Evaluating the Peace-Building Impact of Structural Funds Programmes

The EU Programme for Peace and Reconciliation in Northern Ireland

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The 'distinctiveness criteria' are an instrument of peace and conflict impact assessment (PCIA) applied to the EU Programme for Peace and Reconciliation in Northern Ireland and the border counties of Ireland (Peace II). This article evaluates the capacity of the 'distinctiveness criteria' tool, as applied, to generate a peace-building impact for the fund. While the criteria are found to have influenced project design, their potential impact is weakened by a relatively narrow and quantitative application at assessment, monitoring and evaluation stages, and by the absence of independent conflict analysis. A stronger monitoring and evaluation culture at the project level could increase the impact of the criteria and, therefore, the peace-building impact of the programme, and could help the framework to avoid some of the weaknesses generally associated with PCIA.

KEYWORDS: development; evaluation; peace and conflict impact assessment; peace-building; structural funds

Introduction

Northern Ireland at the time of writing in 2005 is in transition from a conflict to a post-conflict society. The transition is marked by the contentious and incomplete implementation of the Belfast Agreement (1998); poor relations between the nationalist and unionist communities illustrated by a growing tendency towards highly segregated housing (over 90% in public housing areas) and provision of services; ongoing breaches of the ceasefires and the replacement of formal violence with an increase in the number of violent sectarian incidents which have heightened tension at a series of interface areas across Belfast, Derry and in some rural areas.[1] Apathy characterizes a significant proportion of the middle classes, who appear to be comfortable in a culture of silence and avoidance, a culture

reinforced by an education system that is almost completely segregated along religio-ethnic lines.[2] Despite apathy, which characterizes the attitudes of some in the Republic of Ireland towards Northern Ireland, the relationship between the two parts of the island remains a divisive issue which the Belfast Agreement only partially addresses.[3] The border continues to exacerbate cultural differences and distrust and to perpetuate political conflict in Northern Ireland (O'Dowd and McCall, 2004).

The resolution of the conflict at the political level through the full implementation of the Belfast Agreement remains an enormous challenge that both impacts on, and is affected by, peace-building work at the grass-root level. The challenges for those involved in peace-building work have been summarized by a group of peace-building practitioners and academics as:

1. managing violent disorder and anti-social behaviour at a local level;
2. containing localized outbreaks of violence to avoid a knock-on escalation of violence in other areas;
3. developing strategies that reduce opportunities for those who retain an interest in perpetuating violence at a local or regional level to do so (this frequently relates to intra-group relations);
4. addressing socioeconomic issues that feed cycles of conflict;
5. moving beyond conflict management to help reduce negative perceptions and to build long-term trust between communities;
6. promoting reconciliation where the roots of conflict remain in dispute (in this case the border and the root causes of the conflict) and where reconciliation frequently has competing interpretations.[4]

The Peace II Programme funds a large proportion of this peace-building work by supporting a range of cross-community, cross-border and/or capacity-building projects run by community and voluntary organizations, businesses, statutory agencies and non-governmental organizations. Its funds are divided into five priority areas: (i) economic renewal; (ii) social integration, inclusion and reconciliation; (iii) locally-based regeneration and development strategies; (iv) outward and forward-looking region; (v) cross-border cooperation (between NI and border counties of ROI).[5] The programme is implemented by a range of local implementing bodies and coordinated by a managing authority (Special EU Programmes Body). Implementing bodies are either intermediary funding bodies (NGOs or independent statutory organizations), local strategy partnerships (area-based local partnerships between the government and social partners) or government departments.

Peace II is a unique EU structural funds programme in that it aims, through the activities that it funds, to have a peace-building impact: to 'reinforce progress towards a peaceful and stable society and to promote reconciliation' (European Commission, 2000: 41). Reflecting this, the programme's five priority areas are to be pursued 'in light of specific objectives' (European Commission, 2000: 41–4) known as the distinctiveness (and reconciliation) criteria.[6]

Objective 1. Addressing legacy of the conflict: i.e. the programme will address specific problems generated by the conflict in order to assist the return to a normal peaceful and stable society.

Objective 2. Taking opportunities arising from peace: i.e. the programme will encourage actions which have a stake in peace and which actively help to promote a stable and normal society where opportunities for development can be grasped.

Objective 3. Paving the way to reconciliation: i.e. the programme will build an inclusive process and promote actions that will pave the way to reconciliation.

The programme's designers included the distinctiveness criteria to ensure that the socioeconomic development fund would simultaneously contribute to the process of building peace. In this sense the distinctiveness criteria have piloted a type of peace and conflict impact assessment (PCIA).

PCIA is a design, assessment and evaluative set of tools that aim to enhance the impact of development and peace-building programmes on conflict prevention and peace-building or, at least, to ensure that development programmes do not ultimately exacerbate conflict. Viewing peace-building as an impact rather than as a specific type of activity, proponents suggest that PCIA be used to assess and evaluate the impacts of proposed and completed projects on structures and processes that (i) increase the likelihood that issues will be dealt with peacefully and (ii) increase the likelihood that issues will be dealt with violently (Bush, 1998; Hoffmann, 2001: 7). PCIA has been defined as

> . . . a planning and management tool that can assist . . . organisations in analysing situations of potential (and actual) conflict and identifying strategic opportunities for conflict prevention and peace-building; it can also be adapted for monitoring the impact of these activities. (Leonhardt et al., 2002)

Three components are considered necessary for its successful application: conflict analysis at design stage; application at screening, assessment and evaluation stages of the funding process; and a peace-building framework from design to implementation (International Alert et al., 2000: 3–4).

Critics and users of PCIA alike highlight two key weaknesses. First, analysts and practitioners, including International Alert, highlight the need for those using PCIA tools to promote local dialogue and ownership so that approaches are tailored to local needs and priorities (International Alert et al., 2000: 5; Leonhardt et al., 2002: 10). Second, critics point to the failure of PCIA, to date, to establish and attribute the peace and conflict impact of programmes (Leonhardt, 2003: 8). Establishing and attributing a peace impact raises questions about the definition of peace-building and of the type of peace that different stakeholders aim for and agencies promote (Leonhardt, 2003: 6). This adds to the complexity of applying PCIA.

