

## Consultation on the 2014-2020 Ireland Wales Cooperation Programme

### Consultation Response Form

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The responses to the consultation questions set out below will play an important part in the preparation of the final text of the 2014-2020 Ireland Wales Cooperation Programme, which we will be submitting to the European Commission later this year. Views are sought from all those with an interest.

### Contact details

Please send responses to the consultation to:

European Territorial Cooperation Unit  
Welsh European Funding Office  
Welsh Government  
Rhydycar  
Merthyr Tydfil  
CF48 1UZ

Or by email to: [IrelandWalesCrossBorderProgramme@Wales.GSI.Gov.UK](mailto:IrelandWalesCrossBorderProgramme@Wales.GSI.Gov.UK)

If you have any queries, please contact the team on the above email address.

Responses are sought by **31 July 2014**.

The following questions are designed to help structure the responses to this Consultation Document:

### Section 1: Programme Strategy

1. Do you agree that we have we identified the right challenges for the Ireland Wales Programme?

	x			
Strongly Agree	Agree	Neither agree nor disagree	Disagree	Strongly Disagree

Please add in any reasons for your response in the box below:

The challenges identified for the Ireland-Wales Programme are appropriate for the area. We welcome the recognition of the important role which the natural resources of the area, particularly the marine environment, have in achieving both economic and social benefits. However, we would urge the Programme to recognise that Sustainable Development and Climate Change are major challenges for the programme area which should be considered and integrated into all priorities.

2. Do you agree that the identified challenges are sufficiently focused to address the needs of the cross-border region?

	x			
Strongly Agree	Agree	Neither agree nor disagree	Disagree	Strongly Disagree

Please add in any reasons for your response in the box below:

Natural Resources Wales recognises the need to focus on specific needs for the area and consider these challenges to have realistic focus whilst offering a range of opportunities for potential applicants.

## Section 2: Thematic priorities

### Priority Axis 1 - Innovation

3. Do you agree that the specific challenges which this Priority Axis aims to address are the right ones to focus on for the Ireland Wales Programme?

		x		
Strongly Agree	Agree	Neither agree nor disagree	Disagree	Strongly Disagree

Please add in any reasons for your response in the box below:

We agree that the Challenges 2 and 3 (knowledge flow and improving innovative capabilities) are particularly relevant to this Priority.

However, we feel that Challenge 1 (utilising the potential of the Irish Sea) and Challenge 4 (Vulnerability to Climate Change) could be equally relevant. This would ensure that the economic importance of the natural resources of the programme area are fully recognised and integrated into all developments and that the risks posed by Climate Change are the focus of innovative actions.

4. Does the Specific Objective address these challenges clearly enough?

		x		
Strongly Agree	Agree	Neither agree nor disagree	Disagree	Strongly Disagree

Please add in any reasons for your response in the box below:

The Specific Objective addresses Challenges 2 and 3 adequately but as above, we feel that the Objective could also address Challenges 1 and 4. Challenges 1 and 4 could be addressed by requiring all projects within this Priority to consider and address Climate Change issues and by encouraging innovation utilising the maritime border between Ireland and Wales.

It should be noted that not all innovation will necessarily contribute to sustainable development. Natural Resources Wales would recommend that safeguards are put in place to ensure that any action supported by this Priority is required to undertake an integrated consideration of social, economic and environmental issues as part of the project development. This would align with the requirement of Welsh Government's Wellbeing of Future Generations Bill.

5. Do you agree that the types of Actions identified are relevant and sufficiently focussed to achieve the Specific Objective?

		x		
Strongly Agree	Agree	Neither agree nor disagree	Disagree	Strongly Disagree

Please add in any reasons for your response in the box below:

The Types of Actions are relevant and likely to achieve the Specific Objective but, as previously, we would welcome more focus on actions focussing on Climate Change and the maritime border.

Natural Resources Wales would recommend that both the implications of Climate Change and opportunities for mitigation or adaption should be considered as cross-cutting themes for all projects, as should wider Sustainable Development principles.

**Priority Axis 2 – Climate Change**

6. Do you agree that the specific challenges which this Priority Axis aims to address are the right ones to focus on for the Ireland Wales Programme?

x				
Strongly Agree	Agree	Neither agree nor disagree	Disagree	Strongly Disagree

Please add in any reasons for your response in the box below:

Challenges 1 and 4 (potential of the Irish Sea and vulnerability to Climate Change) are the correct focus for this Priority and we agree that Challenges 2 and 3 also have some relevance to this Priority.

7. Does the Specific Objective address these needs and challenges clearly enough?

	x			
Strongly Agree	Agree	Neither agree nor disagree	Disagree	Strongly Disagree

Please add in any reasons for your response in the box below:

The Specific Objective addresses the needs and challenges relevant to this Priority. As recognised in the consultation document, adaptation to climate change is of major importance to the economic, social and environmental well being of the Programme area and we welcome the opportunities offered by the Programme. We also welcome the reference to eco-system based approaches for adaptation to climate change.

8. Do you agree that the types of actions identified relevant and sufficiently focussed to achieve the Specific Objective?

	x			
Strongly Agree	Agree	Neither agree nor disagree	Disagree	Strongly Disagree

Please add in any reasons for your response in the box below:

Type of Action 4 (developing and implementing Adaptation Solutions) is relevant and sufficiently focussed to achieve the Specific Objective and we welcome this.

