European Territorial Co-Operation

2014 – 2020

Preparing a new EU Programme for

Cross-Border Co-Operation (INTERREG V)

and a new EU Programme for

Peace and Reconciliation (PEACE IV)

2014 -2020

Summary of Consultation Responses

September 2014

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Part 1: Introduction

1.1 Background to Consultation Process

In April 2012, the Special EU Programmes Body (SEUPB), in its role as Managing Authority, was invited by the Department of Finance and Personnel in Belfast and the Department of Public Expenditure and Reform in Dublin to commence preparation for a new EU Programme for Cross-border Co-Operation (INTERREG V) and a new EU Programme for Peace and Reconciliation (PEACE IV).

An important step in the development of both programmes is to seek the views of stakeholders and members of the public on the shape and content of the future programmes. As such, a public consultation was held for a twelve week period from **28 August – 20 November 2012**. A summary of consultation responses can be viewed on the SEUPB website at:
http://www.seupb.eu/Libraries/2014-2020_Programmes/2014-2020_Programmes_130305__Final_Summary_of_Consultation_Responses.sflb.ashx

A second public consultation was held for a nine week period from **03 June 2014 – 29 July 2014**. The purpose of the second consultation was to provide the general public and other key stakeholders with an opportunity to comment on:

- Any aspect of the draft Cooperation Programmes (CPs).
- Section 75 Considerations.
- Strategic Environmental Assessments (SEAs).

A number of general questions, applicable to both programmes, were posed and stakeholders were invited to comment on:

- The Application, Assessment and Approval Process.
- Project Implementation.

During this period, the SEUPB organised nine public consultation events. These events informed stakeholders how to respond to the public consultation and provided an overview of the draft CPs. Almost 600 people participated in these events.

A full list of events is available in **Appendix 1**.

1.2 Consultation Responses

A total of 333 written responses have been received, to include: 117 PEACE-specific responses and 101 INTERREG-specific responses, in addition to a further 115 responses covering both the PEACE and INTERREG Programmes.

Figure 1.1: Consultation Responses by Programme
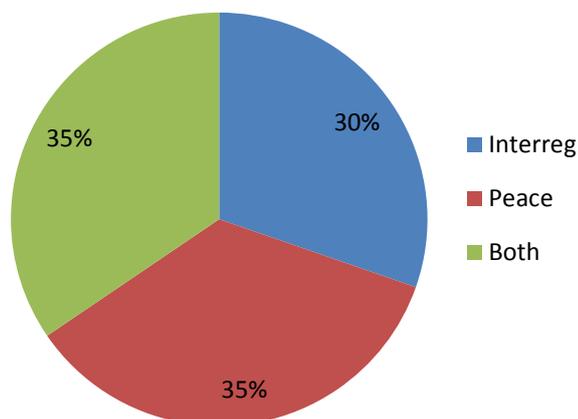
Base: 333 (Interreg: 101 | Peace: 117 | Both: 115)

The majority of these responses, a total of 221 (66%) were submitted by organisations/individuals from Northern Ireland, with 77 (23%) responses from Ireland and 35 (11%) responses from Scotland.

Figure 1.2: Consultation Responses by Geographical Area

Base: 333

In terms of the PEACE programme, 77% (n=178) of responses came from Northern Ireland and 23% (n=54) from Ireland.
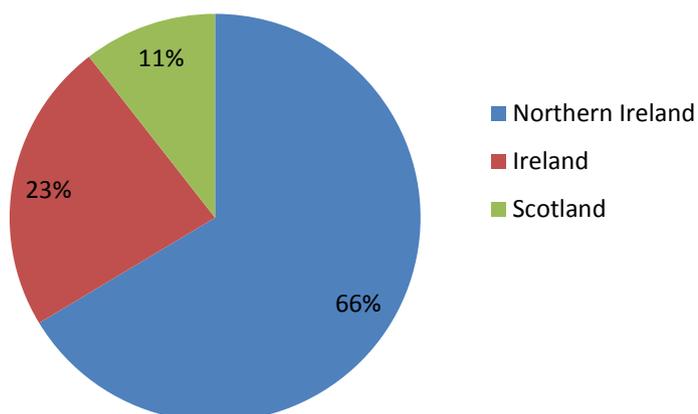
The composition of respondents for the INTERREG programme varies slightly, to include 59% (n=127) of responses from Northern Ireland, 25% (n=55) from Ireland 16% (n=34) of responses from Scotland.

Figure 1.3: Consultation Responses for INTERREG and PEACE by Geographical Area
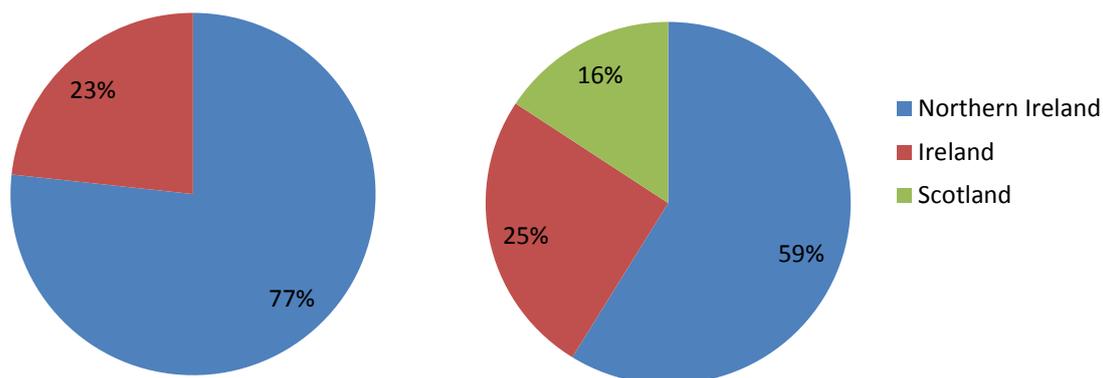
Base:
Peace: 232 (i.e. 117 Peace-specific responses plus 115 covering both programmes))
Interreg: 216 (i.e. 101 Interreg-specific responses plus 115 covering both programmes)

The responses received are from a range of organisations, with the highest number submitted from the community/voluntary sector (35%, n=116), followed by public sector related organisations (20%, n=67) and individuals (17%, n=57).

Figure 1.4: Consultation Responses by type of Organisation
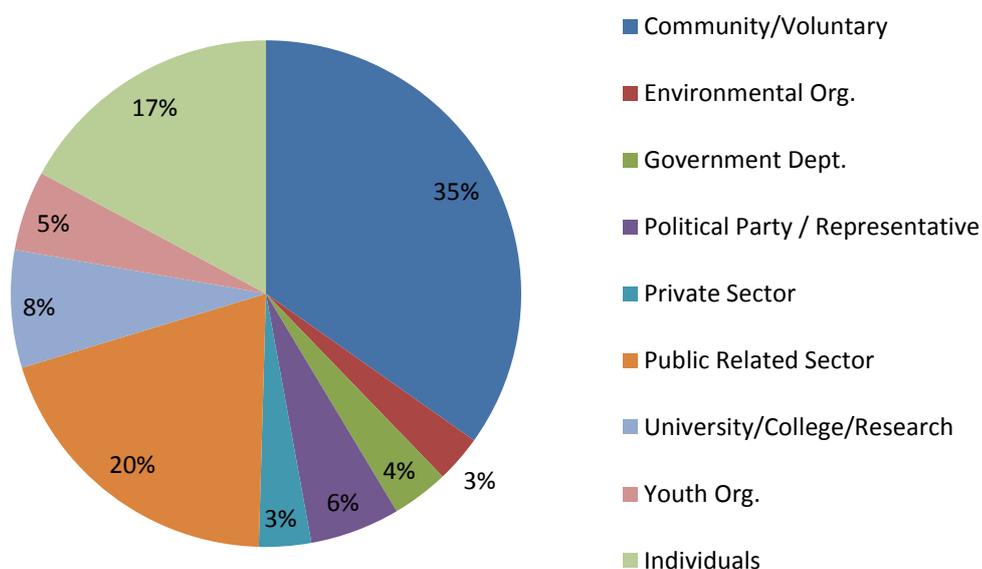
Base: 333

The figure below illustrates the breakdown of submissions received per respondent category, which are generally similar for both programmes, with the exception of a greater proportion of community/voluntary sector organisations submitting responses relating to PEACE. Given the nature of activities funded under INTERREG, there is a greater representation from University/College/Research, Private Sector organisations and environmental organisations, when compared to PEACE.

Figure 1.5: Consultation Responses by Programme
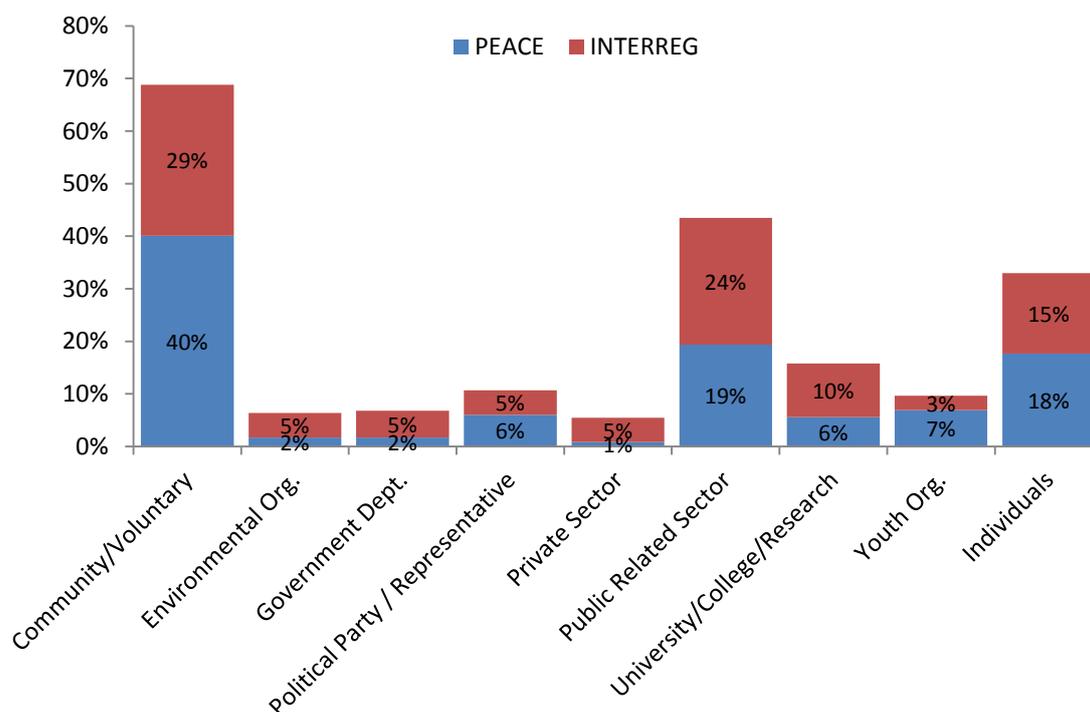
Base: Peace: 232 | Interreg: 216

In line with a commitment from SEUPB to provide a summary of consultation responses within three months following the end of the consultation period, the SEUPB has commissioned this independent 'Summary of Consultation Responses Document', which aims to provide a summary in a fair and consistent manner, which gives a flavour of the responses received.

Please note that it is important to read the document in the round, as comments are grouped according to the most appropriate question and the answers you provided may have been captured under a different question to the one you responded to. However, if you feel that any significant comment you have made has not been adequately captured, please inform SEUPB by emailing: consultation@seupb.eu

A list of respondents to the consultation exercise is listed in **Appendix 2**.

The consultation responses, as well as notes of the public consultation meetings, organised by SEUPB can be viewed on the SEUPB website at:
http://www.seupb.eu/2014-2020Consultations/2ndconsultationexercise/2ndConsultationfeedback.aspx

Next Steps

The Cooperation Programmes will be presented to the Northern Ireland Executive, the Irish Government and the Scottish Government (INTERREG only) for approval before being submitted by 22 September 2014 to the European Commission for negotiation and final approval. The Commission has indicated that the negotiation phase is likely to last approximately six months.

It is estimated that the earliest calls for applications is unlikely to happen before March / April 2015.

Disclaimer

Information contained in this document reflects the views contained within the consultation responses received. This document does not necessarily reflect the views of the Special EU Programmes Body.

Part 2: INTERREG V

2.1 Introduction

This section of the report details the results of the second consultation (*carried out from 03 June 2014 to 29 July 2014*) which sought the views from the general public and other key stakeholders on any aspect of the draft INTERREG Cooperation Programme (CP), the Section 75 Considerations and the Strategic Environmental Assessments (SEAs)

Consultation Respondents – INTERREG

All stakeholders were encouraged to respond to the consultation through the SEUPB website or by written submission; with 101 INTERREG-specific responses received, in addition to a further 115 responses covering both the INTERREG and PEACE Programmes (i.e. 216 responses relating to INTERREG).

The responses received are from a range of organisations, with the highest number submitted from the community/voluntary sector (29%, n=62), followed by public sector related organisations (24%, n=52) and individuals (15%, n=33).

Figure 2.1: Consultation Responses by type of Organisation
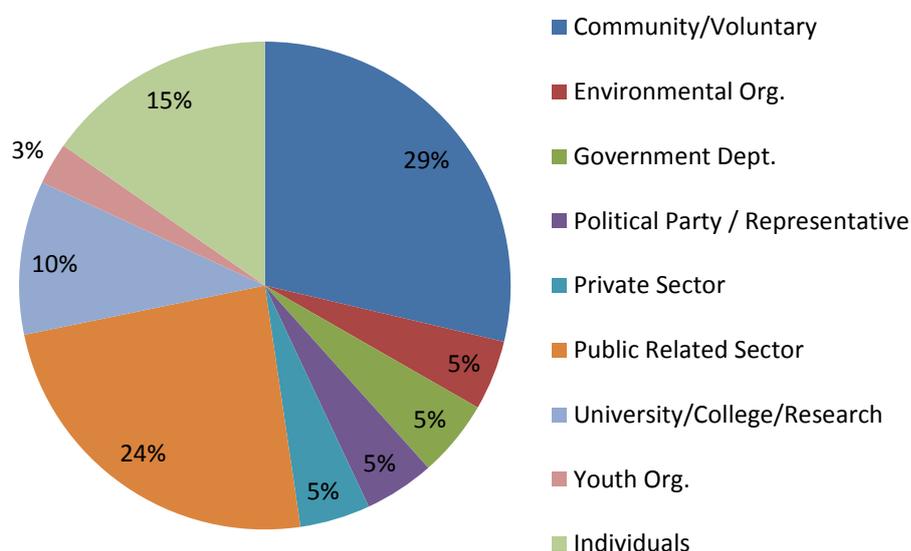
Base: 216

The statistics presented in Section 2.2 to Section 2.9 relate to submissions completed using the structured questionnaire (n=**189**). In cases where organisations/individuals submitted a response in letter format (n=27), these are considered within the overall qualitative analysis.

2.2 Research and Innovation – Health & Life Sciences and Renewable Energy

Q. Do you think that this specific objective and the actions to be supported are appropriate to meet the needs of the cross-border region?

Overall 63% (n=94) of submissions received agreed that the 'Research and Innovation' objective and associated actions are appropriate, compared to approximately one-quarter (24%, n=37) of submissions that disagreed.

Figure 2.2: Do you think that the 'Research and Innovation' objective and the actions to be supported are appropriate?
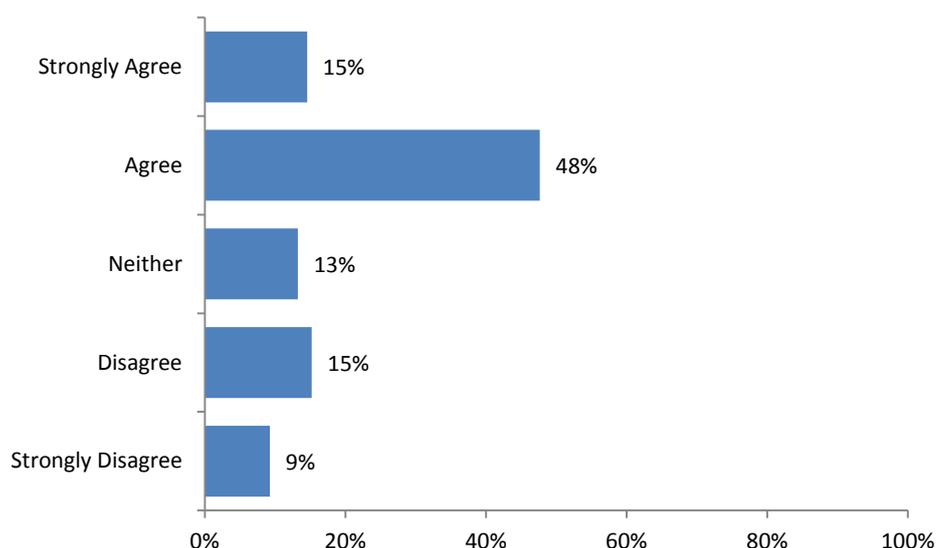
Base: 151 (No answer: 38 | Total: 189)

In terms of the breakdown of the 151 responses provided according to type of organisations, those in support of the objective represent Government Departments (100% n=6/6), Youth (100% n=4/4), University/College/Research (88% n=14/16), Public Sector Related (68% n=23/34), Community/Voluntary sector (60% n=26/44), and Environment (66% n=5/9). Submissions from 'individuals' were mostly in favour (48%, 12/25), with some (4/25) stating 'neither'.

Q. Do you think that the indicative €45m allocated budget for this objective is appropriate?

44% (n=65) of submissions agreed that the €45m budget allocation for the 'Research and Innovation' objective is appropriate, in comparison to 21% (n=30) of submissions expressing their disagreement.

Figure 2.3: Do you think that the indicative €45m budget is appropriate?
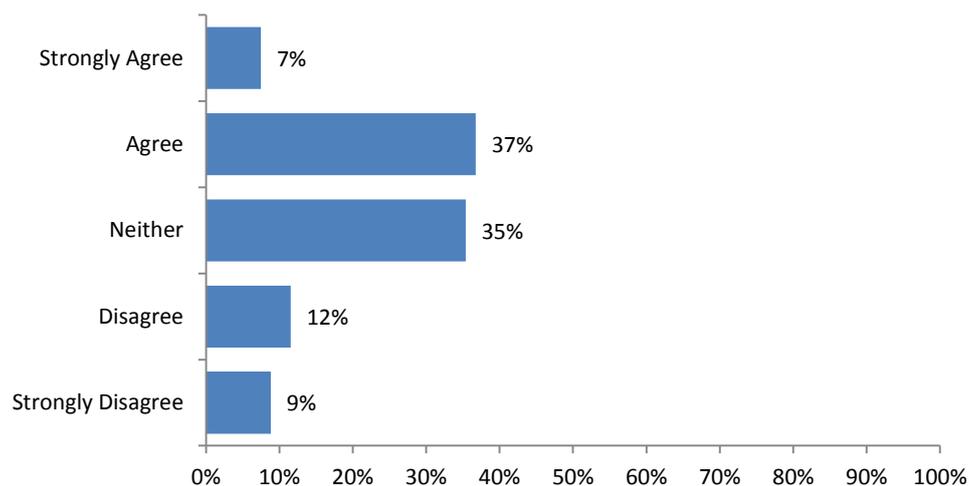
Base: 147 (No answer: 42 | Total: 189)

Of those that **strongly agreed/agreed** with the objective (Figure 2.2), 63% (n=59) of which also strongly agreed/agreed with the budget allocation. 27% (n=25) neither agreed nor disagreed and the remaining 8% (n=7) advocated a budget increase.

Of those that **strongly disagreed/disagreed** with the objective, 64% (n=23) also strongly disagreed/disagreed with the budget allocation.

Q. Please provide any comments you have on this R&I objective for the Programme

Most submissions were highly supportive of the need to increase cross-border research and innovation. Although, a number of submissions did request further information and evidence with regard to the rationale for selecting the two identified themes of 'Health & Life Sciences' and 'Renewable Energy'.

The need for all projects to be **additional** and **complementary** to existing initiatives was emphasised. The **avoidance of duplication** with activities under the responsibility of government was also emphasised by a number of submissions.

A focus on projects which **positively impact the economy** to include job creation was articulated – this will result in a *'tangible benefit from the programme which would assist enterprise development in the border regions and contribute to economic development* and will ultimately address the aim and ambitions for the EU Structural Funds Programmes, which state that '*the overriding issue for the programme should be the economy'*.

In terms of **'centres' of research competence and associated research programmes** in the defined sectors, the development of world class centres of innovation are endorsed, and particularly welcomed is the positive impact that could be gained from research contributing to high value jobs as well as commercial *'spin offs'*.

The need for the proposed centre to be **complementary** to existing provision was highlighted. For instance, one Scottish based research organisation mentioned the need to complement the various centres and critical mass of expertise in Glasgow. One respondent referenced Scotland's life sciences enterprise area, one of five sites across Scotland where businesses in the sector can benefit from incentives to relocate and grow. Others indicated that the programme would become a **catalyst for the growth** and **strengthening** of the region's research, development and innovation **infrastructure**. A number of submissions suggested developing a competence centre for the research and innovation sector in the North West region that would build on the educational and research capabilities of key institutions, referring also to the recently established collaborative network for the advanced manufacturing and engineering sector.

The need to create a '*hub'* in order to **develop networks** with centres of research excellence elsewhere was also advocated.

Support for meaningful **engagement**, **collaboration** and **partnership working** was expressed to achieve a strong applied benefit from the research to be undertaken. The possibility of developing **clusters**/partnerships rather than concentrating all resources into the centres of competence was suggested, citing that an increase in clusters/partnerships '*would enhance the research capacity of the various educational/research bodies in the eligible area and enhance further opportunities for collaborative funding under Horizon 2020'*.

A few submissions mentioned the 'Regional Strategic Framework for the Central Border Region' identifying the value of promoting sectorial clustering initiatives and the development of centres of excellence and economic corridors for key sectors such as engineering, manufacturing, food and sustainable development.

Feedback from submissions outlined the need for **third level institutions** to work with the **private sector** to develop programmes which fit with the skills requirement of the region. Collaborations with institutions will provide the critical mass to achieve research impact, as

reflected by a respondent. A general view was that Universities and Institutes of Technology have demonstrated strength in leading innovation in current and previous **collaborative partnerships** with **industry and SMEs**.

Following on from this, one respondent felt that the focus of research and innovation is too heavily concentrated on academic research, also asserting the need for a balance of practical **cooperation/collaboration between research institutes, SME's** and **large private companies**, another noting that there is too much focus on research institutions which are mainly centred in larger centres of population. These respondents recommended that there should be a proviso that projects must have at least one partner from an area which does not have a third level/ research institution, helping to build capacity in these areas.

Some submissions expressed the view that rural, agriculture and land-based themed activities should be considered. Agriculture and the land-based industries contribute to the economies of the stipulated areas, with submissions referring to the benefit of extending the activities within Health and Life Sciences to incorporate relevant rural themes including *'SMART'* farming, extension science to promote behavioural change and the 'package' around regional food production, added value, local marketing such as farmers markets and fostering of health education.

There is also strong acknowledgement and **support for renewable energy**. Submissions from organisations already engaged in research and innovation in these fields stated that funding could add '*considerable value'* to current efforts. Research into the potential environmental damage caused by energy developments was suggested by a number of submissions.

The opportunity for Northern Ireland and Ireland to identify and transfer good practice from Scotland as well as the need to research how communities engage with energy developments (including renewable energy) was welcomed.

The inclusions of action to support energy sources other than wave and tidal, such as offshore and hydroelectric were endorsed by some respondents, whilst others were of the view that '*wave energy and mass energy storage are at the outer limit of timescales for commercialisation*' and therefore a greater focus on the integration of renewable energy and distributed storage solutions is warranted, others citing the need for deep geographical energy development and ground source heat pumps.

A few respondents, although very supportive of renewable energy technologies, mentioned that proposals should be accompanied by an Environmental Impact Assessment to avoid unintended consequences. Other submissions stressed that funding in the area should be

targeted at increasing the capacity of the grid to accept renewable energy due the current lack of capacity being a limiting factor to growth.

A few submissions suggested the removal of the word 'mass' before energy storage, as this implied single large scale storage approaches noting that localised and/or distributed approaches to storage may be more effective.

Generally there was support for the proposed investment in enabler technologies such as ICT, referring to an opportunity to support industry and academia in driving research to market through ICT, helping to build upon existing expertise and capabilities as well as developing a premier centre of ICT research.

2.3 Research and Innovation – SMEs

Q. Do you think that this specific objective and the actions to be supported are appropriate to meet the needs of the cross-border region?

The vast majority (68%, n=91) of respondents agreed with the objective to increase the number of SMEs engaged in cross-border research and innovation activity, compared to only 13% (n=17) disagreeing.

Figure 2.4: Do you think that the 'Research and Innovation - SMEs' objective and the actions to be supported are appropriate?
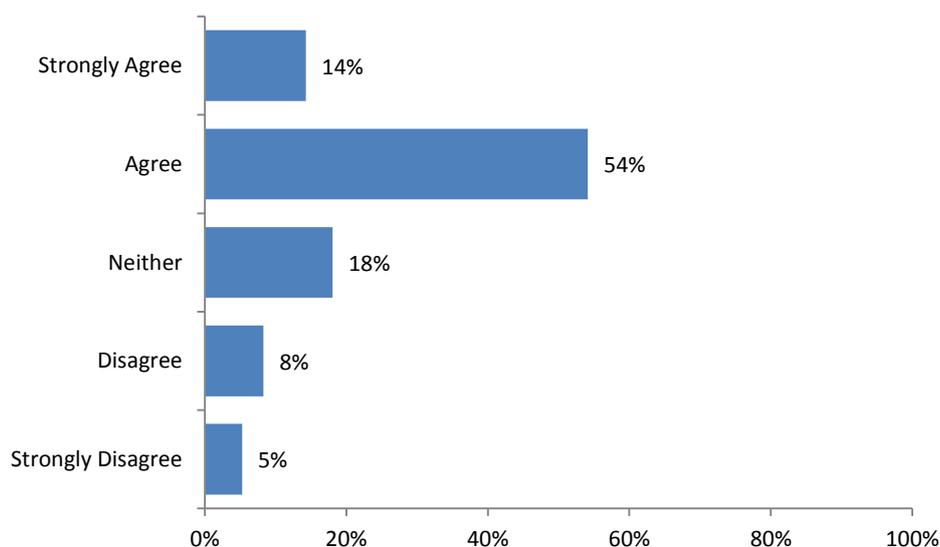
Base: 133 (No answer: 56 | Total: 189)

Q. Do you think that the indicative €15m allocated budget for this objective is appropriate?

30% (n=39) of submissions agreed and 27% (n=36) disagreed that the €15m budget allocation for the objective is appropriate, with the majority (43%, n=56) neither agreeing nor disagreeing.

Figure 2.5: Do you think that the indicative €15m budget is appropriate?
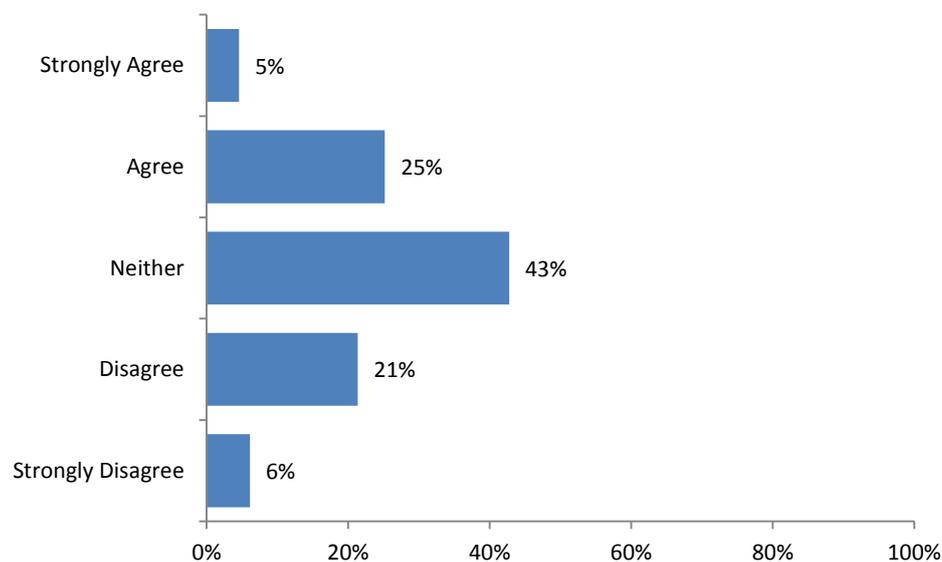
Base: 131 (No answer: 58 | Total: 189)

Of those that **strongly agreed/agreed** with the objective in (Figure 2.4), 40% (n=36) also strongly agreed/agreed with the budget allocation. 24% (n=22) disagreed, as a higher level of funding was sought which would '*recognise the local entrepreneurial growth required across the eligible area'*. The remainder stated 'neither'.

Of those that **strongly disagreed/disagreed**, 81% (n=13) of these also strongly disagreed/disagreed with the budget allocation. The remainder stated 'neither'.

Q. Please provide any comments you may have on this R&I objective for the Programme

The overall view was positive, with the majority of respondents supportive of the objective to increase the number of SMEs engaged in cross-border research and innovation activity. Submissions welcomed the proposed investment and acknowledged the positive contribution which the programme will make to raising levels of innovation awareness within SMEs across the eligible region.

The INTERREG Programme was referred to as a catalyst for further investment in research and development, which will contribute to meeting EU targets.

Some submissions strongly endorsed the need to include action to actively encourage the participation of micro-enterprises.

Collaborations and **strategic alliances** are endorsed, with many submissions articulating the need to actively involve SMEs in partnership arrangements with research institutes and private companies.

Submissions from University/Research related organisations cited evidence relating to significant advantages to adopting a collaborative, cross-border approach to research, development and innovation. They refer to the *'death valley'* gap between initial research and its eventual commercialisation. Providing support to SMEs to commercialise the output of research was therefore recommended, as well as creating an environment to '*promote the commercialisation of research from all these centres leading to the creation of high value jobs and new STEM businesses'*.

Various regional innovation strategies were outlined in submissions - one referenced the Innovation Strategy for Ireland which identifies networks, clusters and gateways as a key priority; another referred to the draft Innovation Strategy for Northern Ireland 2013-2015 outlining a vision that by 2015 Northern Ireland will be recognised as an innovation hub.

Ongoing **education and awareness building** was advocated as a requirement to engage SMEs in innovation activity. A *'pipeline approach to support'* was recommended, particularly where SMEs are in a position to access higher levels of research and development support. Awareness training tools and capability audits are generally regarded as appropriate and of benefit at the outset of a project. A few submissions agreed with the need for an **innovation internship programme**, which could mirror existing UK knowledge transfer partnerships schemes.

A few respondents felt that the focus on research and innovation is restricting access to support in other forms, noting that funding and priorities under the previous INTERREG IV programme assisted SMEs to become more competitive and innovative, building their capacity and ability to attain work in new markets. These submissions suggested a change in the wording and focus of the objective to include *'the competitiveness of SMEs which would include actions related to research and innovation'*.

The INTERREG IV Programme assisted SMEs with greater export orientation, which is regarded by some respondents as an action that should be continued, one respondent stating that collaborations and initiatives which seek to bridge SMEs with existing Irish/Scottish based business networks should be supported. Another respondent referred to the successes of InterTradeIreland's TradeLinks Programme, believing this to be a useful model for future programmes wishing to enhance SMEs export activities.

2.4 Environment – Habitat, Species & Marine

Q. Do you think that this specific objective and the actions to be supported are appropriate to meet the needs of the cross-border region?

Strong acknowledgement and support was expressed with regard to the inclusion of this objective, with 69% (n=86) of submissions indicating their agreement and endorsement for the proposed actions to protect the integrity of the region's biodiversity and improve its marine environment in order to create a more resource efficient and sustainable economy.

Figure 2.6: Do you think that the 'Environment – Habitat, Species & Marine' objective and the actions to be supported are appropriate?
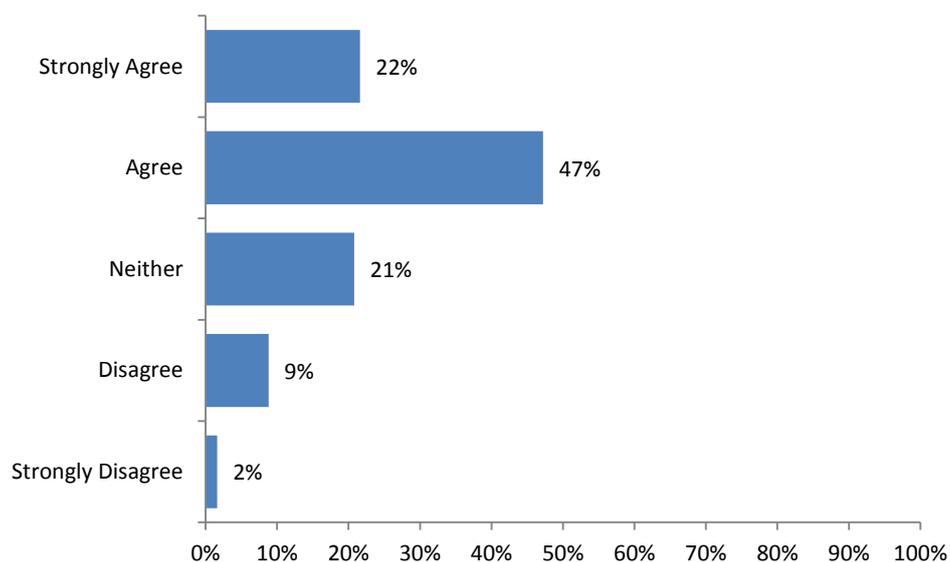
Base: 125 (No answer: 64 | Total: 189)

A minority (11%, n=13) disagreed that this objective and actions are appropriate to meet the needs of the cross-border region; to include submissions from five public sector related organisations and four community/voluntary sector organisations. Reasons for disagreement related to: possible duplication with existing programmes and/or government obligations with the need for evidence of additionality emphasised; lack of focus is a specific area of interest to the respondent; clarity regarding terminology; rationale for inclusion of specific actions; and lack of focus on areas of deprivation.

Q. Do you think that the indicative €22m allocated budget for this objective is appropriate?

45% (n=57) of submissions agreed that the €22m budget allocation for 'Environment – Habitat, Species & Marine' objective is appropriate, compared to 16% (n=21) that disagreed.

Figure 2.7: Do you think that the indicative €22m budget is appropriate?
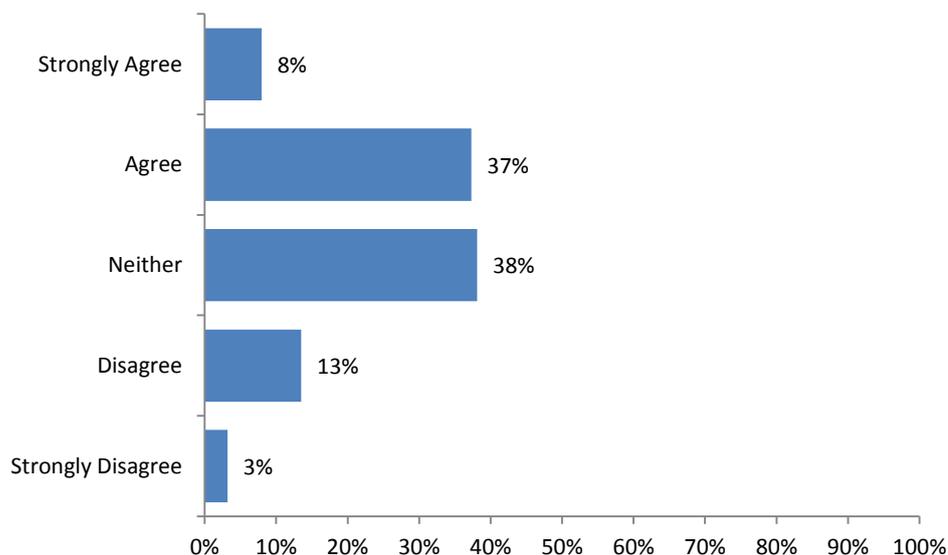
Base: 126 (No answer: 63 | Total: 189)

Of those that **strongly agreed/agreed** with the inclusion of 'Environment – Habitat, Species & Marine' as a specific objective of the INTERREG Programme (Figure 2.6), 68% (n=56) of which also strongly agreed/agreed with the budget allocation. 8% (n=7) disagreed and supported a budget increase to address the wide ranging actions listed in the draft CP. The balance of respondents neither agreed nor disagreed. A few respondents recommended combining this objective with the Environment – Water Quality objective (Section 2.5) budget (i.e. €72m), as projects under these themes can often be integrated.

