

Briefing Note

03

AUTHORS: Rob Dhondt, Veerle Dossche

## NGO Participation in the Rural Development policy



Forest road in Czech Republic  
Image: Zdenek Postulka

Forests cover more than 42 per cent<sup>1</sup> of European Union (EU) land, almost as large an area as is covered by agricultural production. Most support for forest practices in the EU comes from Rural Development policy, the second pillar of the EU's Common Agricultural Policy (CAP).

On paper, the current Rural Development Regulation requires consultations to take place at different levels (known as the 'partnership principle'). In practice however, the input of stakeholders can still be improved.

Based on research and case studies from six EU countries,<sup>2</sup> this briefing note investigates the extent to which implementation of the 'partnership principle' has been successful.

## 1. The Rural Development Regulation – a history

In 2000, a process called the Agenda 2000 CAP Reform<sup>3</sup> split funding for agriculture into two pillars: Pillar one covered “market and income support measures”, and pillar two ‘rural development’. It is this second pillar that provides most financing for EU forests. The current Rural Development Regulation<sup>4</sup> (RDR) for the period from 2007 until 2013 was adopted in 2005. The Regulation regrouped and streamlined forestry measures with the aim of promoting better integration of forestry in rural development. The regulation includes over 40 possible measures of which a total of 20 have direct or indirect relevance to forestry.

These measures aim to contribute to the objectives of the RDR, grouped in the following four axes:

1. Improving the competitiveness of agriculture and forestry by supporting restructuring, development and innovation;
2. Improving the environment and countryside by supporting land management;
3. Improving the quality of life in urban areas and encouraging diversification of economic activity;
4. The leader community initiative, providing funds contributing to the three objectives for local action groups.

All Member States have developed national strategy plans in which they outline their national priorities for rural development. These national strategies are implemented through a series of measures outlined in rural development programmes.

It was up to the Member States to choose which measures to put forward for EU funding. Mandatory elements were:

1. At least ten per cent of requested funds needs to be spent under axes one and three; at least 20 per cent of requested funds under axis two and at least five per cent under axis four.
2. Member States must consult relevant stakeholders (including NGOs) in the development of national programmes.

3. Member States must match the EU funds with their own.

For each rural development programme (at Member State or regional level) a monitoring committee has been set up. The responsibility of the committee is to satisfy itself as to the effectiveness of the implementation of the rural development programme (article 78 of the RDR).

## 2. What does it say about the ‘partnership principle’ in the Rural Development Regulation?

Article six of the RDR highlights the importance that is assigned to consultation and participation:

*“[European Agricultural Fund for Rural Development] EAFRD assistance shall be implemented through close consultations (hereinafter partnership) between the Commission and the Member State and with the authorities and bodies designated by the Member State under national rules and practices, including ... any other appropriate body representing civil society, non-governmental organisations, including environmental organisations.”*

The article also explains that the partnership shall be involved in the preparation and monitoring of the national strategy plan and in the preparation, implementation, monitoring and evaluation of the rural development programmes. It goes on to say that Member States shall involve all appropriate partners at the various programming stages, with due regard being given to the “time limit set for each step”.

Participation of stakeholders is also foreseen in the monitoring committees, as stipulated in Article 77:

*“For each rural development programme, a monitoring committee shall be set up within a maximum of three months following the decision approving the programme. ... Its composition shall be decided by the Member State and shall include the partners referred to in Article 6(1).”*

### 3. Participation: reality on the ground

In 2008, FERN produced a report entitled 'Funding forests into the future? How the European Fund for Rural Development affects Europe's forests'.<sup>5</sup> The report examined which forestry measures were expected to be funded by rural development money. It also looked at NGO involvement in the preparation of the strategy plans and rural development programmes. It focused at the situation in six countries: Czech Republic, Bulgaria, Hungary, Portugal, Romania and Finland.

In reality, adherence to the participation principle varies across the six countries that were studied.

The process has not been entirely clear in any of the countries. In general, the problems that were raised can be summarised as follows:

- Environmental NGOs were not always represented in the development of the strategy plans or rural development programmes.
- There was a discrepancy between the number of seats allocated to environmental NGOs and the number of seats allocated to producers.
- Consultation processes were arranged at very short notice. In some cases, little publicity was given and in others the commenting period was too short.
- Not all issues or documents were open for discussion.
- Even where there was the opportunity to input into discussions, in some cases feedback was not taken on board.



Cork oak woodlands Tejo Estuary SPA in Portugal.

