



# COMPRENDRE



## RURAL AREAS AND RURAL POLICY IN EUROPE

Comparative approach to five countries: Germany, Spain, Estonia, Ireland and Poland



**Summary** 











In this report, we present the primary results of the study Rural Areas and Rural Policy in Europe. This European benchmark, at once a sociological, political and geographic study, reveals how public policies in support of rural areas in France, Germany, Spain, Estonia, Ireland and Poland have evolved. This study investigates the flows, and occasional controversies, that affect rural areas by widening the scope to the European level. In so doing, this research provides a wider range of possibilities for a collective understanding of the future of these areas.

This study was commissioned by the ANCT and funded by the National Rural Network. It was conducted in 2023 by Coopérative Acadie, selected after a call for tenders and procurement contract.

The entire study was coordinated by Patricia Andriot (ANCT) and Marie Laurent (ANCT).

This study was co-funded by the European Agricultural Fund for Rural Development (EAFRD). The support provided by the European Commission for this report does not in any way constitute an endorsement of its content, which reflects only the authors' point of view; the Commission may not be held liable for any use of the information contained herein.

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Legal Registration: January 2024 ISBN: 978-2-492484-61-2

The European Structural Funds are important for regional cohesion in France. The National Agency for Territorial Cohesion coordinates ERDF and ESF funding, and also works with the EAFRD (European Agricultural Fund for Rural Development) as co-director of the National Rural Network alongside the Ministry of Agriculture and Food Sovereignty and the Regions of France. In addition, since 2017, the French government has developed a proactive policy for rural areas with a rural agenda, followed by a new programme launched in 2023: Rural France.

Understanding how these funds interact and the roles that they play, particularly that of the EAFRD, in national rural development issues, and observing other countries' practices in policies for rural and mountainous areas are therefore, naturally, some of our primary concerns.

With the help of the National Rural Network, the agency has therefore decided to conduct research in order to:

- assess and demonstrate how European funds contribute to rural and mountainous areas. In particular, we seek to highlight the EAFRD's support of measures that contribute to advancing the Rural Agenda,
- identify how French and European public policies address issues relating to development in rural and mountainous areas.

The results of these studies are published in three reports<sup>1</sup> and confirm the structuring, and in some cases determining, nature of European funds in France, as well as in the other countries studied, in terms of rural development.

Beyond the different histories and trajectories of each of the countries studied, this research highlights common issues: a widely observed feeling that rural areas have been neglected, public policies that are being developed to support rural and mountainous areas as they face climate change, a shared resurgence of initiatives that begin in these regions, as well as the role of engineering.

These 3 reports on how the EAFRD is used to facilitate rural development and what kind of support is provided for adapting to climate change in the countries studied all highlight the key role of engineering in meeting these new challenges. These studies confirm how important the agency, its programmes and adaptive engineering are, as well as the role of engineering in better use of European funds.

Stanislas Bourron
Director general of
the national agency for territorial cohesion

Note

<sup>&#</sup>x27;This report, Rural Areas and Rural Policy in Europe, as well as Comparative Views of European Funds and the French Rural Agenda and Climate Change in the Mountains: Meeting the Challenges of Adapting to Climate Change in Water and Tourism Management (available on the ANCT website https://agence-cohesion-territoires.gouv.fr/)

## 1. INTRODUCTION: COMPARING RURAL AREAS AND POLICIES

In light of France's review of its rural policy—through zoning revision and implementation of a new rural development programme—the ANCT sought to provide a comparative analysis of five European countries. After some discussion, the decision was made to examine the cases of Germany, Spain, Estonia, Poland and Ireland. This selection was based both on practicality, due to the relative ease of access to sources and contacts, and on methodology, given that this sample covers a wide variety of situations, rurality trends and rural policies in Europe.

These countries differ in terms of size; the influence and role of rural areas in their national economy and culture; their mode of governance, their European Union membership; and the existence or absence of specific national policies, referring to those that are both distinct from agricultural policies in the strict sense of the term and from measures carried out under the common agricultural policy. While this comparative study does not examine the case of France specifically, it does offer an implicit review of some aspects of its rurality and rural development policy.

The comparative study is based on an analysis of the scientific literature and public reports available either in the local language or in English. This analysis was supplemented by an average of four interviews per country to provide a "cross section" of public policy players, and rurality and rural policy experts.