Of those that **strongly disagreed /disagreed** with the 'Environment – Habitat, Species & Marine' objective (Figure 2.6), 77% (n=10) of which also strongly disagreed /disagreed with the budget allocation.

Q. Please provide any comments you may have on this Environment objective for the Programme

Support was widely acknowledged for the proposed range of actions under this objective and submissions welcomed the opportunity to contribute to meeting the requirements of the EU Habitats and Birds Directives; the EU Marine Strategy Framework Directive, and the EU Atlantic Strategy and Action Plan.

Many submissions articulated strongly the need to ensure that the projects delivered under this objective do not duplicate existing programmes and work carried out by other organisations and under the statutory responsibility of central government, therefore the **need for 'additionality'** was emphasised.

A submission, from an environmental organisation, suggested that a programme wide appraisal, rather than project level, would result in the best use of available funds and to ensure consistency of approach. A further submission commented on the need to carry out an **assessment of need** prior to defining actions in the draft CP. It was also noted that consideration should be given to creating synergies between the Environment objective and the other INTERREG objectives, this would provide greater impact and value for money.

The wide-ranging opportunities for **cross-border** and a **multi-jurisdictional approach** were highlighted, which will address common needs and maximise potential benefits.

In terms of developing and implementing projects, a partnership approach involving administrative and technical experts from each participating jurisdiction is advocated.

It was widely considered that outreach work and **education related projects**, to include environmental education in schools, should be promoted to encourage local communities to interact with their environment. It was believed that this will result in the following benefits: create a better scientific understanding of regional environments; raising public awareness of the importance of the environment; creating social inclusion through environmental awareness programmes; and ensuring people can easily access nature and understand their connectivity with the environment, which is believed to be *'crucial to protecting and restoring biodiversity'*.

A few issues were raised with the regard to the terminology used within the draft CP when compared to the consultation document; and the apparent disconnect between priorities, objectives and actions. For instance, comments provided include:

- *There is no Biodiversity Directive. Biodiversity is a key theme of the Habitats, Birds and Marine Strategy Framework Directives. / The term "Biodiversity Directive" is incorrect and should refer to the EU Habitats and Birds Directive.*
- *The terminology is not consistent throughout the documents, and different concepts are being introduced. The objectives do not match the themes, and the indicators do not always relate to actions.*
- *The objective as currently worded does not include Green Infrastructure, although the overarching investment priority refers to Green Infrastructure.*
- *The language used in the consultation document appears to preclude Scotland's involvement in certain projects.*

Specific Objective 1: The recovery of habitat and species of EU concern within protected areas that are contiguous to the border (€11m)

Clarity regarding the use of the term **'protected areas'** within the specific objective was sought by one submission, as this these area are already subject to enhanced management practices or the discontinuation of environmentally detrimental activities. A few submissions also requested clarification of the term *'areas that are contiguous to the border'* and what this relates to; asserting that this focus may confine activities. A few submissions stated that a regional wide approach would result in greater impact and therefore projects should be considered that extend beyond protected sites and in areas not contiguous to the border, as many of these areas are of high biodiversity value.

Cross-border co-operation in the development of **management plans for cross-border sites** is welcomed as a necessary approach to understanding ecological networks and restoring native biodiversity. A few submissions recommended that management plans be clearly defined and include: baseline indicators to determine the current conservational status of the site; specific activities and measures needed to improve sites, linked to output indicators; and interventions with associated costing schedules.

As a prerequisite to actions and **research into species and habitats**, mapping sites was recommended to increase understanding of ecological systems and networks, with particular reference to migratory species which are dependent on multiple ecosystems. The need for actions to be governed by a trans-national framework was noted by one environmental organisation. One submission commented on the need to assess risk, vulnerability, susceptibility, resilience and adaptation in the response to climate change and biodiversity protection.

In terms of **breeding programmes**, one respondent mentioned that work could be carried out on species recovery or repopulation of protected species. A few respondents referenced the following species as appropriate for breeding programmes: red squirrel, Irish hare, and pearl mussel. Actions supporting the understanding of biodiversity loss and improved management of exploited species were suggested by a respondent.

Support for **land management activities** was welcomed. One submission referenced that the predominant land use type within the INTEREG Programme area is agricultural in nature, and contains a diverse range of habitats of varying species.

Specific Objective 2: To promote effective cross-border cooperation to ensure high quality transitional, coastal waters and marine waters (€11m)

A few submissions expressed that the term **cross-channel links** should be used when referring to the marine objective and actions. Related to this was the need to focus on inter-regional cooperation on the east-west axis in addition to the north-south dimension.

Acknowledgement of the positive impact the marine environment has in delivering social and economic growth through the provision of ecosystem services was mentioned.

Many submissions advocated their support relating efforts to **remove invasive species**. Gaining a greater understanding of how to curb the import, spread and incidence of invasive species is important to eventually eradicate or prevent the threat. Due to the inherent difficultly in removing invasive species, one respondent suggested that this action should be broadened to the '*Monitoring, Management and Removal (where possible) of invasive species*'.

Whilst actions involving the development and implementation of **cross-border marine management plans** are supported, two submissions indicated that this should be expanded to include transitional waters. The mapping of **marine/seabed environments** is regarded as an important aspect of understanding seabed topography and geology.

The creation of a **regional cross-border marine centre** was specifically mentioned by a few respondents, who support the project. However, due to the limited budget available, one respondent did caution that careful consideration is needed with regard to the balance of spend between revenue and capital investment programmes, with a focus on sustainable solutions being a priority.

A further respondent reflected that two centres of research and innovation are proposed, one of which relates to 'Health & Life Sciences', therefore questioning whether this will include research focused on the Environment theme. If this is not the case, this respondent goes on to highlight the possibility of creating an Environmental research excellence centre.

The importance of **research and development in the marine environment** was acknowledged. Areas of focus suggested by a few respondents include: species that are migratory and dependant on transitional, coastal and fresh waters; research on protection and creation of habitats that are suited to the native species colonisation; coastal zone management, covering both biodiversity and climate change adaption aspects.

In terms of **marine skills development initiatives**, the potential exists to explore the feasibility of working with NEETs to develop marine skills; and training of marine scientists as part of their university training.

A **co-ordinated research programme** is supported, with the need to take account of current research across the three jurisdictions recommended. This will ensure projects are strategically planned, developed and implemented, as asserted by a few respondents.

Additional project ideas:

The following lists additional common actions suggested and supported by a number of submissions:

- Energy efficiency innovation.
- Renewable energy - wind, wave and tidal energy projects / hydro-electric power.
- Carbon reduction measures / reducing carbon footprint and increasing efficiency.
- Improving understanding and application of the concept of ecosystem services, including how ecosystems provide protection from the negative impacts of climate change.
- The involvement of the tourism sector as a key marine and environmental contributor/beneficiary / development of eco-tourism, recreation, aqua culture, mariculture, cruise ships and recreational sea angling / scope for activity around marine tourism infrastructure projects and culture/ built heritage.

Other suggestions by individuals include:

- Actions aimed at improving cross-border civil protection in relation to marine and inland water pollution and flooding events.
- Research into how the local environment provides for local food supply, linking to both climate change issues and land management.
- Sustainable usage of former landfill sites / investment in waste management approaches and technologies.
- Projects considering the impact of aquaculture on the marine environment.
- Interregional partnerships dealing with; All-island Species Action Plans, activities which increase fish stock levels, and raising awareness of the value of biodiversity.
- Reducing the greenhouse gas emissions from the agri-food sector / agri- environment related research.
- Field studies and scientific research opportunities.

2.5 Environment – Water Quality

Q. Do you think that this specific objective and the actions to be supported are appropriate to meet the needs of the cross-border region?

65% (n=82) of respondents were in majority agreement that this objective is appropriate to meet the needs of the cross-border region and that the actions proposed will have a positive long-term impact on the quality of water.

Figure 2.8: Do you think that 'Environment – Water Quality' objective and the actions to be supported are appropriate?
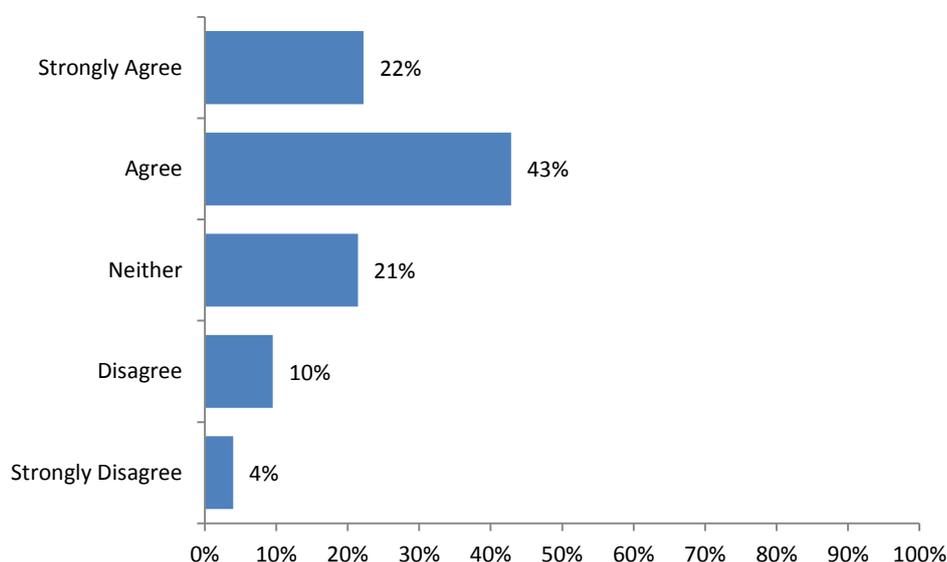
Base: 126 (No answer: 63 | Total: 189)

14% (n=17) of respondents disagreed, to include eight submissions from Northern Ireland; six from Scotland; and three from Ireland - mainly representing public sector related organisations (n=8). Disagreement largely related to potential duplication with central government responsibilities and other EU programmes and perceived lack of a focus on Scottish priorities.

Q. Do you think that the indicative €50m budget for this objective is appropriate?

39% (n=49) of respondents agreed that the budget allocation is appropriate, with the majority (44%, n=56) stating that they neither agree nor disagree with the €50m budget, whilst 18% (n=22) disagreed.
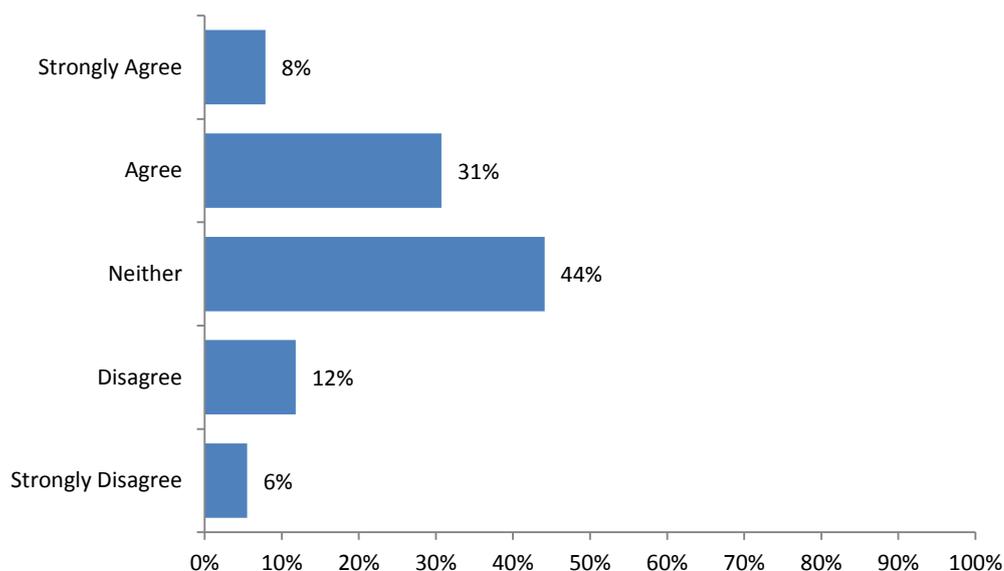
Base: 127 (No answer: 62 | Total: 189)

Of those that **strongly agreed/agreed** with the inclusion of 'Environment – Water Quality' as a specific objective of the INTERREG Programme (Figure 2.8), 60% also strongly agreed/agreed with the budget allocation. 37% neither agreed nor disagreed. 3% disagreed and supported a budget increase.

Of those that **strongly disagreed /disagreed** with the inclusion of 'Environment – Water Quality', 100% also strongly disagreed /disagreed with the budget allocation, stating that it is either too high or not proportionate to other objectives.

Q. Please provide any comments you may have on this Environment objective for the Programme

Generally there was a high level of support for actions supported under the 'Environment – Water Quality' objective to improve water quality in cross-border river catchment areas and shared transitional and coastal waters to meet the requirements of the EU environmental acquis.

The issue of potential duplication was raised by a number of submissions, asserting that the funds should not be allocated to government departments to meet their existing obligations. A few submissions specifically referenced possible duplication with the EU Life+ Programme and other central government interventions, stating that these actions are already resourced and therefore the focus should be on supporting other priorities. These submissions strongly emphasised the need for INTERREG to fund projects which are clearly **additional** and sought assurances of same. One submission suggested that duplication can be avoided through consultation with SEUPB and potential applicants, as well as a strategic approach taken to the allocation of the budget.

Some submissions highlighted possible **synergies** between the actions proposed within the Environment objective and those listed under the 'Research and Innovation' objective – where improvement in water quality will be of wider benefit to both biodiversity and the quality of the marine environment. For instance, where innovation in relation to green technologies (e.g. hydropower, tidal power) can help to safeguard ecosystem services (e.g. aquatic biodiversity, food, tourism).

One submission noted that projects should be developed with input from local authorities to ensure **complementarity** with local and regional activities. Related to this, is that consideration is given to local authorities as potential delivery partners for schemes which have a regenerative impact within the designated area. Clarity is needed regarding the role of local authorities and eligibility for applying for and delivering projects.

It was also cited that improved water quality has the potential not only to enhance biodiversity but to stimulate the provision of sustainable ecosystems services. This in turn can help stimulate green and blue sector economic growth. The potential economic benefits that would be derived from improved water quality for recreational purposes were posited by a few respondents who endorsed tourism related projects.

Funding dedicated towards the delivery of the **river basin management plans** was positively received and viewed as a high priority by some respondents.

Cross disciplinary and cross-community involvement was recommended as a means of involving a wide-range of stakeholders and **engagement** with the local community. Linkages and two-way communication with farmers should be promoted, as farmland makes up large areas of river catchments. A **catchment based approach** is welcomed as a means of involving local communities in decision-making and strategies are comprehensive and inclusive of all stakeholders.

Of those submissions which specifically referenced **river habitat restoration schemes**, all welcomed funding directed to this action. The need to reconnect rivers with their banks and

floodplains, lakes with their shores, and all water bodies with the wildlife around them was reported by one respondent. Another respondent suggested that consideration be given to creating a river restoration research centre that would run in partnerships between universities, river trusts and agencies, it was felt that this would lead to a more sustained, community led approach and improvement to the riverine environment.

The need for sustained funding for river restoration was expressed in a few submissions; consequently the question of **sustainability** after the programme period end was raised as an issue.

In terms of **water management research**, it was suggested by a few submissions the need for considering existing research and carrying out supporting longitudinal research to include baselines and pre/post assessments to assess/provide evidence of changes and outcomes, as well as the need for the widespread disseminated and publication of findings.

Generally there was high level support for **wastewater treatment technologies**, with a few specifically mentioning the need for demonstration sites to illustrate best practice. One respondent noted that there are significant capital costs in the upgrade of waste water treatment works and are satisfied this is reflected in the budget allocation. Two submissions recommended the creation of a centre for both renewable energy and the research and development into waste water treatment, consequently promoting clean technology and innovation. The establishment of the common methodologies/**shared solutions** for **green technologies** with regard to water quality was advocated as a basis for strong collaborative action. Innovative approaches and solutions, to include natural solutions to address sewerage, pollution and to treat water, were recommended.

Endorsement was given for a collaborative approach across all three jurisdictions with regard to the design and implementation of projects and the need to share common lessons and approaches.

The achievement of targets relating to **good ecological status** of all **water bodies** is welcomed by most, particularly given Water Framework Directives requirements – as stipulated by a few respondents. One submission noted that emphasises on 'good ecological status' in relation to water is defined by diverse functioning aquatic communities but there is no mention of animal and plant communities, or biodiversity or community function in the actions. A further respondent suggested an action on the maintenance of artificial water bodies to achieve good Ecological Potential could be included, recognising the importance of canals for ecology.

The consultation feedback indicated some discontent regarding: the perceived lack of inclusion relating to Scottish priorities; relevance to the cross-border issues between Ireland

and Scotland; or the scope for full participation by Scottish partners is restricted in how the proposals are currently described; with a few submissions believing that the focus is confined to the two jurisdictions in Ireland rather than across the programme area.