Image: Domingos Leitão

### Box 1: NGO involvement in the preparation of national strategy plans and rural development programmes

#### Bulgaria<sup>6</sup>

In preparation for national strategy plans and rural development programmes (RDPs), article six of the RDR has generally been adhered to in Bulgaria. The procedure during the preparation of the RDP as a whole included well organised consultation with the public. General discussions started well in advance. However, working groups on specific actions were set-up mid-2006, and this was too late to ensure a proper consultation process, which is highly relevant for the working group set for discussion of forestry measures. Its meetings were too late and there was little time for feedback. Finally, the outcomes of these meetings were not publicised, and the group was not properly coordinated.

#### Czech Republic<sup>7</sup>

In the Czech Republic, adherence to Article 6 was unsatisfactory. For example, environmental NGO participation in the development of the RDP was nonexistent. There was also no opportunity for the public to make written comments on any of the RDP drafts. The government organised regional seminars, but promotion of the seminars was poor and they are no substitute for a written consultation. The seminars only allowed for a brief discussion about basic principles and there was no opportunity to debate individual measures and their technical details. The lack of time also meant that a number of participants had no chance to speak.

Key stages of the Strategic Environmental Assessment (SEA)<sup>8</sup> also came so late in the process that it was difficult to input effectively. A public hearing came several days *after* the formal closure of the official government inter-service consultation (the final step before the proposal goes to the cabinet for approval). The deadline for public comments was five days after the hearing.

NGOs who had mailed written comments to the Ministry of Agriculture received brief government responses which in many cases were limited to a statement that their proposals had been rejected.

#### Finland<sup>9</sup>

Even though the RDR makes the importance of partnerships with environmental organisations clear, this was not put into practice in Finland. The preparation process for the Finnish RDP was so poor that the Finnish Association for Nature Conservation wrote several times to the Finnish authorities, stating that the partnership had failed at both the national and regional level. Concerns included:

1. the lack of NGO participation in the Strategy Working Group (environmental NGOs were only able to participate in some subcommittees);
2. the wide discrepancy between the number of seats for NGOs and the number of seats for producers;
3. the final version of the ex-ante evaluation<sup>10</sup> report was sent out too late and NGOs were not invited to the evaluation seminar or steering group so they could not express opinions on background information, content, etc.
4. the consultation round was very late and took place during the summer holidays, so no major changes were made anymore.

**Box 1 continued:****Hungary<sup>11</sup>**

In Hungary, civil society had not been involved in planning processes or implementation for a very long time. The Hungarian authorities therefore had to change their usual way of working during the drafting of strategy plans. As more and more strategic plans were drawn up – and especially when plans started to be elaborated for the European funds with the obligation of public involvement – the usual practice of the authorities had to change. Unfortunately, most of the authorities consider this requirement to be necessary only for reporting purposes.

In the RDP planning process, powerful producer groups were often involved in decision-making from a very early stage whilst environmental NGOs were only consulted about certain issues. For the current rural development documents, roadshows were organised to act as a form of public consultation but the results of these are doubtful. Strategic documents and plans were also available on the internet, but some documents were only available for a very limited period. For example, the national RDP was only available for five days. Some issues such as how the budget would be allocated were simply not open for discussion. However, the expert opinion of NGOs is being used in e.g. the forest-environment and Natura 2000 measures which were adopted after long consultation processes in which NGOs were represented.

The public participation process of the SEA was poor. Most important issues did not seem to be open for consultation and even where it was possible to input, very few comments were taken into account and no responses were given to submissions. The ex-ante evaluation was carried out without public participation and NGOs were not asked for their input.

**Portugal<sup>12</sup>**

Environmental NGOs were insufficiently involved in the processes of preparing both the national strategy plan and the RDP. NGOs could only be involved during the public consultation period of the RDP, the national strategy plan and the SEA. There was no participation in the ex-ante evaluation.

**Romania<sup>13</sup>**

Romania is one of the few countries covered by this study that properly adhered to Article six of the RDR. NGOs were able to take part in meetings about both the national strategy plan and the RDP. There were some problems at the beginning because meetings about the overall programme were few and poorly organised. Over time however, a more efficient and participatory style of consultation developed. Unfortunately, there were structural changes in the forestry department which meant consultations on forestry measures were much poorer compared with other measures.

The consultation on the SEA was almost nonexistent.

## Participation in monitoring committees

In 2010, FERN produced a second report, “What changes are needed? The implementation of EU’s rural development policy” which focused on how national RDPs – and more specifically their forestry measures – had been implemented in the same six countries<sup>14</sup> as “Funding forests into the future”.

The study also looked into the participation of NGOs in monitoring committees.