International Alert suggests that the more frequent application of the tools and of efforts to evaluate their impact on peace and conflict dynamics (2000: 5–6) would help to improve PCIA. This article evaluates the usefulness of the

distinctiveness criteria *as a mechanism* to generate a peace-building impact. It considers the three essential components of PCIA identified and centres on three sets of questions. First, are there adequate procedures in place to ensure that the objectives of the distinctiveness criteria are actually pursued, i.e. how are the criteria operationalized? Second, do these procedures ensure that funding is actually channelled towards projects that have an impact, through their activities, on addressing the legacy, taking opportunities arising from peace and paving the way towards reconciliation? What do these peace-building activities and projects look like? Third, what conclusions can we draw from the analysis for the application of PCIA to development and peace-building programmes generally? To what extent does the application of the framework in Northern Ireland include or overcome the identified weaknesses of PCIA?

The research is based on a study of the programme's documentation, interviews with implementing bodies (Co-operation Ireland, ADM-CPA and Community Foundation for Northern Ireland), a review of procedures followed by implementing bodies and a micro-level analysis of 20 projects funded under two measures of the Peace II Programme. Projects funded under Measures 5.3 (cross-border reconciliation) and 5.1 (cross-border economic development) were selected.[7] First, there are three types of implementing bodies in the Peace Programme – government departments, intermediary funding bodies (IFBs) and local strategy partnerships. An independent report highlighted IFBs as applying the most consistent and thoughtful process to the application of the distinctiveness criteria (Harvey, 2003). As Measures 5.1 and 5.3 are implemented by IFBs, there should be a stronger likelihood that projects have identified ways in which they will address the legacy, opportunity and reconciliation criteria. Second, measure 5.3 is one of the two measures in the programme that specifically mentions 'reconciliation'. This increases the likelihood that projects funded under it will have identified peace-building goals. Third, as connected to the cross-border consortium responsible for their administration, the author has considerable knowledge of Measures 5.3 and 5.1 and full access to project files.[8] Only projects that were up and running for a year or more in July 2004 were selected for the micro-level analysis.

Evaluating the Distinctiveness Criteria

How are the Criteria Operationalized?

Screening and assessment stage   Table 1, which is based on the programme's guidelines, outlines the goal and objectives of the distinctiveness criteria and the procedures in place to achieve these objectives.

Table 1 suggests that the effectiveness of the criteria depend heavily on implementing bodies' interpretations of the legacy of the conflict, opportunities offered by peace and of the types of actions that pave the way towards reconciliation. One might expect that, in order to inform their delivery, and the scores which they assign to each applicant, implementing bodies have engaged

Table 1.   The Distinctiveness Criteria: Objectives and Outputs

Macro Goal	Objectives	Outputs/Activities in place to ensure success of distinctiveness criteria
To use the Peace II economic and social fund 'to reinforce progress towards a peaceful and stable society and to promote reconciliation'.	**1. To address the legacy of the conflict:** address specific problems generated by the conflict in order to assist the return to a normal peaceful and stable society.	During the application/assessment process: 1) Applicants must outline how their activities address the legacy of the conflict. 2) **Targeting:** applicants must show relevance to areas, sectors, groups and communities suffering the legacy of the conflict. 3) Implementing bodies should reject those that have not met this distinctiveness criteria[a] (either objective 1 or 2). 4) Implementing bodies can accept projects with the proviso that they change or develop activities which ensure that they more effectively address the legacy of the conflict.
As above	**2. To take opportunities arising from peace:** encourage actions which have a stake in peace and which actively help to promote a stable and normal society where opportunities for development can be grasped.	During the application/assessment process: 1) All projects have to outline *how* their activities take opportunities that arise from relative peace (i.e. show that it could not have happened without peace and/or that it is building a community that will have a stake in peace. 2) **Targeting:** applicants must show relevance to areas, sectors, groups and communities able to take opportunities arising from peace. 3) Implementing bodies should reject projects that have not met the distinctiveness criteria (either objective 1 or 2). 4) Implementing bodies can accept projects with the proviso that they change or develop activities that or more effectively take opportunities arising from peace.
As above	**3. To pave the way towards reconciliation**	During the application/assessment process: 1) All projects must outline the extent to which their project will help pave the way towards reconciliation and/or will

Table 1. Continued

Macro Goal	Objectives	Outputs/Activities in place to ensure success of distinctiveness criteria
		add further dimensions to the project to ensure that this goal is met (if required by the implementing body).
		2) Projects can be rejected by the Implementing Body on this basis.
		3) Implementing Bodies can fund projects on the condition that activities are added or changed to enhance the project's impact on paving the way towards reconciliation.

Note: The distinctiveness criteria – (1) legacy, (2) opportunity and (3) reconciliation – together account for 30 of the 100 points out of which projects are assessed. Regardless of their score on the measure-level criteria, projects must 'pass' the distinctiveness criteria in order to be considered for funding.

in in-depth analyses of the conflict and its legacies, of opportunities to underpin peaceful relations, and to promote reconciliation.

However, instead the operational programme and the managing authority's guidelines during the first year of the programme proposed a standard approach to applying the distinctiveness criteria at the assessment stage. Programme guidelines say that projects eligible for assistance 'should focus *on the needs of areas, sectors, communities and/or groups* adversely affected by political unrest and demonstrate that they will contribute to the programme's specific objectives on legacy and opportunity' (European Commission, 2000: 45). Box 1 defines these areas, sectors and groups.

In response to queries from implementing bodies about the application of the criteria and indicators, the managing authority recommended that the legacy and opportunity objectives 'are social and economic and *will be covered* by the range of indicators produced for areas, sectors and groups' (SEUPB, 2002b: 9). Guidance packs subsequently published by implementing bodies[9] and development advice to applicants tended to outline how projects based in certain deprived areas and involving particular sectors and groups would be eligible for funding.

The impression that targeting (see Table 1) is the predominant interpretation of the distinctiveness criteria was reinforced throughout 2003. That one-third of applications were rejected because they failed to meet the distinctiveness criteria was cited by the managing authority as 'a positive sign that *targeting* was working effectively' (House of Commons, 2002–3: 29). The framework for scoring projects at assessment encourages legacy and opportunity to be assessed purely from the perspective of targeting areas, sectors and groups: applicants are allocated a maximum of 30 points for the distinctiveness and reconciliation criteria, 8 for area, 8 for sector, 8 for group and 6 for reconciliation. A review of how implementing bodies are applying the criteria confirmed this emphasis

on targeting and suggested that while some implementing bodies reported that they operationalized 'legacy' and 'opportunity' in more ways than through the targeting of areas, sectors and groups, the documented evidence of this was sketchy (Justice Associates, 2003: 22).

Box 1.   Areas, Sectors and Groups Targeted by the Programme

- **Areas**
  Areas with high levels of relative deprivation;[a] border areas; areas that have suffered disproportionate levels of violence and that suffer from high levels of community division, segregation, displaced persons, for example sectarian interfaces, or infrastructure destruction.

- **Sectors**
  The private and entrepreneurial sector and projects that encourage the start-up or development of business in these sectors (especially ICT and business services); projects that target other legacies of the conflict by encouraging investment and developing sectors especially affected by conflict – tourism, the arts, sport[b] and new business sectors.[c]

- **Groups/communities**
  Communities in deprived areas or deprived communities in otherwise relatively affluent areas; distinct groups that have suffered disproportionately such as ex-prisoners and their families; ex-security force members seeking employment; victims, including the disabled and their families; displaced people, young people and older workers whose employability has been restricted; other groups facing continued and significant disadvantage as a result of the conflict and community division.

- **Reconciliation, mutual understanding and respect**
  Reconciliation, mutual understanding and respect to be facilitated/enhanced between communities in Northern Ireland and between communities north and south. Each project should highlight the cross-community and cross-border elements. If the focus is on a single-identity community, the promoters should highlight how it will ultimately improve cross-community relations.

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[a] This is based on the assumption that the role of regional instability has been an important factor in the spatial distribution of economic disadvantage in Northern Ireland and that efforts to reduce relative deprivation address the legacy of the conflict in these areas.

[b] Sporting activities have become associated with one or other of the largest communities and this sector is therefore targeted as having a significant potential to take opportunities arising from peace to be a focus for reconciliation.

[c] A further legacy of the conflict is the centrality of public sector employment to the regional economy and the relative weakness of the private sector (in NI and border counties of ROI). This legacy is linked to a shortage of local entrepreneurship and investment seen as the result of conflict and instability.

Therefore, considerable importance is attached to the distinctiveness criteria at the assessment stage.[10] However, most implementing bodies interpret addressing legacy and taking opportunities arising from peace as achieved through the targeting of areas, sectors and groups. These indicators only measure, in part, the extent to which a project's actions will address the legacy, take opportunities and pave the way to reconciliation. It may be difficult to tell whether or not a 'high score' on targeting ensures a funding bias towards projects which through their activities address the challenges of peace-building. Further, pressure to target areas, sectors and groups, in order to pass the distinctiveness section, may limit the extent to which projects articulate their own, local interpretation of legacy, opportunity and reconciliation.

The importance attached, and the approach taken, to the monitoring and evaluation of distinctiveness, may counter-balance the bias towards targeting in the assessment process and encourage a more qualitative application of the criteria.

Monitoring and evaluation procedures Each measure of the Peace II Programme has specific programme-level indicators of achievement: anticipated outputs, results and impacts. Implementing bodies monitor achievement of quantifiable outputs and results for their measures and achievement of outputs and results are recorded on a central database. This database, which monitors quantifiable outputs and results, is the primary tool for assessing the extent to which the objective of each measure and, therefore, of the entire programme, is being achieved. The overall impact of all measures will be assessed in a Final Macro-Level Evaluation of the Peace II Programme which will draw heavily on information from the database.

The programme's peace-building (distinctive) goals do not feature in these measure-level indicators. Instead, the distinctiveness criteria are treated as a horizontal principle (SEUPB, 2002a). Any detailed, formal evaluation of the impact of the distinctiveness criteria, or of the peace-building impact of the programme, will take place at the macro level and will focus on the most clearly quantifiable 'indicators of change'. This approach is detailed in Table 2.

Using Table 2, the successful addressing of the legacy and taking of opportunities is indicated by a high percentage of projects funding activities in targeted areas and including targeted groups and/or sectors. The number of projects rejected on each measure because they have failed to meet the legacy, opportunity (targeting) or reconciliation criteria (percentage of cross-community versus single-identity projects) would also be an indication of the extent to which the criteria are working successfully.

Taking this approach, the managing authority published the information in Table 3 (SEUPB, 2004) to highlight the extent of the programme's success to date in targeting distinctiveness.

Table 2. Logframe for an Evaluation at the Macro Level

Objective	Output/Activity	Indicator of 'Success'	Sources of Verification
1. Legacy 2. Opportunity	Targeting of areas	% of projects concentrated in: deprived areas; areas that suffered high levels of violence and disturbance; areas with significant inter-community tension	TSN ward-level data on relative deprivation; History of the Troubles project data and police data; % of each community living in certain areas; level of conflict currently
1. Legacy 2. Opportunity	Targeting of sectors	% of projects involving sectors outlined as suffering the legacy of the conflict	Data from applicants about sector in which project is concentrated
1. Legacy 2. Opportunity	Targeting of groups	% of projects involving victims, ex-prisoner groups, etc.	Data from applicants about sector in which project is concentrated
1. Legacy 2. Opportunity	Application of distinctiveness criteria	% of projects rejected for not meeting the distinctiveness criteria	Data from implementing bodies
Reconciliation	Application of reconciliation criterion	% of projects rejected for not meeting the reconciliation criterion	Data from implementing bodies
Reconciliation	Application of reconciliation criterion	% of projects that are cross-community versus single identity	Data from projects and IBs

There are difficulties with this analysis. Table 3 tells us something about the success of implementing bodies in targeting funding, i.e. about the extent to which some of the activities designed to achieve the distinctiveness objectives have been successfully applied. But by excluding the peace-building criteria from the measure-level indicators, and/or by not requiring in-depth analysis of the impact of each measure, let alone their impact on peace-building, this monitoring system will fail to establish whether or not the money has achieved the programme's most fundamental goals: its peace-building goals. Some implementing bodies will produce evaluations that explore the extent to which the outputs and results actually achieved the objectives/impacts of their measure(s) and may even consider the peace-building impact. These should feed into a macro-level evaluation of the Peace II Programme. However, this is not a requirement of the managing authority or the EU Commission.

