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**TO**  
**THE JOINT SECRETARIAT OF THE**  
**INTERREG -IPA BULGARIA – NORTH**  
**MACEDONIA 2014-2020 PROGRAMME**

**COPY**  
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**DIRECTOR OF DIRECTORATE TCM**  
**MINISTRY OF REGIONAL DEVELOPMENT**  
**AND PUBLIC WORKS, REPUBLIC OF**  
**BULGARIA**

***Subject:*** *Joint Working Group for preparation of CBC Programme between Republic of Bulgaria- Republic of North Macedonia 2021-2027-written consultation for approval of the Programme's Intervention Logic.*

**DEAR LADIES AND GENTLEMEN,**

On behalf of the National Association of Municipalities in the Republic of Bulgaria, below are some comments and observations on the Programme's Intervention Logic Draft, provided via e-mail on September 9th to the Joint Working Group for preparation of CBC Programme between Republic of Bulgaria- Republic of North Macedonia 2021-2027.

The detailed theoretical justifications and explanations for the choice of the political and specific objectives to which the future program is proposed to contribute, should be positively assessed. With regard to them, the following principled and practical comments and remarks, should be observed:

1. Contribution of the future program to PO 1: From one side, SMEs undoubtedly have significant role in the competitiveness of the cross-border region, and hence in general for its integrated territorial development. From the other point of view, as stated in the draft document, the future program is expected to have a budget smaller than the modest one of EUR 19.5 million of the present CBC program. In order to ensure the real integrated territorial development of the border region, which cannot take place without business and to better focus the future program funds, it would be more appropriate to plan SMEs support under PO 5, if the decision to contribute to it is taken;