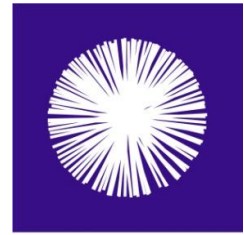


Consultation on European Structural Funds 2014-2020 Programme

Scottish Environment LINK Response

28th June 2013



Scottish
Environment

LINK

Scottish Environment LINK is the forum for Scotland's voluntary environment organisations, with over 30 member bodies representing a broad spectrum of environmental interests with the common goal of contributing to a more environmentally sustainable society.

Q1 – Are there other areas you think the Partnership Agreement should address?

Scottish Environment LINK welcomes Scottish Government's commitment to 'make the economy environmentally friendly and resource efficient' and believes the aspirations under this should be linked more specifically to a commitment to sustainability and adaptation to climate change.

The Partnership Agreement should address the need for genuine and participative third sector involvement at all levels of the delivery and management of the European and Structural Funds programmes and not just with schemes that are viewed centrally as the remit of the third sector. It is unclear how the Partnership Agreement will achieve true integration between the three Scottish Funds (SDPs) and we are particularly concerned that an undue focus on economic growth will weaken truly integrated commitments to social and environmental benefits from all funding under the Common Strategic Framework.

Q2 – Do you think these thematic objectives will best address Scotland's short-term and long-term challenges?

We are happy to support the objectives as set out but have concerns about a focus on economic growth at the expense of producing a sustainable economy fully adapted to climate change. We were alarmed to see that climate change adaptation is not being regarded as a priority for EU funding in Scotland at a time when multiple extreme weather events, the frequency of which will increase with climate change, have

caused incredible disruption and economic hardship, especially in land based industries. The thematic objectives need to be flexible enough to be tailored to both regional and local need and it may be necessary to build in scope to adapt these to changing needs and pressures within the life of the 2014-2020 funding programme.

Q3 – Do you think there any other thematic objectives which should be addressed?

We remain surprised and concerned, given Scottish Government commitments and policies elsewhere, that Climate change adaptation, Sustainable transport and Capacity building are specifically excluded. These are all areas where Scottish Environment LINK would anticipate that the Scottish Government would believe there should be a focus of effort. It seems to contradict initiatives elsewhere, as expressed in the [National Outcomes](#), in particular that

- We live in well-designed, [sustainable places](#) where we are able to access the amenities and services we need.
- We have strong, resilient and supportive [communities](#) where people take responsibility for their own actions and how they affect others.
- We value and enjoy our built and natural [environment](#) and protect it and enhance it for future generations.
- We reduce the local and global [environmental impact](#) of our consumption and production.

Any commitments to climate change seem exclusively focused on carbon reduction and sequestration rather than meaningful behaviour change and facilitating ecological adaptation.

Q4 – Do you think the Scottish Themed Funds will address Scotland's key challenges?

We would question whether the objectives set out in the Integration Strategy will truly lead to a sustainable environment across Scotland. We would be very concerned if environmental issues such as biodiversity, climate change adaptation, landscape, historic environment and the need for rural industry and ecological climate change adaptation became lost or subsidiary objectives after carbon reduction and resource efficiency – many measures that have substantial private as well as public benefit.

Q5 – How do you think the governance and delivery arrangements will impact on your sector?

Having a single Partnership Agreement Monitoring Committee (PAMC) may simplify management and address complementarity issues. However, we have concerns that the suggested structure and arrangements have the potential to obscure how EU funds are being allocated and drawn

down, and against which priorities or schemes and that it could lead to a sectoral approach to funding rather than the integrated one that Scottish Environment LINK are seeking. It must be within the PAMCs terms of reference therefore to be part of this priority setting and fund allocation, and this process and information must be transparent to the general public. It must also be possible to submit cross fund applications, that deliver multiple outcomes across the funding themes. Delivery of the outcomes and achievement of the targets will depend on the true integration of local decision making with centrally decided targets and decision processes. On this point, we suggest that there will also need to be sub groupings of any central PAMC that have more time to look at specifics of individual funds and schemes. One way to approach this would be to establish regional PMCs for each of the three themed funding streams. It may be possible to link these into a single PMC but the workload entailed would need to be considered.

Scottish Environment LINK is happy to contribute both centrally and at a local level where member organisations have a presence, but as voluntary sector organisations there may well be capacity issues and we would certainly not wish for duplication of effort. We believe it is important that there is third sector representation in discussing the management and outcomes of these programmes and that this will make sure that wider sectors and interests are not excluded from the programme delivery.

Q6 – How do you think the governance and delivery arrangements will impact on your organisation?

There is a need for environmental interests, including natural and built as well as landscape and access concerns, to be involved in the discussions to produce Development and Community Plans and Strategies. This is to cover national communities of interest as well as communities of place and of course related to local and central government and the democratic process. We believe that this will have social and environmental benefits to rural communities and wider society. The processes to achieve these benefits need to be built into the scheme architecture to avoid any confusion over outcomes and the ability to access funds to achieve them.

LINK member organisations have strong concerns to create and maintain stable, sustainable environments across Scotland and will support this process to the best of our ability and available resources.

Q7 – Are there any unidentified governance or delivery arrangements that could aid simplification of the future programmes and ensure that Structural Funds complement each other?

At a landscape-level LINK believes this process could be supported by the developing Scottish Land Use Strategy (LUS) and the pilot regional strategies being developed in Aberdeenshire and the Scottish Borders are an important step forward in prioritising actions. The Tweed Forum and Southern Upland Partnership are good examples of the successful initiatives that can be carried out under such collaborative partnership.

We also suggest there will be a need for regional PMCs given that it is already a complaint of the existing SRDP PMC structure that it is not possible, given time constraints, to focus on specific issues the SRDP should be addressing. We note that there is an increased emphasis on advice and support proposed under the SRDP 2014-2020 and we believe that the role of facilitators and specialist advice is crucial in achieving successful outcomes across all the funding streams. LINK member bodies, can provided relevant support, where appropriate.

Q8 – What other delivery options do you think would be feasible for delivering youth employment initiatives?

Several LINK organisations undertake initiatives that support youth employment and have been involved in previous skills programmes targeted at giving young people employment and life skills. While LINK itself would not be able to assist in such initiatives, member organisations may well be able to support such work.

Consideration might be given to the links between youth employment initiatives and support for new entrants in the agricultural sector as well as food and drink grants. As a key growth sector for Scotland, the food and drink industry and the land based industries that supply it should be looking to encourage young people in via a range of routes. Here, as elsewhere, agriculture should not be seen as separate to the rest of the economy but part of the opportunities for truly sustainable growth.

Q9 – What other measures could be taken to reduce the audit and control pressures?

Measures and grant priorities, application forms, monitoring and audit processes should be designed with the user in mind and not produced to simplify audit reporting. Overly bureaucratic procedures are a disincentive to participation and discourage individuals and organisations from seeking support. The focus must be on achieving outcomes not restraining applications.

This response is supported by the following members of Scottish Environment

LINK:

Archaeology Scotland

Association for the Protection of Rural Scotland

Butterfly Conservation Scotland

National Trust for Scotland

Ramblers Association Scotland

RSPB Scotland

Scottish Wildlife Trust

Woodland Trust Scotland

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