The comparative study led to four conclusions:

- The nature and meaning of rural policies are diverse and relate systematically to national issues. "Rurality" is a term that covers widely varying meanings from one country to the next, often connoting specific policy issues in each country.
- European policy plays an important role in all the countries, as this constitutes the foundation of their rural policies, whether these be almost exclusively agricultural or incorporating a component of territorial rural development focused on diversifying rural economies.
- The countries share common traits in their aim to make rural areas "attractive" so as to tap into strategic resources, namely, public money, private funds and an active population.

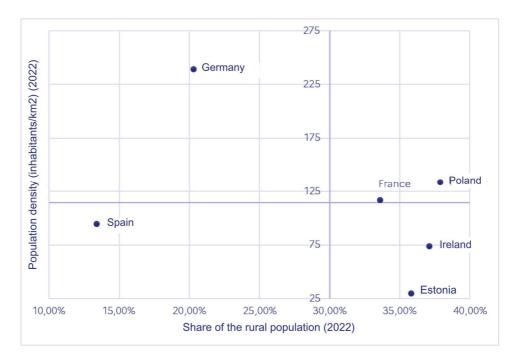
Questions are mounting in the five countries surrounding the role and functions of rural areas in national and European strategies for the ecological and energy transition.

### 2. DIVERSE RANGE OF SITUATIONS **AND ISSUES IN RURAL AREAS**

#### **INFLUENCE AND TRENDS OF RURALITY IN THE** FIVE COUNTRIES

In addition to the diverse types of rurality specific to each country, one striking observation is that rural areas differ between countries in terms of their influence and related issues.

Position of six countries according to population density and rural population (2022)



A comparison of rural populations and population density reveals situations of rurality that vary widely between the countries. Ireland and Estonia have low population densities overall, but a high rural population rate; Spain, which has the lowest rural population, is also the country whose rural population has the least influence; Germany is a country with a low rural population rate but high population density overall; and Poland and France each have medium population densities and a significant rural population relative to the sample.

The rural areas in the five countries do not follow the same trends. Ireland is the only country with a growing demographic across all its rural territories, whereas 60% of the municipalities in Spain are in demographic decline or have even become deserted. Estonia, after seeing a sharp fall in its agricultural population, is currently undergoing a degree of rural revival due to the development of secondary residences, but also due to rampant suburbanisation. Poland's rural areas are becoming rapidly depopulated, particularly in the east, despite government efforts to protect rural smallholdings. In Germany, most of the countryside is densely populated and attractive, excluding certain areas of in the east and north (Bavarian Forest and Mecklenburg-Western Pomerania).

## RURAL AREAS IN THE NATIONAL POLICY AGENDA

In the majority of the countries, rural areas have emerged in national political debate and are included on political agendas. In all the countries except Ireland and Estonia, rural areas display specific electoral preferences. For instance, rural electors in Germany for several years now have shown a growing preference for the anti-European party, AfD. In Poland, there is a clear division in voting between the "liberal" preferences expressed by urban electors and the well-established "populist" preferences of rural zones. In Spain, in response to a feeling of abandonment and the reality of desertification, ruralist parties have emerged in recent years, sometimes managing to reach representation at the national level. These "rural" political preferences do not have the same effects across the board. In Germany, the AfD vote is interpreted as one of an anti-establishment, populist protest, similar to the National Rally (Rassemblement National) vote in France. In Spain, ruralist party manifestos are not explicitly anti-establishment, but call for specific treatment for rural zones, aiming to curb or even reverse the drastic population decline. In Poland, on the other hand, the rural vote in favour of the PiS is legitimist, given that it supports the ruling government.

There are a variety of political consequences linked to these electoral behaviours. In Germany, debate has been rekindled on the effectiveness of the objective of "equivalence of living conditions" regardless of living environment. Meanwhile, in Spain, despite the creation of an office to address demographic challenges, a sense of confusion prevails in the face of the scale of the task. How can the trend be reversed given this phenomenon of desertification of such magnitude? In Poland, governments are wavering between an unfinished agricultural modernisation policy and the concern to maintain the size of the farming population. In Ireland, where the electoral divide is not as pronounced, the country's recent rural renewal has been fuelling a debate on spatial justice since the mid-2010s.

In practice, governments are caught between two imperatives. The first concerns rural development that remains poorly defined, while the other consists of "calming the dissatisfied" in an aim to limit the spread of protest voting and of political parties deemed as threats to liberal democracy.

# 3. THE IMPORTANCE OF EUROPEAN POLICY

Although the five countries are diverse, they are all members of the European Union. EU membership is a determining factor in shaping agricultural policy and rural development policy. Depending on when they joined the EU, the five countries have undergone more or less the same phases, but the consequences of these phases differ greatly from one country to the next.

#### **RURALITY EQUALS AGRICULTURE**

The first phase undertaken by all the countries is that of the modernisation of agricultural policy, which can be described as productivist. Rural policy is determined entirely by this objective. Its main principles are well known: support for agriculture (production and development), investment in equipment and technology; growth in productivity; development of a technical and scientific ecosystem around the production system; development of an agribusiness sector and growth of agro-industrial firms; growth in agricultural productivity, a smaller number of farmers and increased average size of farms, etc. In this phase, rural areas are broadly formatted to serve as support for productive agriculture.

Germany is the most successful case in our sample (as the greatest agricultural power in the continent along with France), having a small number of farmers and very high productivity rate per work unit. While Spain appears less productive, it has experienced record growth in its agricultural production since joining the EU, increasingly specialising in several fields, which adversely affects less profitable rural areas. Ireland, a long-standing member state (since 1973), has undergone limited modernisation, which is partly related to the importance of livestock farming. The country's production and productivity remain modest. Estonia, following the end of the communist regime and even before joining the EU, underwent a certain shock therapy, which initially caused a dramatic drop in its agricultural production. Then, after the country had joined the Union, this drop was followed by rapid growth in productivity, now on a par with that of Spain. Poland remains the "straggler" in this race, experiencing slower agricultural modernisation, and maintaining a significant number of smallholdings (10 ha on average nationwide) and very low productivity.

#### **EMERGING RURAL DEVELOPMENT POLICIES**

In some of the countries, such as Germany, the emergence of autonomous rural policies is the result of spontaneous, "bottom-up" movements. It is also conceivable that the idea of rural development is an indirect consequence of agricultural modernisation. The diminishing agricultural population and growing productivity have given rise, almost automatically, to social and economic diversity in rural areas, where agriculture is no longer the dominant force, whether in terms of demographics or in terms of value produced. Other factors may be conducive to the emergence of non-agricultural interpretations of rurality, such as urban development and spread, which is "suburbanising" a growing number of rural municipalities; and the development of mountain and coastal tourism, as well as agritourism, which contributes to the specialisation of certain rural municipalities. Lastly, the countries are also noticing, at varying rates, that certain rural zones "lag behind" the level of development on the national scale, as reflected by indicators of revenue, level of study or business activity being lower than national averages.

In other words, rural policies emerge paradoxically out of the success of common agricultural policy and its inability to ensure rural development that is consistent with the transformations occurring in the different countries. The European Union plays a decisive role again here since national rural development policies are drafted almost across the board at the same pace as LEADER programmes, depending on when each country joined the EU. For those that joined the EU more recently (i.e. Estonia and Poland), rural development policy has amounted to the implementation

of LEADER programmes, while the others (i.e. Ireland, Germany and Spain) have set up "national" rural development policies as an addition to, or in tandem with, LEADER programmes.

Ireland, for instance, has adopted a comprehensive strategy for rural areas entitled "Our Rural Future 2020-2026", promoting their contribution to the country's economic development and to its overall quality of life. This programme has three main focuses: digital connectivity for the countryside, support for creating more economic and social activity, and help with the revitalisation/regeneration of villages and towns. Spain, in parallel with the LEADER programmes led by autonomous communities, has created a national programme to tackle its demographic challenge, targeting the rural territories most affected by the depopulation trend. In 2016, Germany designed and began implementing a federal programme entitled "BULE" (for development and value creation in rural areas), led directly by the Federal Ministry of Food and Agriculture. It aims to take inspiration from "model regions" to test out new practices and prototypes, which can then be presented to other rural areas.

# WHAT MODELS ARE THERE FOR RURAL AREAS FOR THE ECOLOGICAL AND ENERGY TRANSITION?

More recently and, likely, once more under the pressure of the European Green Deal, rural policies have been confronted with a new wave of questions. These questions stem from the observation that sparsely populated rural areas are becoming fertile ground for "backing" investments for the ecological and energy transition. Wide-open, sparsely populated areas are increasingly sought after by renewable energy operators, while agriculture is being enlisted both for food sovereignty purposes and for the production of biogas, wood fuel etc. Simultaneously, rural areas are consolidating their logistical role as locations near to major transport routes, while at the same time being dedicated to natural reserves and ecosystem conservation. As such, rural areas find themselves subject to several demands that are as urgent as they are contradictory: space for energy and agriculture, space for biodiversity reserves, space for logistics, and space for residential and tourist activity since the rural territory must be inhabited.

