



Special EU Programmes Body
Foras Um Chláir Speisialta An AE
Boord O Owre Ocht UE Projects

European Territorial Co-Operation 2014 – 2020

Name: Peter McNaney, Chief Executive
Organisation: Belfast City Council

What questions did you respond to?	Please tick
INTERREG IVA (Q.1.a to Q.4.b inclusive)	✓
PEACE III (Q.5.a to Q.7.b inclusive)	✓
General Questions applicable to both programmes (Q.8.a to Q.12 inclusive)	✓
Additional Comments (Q.13 and Q.14)	✓

Consultation Response Document

28 August – 20 November 2012



Consultation questions for consideration

During this consultation period, we really want to hear your views. Have you been involved in INTERREG or PEACE before? Are you not involved but wonder what it is all about? Or even, if it is the first time you have ever heard of EU funding for cross border co-operation - we want to hear from you!

You should refer to the 'Consultation Information Document' at <http://www.seupb.eu/2014-2020Consultation/keyquestions.aspx> which will provide the background information to assist you with answering the consultation questions.

We are asking a total of 14 questions and in providing your answers, please note the general considerations outlined earlier in Part 2 of the Discussion Document. Some of the questions have sub questions, to help ensure all the key points are addressed. There is no requirement to answer all the questions, please respond only to those questions that you wish to do so. Please use your responses to questions 13 and 14 to make more general comments if you wish to do so.

The SEUPB welcomes early responses so that views, ideas and comments can contribute to ongoing developments and debates during the consultation period. Your response will be published on the SEUPB website unless you specifically request that it should not be published.

This document is available to download from the SEUPB website at: <http://www.seupb.eu/2014-2020Consultation/howtorespond.aspx>

We welcome your response by e-mail to: consultation@seupb.eu

While responses by e-mail are preferred, should you may wish to post it, please send it to:

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2014 -2020 Programmes Consultation

Special EU Programmes Body

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All responses may be subject to release under the SEUPB's Code for Freedom of Information, a copy of which is available on our website at <http://www.seupb.eu/AboutUs/FreedomOfInformation.aspx>

Note: The Comet INTERREG Partnership held a Stakeholders Consultation Workshop in Partnership with the SEUPB on 25 September 2012. A total of 60 delegates attended from the local Government, Education Business, Research, Community and Voluntary Sectors. Their responses to the INTERREG V Consultation questions are detailed below.

INTERREG V Cross-Border Programme

Learning The Lessons From The Current Programme

Q.1.a. If you are currently involved in INTERREG funding, please share your experiences of the impact of the programme on the cross-border region.

From a COMET perspective, the INTERREG IVA experience has been challenging. The 6 COMET Councils namely Belfast, Lisburn, Castlereagh, Carrickfergus, Newtownabbey and North Down came together in 2005, to form a shadow INTERREG IIIA Partnership.

Supported from technical assistance provided by SEUPB, they set out to develop cross border relationships and foster cross border project ideas in anticipation of the INTERREG IVA Programme 2007–2013. Without going into the chronological detail of the Multi Annual Plan evolution and subsequent separate call application system between 2007–2010, it was only by 22 December 2011 that Comet actually received project letters of offer (3). The Comet experience, like all 5 INTERREG partnerships, was one of huge challenge and difficulty given the prolonged and changing application process driven by SEUPB and accountable departments, and also for the following reasons as highlighted during the Consultation Workshop:

- There is a need to decentralise the programme to have more authority and role at the local government partnership level, as was proven successful in INTERREG IIIA;
- This would also greatly reduce the administration burden on SEUPB who currently handle all administrative aspects of the programme;
- From the Comet perspective, it was very difficult to source partners in the cross border region given that;
 - a) Comet does not have a natural synergy with the border region; and
 - b) the border area contiguous partners have been collaborating for over 30 years;
- It is difficult to source partners and source the right partners;
- The programme content should to be more needs driven;
- Accountable departments have made it difficult to get projects to the starting line and a perception of government already delivering in the areas of incubation and SME Development skewed real local need, where micro businesses and geographical areas need extra and targeted investment;
- The programme is often more regulation driven, than needs driven.
- Impact of the INTERREG IVA programme has been limited in the Comet region by way of securing only 3 projects. However, these are of significant value and will make an impact in the medium term within the business and entrepreneurs sectors. There have also been benefits to Comet stakeholders in terms of developing stronger relations with colleagues both in and across the border region which will be critical for going forward into the new ETC programming round.

