

European Anti-Poverty Network (EAPN) Ireland Comments on National Strategic Reference Framework (NSRF) 2007-2013



EAPN Ireland welcomes the opportunity to comment on the Draft NSRF 2007-2013. The NSRF provides an important context and framework for the Structural Fund Operational Programmes (OP) in Ireland for 2007-2013.

1. Participation of Community Organisations

a. Consultation process for the NSRF.

According to Article 28 of the Structural Funds General Regulation the NSRF is to be prepared in line with the partnership principle outlined in Article 11 of the Regulation. This Article states that civil society and non-governmental organisations are to be involved at all stages in the preparation, implementation, monitoring and evaluation of the Structural Funds. We consider that the level of consultation for the NSRF is unacceptable and does not permit proper input from community organisations and other stakeholders. This is despite the fact that page 43 of the draft NSRF states that the NSRF was developed after ‘extensive consultation’.

b. Monitoring structures

The effective participation of community organisations in monitoring and implementation structures for the Structural Funds programmes under the NSRF is essential. This involves a recognition of resource levels in organisations and supporting the capacity of organisations to effectively participate. One of the regular criticisms of NDP Monitoring Committees from 2000-2006 is that they focussed on expenditure and did not provide for proper engagement in relation to implementation or impact.

c. Participation in Implementation

As stated in number 1 above Article 11 of the Structural Fund General Regulation highlights that non-governmental organisations should be involved at all stages of the Structural Fund Process, including implementation. This should be reflected in the NSRF and apply to all Operational Programmes. The reference on page 46 of the draft NSRF under ‘Equality’ to positive benefits of the bottom-up approach taken under the EQUAL Community Initiative highlights the importance of involving anti-poverty groups in the implementation of programmes.

It is essential that community organisations are facilitated in taking a lead on projects and be able to access resources. This should be an element of all Operational Programmes. The Community Strategic Guidelines (CSG) also support a community development approach to addressing urban disadvantage and inequality.

As had been highlighted through previous EU Community Initiatives large grants and the requirement for matching or co-funding are a barrier for many community organisations in accessing EU funding. Chapter 1 of the NSRF states that the approach to be taken to ESF funding will be to involve ‘concentrating the available funding on a very small number of flagship

projects'. The intention of this approach appears to be to fund large projects. If this is so then it will result in the exclusion of smaller organisations, and particularly anti-poverty and social inclusion focused organisations, from being able to access this funding. Smaller grants should be available and with no matching funding requirement in order to ensure that initiatives being developed are as accessible as possible to groups working on the ground with disadvantaged communities and those most removed from the labour market

2. Horizontal Principles

A number of key horizontal principles should be applied to the whole of the NSRF. Key among these are social inclusion, equality. Within the document these are only seen as issues for the ESF OP.

a. Social Inclusion

The Structural Funds are recognised as an important tool for addressing social exclusion. However within the draft NSRF social inclusion as a horizontal principal appears to apply only to the ESF OP and not to the Regional Programmes or the Territorial Programmes, apart from PEACE III. It is extremely important that social inclusion is a horizontal principle across all the Operational Programmes. If this is not done then there is the potential of creating greater inequality and exclusion. Page 10 of the draft NSRF quotes from the Lisbon goal but only includes the first half. The second half is '...capable of sustaining more and better jobs and with greater social cohesion'. It is essential that a balanced approach is taken to achieving the Lisbon goal and that social inclusion has the same priority as economic and environmental goals.

An example of how social inclusion applies to the Regional Operational Programmes is in terms of supporting entrepreneurship. The EQUAL Community Initiative and other policy areas have highlighted that entrepreneurship provides an important route to a job for many people from marginalised groups e.g. Travellers, ex-offenders, women, people from minority groups, etc and that barriers and supports to this need to be addressed. This impacts on how mainstream programmes to address entrepreneurship are developed.

Addressing issues of social exclusion and poverty are also essential to any approach to balanced urban development. The context for this is outlined in the European Commission 2005 Staff Working Paper on *Cohesion Policy and Cities*.

b. Equality

The existence of **equality** as a horizontal principal is important and essential in relation to all grounds recognised under equality legislation. The issues of gender equality and accessibility for disabled people are prioritised by the EU and the document on horizontal principles as needing particular attention. Greater detail is required as to how these are to be monitored and addressed at all stages of the programmes.

All Structural Fund Programmes, and the NSRF itself, **should be equality and poverty proofed** not only to ensure that they do not create greater levels of inequality or poverty but also to identify ways of reducing current levels of inequality and poverty. In some circumstances this may require targeted approaches within mainstream measures e.g. entrepreneurship supports or supports around innovation.

3. Social Inclusion in the European Social Fund Operational Programme

The NSRF highlights that social inclusion is an important element of the ESF OP. The Priority of upskilling the workforce and increasing the participation and activation of groups outside the workforce is welcome.

This is welcome and is consistent with the EU ESF Regulations and the Community Strategic Guidelines (CSG). The strategic framework for the ESF priority names a number of key strategic areas. It is essential that in addressing these issues that there is a focus on those currently excluded from the labour market, including in relation to lifelong learning, and that in focusing on those within the labour market priority is given to those who are low skilled and low paid.

4. Recognition of Geographical Poverty

A number of studies including that carried out by the IPA and Combat Poverty Agency¹ (1995) have highlighted patterns of regional poverty. It is essential that the regional programmes take this into account in the development of the regional programmes and the focus to specific priority actions. Currently the focus of the regional programmes as set out in the draft NSRF and in the regional context (p32) is on economic and infrastructure issues. Not to recognise and address this as part of any programme will lead to increased levels of poverty in areas already identified as having higher levels of poverty.

5. Monitoring Arrangements

The detailed terms of reference for the NSRF Monitoring Committee and its relationship to the proposed Committee on the Coordination of EU Funds as outlined on page 61 need to be clarified to ensure that the NSRF Monitoring Committee can effectively carry out its functions.

Page 13 highlights that measuring outputs as well as expenditure is an important aspect of measuring the effectiveness of Structural Fund Programmes. It is essential that the capacity in measuring the impact of programmes is also developed, including the impact on access to service, training and employment for disadvantaged communities.

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¹ Watson, D., C.T. Whelan, J. Williams and S. Blackwell 2005. Mapping Poverty: National, Regional and County Patterns. Dublin: Institute of Public Administration with the Combat Poverty Agency