These tensions, which have always existed to some degree, are now taking on significant proportions and will likely lead to a third phase in rural policy, wherein questions of land sharing and value sharing become central.

## 4. EACH COUNTRY IN ITS QUEST FOR "ATTRACTIVE" RURAL AREAS

All the territories share three main areas of action: attracting public capital, attracting private capital and attracting "people".

#### ATTRACTING PUBLIC MONEY

The first area is concerned with attracting public funding to rural territories. All European countries have powerful welfare state systems in place for education, healthcare and old-age support. Many economists have studied the invisible circulation of wealth represented by these welfare state mechanisms. Their findings are consistent among all European countries: these mechanisms carry out a "positive" role of redistribution toward "disadvantaged" territories, especially rural ones. Indeed, these mechanisms are based almost across the board on the principle of allocating funding in line with the contributive capacities of households and businesses. As such, since service provision (in education, healthcare, culture etc.) is relatively uniform across the territories, these systems extract "more" funds from "richer" areas to ensure a relatively "egalitarian" distribution. It is therefore not entirely coincidental that certain affluent regions of Europe (such as northern Italy, Catalonia, Flanders etc.) often call for the regionalisation of welfare state mechanisms, as they are aware that a nationwide tiered system requires them to pay out more than they receive. Although this "equalising" mechanism is well known, all territories seek at the very least to keep their place in the distribution of public funding, if not to gain a better one.

Many rural territories express a worry that their place in the distribution of public funds is tending to decline. This worry is fuelled by the recent reorganisations of many public services. All over Europe, local health institutions (maternity care, clinics etc.) are being downsized. The extensive technologisation of medicine and desire for a more collective practice are driving services to become concentrated together. The same is true of secondary and higher education institutions, where, following strong decentralisation in the 1990s, the tendency is now to reinforce large teaching clusters due to the desire among pupils and students for a wider selection of courses and options, and among teaching institutions for more peer exchanges. These same mergers are also occurring in the justice system, the police and many other services. The paradox is that residents are both calling for and complaining about such mergers due to the fact that they offer more wellrounded services and a smoother professional practice, but inexorably push services farther away. In Aragon, a school can be opened with five pupils in nursery and primary combined. This is certainly one of the lowest enrolment thresholds in Europe and can be attributed to very low population density in the Aragonese countryside. In our exchanges, some elected officials explained that they had chosen not to open a school with only five pupils due to fears of them losing out on the experience of being in a diverse peer group.

In Ireland and Spain, public expenditure shrank drastically in the early 2010s following the 2008 financial crisis and its repercussions on public debt financing. This budgetary situation exacerbated rivalries in terms of accessing declining resources. In Spain, the share of public expenditure went from 48.5% of GDP in 2012 to 41.3% in 2017. Austerity was even more severe in Ireland, where public expenditure rate peaked at 64.9% of the GDP in 2010 (under the combined effect of a shrinking GDP and increased interest rates) before falling to 24.3% in 2019. However, the ratios of public expenditure to GDP in Germany, France and Poland were much more stable throughout the 2010s.

In all European countries, there is a desire among rural areas to negotiate a better place in the social redistribution system. In each country, an "upper" chamber is the place where "territories" are represented more so than "residents". It is often in these upper chambers that the concerns of the rural world resonate most strongly. But, beyond this institutional framework, "regionalist" parties may also be adding to this territorial concern. Among the countries in our study, this is particularly evident in Spain, where "localist" parties, such as Teruel Existe, have emerged in addition to the now-conventional parties that represent the interests of regions outside Castile. This is not so much the case in Germany, as Bavaria is the only area with a "regional" party, namely, the Bavarian branch of the Christian Democratic Union.

Such parties are near-inexistent in Poland, Ireland and France. The "local" and, particularly, rural world in France voices its concerns through associations representing locally elected officials, such as the Association of Rural Mayors of France (Association des maires ruraux de France).

In light of these demands for territorially "fair" redistribution of public subsidies, there are strong calls for more precise information on the territories where these subsidies are used.

In Spain, efforts have been made to ascertain precisely how the flow of public money is balanced between regions. This is linked to very strong pressures from regionalists who worry that "Madrid" may be taking "too much" away from them. This information-gathering exercise is worthwhile, but comes up against significant methodological obstacles that make it highly risky. For example, is the university education of a young adult a "rural" or "urban" expense if the student lives in the city while their parents live and work from home in the countryside? As we can see, this mechanism can lead to a logical impasse once we consider the fact that people move around, and fortunately so! Should the location of the public expense be defined as the place where people "consume" the public service, or where they work or "use" what they have received as a result of social redistribution? Here, the focus is narrower, but the final image is not much sharper.

