**REPORT**

**Mid-term Evaluation Report on the Progress in the Implementation of the Programmes of the EEA Financial Mechanism and the Norwegian Financial Mechanism 2014-2021**

**Contracting Authority: Administration of the Council of Ministers**

**Contractor: Econometrica Ltd**

**Sofia**

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# **Introduction**

The mid-term evaluation of the progress in the implementation of the EEA FM and NFM 2014-2021 programmes is carried out on the basis of Chapter 10. Evaluations Regulation on the implementation of the European Economic Area (EEA) Financial Mechanism 2014-2021.

# Goals of the Mid-Term Evaluation

**The overall goal** of the “Mid-term evaluation of the progress in the implementation of the programmes of the EEA FM and NFM 2014-2021” is to carry out an interim evaluation of the implementation of the programmes financed under the EEA FM and NFM 2014-2021. The elaboration of the evaluation is in accordance to I.1 of the Technical Specification (TS). The evaluation will contribute to improving the appropriateness, efficiency and effectiveness in their implementation, through:

* + - providing all stakeholders involved in the management, monitoring and control of the programmes with an independent and objective analysis of the facts and findings of their implementation;
		- analyzing the progress and the probability of achieving or not achieving the goals and results set in the programmes;
		- providing, based on facts and findings, of recommendations to be used for taking action towards improvement of the quality of programme management and implementation.

**The specific objectives** of the evaluation are:

* To assess the progress in the implementation of the programmes since the signing of respective Programme Agreements by June 30, 2020, on the basis of separate analyses and evaluations of each of the programmes listed in I.1 of the TS. More specifically the listed programmes are subjected to analysis in terms of their objectives, results and the products that are expected to be realized from the implementation of financed interventions/projects;
* To evaluate the expediency of the application of the programmes under I.1 of the TS, which should be done on the basis of separate analyses and evaluations of each of the indicated programmes, taking into account their specific target groups and specific objectives;
* To evaluate the effectiveness and efficiency of the implementation of the programmes under I.1 of the TS, which should be based on separate analyses and evaluations of each of these programmes, considering their specific target groups and specific objectives;
* To evaluate the achieved results of the interventions under the programmes listed in I.1 of the TS at a general programme level, as well as the probability of achieving or the risk of not achieving the planned results under the individual programmes;
* To evaluate identified problems and good practices (strengths and weaknesses) in the implementation of the programmes under I.1 of the TS, as well as to formulate practical and useful recommendations aimed at overcoming the identified problems that may serve as a tool in the process of making informed management decisions.

The evaluation is based on the progress in the implementation of the programmes in the period from the signing of the Programme Agreements between the NFP and the EEA FM Office until June 30, 2020, and it assesses the possibility of achieving the pre-set goals and results within the implementation deadline of the projects – April 30, 2024.

The results of the implementation of the programmes under the Financial Mechanism of the European Economic Area and the Norwegian Financial Mechanism 2014-2021 will be presented to the following target groups of the mid-term evaluation:

* The Central Coordination Unit Directorate (the National Focal Point/NFP);
* Programme operators;
* Programme partners from donor countries (Donor project partners/DPPs) and international partner organizations;
* EEA FM Office;
* The Certifying Authority and the Audit Authority;
* Stakeholders and the general public.

# 1.2 Scope and Criteria of the Mid-Term Evaluation

The mid-term evaluation of the progress in the implementation of the programmes of the EEA FM and the NFM 2014-2021 analyzes the overall implementation of the programmes specified in I.1 of the TS. The evaluation covers the programmes, their respective specific/priority objectives and measures, including the signed contracts for pre-defined projects and/or open procedures. Recommendations for improving the management and implementation of the programmes have also been formulated.

Several main criteria were taken into account during the evaluation:

* + Appropriateness (relevance) – to what extent the objectives of the programmes and the interventions included in them correspond to the existing socio-economic needs, policies and priorities of the country, the needs and problems of the target groups to be addressed through the respective programmes;
	+ Еffectiveness – degree of actual or expected achievement of the goals and results determined at the programme level (achievement of the set indicators for result and product);
	+ Efficiency – to what extent the achieved results correspond to the costs incurred; whether the costs of achieving results are comparable to similar programmеs funded by other donors;
	+ Applicability of the assistance – analysis of the objectives of the programmе and their adequacy in relation to the changes in the social, economic and political aspect during the programming period.

The results, findings and recommendations of the evaluation can serve as a starting point for taking concrete actions to improve the quality, efficiency and coherence of the support provided by the EEA FM and the NFM 2014-2021. The activities for carrying out the mid-term evaluation are performed in compliance with the requirements of the current Community and national legislation and the legal framework of the of the EEA FM and the NFM 2014-2021, as well as in accordance with the requirements of the Contracting Authority.

The mid-term evaluation was carried out in accordance with the guidelines for the evaluation of the EEA FM and the NFM 2014-2021 as spelled out in the Results Guideline, published at: <https://eeagrants.org/resources/2014-2021-results-guideline>.

# 1.3 Main Research Questions of the Mid-Term Evaluation

In order to achieve the objectives of the mid-term evaluation of the EEA FM and the NFM 2014-2021, it provides answers to the following **key questions set out in the TS**:

1. To what extent are the priorities, the selected interventions and the applied approach (eligible activities, costs, beneficiaries, etc.) appropriate and correspond to the needs, problems and limitations of the target groups of each of the programmes under I.1 of the TS?
2. Is the amount of funds for the individual interventions appropriate and sufficient, given the identified needs of the target groups?
3. To what extent do interventions within the programmes under I.1 of the TS complement the support provided under other programmes and financial instruments (in particular ESIF funding) and other EU-funded programmes? What is the relationship and synergy between the programmes under I.1 of the TS and the measures implemented under other programmes (in particular ESIF funding) in order to achieve the national and pan-European goals for economic development and social cohesion?
4. Is the support provided under the programmes under I.1 of the TS concentrated on the most effective and efficient interventions in terms of the objectives of the two financial mechanisms, as well as the needs and priorities of Bulgaria in the programming period?
5. Have changes been made to the programmes, and if so, what are they related to:
* Changes in the context of policies and priorities in the specific programme area;
* Inexpediency of planned interventions;
* Other reason/s.
1. To what extent have the results, indicators and objectives at programme level been achieved or are expected to be achieved? Is there a risk of not achieving the pre-set results and planned values of the indicators and what factors (internal or external to the programmes) is this risk due to?
2. Do interventions really help to achieve the goals and identified needs of the programme?
3. Are the necessary resources (in terms of finance, time, administrative capacity, procedures, etc.) available to ensure the effective and efficient achievement of the set results, indicators and goals?
4. How appropriate and justified are the tools used to achieve the set goals and results?
5. What is the progress made (as of June 30, 2020) under each of these programmes in terms of the negotiation and implementation of measures, incl. in terms of the results achieved?
6. Are there any deviations or delays vis-a-vis the initial programme implementation schedule? What is the reason for this (internal and/or external factors for the programme) and what is the potential impact of this delay on the successful implementation and finalization of the interventions and the achievement of the pre-set results? Is there a realistic up-to-date plan for the implementation of the measures under the programme?
7. Have the Programme Operators (PO) identified a risk of delay in the implementation of time-dependent measures and interventions and how is this risk addressed?
8. What are the examples of good practices in the management and implementation of the programmes under I.1 of the TS?
9. What are the main conclusions in terms of: the design and programming of interventions, selection of project proposals, contracting, monitoring and reporting, financial control and payment, prevention systems, risk management systems, registration and reporting of irregularities, procedures on monitoring, evaluation and reporting on the implementation of the programme, information and communication measures, etc.?
10. To what extent are the objectives of ensuring a Roma focus met within the “Local Development, Poverty Reduction and Improved Inclusion of Vulnerable Groups”, “Cultural Entrepreneurship, Heritage and Cooperation” “Justice” and “Home Affairs” programmes? Is compliance with national policies provided in terms of how the territorial scope of implementation is chosen and how the measures are focused on the needs of the target group; whether the consultation process meets the needs of the schemes and the target group; to what extent is there complementarity and synergy with other projects and programmes, as well as upgrading of results related to the Roma focus on the EEA FM from the previous programming period (2009-2014)
* how is the experience of identical procedures at national level and/or foreign practices used in the implementation of integrated measures for local development and poverty reduction through education, employment and health care (including initiatives aimed at the health needs of vulnerable groups); how is the experience used in identical procedures at the national level, foreign practices;
* what type of monitoring is envisaged: reporting on the participation of the Roma in the implementation of activities or how this participation has contributed to a real change in terms of the impact of the projects and the programme.
1. What recommendations and specific proposals for improving the management and implementation of the programmes under the EEA FM and the NFM 2014-2021 can be made?
2. What are the main examples of good practices in terms of partnerships formed with donor organizations at the programme and project level and the recommendations for improvement?

# 1.4 Methodology of the Mid-Term Evaluation and Activities Undertaken

The mid-term evaluation was carried out in accordance with the guidelines for the evaluation of the EEA FM and the NFM 2014-2021 included in the Results Guideline (<https://eeagrants.org/resources/2014-2021-results-guideline>).

The sources of information used, and the methods of analysis and evaluation, are presented in Table 1.

**Table 1. Target groups, sources of information, methods**

|  |  |
| --- | --- |
| **Target groups / sources of information** | **Methods for collection and analysis of the information** |
| National Focal Point (NFP) | 1. Introductory meeting (discussion on the objectives, methods and results of the mid-term evaluation)
2. Online disussion
 |
| Programme Operators (POs) | Online in-depth group interview  |
| Donor Programme Partners (DPPs) | Online questionnaire  |
| Individual implemented projects (promoters, partners, experts) | Case-studies – online interviews with people working in the selected projects funded under the programme |
| Programme and projects documents | Desk research (document analysis) |

The introductory meeting with members of the NFP team was held on October 1, 2020 with the participation of:

* Dobrinka Krasteva, Head of the Monitoring and Analysis Department;
* Gergana Mitreva, *Local Development, Poverty Reduction and Improved Inclusion* Programme and the Roma focus as a horizontal theme;
* Adelina Vezenkova, *Culture*, *Interior* and *Justice* Programmes;
* Maya Stoyanova, horizontal issues related to the management, implementation and monitoring of the EEA FM and NFM;
* Daniela Tsoneva, *Environment* and *Energy* Programmes and contact person to Econometrica Ltd. under the contract for carrying out a Mid-Term Evaluation of the Progress in the Implementation of the EEA FM and NFM 2014-2021;

On October 29, 2020, an online meeting was held with members of the NFP team Dobrinka Krasteva; Adelina Vezenkova; Daniela Tsoneva; Gergana Mitreva and Maya Stoyanova

***Online meetings and interviews with representatives of the POs***

***Local Development, Poverty Reduction and Improved Involvement of Vulnerable Groups* Programme:** An in-depth online interview was conducted on November 30, 2020 with the participation of Tsvetana Gerdjikova (Director of the External European Programmes Directorate at the Ministry of Education and Science), Maria Vasileva-Valova (State expert) and Maria Teodorova (senior associate). Participants from Econometrica Ltd. were Andrey Nonchev and Alexander Stoyanov.

***Cultural Entrepreneurship, Heritage and Cooperation* Programme.** On December 4, 2020, an in-depth online interview was conducted with Pepa Gencheva, Programme Manager of the Programme. Participants from Econometrica Ltd. were Andrey Nonchev and Maria Bakalova.

***Home Affairs* Programme.** The in-depth interview was conducted on December 3, 2020 with participants from the Interior Ministry: Maya Petkova (Director of the International Projects Directorate), Komnya Indjova (Head of Monitoring, Verification and Payments), Krasimir Ushnev (head of department), representatives of Econometrica Ltd – Andrey Nonchev and Alexander Stoyanov.

***Justice* Programme.** The in-depth interview was conducted on December 10, 2020 with Veneta Stoilova from the Ministry of Justice and Andrey Nonchev and Alexander Stoyanov, representing Econometrica Ltd.

***Environmental Protection and Climate Change* Programme.** The in-depth interview was conducted on December 17, 2020 with participants from the Ministry of Environment and Water: Silvia Rangelova (Director of the Directorate for Coordination of European Union Affairs and International Cooperation), Dennitsa Nedeva (Head of the Department for Coordination of European Union Affairs) and Petar Markov. Representatives of Econometrica Ltd. were Alexander Stoyanov and Maria Bakalova.

***Renewable Energy, Energy Efficiency and Security* Programme.** The in-depth interview was conducted on December 29, 2020 with representatives of the Ministry of Energy: Zhecho Stankov (Deputy Minister and Head of the PO), Veneta Tsvetkova (Director of the Energy Projects and International Cooperation Directorate) and Hristina Stoichkova. Representatives of Econometrica Ltd. were Alexander Stoyanov, Atanas Atanasov and Maria Bakalova.

***Online surveys with DPPs***

List of DPPs to which online questionnaires were sent:

1. ***Local Development, Poverty Reduction and Improved Inclusion of Vulnerable Groups* Programme**. The survey was sent to Margareta Platon (Council of Europe), Elita Cakule and Christian Larsen (The Norwegian Association of Local and Regional Authorities (KS) and was completed by M. Platon and C. Larsen.
2. ***Cultural Heritage, Entrepreneurship and Cooperation*** **Programme**. The survey was sent to Arts Council Norway and completed by Rannveig Solumsmoen Gimse, Kristine Lunde-Tellefsen and Thea Breivik.
3. ***Justice*** **Programme**. The questionnaire was sent to Kim Ekhaugen and Marthe Hamran (Norwegian Correctioinal Services) and completed by Kristin Saunes Franklin (Senior Advisor, Directorate of Norwegian Correctional Services) and Kim Ekhaugen.
4. ***Home Affairs* Programme**. The questionnaire was sent to and completed by Morten Magnem (National Police Directorate Norway) and Jenna Shearer (Council of Europe).
5. ***Renewable Energy, Energy Efficiency and Security* Programme**. The survey was sent to Bjorn Aulie and Michael Steinfeld (Norwegian Water Resources and Energy Directorate) and Maria Gudmundsdittir (National Energy Authority of Iceland) and completed accordingly by the adressees.
6. ***Environmental Protection and Climate Change* Programme**. The survey was sent to and completed by Svein Terje Baatvik (Norwegian Environment Agency).

