



Submission to Southern & Eastern Regional Assembly

**On behalf of Local Development
Local Action Groups**

**By
ILDN Strategic Policy Group**

for

**Consultation on the preparation of a new
Southern & Eastern Operational Programme
2014 - 2020**

May 2013

Introduction

ILDN is the representative body for the 51 Local Development, Local Action Groups (LD/LAGs) operating nationally delivering a range of local and rural development programmes including LEADER, Local Community Development Programmes.

ILDN are making this submission on foot of a call for submissions advertised on the Department of Public Expenditure and Reform website with the objective to inform the design of the Irish Partnership application due to be submitted to the EU in the coming months. In particular, this submission aims to inform the department on the suggested areas where Community Led Local Development can be used to support an integrated approach to developing local and rural development strategies being implemented by LD/LAGs.

ILDN welcomes the 'Common Guidance of the European Commission' Directorates-General AGRI, EMPL, MARE, and REGIO on the Community-Led Local Development in European Structural and Investment Funds which provides much needed elaboration on the value and role of Community Led Local Development (CLLD) to member states authorities and stakeholders in advance of the preparation of the Partnership Agreements. Although these are guidance, ILDN believes that they capture the key learning from the CLLD approach as gained in Ireland over the last two decades through LEADER and LCDP and related programmes and initiatives delivered by 'Local Development Local Action Groups' (LD/LAGs) across the state. We would therefore recommend that due consideration is given to the Commission' Common Guidance document in the framing of Irelands Partnership Agreement.

In addition to this submission, ILDN are requesting to be involved as partners in the development of the Partnership Agreement for Ireland, in line with EU Partnership Principles in Article 5 and as outlined in 'The European Code of Conduct on Partnership – The Delegated Act'. ILDN has undertaken a significant amount of work in preparation for the 2014 – 2020 round of funding. This coupled with the extensive experience and learning from over 20 years of involvement of delivering a range of EU and national programmes positions ILDN positively as a key partner in the planning and implementation process. In line with the European Code of Conduct, we believe that this involvement, given the tight timeline, should commence as soon as possible and ILDN have approached D/PER in this regard.

The focus of the submission will be on highlighting the important role and contribution that CLLD has to make on ensuring maximum impact of all the Funds and on the unique role of LD/LAGs in Ireland has as an established delivery mechanism for programmes and initiatives supported under EU Funds i.e. LEADER, Equal, LIFE and other ESF funded areas covering education, training, unemployment, disability and anti-poverty. The bottom-up approach as delivered in Ireland by LD/LAGs using local development methodologies like LEADER is recognised as a CLLD model of best practice. The Irish LD/LAG model as developed and delivered by the 51 rural and urban local development groups across the country satisfies the criteria for CLLD as laid down in the EU Common Provisions Regulation and is a proven infrastructure which will ensure continuity of local development best practice in Ireland and which also provides an ideal structure for the deepening of CLLD as a

European tool for enhancing regional and local development and for making the EU Funds more relevant to places and people who are most in need of the supports that the funds can provide.

The '*Position of the Commission Services on the development of Partnership Agreement and programmes in IRELAND for the period 2014-2020*'¹ provides a useful framework to address the key questions (1,2,3,4) as outlined in the Invitation to make a submission document. We believe that the table outlined over the following pages will cover the key questions as they relate to CLLD and the role of LD/LAGs in Ireland. We are also conscious of the key strategic links between the EU 2020 Headline Targets and Ireland National Reform Programme and the priorities outlined therein and the need for the Partnership Agreement to address these priorities through developing a work plan involving a coherent set of goals and actions linking with the EU 11 Common Strategic Framework objectives all leading to the overarching objectives of Smart, Sustainable and Inclusive Growth.

a) Arrangements for effective programming and delivery

An in-depth Report on employment and social inclusion in rural areas commissioned by Pobal and published in March 2013 by Dr Kathy Walsh and Brian Harvey² provides some useful observations for arrangements for effective programming and delivery of the next round of EU Funds in Ireland. One recommendation is to "recognize and re-affirm the value of community development in rural areas, utilizing the planned new European Community Led Local Development (CLLD) for 2014-2020 as a global grant for inclusive rural development".

The EU Commission guidance document¹ to Ireland on preparing the Partnership Agreement and associated programmes provides strong support for the role of Community Led Local Development (CLLD) and cautions about the need to "avoid fragmentation of investment". LD/LAGs continue to provide the ideal vehicle for the delivery of a coherent and integrated local development strategy using the CLLD approach.

Local Development Local Action Groups need a continuity of funding in the form of a well-resourced global grant to ensure continued operations and a critical mass of projects to continue to develop and implement relevant local development strategies that can make a real impact on unemployment, social exclusion and integrated rural development. The Commission also advises that "The structure of programmes should take into account the division of competencies for relevant policies between regional and national ensuring overall coherence while respecting local conditions". This, along with the strong endorsement of CLLD as a particular strand of investment into rural and urban economies to "respond to complex territorial and local challenges through the involvement of local communities" supports the bottom-up approach of LD/LAGs and the competencies in local and rural development built up over the last 20 years in Ireland.

In relation to the next LEADER programme, ILDN had made a detailed submission to the Department of Agriculture in January 2013 which is available on request.

¹ http://ec.europa.eu/regional_policy/what/future/pdf/partnership/ir_position_paper.pdf

² Walsh K. and Harvey B. Employment and Social Inclusion in Rural areas: A fresh start, Pobal, March 2013


ILDN notes the Commissions Services' advice on Coordination between policies and ensuring of the necessary synergies between - and complementarity of – interventions being a key condition for successful implementation of Common Strategic Framework (CSF) Funds (p. 16). We believe that in terms of CLLD, this would be best achieved by Ireland adopting the multi-fund option which offers better potential for a 'whole of government' approach both from a vertical and horizontal governance perspective. We also note the Commissions' invitation that each member state "to present its approach as regards CLLD across the CSF Funds indicating the main challenges, objectives and priorities, the type of territories, the role of local action groups and coordination mechanisms and the way preparatory support will be made available for local action groups". The Commission also strongly recommends that "the CSF Funds should exploit potential for synergies" among all EU funding streams, something that the LD/LAG approach using CLLD is particularly suitable for.


To support the multi-fund approach, ILDN is recommending that LD/LAGs are allocated a minimum of 5% of the ESF, EMFF and ERDF Funds for delivery through CLLD integrated local development strategies. In addition to this, rural areas should also have allocated 10% of the RDP available Fund, with 5% covering the LEADER approach and 5% covering LEADER activities under the rural development strategy across the 6 Priorities. In order to support the delivery of effective multi-annual local development strategies incorporating the multi-fund approach, ILDN requests a national commitment to co-financing the EU 7 year multi-annual Funds for use as global grants by LD/LAGs. On foot of a call for submissions on the next Rural Development Programme, ILDN has made a specific submission to Department of Agriculture in January 2013.