To avoid this trap of a tempting, yet rather illusory, "costed" estimate, another approach has been proposed that involves testing the "rural" effect of public policy (also known as rural proofing). There is a very strong demand for this. In Germany, it has led to the establishment of a commission for the equivalence of living conditions. In Ireland, a recent report proposes to extend this rural impact analysis. The objective of such an approach is to assess all public policies in light of their varying impacts between rural and urban zones, then to offer proposals on how to reduce potentially negative impacts on rural zones. In Ireland, various public policies have been examined for their rural impact analysis. The report also recommends that a reverse report be drawn up and not only to measure the negative impacts, but also identify the potential advantages of rurality in reaching certain objectives. This measure is not deemed sufficient to stand as a "rural policy" in and of itself, but it allows for rurality to be taken into account in each sectoral policy.

In all European countries, questions have been raised regarding this "veil of ignorance" over the territorial effects of social redistribution. Should it be lifted? How might this be done? What would be the effects? It is certainly an emerging debate within rural development policy.

#### ATTRACTING PRIVATE MONEY

Territories also strive to attract private money, particularly from businesses. To this end, the tools are largely the same in all the countries. The strategy is to capitalise on transport and communications infrastructure, education quality, and overall quality of life.

Targeted financial instruments have also been set up, including, in particular, direct or indirect aid through reductions in social security contributions or tax. France has adopted this approach, notably through schemes for rural revitalisation zones (ZRRs). Created in 1995, these aim to assist the development of rural territories, primarily by virtue of tax-based and social measures (particularly through temporary reductions in corporation tax). Specific measures to assist economic development also apply. The aim is to focus state aid measures toward benefiting job-creating businesses in rural zones that have the lowest populations, and which are most affected by demographic and economic decline. The precise geographic definition of these zones is often disputed since no local authority wishes to be "excluded" from this scheme once it has enjoyed its benefits. In Spain, the state has planned to lower social security charges for businesses located in "empty" territories. Very few scientific studies are available to show precisely how these fiscal policies affect the investment attractiveness of rural territories.

It should be noted that some countries may be considered as "ZRRs" at the national level. According to the OECD, in 2019, effective corporation tax rates—meaning those that were actually paid—were set at 13% in Ireland, 16% in Poland, 17% in Estonia, 25% in Spain, 27% in Germany and 30% in France. The calculation methods used have allowed rates to be significantly reduced for multinational companies, especially in Ireland and Estonia.

#### REINVESTING IN TOWNS AND VILLAGES

In the six countries studied, rural development was also a "spatial planning-based" or "urbanistic" component. Two elements are combined in this respect: limiting land take to conserve agricultural areas and preserve biodiversity on the one hand, and revitalising villages and towns to maintain their attractiveness on the other. In other words, this means both stepping on the brake—to curb the urban sprawl—and on the accelerator—to concentrate investments on existing built-up areas. Land take exists in very diverse forms across the countrysides of Europe and relates to rural heritage, notably between bocage land and dispersed settlements. In recent years, the six countries in our study have differed in their land take rate, which has been moderate in Germany and Spain, significant in Ireland and France, and rapid in Poland and Estonia.

In Poland, 545,000 ha were urbanised between 2004 and 2012. This situation can be explained by the country's "catch-up" after the massive increase in small-sized and collective housing during the communist era. The years that followed were marked by a strong appetite for spacious, individual housing. Moreover, there is little incentive for municipalities to draw up urban planning documents since Polish law requires them to compensate property owners for any loss of value due to urban planning easements. They are also required to build nearby road infrastructure before constructing any new urban developments. It is less costly for municipalities to implement urban planning on an "as-and-when" basis as opposed to taking an overall approach. All these aspects combine to encourage a scattered, uncoordinated style of urban development. Meanwhile, in Estonia, there is a large proportion of vacant housing in rural zones. Almost 25% of homes were officially vacant in 2018, one of the highest percentages worldwide. This situation can be explained by a combination of the budget difficulties faced by municipalities, their reluctance to draw up urban planning documents and their limited power to intervene in real estate. Between 2000 and 2014, the country's built surface increased by 14% while its population decreased by 5%.

