



**Public Consultation on
Border, Midland and Western (BMW)
Regional Operational Programme
2007-2013**

Submission from the
Western Development Commission
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Submission from the Western Development Commission (WDC) to the Public Consultation on the Border, Midland and Western (BMW) Regional Operational Programme 2007-2013

1. Introduction

The Western Development Commission (WDC) welcomes this opportunity to make a submission to the preparation of the Border, Midland and Western (BMW) Regional Operational Programme 2007-2013.

The WDC is a statutory body, under the aegis of DCRAGA,¹ whose remit is to promote, foster and encourage economic and social development in the Western Region.² The WDC works in co-operation with national, regional and local bodies involved in western development to:

- review and monitor development policy and make appropriate proposals to government departments and agencies;
- identify and implement development initiatives, or facilitate their implementation by other relevant organisations; and
- assist businesses, social enterprises and projects by managing the WDC Investment Fund amounting to €34 million of exchequer funding.³

The WDC has built up considerable expertise in regional development based on research, analysis, and practice from its initiatives in tourism, organic agri-food and renewable energy.⁴ Through this work, the WDC seeks to ensure that government policy responds to the needs of the Western Region as regards infrastructure investment, exploitation of natural resources, enterprise and rural development.

In this context, the WDC has made detailed submissions to the Department of Finance outlining our proposals for the National Development Plan 2007-2013, and to the Department of Agriculture and Food, and DCRAGA outlining our proposals for the Rural Development Programme 2007-2013.⁵ As one of the requirements of the BMW Regional Operational Programme 2007-2013 is complementarity with these other programmes, the proposals contained in this submission are consistent with our proposals made elsewhere.

¹ Department of Community, Rural and Gaeltacht Affairs.

² Counties Donegal, Sligo, Leitrim, Roscommon, Mayo, Galway and Clare.

³ For more on the operation of the WDC Investment Fund see www.wdc.ie

⁴ See: Blueprint for Investing in the West: Promoting Foreign Direct Investment in the West (WDC, 1999); Blueprint for Tourism Development in the West: An Action Plan for Rural Areas (WDC, 2000); Blueprint for Organic Agri-Food Production in the West (WDC, 2001); To Catch the Wind: The Potential for Community Ownership of Wind Farms in Ireland (WDC, 2004).

⁵ Copies of these two submissions can be downloaded from www.wdc.ie

We do wish to stress that the rationale underlying EU cohesion policy is to help lagging regions to catch up and so address regional imbalances. Thus, measure adopted as part of the BMW Regional Operational Programme should be aimed explicitly at accelerating development in areas where the BMW region lags behind.

The WDC also believes that the results of the BMW Regional Foresight Exercise⁶ should form the basis for a new strategy for the development of the BMW region over the course of the Regional OP 2007-2013. We have endeavoured to ensure that our proposals below are consistent with the recommendations from the foresight exercise.

This submission is organised under the four areas identified in the draft European Regional Development Fund (ERDF) Regulation as being eligible for co-financing under the new Regional Operational Programmes: innovation and knowledge economy; environment and risk prevention; transport and telecommunications access; and sustainable urban development. The final section contains a number of recommendations in relation to the use of targets and indicators within the Regional OP.

⁶ BMW Regional Assembly (2005), *New Challenges, New Opportunities: Report of the Border, Midland & Western Regional Foresight Exercise 2005-2025*

2. Innovation and the Knowledge Economy

Given the fact that the BMW Regional OP 2007-2013 will be funded under the Regional Competitiveness and Employment Objective of the ERDF, funding to promote innovation and the knowledge economy will be central.

Funding under this Objective is mainly aimed at achieving the goals of the Lisbon Strategy which was relaunched in 2005 with a renewed focus on growth and jobs.⁷ **Ireland's Lisbon Agenda National Reform Programme,⁸ which sets out how the Lisbon goals are to be achieved in Ireland, is very comprehensive at a national level but does not have a regional perspective.** Given the considerable regional variation in innovation and knowledge capacity, the Lisbon goals will only be achieved if programmes are put in place to meet the particular needs of the regions. The BMW Regional OP presents an opportunity to do this.

However, we wish to stress again that given the relative scale of the resources available under the Regional OP compared with the NDP 2007-2013, the Regional OP alone cannot be expected to deliver the Lisbon goals within the BMW region. Measures tailored to the needs of the region must also be incorporated within the NDP. The ERDF monies should be used to support measures that can accelerate regional convergence.