Q.1.b. Please share with us your views of what works well in the current programme as well as what could be improved.

- The Cross Border INTERREG Partnerships developed stronger collaborative partnerships during this programme resulting in a more coherent approach to;
 - a) Operational issues and standards sharing
 - b) Joint lobbying and positioning
 - c) Project collaboration for the first time
 - d) Profiling the IVA region during Brussels Open Days, in a now annual seminar and networking event
 - e) Collaborative conferences
 - f) Coherent local authority voice
- The partnerships managed to keep stakeholders on board during difficult and challenging programme circumstances with changing goal posts and systems;
- Improvement could be made around
 - a) a devolved role for the local authority groups, a return to the INTERREG IIIA partnership delivery approach;
 - b) allocating one government department as the accountable department for the groups
 - c) involving the groups (as well as NILGA) in the detail of the development of the new programme – Councils know what the local challenges, needs and gaps are, and how to articulate and then address these
 - d) a proper Multi Annual Plan approval system to be introduced at the Programme outset i.e. now agreeing local area cross border strategic plans at the outset and allocating global grants through the Community Led Local Development model.

Q.1.c. If you have not been involved in INTERREG funding, can you please identify any obstacles to your participation and your views on how can these could be addressed?

There were no attendees who had not already been involved in INTERREG and all experienced frustration and disappointment regarding INTERREG IVA due to the previously documented difficulties.

Themes for INTERREG V

Q.2.a What are the problems / issues /opportunities in the cross border area that are best addressed by the new INTERREG V Cross-border Programme? (Please bear in mind the eleven themes outlined in Appendix 2 of the Consultation Information Document)

Problems/Issues/ outlined by COMET Stakeholders:

A. Problems outlined by Comet stakeholders:

- The long and challenging process experienced by the partnership from multi annual planning in 2007 to a new application process to eventual letters of offer Christmas 2011.
- Over robust assessment and economic appraisal process.
- Involvement of different economic assessors in the same match funding government departments.

B. Issues raised by Comet stakeholders:

- Issue raised around opting for themes 1, 3, 4 as priority themes given DETI must choose these for the mainstream ERDF programme and they are likely to be a match funder?
- Issue raised around the need to find a way to address cultural heritage and tourism, which are not addressed in the themes.
- Need to develop a rationale for combining ERDF/ESF and demonstrating complementarity.

C. Opportunities outlined by Comet stakeholders:

- SME development, theme 3 - particularly micro businesses that do not benefit from INI or ITI programmes. Also there is a necessity to integrate tourism into this theme through business development.
- Opportunity for colleges to play a bigger role in development, research and innovation, through creating business clusters, incubation processes and research and innovation initiatives.
- Opportunity to combine ERDF & ESF to undertake capital investment with locally legacy bearing projects and at the same time targeting softer skills and training investment to complement and provide content for new build, e.g. E3 & Forth river projects in Belfast.
- Opportunity to address environmental problems which are not addressed through themes 4, 5, and 6.

Q.2.b In your view, what type of change should the INTERREG V Programme be striving to bring about in relation to these problems / issues / opportunities?

Comet stakeholders made the following comments on general areas for improvement:

- Faster streamlined, more efficient process is required.
- Need clear direction as to who is accountable.
- NI/SEUPB needs to be much less risk averse.
- Local Government is very well placed to be at heart of delivery and to shoulder responsibility.
- A problem with slow delivery of programmes e.g. the Creative Industries Comet CEED project – 4 years to receive LOO.
- Trilateral Projects – more difficult to manage due to participation of 3 sets of partners. Experience shows that is difficult to find Scottish Partners due to match funding.
- To include Dublin as an eligible area would give greater scope to find cross border partners in line with local need.
- Look at all island needs/challenges before deciding on the priorities, e.g. water quality, economic development, investment in places, waste, IT infrastructure quality tourism offer, environmental issues overall.
- Establish DETI & DEL views as potential match funders - should INTERREG be dedicated to the same themes or totally different?
- Finding a balance between EU/legal/statutory rules and the concept of a genuine community impacting programme.