In France and Ireland, the dynamics of sprawl and dispersion are maintained by each country's low overall population density, as well as by policies for residential attractiveness adopted by many rural municipalities, particularly those within driving distance of cities. Both countries have launched relatively similar revitalisation programmes to increase the attractiveness of town and village centres (France's Towns of Tomorrow (Petites villes de demain) and Villages of the Future (Villages d'avenir), and Ireland's Town and Village Renewal Scheme and Town Centre First). The key components of these schemes are aid for rehabilitating buildings and reusing derelict plots, incentives for business revitalisation through redeveloping public spaces, and limiting urban sprawl. This process is extremely complicated and divisive in both countries, however, as it comes in the wake of decades of incentives pushing in the opposite direction.

In Germany and Spain, on the other hand, these policies are more robust and facilitated by different residential dynamics. Suburban or rural houses are a much less popular choice in Spain, while Germany's high population densities led very early on to efforts to limit "dedensification". Moreover, policies to support "reinvestment" in villages and towns are stronger and have been in place for longer. In Germany, these programmes are very often financed primarily by the states (Länder) and there is also a federal programme known as Dorfneuerung, which backs regional initiatives.

#### CONCLUSION

Comparing national policy for rural areas is all the more compelling when we consider how, behind the question of rurality, each country poses different challenges. On the one hand is the wide variety in rural areas in terms of density, economic diversification, cultural recognition etc.; on the other is the difference in their main policy challenges, such as the ecological transition, evolution of public services, city-countryside relationships, national unity, etc. This diversity of concerns is, to some extent, masked by the relative similarity of the tools put in place for the development of rural areas. On the face of it, the countries appear alike in many ways, particularly as a result of the implementation of community-based methods.

Across the board, rural policy is now being radically re-examined. We are clearly at a turning point in this respect. We believe that the challenge of the ecological transition is responsible for this moment of doubt regarding the future of rural policy in Europe. Indeed, residents in rural zones know that the ecological transition will call into question many aspects of their lifestyles, notably, the massive reliance on cars, but also certain practices in hunting, heating etc. Business activities in rural zones are particularly affected by ecological issues, including agriculture, of course, as well as forestry and many other industries. Yet, it is in rural areas that the majority of green industries will be developed, particularly renewable energy production. In summary, both rural society and rural economy will undergo profound transformation in the coming decade. In every country in Europe, following on from the European Union Green Deal, there are ecological planning efforts to identify expectations for various economic sectors (building, energy, transport etc.). However, no country has carried out studies to offer any real advancement on proposing ways to territorialise the ecological transition. We had hoped to find a few countries that were ahead of France in this regard, but it is evident that no country has ventured into territorialisation as of yet.

This absence of visibility regarding the territorial effects of the ecological transition is worrying. Local players in rural development feel that they are missing out on major sectoral transitions. For example, evolutions in agriculture depend much more on the relationships of this sector with upstream industries—seed producers, agricultural machinery producers etc.—and downstream industries—food processing and retail—than on the actions of elected officials and other local players. Moreover, the current tools of local development are not being tailored to meet these ecological challenges. While the 1990s and 2000s saw the emergence of innovative, bottomup solutions for advancing ecological policy (territorial food plans, Agenda 21, local energy initiatives etc.), the most profound transformations today are largely instigated by sectoral strategies from the EU or its member states. In short, in matters of the ecological transition, the bottom-up (sectoral) and top-down (territorial) do not meet. This is all the more apparent in the countryside.

The challenge is immense in scale. It is political in nature because it requires the confirmation of territorially means-tested contributions. Yet, in all European countries, the roles of the state and local authorities are still divided such that the latter can express its own path, while the state guarantees equality. It would be a major shift to restore states' capacity to divide (in consultation with local authorities) projects according to territory. However, the challenge is also a technological and scientific one, as we are a long way from finding the stable data and methods needed for a rigorous and open territorialisation of the ecological transition.

The European Union is setting out a new ambition with the «rural pact». Various countries are redefining their policies for rural areas, notably France with the transition from the « Rural Agenda » to the « France ruralités » plan. The National Agency for Territorial Cohesion (ANCT) intended to carry out a comparative study of national policies for rural areas. The ANCT commissioned the Acadie cooperative to carry out this study. The countries studied are Germany, Spain, Estonia, Ireland and Poland. While the instruments used to promote rural development are fairly similar throughout Europe, the objectives and expectations of the Member States rural policies differ widely. Everywhere, the ecological transition is calling these policies, their instruments and their objectives into question.

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