Additional project ideas:

The following lists additional actions suggested by individuals:

- Energy efficiency innovation in the management of water resources.
- Research on improvement of environmental monitoring / benchmarks for measuring environmental quality and the need to maintain a reference database on environmental monitoring.
- Promote actions related to water management, including flood risk management and drought management.
- Development of management models for prediction and discounting at bathing waters. / Signage infrastructure to ensure the public is informed in real time of bathing water quality.
- A wider focus to include the regeneration of canals.
- Actions that support delivery of high quality ecological functioning of waters.
- Waste water treatment technologies must also address diffuse pollution.
- Support research to identify coastal issues that may be damaging to coastal environment habitats e.g. sand movement at beaches and land management activities for restoration of beaches lost as a result of developmental works.
- Support research using short rotation coppice (SRC) willows for bio remediation of waste waters and leachate.
- Actions to support a reduction in carbon emissions from the water industry through investment in sustainable waste water treatment systems   .

2.6 Health

Q. Do you think that this specific objective and the actions to be supported are appropriate to meet the needs of the cross-border region?

60% (n=81) agreed with the objective to improve access to quality cross-border healthcare services.

Figure 2.10: Do you think that 'Health' objective and the actions to be supported are appropriate?
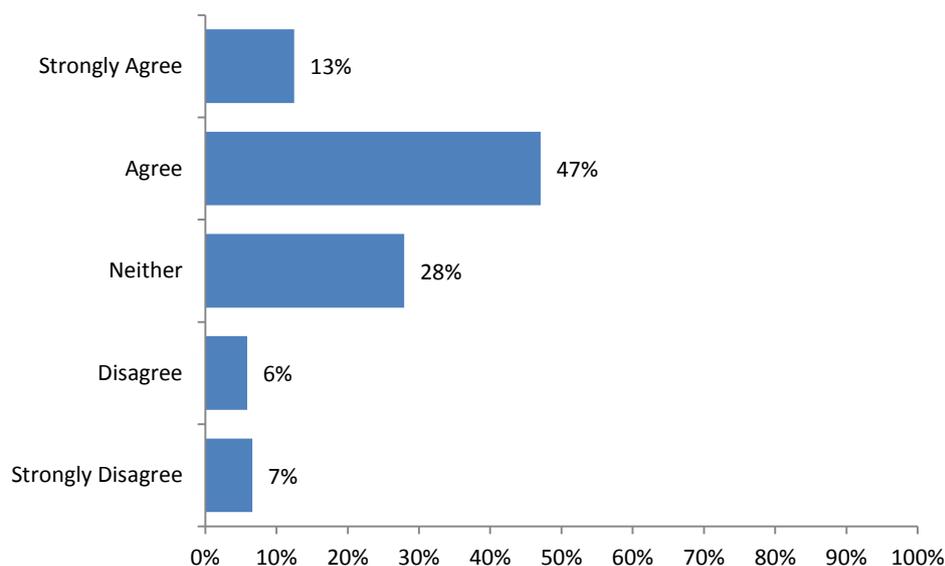
Base: 136 (No answer: 53 | Total: 189)

Of the 17 respondents (13%) that disagreed, 11 (65%) represent community and voluntary sector organisations, four are 'individuals' and the balance from each of the following respondent categories: public sector related and university/college/research.

Q. Do you think that the indicative €53m budget for this objective is appropriate?

40% (n=54) of submissions agreed with the budget allocation, in comparison to only 13% (n=17) that disagreed. Almost half (47%, n=64) neither agreed nor disagreed with the defined €53m budget allocation.

Figure 2.11: Do you think that the indicative €53m budget is appropriate?
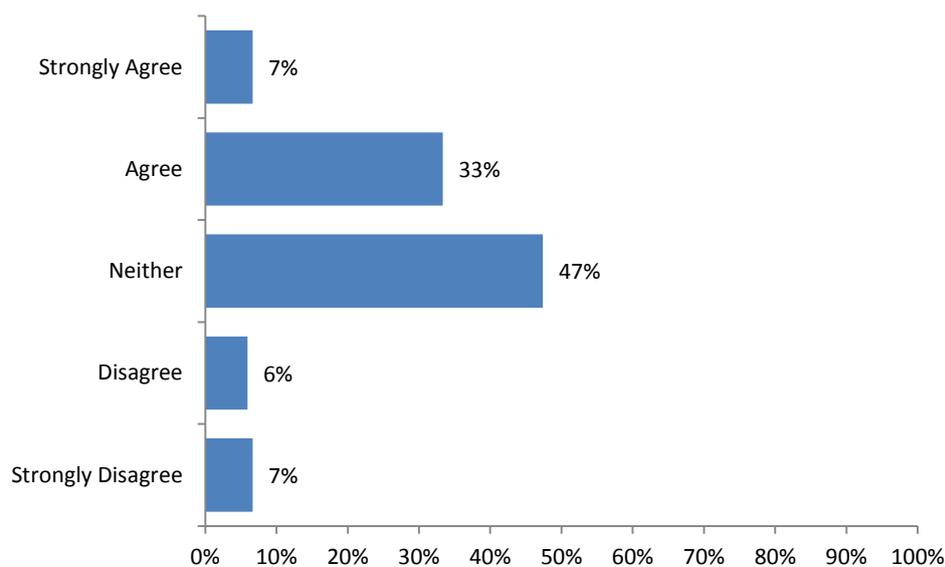
Base: 135 (No answer: 54 | Total: 189)

Of those that **strongly agreed/agreed** with the objective (Figure 2.10), 65% (n=52) of which also strongly agreed/agreed with the budget allocation. 29% (n=23) neither agreed nor disagreed. 7% (n=5) disagreed as they would welcome an increased budget for this theme.

Of those that **strongly disagreed/disagreed** with the objective, 63% (n=10) of which also strongly disagreed/disagreed with the budget allocation.

Q. Please provide any comments you may have on this Health objective for the Programme

Generally there was a high level of support for the actions outlined under the 'Health' objective.

Many submissions endorsed: community-based healthcare services; integrated local response initiatives; addressing health and social inequalities; collaborative, partnership approach to service delivery; the efficient delivery of services; promoting innovation; and a consistent approach to the collection and analysis of data to facilitate learning across the eligible region.

Respondents referred to models of good practice in **tackling health inequalities** and **promoting social inclusion** within specific geographical areas. There was endorsement for projects and health and social care policies that will promote strong linkages across the eligible region. A few concerns were highlighted regarding the practicalities of implementation, given the significant differences in the health systems, and the challenge of developing and applying these models across all three jurisdictions.

Various submissions cited the importance of aligning local community plans, government policies and EU Programmes so that funding can be maximised, providing a sustainable approach to reducing health inequalities and assisting in the development of enhanced health services.

A few respondents strongly recommended a **social inclusion** approach, implemented by local authority partnerships, with a focus on wellness and connected health, urban and rural regeneration, social enterprises and tackling fuel poverty through low carbon actions, with a strong recognition of the **role for the local community** and non-health agencies working with health providers to create health and well-being.

The consultation feedback indicated support for a *'bottom-up'* **approach** to contribute to the health objectives using **cross-border collaboration** between statutory and non-statutory agencies. In reference to healthcare in the community, some submissions relied the benefits of engaging family members as key players in the delivery of healthcare 'in the community' and provision of health support workers to support individuals to make healthy lifestyle choices.

Cross-border health initiatives and the delivery of **joint health clinics**, shared GP facilities and outpatient clinics are welcomed as a way of addressing health inequalities and maximising the use of existing resources and buildings. The intention to invest in treatment clinics in a manner that replaces physical infrastructure with a community based service approach was queried by a few respondents who sought clarification of how these will align with existing health services, noting the importance that actions are additional to existing services.

A submission from a public sector related body referred to the need to **improve access** to cross-border healthcare services including the construction, re-construction and/or modernisation of premises. Other submissions referred to the creation of a number of *'service based'* Healthy Living Centres to be developed in partnership with appropriate bodies and on a cross-border basis as well as provision of a '*framework'* and practical support for health and social care professionals to develop creative and innovative solutions for health.

A few respondents stated that **access** to hospital appointments and the local health centre is an ongoing **concern for many rurally isolated people**, asserting that many rural people feel

that the health service is '*moving away from them'* with more centralised services, rising fuel costs and high levels of poverty and disadvantage. These respondents referred to the **need for new community-based initiatives** which support better health outcomes.

A few respondents cited the *'emerging body of evidence'* that **contact with nature** provides significant benefits for health and well-being, referring to studies and findings connecting health to nature and the benefits to physical and mental health, longevity, quality of life, immunity and social interaction. These respondents stated that actions should be included to promote opportunities for outdoor recreation, including the provision of new walking trails, upgrading of older trails and increased facilities to enjoy outdoor activities including aquatic activity.

Social farming was also mentioned as a means of helping to address inequalities, social inclusion and rural development objectives, referring to evidence that it can deliver personal, social, health and economic benefits, specifying mental health benefits including increased self-esteem, improved mood, increased awareness and increased well-being.

Reference was made that the draft CP places an overemphasis on the medical model and acute treatment of diseases and does not give adequate consideration to actions which would take into account a more **social model of health and preventative interventions** thereby reducing the need for crisis treatment interventions. Another respondent requested greater clarity of the rationale for including healthcare intervention trials and how they address the needs of the population residing in the border region. They also stated that initiatives related to healthcare intervention trials could seek funding from the work programmes related to health in 'Horizon 2020'.

There is strong endorsement for the development of **e-health solutions** amongst respondents, supporting people to live healthy lives, facilitating better communication and decision making. Some submissions mentioned the potential for the application of connected/e-health solutions in the following areas: e-assisted living to support independence for older people; operation of cross-border patient records; videoconferencing and other remote monitoring systems; the use of innovative technology to improve chronic care; and the use of risk stratification to identify vulnerable groups of co-morbidities. Other respondents highlighted that public, private and academic sectors could work together on targeted actions for *'bringing digital technology and innovation to the heart of the health and well-being agenda'*.

A Scotland based organisation noted their particular interest in e-services being shared with multiple providers, referring to parts of the eligible area in Scotland undergoing a redesign of services. Another respondent mentioned an initiative already underway seeking to bring

together all of the key public and private sectors in the health sector from the North and South of Ireland to create a health sector ecosystem to grow the economy and improve health service provision. One University/Research based organisation outlined their extensive experience in cross-border e-health solutions and links with government departments to explore the potential for collaboration within the INTERREG Programme.

A respondent advocated replacing e-health with *'community based and other innovative health and social care services'* asserting that this would provide a better fit with developing Scottish government and NHS Scotland policies seeking to secure more sustainable and effective preventative care.

2.7 Sustainable Transport

Q. Do you think that this specific objective and the actions to be supported are appropriate to meet the needs of the cross-border region?

57% (n=79) agreed that the 'Sustainable Transport' objective and the actions to be supported are appropriate.

Of the 27% (n=38) of submissions that disagreed, 12 submissions (32%) represented organisations within the community and voluntary sector, 11 (29%) were 'individuals', 9 (24%) related to public sector related bodies and the balance evenly distributed between political party/representatives and the private sector.

Further analysis shows slight differences of opinions per jurisdiction:

Ireland: 70% agree, 19% disagree, 11% neither (Total n=37)
Northern Ireland: 53% agree, 27% disagree, 20% neither (Total n=74)
Scotland: 48% agree, 38% disagree, 14% neither (Total n=29)

Figure 2.12: Do you think that the 'Sustainable Transport' objective and the actions to be supported are appropriate?
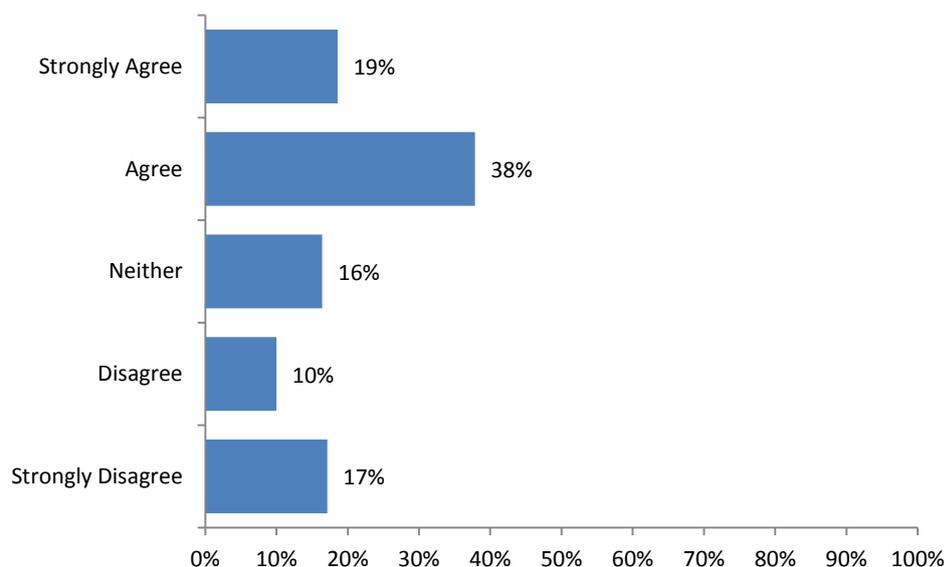
Base: 140 (No answer: 49 | Total: 189)

Q. Do you think that the indicative €40m budget for this objective is appropriate?

40% (n=54) agreed with the €40m budget allocation for the 'Sustainable Transport' objective, whilst 30% (n=40) neither agreed nor disagreed and a further 30% (n=41) disagreed.

Figure 2.13: Do you think that the indicative €40m budget is appropriate?
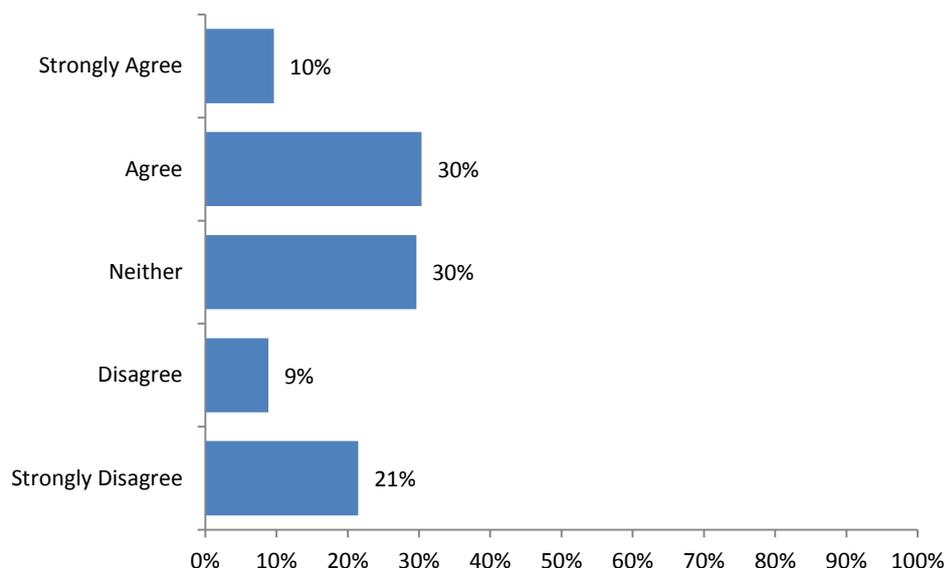
Base: 135 (No answer: 54 | Total: 189)

Of those that **strongly agreed/agreed** with the objective (Figure 2.12), 68% (n=52) also strongly agreed/agreed with the budget allocation. 17% (n=13) disagreed, promoting an increased level of funding due to *'the extensive size of the eligible area and the potential costs associated with developing a comprehensive cross-border network'*.

Of those that **strongly disagreed/disagreed**, 71% (n=27) also strongly disagreed/disagreed with the budget allocation. 22% (n=8) neither agreed nor disagreed

Q. Please provide any comments you may have on this Sustainable Transport objective for the Programme

Overall respondents were supportive of the specific objective *to improve the environmentally friendly transport infrastructure in the region to promote the utilisation of low carbon transportation*.

Submissions welcomed the environmental benefits that will be realised through more efficient and sustainable transport solutions.

A few public sector related organisations mentioned the potential to support and complement departmental efforts to develop **sustainable transport infrastructure** across the eligible area, referring to engagement with counterparts in other jurisdictions and the alignment with government policy.

Other respondents articulated support for more effective cross-border commuter structures; citing the following potential benefits: increase cross-border trade; enhance competitiveness of businesses; attract investment to provincial towns; reduce travel times – resulting in lower carbon emissions; address the need of rural populations to access affordable forms of public transport; supporting rural connectivity and the rural economy; and promoting sustainable cross-border and regional mobility. A number of respondents endorsed funding strategic greenway projects linking Northern Ireland and the Republic of Ireland, specifically referencing the potential of the 'Narrow Water Bridge' project to meet such objectives.

There was general consensus for the creation of **multi-modal transport hubs** as a means of enhancing sustainable cross-border travel and facilitating low carbon transportation in the cross-border region. One respondent referred to a transport hub as a catalyst and platform for the development of a linked network of interoperable electric vehicle infrastructure, others referring to localised transport programmes and proposed new railway/transport hubs.

Inclusion of marine and air transport were cited as being important forms of multi-modal transport, a respondent referring to their critical importance to reach remote or rural areas, contrary to this, other respondents highlighted that airport infrastructure did not meet the objective of low-carbon transport. One respondent promoted the view that creation of multi-modal transport hubs could be advanced by funding the development of cycle networks with a significant number of respondents being in strong support for the **creation of cycle networks**, with a few citing that this will help to underpin previous investment in rural tourism and rural community development initiatives.

Respondents welcomed support for cross-border cycle networks as an opportunity to further develop **'Greenway Networks'** referring to their contribution to the increased use of sustainable modes of transport for work and recreation. The promotion of cycling was strongly advocated as a means of promoting mental and physical health and well-being for local communities, as well as enhancing offerings for domestic and inbound tourism, contributing to positive economic impacts. A few respondents mentioned walking, maritime and inland waterway transport to be included in addition to cycle networks.

In general respondents were supportive of the use of **electric vehicles** stating that infrastructure improvements would encourage greater usage of this form of transport.