The report concluded that in all six countries, environmental NGOs are underrepresented on the monitoring committee. In some countries, the setting up of working groups has helped to involve NGOs in the implementation and follow-up of the RDPs, even though they are not always directly involved in the monitoring committee. There are also examples however of where NGO participation in monitoring committees is very poor. In some countries, monitoring committees’ work is ineffective.

### Box 2: NGO participation in monitoring committees

#### Bulgaria

The Bulgarian monitoring committee includes 46 members, two of whom are representatives of environmental NGOs. The monitoring committee’s work seems to be effective in terms of examining the results of the implementation and monitoring the quality of the programme implementation.

Permanent working groups have been established on the four axes of the programme. The main aim of these working groups is to assist the work of the monitoring committee and each working group includes several NGO representatives. In general, the working group’s procedures are effective and transparent. They have developed and proposed decisions to the monitoring committee that have significantly improved the programme implementation quality. Even though the monitoring committee is not obliged to take all the working group’s proposals into consideration, current practices show that in more than 80 per cent of cases, they are considered and approved. The monitoring committee has also established additional working groups to look at specific problems.

#### Czech Republic

Environmental NGOs only have one of the 38 seats on the monitoring committee. This is insufficient representation and means that environmental issues cannot be handled properly.

Working groups have been set up to deal with issues such as forestry-based measures, agriculture measures, and payments linked to the Water Framework Directive. Participation in the working groups is voluntary. The working groups set out preference criteria and make recommendations about public expenditure and total spending per measure.

#### Finland

There are around fifty members on the monitoring committee, and only two of these are environmental NGOs. In addition to the monitoring committees, there are a number of national working groups, and whilst not present at all of them, NGOs hold at least one seat in five of them. The working groups have provided an effective way to make complaints and practical proposals for improvements. It is remarkable that there is no special working group for forestry and forest biodiversity.

Even though there are still gaps in NGO representation, criticism during the previous programme period and at the beginning of this one resulted in positive changes which have seen NGOs gain more seats.

**Box 2 continued:****Hungary**

The Hungarian monitoring committee has 67 members, and two environmental NGOs were invited to be a part of it. The composition of the monitoring committee was raised as an issue during the rural development programme of 2004-2006, but no changes have been made since then.

The monitoring committee is not properly qualified to influence the way the RDP is run. This is due to not just its imbalanced composition but also to its operational procedures. In most cases decisions are made by written procedures, usually at very short notice. Votes can be cast by email, and anyone not voting is considered to have given approval to the managing authority's proposal. Usually 90 – 95 per cent of members do not vote at all. Since it was announced that working groups had been set up in the beginning of 2009, very little has been heard of them.

**Portugal**

The monitoring committee counts only one NGO. Moreover, the functioning of the committee is ineffective and it is hard to obtain proper information.

**Romania**

There are 36 members in the monitoring committee, including five organisations specialising in environmental issues and biodiversity conservation. The official consultation has been satisfactory, but actual partnership and communication has been weak since early 2009. Overall, political instability and administrative restructuring has led to a high rate of personnel change, and the expertise of NGOs is seldom drawn upon. According to the public administration, since the RDP was adopted, working groups have been established to elaborate working procedures and applicant guidelines for several measures. No official information has been given on the composition of the working groups.

## 4. Conclusion

The involvement of environmental NGOs in the preparation and monitoring of national strategy plans and rural development programmes has been poor. Despite there having been some improvements on the previous programming period, it is still unsatisfactory.

In order to improve the situation, civil society stakeholders should be given more opportunities to use their expertise and feed into the processes. The rural development policy should stipulate clear criteria as to how to ensure strong, effective participation from a wide and balanced section of stakeholders.