With regard to Type of Action 5 – Eco-innovation, whilst several of the actions proposed are relevant and focussed and likely to achieve the Specific Objective, we have some more detailed comment on the suggestion that investment could be used to develop prototypes. We welcome the potential of the Programme to facilitate the sustainable development of the emerging wave and tidal energy sector in the Irish Sea, which has recently been boosted with the announcement of a series of 'demonstration zones' by The Crown Estate for pre-commercial deployments and testing technologies.

However, developing and testing even just one prototype marine energy device could require a significant proportion of the funding available, for little or no wider benefit to the sector. A more efficient and equitable use of the available funding would be to focus on aspects of innovation and design to address some of the key potential environmental issues and impacts of wave and tidal devices. The high degree of uncertainty about the impact of these novel devices and technologies currently presents a challenge to consenting processes, and so developing innovative approaches to reduce or avoid such impacts could greatly facilitate commercialisation of the sector.

These key uncertainties and issues are well documented and, along with the corresponding key research and development priorities are summarised within a report recently commissioned by The Crown Estate (The Crown Estate / Aquatera. January 2014. Wave and Tidal Enabling Actions report: Consolidation of wave and tidal EIA / HRA issues and research priorities. Technical report. 51pp.).

We would therefore recommend that the marine energy elements of the Programme should seek to focus on the key issues detailed within this report, the learning from which can be transferred or extrapolated to other device types and locations so have much wider benefit.

In addition, Natural Resources Wales would expect sufficient environmental protection to be built in to these projects, regardless of whether they are taking place in a designated protected area, to ensure protection of marine biodiversity and habitats including the threat from non-native invasive species.

### Priority Axis 3 – Natural and Cultural Resources and Heritage

9. Do you agree that the specific challenges which this Priority Axis aims to address are the right ones to focus on for the Ireland Wales Programme?

X				
Strongly	Agree	Neither agree	Disagree	Strongly

Agree

nor disagree

Disagree

Please add in any reasons for your response in the box below:

We agree that this Priority should focus on Challenges 1, 5 and 6 in order to achieve the Specific Objective of sustainably realising the economic potential of the natural and cultural assets of the Programme area.

10. Does the Specific Objective address these needs and challenges clearly enough

	x			
Strongly Agree	Agree	Neither agree nor disagree	Disagree	Strongly Disagree

Please add in any reasons for your response in the box below:

The Specific Objective clearly addresses Challenges 1, 5 and 6 and recognises the potential value of the many natural and cultural assets of the Programme area. However, whilst the Objective recognises the importance of socially inclusive sustainable development we would welcome some specific reference providing opportunities for disadvantaged communities.

11. Do you agree that the types of actions identified are relevant and sufficiently focussed to achieve the Specific Objective?

x				
Strongly Agree	Agree	Neither agree nor disagree	Disagree	Strongly Disagree

Please add in any reasons for your response in the box below:

The Types of Action identified are relevant and sufficiently focussed to achieve the Specific Objective whilst not being overly restrictive. This should allow target groups to submit a wide variety of project types which are best suited to their particular socio-economic context.

## Overall Questions

12. Does the Programme as a whole address the needs and challenges identified for the programme area?

	x			
Strongly Agree	Agree	Neither agree nor disagree	Disagree	Strongly Disagree

Please add in any reasons for your response in the box below:

The Programme addresses the major challenges facing the Programme area and offers real possibilities for interventions which will bring about sustainable economic growth. We welcome the recognition given to the natural environment as an economic driver. However, the natural environment can be damaged by some interventions if insufficient safeguards are in place. Natural Resources Wales is keen to ensure that all necessary precautions are taken to avoid harm to habitats and species, and that where possible, all projects incorporate actions which will have positive environmental impacts. Natural Resources Wales would welcome the opportunity to discuss this further with WEFO.

13. No formal decisions have been made about the division of the money across the priority axes, however it is envisaged that Priority Axis 1 (innovation) will receive the largest percentage share of the programme allocation followed by Priority Axis 2 and Priority Axis 3. How would you weight the relevant importance of these three Priority Axes given the needs and challenges of the programme area?

Whilst the development of new products and prototypes (Priority 1) may require a substantial amount of investment, any project with a marine or maritime element is likely to have significant costs.

Priority 2 ToA 4 specifically targets sustainable management of the marine environment, ecosystems and biodiversity – this is unlikely to be possible without the use of survey boats etc. Priority 2 ToA5 includes pilot initiatives for the marine renewable energy sector – again this type of action will be very costly. Priority 3 includes maritime tourism development including tourism at sea.

Rather than division of budget purely by priority, we would suggest that WEFO should consider the locus of the project. Successful marine or maritime projects will need enhanced budgets to achieve the Specific Objectives of their relevant Priority.



14. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed in the sections above, please use the space below to report them:

Please add in any reasons for your response in the box below:

Natural Resources Wales welcomes the Ireland Wales Programme as a source of investment in the sustainable development of the Programme area and supports the Priorities and Objectives selected.

Natural Resources Wales particularly welcomes the opportunities recognised for the environment as a driver of smart, sustainable and inclusive growth.

However, Natural Resources Wales recognises the potential for projects to be detrimental to the environment or natural resources of the area. In light of this we would recommend the integration of environmental considerations into all decision making and project development. Project sponsors should be encouraged to engage with NRW at the earliest opportunity to ensure maximum environmental gains.

Natural Resources Wales would stress the need for a strong cross-cutting theme of Sustainable Development and would welcome further information and discussion on proposals for ensuring integration of the cross cutting themes and environmental protection across all Priorities.

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here: