

ESSEDRA Policy Advocacy 2014

Working document

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Part I Policy Advocacy

What is policy advocacy?

Advocacy is a set of targeted actions directed at decision makers in support of a specific policy issue.

Advocacy Networks are groups of organizations and individuals working together to achieve changes in policy, law, or programs for a particular issue.

The key characteristics of advocacy comprise:

- ✓ advocacy is always directed at influencing policy, laws, regulations, programs, or funding, in other words decisions made at the upper-most levels of public (or private) sector institutions;
- ✓ advocacy is also strategic and targets well-designed activities to key stakeholders and decision makers;
- ✓ advocacy is a process, occurring over certain period of time, sometimes brief and often lengthy.

Types of advocacy campaigns:

Advocacy includes both single-issue, time-limited campaigns and ongoing work undertaken by a network around a range of issues—conducted at the national, regional, or local levels.

Another way of looking at policy advocacy is the level at which the issue is addressed:

1) A high-level dialogue with policymakers and other influential leaders on broad policy issues and national policies –
eg. support for small scale farmers or even the right of NGOs and civil society organizations to participate in the decision making process.

or

2) Focus the policy advocacy at the operational level - such issues might deal with the formulation of specific resource allocation and delivery guidelines.
eg. providing investment support for meeting EU hygiene requirements in traditional dairies/madras or producing a set of good practices for implementation of the EU hygiene requirements

A network's advocacy issues depend upon local political realities and the opportunities for change that exist as well as the **specific interests of network members**.

Therefore, expressing the specific interests of ESSEDRA project partners throughout the project implementation is of particular importance for the future policy advocacy work.

Steps in the Advocacy Process

The steps discussed here represent a logical set of actions that need to be undertaken in almost any advocacy situation, irrespective of whether it is an ad-hoc policy problem that needs urgent action or a long-known issue that has not been addressed.

I. Define the Issue. Advocacy begins with an issue or problem that the network agrees to support in order to promote a policy change. The issue should be focused, clear, and widely supported by the project partners.

II. Set Goal and Objectives. A goal is a general statement of what the network hopes to achieve in the long term (three to five years).

The advocacy objective describes short-term, specific, measurable achievements that contribute to the advocacy goal.

III. Identify Target Audience. The primary target audience includes the decision makers who have the authority to bring about the desired policy change.

The secondary target audience includes persons who have access to and are able to influence the primary audience—other policymakers, fellow NGOs, the media, local leaders, etc.

The network must identify individuals in the target audience, their positions, and relative power base and then determine whether the various individuals support, oppose, or are neutral to the advocacy issue.

IV. Build Support. Building a constituency to support the network's advocacy issue is critical for success. The larger the support base, the greater are the chances of success. Network members must reach out to create alliances with other NGOs, networks, donors, coalitions, civic groups, professional associations, women's groups, activists, and individuals who support the issue and will work with you to achieve our advocacy goals.

How do you identify potential collaborators? Partners can attend conferences and seminars, enlist the support of the media, hold public meetings, review publications, and use the Internet.

V. Develop the Message. Advocacy messages are developed and tailored to specific target audiences in order to frame the issue and persuade the receiver to support the network's position.

There are three important questions to answer when preparing advocacy messages:

Who are you trying to reach with the message?

What do you want to achieve with the message?

What do you want the recipient of the message to do as a result of the message (the action you want taken)?

VI. Select Channels of Communication. Selection of the most appropriate medium for advocacy messages depends on the target audience. The choice of medium varies for reaching the general public, influencing decision makers, educating the media, generating support for the issue among like-minded organizations/ networks, etc.

Some of the more common channels of communication for advocacy initiatives include press kits and press releases, press conferences, fact sheets, a public debate, a conference for policymakers, etc.

VII. Raise Funds. Advocacy campaigns can always benefit from outside funds and other resources.

Advocacy networks should develop a fundraising strategy at the outset of the campaign to identify potential contributors of financial and other resources.

VIII. Develop Implementation Plan. The network should develop an implementation plan to guide its advocacy campaign. The plan should identify activities and tasks, responsible persons/committees, the desired time frame, and needed resources.

On-going Activities

Collect Data. Data collection supports many of the stages of the advocacy process shown in the model. Advocacy networks should collect and analyze data to identify and select their issue as well as develop advocacy objectives, craft messages, expand their base of support, and influence policymakers. Data collection is an ongoing activity for the duration of the advocacy campaign.

Monitor and Evaluate. As with data collection, monitoring and evaluation occur throughout the advocacy process.

Before undertaking the advocacy campaign, the network must determine how it will monitor its implementation plan. In addition, the group should decide how it will evaluate or measure progress and results:

Can the network realistically expect to bring about a change in policy, programs, or funding as a result of its efforts?

In specific terms, what will be different following the completion of the advocacy campaign?

How will the group know that the situation has changed?

Lessons learned on policy advocacy as shared by ESSEDRA project partners

The policy advocacy hints presented here are synthesized from the partner's presentations during the Advocacy Training and the discussions surrounding them:

- ☀ In advocacy campaigns it is important to use the same technical language – professional terms and terminology – as the target audience and supporting organizations
- ☀ Use a non-offensive attitude to people with opposing positions
- ☀ It is very useful to meet with all parties on the policy issue together where they can openly present their positions and discuss potential solutions addressing all concerns
- ☀ Work towards establishing trust between the parties – eg. farmers and administration, farmers and NGOs, NGOs and administration
- ☀ Present real sector success stories to feed in the discussion of solutions
- ☀ Concrete results and clear benefits are very important for involving farmers in the policy actions
- ☀ Raise awareness of farmers on the specific policy issues to make them knowledgeable allies
- ☀ Increase the involvement of civil society and also build their capacity to participate constructively in the policy dialogue including in the development and implementation of policies and legislation
- ☀ Networking between NGOs not least about sharing knowledge and information almost always is a win-win situation
- ☀ The importance of association is underlined, noting that informal association sometimes is better than formal
- ☀ At the same time, it is very important to have a strong leadership on the policy issue – at the end of the day, someone has to do the job
- ☀ When planning advocacy actions we need to allocate more time for participation in technical working groups, which is usually underestimated
- ☀ Social media, if well used, can be a very strong supporting tool
- ☀ It is necessary to raise the awareness of general public about the importance of small farmers so that they are not considered an old-fashioned group that inevitably will disappear
- ☀ Every person has a role to play ..

Part II ESSEDRA Policy Advocacy in 2014

At the end of ESSEDRA project year 1 our advocacy network¹ has agreed that the **focus of ESSEDRA network shall be on small scale cheese producers – milk farms and (traditional) dairies.**

The goal that seems to emerge is two-fold²:

- 1) **ESSEDRA advocacy network wants to ensure that small scale cheese producers – milk farms and (traditional) dairies are supported by national and IPARD funds, as well as**
- 2) **The hygiene rules and direct sales requirements adopted at national level make full use of the flexibility options, provided by EU regulations in order to respect the characteristics of small scale cheese producers – milk farms and (traditional) dairies .**

The two objectives are based on the findings³ of the policy questionnaires on the cheese products nominated for the Ark of Tastes in 2013 as well as on the discussions with ESSEDRA project partners. Respectively, the activities that were proposed and agreed are as follows:

Regional level policy advocacy action for 2014	Relevant to all countries in the project					
p.1. ESSEDRA regional position paper on new IPARD regulation and how countries should use it to address the issues of small scale cheese producers – milk farms and (traditional) dairies – leads EFNCP, partners contribute						
National level policy advocacy action for 2014 selected by:	AL	BiH	MK	SR	TR	HR
p.2. National ESSEDRA position papers on new IPARD regulation focusing on the specific national needs and opportunities for cheese producers (milk farms and dairies) including investments, processing and marketing on farms, diversification of farming activities, agri-environmental payments, Leader local development approach as well as provision of training and advisory services	Yes		Yes			

¹ A description of the process is presented in Annex 1

² *The narration of the goal is open for discussion and precision of wording!*

³ A full summary of the policy questionnaires about the cheese and local breed products nominated in the Ark of Tastes in 2013 is presented in Annex 2.

Macedonia is not in the list since there were no cheese products nominated in 2013. Romania has no State/EU financial support issues in the policy questionnaire, Bulgaria and Croatia have no Hygiene policy issue identified in the policy questionnaire.

p.3 ESSEDRA position paper on CSO involvement in the programming, implementation and monitoring of the new IPARD programmes at national level	Yes	Yes				
p.4 Analysis of hygiene rules and requirements for direct sales at national level for selected dairy products from HNV livestock systems	Yes	Yes	Yes	Yes	Yes	Yes*

*If there will be budget for this type of activities

Summary of the issues related to State/EU financial support as identified in the policy questionnaires on the cheese products nominated for the Ark of Tastes in 2013

Bosnia and Herzegovina

- Small producers do not have any kind of state support - sometimes they receive support from different international organizations through trainings, small grants, study visits, etc.

Serbia

- Unfavorable requirements for quarterly subsidy for small farmers. Only delivery from the first to the last day of the quarter is subsidized.
- Financial support at the local and state level is necessary to the cattle breeders and processors in the municipalities of Dimitrovgrad and Pirot in order to meet new requirements from the officials about the hygiene legislation and direct sales
- Lack of agriculture advisory service and animal registry service in the municipality of Dimitrovgrad
- Government decrees on subsidies are often in collision with reality in the field. For example: they provide a subsidy for cows registered in the municipal register of animals but there is no such service in the municipality of Dimitrovgrad for last 30 years

Turkey

- State support for small scale livestock breeders and dairy producers is very low.
- IPARD funds are distributed to the big dairy companies who have good relationships with the ministry.
- Small farmers can't apply for IPARD funds because they lack the knowledge and they can't meet minimum requirements for applying.
- Most of the farmers are afraid to apply hence they believe that they can't afford the extra investment costs and bureaucratic rules.

Croatia

- Most of the Busha breeders are subsidised by the National Cattle Breeding Programme that started in 2007. This system actually did help to increase the number of animals, from 36 in 2002 to 500 now but sustainable development of the breed or its products is not directed at all.
- The amount of administration and paperwork necessary for obtaining the state land/pastures, means of subsidising for indigenous breeds, placing products on the market etc is enormous.

Bulgaria

- A national policy for small-scale farmers and artisan food producers is needed.
- Rural infrastructure (including social infrastructure -lack of schools, medical care, bad infrastructure,) needs to be improved by a set of adequate measures.

Summary of the issues related to Hygiene rules and direct sales as identified in the policy questionnaires on the cheese products nominated for the Ark of Tastes in 2013

- Bosnia and Herzegovina**
- There is a large number of producers which are not registered because they do not respect certain conditions
 - The use of unpasteurized milk for dairy products is not legally recognized and such products cannot be sold on the market

- Serbia**
- Missing or changed standards for using of raw milk
 - The producers sell cheese outside the official market places - shops and green markets
 - Food safety standards are too high to be met by small farmers, that are producing in small quantities - no interest in investments for meeting these standards

- Turkey**
- Hygiene rules and procedures enforced due to EU accession period are difficult to be met by small farmers and producers
 - Consumers have negative bias against non- industrial dairy products due to hygiene concerns.
 - Animal welfare is a big problem. They tend to save the day and don't care about sustainability much

- Romania**
- Bureaucracy in obtaining permissions for a production unit, certification for production of a traditional product, sanitary and veterinary requirements, etc. - especially for a small enterprise will remove the focus from the production to the paperwork .
 - Hygiene Requirements – Flexibility is not understood;
 - Lack of consistency for the rules – although derogations for small farmers do exist in some of the cases, they are not applied in practice by the inspectors

Review of IPARD 2014-2020 policy process and its importance to ESSEDRA network

The EU supports reforms in the 'enlargement countries' with financial and technical help via the Instrument for Pre-accession Assistance⁴ (IPA). Through IPA, the EU reinforces its guidance to the aspiring countries on the priorities necessary for aligning with EU standards and legislation.

Therefore, it is very important that the ESSEDRA project tries to influence the design of the new 2014-2020 IPA for Rural Development measures in a way that is favourable for small cheese producers – milk farms and (traditional) dairies in order to address at least some of the issues identified in the field research and policy questionnaires.

The implementation of the new IPA Regulation is expected to bring simplification and more flexible procedures compared to the previous programming period which are reported by all partners as problematic.

IPA support in the area of rural development (IPARD II) is to be implemented again through rural development programmes. These programmes shall implement strategic priorities for rural development set out in Country Strategy Paper, through a pre-defined set of measures.

The indicative timeline of the policy process is that the IPA Regulation and the Programming Framework shall be ready by the end of March 2014. After that the countries have 4 months to present the IPA Country Strategy Paper.

This provides an opportunity for ESSEDRA project to present its positions to policy makers during the Terra Madre Balkans in June 2014. In order to make the best use out of the TMB 2014 for advocating the needs of small scale cheese producers – milk farmers and (traditional) dairies, ESSEDRA project partners will have to do preparatory and follow up work at national level as presented in the next section of the document.

Indicative timeframe of the official IPA programming process

Policy document	2013	2014			
	Q4	Q1	Q2	Q3	Q4
IPA Regulation					
Rules of Application					
Strategic IPA Programming Framework					
Country Strategy Papers					
Framework agreements					
2014 Programmes					

⁴ http://ec.europa.eu/enlargement/instruments/overview/index_en.htm

Part III Involvement of ESSEDRA project partners in the advocacy work

AT REGIONAL LEVEL

Partnership is the basic principle of current and future EU-Rural Development Policy. Rural development and IPARD assistance shall be implemented through close consultation between EU-Commission and Member State / (potential) Candidate Country on the one hand. On the other hand there should be also established close consultation inside the country between most representative partners/stakeholders. Involvement of appropriate partners at various programming and implementation stages follows the EU Partnership Principles.

Therefore, EFNCP proposed and it was agreed that we develop **ESSEDRA regional position paper on new IPARD regulation and how countries should use it to address the issues of small scale cheese producers – milk farms and (traditional) dairies**, which should be used as a framework for the advocacy discussions at regional level but also national levels about the needs and opportunities for cheese producers and other small scale farmers.

It should also be a helpful instrument in the discussions with government officials and other stakeholders about the organization of Terra Madre Balkans 2014.

What does it mean for partners?

1. In order to make it meaningful to all countries in the project it will be vital that all partners spend time to discuss and comment on the draft version (that we will produce) before it is finalized.
2. After it is finalized by us, integrating all relevant comments and proposals, ESSEDRA partners are free to use it in their project activities, including in preparation for TMB 2014):
 - Communicate it to the Ministry of Agriculture and/or the European Delegation by organizing meetings with them or sending letters;
 - Organize meetings with the ESSEDRA associate partners and other NGOs at national level to communicate it to them and see if they can develop joint activities
 - Communicate it to the media
 - Present it during various events in which they participate
 - Others, as you may find relevant
3. The ESSEDRA regional policy position will be understandably produced in English, therefore the partners will need to translate it to the national languages.

Speaking in terms of time-frame:

EFNCP will produce the draft position by the end of February with the aim to have a final version by the end of March, when the IPA Regulation and Programming Framework shall be ready, which will open up the door for national level activities.

AT NATIONAL LEVEL

There are two main advocacy activities to be focused at the national IPARD level:

- 1) National ESSEDRA position papers on new IPARD regulation focusing on the specific national needs and opportunities for dairy products from HNV livestock systems including investments, processing and marketing on farms, diversification of farming activities, agri-environmental payments, Leader local development approach as well as provision of training and advisory services – partners lead, EFNCP contribute
- 2) ESSEDRA position paper on CSO involvement in the programming, implementation and monitoring of the new IPARD programmes at national level - partners lead, EFNCP contribute

What does it mean for partners?

1) As regards the practical implementation of the national ESSEDRA position papers on new IPARD regulation focusing on the specific national needs and opportunities, ESSEDRA project partners can be involved in:

I. Preparation of Programme

- a. Participating in technical working groups for measure design and/or
- b. Taking part in consultation, negotiation process on different stages (strategy and prioritisation process) of planning process, public hearings

II. Implementation of Programme

- c. Monitoring, Evaluation by being member of Monitoring Committee or Evaluation Steering Group
- d. Active dissemination of information to rural people/farmers on programme funding opportunities.

At the moment, this is really a menu of options where the partners that have chosen to work on the action –VIS Albania and Slow Food Bitola, can consider which one or which combination to implement. We will try to present the ups and downs of each activity here:

1a. Participating in technical working groups for measure design

Pro

- + You will be able to have first hand information and influence the texts that will be written on the measures
- + You will get to know the people working on this both from the public bodies and the NGO sector and the motives about their positions and how, when and why they are willing to change them

Cons

- It is very time consuming and efforts demanding in what can turn out to be a pre-decided situation
- The access to the technical working group may not be open and you may end up spending your time to 'open the door' rather than working on the issues of interest

Ib. Taking part in consultation, negotiation process on different stages (strategy and prioritisation process) of planning process, public hearings

Pro

- + Still provides opportunities to present and justify our positions and requirements for IPARD in the country
- + Less time and effort demanding because it is unlikely that there will be more than one or two public meetings

Cons

- Potentially it is less targeted for the specific needs of cheese producers as the public consultation normally will be carried out when the entire strategy and/or programme and/or measures are ready

IIa. Monitoring, Evaluation by being member of Monitoring Committee or Evaluation Steering Group

Pro

- + This is a long term involvement with IPARD because the Monitoring Committees have to meet at least twice during each year of the implementation by 2020.
- + Positions the national partner among the organizations which can still improve, amend or adapt the national IPARD programme during the process of its implementation
- + It is not very demanding in terms of time and efforts comparing the two meetings per year and the potential impact on IPARD programme
- + **WE WOULD RECOMMEND TO ALL ESSEDRA NATIONAL PARTNERS WHO WISH TO BE INVOLVED IN THE POLICY PROCESS IN THE LONG TERM TO TRY TO BECOME MEMBERS OF THEIR NATIONAL IPARD MONITORING COMMITTEES**

Cons

- Requires certain level of knowledge of the IPARD programme and European Agriculture and Rural Development Regulation specifically about the partnership principle (as well as on the needs of cheese producers and other small farmers whose interests will be represented!)

IIb. Active dissemination of information to rural people/farmers on programme funding opportunities.

Pro

- + In practice this activity can begin towards the end of 2014, most likely in 2015
- + Fills in an important gap in the information provision to cheese producers and small farmers especially in remote rural areas

Cons

- If it is not implemented jointly with at least one of the above activities, it will mean that you will be distributing information that you had not influenced sufficiently

2) ESSEDRA position paper on CSO involvement in the programming, implementation and monitoring of the new IPARD programmes at national level - partners lead, EFNCP contribute

We understand that many of you think that this activity is too vague and unclear and that work on IPARD may be not so useful for farmers on the ground. There is enough evidence to justify that thinking and we recognize that from farmers' perspective this is a valid position.

However, our stubbornness (as some of you may call it ☺) to insist on it is based on our experience as NGOs working on the topic in former EU accession countries – Bulgaria, Romania, Slovakia, etc.

The EU requirement to establish Monitoring Committees for the Rural Development Programmes at national level with broad participation of socio-economic and environmental stakeholders is an opportunity not to be missed; because it allows NGOs, even small ones, to participate in policy formulation and policy making. This is very important in our countries where the tradition of policy making is not one of open public participation.

You have to bear in mind that there is no such strict requirement for EU Hygiene policy. The successes of the Romanian and Bulgarian NGOs to influence the implementation of the EU Hygiene regulations were mostly possible because these NGOs (or their partners in the case of SF Bulgaria) were and are still members of the RDP Monitoring Committees. As weak as it may seem from aside this should not be underestimated!

This is the reason why we proposed the above listed activity and would like to stress again that we recommend to all national partners to consider becoming members of the Monitoring Committees of their RDPs.

What does it mean for partners?

1. EFNCP will develop a special position paper on CSO involvement in the monitoring in IPARD on the basis of EU regulations and NGO practice and experience
2. National partners spend time to contribute and comment on the draft position so that it fully reflects the realities and needs of the region
3. EFNCP will organize a training for the partners interested in becoming members of their national RDP Monitoring Committees
4. National partners will submit the position and request to join the national RDP Monitoring Committees to the respective Ministry of Agriculture with copy to the EU Delegation.
5. EFNCP will provide ongoing support to the interested partners on the topic.

Speaking in terms of time-frame:

The draft version of the position will be developed by the end of April with the aim to finalize it by the end of May.

The position should be launched during TMB 2014 with the training and national activities implemented during the second half of 2014.

3) Analysis of hygiene rules and requirements for direct sales at national level for cheese producers – milk farmers and (traditional) dairies

This activity has been chosen by all national partners to implement it in 2014, including Kinookus from Croatia (if budget will be made available to them).

During the Advocacy Training we discussed that given the specific experience of Adept and SF Bulgaria to address the issue at national level as well as to recognize the role of these two countries as EU member-states in the project – it will be recommended that they lead this activity.

After the training, Ben has sent his proposal to partners that Adept can share its experience on Hygiene rules and flexibility (as well as on agri-environment, training for farmers and promoting local and traditional products):

- ADEPT worked closely with the Sanitary Authority in **order to define the minimum hygiene rules for small producers.**
- ADEPT) also held **hygiene trainings and organized a pilot food barn for making the products under the minimum food hygiene requirements.**

This week, Dessi sent the proposal from SF Bulgaria for the work on Hygiene to “focus mostly on hygiene rules per country, and try with the help of SFI and the Forum to prepare a position paper calling for adequate flexibility measures at DG Sanco and parallel to it lobby at national level for the application of such measures”.

What does it mean for partners?

By the look of it, there is again a menu of activities that are possible and that partners will have to decide which one is relevant for them and they are willing to implement:

1. Work towards defining minimum hygiene rules for small cheese producers at national level – which in practice means make good use of the current allowance of the flexibility measures of the EU Regulation.
2. Organize training on minimum hygiene rules for small cheese producers for the responsible administration and/or for the producers and/or for the advisors
3. Develop a position paper requesting national authorities to make full use of the flexibility arrangements for small cheese producers.

Speaking in terms of time-frame:

We have the timeframe as suggested by Dessi for activity 3, the position paper – which we agree with.

The timeframe for activities 1 and 2 will depend on partners interest in doing them as well as on Adept’s availability in the year.

Annex 1 Policy Advocacy Actions in 2013/ Year 1 in ESSEDRA project

The Advocacy Training was organized almost at the end of the first year of the ESSEDRA project. This was preceded by a desk research of national agriculture and rural development policies with a focus on small farmers.

As a result of the background analysis and partner's recommendations for policy needs and actions at national level, **in May 2013 EFNCP produced a proposal that ESSEDRA Joint Advocacy Strategy focused on the following policy issues surrounding HNV livestock farmers and the associated traditional and artisan food products:**

- 1) Rural development support from the next round of IPARD financial assistances addresses adequately the investment, training and advisory as well as association and cooperation needs of HNV livestock farms and farmers.
- 2) The food safety and hygiene requirements for dairy producers from HNV livestock systems is making a full use of the flexibility option and is enabling direct sales of quality cheeses, kashkaval and other dairy products as identified in the ESSEDRA traditional food mapping exercise.
- 3) The harmonisation of the food quality policy enables and promotes the marketing of quality cheeses, kashkaval and other dairy products as identified in the ESSEDRA traditional food mapping exercise.
- 4) The registration process and procedures for HNV livestock farms and farmers is farmer-friendly and does not create unnecessary administrative and economic burden for farmers.
- 5) HNV livestock farmers have regular access to quality, targeted and timely training and ongoing advice on the wide spectrum of farm business issues related to their farming system.

Additionally, during the preparation of the Inception report, EFNCP was also asked to produce a proposal for specific policy actions which we submitted to Slow Food prior to the Inception Conference on 16th May 2013. It comprised 10 points which were presented and discussed in Belgrade but no agreement was reached:

- 1.** All partners review our proposal that ESSEDRA Joint Advocacy Strategy focuses on the policy issues surrounding HNV livestock farmers and the associated traditional and artisan food products (the 5 bullets above)
- 2.** Agreement is reached in the partnership as to which policy aspects are addressed in which country and in what level of details (from the 5 bullets above), depending on status in EU accession process (during the Inception meeting in Belgrade)
- 3.** Agreement is also reached in the partnership as to which policy aspects are addressed in regional position papers (during the Inception meeting in Belgrade)
- 4.** Training on policy advocacy is carried out for project partners (autumn 2013)
- 5.** (Proposed) ESSEDRA regional position paper on new IPARD regulation and how countries should use it to address the issues of HNV livestock farmers and the associated traditional and artisan products, including provision of training and advisory services – leads EFNCP, partners contribute

6. (Proposed) National ESSEDRA position papers in the countries focusing on the specific national needs and opportunities – partners lead, EFNCP contribute
7. (Proposed) ESSEDRA regional position paper on CSO involvement in the programming of the new IPARD programmes at national level – partners then can adapt it at national level – EFNCP leads, partners contribute
8. (Proposed) Analysis of Hygiene rules and requirements for direct sales at national level for selected products from HNV livestock systems (identified in the mapping exercise) – national lead
9. (Proposed) Review and identification of good practices for of Hygiene rules and requirements for direct sales at national level for selected products from HNV livestock systems from Slow food experience in other EU countries
10. (Proposed) Analysis and position on farmer/land registration requirements – at national level

Again, during the Inception conference in Belgrade EFNCP was asked to propose additional policy questions that will accompany the food mapping questionnaire. This again opened the scope of the potential analysis to all products since no agreement was reached on the proposal for focusing the advocacy actions to HNV livestock farmers and the associated traditional and artisan food products (cheeses, kashkaval and other dairy products).

In agreement with the discussions in Belgrade EFNCP produced a questionnaire to accompany the food mapping template in order to understand better the farm-specific issues about each food product identified in relation to the 5 focus points for policy actions we had proposed:

Q1: What is the size of the farm in which the food product/raw material is produced?

- We are interested not only in the land that is owned by the farmer but also land that is used under informal or semi-formal arrangements with neighbours; common /municipal or state/ land for grazing etc.
- Size also relates to number of livestock

Q2: Farm/farmer registration

- Is the farm, the farmer and the farm animals registered according to the national requirements or this is not necessary?

Q3: Policy support to the farm/farmer

- We are interested to know if the farmer is applying for any type of state/EU agricultural or rural development support
- If YES, what type of support is it? How easy is it to receive it? How does it relate to the food products that are of interest for the mapping exercise?
- If NO, what are the reasons? No support for this type of farms, no information on it, not eligible to receive it, not interested, etc.

Q4: Nature values of the farm/location in protected areas

- We are interested to know if the farm or the farming system from which the products of interest for the mapping exercise can be considered of High Nature Value? I.e. is it based solely, or mainly, on semi-natural pastures or traditional orchards? Is this recognized as strength by the farmers themselves?
- Also, is the farm land located in a national protected area or potential Natura 2000 sites?

Q5: Training needs of farmers

- What are his/her advice/training and/or consultancy needs? What kind of 'capacity' do they lack?

It was agreed that the responses to the policy questions from project partners will be available by end of September which would be provided for at least one month for the analysis of the expected +70 responses. In reality, by the end of September we have received only input from Turkey. Most of the responses (five countries) were received throughout October. Input from one country was received two days before the training. Input from one country was not received.

In practice, this meant that we could not focus the policy examples of the training on the second day on one or several policy issues so as to make it more useful. It had the same general spread that we had in the project so far. As it became obvious we could not go on like this.

Finally, during the Advocacy training it was agreed that ESSEDRA project shall focus its policy advocacy on cheese producers.

At the end of 2013 we collected the individual preferences of the partners for the 2014 Advocacy activities:

Regional level – 1.ESSEDRA regional position paper on new IPARD regulation and how countries should use it to address the issues of HNV livestock farmers and the associated traditional and artisan products – leads EFNCP, partners contribute

National level:

- 2.** National ESSEDRA position papers on new IPARD regulation focusing on the specific national needs and opportunities for dairy products from HNV livestock systems including investments, processing and marketing on farms, diversification of farming activities, agri-environmental payments, Leader local development approach as well as provision of training and advisory services – partners lead, EFNCP contribute
- 3.** ESSEDRA position paper on CSO involvement in the programming, implementation and monitoring of the new IPARD programmes at national level - partners lead, EFNCP contribute
- 4.** Analysis of hygiene rules and requirements for direct sales at national level for selected dairy products from HNV livestock systems (identified in the mapping exercise) – national lead, Adept supports.

Annex 2 Policy issues related to nominated cheese products and local breeds

Co	Dairy products and local breeds nominated	Farmers profile/ Farming system	Policy issues identified
Non EU member states			
AL	<ul style="list-style-type: none"> Mishavinë (typical cheese spread) Maza e capres (cream cheese) Jardun Kjumsht (drink) 	<ul style="list-style-type: none"> Reduction of number of animals Migration from the region Replacement of lamb or kid skin with plastic containers for economic purposes Kjumsht is seen as a dairy product linked with the past and the restriction due to poverty 	<ul style="list-style-type: none"> No policy questionnaire was submitted
BiH	<ul style="list-style-type: none"> <i>Kajmak</i> Livno cheese Pramenka sheep Cheese in the sheepskin sack Vlašić cheese 	<ul style="list-style-type: none"> Small producers, some of which that are not registered they do not respect certain conditions Traditional way of grazing the sheep (Pramenka) – summer grazing in alpine mountain grasslands – size of herds: 5-150 heads Traditional way of preparation of dairy products : some are made of unpasteurized milk (kajmak, Vlašić cheese), the taste depends on how long the product matures on the pasture (kajmak); some depend on high quality of mountain grasslands and Pramenka (autochthonous sheep breed) milk; produce are for subsistence needs or sold directly (not legally) to regular customers 	<p>Hygiene and food safety rules</p> <ul style="list-style-type: none"> There is a large number of producers which are not registered because they do not respect certain conditions The use of unpasteurized milk for dairy products is not legally recognized and such products cannot be sold on the market <p>State/EU financial support</p> <ul style="list-style-type: none"> Small producers doesn't have any kind of state support - sometimes they receive support from different international organizations through trainings, small grants, study visits, etc. <p>Cooperation between farmers</p> <ul style="list-style-type: none"> There is a big number of associations, but no associations of a certain product. The associations does not cooperate with each other

