



Comisiynydd y
Gymraeg
Welsh Language
Commissioner

Y Pwyllgor Cyllid

Cynulliad Cenedlaethol Cymru

09 Mai 2018

Dear Colleague,

Inquiry into preparations for replacing EU funding streams in Wales following the UK's exit from the EU

Thank you for the opportunity to respond to your inquiry. I would like to emphasise the following points.

- There is a need to assess the economic implications of the UK's exit from the European Union on Welsh speakers and Welsh-speaking communities. It is absolutely essential that Brexit does not undermine the efforts to create more Welsh speakers or to increase the use made of the Welsh language.
- Conditions relating to the support available through European funds currently include Welsh language requirements. The process of agreeing, planning and implementing new funding streams in Wales following Brexit should continue to recognise and respond to the bilingual nature of Wales.
- Discussions on future funding streams provide a valuable opportunity to revisit current funding systems in terms of the consideration given to the Welsh language. Consideration could be given to the subject, implementation methods and methods of evaluating Welsh language requirements and objectives. This could be achieved by undertaking an appropriate review of current arrangements across different European funds.

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1. The context of this response

The principal aim of the Welsh Language Commissioner is to promote and facilitate the use of the Welsh language. In doing so the Commissioner seeks to increase the use of the Welsh language with regards to the provision of services, and via other opportunities. In addition, she will also address the official status of the Welsh language in Wales and, by imposing standards, place statutory duties on organisations to use the Welsh language. One of the Commissioner's strategic aims is to influence the consideration given to the Welsh language in terms of policy development, as is the case here. Further information on the Commissioner's work can be found on the website welshlanguagecommissioner.wales.

2. The economic impact of Brexit on the Welsh language

I have referred elsewhere to the link between the Welsh language and the economy; and to the importance of specific sectors such as the agricultural sector for the Welsh language and Welsh speakers.¹ There is a need to assess the economic implications of the UK's exit from the European Union on Welsh speakers and Welsh-speaking communities. It should be ensure that Brexit does not:

- undermine the provision of programmes and projects in Wales that are essential in creating a skilled bilingual workforce and supporting the use of the Welsh language in the community and in business;
- impact on economic sectors that are important to Welsh speakers and sustain Welsh-speaking communities to a large extent such as the agricultural sector, the creative sector and the post-16 education and training sector.

For further details, see my recent response to the External Affairs and Additional Legislation Committee's inquiry ['Resilience and preparedness: the Welsh Government's administrative and financial response to Brexit'](#).

I argued at the time that it was absolutely essential that Brexit does not undermine the efforts to create more Welsh speakers or to increase the use made of the Welsh language. I called on the Government to give due regard to the Welsh language in all aspects of work relating to Brexit.

¹ See my recent response to the Communities, Equality and Local Government Committee's [Inquiry into poverty in Wales: making the economy work for people on low incomes](#);



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3. Welsh language requirements under the current funding system

Conditions relating to the support available through European funds currently include Welsh language requirements. Under European regulations, 'cross cutting themes' must be integrated into the work of planning and developing activities funded through European Structural and Investment Funds (ESI), including the European Agriculture Fund for Rural Development (EAFRD), the European Regional Development Fund (ERDF), the European Social Fund (ESF) and the European Maritime and Fisheries Fund (EMFF).² Although some cross cutting themes (such as Equal Opportunities) must be included, it is possible to add to them in accordance with British or Welsh equality policy.

European regulations do not require language to be considered in the context of these themes. However, the Welsh Government decided that the equality objectives for European programmes in Wales should include 'identify[ing] and support[ing] opportunities to promote and facilitate the use of the Welsh language'.³ According to the Welsh European Funding Office (WEFO), funded operations can contribute to these objectives by, e.g.

- ensuring that Welsh language services are actively promoted;
- ensuring that operations contribute to increased provision of Welsh language services and increased use of Welsh by participants; improved Welsh language skills and enhanced economic opportunities in Welsh-speaking areas;
- monitoring progress and positive outcomes regarding the Welsh language.

They can also '[ensure] that all operations and grant-funded services are available through the medium of Welsh and that these services are actively promoted'.⁴

The Welsh Government's incentive to include Welsh as a cross cutting theme is commendable. Despite the fact that the language is not a protected characteristic under the Equality Act 2010, the rights of Welsh speakers in Wales are affirmed by the Welsh Language (Wales) Measure 2011. The Welsh language is also one of the well-being aims in the Well-being of Future Generations (Wales) Act 2015. Albeit differently, these two pieces of legislation provide for a country where the Welsh language is at the heart of public policy.

As a result, it is essential that the process of agreeing, planning and implementing new funding streams in Wales following Brexit recognises and responds to the bilingual nature of Wales. At a completely basic level, this means that the funding conditions should provide for the costs incurred in complying with Welsh language requirements, such as translation costs.

² Also, for rural development programmes under CAP, priorities include social inclusion, tackling poverty and economic development in rural areas. https://ec.europa.eu/agriculture/rural-development-2014-2020_en

³ <https://gov.wales/docs/wefo/publications/170620-cross-cutting-themes-key-document-european-social-fund-en.pdf>, p. 5;

<https://gov.wales/docs/wefo/publications/170620-cross-cutting-themes-key-document-european-regional-development-fund-en.pdf>, p. 5.

⁴ <https://gov.wales/docs/wefo/publications/170620-cross-cutting-themes-key-document-european-social-fund-en.pdf>, p. 10;

<https://gov.wales/docs/wefo/publications/170620-cross-cutting-themes-key-document-european-regional-development-fund-en.pdf>, p. 11.



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At a higher level, they should allow for the promotion and facilitation of the Welsh language and deliver outcomes for Welsh speakers and communities where the language is spoken.

4. Extending and strengthening Welsh language requirements

Having said that, discussions on future funding streams provide a valuable opportunity to revisit current funding streams in terms of the consideration given to the Welsh language in terms of the subject, the implementation method and the method of evaluating the requirements and objectives of the funding. This could be achieved by undertaking an appropriate review of current arrangements across different European funds. For example, under current guidelines, it is not 'compulsory' for funded operations to contribute to Welsh language objectives. The current wording does not suggest either that services must be operated and provided bilingually. Consideration could be given to strengthening those requirements.

I also understand that, historically, there have been very few interventions under European support programmes which have actively targeted Welsh speakers, and have been tailored to meet their needs. This was one of the conclusions of the RDP evaluation in 2014.^{5,6} However, as far as I know, only a handful of projects which have received European support during recent years have put the Welsh language at the heart of their activities. One such project which benefited from the European Agricultural Fund for Rural Development was 'Marchnad Lafur Cymraeg' by Four Cymru in partnership with Mentrau Iaith Cymru.⁷

I also believe that it is worth revisiting the current methods of measuring and evaluating the impact of operations on the Welsh language. WEFO is currently collecting specific data on the Welsh language, and targets will be set in accordance with this data. For example, for ESF projects, requests are made for data on the linguistic ability of participants, their preferred language and the language of provision.⁸ In addition, in June 2015, WEFO decided to introduce additional indicators at project level in order to facilitate the work of recording good practice with regard to the cross cutting themes.⁹ (Please note, I am unclear as to the extent to which similar indicators are used for projects under the Rural Development Plan, which follow a different evaluation process to ESF and ERDF projects).¹⁰ As the current funding system comes to an end, we could use the opportunity to revisit the types of data collected and targets set, and review their weaknesses and strengths.

⁵ <http://gov.wales/docs/drah/publications/141114-rural-development-programme-environment-impact-assessment-sept-report-en.pdf>

⁶ Welsh Language Commissioner, The Potential of the Welsh Language to Contribute to realising the aims of the European Funding Programmes 2014-2020; Mentrau Iaith Cymru, Cynllun Marchnad Lafur Cyfrwng Cymraeg; [Report of the Task & Finish Group on Welsh Language and Economic Development](#) (January 2014);

⁷ The aim of this project is to 'develop the Welsh language as an economic catalyst to develop and revitalise Rural Wales'. <http://four.cymru/wordpress/wp-content/uploads/2017/09/Marchnad-Lafur-Cymraeg.pdf>

⁸ <https://gov.wales/docs/wefo/publications/180502-pmc-papers-may-2018-en.pdf> p. 4

⁹ <https://gov.wales/docs/wefo/publications/171129-pmc-papers-dec-17-en.pdf> p. 156

¹⁰ Monitoring and Evaluation Strategy: European Structural and Investment Funds 2014-2020 – Update 2017, <https://gov.wales/docs/wefo/publications/171129-pmc-papers-dec-17-en.pdf>



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Conclusion

I trust that you will find the above comments useful. I encourage the Committee to give these comments careful consideration during the inquiry.

Yours sincerely,

Meri Huws

Welsh Language Commissioner