***Case-studies***

In the process of evaluation information was gathered on the implementation of selected specific projects financed by the EEA FM and the NFM 2014-2021 within a number of the evaluated Programmes:

1. ***Local Development, Poverty Reduction and Improved Inclusion of Vulnerable Groups* Programme**
* ***Youth Centre Plovdiv – a Powerful Factor for Local Development* Project** Beneficiary: Municipality of Plovdiv. Partner: Norsensus Mediaforum, Norway
* ***Dobrich Youth Centre – Yours Today* Project.** Beneficiary: Municipality of Dobrich. Partner: Municipality of Kopavogur, Iceland;
* ***Youth Centre Stara Zagora – Think Locally, Act Globally* Project.** Beneficiary: Municipality of Stara Zagora. Partner: Glemmen videregaende skole, Norway
* ***Youth Center Vratsa – a Factor for the Development of the Northwest* Project.** Beneficiary: Municipality of Vratsa. Partner: Timis County Youth Foundation, Romania

Online meetings were held with the project teams of the project subjected to analysis:

***Youth Centre Plovdiv – a Powerful Factor for Local Development* Project** – online meeting held on January 13, 2021 with Georgi Tityutkov, Deputy Mayor of Plovdiv Municipality and Dimitria Todorova, Director of the Youth Centre.

***Dobrich Youth Centre – Yours Today* Project** – online meeting held on January 15, 2021 with with Dr. Emilia Baeva, Deputy Mayor for Humanitarian Activities of the Municipality of Dobrich; Eng. Daniela Sivkova, Project manager and head of the IREF department in the municipality of Dobrich; Mimi Ivanova, Director of Dobrich Youth Centre and project coordinator; Nikolay Nikolov and Tsvetelina Dobreva, youth workers at the Youth Centre and part of the project implementation team.

***Youth Centre Stara Zagora – Think Locally, Act Globally* Project** – online meeting held on January 18, 2021 with with Ivanka Sotirova, Deputy Mayor of the Municipality of Stara Zagora and Project Manager, Georgi Simeonov, Project Coordinator, Director of the IEP Directorate at the Municipality of Stara Zagora; Dr. Vessela Mareva, Manager of the International Youth Centre.

***Youth Centre Vratsa – a Factor for the Development of the Northwest* Project** – online meeting on January 15, 2021 with Tsvetelina Teofilova, director of the Youth Centre; Tihomir Mashov, youth expert; Mihaela Mitseva - youth worker and Nikola Zhivkov - youth worker.

1. ***Justice* Programme**

***Strengthening the Professionalism in the Judiciary*** Project. Promoter: Supreme Judicial Council.

1. ***Renewable Energy, Energy Efficiency, Energy Security* Programme**

***Feasibility study on utilizing the hydro power potential in existing water supply systems and upgrading potential for existing small scale hydro power plants in water supply systems*** Project. Promoter: Sustainable Energy Development Agency (SEDA), Partner: Norwegian Water Resources and Energy Directorate (NVE).

1. ***Environment Protection and Climate Change* Programme**

***Implementation of innovative measures for mitigation and adaptation to climate change in municipalities in Bulgaria* Project**. Promoter: National Trust Ecofund (NTEF). Partners: Municipalities of Sofia, Plovdiv, Varna, Burgas, Kurdjali, Ruse, Stara Zagora, Sliven. DPP: The Norwegian Association for Local and Regional Authorities (KS).

The summarized results of the case-studies on the listed projects are presented in Annex 1.

***Desk Research (document analysis)***

The analysis covered a number of programme, project, strategic, planning and normative documents presented in Appendix 2.

# **Overview of the EEA Financial Mechanism and the Norwegian Financial Mechanism 2014-2021**

The Financial Mechanism of the European Economic Area and the Norwegian Financial Mechanism (EEA FM and NFM) represent the contribution of Norway, Iceland and Liechtenstein to reducing economic and social disparities in the European Economic Area and strengthening bilateral relations through partnership projects, exchange of experience and good practices between beneficiary countries and donor countries. The approach to implementing the financial mechanisms is based on the understanding that sustainable development is only possible through the joint efforts and progress of the EEA countries. Bulgaria is a beneficiary country under the EEA FM and NFM since its accession to the EU and the EEA in 2007. Within two programming periods (2007-2009 and 2009-2014) Bulgaria received access to over 160 million euros for support and implementation of over 1000 projects.

On December 9, 2016. A Memorandum of Understanding on the Implementation of the EEA Financial Mechanism 2014-2021 was signed between Iceland, the Principality of Liechtenstein, the Kingdom of Norway and the Republic of Bulgaria. A Memorandum of Understanding on the implementation of the Norwegian Financial Mechanism 2014-2021 was also signed between the Republic of Bulgaria and the Kingdom of Norway.

# 2.1 Goals and and Priority areas

The overall goal of the EEA Financial Mechanism 2014-2021 and the Norwegian Financial Mechanism 2014-2021 is to contribute to reducing economic and social disparities in the European Economic Area and to strengthen bilateral relations between donor and beneficiary countries. These goals are achieved through funding programmes in several priority areas:

1) Innovation, research, education and competitiveness;

2) Social inclusion, youth employment and poverty reduction;

3) Environment, energy, climate change and low carbon economy;

4) Culture, civil society, good governance, fundamental rights and freedoms; and

5) Justice and home affairs.

# 2.2 Funds Allocated

For the programming period 2014 - 2021 (the projects are to be implemented until April 30, 2024), the grant provided to Bulgaria is worth € 210,100,000.

The net amount of financial assistance under the EEA FM for the period 2014-2021, which will be provided to Bulgaria for the implementation of the programmes amounts to € 106,375,000. The Memorandum of Understanding agreed on the financial parameters of the framework for the implementation of the EEA FM:

**Table 2. Financial parameters of the framework for the implementation of the EEA FM**

|  |  |  |
| --- | --- | --- |
| **Programmes** | **EEA FM contribution** | **National co-financing** |
| Local Development, Poverty Reduction and Enhanced Inclusion of Vulnerable Groups | € 35,000,000 | € 6,176,471 |
| Renewable Energy, Energy Efficiency, Energy Security | € 28,000,000 | € 4,941,176 |
| Environment Protection and Climate Change | € 13,000,000 | € 2,294,118 |
| Cultural Entrepreneurship, Heritage and Cooperation | € 10,000,000 | € 1,764,706 |
| Civil Society | € 15,500,000 | € 0 |
|  |  |  |
| **Other amounts** |  |  |
| Technical assistance for the benefiaciatry country | € 730,000 | € 0 |
| Reserves | € 1,845,000 | € 0 |
| Bilateral Relations Fund  | € 2,300,000 | € 0 |
| **Net amount of financial assistance for Bulgaria** | **€ 106,375,000**  | **€ 15,176, 471** |

The net amount of the financial assistance provided to Bulgaria under the Norwegian Financial Mechanism (NFM) is €87,967,500 with the following financial framework for its implementation:

**Table 3. Financial parameters of the framework for the implementation of the NFM**

|  |  |  |
| --- | --- | --- |
| **Programmes** | **Принос на НФМ** | **Национално съфинансиране** |
| Business development, innovation and SMEs | € 28,500,000 | € 0 |
| Social Dialogue – decent working conditions  | € 951,000 | € 0 |
| Justice | € 30,000,000 | € 5,294,118 |
| Home Affairs | € 21,500,000 | € 3,794,118 |
|  |  |  |
| **Other ammounts** |  |  |
| Technical Assistance  | € 1,430,000 | € 0 |
| Reserves | € 3,170,500 | € 0 |
| Reserves for completion of the NFM projects 2009 – 2014 | € 514,000 | € 0 |
| Bilaterla Relations Fund | € 1,902,000 | € 0 |
| **Net amount of financial assistance for Bulgaria** | **€ 87,967,500** | **€ 9,088,236** |

# 2.3 Programme areas, programmes supported by the EEA Financial Mechanism and the NFM 2014-2021and expected results

The financial assistance under the EEA FM and the NFM 2014-2021 is provided for the preparation and implementation of the following programmes in six programme areas, which are in the focus of the mid-term evaluation:

**А. Programme areas:** PA 10Local Development and Poverty Reduction (host ares)

PA 8 Children and Youth at Risk

PA 7 Roma Inclusion and Empowerment

**Programme:** Local Development, Poverty Reduction and Enhanced Inclusion of Vulnerable Groups (BG-LOCALDEV)

**Total budget: €** **41 176 471**

**EEA programme grant:** € 35 000 000

**Goal:** Strengthening economic and social cohesion, ensuring a systematic approach to local development and poverty reduction through integrated measures in the fields of education, employment and healthcare.

**Expected outcomes:**

* creation of jobs in 10 municipalities by developing strategies for economic development and use of local potential;
* construction of a rehabilitation centие for children with oncohematological diseases; elaboration of a project for the construction of a national peadiatric hospital;
* construction of new youth centres and support for the four centres created in the previous programming period;
* establishment of centres for pre-school education and early childhood development, development of innovative models of community care for people with chronic diseases and permanent disabilities, creation of a sustainable mechanism at the national level for the training of Roma mediators, teachers and municipal officials to work with vulnerable groups; inclusion and empowerment of the Roma through integrated measures in the field of education, social and health services and the labour market;
* development of new approaches for generating data on hard-to-reach populations at risk of violation of thei rights.

**Programme operator (PO):** Ministry of Education and Science

**Donor Programme Partner (DPP):** Norwegian Association of Local and Regional Authorities

**International Partner Organization (IPO)**: Council of Europe

**B. Programme area: Renewable Energy, Energy Efficiency, Energy Security**

**Programme:** Renewable Energy, Energy Efficiency and Energy Security (BG-ENERGY)

**Total budget:** € 32,941,176

**EEA programme grant:** € 28,000,000

**Goal:** Reducing hydrogen intensity and increasing security of supply

**Expected outcomes:**

* Increasing the production of energy from renewable sources;
* Improving energy efficiency in buildings, industry and municipalities;
* Increasing the expert capacity in the field of renewable energy, energy efficiency and energy management;
* Improved cooperation between Bulgarian organizations and organizations from donor countries.

**Programme operator:** Ministry of Energy

**Donor Programme Partner (DPP):** Norwegian Water Resources and Energy Directorate (NVE), National Energy Authority of Iceland (OS).

**C. Programme areas: Environment and Ecosystems**

**Cliamate Change Mitigation and Adaptation**

**Renewable Energy, Energy Efficiency, Energy Security**

**Programme:** Environment Protection and Climate Change (BG-Environment)

**Total budget:** € 15,294,118

**EEA programme grant:** € 13,000,000

**Goal:** Improving the state of ecosystems, reducing the adverse effects of pollution and other human activities, as well as mitigating the effects and reducing vulnerability to climate change.

**Expected outcomes:**

* Development of a system for valuation of ecosystem services;
* Improving the system for monitoring and assessment of the condition and management of marine waters;
* Improved use of resources at the municipal level by applying the principles and mechanisms of the “circular economy” and promoting the importance of resource efficiency;
* Increasing the capacity of local communities to reduce emissions and adapt to climate change;
* Improved cooperation between Bulgarian organizations and organizations from donor countries.

**Programme operator (PO):** Ministry of Environment and Water

**Donor Programme Partner (DPP):** Norwegian Environment Agency (NEA)

**D. Programme area: Cultural Entrepreneurship, Cultural Heritage and Cultural Cooperation**

**Programme:** Cultural Entrepreneurship, Heritage and Cooperation

**Total budget: € 11 764 706**

**EEA programme grant:** € 10 000 000

**Goal:** Strengthening social and economic development through cultural cooperation, cultural entrepreneurship and cultural heritage management.

**Expected outcomes:**

* Cultural heritage management enhanced;
* Access to arts and culture improved;
* Awareness of arts and culture of ethnic and cultural minorities improved (Roma focus).

**Programme operator (PO):** Ministry of Culture

**Donor Programme Partner (DPP):** Arts Council Norway

**E. Programme areas: PA 18 Asylum and Migration**

**PA 20 International Police Cooperation and Combating Crime**

**PA 16 Good Governance, Accountable Institutions, Transparency**

**Programme:** Home Affairs

**Total budget:** € 25 294 118

**NFM programme grant:** € 21 500 000

**Goal:** Strengthening the rule of law

**Expected outcomes:**

* Improved capacity of national authorities in the field of asylum and migration;
* Improved capacity of law enforcement agencies in the field of crime prevention and investigation;
* Improved situation of the Roma population;
* Improved capacity of the Bulgarian authorities to tackle economic crime and corruption.

**Programme operator (PO):** Ministry of Interior

**Donor Programme Partners (DPPs):** Norwegian Ministry of Justuce and Public Security (NMOJ), Norwegian Directorate of Migration (UDI) and Norwegian Police Directorate (POD)

**International Partner Organization (IPO)**: Council of Europe (CoE)

**F. Programme areas: PA 19 Correctional services and Pre-trial Detention;**

**PA 21 Еffectiveness and efficiency of the judicial system, strengthening the Rule of Law**

**Programme:** Justice.

**Total budget:** € 35 294 118

**NFM programme grant:** € 30 000 000

**Goal:** Strengthening the rule of law

**Expected outcomes:**

* Improved correction services;
* Improved implementation of the European legal framework by the Bulgarian judicial system;
* Improved capacity of the Bulgarian authorities in the field of juvenile justice;
* Improved capacity of the Bulgarian authorities in the field of domestic violence and gender-based violence.

**Programme operator:** Ministry of Justice

**Donor Programme Partners (DPPs):** Norwegian Ministry of Justice and Public Security (NMoJ), Directorate of Norwegian Correctional Service (KDI)

**International Partner Organization (IPO)**: Council of Europe (CoE).

## **Analysis and Evaluation of the Implementation of the Programmes Supported by the EEA Financial Mechanism and the NFM**

## 3.1 Analysis and evaluation of the implementation of *Local Development, Poverty Reduction and Improved Inclusion of Vulnerable Groups* Programme

The analysis and evaluation of the implementation of *Local Development, Poverty Reduction and Improved Involvement of Vulnerable Groups* Programme is consistent with **the overall objective** to conduct an interim evaluation of the implementation of programmes funded by the EEA FM and NFM 2014-2021.

**The specific objectives** of the evaluation of the *Local development, poverty reduction and improved inclusion of vulnerable groups* Programme are:

* To assess the progress in the implementation of the programme based on the analysis and evaluation of its objectives, results and products that are expected to be realized from the implementation of the funded interventions/projects;
* To assess the expediency, effectiveness and efficiency of the implementation of the *Local Development, Poverty Reduction and Improved Inclusion of Vulnerable Groups* Programme, taking into account its specific target groups and specific objectives;
* To evaluate the achieved results of the interventions under the *Local development, poverty reduction and improved inclusion of vulnerable groups* Programme, as well as the probability of achieving or the risk of not achieving the planned results under the individual programmes;
* To assess identified problems and good practices (strengths and weaknesses) from the implementation of the *Local development, poverty reduction and improved inclusion of vulnerable groups* Programme, as well as to formulate suggestions aimed at overcoming the identified problems and to offer recommendations that can serve in the process of making informed management decisions.