The specific areas that the WDC believes should be funded under the BMW Regional OP 2007-2013 in order to create an innovative, knowledge-based and entrepreneurial economy within the BMW region are:

1. **Strengthen the research capacity** of the region's higher education institutions in those fields where research competence already exists. There should be particular focus on those fields which are of relevance to the regional economy such as biomedical engineering, ICT, marine and environmental science. The role of NUI Galway is particularly important in this respect.
2. **Applied research in the Institutes of Technology (IoTs)** should be supported. This should be tailored to research and education areas that are critical to the future of the regional economy and where the region has natural advantages. Funding should also be flexible enough to allow IoTs absorptive capacity to be enhanced and to promote collaboration with enterprise.
3. **Networking** between third level institutions, enterprises (foreign and indigenous) and the public sector should be supported. Networking is recognised as having played a role in the success of Galway city and there now needs to be active support for the development of such networking activity throughout the rest of the BMW region and also across the border. Networking is an important means of promoting innovation in all sectors and should not be seen as exclusively related to high-tech, knowledge intensive enterprises. The Green Box tourism project (see case study below) is an

⁷ Communication to the Spring European Council, 2005, Working together for growth and jobs: A new start for the Lisbon Strategy; Communication to the Spring European Council, 2005, Integrated Guidelines for Growth and Jobs 2005-2008

⁸ Department of An Taoiseach (2005), Lisbon Agenda, Integrated Guidelines for Growth and Jobs: National Reform Programme, Ireland

example of successful networking within the tourism sector. A practical example of networking would be where an accommodation provider, an outdoor activity enterprise and a restaurant co-operate in order to provide and market a complete tourism package.

4. The ESRI has warned of the danger of an exclusive science, technology and engineering focus in R&D investment.⁹ **For many enterprises, in particular in the services sector, innovation will not come from technological research but rather from business process and non-technological innovation.** Given the structure of enterprise in the BMW region, characterised by a lower level of R&D activity,¹⁰ improving knowledge and innovation capacity through means other than in-house R&D should be a priority under the BMW Regional OP 2007-2013.

Venture Capital

The WDC operate the WDC Investment Fund which became fully operational in 2001.

At present, the WDC is the only Irish state agency that has received EC approval under the State and Risk Capital Communication (SARC) guidelines. This approval allows the WDC, uniquely, to provide equity investment for working capital purposes. The Fund can support businesses along each stage of development and investments range from €100k to €1 million (typically €300k to €1m). The majority of projects supported to date are in the seed or early stage of development. The WDC is currently engaged in discussions with BMW RA executives regarding venture capital funding for businesses in the context of the regional operational programme.

⁹ Economic and Social Research Institute (2005), Medium Term Review 2005-2012 (p. 102)

¹⁰ BMW Regional Assembly (2003), Audit of Innovation in the BMW Region

3. Environment and Risk Prevention

One of the key strengths of the BMW region is its high quality and scenic environment which contributes to the high quality of life available in the region. Protecting the integrity of the environment, as well as ensuring that the region gains maximum benefit from this resource will be an important element of the Regional OP.

The two areas which the WDC believes should receive particular attention are the promotion of natural assets as potential for the development of sustainable tourism and the stimulation of renewable energy production. The WDC is actively involved in both of these areas and our proposals are based on this experience.

3.1 Sustainable Tourism

The tourism product in the BMW region is predominantly rural. There are a limited number of urban centres with the capacity to attract tourists in significant numbers, such as Galway city. Rural tourism relies heavily upon the quality of the natural environment and there are particular forms of tourism e.g. walking, angling, ecotourism, in which the environment is the key resource.

The WDC has been involved in promoting sustainable tourism since its establishment. Its 2000 report *Blueprint for Tourism Development in the West: An Action Plan for Rural Areas* emphasised the need for a sustainable approach to rural tourism development. It notes that

*A sustainable approach to tourism development seeks to reconcile tensions between the people and environment of the host areas and the needs of visitors and the tourism industry, so as to minimise environmental and cultural damage, optimise visitor satisfaction, and maximise long term economic growth for the region.*¹¹

This approach should be the starting point for any measures to support sustainable tourism under the BMW Regional OP.