ILDN believes that the format of the table below is conducive to demonstrating LD/LAGs effective use of CLLD for 2014 – 2020 by making clear linkages between 'EU funding Priorities', the related 'CSF Thematic Objectives', the EU suggested 'Proposed Areas of Action' 'National Priorities' and 'CLLD Added Value' activities.


- **EU Funding Priority** – This column of the table outlines the EU Commissions' Services view on priorities for CSF Funds for Ireland for 2014 – 2020.
- **Related Thematic Objective** – This column of the table outlines the primary related CSF Thematic Objective and also the potential secondary related objectives. The 11 Thematic Objectives translate the Europe 2020 strategy into operational objectives to be supported by the CSF Funds.
- **EU Proposed Action Priorities** – This column of the table outlines the suggested EU Funding Action Priorities for each Thematic Objective, reflecting Irelands specific challenges based on country analysis undertaken by the EU.
- **National Priorities** – This column of the table outlines the important related policy areas and rationale for intervention identified by ILDN as being important from a local development perspective.
- **Community Led Local Development Added Value** – This column outlines the suggested related actions where LD/LAGs using the CLLD approach can add value to addressing the National Priorities.


b) Assessment of funding needs in relation to thematic objectives and CLLD added value


EU Funding Priority	Related Thematic Objectives	EU Proposed Action Priorities	National Priorities	CLLD Added Value
Combating long-term and youth unemployment and social exclusion	Promoting Employment and labour mobility (8) Actions under this thematic objective may also contribute to related objectives of 1, 3, 4, 5, 6, 9, 10.	1. Access to employment for job-seekers and inactive people, including local employment initiatives and support for labour mobility	<ul style="list-style-type: none"> Unemployment in Ireland rose from a low point of 4.7% in 2007 to its present level of 14.6%, or 430,900 (CSO 2013). Revise and update the National Action Plan for Social Inclusion in light of the impacts of austerity and support local development initiatives to mitigate impacts. In 2010, 7.5% of Irish population suffered from severe deprivation, higher than EU avg of 5.4% (EU Commission Services 2012) investment in the social economy as a significant driver in the rural economy, with a strategy for its development and a national support unit. (<i>Walsh et al Pobal 2013</i>) Social Enterprise in Ireland comprises 0.68% (5,100) of total employment compared to EU at 6%. An expansion of the SE sector has been strongly endorsed by EU (COM 2011/ 682) & Forfas (2012). The IMF (International Monetary Fund) in its review of Ireland's bailout programme (April 2013), has warned that the country faces "an acute unemployment crisis" saying the broad jobless rate is at "a staggering 23%" despite emigration", when under-employed and those on training schemes are included. Ireland lags behind EU in embracing new technologies in the promotion of environmentally-friendly and resource efficient economy (<i>Walsh et al 2013</i>) 	<ul style="list-style-type: none"> Work to support unemployed access employment, upskilling and access lifelong learning opportunities through expanding the LCDP using ESF In rural areas this includes supports for under-employed smallholders & seasonal workers where there is an opportunity through delivery of LEADER across all 6 RDP Priorities LCDP as the only national prog. targeted at reducing poverty, needs to be properly funded going forward (-42% cut in programme budget since 2008, compared to general government spending cuts of - 4.3%) Create stronger links between LCDP and the 'EU 2020' and Ireland's 'National Reform Programme' targets for tackling poverty. LD/LAGs have a long history of supporting the social economy sector and with a re-introduced national strategy for investment, significant job creation and social dividend can be achieved in rural & urban areas Use of EU Intergraded Inter Territorial (ITI) Fund to provide CLLD investment opportunities for to tackle unemployment, training and upskilling in urban areas For large numbers of unemployed in rural areas, FDI or an Export led recovery will not provide the jobs needed. A suitably funded Social Enterprise Strategy is required for rural areas to stimulate and help realise the potential of this sector. <p> Focus funding on local initiatives providing a shift to an energy efficient, low carbon economy. Initiatives to retrofit social housing stock to improve energy efficiency could be achieved at low cost by using community training schemes (i.e. Tus) more imaginatively i.e. combining work and skills acquisition involving practical skills development & certification in conjunction with ERDF Funds</p>



Combating long-term and youth unemployment and social exclusion <i>(continued)</i>	Promoting Employment and labour mobility (8) Actions under this thematic objective may also contribute to related objectives of 1, 3, 4, 5, 6, 9, 10. <i>(continued)</i>	2. Sustainable integration of young people not in employment, education or training (NEET) into the labour market	<ul style="list-style-type: none"> The proportion of young people in Ireland not in Employment, Education or Training (NEET) is the third highest in the Union at 18.9% and an unemployment rate of 29.4% in 2012 Ireland's Early School Leavers from Education and Training rate is 10.6% with a NRP target of 8% (Forfas 2010) found unemployment falling heaviest on younger age groups and those with lower educational attainments. Young people under 18 in Ireland are more strongly affected by severe material deprivation, 10.6% compared to 6.7% in EU 	<ul style="list-style-type: none"> NEETs are a significant issue in Ireland with 30% of under 25s now unemployed and specific approaches are needed in rural and urban areas to engage young people and link them with employment, training and lifelong learning opportunities.  <p><i>The Youth Guarantee provides a useful framework for tackling NEET and LD/LAGs can bring experience of working with youth to bear on developing innovative community based approaches to implementing the Youth Guarantee.</i></p> <ul style="list-style-type: none"> Young people can often become disengaged from labour market and unresponsive to traditional activation, requiring local community based innovative approaches to get them re-engaged and prime them for further mainstream opportunities.
		3. Modernisation and strengthening of labour market instructions	<ul style="list-style-type: none"> Job losses in Ireland since the onset of the crisis have been concentrated typically among low skilled groups such as 'craft and related', 'plant and machine operatives', 'clerical' and 'sales'. In particular, jobs in construction will not come back, and skills acquired by many are no longer in demand (EU Commission Services 2012 p. 7) 	<ul style="list-style-type: none"> 24 LD/LAGs deliver Local Employment Service (LES) on behalf of DSP, leveraging local linkages with employers and communities to help match local people with jobs. Using ESF funding, the LES could be expanded to cover all LD/LAG areas nationally to improve rural activation and job matching services. Local knowledge & relationships is critical to successful activation.
		4. Facilitating diversification and job creation in rural areas	<ul style="list-style-type: none"> The need for a specific rural policy on employment. (Walsh <i>etal</i>, March 2013 - Pobal) highlighted the need to focus on integrated supports like transport, childcare and guidance. The level of underemployment in rural areas is 135,700 or 22.7%, the third highest in the Union (<i>ibid</i>) Numbers below the 60% poverty line rose from 15.6% to 18.5%, with the most rural areas having the highest rates of poverty (>25% in some rural locations) (<i>ibid</i>) 	<ul style="list-style-type: none"> Higher levels of unemployment in rural towns/villages with populations $\geq 3,000$ and $< 5,000$ (<i>ibid</i>) requires a local development approach drawing on a menu of EU Funds i.e ESF, LEADER, ERDF, inc Social Economy and greater use of the DSP 'Back to Work Enterprise Allowance' scheme delivered through LD/LAGs The Smallholder Initiative successfully run under LCDP has had to be scaled back in recent years due to LCDP budget cuts. The service worked with under-employed small farm families providing advice, guidance on 'on and off farm' options. This activity can be ramped back up again with the use of ESF fund to complement LCDP and RDP LEADER across the 6 Priorities.