The evaluation is based on the progress in the implementation of the *Local Development, Poverty Reduction and Improved Inclusion of Vulnerable Groups* Programme for the period since the signing of the Programme Agreement between the National Focal Point (NFP) and the EEA FM Office (FMO) until June, 302020. The focus of assessment was the possibility of achieving the pre-set goals and results within the deadline for project implementation – April 30, 2024.

1. **Objectives, design, and coordination of the Programme**

In this section, the *Local Development, Poverty Reduction and Improved Inclusion of Vulnerable Groups* Programme is analysed in relation to the following key evaluation issues:

* To what extent are the priorities, the selected interventions and the applied approach (eligible activities, costs, beneficiaries, etc.) appropriate and correspond to the needs, problems and limitations of the target groups of the programme?
* To what extent does the programme interventions complement the support provided under other programmes and financial instruments (in particular ESIF funding and other EU-funded programmes)?
* What is the link and synergy between the programme and the measures implemented under other programmes in order to achieve the national and pan-European goals for economic development and social cohesion?
	1. ***Programme goals and compliance with the needs of the target groups***

The main goals of the *Local development, poverty reduction and improved inclusion of vulnerable groups* Programme are to strengthen economic and social cohesion, ensure a systematic approach to local development and poverty reduction through integrated measures in the field of education, employment and health.

In connection with the evaluation of programme goals and priorities, information was collected on several main topics:

1. Correspondence of programme goals and priorities with the problems and needs of the target groups;

2. Adequacy and feasibility of the objectives, approach and activities of the programme;

3. Suggestions for changing/supplementing the goals and activities of the programme.

**Overall, the goals and objectives of the programme can be assessed as adequate to the needs and problems of its target groups.** The goals and priorities of the programme are formulated through a process of intensive consultations with national and international governmental and non-governmental organizations identified as stakeholders. For example, on March 28, 2017, a national stakeholder consultation was organized with the participation of about 30 representatives of national and local authorities, national and international non-governmental organizations, youth centres and other organizations working in local communities, representatives of donor countries and the Council of Europe. The results of the discussions were taken into account in the development of the underlying concept and ideas of the *Local Development, Poverty Reduction and Improved Involvement of Vulnerable Groups* Programme. The experience from the implementation of the programmes and projects supported by the Financial Mechanism of the European Economic Area and the Norwegian Financial Mechanism (EEA FM and NFM) in the previous 2009-2014 period has been also taken into account. The envisaged bilateral activities are construed as a means of transferring experience and good practices from the donor countries to Bulgaria.

**The needs, identified by the stakeholders in the process of programme elaboration, determine the logic and content of the planned interventions.** The programme addresses several key challenges and priorities of the target groups by means of financing project in three directions:

**First, increased social and economic development of disadvantaged municipalities (Programme Area 10: Local Development and Poverty Reduction).** Social and economic vulnerability is particularly visible at the local level, where in most of the country's administrative regions (North-West, North-Central, Northeast and South-Central) the gross domestic product per capita is below 45% of the EU average. Disadvantaged municipalities are characterized by processes of depopulation and aging, high unemployment, deteriorating quality of social and health services. In this context, the projects supported by the EEA FM and the NFM are addressed mainly to several vulnerable target groups – children and youth, the elderly, the unemployed, disadvantaged Roma, people with disabilities and deteriorating health. Innovative and sustainable models for local socio-economic development are being sought in order to mobilize unused local natural, cultural, historical and human resources that can generate employment, income, better social and health services.

**Second, improved social inclusion of children and young people (Programme area 8: Children and Youth at Risk).** The programme targets children and youth in disadvantaged municipalities in two main aspects: (a) as a valuable and underused resource for the economic and social development of these municipalities; (b) as a vulnerable group at risk who needs support with a special focus on Roma children and youth. In the first aspect, specific services and trainings are offered, oriented towards young people – opportunities for non-formal education, professional and career counselling, empowerment through trainings in the field of human rights, democratic values, and anti-discrimination. The second aspect aims at breaking the vicious circle of marginalization by focusing mainly on education – overcoming educational inequalities and social segregation, increasing access to preschool childcare and education, reducing school dropout, increasing educational achievements, and others.

**Third, improved Roma inclusion (Programme area 7: Roma Inclusion and Empowerment).** The identified problems in the field of education, employment, health care, social exclusion and marginalization are more pertinent to the Roma community than to the majority of the Bulgarian population. In this regard, the programme supports initiatives aimed at strengthening the work with families and the community, providing social and health services, enhancing the activities of Roma educational mediators, teaching in Bulgarian, and others. Particularly adequate are the projects, including integrated measures in the field of education, employment, social and health services, implemented in compact Roma communities, including the so-called “Roma ghettos”. Amongst the set goals are also the transformation of the existing negative attitudes and ethnic prejudices towards the Roma harboured by part of the Bulgarian population and institutions. The implementation of policies and programmes for Roma inclusion, based on facts and oriented towards tangible results, implies the availability of reliable and specific information about Roma access to and level of education, employment and unemployment, social and health status, social and political participation, etc.

* 1. ***Projects and expected outcomes***

In order to achieve the programme goals and objectives a number of initiatives is supported (summary information is presented in Annex 1). The following results are expected to be achieved:

1. Job creation by developing strategies for economic development and the use of local potential in 10 municipalities;
2. The construction of a rehabilitation centre for children with oncohematological diseases and preparation of a project for the construction of a national paediatric hospital;
3. The construction of new youth centres and support for the four centres created in the previous programming period;
4. The establishment of centres for preschool education and early childhood development;
5. Building innovative models of community care for people with chronic diseases and permanent disabilities;
6. The establishment of a sustainable mechanism at the national level for the training of Roma mediators, teachers and municipal employees to work with vulnerable groups;
7. Inclusion and empowerment of the Roma through integrated measures in the field of education, social and health services and the labour market;
8. The development of new approaches for generating data on hard-to-reach populations at risk of violating their rights.

**The programme is being implemented through a set of pre-defined projects (PDPs), calls for project proposals and small grant schemes (SGS)**, targeting specific groups and contributing to the objectives and expected results of the programme, as follows:

**Objective 1. Increased social and economic development in disadvantaged municipalities.**

To achieve this goal, the following initiatives were initially planned:

* Pre-defined project 1 (PDP1) *Growth through Activating Local Potential* (GALOP), promoted by the National Association of Municipalities in the Republic of Bulgaria;
* Pre-defined project 2 (PDP2) *Innovative Community Care Models for People with Chronic Diseases and Permanent Disabilities*, promoted by the Bulgarian Red Cross;
* Pre-defined project 3 (PDP3) *Recovery Centre for Children with Oncohaematological Diseases*, promoted by the Kostinbrod municipality;
* Pre-defined project 4 (PDP4) *Pre-Feasibility Study for a National Paediatric Hospital in Bulgaria*, promoted by the Ministry of Healthcare;
* Small grant scheme (SGS): Job creation (enhancing local development though support for innovative approaches to strengthen economic activities and job creation in the target areas);
* A restricted call for project proposals “Youth Centres: a powerful factor for local development” (local development and expansion of the existing four youth centres in Stara Zagora, Plovdiv, Dobrich and Vratsa, established in the previous programming period 2009-2014 with the support of the EEA FM and the IMF).

The PO launched on May 4, 2020 a procedure for the implementation of PDP 4 *Pre-Feasibility Study for a National Paediatric Hospital in Bulgaria*. At the request of the Ministry of Healthcare, however, the procedure was terminated on June 5, 2020 due to the elimination of the need for this project.

**Objective 2. Improved social inclusion of children and youth**

To achieve this objective the following initiative are envisaged:

* PDP 5: *Capacity Building for Inclusion in Bulgaria* (INCLUDE), promoted by the Council of Europe;
* A Call for project proposals: *Early Childhood Development and Care*;
* A Call for project proposals: *Building new youth centres*.

After the Council of Europe announced that it would not implement PDP 5 *Capacity Building for Inclusion in Bulgaria* (INCLUDE), opportunities have been sought for its modification in order to achieve the original goal.

**Objectives 3. Improved Roma inclusion**

This objective is achieved through:

* PDP 6*Novel Approaches to Generating Data on Hard-to-Reach Populations at Risk of Violation of Their Rights*, promoted by the National Statistical Institute;
* A Call for project proposals: *Integrated measures (support for integrated projects for improved access to education, employment, social and health care and services)*.
	1. ***Programme coordination/synergy***

**An important aspect of the evaluation is the complementarity between the evaluated programme and the measures implemented under other programmes with a view to achieving the national and pan-European goals for economic development and social cohesion.** The coordination with other financial instruments (in particular with the European Structural and Investment Funds/ESIF), as well as the synergy with other programmes and interventions financed by the EEA FM and the NFM are analysed.

The programme is elaborated in accordance with the main national strategic and legal documents:

* **The National Strategy for Poverty Reduction and Promotion of Social Inclusion 2020**, aimed at building and implementing a unified, consistent and sustainable policy in the field of social inclusion, based on an integrated approach and intersectoral cooperation at national, regional, district and municipal levels. It aims to actively include economically and socially marginalized groups in the labour market, increase access to education, and provide social and health services.
* **National Youth Strategy (2010-2020**) aimed at creating favourable conditions for the training of young people in Bulgarian schools and universities; development of non-formal education; the professional, social and personal development of young people, their active involvement in the life of local communities and in the management at national, regional and local level.
* **The National Strategy for Roma Integration in the Republic of Bulgaria** (2012 - 2020) and its Action Plan that take an integrated approach to reducing the vulnerability of the Roma in the field of education, employment, health, culture, anti-discrimination.
* **The Framework Programme for Integration of the Roma in the Bulgarian Society (2010 - 2020)**, which is aimed at mobilizing responsible institutions and civil society to combat discrimination, reduce poverty, inequality, and social exclusion of the Roma.
* **Preschool and School Education Law**, which emphasizes the social, intellectual, moral, physical and emotional development of each child, as well as respect for national, ethnic, religious, cultural and linguistic identity as a competence that students should acquire.

An example of achieving a synergetic effect is the upgrading of the activities of the youth centres established with the support of the EEA FM and the NFM in the previous period (BG06 “Children and youth at risk”) and the creation of new youth centres. This initiative is directly related to the task of the National Youth Strategy (2010-2020) for the development and implementation of quality standards in the provision of services for the Bulgarian youth, which is funded by the Human Resources Development Operational Programme.

The European Social and Investment Fund (ESIF) also provides funding for a number of programmes related to target groups and activities supported by the *Local Development, Poverty Reduction and Improved Inclusion of Vulnerable Groups* Programme (such as, for instance, youth policies, social and educational inclusion, social services for the elderly, etc.). The Roma are the main target group of an integrated procedure for the socio-economic integration of marginalized communities, which has been established under the EU Operational Programmes “Science and Education for Smart Growth”, “Human Resources Development” and “Regions in Growth”. The procedure provides for integrated measures in education, employment, health and social services, housing and anti-discrimination and is implemented in 52 out of 265 municipalities. The *Local Development, Poverty Reduction and Improved Inclusion of Vulnerable Groups* Programme has been developed considering the funding schemes under this integrated procedure. It uses their experience and good practice. However, in order to avoid overlap and double funding, projects outside the ESIF-funded 52 municipalities are supported.

There are opportunities for additional funding under the PDP 1 *Growth through activating local potential* (GALOP) implemented by the National Association of Municipalities in the Republic of Bulgaria (NAMRB), since a number of programmes aimed at local development and job creation are implemented under ESIF. NAMRB is institutionally very well positioned as an official representative of the municipalities in the country with the right of legislative initiative. It participates in the monitoring committees of several operational programmes, implements a number of projects in the field of local development and thus can ensure sustainability of the achieved results.

The PDP 2 *Innovative Community Care Models for People with Chronic Diseases and Permanent Disabilities* implemented by the Bulgarian Red Cross (BRC) is also an example of a synergistic approach. The applied model of community care was initially tested by the BRC under the “Home care for independent and dignified life” project, funded by the Swiss Agency for Development and Cooperation in partnership with the Ministry of Health and the Ministry of Labour and Social Policy. This approach has also been adopted by the ESIF under the programme for home care for the elderly and people with disabilities (component 2). This scheme aims at creating a network for hourly mobile integrated social and health services for people with disabilities and the elderly (over 65) and has a total budget of BGN 45.7 million. What is new in the planned activities is the introduction of tele-assistance services, which are developed building on the Norwegian model, adapted to the Bulgarian context (in this respect the contribution of the Norwegian donor project partner Lindas Kommune is significant). These services are innovative and do not exist in the country, being particularly adequate for remote areas and disadvantaged communities. They envisage the development and maintenance of four existing centres, the creation of three new and a call centre, which correspond to the priority trends for deinstitutionalization and transition to community-based services, as well as the development of integrated (including medical and social) services. BRC representatives report that they are working on this project in cooperation with the National Organization of Patients and have consulted patient NGOs, especially for the development of telemedicine services.

1. **Assessment of the progress, delays, and risks in the implementation of the programme**

In this section, the analysis focuses on the following key evaluation issues:

* What is the progress made (as of June 30, 2020) under the programme in terms of the negotiation and implementation of measures, incl. in terms of achieved results?
* Are there any deviations/delays from the initial programme implementation schedule? What is the reason for this and what is the potential impact of this delay on the successful implementation of the interventions and the achievement of the set results?
* Is there a realistic up-to-date plan for the implementation of the measures under the programme?
* What problems have been identified in terms of: project design and programming of interventions, selection of project proposals, contracting, monitoring and reporting, financial control and payment, prevention systems, risk management systems, registration and reporting of irregularities, procedures on monitoring, evaluation and reporting on the implementation of the programme, information and communication measures, etc.?
	1. ***Programme implementation status***

**Based on the elaborated evaluation, several conclusions can be drawn regarding the status of the *Local Development, Poverty Reduction and Improved Inclusion of Vulnerable Groups* Programme as of June 30, 2020:**

First, with the exception of the withdrawn projects, the implementation of all the pre-defined projects has started. For the former, attempts are being made at their modification: PDP 4 *Pre-Feasibility Study for a National Paediatric Hospital in Bulgaria*” with the Ministry of Health as contractor and PDP 5 *Building Capacity for Inclusion in Bulgaria* (INCLUDE).

Second, contracts have been signed for three pre-defined projects and related activities have started:

• PDP 1: *Growth through Activating Local Potential* (GALOP), with promoter the National Association of Municipalities in the Republic of Bulgaria;

• PDP 2: *Innovative Community Care Models for People with Chronic Diseases and Permanent Disabilities*, with promoter the Bulgarian Red Cross;

• PDP 6: *Novel Approaches to Generating Data on Hard-to-Reach Populations at Risk of Violation of Their Rights*, with promoter the National Statistical Institute.

Third, in June 2020 PDP 3 *Recovery Centre for Children with Oncohaematological Diseases*, promoted by the Municipality of Kostinbrod, was evaluated and agreed upon. On September 14, 2020, the newly constructed complex under the *Recovery Centre for Children with Oncohematological Diseases* project, built on the territory of the Kostinbrod Municipality, is officially put into operation. The complex includes a modern administrative building, which houses offices and halls for various activities, seven family-type houses, a dining room, a swimming pool, a sports ground, a vegetable garden, a place for spiritual solitude and reflection. The project provides funds for the overall operation of the rehabilitation centre in the next two years. The newly built complex meets modern standards in the provision of appropriate conditions for full physical and mental recovery of children and their close family.

Fourth, in September 2019 a procedure was initiated with a restricted call for project proposals under the *Local development and expansion of the existing youth centres* scheme, aimed at the four youth centres in Stara Zagora, Plovdiv, Dobrich and Vratsa, established in the previous programming period (2009 2014) with the support of the EEA FM and the NFM. The evaluation of the projects was done on time; it was organized online and through written correspondence. The four projects were prepared in June 2020 and their implementation starts on July 1, 2020.

Fifth, a procedure for the application, evaluation and selection of project proposals for the establishment of new youth centres has been prepared and conducted. On September 27, 2019, the PO has launched a call for proposals under this procedure with a deadline for submission of proposals in Information system for management and monitoring (ISMM) of EU funds in Bulgaria by December 30, 2019. Indicative of the significant interest in this call is that 14 applications were received from 23 eligible municipalities. The assessment process started on January 22, 2020 and was extended by 3 months due to the pandemic situation. The project proposal evaluation report was presented on July 15, 2020. Following the completion of the work of the international Project Selection Committee, the PO announced on October 7, 2020 the list of projects for funding and the list of reserve projects. The following projects have been approved for funding:

* *Opportunity for Expression of Young People - Creation of a Youth Centre in Gabrovo* (Gabrovo Municipality);
* *Creation of a Youth Centre in the City of Montana* (Montana Municipality);
* *Establishment of an International Youth Centre Burgas* (Municipality of Burgas);
* *Building a Youth Centre Pernik - a Model for High Standards of Youth Work* (Municipality of Pernik).

**The implementation of the pre-defined projects is generally carried out according to the approved schedule. The progress, that has been made so far, is summarized below:**

* The implementation of **PDP 1 *Growth through Activating Local Potential* (GALOP)**, implemented by the National Association of Municipalities in the Republic of Bulgaria, started on June 26, 2019 and should be completed in 36 months. The GALOP project was presented publicly within the 11th National Meeting of Experts on Programmes and Projects of Local Authorities (Sofia, November 11-13, 2019). The event was attended by representatives of national and local authorities, management bodies of operational programmes funded by the EU, representatives of DG "Regional and Urban Policy" of the European Commission, more than 200 municipal experts and others. The opening event of the project took place on December 11, 2019 in Sofia with the participation of Bulgarian and Norwegian municipalities. The website for the GALOP project is operational in English and Bulgarian (<https://galop.namrb.org>).

This project aims at creating sustainable models that will permanently lead to improved employment opportunities and poverty reduction in small towns and disadvantaged villages. To achieve this goal and provide the necessary expertise, a cooperation agreement has been concluded with the Telemark Research Institute (TF), Norway. A study was carried out of both successful national practices and good practices in ten Norwegian municipalities. The good Bulgarian and Norwegian practices identified by NAMRB are summarized in four categories: social capital, cultural heritage, economic potential and environment. The main focus of the study is the opportunity to identify untapped local resources to be mobilized for potential job creation and local development. The project partners have developed a methodology for selecting 10 pilot municipalities for the implementation of key activity 2 under the project.

The opportunities provided by the GALOP project provoked great interest in the competition, and the presented concepts demonstrate a thorough approach of the municipalities to the specific problems of the local community and skills to look for various opportunities to overcome them. On 30.10.2020 the evaluation of the presented 41 concepts for local economic development, with which the municipalities apply for support under the GALOP project, is completed. The Interdepartmental Commission, which includes representatives of NAMRB, experts from the Norwegian Association of Local and Regional Authorities, the PO of the *Local Development, Poverty Reduction and Improved Inclusion of Vulnerable Groups* Programme and the Central National Coordination Unit Directorate of the Council of Ministers (NFP), selected ten applications. They will receive financial support for the implementation of their concepts for local economic development of the municipalities of Bansko, Belitsa, Brezovo, Valchi Dol, Dimitrovgrad, Elena, Ivanovo, Levski, Lyaskovets, and Momchilgrad. This creates the prerequisites for launching the procedures for the implementation of the small grant scheme for job creation, which is directly related to PDP 1 *Growth through Activating Local Potential* (GALOP). **At this stage, the approved project concepts can be assessed as having the capacity to contribute to overcoming the socio-economic problems of the region, to creating employment and to achieving sustainable results.**

* The implementation of the **PDP 2 *Innovative Community Care Models for People with Chronic Diseases and Permanent Disabilities***, implemented by the Bulgarian Red Cross started on May 17, 2019. The aim of the project is to create and implement an innovative model of remote care for chronic diseases (telemedicine), based on the use of modern information and communication technologies. This improves the access of vulnerable single people with chronic illnesses and permanent disabilities to professional medical and social support (including beneficiaries in remote rural areas). The new service is based on the activities of the Home Care Centres (HCC), providing home services in the Vratsa district, which are expanding in two new regions (Vidin and Montana). Building on the Norwegian experience, the activities of HCC in the three regions are gradually combined with tele-assistance services, a system of 24-hour call centre is created (based in Vratsa), the necessary staff is recruited and trained.

The target group includes people over the age of 50 with chronic diseases and disabilities. In addition, effective models are elaborated of social inclusion and integration of low-educated, long-term unemployed, incl. representatives of the Roma and other ethnic minorities by providing vocational training and qualifications and creating employment opportunities in the field of community-based health and social services. The mobile teams of HCC are already working in the municipalities of Vratsa, Krivodol, Oryahovo and Byala Slatina. There are 41 people employed in the Vratsa region - 16 nurses, 24 domestic assistants and one regional team leader. At the end of 2019, 395 beneficiaries with chronic diseases and permanent disabilities were registered to receive medical and social services in their homes in 15 smaller villages in the territories of the four above-mentioned municipalities. The municipalities of Montana and Belogradchik provide free of charge premises for the needs of HCC established there in 2020. An HCC has also been opened in Vidin.

An assessment of the needs and social profile of the potential beneficiaries of the project in the Vratsa district was performed, and information was collected on the most common diseases among them. A market study of the available technological solutions in the health and social sphere was carried out, followed by the development of technical specifications for the purchase of equipment to be installed in patients' homes for the needs of the service providing telehandling and telecare.

The cooperation with the donor project partner organizations is active, which significantly contributes to the implementation of the project. With the assistance of the Norwegian Association of Local and Regional Authorities, a study of the Norwegian experience was conducted with a focus on the provision of telemedicine services. A national conference was held with the participation of several Norwegian municipalities, as well as representatives of the Western University of Applied Sciences (Bergen), who presented the experience and good practices of Norway in the field of telemedicine and telecare.

In addition to the mentioned national conference, the publicity activities include an initial press conference to present the project to the media with the participation of project partners and other stakeholders, as well as the development of a project website (<http://e-homecarebg.com/en/>).

* **PDP 6** ***Novel Approaches to Generating Data on Hard-to-reach Populations at Risk of Violation of their Rights***, implemented by the National Statistical Institute in partnership with the EU Agency for Fundamental Rights (FRA), was launched on June 19, 2019. The main goal of the project is to develop innovative methods for generating data needed to make adequate decisions to address the challenges of vulnerability at regional and local level.

**The project is being implemented in accordance with the adopted schedule, despite the complicated epidemiological situation in the country.** On August 2, 2019 an inaugural press conference was held with the media and stakeholder representatives, a project website was developed (<https://www.noveleea.bg/home/>) and two round table discussions were held with representatives of public institutions and non-governmental organizations. The methodological documents for the design of the study were prepared in accordance with the requirements presented in the thematic report [“Overview of the legal and policy frameworks addressing ‘vulnerability’ of violation of fundamental rights and poverty and social exclusion and groups at risk in Bulgaria”](https://www.noveleea.bg/wp-content/uploads/2019/12/report1.7z) and thematic report  [“Overview of data and indicators for monitoring ‘vulnerability’ of groups at risk in Bulgaria”](https://www.noveleea.bg/wp-content/uploads/2019/12/report2.7z).

As part of the project, experts from the National Statistical Institute visited the independent social science research foundation FAFO in Oslo, Norway on October 31, 2019. Bulgarian statisticians were acquainted with the experience of Norwegian researchers in terms of criteria for identifying vulnerable groups, the main factors of vulnerability and the methods used to achieve them.

A working meeting was held at the NSI Training Centre with representatives of non-governmental organizations, the scientific community and the EU Agency for Fundamental Rights in connection with the preparation of a questionnaire for a nationally representative survey, including a special module for the study of discrimination. Despite the complicated situation in the country, given the measures to limit the spread of COVID-19, a nationally representative survey of households in Bulgaria was conducted within the project. In the period from May 19 to September 17, 2020, 26,600 people aged 15 and over and 3,600 children were surveyed. The data from the survey will be used to develop strategic analytical documents that will find their application in management decisions, planning adequate social policies, development of target indicators for operational programmes and monitoring the implementation of the Sustainable Development Goals.

The draft Guidelines for **the call for "Improvement of the conditions for education and care of children from three to six years" project proposals** was published by the PO for public discussion. A "round table" was organized with experts from the state administration, municipalities and non-governmental organizations working in the field of early childhood development and education. After reflecting the received recommendations, the guidelines was sent for coordination with the National Focal Point and the Financial Mechanism Office. Due to identified inconsistencies with the Programme Agreement and the Concept Note of the programme, new guidelines for application are to be prepared in agreement with the partners, the FMO and the NFP.

**In general, the implementation of the *Local Development, Poverty Reduction and Improved Involvement of Vulnerable Groups* Programme is carried out at a relatively good pace with some delays in certain projects and procedures, which at this stage still do not jeopardize the implementation of objectives and achievement of expected results.**

* 1. ***Changes, deviations, and delays in the implementation of the programme***

Since the launch of the *Local Development, Poverty Reduction and Improved Vulnerability Inclusion* Programme, several changes have taken place:

First, the Council of Europe decided to abandon the project on capacity building for inclusion in Bulgaria (INCLUDE). The PO has taken action to ensure the achievement of the most important objectives of the dropped-out project. The development of a new project aimed at building capacity for educational and social inclusion has been discussed to be developed by the Ministry of Education and Science with the Centre for Educational Integration of Children and Students from Ethnic Minorities (CEICSEM) as the project promoter and Sofia University as a project partner. It is planned to conduct trainings for educational mediators, pedagogical and non-pedagogical staff of kindergartens, as well as "trainings for trainers" in the field of early childcare. The NFP requires additional consultations with the Cooperation Committee, the FMO and relevant stakeholders, as well as additional analytical information on compliance with the needs of the target groups, the possibility of overlapping with existing activities and their complementarity. There is currently no formal decision to include the new project in the discussion agenda, which poses a risk to its implementation.

Second, a change in the Programme Agreement was made in October 2019. It was requested by the Ministry of Healthcare (MoH) regarding the content of their PDP *Pre-feasibility Study for a National Paediatric Hospital in Bulgaria*. Since in the meantime the Ministry of Healthcare has found a suitable place for the National Paediatric Hospital, the need for a pre-feasibility study has been eliminated. The Ministry of Healthcare proposed the project to be replaced by the preparation of a conceptual and technical design of the hospital building. After informing the NFP about the situation, the PO requested more detailed information and justification from the Ministry of Healthcare, after which it made a formal request to amend the Programme Agreement, approved by the FM Office and into force since October 4, 2019. PO started on May 4, 2020 a procedure for the implementation of this project, but at the request of the Ministry of Healthcare, the procedure was terminated on June 5, 2020. The Ministry of Healthcare is expected to propose a new project idea to be discussed with the PO, the NFP and the FMO, but so far, there is no agreed solution on this issue. According to the PO, the MH team does not have sufficient capacity to formulate a clear concept for a new project.

On May 2, 2019, the PO sent to the members of the NFP, the Cooperation Committee and the FMO an updated schedule for the implementation of the Programme; the planned monitoring visits were updated accordingly.

**The Norwegian Association of Local and Regional Authorities identified some delays in the implementation of the programme (mostly at project level).** They are manifested in the relatively slow development of the programme and the signing of the Programme Agreement (caused by all parties); the delayed development of the Information system
for management and monitoring (ISMM) of EU funds in Bulgaria; the heavy and cumbersome Bulgarian administrative system and the somewhat strong centralization of the activity of the PO with a limited delegation of tasks and responsibilities. The delay of the Bulgarian Red Cross is considered as more significant, where a discrepancy is found between the current staff costs and the delayed delivery of equipment.

**Restrictions caused by the pandemic emergency led to some changes in the schedule or manner of implementation of the activities of the agreed projects, to the postponement of calls for proposals, the extension of the deadlines for submission of applications and the evaluation procedures.** The launch of calls for existing and new youth centres has been delayed but has eventually been successful. The assessment process started on January 22, 2020 and has been extended by 3 months due to the pandemic situation.

**There has been some delay in the initially adopted timetable for the implementation of the Programme, which mainly concerns the activities for improved social inclusion of the Roma, related to the announcement of an open procedure for calls for proposals for integrated projects to improve access to education, employment, social and healthcare and services.** To catch up and in response to the recommendations of the NFP, the PO organized a public discussion of the main provisions of the Guidelines for applicants for the forthcoming call. On December 2, 2020, a "round table" was held to discuss the published on November 18, 2020 proposals for Guidelines for applicants and selection of integrated projects in support of Roma inclusion. After their approval by the programme partners, the NFP and the FM Office, the project recruitment procedure will start.

* 1. ***Identified problems in programme management***

Based on the PO’s practical experience with the first procedures for selection of project proposals under the *Local Development, Poverty Reduction and Improved Inclusion of Vulnerable Groups* Programme and encountered problems, changes have been made in the Management and Control System at programme level (Version 2.3 from 26.05.2020), related to the procedures for project selection and use of the Information system
for management and monitoring (ISMM) of EU funds in Bulgaria.

Several problems have been identified in relation to the management of the *Local Development, Poverty Reduction and Improved Involvement of Vulnerable Groups* Programme:

* Some of the pre-defined projects are not implemented due to organizational and administrative problems of the project promoters: PDP 4 *Pre-Feasibility Study for a National Paediatric Hospital in Bulgaria*, implemented by the Ministry of Healthcare and PDP 5 *Capacity Building for Inclusion in Bulgaria* (INCLUDE) with the Council of Europe as the main contractor.
* Non-compliance by the project promoters with the applicable rules and procedures in the implementation of the projects.
* Insufficient administrative capacity for project management in small municipalities.
* Insufficient technical equipment for the normal functioning of the PO.
* Failure to achieve the results of bilateral activities and to form a sufficient number of bilateral partnerships.

**The Norwegian Association of Local and Regional Authorities has registered a number of problems in the programme management**: First, delayed procedures in announcing the calls for proposals, each of which is developed one after another rather than in synchrony. Calls are developed with specific rules for each pre-defined project, which is unnecessary and causes delays. Second, the terms of reference for the evaluators in the selection of project proposals are focused more on the technical aspects than on the quality criteria. The evaluators could not explain their arguments to the selection committees, which caused delays and concerns about the transparency of the process.

1. **Assessment of the effectiveness and efficiency of the programme**

In this section, the implementation of the programme is analysed with a focus on the following key evaluation issues:

* Is the support provided under the programme focused on the most effective and efficient interventions in terms of the goals of the two financial mechanisms, as well as the needs and priorities of Bulgaria in the programming period?
* To what extent have the results, indicators and objectives been achieved or expected to be achieved within the Programme? Is there a risk of not achieving the pre-set results and planned values of the indicators and what factors (internal or external to the programmes) cause this risk?
* Are the necessary resources (financial, in terms of time, administrative capacity, procedures, etc.) available to ensure the effective and efficient achievement of the set results, indicators and goals?
* Has the programme operator identified a risk of delay in the implementation of interdependent measures and interventions and how is this risk addressed?

**In general, the implementation of the projects and measures under the programme is at an early stage, which does not allow for definitive assessments of the effectiveness and efficiency of the programme.** In terms of effectiveness, the analysis is focused primarily on assessing the measurability, feasibility and probability of achieving the objectives and expected results of the programme, as well as the risks of not achieving them. With regard to efficiency, an assessment was made of the adequacy of the total amount of financial assistance provided under the EEA FM, how the financial resources are used, and proposals for relocation of funds.

* 1. ***Evaluation of the effectiveness***

**The *Local Development, Poverty Reduction and Improved Inclusion of Vulnerable Groups* Programme creates added value by developing and implementing innovative models and tools based on a systematic approach to sustainable local development, poverty reduction and the inclusion of vulnerable groups.** These relate to the development of strategies for local development, employment in local communities, development of pre-school, school and non-formal education, youth policies and activities, investment and provision of social and health services, building a system for collecting disaggregated data on vulnerable groups, and others. It is also envisaged to support the municipalities to increase their administrative and expert capacity for preparation and submission of project proposals, implementation and reporting of projects funded by various national and international donor programmes.

**The programme replicates and upgrades good practices and approaches implemented within the BG06 programme of the EEA FM and NFM in the period 2009-2014** such as the models for development of youth centres, training modules for teachers on intercultural education, training of Roma educational mediators and others.

To measure the degree of achievement of both the general and specific objectives of the *Local Development, Poverty Reduction and Improved Inclusion of Vulnerable Groups* Programme and the expected results of the supported interventions, a system of indicators has been developed, which provides an opportunity to monitor the progress of the programme implementation. This system can be assessed by applying the widely accepted SMART criteria in terms of the specificity, measurability, achievability, realism and timeliness of the indicators, which are expected to be:

* Specific – the indicators are specific and adequately reflect the content of the general goals and the specific objectives of the programme;
* Measurable – indicators are aimed at a desired future state and are quantified (most of them) so as to allow measurement.
* Achievable – there are set target values for the indicators and they are achievable, but in some of them no basic values are indicated;
* Realistic – the target values of the indicators are realistic and relevant to the expected results;
* Timely – specific deadlines are defined for the implementation of the programme and reaching the target values of the indicators.

The PPD (Norwegian Association of Local and Regional Authorities) marks down some problems with the measurement of some indicators in the GALOP project, as measuring their values implies significant financial costs that are not planned in the project budget. Discussions are underway to address this issue, because if some of the indicators are difficult to measure, it is not clear whether they have really been achieved.

Despite the attempts to modify the problematic pre-defined projects (PDP 4 *Pre-Feasibility Study for a National Paediatric Hospital in Bulgaria*, contracted by the Ministry of Healthcare and PDP 5 *Capacity Building for Inclusion in Bulgaria* (INCLUDE), with contractor the Council of Europe) there is a real risk of failure to achieve the goals to which they are aimed and respectively the initially defined indicators if their updating and restarting is not accelerated.

The implementation of the programme and the progress made are regularly monitored by the PO. Online meetings with the project teams are held regularly and the implementation of the projects, the achieved results and the attainment of the target values of the indicators are monitored. However, the pandemic situation limits the possibility for on-site visits and direct monitoring of the progress of ongoing projects.

**The planned programme initiatives are aimed at interventions, which at this stage can be assessed as appropriate, effective, realistic and traceable in terms of the goals of the EEA FM and the NFM. They are adequate to the needs and priorities of Bulgaria in the current programming period and largely correspond to the problems and needs of the target groups of the Programme.**

* 1. ***Evaluation of the financial resources and efficiency of the programme***

The financing of the programme is assessed both in terms of the adequacy of the total amount of financial assistance provided under the EEA FM to achieve the objectives and priorities of the programme, and in terms of its compliance with the needs of the target groups. Specific proposals for changes in the amount of funds under the programme and a possible relocation of financial resources were also sought.

The total budget of the programme amounts to EUR 41,176,471. The contribution of the EEA FM is EUR 35,000,000, the national co-financing is EUR 6,176,471. In the period from the signing of the Programme Agreement for financing the *Local Development, Poverty Reduction and Improved Inclusion of Vulnerable Groups* Programme until June 30, 2020, which outlines the time horizon of the mid-term evaluation, the total amount (includingnational co-financing) of transfers to the PO amounts to EUR 8,334,267. The costs incurred by the PO amount to EUR 2,312,523, of which EUR 1,369,266 are certified. The condition is met that the maximum level of funding for infrastructure and equipment does not exceed 50% of all eligible costs of the programme.

**The amount of financial assistance provided under the EEA FM can be assessed as significant, corresponding to the set programme objectives and the needs of the target groups.** This assistance complements the existing external funding provided primarily by the European Structural and Investment Fund (ESIF 2014-2020) through the EU operational programmes "Science and Education for Smart Growth", "Human Resources Development", "Regions in Growth", "Rural Development". The funding through the Bulgarian-Swiss Cooperation Programme in the total amount of 76 million Swiss francs in priority areas for the country (including the inclusion of vulnerable groups) is also taken into consideration. However, this programme ended its implementation on December 7, 2019.

According to the PO, at the time of the evaluation contracts are being implemented for about 50% of the funds intended for financing projects under the programme. The remaining 50% of the funds are expected to be agreed by the middle of next year.

**The financial resources allocated for the implementation of specific projects are also assessed as sufficient to achieve the expected results.** There is an increased interest in some of the funded initiatives, however the number of supported projects is limited. For example, the PO registered great interest in the call for project proposals for the construction of new youth centres. Altogether 14 municipalities submitted project proposals, of which only four were approved. Relocating additional financial resources would provide an opportunity to support additional good projects for the construction of youth centres in other municipalities that express a desire and demonstrate readiness for this.

* 1. ***Risks for the implementation of the programme***

Based on its experience from the previous implementation of the programme and from the previous programming period 2009-2014 of the EEA FM and the NFM, the PO identified several main risks that could affect the programme and the extent to which the expected results will be achieved, as well as accompanying mitigation measures:

a) **In the online interview, the PO identified as a serious risk for the attainment of the goals and expected results the long-term emergency due to the ongoing Covid-19 pandemic.** It is difficult to organize events, personal contacts, site visits, planned trips in the country and abroad, meetings with international partners, exchange of experience and the establishment of bilateral partnerships. Working in an online environment reduces these risks, but does not eliminate them completely, and some of the planned activities are postponed. In addition, some social institutions limit both the admission of new clients and the number and content of social and health services offered, which may affect the activities of home care centres, the recovery centre for children with oncohematological diseases and youth centres.

b) **Political instability and the upcoming parliamentary and presidential elections in 2021.** This can lead to changes in the Programme management team and delays in the implementation of the programme. For example, the restructuring of the administrative structure in which the PO is located (Directorate General for Structural Funds and International Educational Programmes) may cause problems in its activities. The PO has experience in dealing with challenges arising from government changes and can reduce this risk by relocating responsibilities to ensure strict compliance with the Management and Control Systems. The Ministry of Education and Science has set up a special unit (External European Programmes Directorate) to manage EEA grant programmes. This is considered a good practice for programme management, creating sustainability and adaptability, guaranteed by the acquired professional experience, knowledge and skills of the experts in this Directorate.

c) **Insufficient administrative and project management capacity in small municipalities.** This risk can be mitigated by training and support by the PO of the beneficiaries in the process of application and implementation of projects. It is also possible to select projects in several stages (for example, initial application in the form of conceptual ideas and subsequent development into complete project proposals). In addition, the PO can provide ongoing support and monitoring to project organizers during project implementation.

d) **Risk of failure to achieve the expected results of bilateral activities and failure to establish a sufficient number of bilateral partnerships.** With the help of the DPP, the PO can mitigate this risk by organizing bilateral matchmaking events, in presence and online.

**In the Strategic Report for the period 01.08.2019 - 31.07.2020[[1]](#footnote-1) the NFP identifies other specific risks related to the management of the programme:**

* Insufficient number of projects to achieve the goal of Roma inclusion. It is recommended to hold thematic meetings on Roma issues with the participation of all stakeholders at least twice a year. In order to reach the maximum coverage of the target group, the PO must use appropriate communication channels, conduct advertising and information campaigns that raise public awareness, promote socio-economic activities and help develop intercultural dialogue.
* Delay in the coordination of the Guidelines for applicants for Calls for Proposals with all stakeholders to ensure their compliance with the strategic priorities. The NFP will not approve draft calls for proposals if they are not agreed with the relevant stakeholders responsible for the development and implementation of policies in the areas of the interventions.
* Delays in the programming and implementation of integrated measures for Roma Inclusion and Empowerment due to unwillingness to carry out this type of activity and insufficient political will (sometimes justified by the danger of escalating ethnic intolerance and various forms of protest against the implemented integration measures), as well as due to limited participation of the Roma in the overall process of preparation and implementation of measures in this area.
* Delay in the programming of the call for project proposals *Early Childhood Development and Care*. The draft amendment to the Programme Agreement was returned to the PO with a request for consultation with the Cooperation Committee, additional analytical information on compliance with the needs at national level and supplementation with other financial instruments. In response to these recommendations, the draft Guidelines for applicants for the Call for Proposals *Improving the Conditions of Education and Care for Children aged 3 to 6 years* were published by the PO for public discussion. A "round table" was organized with experts from the state administration, municipalities and non-governmental organizations working in the field of early childhood development and education. Upon taking into account the received recommendations, the project was sent for consideration to the NFP and the FM Office.
* Delays in the launching of the activities for modification of the cancelled project “INCLUDE”. The PO has taken action to ensure the achievement of the most important objectives of the cancelled project and a concept is being prepared for a new project aimed at building capacity for educational and social inclusion, to be developed by the Ministry of Education and Science with the Centre for Educational Integration of Children and Students from Ethnic Minorities (CEICSEM) as the project promoter and Sofia university as a project partner. The NFP requests further consultations with the Cooperation Committee and the FM Office, which have been held. The new concept of PDP, which is in the process of internal coordination in the Ministry of Education and Science, is to be included in the next amendment of the Programme Agreement in order to ensure the achievement of the project objectives, which is related to the implementation of other programme initiatives.

**The Monitoring Report for 2019[[2]](#footnote-2) also identifies a number of risks associated with activities for improved social inclusion of the Roma:**

1. PO’s limited capacity to manage the attainment of significant results in relation to Roma inclusion (content management);

2. Lack of provisions for effective participation of the Roma in the development, implementation, activities and monitoring of the programme;

3. Lack of capacity at the municipal level to develop effective Roma inclusion projects based on integrated approaches and active participation of Roma communities.

1. **Roma focus of the Programme**

**This section presents the results of the analysis of several key issues related to the goal of improved Roma inclusion:**

* To what extent are the objectives for ensuring Roma focus under the *Local Development, Poverty Reduction and Improved Inclusion of Vulnerable Groups* Programme being met?
* Is compliance with the national policies for Roma integration ensured (National Strategy of the Republic of Bulgaria for Roma Integration 2012-2020; National Action Plan for the period 2015-2020 for implementation of the National Strategy of the Republic of Bulgaria for Roma integration 2012-2020)?
* How is the territorial scope of implementation chosen and how are the measures focused on the needs of the target group?
* Does the consultation process correspond to the requirements of the financial support schemes and the needs of the target group?
* To what extent is there complementarity and synergy with other projects and programmes, as well as upgrade of results related to the Roma focus under the EEA FM from the previous programming period (2009 - 2014):
* in the implementation of integrated measures for local development and poverty reduction through education, employment and healthcare (including initiatives aimed at the health needs of vulnerable groups);
* how the experience of identical procedures at the national level and foreign practices has been used;
* what type of monitoring is envisaged: reporting on the participation of the Roma (as a number of Roma participants) in the implementation of the activities or how their participation has contributed to a real change in the impact of the projects and the Programme.
	1. ***Fulfilment of the objectives for the Roma focus of the programme***

The *Local Development, Poverty Reduction and Improved Inclusion of Vulnerable Groups* Programme is the main programme of the EEA FM, which provides for a diverse set of measures that can contribute to the social inclusion and empowerment of the Roma. This priority is clearly outlined in both the Memorandum of Understanding and the Programme Agreement. The amount allocated for the inclusion of the Roma under the programme according to the “Plan for the Roma” prepared by the NFP is EUR 9,155,130. This is about half of the total EUR 18 million of the EEA FM grants (2014-2024) aimed at achieving the goal "Enhanced Roma Inclusion and Empowerment". However, it seems that the implementation of this goal, the declared focus on it notwithstanding, remains underestimated. After the elimination of the redefined project *Capacity Building for Inclusion in Bulgaria* (INCLUDE), only two initiatives are aimed directly at achieving this goal:

* PDP 6, addressing the insufficient data on the situation of the Roma, which is a serious obstacle to the formulation, implementation and monitoring of inclusion policies;
* Open call for proposals for integrated approaches and measures to support municipalities with large Roma communities in both urban and rural areas through the development and implementation of projects increasing access to education, adequate social services, healthcare, employment and others problems of equal rights of the Roma.