The WDC, through the Western Development Tourism Programme (WDTP),¹² has been involved in a number of initiatives which promote sustainable tourism in the Western Region. These include the Green Box project, *Walking in the West* and the WDTP training initiative.¹³ Our proposals for support for sustainable tourism under the BMW Regional OP are based on this experience.

¹¹ WDC (2000), *Blueprint for Tourism Development in the West: An Action Plan for Rural Areas* (p. 33)

¹² The WDTP is a partnership aimed at promoting strategic tourism initiatives across the Western Region. The WDTP is chaired by Fáilte Ireland. Its members include the Department of Community, Rural and Gaeltacht Affairs, WDC, Shannon Development, Ireland West Tourism, North West Tourism, Department of the Environment and Local Government, Údarás na Gaeltachta, ITIC, Leader and IT Sligo.

¹³ The **Green Box** project is described in the case study below. **Walking in the West: A Step-by-Step Guide** was published in 2005 and proposes a new integrated development process that will deliver a world class walking product, support the commercialisation of the walking product in the Western Region and increase visitor numbers. WITW deals with long-distance walks where tourists remain in rural areas overnight rather than looped walks from large urban centres. The **WDTP training initiative** is a partnership between the WDTP, IT Sligo, six Leader companies and the private sector. The initiative is a

1. Funding should be made available to promote a **spatial approach** to tourism development. Support should be provided to clusters of product providers across counties to deliver themed niche tourism products which complement the natural assets of the area e.g. ecotourism, food, walking. Support could be provided in cases where there is an inter-county development plan for the area, evidence of buy-in from local authorities, public, private and community sectors, and details of an overall delivery mechanism to proactively drive the development of the themed area. The Green Box project (detailed below) has proven that this approach is effective and is a good example of the type of tourism project envisioned in the ERDF Regulation. Under current funding structures however this project qualified for support only through cross-border funding mechanisms. It would not have received funding if it were not located in a border area. The new BMW Regional OP should incorporate funding measures to support area-based projects of this nature.
2. Innovative product development for **activity and special interest holidays** should be supported by stimulating entrepreneurs and communities to develop world class tourism products better suited to meeting the needs of customers visiting rural areas. Specific measures are required for the development of rural-based tourism products such as long distance walking (which encourages visitors to stay in rural areas), ecotourism and marine ecotourism, adventure and water sports tourism, and innovative traditional heritage and culture products including Irish music, dance, sport and language.

Case Study: The Green Box – Realising the Ecotourism Potential of the West

To date, Ireland has not realised the potential of the green or ecotourism market to any great extent. Given the ‘green’ reputation of the West of Ireland there is a significant opportunity to develop a niche tourism product. Accordingly, the cross-border Green Box project was initiated in 2002 and represented Ireland’s first integrated ecotourism project.

The Green Box aims to deliver environmentally sustainable tourism products, accommodation and attractions. Such tourism activity will have minimal impact on the ecology of the area, be of maximum benefit to the local communities and meet the needs of the environmentally-conscious visitor. The Green Box encompasses an area covering all of Leitrim and Fermanagh and parts of Donegal, Sligo and Cavan.

The Green Box project was initiated by the Western Development Tourism Programme (WDTP), a multi-agency steering group established to implement the recommendations of the WDC’s *Blueprint for Tourism Development in the West*. The WDTP played a key facilitation role between the public, private and community sectors in the development of the initial plan, the co-ordination of funding applications and the establishment of the

tailor-made 80 hour training programme providing tourism product providers with an accredited course – National Certificate in Tourism Management & Marketing. A new course National Certificate in Eco Tourism has just been delivered in the Green Box and will be delivered now throughout the region.

Green Box Board. Two members of the WDTP are members of the Green Box Board representing Fáilte Ireland and the WDC.

The Green Box has evolved into an independent project with a CEO and six full-time staff based in Manorhamilton, Co Leitrim. Funding of €3.1 million has been secured for the project for the period to early 2008.¹⁴ The Green Box project is focused on product development and supports all stages in the tourism development process from training, through product development, certification and marketing.