Table 3. Targeting Distinctiveness: Breakdown in Areas, Groups and Sectors May 2004

Areas	Total	
	% of projects	% of value
Disadvantaged area(s) experiencing or which has experienced relatively high levels of violence	65	63
Area(s) such as sectarian interfaces where inter-community conflict and dispute is high and community relations are correspondingly poor	39	47
Disadvantaged area(s) whose image and attractiveness as an investment location has been adversely affected by local violence or community tension	53	57
Area(s) suffering the effects of physical dereliction (including damaged infrastructure) as a consequence of the conflict	34	42
Area(s) isolated by border closures	20	27
Area(s) with a high concentration of displaced persons as a result of the Troubles	21	27
Area(s) where social and economic development has been inhibited by the conflict	70	63
Other area(s)	17	17
Groups		
Victims of conflict, i.e. the surviving injured and/or disabled – either physically or psychologically – of violent, conflict-related incidents and those who care for or are related to them, along with close relatives who mourn their dead	30	34
Ex-prisoners and their families, i.e. qualifying prisoners who were or would have been released under the terms of the Good Friday Agreement	18	28
Displaced persons, i.e. those who have involuntarily moved from areas of violence or interface areas and communities in which there is a concentration of displaced persons	19	24
Young people, women and older workers insofar as they have been prevented from fulfilling their potential in society or in the labour market	66	59
Former members of the security and ancillary services facing additional employability needs	10	16
Other groups/communities	38	33
Sectors		
Tourism	23	13
Entrepreneurship including ICT and business services	25	40
The arts and sport	20	12
Other sectors	32	34

Note: Analysis based on 2,138 projects, value €312m.

The most fundamental difficulty with the formal operating of the criteria at assessment and evaluation stages relates to the extent to which the targeting indicators (a) help us to understand the impact of the programme on peace-building and (b) really create incentives for projects to consider their potential to have a peace-building impact. In a worst-case scenario, could a project that primarily involves marginalized groups, and is based in a disadvantaged area that has experienced a high level of conflict, aggravate inter-community relations and/ or reinforce the legacy of the conflict through its activities, in spite of its high score on targeting distinctiveness? Furthermore, without mechanisms designed to assess the extent to which projects address the legacy of the conflict, take opportunities arising from peace and pave the way to reconciliation throughout the life-time of the project, even projects that have outlined activities through which they will pursue this may be less likely to take these activities seriously. Once the project has passed the distinctiveness criteria at assessment stage, it may have little incentive to give the peace-building impact of the project further consideration.

This scenario would be unlikely to materialize if the distinctive activities were monitored by projects themselves and by implementing bodies throughout the lifetime of a project. It is clear that the monitoring system does not require this to happen. However, the question remains as to whether or not implementing bodies and projects have used the distinctiveness framework to ensure that it does happen. The answer to this question is unclear from the macro-level analysis and it requires taking a closer look at projects. The questions explored by the micro-evaluation appear in Box 2 below.

Box 2. Questions in the Micro-Level Analysis

- **Role of implementing bodies in pursuing a 'distinctive' impact**
  1. How has the implementing body ensured that a 'conflict-sensitive'/distinctive approach extends beyond assessment stage to inform the full implementation of all projects?
  2. Is it reflected in the contract and in monitoring and evaluation procedures?

- **Impact on project design and implementation**
  1. Did the criteria change the design and activities of the project during the planning and implementation stages?
  2. Have they encouraged promoters to think about the impact of their proposed development project on the challenges to peace-building?
  3. Have they forced project promoters to think about the legacy of the conflict on their group, sector or area?
  4. What types of activities do projects undertake to address the legacy of the conflict/ take opportunities arising from peace and pave way to reconciliation?

Role of implementing bodies in further applying the framework   The analysis, which is based on project applications, assessment reports, contracts or 'letters of offer' from the implementing body, and interviews with the project promoters, aimed to establish the extent of monitoring and evaluation by implementing bodies of activities designed to meet the distinctiveness criteria.

As predicted, applications under the cross-border economic development or reconciliation themes that are strong on the targeting of areas, sectors and groups score highly on the distinctiveness criteria. Notwithstanding this, projects frequently go to some lengths to outline how the activities that they pursue (targeting aside) will enable them to address this legacy, take opportunities and pave the way to reconciliation. If these activities are translated into actions in the letter of offer (contract) agreed between implementing bodies and projects, it should create incentives for projects to both implement and monitor the achievement of activities designed to have a peace-building impact.

For the cross-border reconciliation measure, projects highlight activities that promote ongoing and in-depth cross-border and cross-community contact, through media such as sport, arts, music, civic education and community development, throughout the lifetime of a project as addressing legacy and taking opportunities. The contract almost always includes the furthering of mutual understanding or peace-building on a cross-border basis as an objective.

For the cross-border economic development measure, activities specifically designed to promote the distinctive goals sometimes appear in the contract. Where they were not included this was sometimes because the project was funded for its strength in outlining the legacy but was vague on how it would address it. In these cases the contract was equally vague on how activities would address the criteria. Other times they were not explicitly included because projects argued that, by achieving their narrower, more specific goals, they were actually taking opportunities arising from peace to address the legacy of conflict. In other words, it was not possible to separate activities that promote cross-border economic development from those that address legacy and take opportunities.

In the case of paving the way to reconciliation, the assumption is made for both measures that sustained cross-border and cross-community contact and cooperation between groups of people through activities that promote mutual benefit for all do 'pave the way to reconciliation'. A clause frequently appears in the letter of offer specifically requesting projects to promote reconciliation by including contact between businesses or people from different community backgrounds and traditions. Another clause often appearing in the letter of offer for cross-border economic development projects requests that projects provide the implementing body with an outline of the actions they intend to take to pave the way to reconciliation.

In sum, the contracts vary in the degree to which they specifically outline how a project will promote the distinctiveness goals of the programme. Where they do appear in the contract, whether explicitly highlighted, or included as activities that will implicitly promote distinctiveness by addressing the measure's objectives, they tend to be 'objectives', rather than 'outputs'. Are there mechanisms to ensure that these objectives are pursued and achieved through the project's activities?

Projects funded by Co-operation Ireland and ADM-CPA are almost all required to have an external evaluation of their project, at least once, and preferably twice, during the lifetime of the project.[11] As well as serving to ensure accountability, these external evaluations aim, in theory, to assess the extent to which projects' outputs and results actually achieve objectives, including peace-building objectives, and to outline how the project might better achieve its objectives. However, an analysis of these evaluations shows that, almost without exception, they comment on the achievement of the outputs and outcomes (results) that appear in the letter of offer. Therefore, if an applicant outlined in detail how a project's activities would address the legacy of the conflict, but this was not translated into outputs or results in the letter of offer, an evaluator is unlikely to assess, but instead will assume, the achievement of these objectives.

A recent paper (Taillon, 2004) highlighted an underdeveloped evaluation culture in the Peace Programme, a finding that is confirmed by this research. Evaluators tend to focus narrowly on the achievement of outputs and results, as outlined in the letters of offer, and to over-rely on interviews with project promoters for data. In their defence, evaluators are often placed at a disadvantage by being appointed halfway through, or at the end of, a project.

Strength of application at screening, assessment and evaluation A number of conclusions can be drawn, and recommendations made, about the application of the distinctiveness criteria at screening, assessment and evaluation. First, the preoccupation with the targeting of areas, sectors and groups at screening, assessment and monitoring stages encouraged by the programme's procedures, may be at the expense of operationalizing a more qualitative process that asks projects themselves to explicitly set out how their activities are addressing a legacy, taking an opportunity to build on peace and promoting reconciliation. This system has the potential to limit the extent to which local, grass-roots organizations are encouraged to define, and address, the challenges of peace-building in their particular area or sector. The programme should clearly separate targeting from this qualitative process of outlining distinctive goals at assessment and evaluation stages. The extent to which this qualitative planning process takes place currently depends on the implementing body, the importance it attaches to the distinctive goals, its capacity to devote time to these goals, and on the quality of evaluation at the micro-level.

The micro-analysis highlights the important role that implementing bodies can play in using the criteria to strengthen the peace-building impact of the programme. In order to enhance the impact of the distinctiveness criteria through monitoring and evaluation, all contracts should include a section that outlines how the project, through its activities, will address the distinctive goals. This would ensure that the project's progress on addressing the legacy, taking opportunities and paving the way to reconciliation, through its activities as outlined in the application, will at least be explored by evaluators. Second, project promoters and implementing bodies should ensure that evaluators are appointed before a project commences. That way the promoter and the evaluator can agree on the information to be gathered on an ongoing basis to measure the achievement of

peace-building objectives. This will increase the incentives for projects to reflect on peace-building goals as well as helping implementing bodies to better evaluate the peace-building impact of (their section of) the programme.

These recommendations highlight the significant role that evaluation, in particular at the micro-level, can play in determining the ability of the distinctive and reconciliation criteria to fulfil the goal of making a social and economic development programme into a programme with a peace-building impact. An evaluation system has a critical role to play in creating:

- incentives for projects to reflect seriously on the peace-building impact of their project;
- space (opportunities for funding) for projects that are promising in terms of their proposed peace-building impact; and
- incentives for locally articulated legacies and opportunities.

The evaluation approach and methodology is also critical if PCIA is to succeed in its goal to highlight, as well as to encourage, a peace-building impact. This will now be further considered.

Peace-Building Framework and Conflict Analysis

A peace-building framework is a second, essential, component of PCIA (see 3 components for its successful application outlined on p. 9). The distinctiveness criteria have added what can be seen as a peace-building framework and the programme's priorities and measures were rationalized at design stage in the context of this framework. The framework presents economic, social regeneration and culturally-focused measures in the context of peace-building and reconciliation goals. For example, the rationale behind the cross-border economic development measure (5.1) is threefold: (i) the weakness of the private sector, in particular indigenous SMEs in new business sectors, in NI and the border counties of the Republic is a legacy of the conflict that cross-border economic cooperation can help to overcome; (ii) economic regeneration resulting from this will provide the economic environment and employment to underpin peace-building; and (iii) the measure should create a constituency of people and economic actors who have a stake in the cross-border cooperation and contact that peace has allowed. Contact should lead to the normalization of relations between groups on either side of the border and to an increase in mutual understanding and respect: this paves the way to reconciliation.

The strength of the peace-building framework is assessed by establishing whether or not, in spite of the weaknesses highlighted above, the distinctiveness criteria encouraged projects to undertake activities that address the challenges of peace-building. Promoters were questioned about how the criteria changed the nature of the project during the planning and implementation stages, whether the criteria, and the measure objectives that were rationalized by the criteria, encouraged them to think about the legacy of the conflict on their group, sector or area, about the impact of their proposed development project on relations between

communities in their area, and on addressing the challenges to peace-building. Projects were also asked to outline the types of activities, beyond targeting, that were undertaken to address the legacy of the conflict, take opportunities arising from peace and pave way to reconciliation.

Cross-Border Economic Development

The inclusion of the distinctiveness criteria does appear to have created space for a new type of project exclusively focused on building relationships through the socioeconomic or business sector. For example, one project is run by an umbrella congress of trade unions and encourages unions, employers and communities to identify issues of common interest, to address them, to build on this work to address issues of conflict and division, and to develop joint strategies to tackle intimidation and sectarianism in the workplace. The project is based on the theory that the workplace is fundamentally important to people's lives and is an ideal medium through which to address the frequently unmentionable issues of sectarianism and racism. The idea that, through cooperation on issues of common interest, sustainable and long-term cross-border relationships will be built up between unions at grass-roots level also underpins the project; these networks, it is hoped, will help to normalize relationships across the border.

The distinctiveness framework certainly created the space for this type of activity and the promoter highlighted the framework as directing him towards using issues of common interest as a mechanism to build broken cross-border relationships *and* to address sectarianism and racism (legacies of the conflict). The role of the criteria in helping to establish whether this approach is ultimately successful in addressing some of the challenges of peace-building is less certain. The mid-term evaluation of the project fails to grapple with its impact on peace-building, instead narrowly focusing on the extent to which outputs and results were implemented as agreed. The evaluation assumes that achieving these outputs indicates the achievement of objectives.

Economic development that uses cross-border programmes to spurn business growth, competitiveness and profit is the primary aim of the largest proportion of projects under this measure. This includes projects that provide strategic and policy frameworks in support of cross-border development. When questioned about the impact of the distinctiveness framework on the design of their projects, promoters tend to highlight, above all, how the goals of the measure itself are rationalized in the context of the distinctiveness goals. That is, projects, by meeting the objectives of the measure to further cross-border economic development, are addressing the conflict's legacy of under-development, are taking opportunities to build a cross-border constituency with a stake in peace and, through ongoing contact, are paving the way to reconciliation.