<p>Combating long-term and youth unemployment and social exclusion (continued)</p>	<p>Promoting Employment and labour mobility (8)</p> <p>Actions under this thematic objective may also contribute to related objectives of 1, 3, 4, 5, 6, 9, 10. (continued)</p>		<ul style="list-style-type: none"> • Major challenges exist in terms of the sustainable use of resources, particularly in the areas of renewable energy, energy efficiency, water, biodiversity, air, soil and marine and threat of climate change (EU Commission Services 2012, p 8) • A need to focus supports on community-based rural environmental programmes (ibid) • Rapid fall in off-farm employment in farm households (30.5% in a year), half of which was attributed to contraction of construction –related employment. • Recent research (Morgenroth – Western Development Commission) suggests that rural areas have reverted to their earlier pattern of decline & that future growth will be more urban-driven • 90% of all enterprises employ fewer than 10 persons (micro-enterprises) highlighting the importance of LEADER and BTWEA supports for start-ups • Adaptation of activation to the rural environment, refocusing resources from control to intensive support and outreach, with investment in childcare, transport and progression (Walsh et al – Pobal 2013, p. 7) • Reinvestment in apprenticeships as a means of equipping the workforce for the new jobs already identified as appropriate for rural areas (ibid) • The unemployment rate is set to fall only gradually (to 13% by 2015). Regional differences for 2007 – 2009 show that GDP in BMW region at 96.6% of EU avg compared with 151.1% for 	<ul style="list-style-type: none"> • Greater flexibility in rules of LEADER, EMFF and ESF is required to allow LD/LAGs adopt the funds to better address local needs (i.e. reducing dependence on fossil fuels, greenhouse gas emissions, renewable energy (wind, marine and biomass energy), energy efficiency in public buildings and community rural transport. • LD/LAG application of environmental funds (relevant priorities of RDP, LIFE etc) to improve water quality, tackle sources of pollution & help achieve EU Biodiversity Strategy • Greater use of LEADER methodology across all funds (multi-fund approach) should be adopted to maximise CLLD impact & improve integration • Highlighting the need for community based approaches to micro enterprise creation (LEADER, BTWEA, Social Enterprise, locally based economic infrastructure e.g. trails, enterprise work space) <p> <i>LD/LAGs to use LEADER and other Funds to set up Rural Innovation Hubs which would act as idea generators and networking fora for stimulating rural micro-enterprise, environmental initiatives and social economy also focusing on rural youth</i></p> <ul style="list-style-type: none"> • Community employment schemes like Tus/RSS should also have a training budget for basic skills assessment and development. In rural areas investment is generic skills and basic core competencies which are transferrable to all employment sectors are often more appropriate <p> <i>Further develop the Rural Social Scheme as a Rural Environment Scheme with broader scope. One example could be to maintain road water courses and hedgerows, develop and maintain bio diversity corridors (combined with training and certification)</i></p>
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<p>Combating long-term and youth unemployment and social exclusion (continued)</p>	<p>Promoting Employment and labour mobility (8)</p> <p>Actions under this thematic objective may also contribute to related objectives of 1, 3, 4, 5, 6, 9, 10. (continued)</p>	<p>5. Facilitating the transition towards new skills in marine economy i.e. from fisheries to aquaculture, marine tourism</p>	<p>S&E, with unemployment at 2.5% higher in BMW region at 16.5% (2012).</p> <ul style="list-style-type: none"> The need for a supportive framework for the effective use of the 6 RDP/LEADER Priorities, hence delivering added value and additional resources for farming and farming community There is a strong case for some of the state's enterprise budget to be re-allocated towards the development of rural-specific jobs (Walsh et al , Pobal p. 50) <p>There should be a move away from the reliance on the private sector for job creation towards a more flexible one that also includes a role for state-based enterprises through model projects. (ibid)</p> <ul style="list-style-type: none"> Support for quality job creation in coastal communities through adding value to fisheries and aquaculture, diversification of small scale fishing and marine aquaculture The aquaculture sector in Ireland has not managed to contribute its share to meeting the continuing growing seafood demand (EU Commission' Services, p.9) Targeted funding should harness growth in Ireland's blue economy, in line with the Integrated maritime Plan' Harnessing our Ocean Wealth' adopted by Irish Government in July 2012. (ibid) 	<ul style="list-style-type: none"> Making micro-finance loans available through LD/LAGs, to support co-funding with LEADER (addressing market failure) <p> Broaden the use of the LEADER methodology by LD/LAGs supporting farmer's avail of a broader set of opportunities under the 6 RDP Priorities inc: support for creation of clusters/networks, collective actions on sustainable production and co-operation, actions on reducing the supply chain for rural producers. <u>See page 9 – 16 of ILDN Submission on Rural Development Programme 2014 – 2020 for full list of proposed actions under LEADER (attached).</u></p> <ul style="list-style-type: none"> The RDP LEADER funding being implemented by rural LD/LAGs is proving critical at stimulating rural enterprise. This funding needs to be increased so as to form a key part of the LD/LAG local area strategy working towards EU objective of facilitating diversification and job creation in rural areas. A new national focus on social economy with LD/LAGs to be given a specific brief to support, develop and fund the social economy sector at a local level. Community based training funded under LEADER or ESF focused on new jobs in rural areas, (e.g. green jobs, renewables, rural and eco-tourism using short fast courses in distinct skills LD/LAGs operating in coastal areas delivering LEADER and EMFF in an integrated way.
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<p>Combating long-term and youth unemployment and social exclusion (continued)</p>	<p>Promoting Social Inclusion and Combating Poverty (9)</p> <p>Actions under this thematic objective may also contribute to related objectives of 3, 4, 6, 8, 10.</p>	<p>1. Active Inclusion: - Support people in poverty or at risk of poverty and social exclusion to access counselling, training and other activities, with the aim to bring them closer to the labour market;</p> <p>and</p> <p>- preventative support at an early stage for children and teenagers of vulnerable groups to help them integrate in the labour market and society</p>	<ul style="list-style-type: none"> • European Commission proposal for CLLD for the next programming period (2014-2020) opens up the possibility of the community development approach taking a lead role in promoting social inclusion in rural areas. • The lack of connectedness between measures, without a coherent plan to organise them together, means that when taken collectively, they fall short of potential and help to explain why problems of exclusion and under-employment remain intense in more rural areas (NESC 1994) • NESC's 'New approaches to rural development' strongly recommended that rural development initiatives not be subsumed into local government (P 136) • In the Memorandum of Understanding, the Irish authorities commit to the enhancement of activation services and the focus on retraining of unemployed to reduce the risk of long-term unemployment (EU Commission's Services) • Consistent poverty levels rose in both urban and rural areas, but rose more in urban areas (+36% compared with +14.5% in rural areas and basic deprivation levels rose in both urban and rural areas, but with a slightly higher rate of increase in rural areas (+46% in rural areas compared with +40% in urban areas over the period 2009-2011), and • Towns (settlement of $\geq 3,000 < 5,000$) would appear to have fared worse than more rural or indeed more urban locations. (Walsh et al – Pobal p. 5) 	<p> Currently LD/LAGs in Ireland deliver a broad range of initiatives to promote social inclusion. Through the multi-fund option post 2014, LD/LAGs can bring a more coherent strategy at local level to combating poverty and social exclusion. This requires one local development strategy covering different EU and national funds i.e. LEADER (in rural areas) and LCDP nationally, developed and implemented by LD/LAGs with close links with local and national statutory authorities.</p> <ul style="list-style-type: none"> • There is considerable scope for enhancing 'the connections and the complementarity of social inclusion programmes' at a local level through LD/LAGs, who can provide a trusting, non-threatening, comforting environment which are prerequisites for effective engagement with the socially excluded. • Activation of unemployed and those most distanced from labour market requires a holistic approach requiring local knowledge of job opportunities and linkages between key service providers. This is achieved through the current board structures of LD/LAGs. Statutory bodies must commit local staff to the boards to continue to achieve the integrated approach to labour market and inclusion • In rural areas, for activation to be successful, it requires issues of affordable childcare and transport to be addressed. ESF funds should be used to make Community childcare and the Rural Transport Initiative more accessible and to support those who want to take up job, training and further education in rural areas. • LD/LAG activities to continue to focus on most deprived areas, but with particular attention on small towns and local authority housing areas using LCDP funding (enhanced by ESF) using bottom up approaching involving target groups.
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<p>Combating long-term and youth unemployment and social exclusion (continued)</p>	<p>Promoting Social Inclusion and Combating Poverty (9)</p> <p>Actions under this thematic objective may also contribute to related objectives of 3, 4, 6, 8, 10. (continued)</p>	<p>2. Support the basic services and other poverty reduction measures in rural areas:</p> <ul style="list-style-type: none"> - Including the adaptation of local basis services for population, particularly in remote and coastal areas inc addressing the needs of specific target groups; <p>and</p> <ul style="list-style-type: none"> - Fostering CLLD (including LEADER local development strategies) and investments in small-scale infrastructure in rural and coastal areas. Local development strategies should contribute to the diversification into non-agricultural / non-fishing activities and creation of job opportunities in rural and coastal areas. <p>and</p> <ul style="list-style-type: none"> - Promotion of entrepreneurship and skills acquisition of people at risk of poverty in rural and coastal communities 	<ul style="list-style-type: none"> • Ireland was above the EU average in relation to the at-risk-of-poverty-or-exclusion rate in 2010 (29.9% compared to 23.5%). This was driven mainly by the low work intensity as reflected in the sub-indicator, which increased by more than 9 percent between 2007 and 2010 to reach 22.9%, more than twice the EU average of 10%. Children face worse outcomes when compared to other age groups, again driven by low work intensity (i.e. the share of children living in low work intensity households), which reached 25.5% in 2010, compared to an EU average of 9.1%. (EU Commission' Services) • Local development strategies should contribute to the diversification into non-agricultural activities and non-fisheries and creation of job opportunities in rural and coastal areas (<i>ibid</i>) • The reduction of poverty remains also a very important priority for Ireland and a sizeable part of available resources should be dedicated to promote active inclusion (<i>ibid</i>) p. 10 • No effective rural-proofing policy in Ireland. Some countries use the 'equivalence principal' for determining investment in rural areas. This means that public services in rural areas should be equivalent in quality as urban areas. (<i>Walsh et al – Pobal 2013, p. 5</i>) • Direct employment in the construction industry in Ireland has contracted from a peak of 284,000 in 2007 to just under 100,000 in 2012. (FAS 2012) 	<ul style="list-style-type: none"> • ESF funding should be made available to LD/LAGs to complement the Local Community Development Programme in the form of a global grant allowing multi-annual programme of flexible actions designed to promote social inclusion and tackle poverty in a proactive way. LD/LAGs have been doing this work but due to 42% cut since 2008, have had to lever ad hoc resources from many sources. <i>Need to reallocate funding back to LCDP as the core national programme to tackle consistent poverty and promote inclusion and channel complementary ESP funds to this.</i> • LD/LAGs have proven their capacity as effective local facilitators to make general support services more applicable to rural populations (an example of this being used by a number of LD/LAGs is 'Building Healthy Communities initiatives' which links clusters of community groups with clusters of key service providers to make provision of local services more efficient in remote rural areas. This template could be used elsewhere with the support of ESF funding. • LA/LAGs continue to develop and implement Local development strategies fostering CLLD making use of all available Funds inc LEADER, ESF, ERDF investing in small scale infrastructure (ex Rural Broadband & enterprise start-up) <p> <i>LD/LAGs using CLLD as a vehicle to develop and deliver added value actions for local job creation, skills development and lifelong learning and volunteering using ESF Funds.</i></p> <ul style="list-style-type: none"> • LD/LAGs make use of the multi-fund arrangements (for all available funds) to promote entrepreneurship and skill acquisition of people at risk of poverty. We recommend the continued commitment and expansion of the Department of Social Protection 'Back to Work Enterprise Allowance Scheme' (BTWEA) both in rural and urban areas. This scheme is proving very effective for those most distanced from labour market and getting them into employment with c 12,000 self-employed nationally on the scheme
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<p>Combating long-term and youth unemployment and social exclusion (continued)</p>	<p>Investing in education, skills and lifelong learning (10)</p> <p>Actions under this thematic objective may also contribute to related objectives of 3, 8, 9</p>	<p>1. Reducing early school-leaving and promoting equal access to good quality early childhood, Primary and secondary education:</p> <ul style="list-style-type: none"> - Support early school leavers & low skilled to gain upper secondary education & to reduce low achievement in basic skills 	<ul style="list-style-type: none"> • Ireland also faces challenges relating to a relatively high level of early school leaving at 10.6%, with a NRP target of 8% • The total population of registered apprentices at the end of May 2012 is 11,653 of which 4,309 are redundant. • The level of new apprentice entrants (registrants) by employers reduced significantly from 2006 – 2011 from 8,306 to 1307 (FAS Service Plan 2012) • Traineeships programmes provide entry-level occupation-specific training and integrates formal training of FAS and workplace coaching. • With regard to healthcare, childcare and social services, there is a strong demand for carers generally, particularly childcare and care of the aged. (ibid) 	<ul style="list-style-type: none"> • Local CLLD initiatives to encourage participation and completion up to Leaving Certificate level ie. Linkages between pre-school, primary school and secondary, Afterschool Activity Clubs, youth diversion projects. • Projects to reengage early school leavers and link them back into further education and training <p> <i>There is scope to increase the number of traineeships by approving LD/LAGs as host employers coupled with social economy funding through ESF (Retro-fitting of social housing scheme, rural environmental scheme and care of the elderly, providing work based training in emerging skills.</i></p>
		<p>2. Lifelong learning, training and advisory services for farmers, seafarers and rural population</p>	<ul style="list-style-type: none"> • A recent study of parts of Limerick and Tipperary found that unemployment most affected men in rural areas and numbers below the 60% poverty line rose from 15.6% to 18.5%, with the most rural areas having the highest rates of poverty (>25% in some rural locations). (Loughrey et al, 2011) • Partnership 2000 established the principal of ‘cumulative marginalization’ recognising the multiple dimensions nature of poverty and exclusion. IN Rural areas broader processes need to be considered such as isolation, distance from services, flanking policies like transport and being on the periphery of decision-making. Villages and small towns with a population of <3,000 people are most at risk. (Walsh et al, Pobal 2013) 	<p> <i>Employability skills initiatives which concentrates on developing generic skills and core competencies for the labour market, inc Equality for Women Measures. Support for CLLD approaches to reengage rural target groups for reskilling, networking , volunteering, community employment and lifelong learning funded through LCDP by ESF</i></p> <ul style="list-style-type: none"> • Social Enterprise for under-employed • The Low Income Smallholder Initiative (LISHI) successfully run under LCDP has had to be scaled back in recent years due to LCDP cuts. The service worked with under-employed small farm families providing advice, guidance, on and off farm options. This activity can be ramped back up with the use of ESF fund to complement LCDP to tackle increased under-employment in rural areas; • LISHI can also take a holistic approach to the small farm household inc lifelong learning, up-skilling and farm diversification and Traineeships for low skilled in demand driven farming e.g. dairy operatives