## Endnotes

1. Including other wooded land.
2. Bulgaria, Czech Republic, Finland, Hungary, Portugal and Romania.
3. The second pillar of the CAP was only formally created under the Agenda 2000 reforms. However, some of the measures which make up the current rural development policy of the CAP were already introduced in the years before.
4. Council of the European Union (2005): Council Regulation (EC) No 1698/2005 on support for rural development by the EAFRD.
5. FERN (2008). Funding forests into the future. How the European Fund for Rural Development affects Europe's forests. Synthesis report. [http://www.fern.org/sites/fern.org/files/media/documents/document\\_4198\\_4199.pdf](http://www.fern.org/sites/fern.org/files/media/documents/document_4198_4199.pdf)
6. FERN (2008). Funding forests into the future. How the European Fund for Rural Development affects Europe's forests. The case of Bulgaria. Vanya Ratarova and Veronika Ferdinandova. Bulgarian Society for the protection of Birds/Birdlife Bulgaria. [http://www.fern.org/sites/fern.org/files/media/documents/document\\_4178\\_4179.pdf](http://www.fern.org/sites/fern.org/files/media/documents/document_4178_4179.pdf)
7. FERN (2008). Funding forests into the future? How the European Fund for Rural Development affects Europe's forests. The case of Czech Republic. Zdenek Postulka. Hnutí Duha (Friends of the Earth Czech Republic). [http://www.fern.org/sites/fern.org/files/media/documents/document\\_4180\\_4181.pdf](http://www.fern.org/sites/fern.org/files/media/documents/document_4180_4181.pdf)
8. Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (also known as Strategic Environmental Assessment (SEA) Directive) has the objectives of providing a high level of environmental protection and contributing to the integration of environmental considerations into the preparation and adoption of plans and programmes. It aims to do this by ensuring that an environmental assessment is carried out of certain plans and programmes that are likely to have significant effects on the environment. SEAs need to be prepared of the rural development programmes funded under the current RDR.
9. FERN (2008). Funding forests into the future? How the European Fund for Rural Development affects Europe's forests. The case of Finland. Tapani Veistola. Suomen luonnonsuojeluliitto – Finnish Association for Nature Conservation [http://www.fern.org/sites/fern.org/files/mediadocuments/document\\_4182\\_4183.pdf](http://www.fern.org/sites/fern.org/files/mediadocuments/document_4182_4183.pdf)
10. Ex ante evaluation supports the preparation of proposals for new or renewed actions at EU level. Its purpose is to gather information and to carry out analyses which help to ensure that the policy objectives will be delivered successfully, that the measures used are cost-effective and that reliable evaluation will subsequently be possible. Article 85 of the RDR specifies what needs to be covered by the ex ante evaluation. The Strategic Environmental Assessments (SEA) have to be integrated into ex-ante evaluation.
11. FERN (2008). Funding forests into the future? How the European Fund for Rural Development affects Europe's forests. The case of Hungary. Gabor Figezky. WWF Hungary. [http://www.fern.org/sites/fern.org/files/media/documents/document\\_4190\\_4191.pdf](http://www.fern.org/sites/fern.org/files/media/documents/document_4190_4191.pdf)
12. FERN (2008). Funding forests into the future? How the European Fund for Rural Development affects Europe's forests. The case of Portugal. Domingos Leitao. Sociedade Portuguesa para o Estudo das Aves. [http://www.fern.org/sites/fern.org/files/media/documents/document\\_4186\\_4187.pdf](http://www.fern.org/sites/fern.org/files/media/documents/document_4186_4187.pdf)
13. FERN (2008). Funding forests into the future? How the European Fund for Rural Development affects Europe's forests. The case of Romania. Raluca Barbu. WWF Danube Carpathians Programme, Romania. [http://www.fern.org/sites/fern.org/files/media/documents/document\\_4188\\_4189.pdf](http://www.fern.org/sites/fern.org/files/media/documents/document_4188_4189.pdf)
14. FERN (2010). What changes are needed? The implementation of EU's Rural Development Policy. <http://www.fern.org/sites/fern.org/files/What%20changes%20are%20needed.pdf>

**Published by FERN, the campaigning NGO for greater environmental and social justice, with a focus on forests and forest people's rights in the policies and practices of the EU.**

1C Fosseyway Business Centre  
Stratford Road  
Moreton-in-Marsh, Gloucestershire  
GL56 9NQ UK  
t +44 (0)1608 652 895  
f +44 (0)1608 652 878

26 Rue d'Edimbourg  
B-1050 Brussels  
Belgium  
t +32 (0)2 894 4690  
f +32 (0)2 894 4610

e [info@fern.org](mailto:info@fern.org)

For more briefing notes visit <http://www.fern.org>

FERN is grateful to the following for providing the information and case studies from the individual countries: Veronika Ferdinandova and Vanya Ratarova (BSPB, Birdlife Bulgaria), Gabor Figezky (WWF Hungary), Domingos Leitao (SPEA, Portugal), Monia Martini and Raluca Barbu (WWF DCP Romania), Zdenek Postulka (Hnutí Duha, Czech Republic) and Tapani Veistola (FANC, Finland)

This briefing note was prepared with the financial assistance of the Dutch Ministry of Environmental and Spatial Planning (VROM) and the European Commission. The views expressed do not however imply the expression of any opinion on the part of any of the donors. VROM and the European Commission are not responsible for any use of the information contained within this briefing note.