It is not explicated how the Roma will be involved in the project activities and how this will lead to their empowerment, except that they will be beneficiaries of both initiatives. Despite the importance and expediency of the PDP 6, it does not directly address the most significant problems of the Roma community and their social inclusion. It can be assumed that by providing disaggregated data on hard-to-reach groups at risk of violation of their rights, the project will contribute to more adequate Roma inclusion policies, more effective monitoring and evaluation of their implementation. Indirectly, this will help to improve the situation of the Roma in the long run. At the same time, towards the end of the period of mid-term evaluation (June 30,2020) the call for project proposals for integrated measures has not yet been announced, which creates a risk for the attainment of the expected results.

Two more programme initiatives are relevant to the goal of social inclusion and empowerment of the Roma:

The first one is the open call for proposals for *Improving the conditions for education and care for children aged 3 to 6 years*, aimed primarily at settlements and groups in a disadvantage position. It envisages that at least 10% of the children involved in the activities of the funded projects will be from vulnerable groups (including Roma) and implemented primarily in remote, rural and poor areas with a high share of Roma population and dropouts.

The second one is an open call for project proposals for the creation of new youth centres. The activities of the youth centres aim at engaging, empowering and guiding young people by providing services and advice for training and work, as well as organizing events to raise awareness of human rights and democratic values and principles. The youth centres established in the previous programming period already have significant experience in working in areas with a high share of vulnerable groups (including Roma). The centres continue to operate in settlements with Roma students who have dropped out of the formal education system. There are also many activities in an informal environment that strengthen students' achievements and help their reintegration.

PDP 2 *Innovative models of community care for people with chronic diseases and permanent disabilities* also has a plan for Roma participation. They are involved in the project both as beneficiaries and as professional staff (Roma nurses and home assistants), which will help to better connect with Roma beneficiaries and to improve Roma access to innovative health services.

Both PDP 1 *Growth through Activating Local Potential* (GALOP), which develops sustainable models for local development in disadvantaged municipalities, and the SGS (which aims at enhancing local development by supporting innovative approaches to job creation and application of innovative approaches to stimulate economic development) are not perceived as directly related to the Roma but can contribute to improving their socio-economic situation. However, the Roma are usually seen as a problem and not as a resource with a potential for local development. Nevertheless, activities in all three programme areas will contribute, albeit to varying degrees, to combating Roma exclusion and discrimination along with other vulnerable groups

As mentioned in the previous section, the Monitoring Report for 2019[[3]](#footnote-3) identifies several risks in relation to the goal of improved social inclusion of Roma. In response to these risks, the NFP has been taking action to start preparing and launching an integrated Roma inclusion and empowerment scheme as early as possible. The NFP recommends that the PO presents an action plan with several substantive components:

* an approach for more focused measures in municipalities facing Roma integration problems (without waiting for the results of the NSI-implemented PDP 6 ***“****Novel Approaches to Generating Data on Hard-to-reach Populations at Risk of Violation of their Rights*”);
* drawing on external experience for the design of the call for project proposals;
* needs assessment with the participation of the Roma;
* measures to build the capacity of municipalities to develop effective projects for Roma inclusion, based on integrated approaches and active participation of Roma communities.

In response to these recommendations, the PO organized a public discussion of the main provisions of the Guidelines for Applicants for the forthcoming call for proposals for integrated measures to improve access to education, employment, social and healthcare and services. At the beginning of December 2020, a "round table" was held to discuss the proposals for Guidelines for application and selection of integrated projects in support of Roma inclusion (published on November 18, 2020). The “round table” was attended by representatives of the PO, the NFP, state institutions, and non-governmental organizations working in the field of Roma inclusion.

* 1. ***Programme consistency with the national policies for Roma integration and synergy with other projects and programmes with Roma focus***

**The proposed initiatives and measures under the *Local Development, Poverty Reduction and Improved Inclusion of Vulnerable Groups* Programme are generally in line with the National Strategy of the Republic of Bulgaria for Roma Integration 2012-2020 (NSRBRI), with the National Action Plan for the period 2015-2020 for implementation of the NSRBRI and with the Framework Programme for Integration of the Roma in the Bulgarian Society (2010-2020).** This is particularly true of the need for integrated approaches to tackling access to education, jobs, social services and other rights.

The NSRBRI does not prioritize the various areas and measures addressing the issues of access to basic rights and services (education, employment, social and health services, housing, etc.). However, the government's main priority seems to be education since it is considered an investment in preventing Roma exclusion in the long run. There are various programmes (including the ESIF) for access to pre-school education, enrolment in the first grade, reduction of school dropouts, training of educational mediators, which are explicitly mentioned in the NSRBRI. The priorities of the *Local Development, Poverty Reduction and Improved Involvement of Vulnerable Groups* Programme are also rather oriented towards access to education. The improvement of the educational achievements of Roma students and positive measures to increase access to university education seem to be underplayed given the fact that they are not among the Programme’s priorities. The access of the Roma to employment through the SGS for job creation and as part of the integrated projects of the municipalities is also addressed. Measures related to access to housing, which require greater investment and are expected to be financed by EU structural funds, are not envisaged.

In accordance with the national policy for social inclusion and integration of the Roma, all initiatives and projects of the programme envisage special activities aimed at supporting disadvantaged areas. The Bulgarian Red Cross project for the provision of care and assistance for the elderly is being implemented in the North-West region, one of the poorest regions in the EU with a high percentage of Roma population. This is one of the mandatory requirements in the Guidelines for Applicants, which is monitored by the PO and the NFP.

The procedure for establishing new youth centres also emphasizes the importance of working with vulnerable groups of young people in disadvantaged municipalities and municipalities with a higher share of the Roma population. The Guidelines for applicants explicitly require 20% of young people involved in the activities of youth centres to be from vulnerable groups (including Roma). As a result of the already completed selection and evaluation procedure, new youth centres will be established in regions with a large share of young people at risk, incl. Roma (projects proposals of the municipalities of Burgas, Montana, Pernik and Gabrovo have been approved).

**The goals and activities of the *Local Development, Poverty Reduction and Improved Inclusion of Vulnerable Groups* Programme build on the results of the Roma focus of the EEA FM from the previous programming period (2009-2014). The programme is in line with the financial support provided by the ESIF under the various operational programmes.** The analysis reveals that ESIF's existing operational programmes also support measures related to youth centres, access to education, and integrated approaches at local level. Rather, the evaluated programme complements these programmes, with the NFP being careful to avoid overlapping activities and funding.

**The planned scheme for providing financial support for integrated local development measures is focused on one of the most urgent needs for finding grass-root working solutions for social inclusion and empowerment of the Roma.** It is related to the NSRBRI horizontal priority for the implementation of an integrated territorial approach, allowing the simultaneous undertaking of complex measures in a certain municipality or settlement and pooling of resources under different priorities while considering specific local needs, especially the needs of disadvantaged people, to achieve visible changes in individual settlements/neighbourhoods. If well designed, this component of the programme can create and test good practices that address many priorities in an integrated way – education, job creation, access to social and health services, and more. It can also contribute to another aspect mentioned in the NSRBRI - building of civil society structures and participation in municipal planning and implementing the relevant measures for Roma inclusion.

* 1. ***Consultative process and involvement of Roma organizations in the planning and implementation of the programme***

**The NFP and the PO strive to establish good cooperation with various representatives of Roma civil society.** Roma NGOs actively participated in the stakeholder consultation meeting on Roma-focused programmes, held on May 25, 2017. The proposals made by Roma NGOs for specific measures are also reflected in the Concept Notes of the respective programmes, and in some cases, they are fully included (for example in the *Justice* Programme).

Specifically, the *Local Development, Poverty Reduction and Improved Inclusion of Vulnerable Groups* Programme includes some of the proposals of NGOs for the approach to education in a multicultural environment, expanding the capacity of teaching staff and access to pre-school education. Other proposals from Roma NGOs have not been taken into account. This is, for instance, the case with the idea to increase Roma participation as a critical factor in expanding the capacity of local and regional authorities by creating local structures for cooperation, consultation and monitoring with at least 1/3 of representatives of the local Roma community, Roma experts and organizations, as well as the provision of resources to facilitate dialogue and joint action of institutions and Roma community representatives. Other proposals, which are also not reflected in the programme, concern activities towards the empowerment of Roma women, which will require special attention and well-thought-out community interventions (to overcome school dropouts due to traditional values and early marriages, increase their access to health, work and support for their more active participation in social life, etc.). The participation of the Roma is envisaged mainly as participation in the activities for which they will be beneficiaries, rather than in the design and implementation of projects.

A good example of involving representatives of the Roma community in the consultation process is the roundtable organized in December 2019 by the NFP in partnership with the FMO “Measures for Roma Integration under the EEA FM and NFM 2014-2021 – implementation challenges, monitoring strategies, active inclusion and empowerment of Roma – exchange of experience and good practices”. The round table is attended by more than 120 representatives of key stakeholders involved in Roma inclusion at national and European level, including Roma and pro-Roma civil society organizations, municipalities, programme operators, project organizers, international partner organizations, DG Justice of the EU Commission, Council of Europe, EU Agency for Fundamental Rights, ESIF governing bodies, related ministries, National Association of Municipalities in the Republic of Bulgaria, Commission for Protection against Discrimination, etc. The round table provided a platform for sharing experiences and good practices regarding social inclusion and the empowerment of the Roma.

The call for proposals for integrated projects of municipalities has great potential to improve the situation of local Roma communities by increasing their access to quality services and rights. Its implementation depends both on the political will of the municipalities to deal with the problems of Roma inclusion, and on their strategic and technical capacity to adequately address the complex challenges of the social exclusion of the Roma. In its current form, in the call for proposals for integrated projects only municipalities are posited as an eligible applicant. Moreover, the need for partnership with local Roma communities and NGOs as equal partners in the design and implementation process is not explicitly stated. If the Roma remain only passive beneficiaries of the services planned under these projects, there is a risk their impact and sustainability to be reduced.

In regard to the forthcoming announcement of the call for projects for *Integrated measures in support of Roma inclusion* and due to the great public interest in it, the PO published for public discussion a draft Application Guidelines. The design of the Guidelines was consulted with Roma organizations – National Coalition "Intellect" and Foundation for Health and Social Development (Hesed). On this occasion, the PO initiated a round table discussion, held on December 2, 2020 in the form of a video discussion due to the stricter anti-epidemic measures introduced at the end of November 2020. It is attended by representatives of state institutions and non-governmental organizations working in the field of Roma inclusion, including: Commission for Protection against Discrimination, Centre for Educational Integration of Children and Students from Ethnic Minorities (CEICSEM), Centre for the Study of Democracy, Open Society Institute – Sofia, Krida Consulting Ltd., Health and Social Development Foundation (Hesed), World Without Borders Association, Integro Association, Permanent Roma Conference – Southeast, Social Alternative Trust Foundation, Roma Foundation – Lom, Leader Association, Active Citizens Fund, Roma Yuoth Club – Stolipinovo, and others.

The PO intends to ensure the inclusion of Roma NGOs and activists in the overall process of planning, implementing and reporting on the projects supported under the integrated scheme through focus groups and regular workshops. At the same time, based on experience with EU structural funds, the presence of a Roma NGO as a partner is not always a guarantee for the active participation of Roma communities. It is important for this partner to be able to mobilize Roma effective involvement in the implemented projects. There are some good practices and initiatives related to community-based structures that can be explored and implemented. Examples of this are the self-help groups of Roma women in the most marginalized Roma neighbourhoods (supported by the association of more than 150 Roma health mediators); setting up civic development committees that mobilize the participation of community members, express their needs and concerns to the authorities and seek their solutions; establishing community action groups to facilitate the planning of Roma participation based on people's real needs and project development (ROMACT) and others.

* 1. ***Risks of not achieving the goal of Roma inclusion and empowerment***

**Some aspects of the socio-political context in Bulgaria may negatively affect the effectiveness of the implementation of the national policy framework for Roma inclusion and the achievement of the goal of the *Local development, poverty reduction and improved inclusion of vulnerable groups* Programme for social inclusion and empowerment of the Roma.** The Roma issue is largely politicized, and anti-Roma sentiments are generated, especially in an election situation, which sometimes lead to anti-Roma protests in various settlements and even to crimes of ethnic hate. The public debate is increasingly dominated by proposals for the “integration” of the Roma through strict administrative and penal approaches, which form a negative public opinion towards the Roma.

A serious challenge is the future of the NSRBRI, which expires in 2020. The consultation process for the development of a new strategy began in 2019, but there is a risk that the case of non-adoption of the Strategy for the Rights of the Child will be repeated. Another problem is the capacity of the National Council for Cooperation on Ethnic and Integration Issues (NCCEII) for political coordination and monitoring of the Roma Strategy implementation. This Council has the task of coordinating policies and monitoring the implementation of the NSRBRI. The NFP seeks to compensate for deficits in the NCCEII 's capacity for effective policy coordination by maintaining regular ongoing contacts with representatives of active Roma NGOs, as well as by initiating meetings between experts from the various state institutions responsible for implementing Roma inclusion programmes, supported by various financial instruments (such as the ESIF and the Swiss Agency for Development and Cooperation).

**The identified problems in the political and social context represent a challenge for all programmes aimed at Roma inclusion, including the *Local Development, Poverty Reduction and Improved Inclusion of Vulnerable Groups* Programme.** Theprogramme and project teams have good professional skills to ensure effective management of financial instruments. However, knowledge of approaches to both Roma inclusion and attainment of significant and sustainable results are still insufficient. This necessitates an increase in the capacity for effective programming and project management in the field of social inclusion and empowerment of the Roma through training, exchange of experience with other countries, establishment of advisory groups of experts with the participation of Roma representatives.