Q.2.c Bearing in mind your answers to 2a and 2b, from the list of thematic objectives in Appendix 2 of the Discussion Document, which 4 objectives should be included in the new programme?

Comet Stakeholders could not reach agreement on 4 themes specifically but have identified and highlighted themes 1, 3, 4, 6 and 8 as being essential for addressing the regional challenges on a cross border basis.

Comet stakeholders were cognisant of the fact that any devolved programme role will have a bearing on where local authorities have competencies to spend – no point in having local plans with priorities where local authorities have no mandate or where there is one area would swallow up the whole allocated local budget. Eg: waste.

Q.2.d What are your views on including a sustainable urban development dimension and / or an integrated territorial investment option? (see Appendix 3 of the Consultation Information Document)

- I. Comet stakeholders were supportive of Sustainable Urban Development but recognise that any focus on it will be dependent on UK support for it ultimately.
- II. There was common agreement around the need for including a strong sustainable urban development dimension given the level of population living in and the assets based in urban areas.
- III. Comet stakeholders prefer a delivery model combining the use of the Integrated Territorial Investment tool for Urban areas along with the Community led local development model for smaller defined areas. The ITI model is preferred by Comet Stakeholders to be delivered through a vehicle of a Joint Committee of the councils with urban territories within the metropolitan area, aligned to the imminent RPA boundaries. The Integrated Territorial Investment and Community Led Local Development delivery models would ensure that future EU funds are administered in a more integrated, efficient and locally responsive way and more effectively meet the structural needs of local communities. A focused, placed-based budgeting approach to the future allocation of EU funding through for example an ITI provides a greater opportunity to align EU funds with local spending plans and other resources available to the councils; ensuring regeneration, economic development and skills funding instruments meet specific needs and generate greater outcome gains. Comet recognises that accountability for future European expenditure will remain with government departments and that an appropriate accountable framework will need to be put in place to underpin any delegation of funds to Comet or other council clusters. Comet would welcome the opportunity to explore with departmental officials how such assurances and accountability can be developed.
- IV. There was also agreement that Greater Belfast and Dublin be formally included in the eligible area to allow the urban centres to develop cross border investments along the Belfast, Newry, and Dundalk, Dublin corridor, around an agreed number of strategic collaborations around economic development, research, environment and ICT. Comet stakeholder recognise that the legislation allows only for this to happen for additional NUTS level 3 regions adjacent to those currently listed. Although this still allows for Dublin to be involved, though with benefits and impacts solely for the fully eligible area excluding Dublin, Comet still believes there are benefits in working with Dublin.

Q.2.e Do you have any cross-border projects in mind that will contribute to bringing about the type of change that you think is necessary within the region?

- Belfast – Dublin Greenway around renewable energy collaboration
- Cross Border Micro Business Collaboration
- Lagan Canal and all Island Waterways

The Comet stakeholders would welcome the opportunity to undertake strategic planning and project development workshops with Newry and Louth in the coming months and Dublin, if there is a political will for inclusion.

Eligible Area

Q.3. What are your views on the eligible area?

Comet stakeholders agreed that the eligible area should be extended to include Greater Belfast, the Belfast – Dublin corridor and Greater Dublin. Both areas are the key economic drivers for the region. Cohesion cannot be delivered without these 2 city regions. Going forward to RPA including the above areas will ease confusion on eligible boundary areas.

Meetings are underway to discuss this sensitive issue and further commentary will be communicated to SEUPB. The COMET INTERREG Partnership recognises the fact that if Dublin were to be included, all investment MUST be within the eligible area which would be a disincentive for Dublin. However Comet still believes there is huge merit in developing the Dublin links and working with Dublin partners to create prosperity and growth along the corridor to strengthen North Dublin and the eligible area.