- **Training:** A new National Certificate in Ecotourism has been developed by IT Sligo in conjunction with the WDTP and been delivered to 20 providers within the Green Box area. The providers were supported to participate on this course by the local Leader organisations.
- **Product Development:** The Green Box project administers a capital development programme of €1,162,500 which provides grant aid to private or community-owned tourism related businesses in the area. Businesses that can access funding under this programme include eco-friendly accommodation, organic or specialist food producers, restaurants, activity holiday providers, specialist tour operators, craft businesses and others. The programme will also fund two flagship capital investment projects utilising eco-friendly building practices that could serve as models of good practice.
- **Networking and Certification:** The Green Box Network aims to assist product providers within the Green Box to meet 'green' standards through training sessions and mentoring for network members. Training is currently underway to allow accommodation providers to meet the European eco-label – the EU Flower. Twenty-two providers in the Green Box will receive this label in 2006, the first on the island of Ireland. The Green Box is also developing a green certification scheme for restaurants and visitor attractions within the area.
- **Marketing:** The Green Box is also involved in marketing of the area. This includes a website www.greenbox.ie as well as direct advertising of packages within the area.

3.2 Renewable Energy

Renewable energy production can create economically and environmentally sustainable enterprises and play an important role in the provision of employment opportunities in rural areas. Ireland is committed to substantially reducing its CO₂ emissions and to ensuring that at least 13.2% of its electricity generating capacity is from renewable sources by 2010.¹⁵ There is also likely to be an increased focus on security of supply and the use of indigenous energy sources for generation. The greatest potential for renewable generation is likely to be in the least developed areas of the country, including parts of

¹⁴ All funding was received from cross-border programmes INTERREG and PEACE II.

¹⁵ Directive 2001/77/EC on the promotion of electricity produced from renewable energy sources in the internal electricity market.

the BMW region, where there are the opportunities to make best use of natural resources such as wind, wave power and biomass production.

The WDC has investigated how the economic contribution of renewable energy development to the local economy and rural development can be maximised through increased levels of community and small-scale participation. This resulted in the publication of *To Catch the Wind: The Potential for Community Ownership of Wind Farms in Ireland* in 2004. The WDC is currently engaging with key interests from the public and private sectors and examining the potential for bioenergy¹⁶ to promote economic development within the Western Region.

The WDC believes that the following areas should be supported under the BMW Regional OP. Supports should be additional and complementary to national programmes and targeted at accelerating development of renewable energy in the BMW region.

1. **A co-ordinated information and awareness programme** on renewable energy technologies should be rolled out across the region with complementary local initiatives. This would be an opportunity for enhanced co-ordination between the various public and private organisations involved in the promotion of renewable energy in the region.
2. **Support for the establishment of supply chains within the bioenergy sector.** Given the fact that certain elements of the bioenergy market e.g. pulpwood from forestry, are most economically viable if there is a cluster of consumers relatively close to the supplier, the development of critical levels of local demand also requires support. Support for community-led projects aimed at developing both supply and demand in the biomass sector should be considered.
3. In general, biomass equipment is capital intensive. It can be difficult to compete with fossil fuel technologies on a capital cost basis. This can result in a higher investment risk for financial investors. Physical capital supports through **capital grants** for harvesting/processing and transport equipment, and strategically located wood fuel depots would stimulate supply in the biomass sector.
4. Such capital programmes will be more effective if promoted through locally based development agencies such as has happened in Austria and Denmark where the biomass sector has flourished through adoption of the **co-operative model** with the establishment of Energy Supply Companies. Support for the adoption of the co-operative model in the biomass sector in the BMW region should be included in the new BMW Regional OP.

¹⁶ Bioenergy is energy which is produced from biomass. Biomass incorporates biodegradable wastes (e.g. wood industry residues, forestry residues, biogas from agriculture wastes, landfill gas and the organic component of municipal solid waste) and purpose grown energy crops (e.g. short rotation coppice, rape seed). Bioenergy can be used to produce heat, electricity and transport fuels (the three main modes of energy use).

4. Access to Transport and Telecommunications Services of General Economic Interest

The importance of access to transport and telecommunications services within the BMW region has been highlighted for many years by the WDC as well as the BMW Regional Assembly, regional and local authorities, state enterprise agencies, business organisations and many other groups concerned with regional development. The ten-year transport strategy Transport 21 and the NDP will be the main mechanisms for enhancing the transport and telecommunications services within the region over the coming years and the WDC has made recommendations in this regard. Support under the BMW Regional OP should be complementary to these programmes and aim to address particular gaps.

4.1 Transport

In relation to road infrastructure, Transport 21 mainly relates to primary national routes. The BMW Regional OP could provide a useful tool to ensure that smaller urban centres and more rural locations receive upgraded road linkages, particularly to link with other modes of transport e.g. airports, railway hubs. This would promote the development of the rural economy and a more even distribution of economic development across the region.