Promoting the use of electric vehicles by **public agencies** was supported. The possibility of offering subsidies to authorities for the purchase of such vehicles was welcomed. Submissions from a few public-sector related organisations referred to the *'measure seeming to be supporting Central Government activity and the subsidy for the purchase of electric vehicles'* stating that this would not appear to provide additionality. A few respondents suggested that subsides should not be limited to public agencies and should be extended to the private sector to encourage the use of new modes of transport and to help meet sustainable transport targets.

The use of electric vehicles received some negative feedback from a number of respondents, referring to infrequent use of existing charging points and the underestimation of the significant amount of **infrastructure** still required, others remarked that the existing infrastructure is under-used as the technology needs to develop to extend the driving range of these cars leading to an increased level of interest in this form of transport.

Others mentioned that there are alternative fuel solutions available to meet the objective and they would prefer to see the term '**low carbon vehicles**' being used in the objective.

2.8 Section 75 Considerations – INTERREG

Q. Do you agree with the Section 75 screening decision reached by the SEUPB with regards to the INTERREG Programme?

A positive response was received, with 90% (n=70) of submissions agreeing with the Section 75 screening process and the decision reached by SEUPB for the INTERREG programme.

Figure 2.14: Do you agree with the Section 75 screening decisions reached by SEUPB?
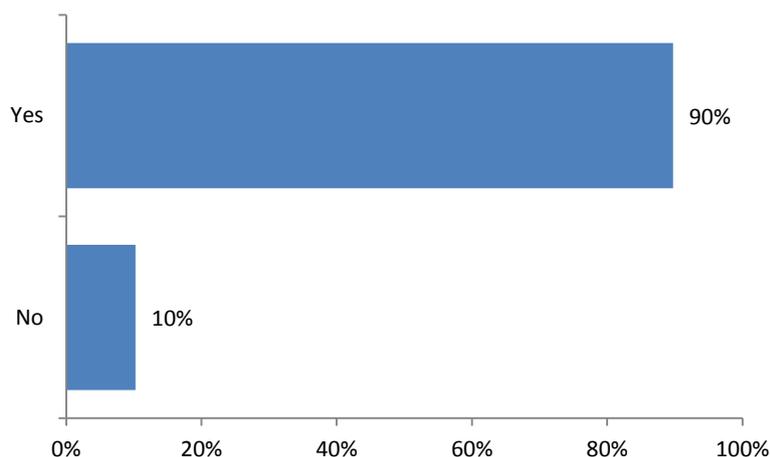
Base: 78 (No answer: 111 | Total: 189)

Q. Do you have any comments in relation to the Section 75 screening process carried out by the SEUPB?

Of those that provided comment, most regarded the screening process as necessary and agreed with the findings. The requirement to promote equality of opportunity and good relations throughout the application and implementation process is welcomed. The need to be '*cognisant of the equalities frameworks in all three jurisdictions*' was highlighted by a public sector related organisation.

The screening concluded that there were minor, positive impacts across four of the nine Section 75 grounds (race/ethnic origin, age, disability, dependency). It found that there were neutral impacts on sexual orientation, marital status, men and women generally, political opinion and religious belief, hence the programme should not be subject to a further EQIA.

There were however some concerns referred to by a few respondents, to include: the need for EQIA and Rural Proofing of programmes being implemented in order to assess the impact of commissioning decisions; concern that the Irish language community, which includes people of all ages, denominations and beliefs, are being marginalised and that this has not been taken into consideration during the screening process.

A submission from a public-sector related body noted the neutral impact recorded in relation to sexual orientation, stating that cognisance needs to be taken to register a more positive impact in relation to this group.

2.9   Strategic   Environmental   Assessment   –   INTERREG

Q.   Does the SEA for the INTERREG Programme cover all of the relevant information?

Strong support was expressed that SEAs for the INTERREG programme cover all the relevant information, with 88% (n=67) agreeing with this statement.

Figure 2.15: Does the SEA cover all of the relevant information?
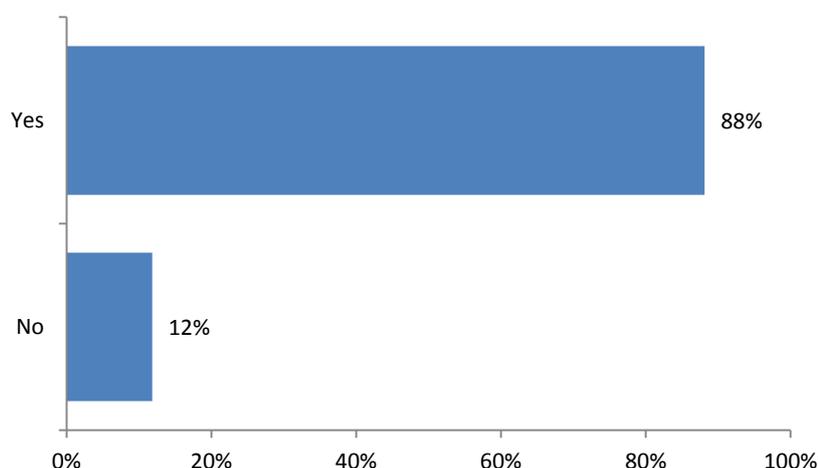
Base: 76 (No answer: 113 | Total: 189)

Q.   Do you have any comments in relation to the SEA for the INTERREG Programme?

Although widely positive, a few points have been raised from representatives based in each jurisdiction.

A Northern Ireland based public-sector body stated that one of the critical aspects identified in the Strategic Environmental Assessments (SEA) is that the region has not met the objectives and targets of the Habitats Directive, Birds Directive and Water Framework Directive, representing a challenge for local authorities in the future.

A Scotland based public-sector body whilst considering that the SEA covers the most current topics, stated that the assessment appeared to have a disjointed rather than integrated

approach remarking that *'in particular the information on the Scottish part of the programme area reads like a bolt on'*.

A Republic of Ireland public sector related body mentioned that baseline data was more Northern Ireland focused, providing *'greater extent and depth'*. They also cited a few accuracy issues, calling into question the robustness and accuracy of data from all jurisdictions.

Part 3: PEACE IV

3.1 Introduction

This section of the report details the results of the second consultation (*carried out from 03 June 2014 to 29 July 2014*) which sought the views from the general public and other key stakeholders on any aspect of the draft PEACE Cooperation Programme (CP), the Section 75 Considerations and the Strategic Environmental Assessments (SEAs).

Consultation Respondents – PEACE

All stakeholders were encouraged to respond to the consultation through the SEUPB website or by written submission; with 117 PEACE-specific responses received, in addition to a further 115 responses covering both the PEACE and INTERREG Programmes (i.e. a total of 232 responses relating to PEACE).

The responses received are from a range of organisations, with the highest number submitted from the community/voluntary sector (40%), followed by public sector related organisations (19%) and individuals (18%).

Figure 3.1: Consultation Responses by type of Organisation

Legend:
- Community/Voluntary
- Environmental Org.
- Government Dept.
- Political Party / Representative
- Private Sector
- Public Related Sector
- University/College/Research
- Youth Org.
- Individuals
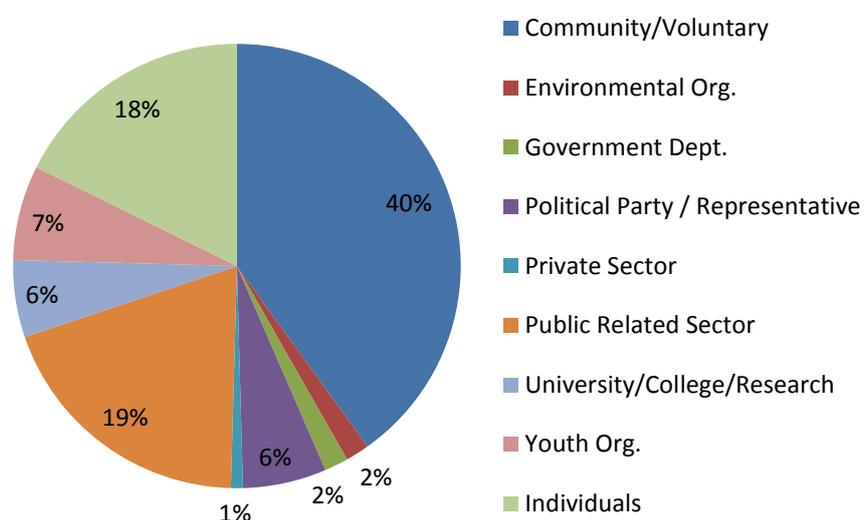
Base: 232

The statistics presented in Section 3.2 and Section 3.3 relate to submissions completed using the structured questionnaire (n=**196**). In cases where organisations/individuals submitted a response in letter format (n=36), these are considered within the overall qualitative analysis.

3.2 Shared Education

Q. Do you think that this specific objective and the actions to be supported are appropriate to meet the needs of the cross-border region?

Over half (54%, n=91) of submissions received indicated their support for the inclusion of shared education as one of the specific objectives of PEACE IV, agreeing that activities will promote sharing and collaboration and will contribute to enhanced educational and societal outcomes. Those in support of this objective mainly represent community/voluntary sector (n=31) and public sector related organisations (n=22) and 'individuals' (n=19).

Figure 3.2: Do you think that the 'Shared Education' objective and the actions to be supported are appropriate?
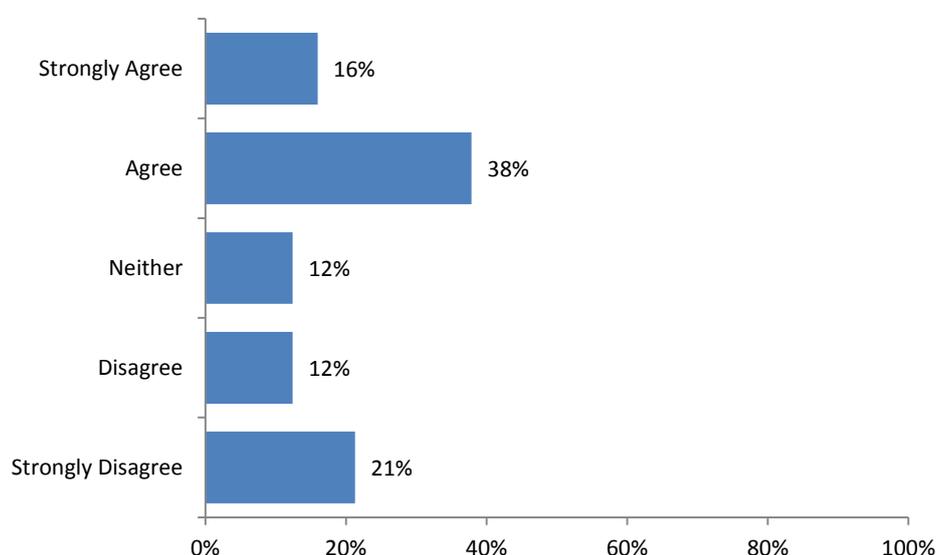
Base: 169 (No answer: 27 | Total: 196)

Approximately one-third (33%, n=57) of submissions did not agree with the inclusion of 'Shared Education' as one of the specific objectives. These submissions are mainly from organisations representing the community/voluntary sector (n=29), as well as 'individuals' (n=16) and political party representatives (n=9).

Respondents felt that education is a statutory responsibility and, as such, should be funded by relevant departments and not under the PEACE Programme. Issues were raised with regard to possible duplication with existing departmental programmes and policies. A number of submissions also reported that the focus should be on programmes which address legacy issues, barriers to a cohesive society and promote conflict resolution and reconciliation.

Q. Do you think that the indicative €45m allocated budget for this objective is appropriate?

42% (n=70) of submissions agreed that the €45m budget allocation for 'Shared Education' is appropriate, compared to 32% that disagreed.

Figure 3.3: Do you think that the indicative €45m budget is appropriate?
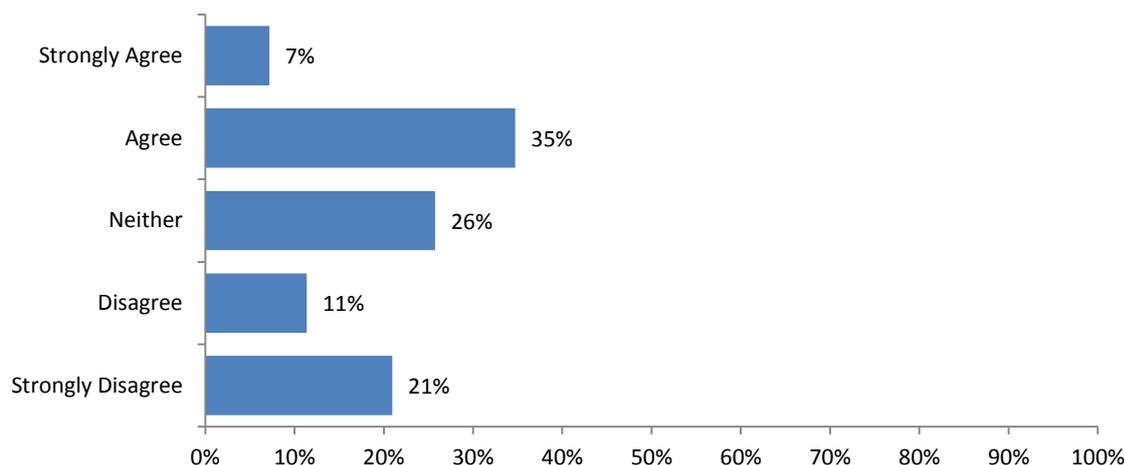
Base: 167 (No answer: 29 | Total: 196)

Of those that **strongly agreed/agreed** with the inclusion of 'Shared Education' as a specific objective of the PEACE Programme (Figure 3.1), 72% also strongly agreed/agreed with the budget allocation. Those that disagreed felt that a higher budget should be allocated.

Of those that **strongly disagreed /disagreed** with the inclusion of 'Shared Education', 92% also strongly disagreed /disagreed with the budget allocation.

Q. Please provide any comments you may have on the Shared Education objective for the Programme

Many submissions stated that shared education initiatives require **departmental support** to drive forward and to aid future sustainability of collaboration through educational structures. The need for complementarity with the department of education's shared education targets and CRED Programme was also noted.

Taking account of **good practice** from existing shared education initiatives was suggested as a means of achieving greater value for money. Creating a central repository of resources and widespread dissemination of good practice was also suggested.

A few submissions from 'public sector related' organisations recommended that shared education initiatives should be developed in partnership with local authorities and peace partnerships to ensure complementarity with local initiatives and with proposed projects under the 'Children and Young People' objective.

A number of submissions stated that the shared education objective appears to be limited in scope, focusing on schools from different sectors, rather than also considering the integrated and third-level education sectors. Some submissions requested clarity on the eligibility of the integrated sector for grant aid under this objective. These respondents felt that **integrated education** should be included, as sharing should not be limited to 'between schools' but also 'within schools'. With regard to third-level education providers, it was felt college/university is often the first experience for students to experience shared education and as such supports and activities need to be put in place to encourage cross-community interaction.

Engaging in **meaningful cross-border interaction** was also advocated by a few submissions as a driver to promote the ethos of shared education.

A number of submissions commented on using sports, arts and culture, IT, 'play' and language as a basis for sharing – and highlighted the importance of having subjects which are **linked to educational attainment** and **outcomes**. Meaningful and **sustained engagement** was advocated as a way of developing long lasting relationships, attitudinal change and reconciliation. Some also proposed that shared education could be extended to **informal education and childcare settings** and to include youth organisations and those who work with children who are disengaged with education.

A few submissions cited that young people should have the opportunity to learn about cultural differences to contribute towards increased tolerance and understanding. The needs of **minority groups** should be considered in the context of shared education. It was suggested that beneficiaries have the opportunity to engage with representatives from communities which experience prejudice to raise awareness of issues and to encourage greater understanding and mutual respect.

Training and professional development was recommended by some respondents as a means of supporting teachers/educational practitioners to prepare and deliver shared classes and events within a culturally diverse environment. As parents are the key influencers of children, the need to encompass **parental support programmes** is also recommended, as part of a whole-school, whole-community approach to shared education. It was also suggested that schools should be promoted and used as a community hub where resources can be extended to the wider community, providing opportunities for teachers, parents and the wider local community to interact. Involving the community in all aspects of the development of

shared education initiatives is believed as the optimum approach which will result in sustainable relationships.

Some submissions asserted that projects should be targeted towards areas most affected by the conflict and which continue to experience division and where projects will contribute to meeting significant PEACE outcomes and impacts.

There was a query from one respondent regarding whether shared education campuses fit under this theme or under the 'Shared Spaces and Services' theme. Related to this point, was the need to provide clarity regarding the types of applications expected under each theme, to avoid overlap and to ensure that applicants direct their application efforts to the most relevant theme.

3.3 Children and Young People

Q: Do you think that this specific objective and the actions to be supported are appropriate to meet the needs of the cross-border region?

Strong acknowledgement and support was expressed for the inclusion of Children and Young people as a specific objective within PEACE IV, with 58% (n=99) of submissions agreeing that the objective and the actions to be supported are appropriate.

Figure 3.4: Do you think that the 'Children & Young People' objective and the actions to be supported are appropriate?
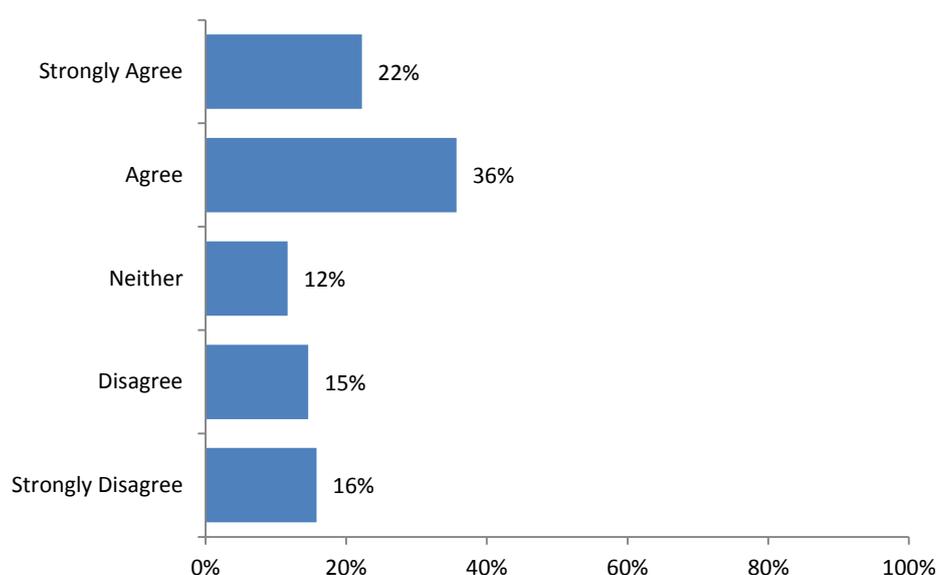
Base: 171 (No answer: 25 | Total: 196)

However, 31% (n=52) disagreed, largely due to concerns of duplication with existing government initiatives and discontent that PEACE funding will be used to support actions which are regarded as the responsibility of central and local government. These submissions also emphasised the need to focus on addressing legacy issues and on sustainable peace building interventions.

