

Dormant Accounts Fund - Northern Ireland

Comments by

Northern Ireland Environment Link

30th December 2019

Northern Ireland Environment Link (NIEL) is the networking and forum body for non-statutory organisations concerned with the natural and built environment of Northern Ireland. Its 65 Full Members represent over 100,000 individuals, 262 subsidiary groups, have an annual turnover of £70 million and manage over 314,000 acres of land. Members are involved in environmental issues of all types and at all levels from the local community to the global environment. NIEL brings together a wide range of knowledge, experience and expertise which can be used to help develop policy, practice and implementation across a wide range of environmental fields.

These comments are made on behalf of Members, but some members may be providing independent comments as well. If you would like any further information on any aspect of this submission we would be happy to help. For further information please contact

Malachy Campbell
Senior Policy Officer
NIEL
89 Loopland Drive
Belfast
BT6 9DW
P: 028 9045 5770
E: malachy@nienvironmentlink.org
W: www.nienvironmentlink.org

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General Comments

Northern Ireland Environment Link (NIEL) welcomes the consultation on the use of funds from the Dormant Accounts Scheme in Northern Ireland and commends the Department of Finance and The National Lottery in their efforts to obtain public views before making decisions on how the fund should be utilised.

NIEL is the forum and networking body for non governmental organisations (NGOs) interested in the natural and built environment of Northern Ireland (often referred to as the environmental NGO sector or “eNGO sector”). NIEL advocates for a Dormant Accounts Scheme that helps support the eNGO sector in the delivery of environmental services and activities. The eNGO sector offers a wide range of important and valuable services to Northern Ireland, including, but not limited to: designated site management, environmental education, wildlife conservation, habitat restoration, conservation of our built heritage, provision and maintenance of spaces for outdoor recreation.

The value which the eNGO sector can provide is clear, in regard to value for money, efficiency, effectiveness, improved delivery of services and wider public benefit. For example, according to the 2007 report, “*Valuing our Environment*”,¹ economic activities related to the natural environment of Northern Ireland contribute £573 million to the regional economy and those environment-related economic activities supported 32,750 full-time equivalent jobs. Furthermore, a 2012 report on the economic value of Northern Ireland’s historic environment concluded that it generates £522 million annually and creates 10,000 jobs². The third sector provides an important addition to existing government services and in some cases has had to step in to provide (in whole, or in part) services formerly provided by government.

Unfortunately there has been a significant lack of availability of funds for work by the community and voluntary sector recently, and a significant decrease is anticipated in the near future as we lose access to European funding after Brexit, on top of cutbacks in government spending in Northern Ireland. As such, the Dormant Accounts Scheme could provide an important opportunity for eNGOs to obtain valuable additional funding.

Grants

Generally, only charitable, community or not-for-profit organisations should be allowed to apply for grants and the funds should be prioritised for these sectors which offer excellent value for money and efficient delivery of outputs and which meet the agreed criteria established for evaluating potential applications. NIEL does not have a view on the size of grants that should be made available or how long the grants should be for, though multi-year grants would be better, as that would offer greater security for the relevant projects and organisations that manage and implement those

¹ <https://www.daera-ni.gov.uk/sites/default/files/publications/doe/valuing-our-environment-summary-report.pdf>

² https://www.nienvironmentlink.org/cmsfiles/policy-hub/files/documentation/Built/study_of_the_economic_value_of_ni_historic_environment_may_2012.pdf

projects. Those involved in the selection of projects should ensure that projects meet identified social and environmental goals and targets as identified in existing policies and strategies (see the paragraph on sustainability for more information on NIEL's thoughts on potential selection criteria for applications). This requires work on the application forms and procedures to facilitate those in the decision making role to have the necessary information.

Loans

Loans can be a great way to increase the value and impact from the moneys available, and so NIEL believes that loans should be made available to those organisations that would like to take advantage of a loan facility. Any loans made should be at a suitably low interest rate, preferably below or at the Bank of England base rate. Allowing for variety is essential to ensure the best quality of projects are funded, and accordingly both revenue and capital funding and a mixture of grants and loans is advisable. Separate allocations for Grant and Loan funds would be advisable, as in most cases the projects will be applying for one or the other. Neither capital nor revenue funding should be precluded to allow the best projects to be selected.

Sustainability

These funds offer an excellent opportunity to fund projects which might otherwise not take place. Clear and definite criteria are needed to ensure a fair and equitable mixture of types of projects and which organisations are eligible for funds as it is likely that demand will far outstrip the available funds. It is important that social and environmental projects are also eligible for funding and that the criteria ensure a fair allocation of funds between sectors.

The information provided on the fund states that "*organisations are sustainable if they have financial flexibility and longevity*", this seems to equate sustainability to an ability of an organisation to be on a sound financial footing in the medium to longer term. True sustainability however means something different, and not just being on a sound financial footing in the medium to longer term, but sourcing material/component parts from renewable sources and reducing or eliminating negative impacts. Sustainable development in that context includes a consideration of the economic, environmental and social implications of a product and NIEL hopes that the National Lottery will fund projects that are truly sustainable, in that context. The National Lottery could use the [UN Sustainable Development Goals](#) and/or the [Sustainability Assessment Tool](#) used by local government, as a basis for the criteria for the selection of projects in order to ensure projects are truly sustainable in that broader context and have a positive impact in more than one sector. This could also prevent projects being funded that may have a positive impact on one sector but could also have negative implications or side effects in other sectors, e.g. a project that creates some economic benefit but pollutes an area or damages, reduces or eliminates a resource which benefits the wider population.

In general, there is a need for further work in sustainable development awareness and education, waste management, management and creation of habitat and green spaces, and natural and cultural heritage protection. It is probably best not to be prescriptive of particular categories within those

spheres to try to ensure that there are opportunities for the best projects to be determined, considering a multitude of factors. It is important that funds are given to projects with identifiable and high priority outputs; this could be assessed through criteria regarding delivery supportive of identified priority outputs in existing strategies such as the Sustainable Development Strategy, the Waste Management Strategy, the Forestry Strategy and/or the Biodiversity Strategy.

Partnerships

Partnerships are in general an excellent way of ensuring good projects and the scheme should promote partnership working and give credit in its decision-making for such efforts. Partnerships across borders (within Ireland or the UK) should be supported. However, partnership should not be a requirement for all projects.

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