<p>Promote R&D investment and the competitiveness of the business sector</p>	<p>Enhancing the competitiveness of small and medium-sized enterprises, the agricultural sector and the fisheries and aquaculture sector (3)</p> <p>Actions under this thematic objective may also contribute to 1, 8, 9, 10</p>	<ol style="list-style-type: none"> Promoting entrepreneurship, in particular by facilitating in both the national and cross-border perspectives the economic exploitation of new ideas and fostering the creation of new firms Developing new business models for SMEs 	<ul style="list-style-type: none"> A key point about rural in relation to employment, unemployment issues, poverty and exclusion issues is that they are different in rural areas requiring specific targeted responses and solutions. (<i>ibid</i>) Rural Transport Initiatives (RTI) are run in rural areas by 35 community groups providing essential transport needs for isolated rural communities and costs €9.7m providing 1.74m journeys (<i>Pobal 2012</i>). The proposal to remove the running of rural Transport from local community groups and grafting to larger regional scale managed by local authorities has the potential of making the service less responsive to needs of local rural communities 	<ul style="list-style-type: none"> Rural Innovation Hubs outlined above. Could link well with BTWEA and support a framework for social economy and rural enterprise. This is against the EU principal of subsidiarity and the bottom-up approach to CLLD. RTIs have been very successful at addressing local needs and there is much scope to extend their activities to address a wider set of rural needs, i.e. transport to training, further education and lifelong learning and social networking. Encouraging rural entrepreneurship and diversification of farming and fishing communities using LEADER Using the Back to Work Enterprise Allowance Scheme (BTWEA) to provide self-employment opportunities to those most distanced from the labour market, including young unemployed Measures to enhance competitiveness of SMEs (inc aquaculture, fisheries and maritime sectors and agriculture holdings) Provision of access to capital for rural SMEs through the LEADER programme at various stages of development
<p>Promotion of environmentally-friendly and resource efficient economy</p>	<p>Supporting the shift towards a low-carbon economy in all sectors (4)</p> <p>Actions under this thematic objective may also contribute to related objectives of 1, 8, 9, 10</p>	<ol style="list-style-type: none"> Promoting the production and distribution of energy from renewable sources 		<ul style="list-style-type: none"> LEADER to support the promotion of renewable energy generation and supply (small wind turbines, biomass energy and marine energy) Innovative approaches to smart grids and metering, including training and upskilling to support local needs Link to Rural Innovation Hub above, including upskilling and job creation