INTERREG V Delivery Structures

Q.4.a Bearing in mind the limited number of themes, the need for a strategic approach and the need to ensure delivery of bilateral and trilateral projects, what delivery mechanisms do you consider to be appropriate to implement the INTERREG V cross-border programme?

Comet stakeholders prefer a delivery model combining the use of the Integrated Territorial Investment tool for Urban areas along with the Community led local development model for smaller defined areas. The ITI model is preferred by Comet Stakeholders to be delivered through a vehicle of a Joint Committee of the councils with urban territories within the metropolitan area, aligned to the imminent RPA boundaries. The Integrated Territorial Investment and Community Led Local Development delivery models would ensure that future EU funds are administered in a more integrated, efficient and locally responsive way and more effectively meet the structural needs of local communities.

A focused, place-based budgeting approach to the future allocation of EU funding through for example an ITI provides a greater opportunity to align EU funds with local spending plans and other resources available to the councils; ensuring regeneration, economic development and skills funding instruments meet specific needs and generate greater outcome gains. Comet recognises that accountability for future European expenditure will remain with government departments and that an appropriate accountable framework will need to be put in place to underpin any delegation of funds to Comet or other council clusters. Comet would welcome the opportunity to explore with departmental officials how such assurances and accountability can be developed.

Q.4.b What are your views on using the Community Led Local Development approach and / or Joint Action Plans? (as outlined in Appendix 4 of the Consultation Information Document)

Comet stakeholders discussed at length the ITI, JAP and CLLD models and agreed the appropriate models for devolving the programme to grass roots level are the ITI and CLLD models rather than JAP as they would ensure INTERREG V reaches those areas of need through a locally led community based strategy. As in INTERREG IIIA, the de-centralised approach worked well, processes were speedier and financial spend on target.

Comet found the JAP model to be very vague.

Please see more detail at question 2 d.

PEACE IV Programme

Learning The Lessons From The Current Programme

Q.5.a If you are currently involved in PEACE III Programme please comment on/share your experiences of the impact of the programme?

Belfast City Council's Good Relations Partnership has successfully delivered a range of projects under Phase 1 of the Belfast PEACE III Plan as can be seen from the following summary of the 2009-2011 programming period.

Indicator	Target	Actual	Commentary
Programmes developed and implemented.	1	20	These were programmes led by Belfast City Council and NI Housing Executive. and Belfast Health Trust
Organisations in receipt of grant aid	22	51	A number of organisations led 2 projects in Phase 1.
Participants	2,500	36,297	Includes 15,733 from Festivals programming
of which: Male		17,786	
of which: Female		18,511	
Events that address sectarianism or racism or deal with conflict resolution	74	227	More events held than originally anticipated due to increased number of projects.
Reports/films or other deliverables	73	132	More reports/ booklets and short films produced than originally anticipated due to increased number of projects.
Footfall in city centre at key retail locations after receiving support	-	62%	62% of those surveyed never having been into the city centre on the 12th/ 13th July before.
Environmental improvement schemes on arterial routes	4	4	Northumberland St; Ormeau Bridge; Bridge End; Carlisle Circus
Area networks promoting community cohesion	2	2	Inner East & Inner South
Network to approve mediation resource	1	1	Network of Accredited Mediation Practitioners
Discussion on changing the physical appearance on 4 interface barriers	1	1	Includes development of 4 area plans and community toolkit.

Paramilitary murals replaced or removed	2	8	Eight militaristic murals removed and replaced in participating communities.
Organisations working in partnership on Peace III plan	24	73	
New partnerships developed in relation to PEACE III	4	4	5732 Migrant & Minority Ethnic Project; 5802 Divercity Project; 5783 Growing Together; 5739 Interfaces Programme.
Meetings held	16	34	Refers to meetings of the Good Relations Partnership. 34 meetings of the Partnership between Aug 08 and Sept 11.
Best practice studies	12	15	Across all themes and delivery mechanisms.
Cross border Partnerships established and supported.	0	21	Across all themes and delivery mechanisms.