			<p>Training and research</p> <ul style="list-style-type: none"> • Training in hygiene aspects of the production, sales and marketing skills, how to find funds and how to prepare a projects, how to lobby government, promotion of products, how to combine farm products and tourism.
MK	No dairy product or breed were nominated	No dairy product or breed were nominated	<p>No dairy product or breed were nominated</p> <p>Training and research</p> <ul style="list-style-type: none"> • Training about the use of IPARD funds • sustainable agricultural techniques • Preserving the ecological principles in farming
SR	<ul style="list-style-type: none"> • Busha cattle • Cooked cheese • Pirot mixed hard yellow cheese kachkaval • Pirot zackel sheep • Urda (whey cheese) Vlashko Vitoroga Zackel sheep • Vurda (strained curd milk) 	<ul style="list-style-type: none"> • Over 50 years old • Small farmers – 0,5 – 20 ha depending on the activity • Significantly use rented arable land, pastures and meadows. • Mixed farm structure and most of them also have on farm processing: milk, meat, cheese, juices, jams, wine etc. • A small number of farms are engaged in rural tourism • Almost 60-90% of the products are sold 	<p>Socio-economic issues</p> <ul style="list-style-type: none"> • Low product prices, • Unfavorable credit requirements • Lack of mechanization and land; • Delayed payment of already sold products <p>Hygiene and food safety rules</p> <ul style="list-style-type: none"> • Missing or changed standards for using of raw milk • The producers sell cheese outside the official market places - shops and green markets • Food safety standards are too high to be met by small farmers, that are producing in small quantities - no interest in investments for meeting these standards <p>State/EU financial support</p> <ul style="list-style-type: none"> • Unfavorable requirements for quarterly subsidy for small farmers - they are directly ruined through the concept of giving quarterly subsidy for milk. Only delivery from the first to the last day of the quarter is subsidized. • Financial support at the local and state level, in order to meet new requirements from the officials about the hygiene legislation and direct sales, is necessary to the cattle breeders and processors in the

			<p>municipalities of Dimitrovgrad and Piroto</p> <ul style="list-style-type: none"> • Lack of agriculture advisory service and animal registry service in the municipality of Dimitrovgrad • Government decrees on subsidies are often in collision with reality in the field. For example: they provide a subsidy for cows registered in the municipal register of animals but there is no such service in the municipality of Dimitrovgrad for last 30 years <p>Training and research</p> <ul style="list-style-type: none"> • Interested in HACCP, PDO, PGI certification in agriculture • Professional trainings and education: Project Cycle Management – mentoring work with trainers, Communication, presentation, negotiation and lobbying skills ,Foreign language courses in English
TR	<ul style="list-style-type: none"> • Yanik Yogurt (Burnt Yogurt) • Divle Obruk Peyniri (Divle Cave cheese) • Izmir (teneke) tulumu (Izmir Tulum cheese pressed in tin can) • Kargı Tulum Peyniri (Kargı Tulum cheese) • Kars Eski Kaşar Peyniri (Aged Kars Kasar Cheese) • Kars Gravyeri (Kars Gruyere hard cheese) • Mihaliç Peyniri or Kelle (means head) Peyniri (Mihaliç or Kelle cheese) 	<ul style="list-style-type: none"> • Most of the farmers and farm animals registered according to the national requirements and it is necessary. • Family businesses • Low animal welfare • Pasture breeding • No organization among producers • Most of the production takes place at homes and they don't have a production licence due to food hygiene rules • In Denizli there are national protected areas such as Pamukkale and Işıklı Bird Lake and Kartal Lake. The area is rich in terms of natural reserve areas 	<p>Socio-economic issues</p> <ul style="list-style-type: none"> • Low milk prices • Small scale producers and dairy livestock breeders live at hard economic conditions • There is no generational renewal, young people live the villages and move to big cities • Some dairy firms sell products with the same name even though they do not use traditional methods or local milk and age the cheeses in cold storage rooms. • Pasture breeding has decreasing, because it is costly and requires more work. • Mechanization and emphasizing economies of scale are main threats to the traditional production. <p>Hygiene and food safety rules</p> <ul style="list-style-type: none"> • Hygiene rules and procedures enforced due to EU accession period are difficult to be met by small farmers and producers • Consumers have negative bias against non- industrial dairy products due to hygiene concerns.

<ul style="list-style-type: none"> • Sakız Koyunu (Sakız sheep) • İslî Çerkez Peyniri (Smoked Circassian Cheese) • Türkmen Saçak Peyniri (Turkmen Fringe (Saçak in Turkish) cheese) • Van Otlı Peyniri (Van Herbed Cheese) 		<ul style="list-style-type: none"> • Animal welfare is a big problem. They tend to save the day and don't care about sustainability much <p>State/EU financial support</p> <ul style="list-style-type: none"> • State support for small scale livestock breeders and dairy producers is very low. • Farmer can apply for state rural development support but the support is very low. • IPARD funds are distributed to the big dairy companies who have good relationships with the ministry. • Small farmers can't apply for IPARD funds because they lack the knowledge and they can't meet minimum requirements for applying. Most of the farmers are afraid to apply hence they believe that they can't afford the extra investment costs and bureaucratic rules. <p>Cooperation between farmers</p> <ul style="list-style-type: none"> • Individualism, no cooperative or union culture • There is no official association or union of producers because no one has a hope that things can be changed in favour of them. <p>Training and research</p> <ul style="list-style-type: none"> • Farmers need to be trained about the necessity to unite and fight for their rights under the roof of a official structure such as a union or a cooperative. • Info and knowledge about available support funds, animal welfare and sustainable farming.
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EU member states

Co	Dairy products and local breeds nominated	Farmers profile/ Farming system	Policy issues identified
HR	<ul style="list-style-type: none"> • Škripavac (cheese) • Busha indigenous breed 	<ul style="list-style-type: none"> • Registered farm with 39 Busha cows, 70 donkeys, 10 horses • Grazing is done in Natura 2000 area and national park on 700 ha; Land owned – 1 ha • The cheese is produced for the needs of the local population in the village 	<p>State/EU financial support</p> <ul style="list-style-type: none"> • Most of the Busha breeders are subsidised by the National Cattle Breeding Programme that started in 2007. This system actually did help to increase the number of animals, from 36 in 2002 to 500 now but sustainable development of the breed or its products is not directed at all. • The amount of administration and paperwork necessary for obtaining the state land/pastures, means of subsidising for indigenous breeds, placing products on the market etc is enormous. <p>Cooperation between farmers</p> <ul style="list-style-type: none"> • Most of the Busha breeders in Croatia are a part of Association of Busha breeders (2005) but the cooperation is limited to cattle exchange. <p>Training and research</p> <ul style="list-style-type: none"> • Training/demonstrational centre for Busha breeding. • Information and know-how necessary to start breeding and/or producing. • Paperwork necessary for obtaining the state land/pastures, means of subsidising for indigenous breeds, placing products on the market etc