Promotion of environmentally-friendly and resource efficient economy (continued)	Supporting the shift towards a low-carbon economy in all sectors (4) Actions under this thematic objective may also contribute to related objectives of 1, 8, 9, 10 (continued)	2. Promoting Energy Efficiency use in SMEs	<ul style="list-style-type: none"> • Need for targeted measures to support food processing, agricultural and forestry sectors 	<ul style="list-style-type: none"> • LEADER to support initiatives to achieve further gains in energy efficiency, renewable energy use and emission reduction
		3. Supporting energy efficiency and renewable energy use in public infrastructure and in the housing/business/transport sectors	<ul style="list-style-type: none"> • EU 2020 & NRP targets to reduce greenhouse gas emissions by 20%, increase share of renewables in final energy consumption to 16% by 2020 • Reduce dependence on fossil fuels and reducing greenhouse gas emissions • The share of renewable energy sources in final energy consumption was at 5.8% in 2010 amongst the lowest shares in the EU and behind target of 16%. (EU Commission' Services, p.8) • Ireland needs to achieve energy savings for business and improve the energy efficiency of buildings (ibid) 	<ul style="list-style-type: none"> • Link to possible CLLD scheme for retro-fittings of local authority housing above.
		4. Climate Change Mitigation Measures	<ul style="list-style-type: none"> • Target of 20% reduction in greenhouse gases by 2020 • In 2010 greenhouse gas emissions showed a gap of 17% against this target • 20% Of territory can be subject to landslides 	<ul style="list-style-type: none"> • CLLD approaches supporting reduction of ammonia, nitrous oxide and methane emissions from agriculture through improved livestock and fertilizer management practices • Enhancement of carbon sequestration afforestation and restoration of grassland
	Promoting climate change adaptation, risk prevention and management (5) Actions under this thematic objective may also contribute to related objectives of 1, 3 8, 9, 10	1. Supporting dedicated investment for adaptation to climate change	<ul style="list-style-type: none"> • Winter rainfall in Ireland is projected to increase by 10% and summer rainfall reductions of 12 – 17% (ibid) 	<ul style="list-style-type: none"> • Local CLLD initiatives to support best practice water management (ecosystem-based adaptation) – Link to Environmental Rural Social Scheme • Support integrated, sustainable development of coastal areas