In addition the following outcomes have been achieved due to the PEACE III intervention.

- Increased inter-community contact;
- Increased use of shared public spaces;
- Increased inter-agency collaboration;
- New models of planning and engagement;
- Increased capacity of voluntary & community sector;
- Environmental improvements and creation of new shared spaces – community gardens etc;
- Significant progress on reduction/removal of physical barriers with agreement of local communities;
- Support for positive expression of cultural heritage and shared cultural collaboration;
- Increased capacity within migrant & minority ethnic sector;
- Early years interventions on anti-bullying/ anti-racism/ anti-sectarianism work;
- Resourcing grass roots/ frontline work.

Q.5.b Please share with us your views of what works well in the current programme as well as what could be improved.

What works well

- The current model of a partnership approach led by Local Authority allows the flexibility to respond to locally identified need and has worked well.
- 100% contribution towards project costs
- Development & Delivery of Strategic plans has worked well
- Flat Rate for overheads has reduced administrative burden.
- Local communications/ engagement and networking activity has resulted in enhanced buy-in and positive feedback process.

What could be improved

- Lengthy assessment and approval process negatively impacting upon timescales for delivery
- Co-ordination with other PEACE III Partnerships
- Need for flexibility in the inspection & verification regime
- More of a focus on outcomes rather than compliance and administrative process.
- Cooperation/ Information Sharing with other funders and agencies

Q.5.c If you have not been involved in PEACE funding, can you please identify any obstacles to your participation and your views on how these can be addressed?

Themes for PEACE IV

Q.6.a What type of change do you wish to see in the Northern Ireland and border region society over the next 7 years?

- Improved health, educational and employment opportunities especially for young people and interface communities.
- Strong leadership role for local government.
- More joined up approach between central and local government, statutory providers, other funders and other EU Programmes e.g. DEL and DETI Programmes.
- Increased engagement from young people and migrant & BME sector. Increased economic, social and political leadership from these groups.
- Greater use of the wealth of content and practice re diversity awareness/ anti-sectarianism and anti-racism work.
- Maximising use of existing community assets e.g. schools, sporting and recreational facilities.

Q.6.b What type of activities should the PEACE Programme fund to bring about this change?

- Youth Engagement & early years interventions.
- Interface regeneration programmes with innovative aspects tackling issues such as renewable energy/ food production etc.
- Leadership development for young people, minority ethnic communities.
- Collaborative peace-building and conflict transformation work between central/ local govt/ statutory bodies and local communities.
- Anti-sectarianism and anti-racism training.

Q.6.c Based on your answer to question 6.a. and 6.b., and from the list of thematic objectives in Appendix 2 of the Consultation Information Document, identify up to 4 thematic objectives that should be included in the new programme.

Themes 8,9, 10 and 11. Specifically the investment priorities highlighted below:

Employment and supporting labour mobility

(a) Development of business incubators and investment support for self employment and business creation.

(b) Local development initiatives and aid for structures providing neighbourhood services to create new jobs, where such actions are outside the scope of the ESF Regulation.

(c) Integrating cross border labour markets including cross border mobility, joint local employment initiatives and joint training.

Social Inclusion and combating poverty

(a) Investing in health and social infrastructure which contribute to national, regional and local development, reducing inequalities in terms of health status, and transition from institutional to community-based services.

(b) Support for physical and economic regeneration of deprived urban and rural communities.

(c) Support for social enterprises.

(d) Promoting gender equality and equal opportunities across borders, as well as promoting social inclusion across borders.

Education, Skills and lifelong learning

a) Investing in education, skills and lifelong learning by developing education and training infrastructure.

b) Developing and implementing joint education and training schemes.

Institutional Capacity Building and efficient public administration

a) Enhancing institutional capacity and an efficient public administration by strengthening of institutional capacity and the efficiency of public administrations and public services related to implementation of the ERDF, and in support of actions in institutional capacity and in the efficiency of public administration supported by the ESF.

b) Promoting legal and administrative co-operation and co-operation between citizens and institutions.

Q.6.d What are your views on including a sustainable urban development dimension and / or an integrated territorial investment option in the programme? (See appendix 3 of the Consultation Information Document)

It is important to acknowledge the key role of Belfast as regional driver and the specific urban agenda. To this end the Council would request that consideration be given to the creation of an '**Integrated Territorial Investment**' funding model for Belfast and/or other parts of the region which would pull together a range of EU funding streams (including the European Regional Development Fund and European Social Fund) to deliver prioritised activities linked to an agreed Integrated Urban Strategy for the City.

Belfast is a city with a complex mix of organisations with different remits working on various projects, initiatives and strategies. As the democratically elected body within the city, Council is committed to demonstrating civic leadership and working in partnership with a range of public, private, voluntary and community organisations for the well-being of its citizens. This will be of critical importance with the forthcoming changes following the Review of Public Administration, development of community planning and transfer of functions.

Problems of security, crime, community relations and racist incidents, are particularly acute in Belfast and have had a consequent impact on mutual suspicion and fear. During the conflict, Belfast was the seat of the most intensive violence in NI and suffered disproportionately as a result. "*Northern Ireland's Troubles: The Human Costs*"¹ report highlights that out of 2,902 fatal incidents during the conflict 1,352 (47%) occurred in Belfast. There were also 1,216 resident victims of the conflict living in the city.

¹ '*Northern Ireland's Troubles: The Human Costs*' – MT Fay, Mike Morrissey and Marie Smyth (1999)

Q.6.e Do you have any projects in mind that will contribute to bringing about the type of change that you think is necessary within the region?

Actions to create and promote use of shared public space, promote mobility within and between communities. Economic costs of current situation include the policing of numerous interfaces and provision of high security presence; duplication of services; restricted access to core services; little mobility in employment terms / journeys to work via 'hostile areas'; difficulty in attracting investment.

Actions to develop and deliver integrated interface regeneration strategies. It is essential that local communities are involved in the process of re-developing contested spaces, supported through dialogue and training, in order to avoid creating new interfaces and transforming existing interfaces.

Actions to promote inclusive cultural expression and celebration.

Action to align good relations/ peacebuilding and conflict transformation activities with the processes of existing policy development in areas such as education, regional strategic planning, urban and rural regeneration and community development and culture, arts and leisure. For example there is a clear link with the proposed Urban Regeneration and Community Development Framework i.e. the policy objective to develop more cohesive and engaged communities and the key action of strengthening networks and cross interface schemes to develop positive community responses to social, economic and environmental problems.

PEACE IV Delivery Structures

Q.7.a Bearing in mind the specific objectives of the PEACE Programme what delivery mechanisms do you consider to be appropriate to implement the PEACE IV Programme?

The Good Relations Partnership is responsible for managing and administering the funding available through the PEACE III Programme.

The Partnership consists of 21 members - 6 elected members - one from each of the Party Groups on the council; plus representatives from the major statutory organisations and the community / voluntary sector in Belfast.

The independent external evaluation commissioned by SEUPB² found that the Good Relations Partnership included established Peace and Reconciliation policy partners and that models of inter-agency collaboration were very evident from the plan and that it was also successfully encouraging intra and inter community collaboration. It also found extensive evidence of the bottom up approach through the use of community bodies for delivery and community involvement in planning.

Q.7.b What are your views on using the Community Led Local Development approach and / or Joint Action Plans? (as outlined in Appendix 4 of the Consultation Information Document)

Local Authority led CLLD mechanism either as a standalone option or as part of an Urban ITI. More detail would be necessary on the proposed Joint Action Plan mechanism to inform an options appraisal on final delivery mechanism for any future Programme.

General Questions Applicable to both Programmes

Application, Assessment and Approval of Projects

Q.8. Please provide suggestions on how the assessment and approval process could be improved in the new programming period to ensure the timely approval of projects.