BG	<ul style="list-style-type: none"> No dairy products RODOPI SHORTHORN CATTLE 	<ul style="list-style-type: none"> Extensive herding, majority of animals graze in the open air on dry grasses and bushes. Feeding with forage (hay) is needed only at longer cold periods. This semi-wild life stimulates natural immunity and additional antibiotics and vaccination (except obligatory ones) are not needed. Farmers (except the breeders of the local breeds) are usually not registered as farmers in the legal meaning of this word. The breeders of local breeds are registered because thus they can receive subsidies 	<p>Socio-economic issues</p> <ul style="list-style-type: none"> Farming is still not considered as a family business by a significant part of the peasants but rather it is a subsistence occupation. <p>State/EU financial support</p> <ul style="list-style-type: none"> A national policy for small-scale farmers and artisan food producers is needed. Rural infrastructure (including social infrastructure -lack of schools, medical care, bad infrastructure,) needs to be improved by a set of adequate measures. <p>Training and research</p> <ul style="list-style-type: none"> Training for not-registered farmers. - a high number of young people who help their parents but who does not see their own future as farmers. Training for registered small-scale farmers. The first topic is why to continue to be a farmer? And then why cooperating is not dangerous? What can be the profit of each farmer if he/she is member of a cooperative or farmers association. Research of consumers needs would help also for the training of the farmers how to reach markets and consumers
RO	<ul style="list-style-type: none"> Brined Cheese / Brânză în Saramură Caşul de Năsal (Nasal cheese) Sura de stepă (cow) 	<ul style="list-style-type: none"> Traditional shepherding Local cow breed (Sura de stepă cow) was replaced by more productive breeds Traditional methods of producing the cheese using a natural rennet – the lamb stomach rennet (Brined Cheese / Brânză în Saramură) - The lack of or the uneven distributed slaughter houses for lambs in the area is a limitation for having this product on the market, as before the shepherds were allowed to slaughter the lambs at the sheepfold. Traditional way of production in cave (Caşul de Năsal (Nasal cheese) – with the closing of the cave the 	<p>Socio-economic issues</p> <ul style="list-style-type: none"> Lack of protection against the products counterfitting - Is not that the small producers are fighting the tough competition of cheap products, when is an increased demand of traditional, it's very easy for other entrepreneurs to pretend they are selling the same kind of produces Lack of initiatives to transit from domestic production to consumer's production. No market value of the local products Reluctancy for diversifications of products The rural communities are not business oriented.

		<p>production ceased</p>	<ul style="list-style-type: none"> • Shepherd profession is a tough one and therefore not attractive for the youngsters <p>Hygiene and food safety rules</p> <ul style="list-style-type: none"> • Bureaucracy in obtaining permissions for a production unit, certification for production of a traditional product, sanitary and veterinary requirements, etc. - especially for a small enterprise will remove the focus from the production to the paperwork t. • Hygiene Requirements – Flexibility is not understood ; Lack of consistency for the rules – although derogations for small farmers do exist in some of the cases, they are not applied in practice by the inspectors <p>Cooperation between farmers</p> <ul style="list-style-type: none"> • People are reluctant to form associations.
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Annex 3 Review of IPARD measures 2014-2020 of relevance for ESSEDRA project

The EU supports reforms in the 'enlargement countries' with financial and technical help via the Instrument for Pre-accession Assistance⁵ (IPA). Through IPA, the EU reinforces its guidance to the aspiring countries on the priorities necessary for aligning with EU standards and legislation.

Therefore, it is very important that the ESSEDRA project tries to influence the design of the new 2014-2020 IPA for Rural Development measures in a way that is favourable for small cheese producers – milk farms and (traditional) dairies.

The implementation of the new IPA Regulation is expected to bring simplification and more flexible procedures compared to the previous programming period. There is also a revision of the Financial Regulation, in particular the special provision for external actions, which is expected to help facilitate the participation of civil society organisations (CSOs) and small businesses in funding programmes - rules will be simplified, reducing the costs of participation and accelerating award procedures. Most of these provisions will be set out in the implementing acts for which the EC has to ensure that appropriate consultations are carried out during their preparatory work, including at expert level.

IPA support in the area of rural development (IPARD II) is to be implemented again through rural development programmes. These programmes shall implement strategic priorities for rural development set out in Country Strategy Paper, through a pre-defined set of measures.

A draft programming guide for IPA rural development programmes 2014-2020 was prepared by EC. The main measures of relevance to the Ark of taste products nominated by ESSEDRA project partners are presented further below.

The full list of IPARD II consists of the following measures:

- Investments in physical assets of agricultural holdings,
- Support for the setting-up of producer groups,
- Investments in physical assets concerning processing and marketing of agriculture and fishery products,
- Agri-environmental-climate and organic farming measure,
- Establishment and protection of forests,
- Investments in rural public infrastructure,
- Farm diversification and business development,
- Preparation and implementation of Local Development Strategies - Leader Approach,
- Improvement of training,
- Technical assistance,
- Advisory services.
- Support aid

Among them, there are two new measures: Establishment and protection of forest and Advisory services. The remaining measures existed in IPARD I, but most of them were not implemented by the candidate and potential candidate countries. The main measures that were implemented in the period 2007-2013 (either by IPARD or national/donor funds) were:

- Investments in physical assets of agricultural holdings
- Investments in physical assets concerning processing and marketing of agriculture and fishery products,
- Technical assistance

⁵ http://ec.europa.eu/enlargement/instruments/overview/index_en.htm

The public expenditure in IPARD II in principle will be limited to 50% of the total eligible cost of the investment, with the following exceptions:

- 60% for investment in physical assets of agricultural holdings.
- 65% for investments in physical assets of agricultural holdings made by young farmers, in farm diversification and business development.
- 70% for investments in physical assets of agricultural holdings in mountain areas.
- 100% for investments in/support for: rural infrastructure not generating substantial net revenue; activities financed under the Technical Assistance measure; establishment and protection of forests; preparation and implementation of Local Development Strategies - Leader Approach; setting-up of producer groups; agri-environment-climate and organic farming measure; improvement of training; advisory services.