The Monitoring Report for 2019[[4]](#footnote-4) concludes that the capacity of municipalities to design adequate and meaningful integrated interventions is low. Municipal projects are well developed technically, but without a real understanding and focus on sustainable social change in the situation of Roma communities. Therefore, the way of preparing these projects and the degree of involvement of the local Roma communities in it is crucial for Roma empowerment.

***Appendix 1.*** ***Summary of the "Local development, poverty reduction and improved inclusion of vulnerable groups" Programme***

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Programme Area** | **Тип** | **Project** | **Promoter** | **Partner/s** | **Budget (EURO)** |
| **1. Increased social and economic development in disadvantaged municipalities** | 1.1. Pre-defined project 1 | Grow through Activating Local Potential” (GALOP) | National Association of Municipalities of the Republic of Bulgaria | Norwegian Association of Local and Regional Authorities | 1 200 000 |
| 1.2. Pre-defined project 2 | Innovative Community Care Models in Favour of People with Chronic Diseases and Permanent Disabilities | Bulgarian Red Cross | Ministry of Labour and Social Policy, Ministry of Health Lindas Kommune - Norway | 3 333 333 |
| 1.3. Pre-defined project 3 | Recovery Centre for Children with Oncohematological Diseases | Kostinbrod Municipality | - | 625 822 |
| 1.4. Pre-defined project 4 | Pre-feasibility Study for the Development of National Paediatric Hospital in Bulgaria | Ministry of Health | - | 500 000 |
| 1.5. Small Grant Scheme (SGS) | Job creation (supporting local development by supporting innovative approaches to strengthen economic activities and job creation in target areas) |  |  | 4 000 000 |
| 1.6. A restricted call for project proposals  | Local development and expansion of existing youth centres ("Youth centres: a powerful factor for local development") | Four Youth Centres – in Stara Zagora, Plovdiv, Dobrich and Vratsa [[5]](#footnote-5) |  | 4 000 000 |

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **2. Improved social inclusion of children and youth** | 2.1. Pre-defined Project 5 | INCLUDE – Building Capacity for Inclusion in Bulgaria | Council of Europe | Ministry of Education and Science | 2 000 000 |
| 2.2. Call for project proposals | Early child development and care |  |  | 6 029 412 |
| 2.3. Call for project proposals | Establishing new youth centres |  |  | 8 000 000 |
| **3. Improved Roma inclusion** | 3.1. Pre-defined Project 6 | Novel Approaches to Generating Data on Hard-to-reach Populations at Risk of Violation of Their Rights | National Statistical Institute | EU Fundamental Rights Agency | 1 000 000 |
| 3.2. Call for project proposals | Integrated measuresSupport for integrated projects to improve access to education, employment, social and health care and services |  |  | 8 000 000 |

## 3.2 Analysis and evaluation of the implementation of the *Renewable Energy, Energy Efficiency, Energy Security* Programme

The analysis and evaluation of the implementation of the *Renewable energy, energy efficiency, energy security* Programme are in line with the general objective to carry out an interim evaluation of the implementation of the programmes financed under the EEA FM and NFM 2014-2021.

The **specific objectives** of the evaluation of the *Renewable energy, energy efficiency, energy security* Programme are:

* To assess the progress in the implementation of the Programme based on the analysis and evaluation of its objectives, results and products that are expected to be realized from the implementation of the funded interventions/projects;
* To assess the expediency, effectiveness and efficiency of the implementation of the *Renewable energy, energy efficiency, energy security* Programme, taking into account its specific target groups and specific objectives;
* To evaluate the achieved results of the interventions under the *Renewable energy, energy efficiency, energy security* Programme, as well as the probability of achieving or the risk of not achieving the planned results under the individual programmes;
* To assess identified problems and good practices (strengths and weaknesses) from the implementation of the *Renewable energy, energy efficiency, energy security* Programme, as well as to formulate suggestions aimed at overcoming the identified problems and to offer recommendations that can serve in the process of making informed management decisions.

The evaluation is based on the progress in the implementation of the *Renewable energy, energy efficiency, energy security* Programme for the period from the signing of the Programme Agreement between the National Coordination Unit (National Focal Pont/NGP) and the EEA FM Office until 30 June 2020 and evaluated the possibility for achieving the set goals and results within the deadline for implementation of the projects – April 30, 2024.

The Ministry of Energy has been designated as the Programme Operator (PO) of the *Renewable Energy, Energy Efficiency, Energy Security* Programme, and the Donor Programme Partners (DPPs) are the Norwegian Water Resources and Energy Directorate (NVE), and the National Energy Authority of Iceland (OS).

**1. Objectives, design, and coordination of the programme**

In this section, the *Renewable energy, energy efficiency, energy security* Programme is analysed in relation to the following key evaluation issues:

* To what extent are the priorities, the selected interventions and the applied approach (eligible activities, costs, beneficiaries, etc.) appropriate and correspond to the needs, problems and limitations of the target groups of the programme?
* To what extent does the programme's interventions complement the support provided under other programmes and financial instruments (in particular ESIF funding and other EU-funded programmes)?
* What is the link and synergy between the programme and the measures implemented under other programmes in order to achieve the national and pan-European goals for economic development and social cohesion?

***1.1 Objectives of the programme and compliance with the needs of the target groups***

The main goals of the *Renewable energy, energy efficiency, energy security* Programme are the reduction of carbon intensity and increase security of supply, and these goals are expected to be achieved through the following three outcomes:

* Outcome 1: Increased renewable energy production.
* Outcome 2: Improved energy efficiency in buildings, industry and municipalities.
* Outcome 3: Strengthened expert capacity for renewable energy, energy efficiency and energy management.

The *Renewable energy, energy efficiency, energy security* Programme is aimed at increasing the production of energy from renewable sources, improving energy efficiency, and strengthening the expertise in the field of renewable energy, energy efficiency and energy management, which are directly related with the objectives of the Europe 2020 Strategy. In regard to climate and energy, the objectives are to achieve the national targets of a 16% share of energy from renewable sources (RES) in gross final energy consumption, to increase energy efficiency by 25% and to prevent increases in greenhouse gas (GHG) levels beyond the scope of the EU ETS[[6]](#footnote-6)by more than 20% by 2020.

During the programme elaboration, experience from the implementation of the programmes and projects supported by the FM of the EEA and the NFM in the period 2009-2014 has been taken into consideration and in particular the experience of the PO related to outcomes 1 and 2 of the previous programming period of EEA FM and NFM under the BG04 *Energy Efficiency and Renewable Energy* Programme.

In connection with the evaluation of programme goals and priorities, information was collected on several main topics:

1. Correspondence of programme goals and priorities with the problems and needs of the target groups;

2. Adequacy and feasibility of the objectives, approach and activities of the programme;

3. Suggestions for changing/supplementing the goals and activities of the programme.

**The goals and priorities of the programme can be assessed as adequate to the needs and problems of its target groups.**

***1.2 Projects and expected results***

Based on the Memorandum of Understanding and in line to Art. 6.2 of the Regulation, a concept has been developed, defining the scope and planned results of the programme. Stakeholder consultations were held with the participation of representatives of municipalities, associations and unions representing Bulgarian industry, organizations working in the field of energy efficiency, renewable sources, environmental protection and biodiversity, scientific and government institutions. The programme is implemented through a set of predefined projects (PDPs), calls for proposals and small grant schemes (SGS), contributing to the achievement of the objectives and expected results of the programme, as follows:

**Outcome 1. *Increased renewable energy production*** is supported through:

* The procedure for the selection of project proposals 1: Efficient use of the hydropower potential, with a total budget of EUR 3,500,000.
* The procedure for the selection of project proposals 2: Geothermal energy (heating/cooling) in buildings and industry, with a total budget of EUR 3,400,000.
* Small grant scheme (SGS) 1: Geothermal energy training, with a total budget of EUR 200,000.
* PDP 1: Feasibility study on utilizing the hydro power potential in existing water supply systems and upgrading potential for existing small scale hydro power plants in water supply systems, with the Agency for Sustainable Energy Development as the project promoter, and a total budget of EUR 350,000.
* PDP 2: System for forecasts, control and management of hydropower generation and dams condition, with the National Electric Company EAD as the project promoter and a total budget of EUR 2,470,000, of which 50% is a grant.

**Outcome 2. *Improved energy efficiency in buildings, industry and municipalities***  is supported through:

* The procedure for the selection of project proposals 3: Energy efficiency in buildings, with a total budget of EUR 10,700,000.
* The procedure for the selection of project proposals 4: Energy efficiency in industry, with a total budget of EUR 2,500,000.
* The procedure for the selection of project proposals 5: Rehabilitation and modernization of municipal infrastructure, with a total budget of 8,200,000 euros.

**Outcome 3**. ***Strengthened expert capacity for renewable energy, energy efficiency and energy management*** is supported through:

* Small grant scheme 2: Training for renewable energy, energy efficiency and energy management, with a total budget of EUR 388,529.
* Small grant scheme 3: Monitoring of energy consumption of municipal authorities, with a total budget of EUR 550,000.

In order to strengthen the bilateral cooperation with the DPPs, the programme disposes of a financial resource amounting to EUR 100,000 under the Bilateral Relations Fund.

***1.3 Programme coordination/synergy***

An important aspect of the evaluation is the complementarity between the evaluated programme and the measures implemented under other programmes with a view to achieving the national and pan-European goals for economic development and social cohesion. The programme corresponds and is developed in accordance with the main national strategic and legal documents:

The main document of the national energy policy of the Republic of Bulgaria is the Energy Strategy. It has been approved by the Council of Ministers and adopted by the National Assembly of the Republic of Bulgaria. The Energy strategy of the Republic of Bulgaria until 2020 was adopted on the basis of Art. 3, para. 2 of the Energy Act, promulgated, SG, is. 43 of June 7, 2011, supplemented, no. 101 of December 7, 2018. The document expresses the political vision for the sector in the context of the current European framework of energy policy and global trends in the development of energy technologies. The main priorities in the Energy Strategy are the following:

* Ensuring security of energy supply.
* Achieving the goals for renewable energy.
* Increasing energy efficiency.
* Development of a competitive energy market and a policy aimed at meeting energy needs.
* Protection of consumer interests.

The priorities determine the development of the energy sector in the coming years in the following directions:

* Maintaining a secure, stable, and reliable energy system.
* Energy remains a leading sector of the Bulgarian economy with a clear foreign trade orientation.
* Emphasis on clean and low-emission energy – nuclear and from renewable sources.
* Balance of quantity, quality and prices of electricity produced from renewable sources, nuclear energy, coal and natural gas.
* Transparent, efficient and highly professional management of energy companies.

The national legislation governing the issues of renewable energy, energy efficiency, energy security includes a number of laws and regulations, which are presented in Annex 2 to the report.

The programme is implemented in accordance with the following agreements:

1. Agreement between the European Union and Iceland, the Principality of Liechtenstein and The Kingdom of Norway concerning the EEA FM 2014-2021.

* Protocol 38C to the Agreement on the EEA Financial Mechanism 2014-2021 to the Agreement between the European Union, Iceland, the Principality of Liechtenstein and the Kingdom of Norway on the EEA Financial Mechanism 2014-2021;
* Regulation on the implementation of the EEA Financial Mechanism 2014 - 2021.
* Memorandum of Understanding on the implementation of the EEA Financial Mechanism 2014-2021 between the Republic of Bulgaria and Iceland, the Principality of Liechtenstein and the Kingdom of Norway, signed on December 9, 2016, ratified by law adopted by the 43rd National Assembly on January 13, 2017 (published in Sate Gazette No. 8/2017);

2. The Programme Agreement between the Committee of the Financial Mechanism and the Central Coordination Unit Directorate (National Focal Point/NFP) within the Council of Ministers of the Republic of Bulgaria for the financing of the *Renewable energy, energy efficiency, energy security* Programme, signed on June 21, 2018.

3. Agreement for the implementation of the *Renewable energy, energy efficiency, energy security* Programme between the NFP and the Ministry of Energy, signed on July 27, 2018.

4. Agreement on the implementation of the Bilateral Relations Fund signed on September 29, 2017 and the Guide for Bilateral Relations, the EEA FM, and the Norwegian Financial Mechanism 2014-2021 of the FM Committee.

The Programme also corresponds to the law of the European Union in the following areas:

* The law in the field of state aid (regulations, decisions, directives, etc.).
* Guidelines for determining the financial corrections made to EU-funded expenditure under shared management as well as to the corresponding national funding in the event of non-compliance with the procurement rules adopted by Decision C (2019) 3452 of May 14, 2019, taking into account the specifics of the Regulation for the implementation of the EEA FM and NFM.

**The *Renewable energy, energy efficiency, energy security* Programme is implemented in accordance with the listed strategic and regulatory acts and documents.**

Based on the analysis of the objectives, design and coordination of the *Renewable Energy, Energy Efficiency, Energy Security* Programme the following **assertions** can be made:

First, during the in-depth online interview with representatives of the PO, it was noted that the experience of the previous programming period was used in the programming of the current programming period, as well as the strategic policy goals in the energy sector. The Ministry of Oil and Energy of the Kingdom of Norway and the National Energy Authority of Iceland are perceived as very good and reliable partners who the PO would like to keep in the long run. The PO noted that extensive talks have been held with a wide range of stakeholders on the priorities and prospects of the Bulgarian energy sector.

As a result of the exchange of information, already in the previous programming period the idea for the first pre-defined project aimed at assessing the hydro potential in the water supply and sewerage sector was formulated. It has already been contracted and is being worked upon, including verification of the funds used. In the first phase of the project, there was a more modest interest from water companies in providing information, which can be attributed to the ongoing reform in the sector. Subsequently, 15 water companies showed interest and on-site visits were attended by representatives of the Norwegian DPP. According to the PO, **for the first pre-defined project no risks have been identified, no problems are expected in its implementation, and the activities will be completed on time**. It is pointed out that about EUR 170-180 thousand have been saved and the PO plans to make a proposal to reallocate them to other measures.

Second, according to the Programme Agreement the second pre-defined project, which is aimed at the National Electricity Company, does not include a DPP. However, various possibilities for cooperation have been discussed. By the end of January 2021, it is expected that the Guidelines for the forthcoming call will be prepared and subsequently a procedure for collecting project proposals will be launched. It is stipulated in the Programme Agreement that an external institution should be selected to carry out an independent project evaluation, which is planned for early 2021. It is expected that there will be no delay, as the procedure is not within the scope of large orders under the Public Procurement Act.