For example, one project links together in a formal company over 20 shell fishers from Northern Ireland and the border counties of Ireland. For the promoters, the legacy of the conflict is an underdeveloped, fragmented aquaculture industry, with producers aligned according to community affiliations and to the side of the border on which they reside. That producers tend to be based in isolated, rural communities, frequently steeped in one tradition or another, has exacerbated

these divisions. The project established INCO – a joint, cross-border, development company run by a board elected by the producers, to jointly market and process the produce of all the individual enterprises. For the promoters, the sustained and mutually beneficial contact between oyster producers created by the project is the project's key contribution to peace-building. The project's practical benefits – the strengthening of the all-island aquaculture sector, increase in turnover and in the sustainability of all members of the initiative – will ensure that this contact is continued. Sustained contact and cooperation are perceived as enhancing trust and mutual understanding. The promoters contend that the model not only shows producers, but also their communities, that cooperation and greater communication between different communities and across the border has lasting benefits. In this way they perceive their project as paving the way towards reconciliation.

A similar type of project viewed the legacy of the conflict in rural north-west areas of the island as reflected in the 'culture of silence' surrounding political events, the unspoken traditions of Catholics doing business in one shop and Protestants in another, and the pressures on people (from within their own community) not to be seen to fully engage with the other community, especially during times of tension. The project developed a cross-border and cross-community network for SMEs in the food sector that aims to develop their export opportunities both overseas and with each other and to assist any joint ventures identified over the course of the project. The promoters argue that the fundamental goal of the project – to address the weakness of the indigenous SME sector by cooperation for mutual benefit through the Interfood Network – promotes cooperation and contact between people from all traditions *and* creates a strengthened sector with a stake in peace. In this way the model resembles that promoted by the aquaculture initiative.

These projects highlight the role of the peace-building framework during the design of the Peace II Programme. The measure-level objectives have, in theory, been designed to address legacies of the conflict and take opportunities arising from peace. Provided that the assumptions underlying the legacy and opportunities are accurate and reflect local perceptions of the conflict, its consequences and the challenges of peace-building, the application of the peace-building framework at design stage plays a critical role in creating the programme's peace-building impact. But do the legacies outlined always reflect local experience?

A minority of projects do not entirely agree with the legacy and opportunities that have defined the goals of the measure. These projects engaged less easily with the distinctive goals and, more or less, treated them as an obstacle overcome at assessment. They tended to accept the idea that more cross-border economic activity has the potential to improve socioeconomic development in both Northern Ireland and the border of the Republic and, in this way, provide the socioeconomic basis on which to build peace (i.e. more jobs, greater opportunities for people). On the other hand, they questioned whether or not the border remains a specific block to economic development, arguing that businesses will engage in cross-border activity if it is in their interest. On the same theme, they rejected the idea that business has a role to play, beyond economic development,

in peace-building, arguing that 'the border issue and talking about peace and reconciliation does not fit well with the business community'. When reminded that local business people are 'part of the local community' they insisted that, when people have their business hats on, issues pertaining to the conflict do not influence their behaviour.

While grappling to make connections between their projects' activities and peace-building, these projects mostly remarked that the distinctiveness criteria had forced them to think about the project in more than purely business terms. Over the course of their activities, some promoters came to perceive legacies that they had otherwise been unaware of. For example, one project cited a critical legacy in the north-west of Ireland as the reluctance of business people in the Republic of Ireland to do business in Northern Ireland. Whether the criteria have longer term impacts on how these promoters operate as businesses is not something that the framework is currently designed to capture.

Perhaps more important than the detail of their arguments about the rationale behind this particular cross-border measure are the questions that this discussion raises about the assumptions that underlie the distinctiveness framework. These assumptions will be returned to in the conclusion.

Cross-Border Reconciliation Measure

Projects funded under Measure 5.3 are promoted by community groups (including sports or art-based associations), NGOs or public/statutory bodies (e.g. museums) and involve schools, youth groups, ex-prisoners, victims' groups, women's groups and/or sports clubs. The goal of the measure is to encourage cross-border reconciliation through activities that promote culture, heritage and social inclusion. While the objectives are easily rationalized using the distinctiveness criteria, and promoters may find it less challenging to perceive their activities as addressing legacy, taking opportunity and promoting reconciliation, they are simultaneously trying to build the capacity of their own organizations. The distinctiveness criteria are, therefore, important in differentiating the programme from programmes that, for example, exist to build the capacity of the community sector.

Most projects are based on a 'peace-building and reconciliation' strategy that promotes contact through a medium such as art, history, cultural heritage, language or sport. It is hoped that the mutual benefit from these experiences, as well as the contact, will reduce the social exclusion and prejudice perpetuated by a lack of understanding and a lack of opportunity to have contact with the other community. Regarding the extent to which the distinctiveness criteria influenced a project's design, they appear to have created incentives for promoters to include strong cross-border and cross-community elements to a project, to consider the project's long-term impact on cross-border reconciliation, and to have directed funding towards activities that benefit young people in disadvantaged areas who frequently have few social outlets and who could be vulnerable to paramilitary recruiters.

Some promoters said that their project, as previously designed, fitted the criteria. For example, for one project the idea predated the funding and was

based on a model they had previously used, unsuccessfully, to promote cross-community relations in Belfast. It promotes cross-border relations between a loyalist community in a disadvantaged area of Belfast and a community in a disadvantaged urban area of the border county of Sligo through arts, music and other social activities that involve both children and parents from community and youth groups making trips across the border, often for the first time. It climaxes when each community is involved in a five-day festival celebrating the other community's culture (the July Festival in Belfast and St Patrick's Day Parade in Sligo). The project also hopes that stronger cross-border relations will improve cross-community relations between the loyalist community and its neighbouring Catholic communities in Belfast.

For the promoter's community organization in Belfast, the project is about building the capacity of the loyalist community to present their culture and heritage to others – in this case to the people from Sligo (ROI) – and to learn about and accept the culture of others. This is particularly important to Protestant community groups and leaders. There is a perception that for many years nationalists in Northern Ireland have successfully built cultural confidence within their community, while for many reasons[12] the Protestant community has been less effective in doing this. Many groups seek to address this 'imbalance' which, they believe, leaves their tradition misunderstood. In a sense, the distinctiveness criteria's most significant impact on the project may have been the requirement that the cross-border focus of the project be robust and genuine. This encouraged the promoters to simultaneously build confidence within their own community and to use cross-border links to increase understanding of their culture and heritage in the Republic of Ireland. This they see as important to reconciliation on the island, and to mutual understanding between both traditions in the North.

