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TO
THE JOINT SECRETARIAT OF THE
INTERREG -IPA BULGARIA – TURKEY 2014-
2020 PROGRAMME

COPY
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BULGARIA

Subject: *Meeting of the Joint Working Group for preparation of CBC Programme between Republic of Bulgaria and Republic of Turkey 2021-2027.*

DEAR LADIES AND GENTLEMEN,

On behalf of the National Association of Municipalities in the Republic of Bulgaria, below are some comments and observations on documents, provided via e-mail on September 14th to the Joint Working Group for preparation of CBC Programme between Republic of Bulgaria- Republic of Turkey 2021-2027, subject to comments and approval on the Group meeting scheduled for the 24th of September.

I. Territorial Analysis of the Bulgarian- Turkey Cross border Area:

1. Objectively and in exhaustive way the main problems in the different sectors of the socio-economic development of the border region are described. The outlined challenges to the region in the context of the European Green Deal and the Covid-19 pandemic, are also commendable;

2. However, it must be stressed, that the recommendations for the areas of interventions and the ways for their implementation under the future program, presented in the final part, do not correspond to the sections of the territorial and SWOT analysis. Examples in this regard are:

- The recommended investments for micro and small enterprises support. The reason for this, as stated is to address the significantly economic and social effects on them

from the health crisis of COVID-19. At the same time, the analysis does not provide information on specific, including supported by quantitative data, negative effects on enterprises by sector, as a result of the pandemic. In this sense, the proposed intervention should be further justified by expanding the analytical part of the document;

- The proposed orientation of the program towards PO 5 "Europe closer to the citizens", through investments based on a common strategy for territorial development. In the analysis, as well as in the conclusion part, there are no grounds for this proposal, including recommendations on integrated development types for the border area. Here, too, the proposed intervention should be further and in detail justified through dedicated new section on governance and community development in the analysis. This new section should be presented and analyzed information about the lessons learned from the previous 2 programming periods (interest inwards the program, number of submitted and number of funded projects); the administrative structure of the region; the competencies of the separate NUTS management levels; cooperation between public institutions, NGOs and the business sector; potential models for territorial cooperation (urban, ITI, through CLLD, etc.); results of studies and consultations with stakeholders and potential beneficiaries, etc. Only after supplementing the analytical part with this information and on the basis of solid reasons, the proposed recommendation could be made.

II. Program Intervention Logic:

The detailed theoretical justifications and explanations for the choice of the political and specific objectives to which the future program is proposed to contribute, even being almost identical with the similar document concerning the future CBC Program with North Macedonia, should be positively assessed. With regard to them, the following principled and practical comments and remarks, should be observed:

1. In order to be justified the proposed contributions of the future program to POs' 1 and 5, the Territorial Analysis of the Border Region between Bulgaria and Turkey, should be

expanded, including a "Governance" section, to which reference is made in this document, although such is missing;

2. 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 29.6 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;

3. Contribution of the future program to PO 5: The proposed objective is reasonable and in-line with the logic of the new Bulgarian approach for regional development, to be applied in the next programming period 2021-2027. However, taking into account:

- The insufficient experience in cross-border integrated territorial development at European level, especially at the Union external borders;
- The on-going structuring of the approach in Bulgaria, showing the process is a time-consuming;
- The lack of readiness of the integrated territorial strategy, including any clarity about the territorial structure responsible for it, the time needed for its development and the provision of resources for this;
- The necessity of coordination of several territorial strategies on the Bulgarian territory of the border region, which also includes 2 NUTS 2 regions, at different NUTS levels for: integrated urban development (Burgas municipality); integrated territorial development (municipalities: Yambol, Haskovo, Dimitrovgrad, Harmanli, Svilengrad, Karnobat, Aytos, ect.); possible similar territorial strategy for the border region with Greece (Haskovo district within);
- The small-scale financial resources for the implementation of the integrated territorial approach - according to preliminary calculations below EUR 14 million, incommensurable with the additional administrative burden accompanying the structuring of the territorial approach;
- The risk of overall delay in the start of the new program, due to the time needed for the Strategy development in the conditions of the $n + 2$ rule,

it is necessary further and thoroughly consider and justify the contribution of the future program to the chosen political objective 5. It also should be noted, that the Letters of support for the Bulgarian applicants of the future program, from the relevant Regional Development Councils, are sufficient guarantee for the compliance of their projects with the relevant territorial

strategies, the basis for the implementation of integrated territorial development in Bulgaria. As the proposed integrated development approach has an indisputable contribution to the territories, its implementation could be envisaged after sufficient experience at national level is on hand, post 2027.

In conclusion, in order to ensure the efficient use of the modest program resource, if the too risky decision to contribute to the PO 5 is taken, clear and not additional administrative burdening mechanism should be established for the implementation of its future interventions in coordination and complementarity with the pointed above territorial strategies, Bulgarian national programs for the next programming period 2021-2027, including the programs for cooperation with Greece and within the Black Sea Basin.

4. Contribution to the Interreg SO for a safer and more secure Europe: After clarifying the scope and especially the necessary budget of the interventions to strengthen the institutional and operational capacity of the police and other public authorities in the cross-border area, to improve their effectiveness and skills in managing migration, in view of the modest resources of the future Program, it would be appropriate to discuss potential support for them from the National Bulgarian Programs under the Internal Security Fund and the Border Management and Visa Instrument for the period 2021-2027.

We believe that further justifications and information on the comments and remarks posted, will be provided, in order to assist the JWG to take the most favourable and reasonable decision on the Programme's Intervention Logic.

With regards,


Silvia Georgieva
NAMRB Executive Director