The WDC believes that the BMW Regional OP could support the following:

1. **Regional roads** which have not seen much improvement over the course of the current NDP and are in urgent need of upgrading. Transport 21 does not include reference to these routes. Within the Western Region they would include
 - N16 linking Sligo with Enniskillen
 - N61 linking Boyle with Roscommon and Athlone
 - N60 linking Roscommon with Castlebar
 - N63 linking Roscommon with Galway
 - N84/N58 linking Galway with Castlebar and Ballina.
 - The Frenchpark to Tulsk section of the N5 (incorporating Rathcroghan) is in urgent need of upgrading. However, this area is of particular archaeological significance and little progress has been made on plans for this section. Until this issue is resolved it is vital that alternative routes which link the N5 and N4 be upgraded. The relevant routes are the R370 between Frenchpark and Carrick on Shannon and the N61/R368 between Bellanagare and Carrick on Shannon.
2. Enhancing connections – road, rail and bus – to international air access points is necessary if the full benefits of improved direct international air access are to be realised, particularly in rural areas of the BMW. Ireland West Airport Knock is served by part of the Atlantic Road Corridor and the N5 road, upgrades of which are included in Transport 21. Access to the airport from more rural areas of the region however depends upon secondary roads not included in Transport 21 e.g. N83 from

Ballyhaunis, R331 from Ballinrobe. The BMW Regional OP should incorporate **funding for upgrading of secondary regional roads which link rural areas with Ireland West Airport Knock.**

3. The **Western Rail Corridor** provides a radial link with the main railway lines serving the BMW region. Transport 21 contains a commitment to the partial reopening of the line as far as Claremorris by 2014. The cost of re-opening the section to Claremorris, at €168 million,¹⁷ is less than the shortfall in the public transport expenditure in the BMW region under NDP 2000-2006. As all of the land is in public ownership this is a project that could be progressed quickly. The WDC believes that the section to Claremorris should be completed by 2010 and the remaining section from Claremorris to Collooney by 2013. We believe this should be funded under the NDP, however if there is any opportunity for the BMW Regional OP to contribute towards expediting the early completion of this project, this should be included.

4.2 Telecommunications

The availability of a modern telecommunications infrastructure in the BMW region is essential to attracting and sustaining investment and maintaining competitiveness. Quality telecommunications infrastructure and services at an affordable price to customers are as crucial to development of the BMW region today as rural electrification was in the 1940s and 1950s.

There exists in Ireland a spatial digital divide with major regional differences in access to broadband. The WDC highlighted this in its 2002 report *Telecommunications in the Western Region*. The recent Forfás Benchmarking Report shows that there has not been a narrowing of the gap since then, with rural coverage from DSL the second lowest in the EU-15 at just 38% of the population. The gap in DSL provision in smaller centres and in rural areas is not made up by the greater availability of broadband based on other technology platforms. Various government sponsored broadband initiatives, such as those funded under Clár and the County and Group Broadband Scheme (CGBS) are based almost entirely on wireless or satellite technology. Experiences with such schemes have given rise to a set of difficulties including access to and cost of backhaul (linkages to the national network), lack of competition among local suppliers and leadership and technical competence in communities.

Given the limited progress to date in providing broadband services to rural areas, the WDC makes the following proposals as to how the BMW Regional OP can contribute in this area:

1. The WDC believes that the only realistic way of addressing the digital spatial divide is for the Government to make a strategic commitment to broadband as a basic utility. They should then develop a national strategy to achieve 100% broadband coverage (as in Northern Ireland) and proceed to put in place the technical means to deliver it through private and public investment. The BMW Regional OP could provide some

¹⁷ Report of the Expert Working Group on the Western Rail Corridor, May 2005

support for the implementation of such a strategy in the BMW region by **supporting broadband projects in rural areas.**

2. Clearly, demand for services will drive private sector investment in broadband technologies and services. There is a need to stimulate awareness among SMEs, micro enterprises and residential users. **Locally based ICT initiatives which combine demonstrations, training and use of IT equipment should be supported.** This would encourage adoption of ICT and demand for broadband by local firms and rural businesses, and enable them to benefit from productivity gains from e-business and e-commerce. Such initiatives will also address e-exclusion. To maximise their versatility and penetration into rural areas, these could be based on a well-equipped 'mobile facility' which could efficiently deliver demonstrations and skill training and then move to another location.¹⁸ The BMW Regional OP could provide funding for such mobile facilities.

