital only grants scheme).

Questions: Productivity: increasing the competitiveness and efficiency of our farming, forestry and other land-based sectors (p49)

Have we identified the right areas of support under the new Rural Development Programme to help improve the competitiveness and efficiency of the farming, forestry and other land-based sectors? Are there any other areas which could be supported?

What activities to support the farming, forestry and other land-based sectors under the new Rural Development Programme would provide the best value for money for the UK taxpayer?

We have no comments on this issue.

Questions: Advice and skills (p50)

How should we support advice and skills for the farming, forestry and land-based sectors under the new Rural Development Programme?

How can we ensure any advice provided to the farming, forestry and other land based sectors and through the new environmental land management scheme is integrated and linked with advice provided within the industry in the light of the Review of Advice and Partnership Approaches?

We have no comments on this issue.

Questions: Innovation (p50)

How do we ensure innovation is considered across the breadth of the new Rural Development Programme?

How could we develop proposals for an England specific European Innovation Partnership to support this?

We have no comments on this issue.

Questions: LEADER (p53)

How can we strengthen LEADER's contribution to delivering jobs and growth in rural areas?

We are strong advocates of the LEADER approach, not least because of the community basis (which means that LAGs are well versed in the needs of their localities, and represent the best means of delivering RDPE funding in the most effective and efficient manner). The range and breadth of projects delivered under the current programme also show that LEADER (and LAGs) are innovative and inclusive in their approach to delivering multiple environmental and economic outcomes.

How can we make the LEADER approach more effective and deliver better value for money?

We support the suggested expansion of the existing 64 LAGs so that a greater proportion of England is covered by LEADER. This will enable LEADER to work better with other existing local mechanisms and to provide more co-ordinated delivery. The opportunity for AONBs and National Parks to act as delivery mechanisms for the LEADER approach should also be considered given their knowledge and connectivity with local delivery partners.

The ability of LEPs to provide additional funding to LAGs from their Growth Programme allocations to help deliver micro enterprises, rural services and training, tourism and cultural heritage projects, and those enhancing village infrastructure should be strongly supported. We feel that the reversion of administration in relation to LEADER back to Defra will provide better value for money whilst providing a consistent approach and set of timescales across the country.

Question: Loans and other novel ways of funding (p53)

What role could loans or other financial instruments play in delivering the Rural Development Programme?

Whilst supportive of a more innovative approach in principle, based upon the experiences of the current programme (in securing 20% funding from applicants towards capital works on traditional buildings), in our view the introduction of loans would add an additional layer of complexity, and the administration costs would potentially outweigh the benefits.

Inter-pillar transfer

Questions: Inter-pillar transfer (p64)

Q: Should we transfer funding from Pillar 1 to Pillar 2?

We believe that Pillar 2 – and especially land management schemes – provides the best outcomes in terms of environmental and other public goods, and the best value for money. To this end we support the transfer of funds to Pillar 2.

Q: If so, should we transfer the maximum 15% or less?

Given the likely budget, the need to honour ongoing commitments from the previous rural development programme, and also to develop a new programme that delivers effectively for the environment, we would support the maximum transfer.

Q: If less, what should the Rural Development Programme fund less as a result?

- **Environmental land management**
- **Rural economic growth**
- **Farming and forestry competitiveness and productivity**
- **Other, please specify**

We have no comments.

Q: RDP funding can improve the rural environment, improve the competitiveness of the farming sector and productivity of the forestry sector, support growth in the rural economy, and strengthen rural communities.

What priorities should we spend RDP funding on?

In the light of our statutory duties, and the continuing levels of degradation and loss that both intensive agriculture and farm restructuring cause to our rural

heritage, we believe it essential that the environment continues to figure prominently in the next programme. In terms of achieving a balanced approach to the management and use of our countryside, and the public goods that it generates, we acknowledge that we rely heavily upon the agricultural sector and rural land managers. In short, we need a strong and healthy agricultural sector, with its skills, expertise and capacity to deliver the environmental public goods we desire. As we have said above, we do not however think that a strong emphasis upon achieving appropriate environmental outcomes is incompatible with other important aims, such as rural economic growth. The re-use of otherwise redundant traditional farm buildings can, for instance, contribute to farm business diversification, and the management of historic landscape features plays a role in maintaining the distinctive, high quality landscapes that are a driver for rural tourism.

Q: What proportion of RDP spend should we apply to:

- **Environment — agri-environment and forestry**
- **Farming competitiveness and forestry productivity**
- **Growth Programme**
- **LEADER**

Please explain your reasoning.

We strongly urge that the current balance between these priorities should remain largely as it is within the new programme. We believe that agri-environment measures in particular, if used in the right way, can not only achieve environmental objectives, but support farm businesses and rural growth. This is also true of LEADER. We have some concerns however about the effectiveness of moving RDP funds to (for instance) Local Enterprise Partnerships – not because of the partnerships per se, but because of the inconsistencies that are likely to result in terms of delivery. If significant funding is to go to the Growth Programme at the expense of other elements of the RDP, we consider it vital that there is effective national oversight, and that environmental bodies such as ourselves are given a suitable mechanism to advise LEPs on the potential within their areas to use environmental assets (such as traditional buildings) for activities related to growth and boosting rural economies. We do not mean by this taking a prescriptive top-down approach, or interfering with LEPs in their decision-making process. In the same way that we support LEADER and agri-environment, ourselves and local authority historic environment staff do however have data and expertise which can assist them in achieving their objectives.

Market management

Questions: Market Management (p67)

Do you agree that we should not introduce a requirement for written contracts between producers and processors/distributors at this stage?

Do you agree that we should not make it possible for producer organisations and inter-branch organisations to be formally recognised in additional sectors of agriculture?

Do you have any comments on this approach or any of these assumptions?

We have no comments on this issue.

Summary table of main impacts of the new CAP

Questions: Main impacts of the new CAP (p68)

Do respondents agree with the main conclusions of the analysis in the CAP reform evidence paper and in the RDPE Impact Assessment?

Are there any important impacts of the CAP implementation package that have been overlooked?

Are there any key inputs or assumptions where better evidence is available?

We have no comments on this issue.

Additional comments

We have no further comments to make.

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