Some of the important issues where ESSEDRA project partners can focus their advocacy efforts on :

Measure Investments in Physical Assets of Agricultural Holdings

- **National minimum standards** - the **whole holding** should comply with the national minimum standards in force regarding environmental protection and animal welfare by the end of the investment - in duly justified cases, derogation from this rule may be granted by the Commission. This must be clearly written in the IPARD Programme.
- **EU standards** - The **investment** when concluded must respect the relevant EU standards as regards environmental protection and animal welfare.
- **Business plan** - In **case of smaller investments** to be defined in the programme, a **simplified form of a business plan** can be accepted.
- Maximum and minimum size of farms and costs of investments – to be decided at national level
- Having in mind that the majority of the nominated Ark of Taste products are produced in mountain areas, it is important to encourage countries to designate their mountainous areas in order to make full use of the 70% co-financing rate for investments.

Measure Investments in physical assets in processing and marketing of agricultural and fishery products

- Not later than at the end of the project (before a final payment), the **entire enterprise** must comply with the **main relevant national minimum standards** in force regarding **environmental protection, public health, animal welfare, and occupational safety**.
- If the national standards based on EU standards are particularly demanding, and only in duly justified cases, **derogation from this rule may be granted by the Commission**. This must be **clearly written in the IPARD Programme**.

Measure Agri-environment- climate measure

- Measure at **pilot level**, targeted on limited number of areas, geographically well- defined with identified environmental objectives,
- Beneficiaries could be **farmers** or **group of farmers**
- **Eligible land** – **not only Utilised agricultural area (UAA)** - it could include "**potential**" **agricultural land** such as abandoned land. This flexibility makes it possible to implement the type of operation on land which is valuable for the environment .

- **Minimum 5 years** voluntary commitments
- **Relevant knowledge** - the country should ensure that each beneficiary before undertaking any type of operation(s) will possess relevant knowledge necessary to the successful implementation such type of operation
- **Baseline** – Agri-environment – climate support covers only the voluntary commitments going beyond the reference level (baseline) . Baseline has as objective to ensure that the level of AEC commitments goes sufficiently high and the premiums are not paid for what is required by law
- Payments should cover all or part of additional costs and income forgone arising from the implementation of the activity by a beneficiary comparing to the baseline practices reflecting agricultural conditions and the normal agricultural production methods as far as possible according to the site.
- In justified cases, the **transaction costs might be allowed**. The methodology must include information regarding the type of those costs, **their value as well as payment methods** (e.g. as **one-off payment or as part of each annual payment**). (Examples include: **information collection** and **knowledge acquisition** necessary for the efficient implementation of the type of operation; preparation of specific plans of activities for such implementation; **fees related to registration/permits** etc.)

Measure Implementation of local development strategies - LEADER approach

- LEADER under IPARD should be as similar as possible to the one implemented in Member States;
- Selection of LAGs – territories with sufficient coherence and critical mass, namely 5 000 – 150 000 inhabitants, including settlements with a population of less than 25 000. A LAG shall be an officially registered legal entity
- Measures:
 - Technical Assistance – for potential LAGs; Acquisition of skills, Animating the inhabitants of rural territories; Implementation of local development strategies; Cooperation projects
 - Relevant IPARD measures for realization of local projects under LDSs

Measure Farm diversification and business development

- Final beneficiaries are **farmers and any other private legal entities operating in rural areas responsible for undertaking the operation** (micro and small-sized enterprises, including **craft enterprises**, which have the potential for carrying out the project as well as any type of **legal person established by rural population in rural areas**. Legal entities established outside of rural areas, can be also eligible if supported investments/activities are located in rural areas.
- The projects under this measure **should be in general of a small scale**.
- Eligible investments:
 - “on-farm investments” – different from investment in physical assets of agricultural holdings
 - **Other investments**, promoted in rural areas, e.g. in villages, to increase the economic activity
- Examples of other investment :
 - providing **services to farmers** (e.g. “machinery rings”, repair of agricultural machinery, etc.);
 - providing any type of **general services to rural population**, such as kindergartens, IT centres, houses for the elderly, transport services, etc., as well as establishing community village centres;

- **local craftsmanship and small scale processing and marketing of local agricultural or forestry products. This may include the processing and marketing of traditional local food or non-food specialities.**

Measure Improvement of training

- Purpose of the measure – **to improve the occupational skills of persons engaged in the agricultural/ food/ forestry sector /craftsman / fishery/rural tourism**
- Final beneficiaries **are the training providers**; participants – the persons engaged in the agricultural/food/forestry sector
- Assistance only for courses which are not part of normal programmes or systems of education at secondary or higher levels
- The country should prepare a training needs assessment (analysis of the training needs and objectives; criteria for the selection of training providers; curriculum of possible training courses)
- Eligible costs: (a) costs related to the organisation and delivery of training courses; (b) accommodation and meals. Per diems are not eligible
- Training providers can be: **private, public, national, from EU and candidate countries**
- **Demonstration/study visits can be included as part of the programme of a training course**

Measure Advisory services

- Beneficiaries of the measure are the authorities or bodies providing advice and can include: public advisory services, sector organisations (such as agricultural chambers), development agencies, NGOs, municipal councils, etc.).
- **Advice shall be provided free of charge to farmers, forest holders and SMEs in rural areas.**
- Eligible expenditures
 - Group advises
 - costs related to the preparation of applications for aid and project plans; costs of advisory services provided during project implementation, such as preparation of payment claims;
 - **costs of training of advisers related to the IPARD measures costs incurred in organising and delivering the training to the advisers** (e.g., salaries of employees, travel costs, material prepared for the training, costs related with the place where the training is delivered, etc.).

Provisional timeline for IPARD II preparation

The provisional timeline for IPARD II preparation as presented during the workshop “Streamlining implementation of IPARD 2014-2020” organized by EC (3-4 Oct 2013).

Policy document	2013	2014			
	Q4	Q1	Q2	Q3	Q4
IPA Regulation					
Rules of Application					
Strategic IPA Programming Framework					
Country Strategy Papers					
Framework agreements					
2014 Programmes					