Promotion of environmentally-friendly and resource efficient economy (continued)	Protecting of the environment and promoting resource efficiency (5) Also 1, 3 8, 9, 10	1. Improve the quality of water	<ul style="list-style-type: none"> Measures to improve the quality of water 	<ul style="list-style-type: none"> CLLD approaches to supporting the Water Framework Directive, inc reduction of water pollution, pesticide management, protection of watercourses from nitrate pollution Links to <i>Broaden the use of the LEADER methodology above</i>
		2. Protecting biodiversity, soil protection and promoting ecosystem services including NATURA 2000 and green infrastructures	<ul style="list-style-type: none"> Considerable effort will be needed to meet the targets defined in the EU Biodiversity Strategy (EU Commission' Services, p.9) 	<ul style="list-style-type: none"> LD/LADs utilising relevant multi-funds to support community approaches to supporting the restoration, preservation and enhancement of biodiversity for grassland, forest, heath and scrub habitats Promoting environmentally sound practices

c) Administrative Arrangements

Community Led Local Development (CLLD) as defined by the European Commission is essentially the Local Development / Local Action Group (LD/LAG) approach as we know it in Ireland. The LEADER initiative was established by the European Commission in 1991 to support rural communities following reforms to the Common Agricultural Policy. Since 1991 there have been four LEADER Programmes, LEADER I, LEADER II, LEADER+ and the LEADER element of the current Rural Development Programme (RDP).

Community led local development (CLLD) is the term used by the European Commission to describe a bottom-up approach to local development which operates on the simple principle that local communities have the best understanding of local needs and with support can devise the best solutions to local issues.

The European Commission has outlined its view that the main components of CLLD involving Local Action Groups (LAGs known in Ireland as LD/LAGs) comprised of local public and private stakeholders implementing Local Development Strategies (LDSs) in targeted areas with a population between 10,000 and 150,000 ³. The Common Provisions Regulation [COM(2011)615] for the next round of EU funding 2014 – 2020 views CLLD as a tool to mobilise and involve local communities and organisations to contribute to achieving the Europe 2020 Strategy goals of smart, sustainable and inclusive growth.

Articles 28-31 of the EU Common Provisions Regulation define a common method for Community-led local development (CLLD) under the Common Strategic Framework (CSF) Funds and these are further complemented by ‘fund specific’ provisions for EAFRD, ESF, ERDF, EMFF which outline CLLD multi-fund opportunities.

The EU common approach to CLLD for 2014–2020 has the following added value ⁴

1. It broadens support for bottom-up local development by opening up the possibility of financial contributions from all CSF funds;
2. It facilitates integrated territorial development through harmonised rules for design and implementation of CLLD;
3. It enables various EU policies to contribute to local development according to their policy objectives and specific instruments;
4. It improves the consistency and coordination of EU Funds support to CLLD.

The Commission also believes that the main benefits of an increased application of the CLLD approach will include:

1. Encouraging local communities to develop integrated bottom-up approaches in circumstances where there is a need to respond to territorial and local challenges calling for structural change;

³ http://ec.europa.eu/regional_policy/conferences/od2012/doc/community_en.pdf

⁴ Council of the European Union, 2011/0282 (COD) 10401/12, Brussels, 25 May 2012

2. Building community capacity and stimulating innovation (including social innovation), entrepreneurship and capacity for change by encouraging the development and discovery of untapped potential from within communities and territories;
3. Promoting community ownership by increasing participation within communities and building the sense of involvement and ownership that can increase the effectiveness of EU policies; and
4. Assisting multi-level governance by providing a route for local communities to fully take part in shaping the implementation of EU objectives in all areas⁵

Background and History of CLLD in Ireland

Ireland have been delivering a broad range of community based integrated programmes targeted at rural development, enterprise and job creation and measures to tackle social exclusion over the last 20 years using the Local Development, Local Action Groups (LD/LAG) as the local planners and implementers.

CLLD & LEADER in Rural Areas:

The LEADER initiative was established by the European Commission in 1991 to support rural communities following reforms to the Common Agricultural Policy. Since 1991 there have been four LEADER Programmes, LEADER I, LEADER II, LEADER+ and the LEADER element of the current Rural Development Programme (RDP).

LEADER I was introduced in Ireland in 1992 and 17 delivery groups were selected to pilot the initiative. A unique feature of the programme was its 'bottom-up' approach whereby EU funds were made available for the implementation of business plans that were designed locally with decisions on project funding made by local action groups. When LEADER II was introduced in 1994, the programme was extended to all rural areas in Ireland and the number of delivery groups increased to 34. Increased funding was made available and there was a specific emphasis on skill acquisition and capacity building to ensure communities had the capacity to deliver business plans. The local action groups were established as limited companies with boards representing the community, voluntary, private and statutory sectors, local authorities and social partners.

Between 2000 and 2006 an enhanced programme, LEADER+, continued to support rural development. Thirty-five groups and three national bodies delivered the programme nationwide. LEADER+ was complemented by national funding delivered under the National Rural Development Programme. In the current EU funding period 2007 – 2013, 35 LD/LAGs continue to deliver the LEADER programme as part of the broader Rural Development Programme for Ireland.

Over the past twenty years, the LEADER programme has invested more than €700 million in Ireland and leveraged another €600 million into a wide variety of projects and initiatives. LDCs working with local communities have channelled this funding into the Irish rural economy to support the development of a range of activities and enterprises such as community facilities, rural tourism and leisure initiatives, craft and food enterprises and farm diversification.

⁵ http://ec.europa.eu/regional_policy/conferences/od2012/doc/community_en.pdf

CLLD & National Social Inclusion Programmes:

LDCs across Ireland have also delivered the Local Development Social Inclusion Programme (now Local and Community Development Programme). These programmes have also worked in accordance with CLLD principles to deliver actions to address unemployment, poverty and social exclusion in disadvantaged areas since 1991 when under the Programme for Economic and Social Progress (PESP) the Government introduced the first Area-based Response to Long-term Unemployment. This saw the establishment of 12-partnership based structures in areas with high rates of unemployment and where there was evidence of local capacity for action. The programme operated as a pilot until 1994 when the local partnership model was extended to other areas and supported under the Operational Programme for Local Urban and Rural Development in the Irish Community Support Framework. This marked the beginning of on-going, mainstreamed government support for local development programmes and the building of a structure to tackle poverty and social exclusion in Ireland.