Comet Stakeholder comments may be summarised as follows:

- 2 Stage approach was much better for the final Programme call.
- Assessment process needs to be much shorter -26 weeks.
- Process should match delivery structures i.e. bottom up like in INTERREG IIIA where Cross Border panels made calls, assessed projects and made recommendations to Steering Committees.
- Return to system whereby Groups were able to attend Steering Committee meetings and defend projects and answer queries. This would save a lot of time back and forth through economic appraisers and SEUPB staff.
- Economic Appraisal – The use of National rules should be taken out.
- Need for consideration and improvement to the composition of the Steering Committees and Economic Appraisers to ensure that projects are assessed by experts in the field.
- Set guidelines and regulations at the outset and avoid changing goal posts which happened so often in INTERREG IVA.

PEACE IV

Transparency on assessment process.

Consistency of appraisal process – different consultants applying different approaches in appraisal of local action plans.

Need to fit in with local investment strategies and complementary strategies.

Assessment process needs to be much shorter - 26 weeks should be the target.

Project Financing and Match Funding

Q.9.a Please provide suggestions on the arrangements for match funding. Should the current arrangements to source match funding continue, or should some or all of match funding be provided by the applicant (public or private)?

Comet stakeholders feel that match funding

- Should remain the same i.e. 100% but welcome the fact that match funding can come from private sources. If Projects in the next programme are not 100% funded, they would not get completed in this current climate.
- Councils, particularly in the South would find it difficult to provide match funding although the reverse argument is that providing match fund indicates a greater level of commitment and buy in from applicants.
- Look at the Social financing model/community shares. Open up thinking for all sources of finance, Private financing could be used well as an intermediary fund principle.
- Keep all options open – use of government departments plus possible private as match.
- Timescales for spending may be an issue. (Private sector cannot hang around for long assessment processes).
- Need clarification on what money can be matched to different public funds.
- Can staff costs be used as a match?
- Possibly projects to pay a % i.e. 5- 10% towards projects.

PEACE IV

Current arrangements should continue with 25% match funding coming from accountable departments.

Q.9.b What are your views on the use of financial instruments in the INTERREG and / or PEACE programmes?

Comet stakeholders were very open to this and considered different types of instruments as possibilities:

- Recycle/leverage funds – such as holding funds.
- UCIT Cluster Community Investment Trust.
- Finally support other options.
- Grant givers and tenders are **not** giving mixed support. Part grant, part loan. (Social Economy Organisation).
- Community shares (equity finance for the third sector).
- Mechanisms need to be in place to retrieve money and reallocate where it's needed.
- Share Investment.

Reducing the Administrative Burden

Q.10.a What are your views on these proposals to reduce the administrative burden on beneficiaries in the new programming period?

Comet stakeholders welcome the proposals to reduce the administrative burden.

Q.10.b Please provide additional suggestions on how to reduce the administrative burden.

Comet Stakeholders did not address.

Equality and Environment

Q.11. Please describe any actions the Programmes could take in relation to promoting equal opportunities including the integration of a gender perspective, and the prevention of discrimination, during programme preparation and implementation?

Welcome the proposed Equality Impact Assessment of the new Programmes planned for 2013.

Q.12 Please describe any actions that the programmes could take to protect and improve the environment during both programme preparation and implementation.

Welcome the proposed Strategic Environmental Assessment of the new Programmes planned for 2013.

Additional Comments – INTERREG V

Q.13. Please make any additional comments about a future INTERREG V Programme that have not already been included in previous questions.

Comet stakeholders welcomed the opportunity to be invited at this early stage of programming to make comments and recommendations. The stakeholders and COMET INTERREG and Good Relations partnerships appreciate this partnership approach.

Comet would urge SEUPB to have an immediate discussion with accountable departments around their future EU Thematic priorities and whether their choices will have a bearing on the INTERREG V programme.

Additional Comments – PEACE IV

Q.14. Please make any additional comments about a future PEACE IV Programme that have not already been included in previous questions.

Welcome the commitment to a PEACE IV Programme that will build upon the significant progress made under the PEACE III Programme.