Another project uses cultural heritage as a vehicle to break down cross-border and cross-community barriers in rural border areas. An educational programme engages small, rural, primary schools in a cross-border, cross-community, year-long programme. Students learn about the various people who came to settle in Ireland, are involved in arts-based workshops to support this learning, a concert with their partner schools and other contact-based activities aimed at breaking down barriers. The distinctiveness criteria helped them to design the project, to target specific schools and, importantly, to rationalize every activity with the goals 'to address the legacy of the conflict, take opportunities from peace and pave the way to reconciliation'. The biggest and most time-consuming challenge for the project was that of encouraging the parents and teachers of 20 rural schools to take part in the project. As Protestant communities in border areas frequently feel isolated and under threat, they are sometimes reluctant to engage in cross-border and cross-community activities. The distinctiveness criteria had helped the promoters to set this challenge.

These projects highlight how the criteria can give some promoters credibility within their own organizations to involve the organization in robust cross-border and cross-community activities where they more frequently have a single-community focus. The framework has also ensured that those who are more intent on

using funding to develop capacity within their own community must simultaneously build cross-border and cross-community capacity. Another promoter – for the cross-border orchestra – said that the criteria gave her credibility within her own organization to focus on areas and groups that suffer disadvantage (targeting distinctiveness) where their activity would not normally do so. She perceives the legacy of the conflict in the border counties as lying primarily in the disadvantaged areas of Dundalk and in rural areas along the border and she suggested that music is a vehicle for giving children in these areas more confidence, giving them other things to do. Further, she pointed to the link between groups from different traditions and different musical backgrounds (orchestra and brass band) on both sides of the border, and from all communities, as one of the most successful and sustainable aspects of the project. The distinctiveness criteria, she concluded, enabled her to target disadvantaged areas *and* ensured that she prioritized this cross-border and community link.

Overall, the interviews reveal that, in spite of some operational weaknesses, many projects have engaged positively with the distinctive goals of the programme, and not only with the targeting of areas, sectors and groups. A significant number found the legacy and opportunities outlined in the programme's guidelines to be a relatively accurate reflection of reality; others found the guidelines to be sufficiently flexible to allow for the articulation of a demonstrated, local legacy of the conflict. Most believed that the criteria influenced project design.

The interviews also highlight the assumptions that underlie the programme. For example, how exactly will greater opportunities for cross-border economic development contribute to peace-building? Is this assumption being evaluated? Furthermore, most projects funded by the cross-border reconciliation measure, and indeed the measure itself, are based on the assumption that 'contact' will address legacy, take opportunities and pave the way to reconciliation. This assumption is rarely tackled by evaluations. Further, for most projects, the promotion of contact between people for mutual benefit, and through a shared and uncontroversial medium, is preferable to directly tackling issues related to the conflict. This model of contact is considered to be a relatively strong one by advocates of the contact hypothesis. However, many social psychologists do argue that the saliency of difference needs to be recognized at some point during the contact for the model to be most effective in breaking down barriers (Hewstone, 2004). While some promoters say that the saliency of difference is recognized, and that issues related to it tend to be raised in informal settings, micro-level evaluations do not tend to explore these issues.

This brings us to the broader question about the peace-building framework underlying the programme, the origins of its assumptions and whether not evaluations at the micro-level can evaluate these assumptions.

Strength of Peace-Building Framework and Conflict Analysis

There are some fundamental questions about the assumptions underlying the distinctiveness criteria framework. Does the framework ask the right questions? If projects address legacy, take opportunities arising from peace and take steps towards reconciliation, will they have a peace-building impact? Who defines

legacy, opportunity and reconciliation? What types of actions build peace and who says so? These questions are intrinsically linked to conflict analysis, the third essential component for the successful application of PCIA.

Three components are considered essential for the successful application of PCIA: a peace-building framework at design and implementation stages; application at assessment and evaluation; and pre-programme, strategic, independent conflict analysis. The last component did not feature prominently in the design stages of the Peace II Programme. An open consultation process, which included oral and written submissions from a wide range of implementing bodies and funded projects from the Peace I Programme, did predate the programme, as did recommendations from a mid-term evaluation of the Peace I Programme. However, the most comprehensive and independent assessment of the programme's design suggested it was not primarily determined by the results of in-depth analysis of the conflict and of the challenges of peace-building (see Harvey, 2003).

That priorities other than those based on a theory of peace-building determined the design of the programme may be, in part, because politicians, who are mostly concerned with tending to the perceived needs of their own constituencies and with their own re-election, had a large say in the final design of the programme (see Harvey, 2003). It may also be because civil society organizations constantly battle to balance their need to survive as organizations with the need to achieve their specific objectives (which might be the provision of childcare, addressing social exclusion), and with the desire to simultaneously build peace through their activities. In fact, the consultation encouraged many organizations to highlight their own, individual, specific needs that may or may not have been related to an overall theory of peace-building (see Harvey, 2003). Whatever the reasons for its absence, an independent conflict analysis should inform the objectives and activities of the programme, and would explain the assumptions behind the programme, its absence can only weaken the distinctiveness framework.

Lessons for PCIA

The application of PCIA to a socioeconomic development programme should encourage activity that has a positive impact on structures and processes that make the resolution of conflict through peaceful means more likely: activity that has a peace-building impact. Whether or not the distinctiveness criteria have served this purpose is the true test of their success. A further and related test is whether or not the application of the criteria is fraught with the weaknesses generally associated with PCIA: its inability to pinpoint the impact of activities on peace-building and its tendency to be top–down and to discourage local ownership.

On the first point, even the most cynical of interviewees (and implementing bodies) agree that the distinctiveness criteria have encouraged actors – from implementing bodies to community groups, local statutory agencies, businesses and NGOs – to consider the potential impact of their activities on the legacy of the conflict and on relations between communities in their areas. This has

clearly affected the design of projects. Many implementing bodies and projects suggested that this approach to programme and project design would influence organizations' behaviours beyond the lifetime of the programme. This effect of the distinctiveness criteria was in spite of weaknesses in their application, both at assessment and evaluation stage and in the conflict-analysis component. This suggests that, if these weaknesses were addressed, the capacity of the criteria to create a peace-building impact would be enhanced.