A restructuring process undertaken by the government in 2007 known as cohesion resulted in the merging of Partnership and LEADER companies into single entities reducing the overall number from 94 to the 51 LD/LAGs operating today.

In the Irish context, LD/LAGs with a close connection to their communities have proven to be excellent enablers in the CLLD process. By asking local communities what their priorities are, LD/LAGs provide appropriate training, employment and enterprise supports. By working with local entrepreneurs to progress their ideas to exploit untapped potential in the local area, LD/LAGs have supported the creation of thousands of innovative new Irish enterprises.

An OECD four year in-depth study of Local Action Group Partnership work in 14 countries revealed “the main impact of partnership is to improve local governance”. Three factors contributing to this outcome are: First, “in all countries surveyed, partnerships stimulate the uptake of public programmes in a way that is consistent with locally shared priorities”. Second, “there are many instances in which partnerships have influenced the targeting of public programmes to better meet local needs” Third, “they combine public programmes with local initiatives, and in so doing, support the development of these initiatives” and they “... provide a crucial brokerage function or ‘glue’ to bring local and national actors and resources together...” (OECD. 2001 p.155; Turok. 2000 p. 16).

Governance as a source of Growth

The bottom up approach to local and rural development has long been acknowledged as an effective approach to stimulating economic activity in local geographic areas and for tackling poverty, social exclusion and deprivation. Four key drivers for growth have been identified by the OECD as core to local economic and social development, **Innovation, Skilled Labour, Entrepreneurship, and Social Cohesion** (OECD, 2005)⁶.

⁶ OECD, (2005), “Local Governance and the Drivers for Growth”, No. 54401, France.

Collectively these drivers are all influenced by a wide range of local, regional and national actors, and appear sensitive to the way stakeholders work together in implementing policy. Their actions can be in synergy or in conflict, and can involve actors from beyond the traditional statutory bodies. The core function of LA/LAGs in Ireland for over 20 years has been to bring key stakeholders together at a local level to develop a partnership approach to developing local solutions to local problems, essentially using CLLD and the bottom up approach to address these important drivers for growth at a local level.

Key findings from the OECD Report in this regard are:

Innovation: A key lesson from innovation activities over the past decade has been that the most important tools for fostering innovation are to be found at microeconomic and local level. While a supportive national framework is a given, it is at the local level that firms learn most from other firms, take advantage of external economies, internalise the risks associated with product development and forge supply chain links.

Skilled Labour: There are a number of way in which skills lead to growth. First, skills are a core element of economic and employment development – where pools of skilled labour are available, there is greater opportunity for entrepreneurship, business development and inward investment. Secondly, diverse and specialised skills are prerequisites to innovation. Finally skills development opportunities are essential to social inclusion.

Evidence suggests that directly helping businesses to access labour market programmes is especially conducive to upgrading the skills of low-qualified workers, and that placement, counselling and training activities are best coordinated locally. LDCs are well placed to coordinate this activity in partnership with business organisations, economic development agencies, local authorities and communities, who are more aware of current and future skill needs.

Entrepreneurship: A spirit of entrepreneurship is vital for growth. Given a national stable macroeconomic framework, local supports can also play an important part in stimulating activity. Therefore for policies to be effective, they must take account of all the various location-specific factors. Business incubators, advisory and information services, training schedules and business networks benefit from being locally designed and tailored to local needs.

Social Cohesion: Each of the growth drivers above have social dimensions that can be captured using the term social cohesion, social inclusion and social capital. Social cohesion can be viewed as the sum of the degree of social inclusion and social capital present in an area.

OECD concluded that it is apparent that governance issues arise in relation to supporting ‘drivers for growth’ at a local level. “There are several drivers of growth for which no single statutory authority is responsible” (OECD, 2005 p. 20). In supporting multi-governance arrangements like LD/LAGs, OECD concluded that National intervention must be coupled with the local resources of business and civil society (i.e. LD/LAGs), effectively utilising the bottom-up approach of CLLD to act as enablers and facilitators to aid and facilitate top down statutory provision.

CLLD 2014 - 2020

Local development strategies for community led local development have to respond to certain requirements set out in the regulation (community-led, private and public partners, multi-sectoral, etc.) and are distinct from territorial strategies that municipalities may Implement. Local development strategies are complementary to mainstream policy and have the proven capacity to make EU and national programmes more applicable to local areas.

ILDN welcomes the strong acknowledgement of the LEADER approach and its endorsement as a strong delivery model for actions under the 6 RDP Priorities for the period 2014 – 2020 and the proposal by the EU to widen the CLLD approach across all the EU Funds. We also believe it's appropriate to highlight the Importance of the 'bottom up' approach and the involvement of civil society in developing and implementing the Local Development Strategy. Ireland has experienced 21 years of successful community led local development funded by the EU and the exchequer through LEADER and Local Community Development Programme. The Irish Local Development Companies have evolved into strong community led representative structures which are innovative, flexible and highly responsive to local needs and demonstrate a high level of organisational and administrative capacity. Their positive reputation at EU level is built on proven results and independent evaluation and monitoring of their structures and activities by the European Commission and the Court of Auditors. CLLD (Community Led Local Development) is already operating successfully in Ireland due to the recognition across government departments of the effectiveness of the LEADER delivery approach. CLLD and the multi fund option offers the opportunity of providing a more integrated approach to the implementation of local development strategies by LD/LAGs

We note the Commission's desire to build on existing 'Local Action Group structures' for the 2014-2020 period for the implementation of CLLD. In this context it is critical that the Irish government makes adequate provision for the transition period between programmes (LEADER and LCDP) in advance of funding being provided to LAGs for the drafting of local development strategies which is to be covered under preparatory support in Article 31 (a) CPR. Flexible models have to be designed at the level of the Member State so that the continuity of the work can be ensured.

The current Rural Development Programme has suffered from having a control regime which is patently unsuitable for the LEADER methodology. It is essential that the 2014-2020 Programme has a control regime which supports the specific attributes of the LEADER methodology whilst also meeting the regulatory requirements. Innovation has always been an important feature and outcome of the LEADER methodology. In order to support a greater emphasis on innovation during 2014 - 2020, the control regime and Programme Operating Rules need to be tailored to ensure innovation is not stifled and must be flexible enough to be applied in a variety of rural settings.

To help Member States prepare for the next programming period, the Commission presented on 14 March 2012 the "Common Strategic Framework" (CSF) which identifies 11 thematic objectives which will provide the overarching framework coordinating the strategic focus of the different contributing funds and describing how they may contribute to the EU2020 objectives. It is understood that national authorities will use this framework as the basis for drafting their Partnership Agreement with the Commission, committing themselves to meeting Europe's strategy for smart, sustainable growth (Article 10 of the CPR). The 11 Common Strategic Framework themes are intended to improve linkages and integration of the different EU finds (EAFRD, ERDF, ESF, EMFF).

ILDN recommends that opportunities for CLLD (including LEADER) be viewed in the context the broader opportunities now available under CSF embracing the synergies and potential of all funds. Effectively CSF is the strategy for to achieve the EUs targets for Smart, Sustainable and Inclusive Growth, the various funds are the vehicles which can help to achieve the strategy.

It is noted that the Commission strongly endorses the Community Led Local Development (CLLD) approach to local development and strongly recommends its application across other funds (Cohesion funds, ERDF, ESF, EMFF). The Commission recognises Ireland's existing LD/LAGs and their delivery of a broad range of complementary programmes (LEADER, LCDP, RSS, TUS, LES, etc) as being a good model of CLLD.

In this context, Commission document on www.eufunds.bg/document/2304 outlines key opinions in relation to the role and implementation structures for CLLD, i.e. *"Integrated community-led local development strategies are used to implement community-led local development (CLLD) which is strictly bottom-up. An example of this is LEADER, financed under the rural development policy. In the case of CLLD it is the local action group, which determines the content of the local development strategy and the operations financed under it"*. A further important observation made in this document is that *"Local development is a generic concept; CLLD refers to a bottom-up process with the involvement of both public and private local interests. It has to be differentiated from local development driven by Local Public Authorities"*.

The Common Provisions Regulations (CPR) document states that "The CSF Funds needs to address multiple development needs at sub-regional and local level. To facilitate the implementation of multi-dimensional and cross-sectoral interventions, the Commission proposes to strengthen community-led initiatives, facilitate the implementation of integrated local development strategies and the formation of local groups, based on the LEADER approach." Article 29 (3), states where it is "...determined that the implementation of local development strategy selected requires support from more than one Fund, a lead Fund may be designated". It also provides for LD/LAGs to use the resources of any CSF fund irrespective of which the Lead Fund is (including EAFRD), or whether a lead fund is adopted, with the LD/LAGs setting out the planned allocation for each of the Funds they intend to draw on, which will be contained in the financial plan of the strategy.

Where CLLD is supported under a single priority axis under ERDF or ESF, it can benefit from a top-up of 10% on the co-financing rate (Art. 110 (5) CPR). ILDN believes that this incentive to adopt the multi-fund approach in the member state 'Partnership Agreement' should be wholeheartedly embraced as it offers the potential for greater integration of CLLD approaches at LDC level, combined with the additional 10% co-financing from non EAFRD funds.

There are also significant common themes under EAFRD and ESF (See Appendix 1), i.e. promoting social inclusion and combating poverty is one of the main objectives of the ESF, but the ESF may support other priorities (related to employment, education and institutional capacity as detailed in its scope) for which a local strategy could be developed to respond to the needs of the territory, this links closely with Priority 6 and other Priorities of the RDP. Similarly ERDF can support a broad range of activities across the 11 thematic objectives.

Appendix 1 attached maps the thematic objectives which are common to EAFRD, ESF, ERDF (Thematic objectives 1, 2, 3, 4, 8, 9, 10). ILDN believes that relationships across objectives marked in bold could lend themselves to supporting a multi-fund approach for CLLD implementation at a local level by LD/LAGs. This approach utilises the three Funds for the funding of LD/LAG strategies in a way that builds synergy and integration across Fund activity and which ensures that CLLD delivers on its potential of fully utilising endogenous potential for local development. Currently LD/LAGs deliver a broad range of activities including supports for Enterprise development, labour market schemes i.e. Tus, Rural Social Schemes, LESN, supports for access to education, reskilling and lifelong learning and environmental programmes. The use of the multi-fund approach would assist in the continued development of such integrated local development strategies.

The creation of a specific investment priority for "community led local development" has been made to facilitate the programming phase for Member States and to give a greater flexibility to local groups in the design of their local strategy when choosing their priorities in terms of employment, education, social inclusion and the projects which relate to these priorities. All the above supports a strong case for adopting the CLLD multi-fund approach in Ireland's 2014-2020 Partnership Agreement.

Article 99 of CPR makes provision for territorial strategy which requires investments under more than one priority axis of one or more operational programme, then the action can be carried out as an 'Integrated Inter Territorial Investments' (ITI). Territorial employment pacts such as developed by Austria in the current ESF programme are an example of ITI use.

The importance of all developments being sustainable is highlighted in 'Our Sustainable Future – A framework for Sustainable Development for Ireland'⁷. "Sustainable development is about ourselves. It is about inhabiting a place where there is economic stability based on a model of national progress and development that respects the three core pillars of sustainability: the environment, the economic, and the social. There is a need to achieve positive economic, environmental and social outputs while at the same time ensuring equality and appropriate balance between the three pillars of sustainability". This vision for sustainability goes on to suggest that "The challenge is to mobilise this effort as part of a community of citizens working together to protect our natural environment now and into the future, in tandem with the essential economic and social progress on which our national wellbeing is dependent". From a Local Development perspective, CLLD and the work of Local Development Local Action Groups play a central role to further embedding this vision in communities and in ensuring communities have the opportunity to play their critical role in ensuring that all local development is appropriate and sustainable in the longer term.

In relation to the managing authorities of the various funds, it is critical that a 'whole of government' approach is taken to managing the various funds utilising the CLLD approach and coherence in working with the LD/LAGs nationwide. We believe that the managing authorities for ESF, LEADER and ERDF should determine a common working framework for managing the multi-fund CLLD for LD/LAGs in order to have an effective administration mechanism to support the implementation of CLLD local development strategies and in maximising the multi-fund opportunities for 2014 – 2020.

A provision for experimental pilot initiatives was included in both regional Operational Programmes's in 2007-13, but was not implemented due to the absence of a pre-funding mechanism through exchequer funds (National Strategic Report 2012 - Ireland). For ERDF and other Funds to make effective use of CLLD for 2014 - 2020, provision must be made for pre-funding of programme operations for the LD/LAGs.

⁷ <http://www.environ.ie/en/Publications/Environment/Miscellaneous/FileDownload,30452,en.pdf>

EU 2020 Headline Targets				
1. Employment <ul style="list-style-type: none"> 75% of the 20 - 64 year olds to be employed 	2. R & D / Innovation <ul style="list-style-type: none"> 3% of EUs GDP to be invested in R&D/Innovation by 2020 	3. Climate Change / Energy <ul style="list-style-type: none"> Reduce greenhouse gas emissions by 20%, (or even 30%, if conditions are right) lower than 1990 20% of energy from renewable 20% increase in energy efficiency 	4. Education <ul style="list-style-type: none"> Reduce early school leaving to below 10% At least 40% of all 30-34 year olds completing 3rd level education 	5. Poverty / Social Exclusion <ul style="list-style-type: none"> at least 20 million fewer people in or at risk of poverty and social exclusion
Smart, Sustainable and Inclusive Growth				