Contrary to this, others supportive of the objective believe that by supporting youth based cross-community activities will reduce anti-social and sectarian based behaviour and as such meets the criteria for PEACE funding.

Q: Do you think that the indicative €50m (€20m of which will be delivered via local authority-led Peace Action Plans) allocated budget for this objective is appropriate?

42% (n=68) of submissions agreed that the €50m budget allocation for 'Children and Young People' is appropriate, whilst 36% disagreed with the specified budget. Public Sector related organisations in particular welcomed that a proportion of the budget will be allocated through local authority-led action plans to ensure that areas of local need are targeted.

Figure 3.5: Do you think that the indicative €50m budget is appropriate?
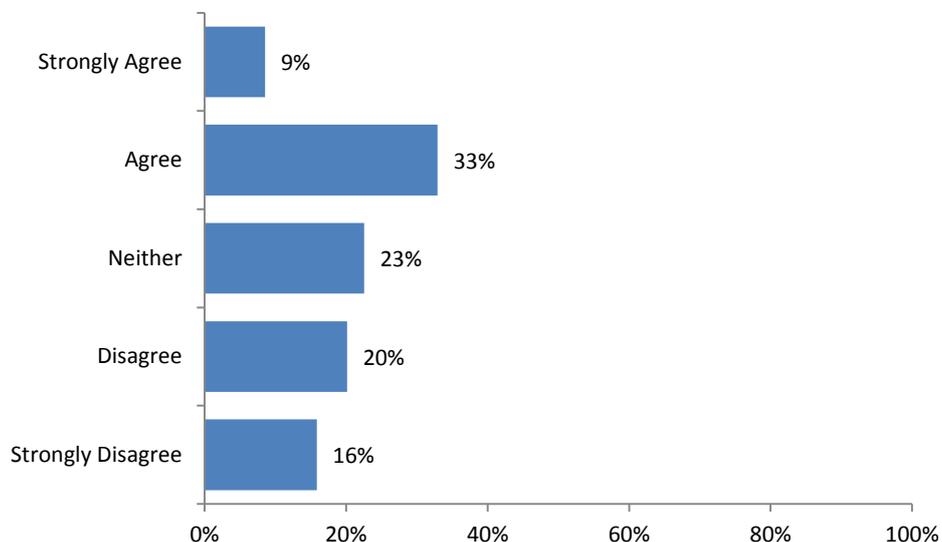
Base: 164 (No answer: 32 | Total: 196)

Of those that **strongly agreed/agreed** with the inclusion of 'Children and Young People' as a specific objective of the PEACE Programme (Figure 3.4), 67% also strongly agreed/agreed with the budget allocation. Those that disagreed (14%) felt that a higher budget should be allocated. The remaining submissions 'neither agreed nor disagreed'.

Of those that **strongly disagreed /disagreed** with the inclusion of 'Children and Young People', 91% also strongly disagreed /disagreed with the budget allocation.

Q: Please provide any comments you may have on the Children and Young People objective for the Programme

Many submissions welcome the focus on children and young people and investment in youth programmes to facilitate access to the labour market. Equipping young people with the skills and attitudes was regarded as a way of building a more peaceful and prosperous society.

To be effective and to ensure complementarity with other local and regional initiatives, a number of submissions stated that relevant organisations must work together, such as the Youth Sector, Education Providers, Local Authorities and Peace Partnerships.

A few submissions stated that cognisance of existing best practice should be considered and the need to focus on child-centred interventions that have proven to develop good relations.

Cross-community and intercultural programme targeting young people in extra-curricular content are welcomed. Although, a few submissions raised concerns that there is only one action referencing a cross-border dimension, expressing the need that this should be sufficiently emphasised in the final drafting of the CP.

Some submissions highlighted the need to engage in long-term initiatives involving meaningful and sustained engagement to generate lasting peace-building outcomes. Actions supporting parents were also recommended as a means of ensuring sustainable outcomes.

Activities which increase the capacity and leadership skills of young people as 'agents for change' were advocated. Involving young people in politics and empowering them to 'have a voice' will contribute to on-going reconciliation. The promotion of peer mentoring and volunteering initiatives will have a positive impact on young people's attitudes and employment prospects.

Providing support and training to build capacity and social reconciliation within and between communities where the youth sector infrastructure is weak was recommended by a few submissions, as well as the need to engage young people in community youth work.

Although many welcomed the actions to be supported under this theme, a number of respondents highlighted discontent that the actions proposed did not explicitly address issues of sectarianism, the legacy of the conflict and trans-generational trauma, as well as racism and anti-social behaviour.

For some, the focus on support and developing skills for NEETs is welcomed as a means of enhancing employment prospects. However, rather than a specific focus on NEETS, a number of submissions stated that funding should be directed to those most affected by the conflict as the overriding criteria. Following on from this, there was a general agreement for the need to

target those living in divided communities where the impact of the conflict continues to be experienced and areas of greatest deprivation.

To strengthen the outcomes under this objective, a few submissions advocated targeting support towards disaffected youths and those that may be attracted to return to violence. Preventative actions through early intervention strategies should be funded, targeting at risk young people and those at risk of becoming NEET.

A few submissions stated that those who are looked after / in care or leaving care should be a priority grouping for employment interventions. Others specifically mentioned the need for training and support for young people with disabilities and those who care for family members.

Discontent was expressed regarding the lack of focus on 'children' in the action listed under this theme. These submissions promoted the need for early childhood peace interventions, to positively influence attitudes and behaviours in formative years. These respondents expressed the need to redress the imbalance towards an equal focus on 'children' as well as 'young people'.

A number of submissions offered the view that funding should be directed towards training of those who work with children and young people in order to increase sustainability of initiatives. Commitment towards cross-border professional development programmes is also welcomed.

3.4 Shared Spaces and Services

Q: Do you think that this specific objective and the actions to be supported are appropriate to meet the needs of the cross-border region?

55% (n=96) of submissions articulated support for the 'Shared Spaces and Services' objective and associated actions. Many submissions welcomed the creation of shared spaces in urban and in particular rural and border areas and the focus on removing visible and invisible barriers between communities.

Figure 3.6: Do you think that the 'Shared Spaces and Services' objective and the actions to be supported are appropriate?
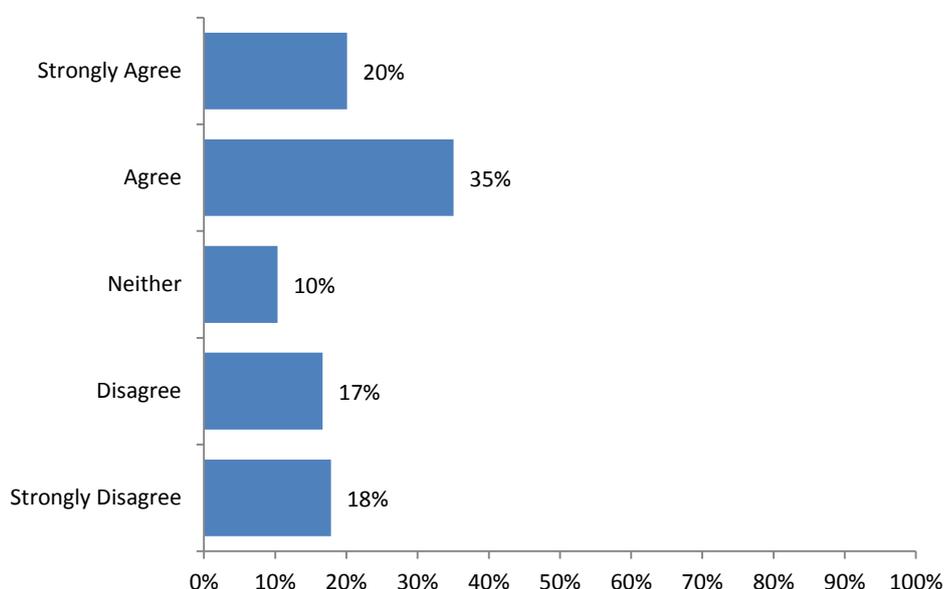
Base: 174 (No answer: 22 | Total: 196)

35% (n=60) of submissions did not support this objective, asserting that creating shared spaces is not about developing iconic schemes but should be focused on changing attitudes and developing relationships between communities in order to foster good relations and uptake of existing community spaces, facilities and services.

Q: Do you think that the indicative €90m (€20m of which will be delivered via local authority led Peace Action Plans) allocated budget for this objective is appropriate?

There was a relatively even split with regard to those that agree and those that disagree with the budget allocation for 'Shared Spaces and Services', with 41% (n=67) of submissions agreeing that the €90m budget allocation is appropriate, whilst 42% disagreed with the specified budget.

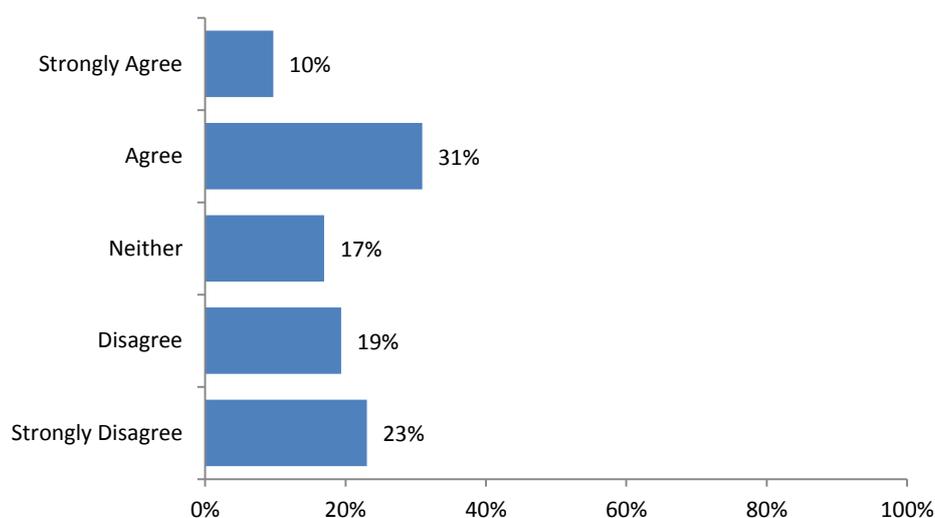**Figure 3.7: Do you think that the indicative €90m budget is appropriate?**

Base: 165 (No answer: 31 | Total: 196)

Of those that **strongly agreed/agreed** with the inclusion of 'Shared Spaces and Services' as a specific objective of the PEACE Programme (Figure 3.6), 69% also strongly agreed/agreed with the budget allocation. Those that disagreed (15%) felt that a higher budget should be allocated. The remaining submissions 'neither agreed nor disagreed'.

Of those that **strongly disagreed /disagreed** with the inclusion of 'Shared Spaces and Services', 91% also strongly disagreed /disagreed with the budget allocation.

Mixed views were expressed regarding the allocation of funding, with some stating that €90m was not sufficient, particularly as the CP noted that the majority of funding will be allocated to five transformative capital projects, therefore perceiving that funds will be limited for smaller urban and rural projects.

Contrary to this, others felt that the allocation was too high and that funding should be redirected to the Civil Society theme. Focus should be on communities not capital builds / social investment and tacking deprivation, poverty, employment

Public Sector related organisations in particular welcomed that a proportion of the budget will be allocated through local authority-led action plans to ensure that areas of local need are targeted. Some submissions endorsed raising the level of funding to local authorities to enhance the development of community led initiatives, asserting that many capital schemes will become the responsibility of local authorities and therefore planning requires input from local government.

A few respondents questioned how the budget will be divided across council areas and that a central fund for regional applications would be preferred.

Q: Please provide any comments you may have on the Shared Spaces and Services objective for the Programme

The need for strategic planning of schemes was endorsed to maximise cross-community access to shared spaces and resources. Many expressed the view that projects should be rigorously planned and developed for and with the community. It was cited that centrally involving local people in the planning process will result in the greatest impact, leading to shared ownership of spaces and services and ultimately the sustainability of schemes. In particular, ongoing engagement with interface communities was recommended.

Protocol development programmes are therefore welcomed as a means of facilitating collaboration between local people and places. Furthermore, the inclusion of delivery through local authority led PEACE action plans will provide opportunities for local community involvement in the identification and development of shared spaces and services.

Support and acknowledgment was given with regard to programmes designed to encourage sustained levels of shared usage within shared spaces and to ensure that public spaces are respectful and welcoming to all, with one submission stating that *'investment in shared space should bring tangible outcomes and not simply aesthetic benefits and/or ultimate use by one section of society'*.

Using shared spaces for sport, outdoor play, displaying community art and cross-community festivals was suggested. Interventions to promote community safety, reducing tensions and levels of sectarian and racially based division were highlighted as key projects in the development of shared spaces.

A number of submissions stated that there should be a move away from funding 'iconic schemes', as was the case in PEACE III, to smaller local interfaces in urban and rural areas. It was also noted that investment should be made in existing community infrastructure and buildings.

A few submissions suggested that funding be provided for large capital projects such as a Trauma and Research centre. Related to this point was reference to the need for services related to trauma training, counselling and alternative therapies to address mental health and post-traumatic stress and related disorders.

In terms of shared services to address the trauma related needs of Victims and Survivors, some endorsed this and welcomed targeting this sector, asserting that funding should complement that provided by the new Victim and Survivor Service in Northern Ireland. Others felt that this allocation would duplicate existing services now in place in Northern Ireland, but recognised that this service is not in place in the border counties. A stronger focus on cross-border services along the border corridor was specifically recommended by a few submissions.

Discontent was expressed by some submissions regarding the lack of actions to help deal with the past and the legacy of the conflict. Furthermore, some submissions recommended the inclusion of projects which bring diverse groups together in dialogue. A few submissions also expressed concern with the absence of actions targeting political ex-prisoners and their families.

3.5 Building Positive Relations at a Local Level

Q: Do you think that this specific objective and the actions to be supported are appropriate to meet the needs of the cross-border region?

In the draft CP, this objective was referenced as 'Civil Society'. As the term 'Civil Society' largely applies only to third sector organisations, the name of the objective has now been changed to **Building Positive Relations at a Local Level** as this better reflects the work programme which will involve local authorities, community and voluntary organisations, business and trade unions and other statutory bodies.

There was a strong acknowledgement and endorsement for the inclusion of this objective within the PEACE programme, with 63% (n=102) agreeing with the actions to be supported.

Figure 3.8: Do you think that the 'Building Positive Relations at a Local Level' objective and the actions to be supported are appropriate?
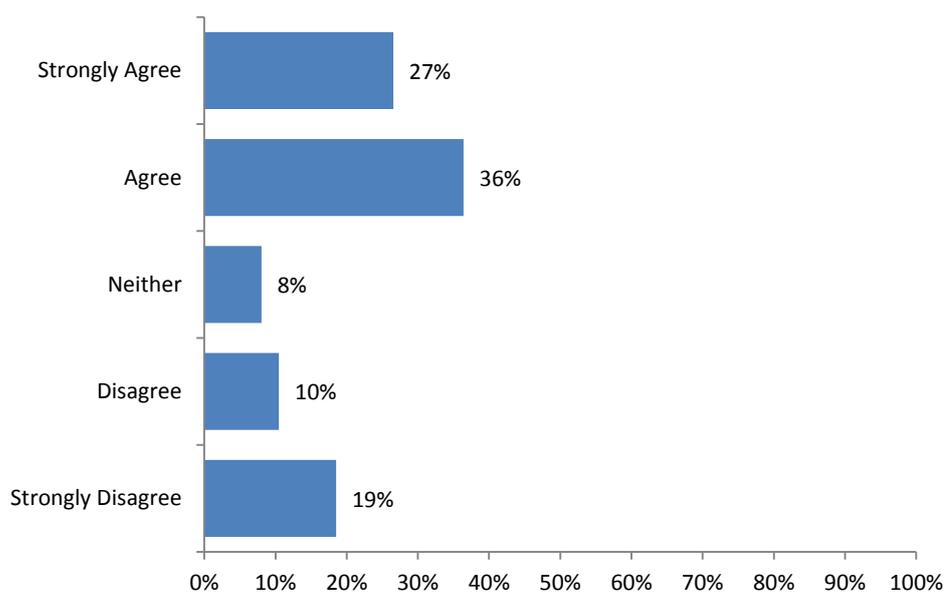
Base: 162 (No answer: 34 | Total: 196)

29% (n=47) of submissions did not support this objective, mainly due to the discontent regarding the absence of key target groups; the perceived lack of a focus on dealing with the past and key legacy issues; preference for the inclusion of regional based projects; and the need for a greater emphasis on cross-border interventions.

Q: Do you think that the indicative €30m allocated budget for this objective is appropriate? (It is proposed that the full €30m will be delivered via local authority-led Peace Action Plans)?

40% (n=63) of submissions agreed that the €30m budget allocation for 'Building Positive Relations at a Local Level' is appropriate, whilst 45% disagreed with the specified budget.