¹⁸ One example of this would be the Computer Club House project sponsored by the Intel Corporation. Another example is the BT Broadband Studio see www.btireland.ie/broadband

5. Sustainable Urban Development

The BMW region is predominantly rural with Galway the only city. There are five gateways (Galway, Sligo, Letterkenny, Dundalk and Athlone-Mullingar-Tullamore) and four hubs (Tuam, Ballina-Castlebar, Cavan and Monaghan). Beyond the gateways and hubs the BMW has a large number of small rural ‘market’ towns, including county towns. The economies of those beyond commuting distance from larger employment centres have a high dependence on agriculture, traditional manufacturing, local and public services.¹⁹

Each level of urban centre, from villages to cities, provide different services and consequently have very different needs. The NSS emphasises the functional relationships between different spatial units – from cities to households²⁰ and notes the services – both hard and soft infrastructure – provided at each level. This illustrates that gateways and hubs would require different supports to smaller towns and villages.

The WDC believes that the BMW Regional OP should support the following:

1. **A specific investment fund aimed at developing the gateways and hubs across the region.** Assistance under should a fund should be provided for projects which support agreed local development strategies and the Regional Planning Guidelines. Such projects should clearly contribute towards gateways and hubs fulfilling their objectives as set out in the NSS. Particular priority should be given to projects which, in addition to bringing benefit to the individual gateway or hub, would also contribute to developing positive linkages with its rural hinterland.
2. **Smaller towns and villages should also have access to a measure aimed at creating sustainable economic enterprises.** Employment in many smaller towns is dependent upon construction, agriculture, traditional manufacturing and local services. In addition commuting is becoming an increasingly important aspect of the employment structures of smaller towns. As employment in agriculture and traditional manufacturing is in decline and the long term sustainability of construction employment is questionable, it is likely that an increasing share of the populations of smaller centres will have to commute. It is for this reason that we believe that a measure for such smaller urban centres to encourage the development of local enterprises should be included in the BMW Regional OP.

¹⁹ WDC (2003), Jobs for Towns: Small and Medium-Sized Towns on Radial Routes in the Western Region

²⁰ The National Spatial Strategy 2002-2020, see Figure 5.1 p. 113 for example.

6. Targets and Indicators

Adopting targets can help to give clarity to the BMW OP 2007-2013 and to the measures within it. It is useful to have both high level and specific time-bound targets against which success can be measured. Measurement of progress (using both indicators and evaluations) is important both in managing the Plan's implementation and also in allowing areas of difficulty to come to light early on.

The BMW OP 2007-2013 needs to have clear targets which succinctly express its overall aims and what it is trying to achieve, before developing targets and indicators.

There is also a need for specific targets under each measure. The WDC believes that for all public expenditure programmes, and particularly the National Development Plan 2007-2013, it is important to introduce a set of **regional targets** for a wide range of government departments and agencies. This will ensure a coherent way of measuring and implementing a policy of balanced regional development. It will also be necessary to strengthen the availability and use of regional indicators, and to ensure participation of regional interests in setting targets and monitoring their achievement. Time-bound targets have been found to be effective in ensuring that projects are progressed efficiently and this can be particularly important for focusing attention on regional projects.

The WDC believes that the development of **appropriate indicators** is crucial. Indicators will not only allow the measurement of progress and success, but the selection of indicators inevitably defines what is considered important in the policy and creates targets which will receive particular focus and effort.

The WDC would expect that specific indicators should be associated with each measure, but it is important that these indicators are as closely related to the actual focus of the measure as possible. Where such indicators are set at too high a level it can be difficult to directly relate changes in the indicators to the specific measures.

In addition to the use of indicators for the management of the Programme, it is also important that there is regular and robust evaluation of both individual programme elements, and of horizontal issues (e.g. rural development, gender) as well as the evaluation of the achievement of higher level goals (such as balanced regional development, competitiveness etc.). Such evaluation should permit change and adjustment to measures and budgets in response to identified problems e.g. shortfalls, underspends over the course of the BMW Regional OP 2007-2013.

7. Concluding Comment

The WDC is happy to provide further information or examples in relation to this submission, should they be required. We look forward to participating further in this consultation process and in the development of the BMW Regional Operational Programme 2007-2013.

**Western Development Commission
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