The article includes a number of recommendations on how the application of the PCIA framework at assessment and evaluation stages could be improved. These include removing the emphasis from targeting at assessment and evaluation stages to allow for a more qualitative assessment of a project's ability to address legacy, take opportunities and pave the way to reconciliation. In 2004, the managing authority appeared to recognize the weaknesses in the monitoring and evaluation framework and requested that implementing bodies produce annual reports outlining how projects are addressing the distinctiveness criteria. This creates incentives for implementing bodies to encourage projects to outline actions, beyond targeting, with which they will address distinctiveness. Furthermore, a proposal for the extension period of the Peace II Programme was circulated to implementing bodies in October 2004.[13] It proposes increasing the reconciliation focus of the extended programme and taking some of the emphasis off the targeting of distinctiveness.[14] This should shift the focus to a more qualitative assessment of how a project can address the distinctiveness criteria. The findings in this article predict that these changes will improve the distinctiveness framework and its ability to promote a peace-building impact. However, these changes should be accompanied by evaluations at the micro-level that explore the assumptions linking projects' peace-building objectives to their outputs and outcomes.

This type of evaluation will improve both the assessment and monitoring component of PCIA, as well as compensating for the absence of independent conflict analysis. The most fundamental flaw in this application of PCIA to Northern Ireland is the absence of independent conflict analysis and the unexamined assumptions that underlie the distinctiveness framework. While independent conflict analysis can be politically complex in areas that remain divided about the root causes of conflict, it is not inconceivable that actors involved in peace-building could engage in some conflict analysis to agree on the challenges of peace-building like those outlined in the introduction. The activities of all projects could be assessed and evaluated against the extent to which they make progress on these challenges, themselves the outcome of discursive, inclusive workshops.

This brings us to the second test for the distinctiveness framework. Will it enable us to establish the impact of this structural fund on peace-building and conflict in Northern Ireland? In its current form the answer to this question has to be 'no', for a number of reasons. Without independent conflict analysis, a 'peace-building impact' has not been closely defined. Furthermore, even working with the current framework and accepting the assumptions that underlie the criteria, the current evaluation framework will not establish whether or not the legacies and opportunities as defined by the programme have been addressed and taken. At best, with a greater emphasis on well-designed, micro-level

evaluations, implementing bodies may succeed in establishing the impact of individual measures on addressing legacies, taking opportunities and promoting reconciliation. At worst, the current evaluation system, with its focus on targeting, will be used to demonstrate the peace-building impact of the programme.

Finally, on the second weakness of PCIA, has the framework resulted in a top–down programme which limits local input? While the potential for the assessment and evaluation component to discourage local input has been highlighted, the interviews revealed some space for input that was mostly created by implementing bodies. That implementing bodies are all local may have helped to prevent the programme from becoming an overly top–down, prescriptive programme. Implementing bodies and the managing authority do hold participative consultations with local groups, but they frequently focus on operational, programmatic and financial issues at the expense of identifying the challenges to peace-building. More consultations that focus directly on identifying ongoing challenges for peace-building would strengthen the peace-building framework of the programme: first, by creating a formal conflict analysis that is highly informed by local actors; second, the analysis could be used to develop benchmarks against which progress towards these peace-building objectives can be evaluated.

Notes

1. From 1969 a low-level, violent conflict ensued in Northern Ireland exacerbating existing divisions in society between nationalists (who generally seek to unite Northern Ireland with the Republic of Ireland) and unionists (who wish to maintain Northern Ireland's position within the United Kingdom). Ceasefires by paramilitary groups (Provisional IRA, Ulster Volunteer Force [UVF], Ulster Democratic Association [UDA]) in 1994 were followed by the successful negotiation of the Belfast Agreement between the British and Irish governments and the Northern Irish parties in 1998.
2. For further information see Lynch, 2004.
3. The Belfast Agreement (1998) endorses the principle of consent: the Republic of Ireland gave up its territorial claim over Northern Ireland, which will remain part of the United Kingdom unless a majority of its citizens decide otherwise in a referendum (which can be called for by any parties but must be legislated for by the Secretary of State). In return, parties agreed to set up a number of cross-border (north–south) bodies with executive functions which are accountable to the Northern Ireland Assembly and to the Irish government.
4. These challenges were concluded following a series of three workshops involving representatives from over 10 peace-building/civil society organizations in Northern Ireland and Ireland as part of the Role of Civil Society Organisations in the Prevention of Conflict, 2004 (see ECCP, 2004).
5. Each priority is divided into between three and seven measures. The European Social Fund (ESF) funds some measures and the European Regional Development Fund others. This adds some complication to the monitoring system. Monitoring the European Social Fund requires additional data on individual beneficiaries.

6. The 'distinctiveness criteria' is a generic term for the distinctive and reconciliation criteria.
7. Measure 5.3 funds 54 projects in total; Measure 5.1 funds 80 in total (of which 10 are small business plans). This leaves approximately 70 projects.
8. Co-operation Ireland is the Implementing Body for Measure 5.1. ADM-CPA, CFNI and Co-operation Ireland are part of a Cross-Border Consortium jointly responsible for implementing Measure 5.3.
9. For example, see the Department of Enterprise, Trade and Investment, 2002. Applications Guidance Pack: Priority Measure 1A: Business Competitiveness and Development. Co-operation Ireland, 2003. The Distinctiveness Criteria for Applicants, Co-operation Ireland, 2002. Guidance Pack Measure 5.1: Cross-border Economic Development Opportunities.
10. Thirty out of 100 points are allocated to the distinctiveness and reconciliation criteria. Applicants must achieve a minimum of 16/30 in this section to pass screening.
11. Most projects, except those under Small Grants Programmes, are allocated over £100,000 STG (far more than the average grant in the PEACE I 1994–9 Programme). Average evaluation costs are £3,000 STG or 5,000 Euros.
12. This has been attributed to a perception amongst the Protestant community that this was not necessary 1920–1970, while the state was essentially 'Protestant'. The tradition of self-help groups was more prominent amongst nationalists throughout this period and during the Troubles. The Catholic community is perceived to be better at applying for grants to support this type of work and some attribute this to traditional Protestant emphasis on the 'individual'.
13. The proposals followed a short consultation period. The Peace II Extension Period will be committed in 2005 and 2006 and spent up until 2008. The proposals were quite responsive to recently published action research, for example by Brian Harvey (2003) and ADM-CPA, Co-operation Ireland and CFNI (2003).
14. The reconciliation score will increase from 6 to 20 percent and the score available for legacy and opportunity (20%) is no longer further divided into separate scores for area, groups or sector (see SEUPB, 2004: 9).

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