Figure 3.9: Do you think that the indicative €30m budget is appropriate?
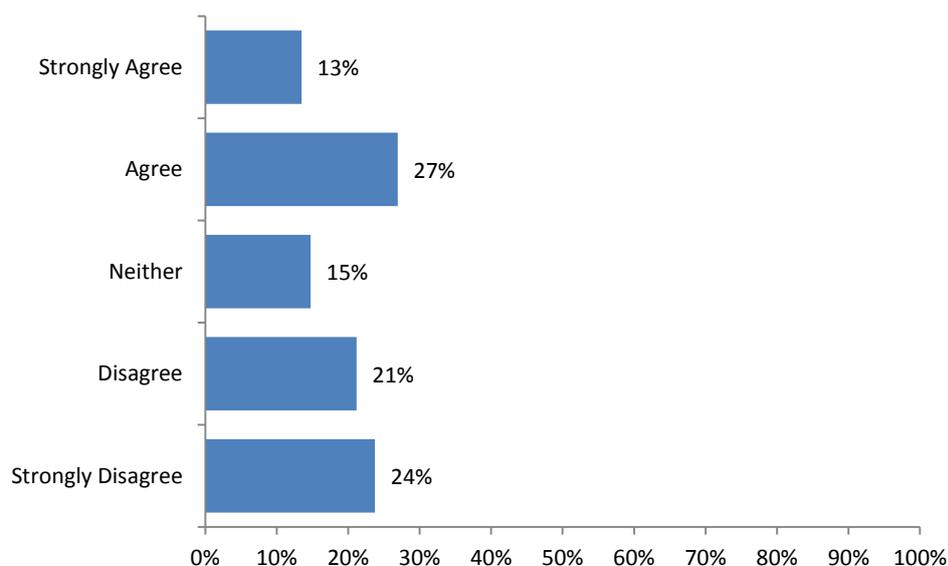
Base: 156 (No answer: 40 | Total: 196)

Of those that **strongly agreed/agreed** with the inclusion of 'Building Positive Relations at a Local Level' as a specific objective of the PEACE Programme (Figure 3.8), 65% also strongly agreed/agreed with the budget allocation. Those that disagreed (21%) felt that a higher budget should be allocated. The remaining submissions 'neither agreed nor disagreed'.

Of those that **strongly disagreed /disagreed** with the 'Building Positive Relations at a Local Level' objective and associated actions, 100% also strongly disagreed /disagreed with the budget allocation.

Q: Please provide any comments you may have on the Building Positive Relations at a Local Level objective for the Programme

Many submissions indicated that this aspect should be the main focus of the programme and as such should be allocated a greater proportion of the overall budget. Submissions welcomed social development activities and endorsed projects that promote and celebrate cultural diversity.

Programmes that will build cohesive communities, reduce division and polarisation and will promote inclusion are welcomed.

The need to avoid duplication of existing support and thereby ensuring additionality was noted as a key aspect in a number of submissions. Learning from PEACE III to garner best practice programmes and materials was also suggested by some as a means of ensuring effective and efficient use of funding.

A number of submissions also welcome actions to engage individuals and communities not previously involved in peace building activities. Related to this point was the need to engage in single identity work, which was advocated by a few respondents.

Promoting greater mutual understanding through upcoming centenary commemorations was recommended by a few respondents, emphasising that these events need not be mutually exclusive and can provide a way to share history.

A few submissions highlighted the need for increased and meaningful cross-border co-operation. It was also highlighted that a proportion of activity should have a clear cross-border remit. Furthermore, these submissions noted that there is a need to reference cross-border interventions and relevant strategies in Ireland as well as Northern Ireland within the final drafting of the CP.

Concern was expressed in some of the submissions that the budget will be channelled solely through local authorities, questioning how the budget will be divided across council areas and if organisations are eligible to apply for funding in all council areas. A few respondents commented that councils will act as gatekeepers to the fund and may be subject to an element of political influence, therefore expressing the need for a regional-wide approach. Concerns were also raised regarding the new local authority structures in terms of the time needed to embed changes which may delay decisions regarding PEACE funding.

These submissions recommended that regional bodies should have an opportunity to deliver projects, to build on existing expertise and to ensure that areas of greatest need are targeted on a regional and cross-border basis. It was recommended by these respondents that a proportion of this objective be ring-fenced for regional projects.

A partnership approach is strongly endorsed to include engagement from local partnerships and grassroots community organisations which represent all in the community, including marginalised groups. A few submissions commented on the need to build on exiting partnership structures. Submissions from community and voluntary sector organisations and research related organisations asserted that they are equally well placed to develop local partnerships and welcomed the opportunity to collaborate with local authorities to develop such partnerships.

Many submissions advocated the need to apportion funding to target groups to ensure that funds are distributed to those most affected by the conflict, with a focus on legacy issues addressing inequality, combating sectarianism and racism. In particular, victims and survivors, women, young people, ethnic minorities and political ex-prisoners were mentioned as key target groups. In addition, a few respondents asserted the need to support minority languages and, in particular build awareness of and respect for the Irish language. It was felt that this approach would maximise the impact of the PEACE programme.

3.6 Section 75 Considerations – PEACE

Q: Do you agree with the Section 75 screening decision reached by the SEUPB with regards to the PEACE Programme?

A positive response was received, with 87% of submissions agreeing with the Section 75 screening process and the decision reached by SEUPB for the PEACE programme.

Figure 3.10: Do you agree with the Section 75 screening decisions reached by SEUPB?
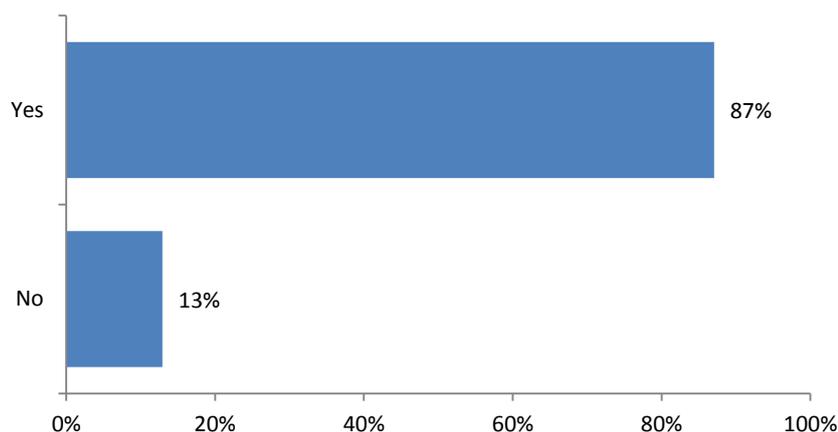
Base: 116 (No answer: 80 | Total: 196)

Q: Do you have any comments in relation to the Section 75 screening process or decisions reached by the SEUPB?

Of those that provided comment, most regarded that the screening process is necessary and agreed with the findings. The requirement to promote equality of opportunity and good relations throughout the application and implementation process is welcomed.

The positive impacts recorded during the screening process across four of the nine Section 75 grounds (religious belief; political opinion; race/ethnic origin; and age) are welcomed. However there is concern about the neutral impact recorded in relation to sexual orientation and minor impacts on gender and disability.

A number of submissions asserted that political ex-prisoners be included as a target group for funding, as has been the case in the previous PEACE programme. A few suggested the need to focus on families directly affected by the conflict, those injured by the conflict and suffering from mental ill-health and/or physical disabilities; and gender specific models of recovery from the conflict. A few submissions also emphasised the need to focus on the Irish language community, which are considered to be marginalised.

A universal approach to data collection and screening was suggested as a means of better programme targeting. A few stated that data collection exercises have been challenging as 0ften participants find the process of completing monitoring forms relating to personal information invasive.

Outreach and engagement strategies were suggested as a means of gaining representation across Section 75 groupings.

3.7 Strategic Environmental Assessment – PEACE

Q: Does the SEA for the PEACE Programme cover all of the relevant information?

Strong support was expressed that SEAs for the PEACE programme cover all the relevant information, with 88% (n=90) agreeing with this statement.

Figure 3.11: Does the SEA cover all of the relevant information?
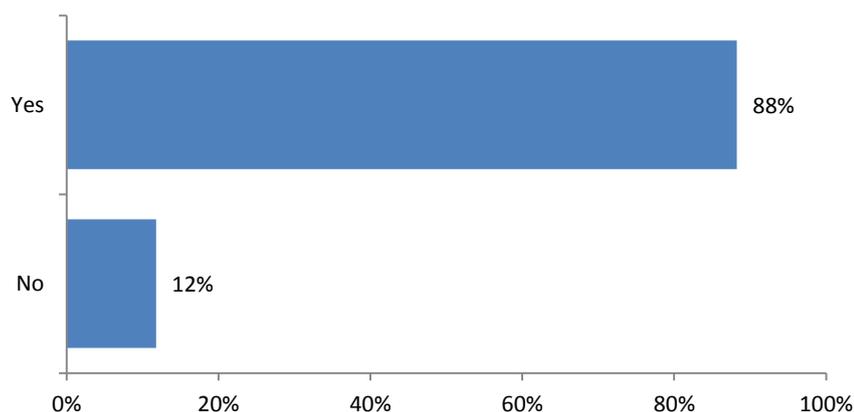
Base: 102 (No answer: 94 | Total: 196)

Q: Do you have any comments in relation to the SEA for the PEACE Programme?

Due to the positivity with regard to SEA, limited feedback was provided by respondents.

Points raised by individual submissions include:

- The Environmental Working Group should be comprised of relevant stakeholders/experts.
- Measures will be implemented to mitigate possible negative impacts that may be associated with the capital shared space proposals.

- Environmental projects provide local communities with the opportunity to improve and maintain shared areas and keep them free of ant-social behaviour.

Two submissions commented that 'environmental' projects and themes should not detract from the core focus and goals of the PEACE Programme in terms of addressing issues of division and sectarianism.

Of the 12 submissions which stated 'no' the SEA does not cover all of the relevant information, only two provided additional comments regarding further issues to be addressed i.e.

- The SEA should result in a more environmentally-sustainable plan – as highly complex, cumulative effects such as climate change and habitat loss can be more effectively addressed in strategic plans than in the context of individual projects. The need to review progress towards this goal at each stage was also regarded as essential.
- Aspects and detail of landscape planning to be considered.

Part 4: Programme Administration

4.1 Introduction

The responses of the initial public consultation highlighted a number of concerns about the administrative burden placed upon beneficiaries accessing funding under the PEACE and INTERREG Programmes. Concerns were also articulated on the long processing times associated with project assessment and approval. Overall, there was a generally held consensus that the levels of bureaucracy within the programmes needed to be reduced.

In a direct response to the concerns raised and to the opportunities presented in the regulations, the Managing Authority has agreed with the Member States on a number of administrative simplifications. The second consultation (*03 June 2014 to 29 July 2014)* sought feedback from the general public and other key stakeholders on the proposed administrative simplifications and whether proposals are adequate in terms of reducing the administration burden for beneficiaries.

The statistics presented in Section 4.2 and Section 4.3 relate to submissions completed using the structured questionnaire (n=**284**). In cases where organisations/individuals submitted a response in letter format (n=49), these are considered within the qualitative analysis.

4.2 Application, Assessment & Approval of Projects

Q. Do you think that these proposals are adequate in terms of reducing the administrative burden for beneficiaries?

Over half (52%, n=101) of submissions agreed that the proposals were adequate, over one-third (34%, n=67) neither agreed nor disagreed and a minority (14%, n=27) disagreed.

Figure 4.1: Do you think these proposals are adequate?
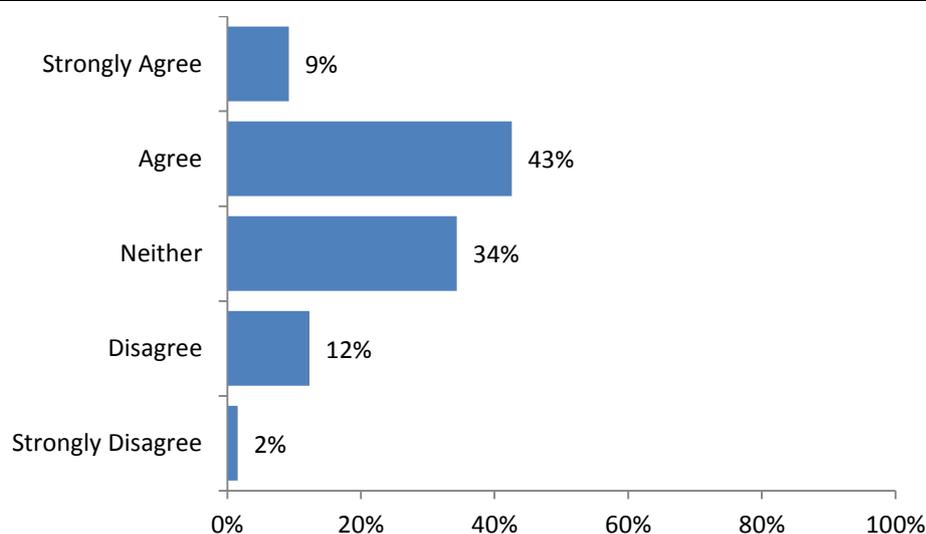
Base: 195 (No answer: 89 | Total: 284)

Q. Please comment on any of the specific measures in relation to reducing the administrative burden on beneficiaries

Widespread support is evident within submissions that the outlined measures will contribute to reducing the administration burden experienced in previous programmes.

136 submissions commented on specific measures in relation to reducing the administrative burden, a summary of which is presented below:

Application process:

Submissions were largely positive, indicating that pre-application support in the form of seminars and workshops will help potential applicants assess the eligibility of their project prior to applying for funding.

Various support mechanism were suggested, for example: developmental support for low capacity groups; pre-application training workshops for applicants in cooperation with councils and partnership/cross-border groups in order to ensure that potential applicants are fully aware of the programmes requirements; and provision of facilitators who will work with groups to formulate applications and help to manage the administration of projects.

A more streamlined approach to the application process is very much welcomed, with the introduction of a two-stage application, helping to better manage applicant expectation and '*speed up'* the overall application assessment timetable as well as helping to avoid lengthy, detailed proposals in stage one.

Respondents indicated that SEUPB need to find a balance in ensuring that the first stage application collects enough information, whilst not being overly onerous to applicants, to allow a decision to be made on whether or not a project idea is worth submitting to a second stage application.

A few respondents noted their apprehensions that a two stage process may protract the process further; whilst another submission felt that the stage one may not give a project due consideration.

Endorsement was given for a more user-friendly application form to help reduce the administration burden.

Information on calls for grant aid & processing times for applications:

The rolling 24 month programme of calls of applications is broadly welcomed. Furthermore, the reduction in times for processing applications is strongly supported.

Confusion was evident in some submissions, with respondents querying whether the stage one was included in the estimate of 40 weeks. It was recommended that there should be *'an open transparent criteria'* outlining, at programme commencement, how the maximum of 40 weeks approval process will be achieved.

Some submissions articulated the view that the proposed processing time of 40 weeks, although a significant improvement, is still too long and should be reduced further. The timescale remains an administrative and financial barrier to prospective applicants.The target of 20 and 26 weeks was cited in a number of submissions and regarded as an optimum timescale in line with other EU Programmes.

Initiatives to reduce the administrative burden are supported and various organisations have expressed their desire to work with the SEUPB and other departments to further this aim, emphasising the importance of complying with EU and national policies to ensure accountability when allocating public funds.

Assessment:

Some submissions reported a lack of information regarding the assessment process in the consultation document, thereby preventing them from providing an adequate response.

The proposed focus on results and impact when assessing applications was positively received. Selection criteria '*primarily focused on the peace and reconciliation needs and achievability of peace and reconciliation results'* is supported.

Cost effectiveness was identified as one dimension of the assessment process, as well as the importance of being appropriately balanced against considerations of '*potential impact, innovation and contribution to programme objectives'*.

The requirement for coordination between departments and SEUPB is endorsed to ensure good communication and a significant level of constructive dialogue to progress applications and reach final recommendation. Other commentary specified that consultation with local authorities should be undertaken as part of the assessment process to ensure '*synergy with any local development framework'*.

A number of respondents asserted that economic appraisals do not add value to the assessment process as they are perceived to be resource-intensive, onerous and often lead to lengthy and sometimes over complicated decision-making, further adding that economic appraisals are not required under EU Regulations.

The need for proportionality of effort was asserted, and a few suggested raising the threshold for full independent economic appraisals of projects.

Feedback to unsuccessful applicants and the provision of training and workshops was also suggested as being potentially useful for future applications.

Allocation of funding / Steering Committee approval:

Submissions strongly endorsed that there will be no additional approval processes post-Steering Committee, a few submission stating that this was in line with other EU Programmes.

Whilst submissions agreed with the composition of the Steering Committee, to include representatives from Member States, relevant departments, social partners and access to technical experts, it was emphasised that there should be representative of programme stakeholders, to include input from grass-root representatives.

It was suggested promoters should be given an opportunity to present their project to the Steering Committee '*as they are best placed to answer questions*'.

One respondent highlighted that sufficient time should be given to the Steering Committee members to fully consider project assessment paperwork also suggesting that papers for meetings should be circulated four weeks in advance of the meeting.

Match-funding:

Concerns were raised that it will be difficult for smaller groups to meet the requirements of match-funding, which may prove as a deterrent and barrier to participation.

A few community/voluntary based organisations stated that the requirement of match funding would have a detrimental effect on their ability to deliver projects and would not be in line with the programmes principle of inclusion. A number of these groups iterated that they required 100% funding to allow low capacity groups and organisations to participate.

In-kind contributions are welcomed by all respondents who specifically mentioned this aspect, supporting the opportunity to secure match funding from a range of sources. The ability to use staff time as a non-cash contribution was also welcomed.

Two submissions from Scottish based public sector organisations required clarification of the definition of 'in-kind' contributions, since these are not eligible in domestic Scottish Structural fund programmes.

Submissions from some public service related bodies were concerned that the 15% contribution would put unnecessary budgetary pressure on them especially since the level of match funding has not been factored into current/medium financial plans. The need for local authorities to be supplied with timely information regarding budget allocations was recommended to allow them to factor match-funding into future budgets.

INTERREG submissions which had prior experience of providing match funding welcomed the increase in the intervention rate to 85% (from 75%), one noting the continuing constraints on public sector budgets.

