



# ULSTER FARMERS' UNION

25 April 2014

Jim McManus  
Clerk to the ETI Committee  
Committee for Enterprise, Trade and Investment  
Room 424  
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**COM-01851**

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Dear Jim,

In reply to your letter dated 9 April I am writing to present the views of the Ulster Farmers Union in relation to the impact of Ground-Based Solar PV on Single Farm Payment in Northern Ireland.

Lightsource Renewable Energy believe that the presence of solar panels on farm land would have no adverse impact upon claiming SFP. In their correspondence dated 31 March, DARD replied by saying that EU legislations requires that the land claimed for SFP purposes is an eligible agricultural use for the entire scheme year and consequently, "as solar panels erected in a field may impede the agricultural activity...any area where agricultural activity is no longer predominant would be considered ineligible".

The UFU are concerned by the ambiguous and incorrect nature of the DARD reply. Their reply is in contradiction to what is stated in the DARD publication, "Guide on how to complete your 2013 Single Application (SAF1) and Field Data Sheet (FDS)". The guide sets out who is eligible for SFP; Farmer undertaking an agricultural activity; Hold payment entitlements and have eligible land; At least 0.1ha and the land on which you claim payment is at your disposal on 15 May of the year you claim. The next prerequisite concerns eligible land. This is clearly set out on page 38 of the Guide. It states that an "Agricultural activity is defined as the production, rearing or growing of agricultural products including harvesting, milking, breeding animals and keeping animals for farming purposes or maintaining land in good agricultural and environmental condition (GAEC)".

Solar modules as they are referred are mounted 2m above the ground with substantial gaps in between their siting, meaning that light and shades allows grass to grow. In such a case, it is our understanding that this would allow the land to be maintained in GAEC and eligible for SFP.

Low-grade land could be utilised which meets GAEC requirements. Consider the newspaper article "The Sunny Side of Solar Panels" written by Lucy Siegle in the Observer on 11 August 2013; he said "as long as sheep may safely graze in the gaps between the mounted panels they still get the single farm subsidy payment."

In light of what is stated in the 2013 SAF guide, the UFU would maintain that in certain instances, it would be possible to claim SFP on land containing ground-mounted solar panels and this should be taken into consideration.

Yours sincerely,

**CHRIS OSBORNE**  
**SENIOR POLICY OFFICER**