4.3 Project Implementation

Q. Do you think that these proposals are adequate in terms of reducing the administrative burden for beneficiaries?

62% (n=113) of submissions agreed that the proposals outlined to improve project implementation were adequate, another 32% (n=58) neither agreeing nor disagreeing. A minority (6%, n=12) disagreed. These trends were mirrored when the data was analysed according to jurisdiction, Northern Ireland, Ireland and Scotland.

Figure 4.2: Do you think these proposals are adequate?
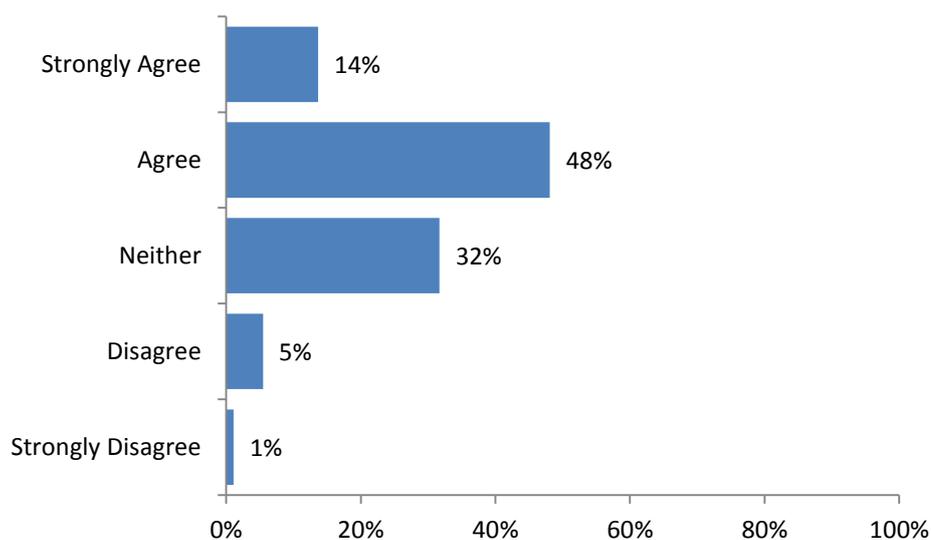
Base: 183 (No answer: 101 | Total: 284)

Q. Please comment on any of the specific measures in relations to reducing the administrative burden on beneficiaries

Submissions were largely positive and welcomed measures that would reduce the administration burden experienced in previous programmes.

101 respondents commented on specific measures in relation to reducing the administrative burden, a summary of which is presented.

Harmonisation of rules:

Limited feedback was given regarding harmonisation of rules, suggesting that respondents did not have an issue with this approach. Those that commented, welcomed the decision, and a few indicated that the common rules will assist in the verification of expenditure. One respondent stated that the harmonisation of the Northern Ireland expenditure rules for managing public money would further simplify the rules for payment of European funding.

Project duration:

Many submissions welcomed the proposed duration of the project of up to seven years. This approach will allow projects to focus on longer-term impacts and negate the need to re-apply during the programming period.

A few submissions indicated that funding will not *'hit the ground'* until 2016 hence shortening the time available to deliver programmes. Others stated that they would lose momentum and capacity to deliver programmes due to the gap and delay in funding which is '*not conducive to retaining sustainable capacity in successful*' EU funded projects.

Monitoring:

The consultation feedback indicated that many are supportive of the reduction in the number of indicators within a letter of offer. However many submissions stipulated their concern that payment will be linked to high level outputs, with a financial penalty incurred if these are not met. These submissions commented that changing external factors, outside of the project's control, may impact on the extent to which outputs are achieved. A few submissions also reported that risk-taking will be avoided in favour of 'safer projects' in order to meet targets. Submissions also noted that this approach does not take into account the achievement of 'softer outcomes'.

One submission stated that the proposed indicators in the draft CP are limited, emphasising the need to link indicators directly to the '*intervention's theory of change and capture meaningful change in underlying attitudes and behaviours'*, however it was acknowledged that indicators are under development.

Budget structure

Respondents stated that the simplified budget structure, with a limited number of categories of eligible expenditure, is welcomed as it will provide the organisations with greater operational flexibility' with not having to seek pre-approval for changes to sub budget lines. One organisation noted that it enables them to '*respond to the needs of a changing environment and ability to address unforeseen changes post application'* Another organisation mentioned that the new budget structure will lead to a more straight forward administration, enabling organisations to proceed with procurement without undue delay.

Simplified costs:

Respondents referred to the '*significant scope'* the use of simplified costs would have to streamline administration by reducing paperwork and bureaucracy. Others welcomed the proposal for the use of a flat rate overhead eliminating the need for vouching of invoices.

Some submissions requested more details on how the unit cost methodology would be implemented and administered and how it would work within particular organisations, noting that it was not suitable to all. A few submissions cited that whilst proposals under unit costs are welcomed in terms of fixed costs, the method was deemed unsuitable for variable costs such as staff costs and consequently would be challenging for groups/projects which have labour intensive activities.

Of the few submissions that referred to lump sum payments, there was a balance between welcoming it and being cautious, one highlighting that the use of lump sum payments has potential risks involved such as claw back from failure to deliver results.

Lead partners:

Submissions from council representatives support the continuing need to reduce the administrative burden for final beneficiaries.

A number of submissions requested further clarification relating to the funding of regional networks and the provision of lead partners.

One submission endorsed the resource allocation model, which helps small local area based organisations access the programme, highlighting that this approach ensures that the administrative burden rests with the lead partner. Others referred to the need for a significant role for local delivery agents and the importance of streamlining administrative procedures across all partnership areas and regions.

Verification:

Mixed opinions are evident with regard to verification. Whilst respondents acknowledged that a sampling methodology will reduce administration, there are a number of concerns regarding linking verification to outputs and results. Furthermore, in cases where outputs are not realised until the end of the programming period, submissions queried whether advance payments would be made to allow projects to progress. They had concerns for potential cash flow difficulties if they are '*required to 'bank roll' the programme'* until the full realisation of outputs.

With regard to risk based sampling, one submission asserted that the absence of a formal Risk Appetite Framework and guidance would potentially limit the scope and ambition of possible outcomes also noting the need to consider the promoter's '*risk appetite'*.

'If guidance is not provided on the levels of risk that are legitimate for Project Promoters to take, or more likely, not seizing opportunities due to a perception that taking an additional risk is discouraged, then project performance/ potential outcomes will not be maximised'

Clarification is also sought on methods of collecting data and how outputs/results will be verified.

The need for lead partners to be involved in the design and testing of any new database was emphasised by one respondent, highlighting that appropriate training be provided in a timely manner. Others mentioned the need for improved functionality of the database and for it to be operational from the start of the funding period.

Letter of offer:

There was widespread support relating to the simplification of the letter of offer (LoO) to include only three criteria. It was believed that this will enhance the focus of projects and facilitate greater ease of monitoring of LoO requirements.

With regard to letters of offer in a single currently (Euro), this was largely accepted by respondents and is in line with all other EU Programmes.

Twelve submissions specifically referred the letter of offer being in Euros, ten of which were opposed to this proposal – representing public sector related organisations based in Northern Ireland. These submissions asserted that this will be a financial risk to projects due to fluctuation in exchange rates – many of whom stated that groups will not be in a position to absorb market fluctuations. Others recommended the need for clear guidelines in relation to exchange rates to be issued if projects are to properly budget and monitor their allocation.

E-Cohesion:

Limited feedback was given regarding e-cohesion, suggesting that respondents did not have an issue with this approach. Electronic documentation and archiving was cited by one organisation as a way of advancing current systems.

Other comments relating to programme administration:

A few respondents remarked the need for clear guidelines to be issued from the outset of the programme, any changes to be consulted upon and adequate support and training provided. A few other comments are listed below;

- It is recommended that a cap is placed on the amount that a capital project can receive under each stream.

- SEUPB and partners (including social partners) need to give greater emphasis and have greater resources available to secure truly cross-border projects including contributory and observer partners in project development.

Appendices

Appendix 1 - List of Consultation Events

Date	Event	Attendees
Thursday 12 June 2014	Carrickdale Hotel, Dundalk	74
Tuesday 17 June 2014	City Hotel, Londonderry / Derry	97
Friday 20 June 2014	Jurys Inn, Glasgow	46
Tuesday 24 June 2014	Stormont Hotel, Belfast	135
Thursday 26 June 2014	Cavan Crystal Hotel, Cavan	108
Friday 27 June 2014	Inverness College, Inverness	26
Monday 7 July 2014	CRC Event, Dunsilly Hotel, Antrim	42
Tuesday 8 July 2014	NICVA Event, Belfast	28
Wednesday 9 July 2014	RCN Event, Cookstown	28
	Total	**584**

Appendix 2 - List of Consultation Respondents

Consultation Respondents:

Please note that 333 responses were received. Some organisations submitted more than one response but their organisation is only listed once.

List of Consultation Respondents
1. Active Communities Network
2. Agri-Food and Biosciences Institute (AFBI)
3. Agroterritori Fundació Privada
4. An Ciste Infheistíochta Gaeilge
5. An Eochair
6. An Gaeláras
7. Antrim and Newtownabbey District Council
8. Ardoyne Youth Club
9. Argyll And Bute Council
10. Armagh, Banbridge and Craigavon Cluster Councils
11. Arts Council Of Northern Ireland
12. Arts Ekta
13. Ballinamore Drama Festival
14. Ballymena Borough Council
15. Belfast Community Circus School
16. BMW Regional Assembly
17. Bogside and Brandywell Initiative
18. Bord Gáis Networks
19. Border Counties Childhood Network
20. Border Emergency Management Working Group
21. Building Relationships in Communities (BRIC)
22. Cairde Strabane Republican Ex-Prisoners Group
23. Camlough Community Association
24. CAN PEACE III Partnership
25. Carers Association
26. Carers Trust
27. Carrickfergus Borough Council
28. CASE and QUESTOR
29. Causeway Coast And Glens Heritage Trust
30. Cavan Community Forum Public Participation Network
31. Cavan County Council, Local Enterprise Office and Innovation and Technology Centre
32. Cavan Peace Partnership
33. Centre For Connected Health & Social Care
34. Centre for Cross Border Studies
35. Charter For Northern Ireland
36. Children In Northern Ireland
37. Clann Naofa Boxing Academy

List of Consultation Respondents

38.	Clinton International Summer School
39.	Clones Failte
40.	Coillte Forest
41.	Coimhearsnachd Bharraidh Agus Bhatarsaidh Ltd
42.	Coiste na nIarchimí
43.	Coleraine Borough Council
44.	Colleges Northern Ireland
45.	COMET INTERREG Partnership
46.	Commission for Victims and Survivors NI
47.	Committee for Education
48.	Committee For Regional Development
49.	Community Change
50.	Community Relations Council
51.	Community Restorative Justice Newry Armagh
52.	Conradh na Gaeilge
53.	Cooley Environmental & Health Group
54.	Co-operation and Working Together Partnership (CAWT)
55.	Cooperation Ireland
56.	Creggan Neighbourhood Partnership
57.	Cross Border Emergency Management Working Group
58.	Cunamh
59.	DAFNE User Advisory Group
60.	DEME Blue Energy NV
61.	Department For Education
62.	Department for Regional Development (DRD)
63.	Department of Agriculture and Rural Development (DARD)
64.	Department of Arts, Heritage and Gaeltacht
65.	Department of Communications Energy and Natural Resources (DCENR)
66.	Department of Enterprise Trade and Investment (DETI)
67.	Department of Environment Communication and Local Government (DECLG)
68.	Department of Jobs Enterprise and Innovation (DJEI)
69.	Department of Transport, Tourism and Sport
70.	Derry City & Strabane District Council
71.	Derry City and Strabane Council
72.	Derry Healthy Cities Group
73.	Destined Ltd
74.	Disability Federation Ireland
75.	Diverse City Community Partnership
76.	Donegal Community Workers Co-operation
77.	Donegal County Council
78.	Donegal Education and Training Board
79.	Donegal Peace III Partnership
80.	Donegal Youth Service
81.	Dove House Community Trust

List of Consultation Respondents
82. Down District Council
83. DP Energy
84. Drumshanbo Skatepark Committee
85. Dundalk Institute of Technology
86. E and I Engineering Ltd
87. Early Years
88. East Border Region Biodiversity Working Group
89. East Border Region Ltd
90. Edinburgh Centre For Carbon Innovation
91. Éirí Na Gréine Consultation Reponse
92. Employers For Childcare Charitable Group
93. Energy & Climate Change Directorate (Scottish Govt)
94. Enterprise Northern Ireland
95. Environment & Marine Group (DOE)
96. European Regions Network for the application of Communications Technology ERNACT-EEIG
97. Ex-Prisoners Interpretative Centre
98. Failte Abhaile
99. Fair Head Tidal Energy Park Ltd
100. Farney Community Development Group Ltd
101. Fermanagh District Council
102. Fermanagh Trust
103. Foras na Gaeilge
104. Forestry Commission Scotland
105. Forthspring InterCommunity Group
106. Geological Society NI Regional Group
107. Glen Dimplex
108. Grow It Yourself
109. Habitat Northern Ireland
110. Hands Of History
111. Health Service Executive Sligo/Leitrim/West Cavan
112. Healthy Living Centres Alliance
113. Highland Council
114. Iarchimí Ard Mhacha Theas
115. IBIS Partnership
116. Ilex
117. Include Youth
118. Inishowen Basking Shark Study Group
119. Inishowen Development Partnership
120. Integrated Education Fund
121. International Centre for Local and Regional Development
122. International School For Peace Studies
123. Into The West
124. Irish Central Border Area Network (ICBAN)
125. Irish Football Association

List of Consultation Respondents
126. Irish Rugby Football Union (IRFU)
127. Irish Water
128. Iveagh Centre
129. Junior Achievement Ireland
130. Lá Nua
131. Leafair Community Association
132. Leitrim County Council
133. Leitrim Integrated Development Company
134. Lifestart Foundation
135. Lisburn PSP Community Network
136. Lisburn-Castlereagh PEACEIII Partnership
137. Lisnafin Ardnalee Trust Cross Community Development Association
138. Loughs Agency And Irish Lights Commission
139. Louth Childrens Services Committee
140. Louth County Council
141. Maiden Of The Mournes Festival
142. Marble Arch Caves Geopark
143. Marine Tourism And Angling Development Partnership
144. Meath County Council
145. Melmount East Bank Estates Community Associations Forum
146. Mid East Antrim District Council
147. Mid Ulster DC
148. Monaghan County Council
149. Monaghan Peace III Partnership
150. Moyle District Council
151. Muirhevnamor Community Council
152. Narrow Water Bridge Action Group
153. National Trails
154. Nerve Centre
155. Newry And Mourne DC
156. Newry Rainbow Community
157. NI Association for Mental Health
158. NI Environmental Link
159. Northern Ireland Community and Voluntary Association (NICVA)
160. North Ayrshire Council
161. North Belfast Interface Network
162. North Down Ards Council
163. North Down Ards District Council
164. North Down Borough Council
165. North East Partnership
166. North West Community Network
167. North West PEACE III Partnership
168. North West Region Cross Border Group
169. North West Simon Community & Donegal Homeless Action Team

List of Consultation Respondents

170. Northern Ireland Association for the Care and Resettlement of Offenders (NIACRO)
171. Northern Ireland Children's Enterprise
172. Northern Ireland Community and Voluntary Organisation (NILGA)
173. Northern Ireland Environment Link
174. Northern Ireland Youth Forum
175. NorthPoint Aviation Services
176. Oaklee Trinity Ltd Consultation Ltd
177. Omagh District Council
178. Omagh Forum for Rural Associations
179. Omeath District Development Company & Cooley Peninsula Tourist Office
180. Pat Finucane Centre
181. Playboard
182. Pobal
183. Queens University Belfast
184. Regional Public Health Agency NI
185. Relatives For Justice
186. Resurgam Community Development Trust
187. River and Fisheries Trusts of Scotland (RAFTS)
188. Royal National Institute for Blind People (Northern Ireland & Scotland)
189. Royal Society for the protection of Birds (RSPB)
190. Rural Community Network
191. Rural Development Council
192. School of Agriculture & Food Science (UCD)
193. School Of Biological Sciences (QUB)
194. School of Education, University of Ulster
195. Scotlands Rural College (SRUC)
196. Scottish and Southern Energy (SSE) plc
197. Scottish Centre for Ecology & the Natural Environment
198. Scottish Council for Voluntary Organsiations
199. Scottish Environment Protection Agency
200. Silverbridge Boxing Club
201. Sligo Family Resource Centre
202. Sligo Leitrim and Northern Communities Railway (SLNCR)
203. Sligo Peace And Reconciliation Partnership Committee
204. Smart Eco Hub
205. Smart Grid Ireland
206. Smart Region
207. South Antrim Community Network
208. South Ayrshire Council
209. South East Fermanagh Foundation
210. South Eastern Regional College (SERC)
211. South West College
212. South West PEACE III Partnership
213. Southern Education and Library Board

List of Consultation Respondents
214. Sport Changes Life
215. Start360
216. Strabane District Council
217. Strathclyde Partnership For Transport
218. Tar Abhaile
219. Tar Anall
220. Tar Isteach
221. The Geological Survery of Northern Ireland
222. The Mummers Foundation
223. The National Trust
224. The Neighbourhood Renewal Area Partnership
225. The Northern Ireland Science Park
226. Tides
227. Training for Women (TWN)
228. Triax Neighbourhood Partnership Board
229. Tus Nua
230. Ulster Farmers Union
231. Ulster Gaelic Athletic Association
232. Ulster Wildlife
233. University Of The Highlands And Islands
234. University of Ulster
235. Verbal Arts Centre
236. Voluntary Action Lochaber
237. Warrenpoint Burren Rostrevor Chamber Of Commerce
238. Warrenpoint Heritage Development Committee
239. Waterways Ireland
240. Wave Trauma Centre
241. West of Scotland Colleges Partnership
242. West Of Scotland European Forum
243. Work4U Plus
244. YCNI CRED Group
245. Youth Council for Northern Ireland
246. Youth Initiatives
247. Youth Link
248. Youthnet
249. Political Party / Representatives – x 19
250. Individuals – x 57