Third, the PO points out that there is synergy and differentiation with other programmes operating in the field of energy and energy efficiency. Meetings and seminars were held both in Bulgaria and in Norway, where opportunities were created to establish partnerships between the municipalities in Bulgaria and the Norwegian, Icelandic, Liechtenstein, and Bulgarian businesses. This builds on the positive results achieved in the previous programming period, and so far, the goal of re-establishing a significant number of partnerships has been achieved.

Norwegian Water Resources and Energy Directorate (NVE), and the National Energy Authority of Iceland (OS).

Fourth, according to the DDPs of the *Renewable Energy, Energy Efficiency, Energy Security* Programme (the Norwegian Water Resources and Energy Directorate (NVE) and the National Energy Authority of Iceland), **the objectives and priorities of the programme are relevant to the problems and needs of target groups and no proposals are made for changes in them**. They are in line with the EU regulatory framework and its goals for increasing energy efficiency, as well as with Bulgaria's national priorities in the field of energy and climate change. The deliberately applied "bottom-up" approach in the process of Programme elaboration entailed led to the preliminary study of the needs of municipalities, businesses and the population. The Programme is characterized by innovation and supports activities that are not covered by the ESIF operational programmes and have so far been underfunded. There is no other programme that addresses the so-called "Zero buildings" (buildings with close to zero energy consumption), rehabilitation and modernization of outdoor lighting systems in municipalities, and geothermal energy as a renewable source. These initiatives have been discussed and agreed upon with the National Association of Municipalities in the Republic of Bulgaria (NAMRB) and induce substantial interest.

**2. Assessment of the progress, delays, and risks in the implementation of the programme**

In this section, the analysis focuses on the following key evaluation issues:

* What is the progress made (as of June 30, 2020) under the programme in terms of the negotiation and implementation of measures, incl. in terms of achieved results?
* Are there any deviations/delays from the initial programme implementation schedule? What is the reason for this and what is the potential impact of this delay on the successful implementation of the interventions and the achievement of the set results?
* Is there a realistic up-to-date plan for the implementation of the measures under the programme?
* What problems have been identified in terms of: project design and programming of interventions, selection of project proposals, contracting, monitoring, and reporting, financial control and payment, prevention systems, risk management systems, registration and reporting of irregularities, procedures on monitoring, evaluation and reporting on the implementation of the programme, information and communication measures, etc.?

***2.1 Programme implementation status***

**In the period until June 30, 2021, moderate progress has been made in the implementation of the Programme**. The framework for programme management has been developed and the distribution of tasks and responsibilities has been finalized. Two calls for project proposals have been announced:

First, for the pre-defined project "Feasibility study on utilising the hydro power potential in existing water supply systems and upgrading potential for existing small hydro power plants" (PDP 1). The call was launched on November 15, 2019, and the project proposal was submitted on December 6. Following the evaluation of the project, a grant agreement was signed on June 15, 2020 with duration of 12 months. The projects promoter is the Agency for Sustainable Energy Development, and the DPP is the Norwegian Water Resources and Energy Directorate (NVE) at the Ministry of Oil and Energy of the Kingdom of Norway, Oslo. Some technical circumstances related to the delivery by mail in Bulgaria of the signed partnership agreement between the project promoter and the DPP (NVE) are indicated as a reason for the delay in concluding the contract for project implementation. Additional information on this project is presented in Annex 2.

Second, an open call "Rehabilitation and modernization of municipal infrastructure – systems for outdoor lighting of municipalities”. The procedure was launched on November 18, 2019. The deadline for submission of the project proposals has been extended by 15 days to March 20, 2020. Altogether 107 applications were received, and this is a substantial success. Of these, 104 projects have passed an administrative evaluation, and the technical and financial evaluation ends at the end of November 2020. A Selection Committee was held on December 9, 2020, and on January 6, 2021 the list of approved projects was officially published.

About 80% of the projects (88 projects) have Norwegian partners. The PO expects the energy efficiency targets to be achieved with the funds provided. The projects envisage energy savings in the range of 50-70%, which shows that the street lighting technologies already on the market are rapidly developing. They will help to significantly reduce the energy costs of municipalities and reduce carbon emissions. The projects approved under this procedure correspond to the main programme priorities, including the European Recovery and Sustainability Plan, which is planned to finance other similar projects. It is in line with other operational programmes. For example, under the Regional Development OP, as well as under the Rural Development Programme, measures related to street lighting are also financed. The aim is to have complementarity from different sources of funding, taking care to avoid double funding.

The position of non-governmental organizations dealing with road safety is also pointed out. They see great potential in the innovations envisaged in street lighting, in the direction of prevention and reduction of road accidents. The donor programme partners also highly appreciate the scheme for rehabilitation and modernization of street lighting and believe that no problems are expected in the implementation of the projects.

The following actions have also been carried out under the *Renewable energy, energy efficiency, energy security* Programme:

* In accordance with the condition for preliminary eligibility, specified in Annex 1 to the Programme Agreement, on June 18, 2020 the PO sent to FMO a detailed description of the activities and budget of PDP 2 “System for forecasts, control and management of HPP generation and dams condition."
* Draft Guidelines for applicants, incl. description of the evaluation criteria for the open procedure for geothermal energy with the municipalities as eligible promoters has been agreed with the members of the Cooperation Committee, FMO and has been approved by the NFP. The draft invitation was also sent to the Ministry of Finance for consultation on the state aid regime. The final draft of the Guidelines for applicants, incl. the administrative criteria, the eligibility, the technical and financial quality criteria are to be provided by the PO to FMO. The PO declares that it is fully prepared for this, and the aim in the preparation of the Guidelines for applicants was not to hinder the municipalities and for them to submit as many project proposals as possible.
* The announcement of the open call 3 for energy efficiency in public buildings is planned in the first quarter of 2021. Consultations have already started with experts from the programming unit, NAMRB, ECO Energy, the Chamber of Builders, the Chamber of Engineers in Investment Design, and other stakeholders. Innovative proposals are expected to be received for renovation and modernization of existing buildings in accordance with the criteria for class A buildings with close to zero energy consumption.
* Under the procedure for selection of project proposals 1 "Efficient use of hydropower potential" the call is scheduled for the beginning of 2021. The PO notes that in the previous programming period, support for the hydropower sector had problems with state aid. They are now being addressed with a change in state aid legislation. No serious challenges are expected with this call, as potential applicants have some previous experience (e.g. in the European Structural and Investment Funds).
* The launch of the call for proposals 4 "Energy efficiency in industry" is scheduled after the announcement of the open call 3 for energy efficiency in public buildings. The PO announces first preparatory meetings to identify needs and possible technological solutions. Concerns have been expressed that the upcoming in April 2021 can slow down the process.
* Small grant schemes (2. Training on renewable energy, energy efficiency and energy management and 3. Support for monitoring the energy consumption of municipal administrations) have not started.

Until June 30, 2020. A total of 4 meetings of the Cooperation Committee were held, the last of which - on 24 April 2020 in the form of a video conference via Skype and the DPPs from Norway (NVE) and Iceland (OS) were informed about the measures taken to address the challenges, related to the Kovid-19 pandemic. Due to the impossibility to organize bilateral activities on site, the PO and DPPs have agreed to organize virtual bilateral events, incl. visits to various facilities. The first such event was held in June – a webinar on "Buildings with close to zero energy consumption", organized jointly by the PO and NVE, and was attended by more than 40 participants from Bulgarian municipalities.

***2.2 Changes, delays, and problems in the implementation of the programme***

An amendment to the Programme Agreement for the implementation of the programme has been made in order to meet the new requirements of the EC Decision of May 14, 2019, regulating the guidelines for determining financial corrections of the expenditures financed by the Union for non-compliance with the applicable public procurement rules.

**A general delay in the implementation of the programme has been registered**, caused by the long period of establishment of the management and operational structure, as well as delays in the announcement of calls for applications and project proposals. The PO is making serious efforts to bridge this gap, but some internal procedures of the Ministry of Energy continue to affect the overall effectiveness of the programme.

**According to the DPP of the *Renewable energy, energy efficiency, energy security* Programme, its implementation needs to be accelerated**. DPP assume that employees in the Ministry of Energy are often engaged in other tasks with higher priority. The view expressed is that it is probably necessary to increase powers and delegate more decision-making rights under the programme at lower levels, as this could make the implementation of the programme more effective. However, the DPP believe that the PO will be able to implement the planned activities in a timely manner by the end of the programming period in April 2024. Larger projects in the field of hydro and geothermal energy are of concern, as such large investment projects take a long time for planning, design, issuance of building permits and construction.

**The PO found delays in programming on a monthly basis, but none of them put the implementation of projects at risk, the pandemic situation notwithstanding**. All emerging issues and delays are regularly discussed with the DPP in order to prevent non-compliance with programme deadlines. All calls under the programme are expected to be opened by the end of 2021. According to the PO, there is no risk of excessive load of municipalities and insufficient capacity prepare applications. In addition to the municipalities, business organizations companies are also beneficiaries of the Programme through announcing a call for projects related to energy efficiency. The funds under this call are smaller, but the businesses are not subject to the same limitations of the Public Procurement Act as the municipalities; due to this, the call has been postponed the longest in time.

**No significant problems were identified with the management of the programme, although there are some internal administrative barriers that lead to delays.** Previous monitoring reports commented on the PO's approach to programme implementation, not using existing structures of the Ministry of Energy to manage the programme but creating a new working group with less clarity on responsibilities for various aspects of programme implementation. The NFP also expressed the view that this posed a risk, while acknowledging that the same approach had been used in the previous programming period, when the programme had been successfully implemented despite initial delays. The example of delays in the first call for proposals 5 "Rehabilitation and modernization of municipal infrastructure - outdoor artificial lighting systems of municipalities" is given, and the NFP explains them with delays in the internal approval process in the Ministry of Energy.

The PO team has considerable experience and is well trained to deal with operational problems, taking into account the "lessons" from the previous programming period, so that some delay is made up. In case of problems (for example when using the ISMM platform) other software operators are consulted, which leads to quickly solving the difficulties. Based on its previous experience, the PO has decided to carry out only ex-post control of the tender documentation, because the beneficiaries themselves take responsibility for participating in the ongoing public procurement procedures. Experience has also been gained from other operational programmes, pointing out that only ex-post control of public procurement is already applied at European level.

1. **Assessment of the effectiveness and efficiency of the programme**

In this section, the implementation of the programme is analysed with a focus on the following key evaluation issues:

* Is the support provided under the programme focused on the most effective and efficient interventions in terms of the goals of the two financial mechanisms, as well as the needs and priorities of Bulgaria in the programming period?
* To what extent have the results, indicators and objectives been achieved or expected to be achieved within the programme? Is there a risk of not achieving the pre-set results and planned values of the indicators and what factors (internal or external to the programmes) cause this risk?
* Are the necessary resources (financial, in terms of time, administrative capacity, procedures, etc.) available to ensure the effective and efficient achievement of the set results, indicators and goals?
* Has the programme operator identified a risk of delay in the implementation of interdependent measures and interventions and how is this risk addressed?

Due to the delay in the implementation of the projects and measures under the programme, no real assessments of the effectiveness and efficiency of the programme and the implemented projects can be made. In terms of effectiveness, the analysis is focused primarily on assessing the measurability, feasibility, and probability of achieving the objectives and expected results of the programme, as well as the risks of not achieving them. In terms of efficiency, an assessment was made of the adequacy of the total amount of financial assistance provided under the EEA FM, the way of using the financial resources, proposals for relocation of funds were studied.

***3.1 Evaluation of effectiveness***

**The PO is of the opinion that the interventions under the *Renewable energy, energy efficiency, energy security* Programme are effective and efficient**. There are possibilities to use additional funds under the programme because many of the submitted quality project proposals cannot be financed with the available resources. Great interest is also expected in the forthcoming calls in the field of geothermal energy and energy efficiency of public buildings. The PO emphasizes that strict requirements are set for achieving energy efficiency and high profitability of the projects that will be supported.

The cooperation of the PO with the team of the NFP is good, as they support the thesis that in the conditions of an emergency pandemic situation the efficiency of the small grant schemes under which NGOs organise trainings for citizens for efficient energy behaviour employees in the municipalities on energy efficiency. Talks were held with the DPPs about the planned activities for training in energy efficiency of citizens to be carried out online with a largely internal resource of the PO. Internal trainers will also be involved, thus freeing up financial resources that can be directed to other more effective projects.

**The indicators for evaluation of the progress in the implementation of the programme are evaluated by the PO and DPP as relevant, reliable, and accurate**. The experience from the previous programming period was used in their construction. Currently, no problematic indicators have been identified in the Programme. The only difficulty that has been discussed with FMO already in the programming process is the requirement to achieve a price of 150 euros per tonne of CO2 saved. The PO states that such a price is unrealistic with 100% grant funding. This indicator cannot be achieved, except with secured co-financing, which is available only for 1-2 projects. Attempts by the PO to change this requirement continue, but nevertheless, it is not perceived as a very significant problem for the implementation of the programme.

When evaluating project proposals, objective and strict criteria are used, such as time for the return on the investment, its efficiency and security. The presence of partners from donor countries also has a significant weight in the evaluation of projects. This provides an incentive for municipalities to seek suitable partners from donor countries and to cooperate with them, including achieving the European objectives set out in the agreements with donor countries.

**The PO is confident that the objectives of the programme will be met**. The expected results will have a positive impact on municipalities and businesses, and through them on end users. The guarantees for success are the created good and competent teams, as well as the reduced administrative burden for the beneficiaries at each stage of the implementation.

***3.2 Evaluation of the financial resources and efficiency of the programme***

The funds under the Programme are EUR 32,941,176, of which EUR 28,000,000 is a grant and EUR 4,941,176 is national co-financing. The funds received under the programme during the interim evaluation period amount to EUR 1,045,000. However, the amount of the costs incurred is only EUR 38,691. **The available financial resources under the EEA FM and the NFM are generally assessed as sufficient to achieve the objectives and priorities of the programme, a view, which is shared by the PO and the DPPs**. For activities related to the efficient use of hydropower and geothermal energy (heating/cooling) in buildings and industry, financial support is also assessed as sufficient. Much more resources can be spent on energy efficiency in buildings, street lighting and industry. Saving energy, reducing carbon emissions and reducing the energy costs of municipalities, households and industry ensures the effectiveness of the measures implemented in this area.

In terms of the amount of funding, a comparison can be made with the previous programming period, when it was two and a half times smaller. Obviously, energy is perceived as a priority by donor countries, but the PO still points out that funding is not enough in terms of achieving pan-European goals. The work on the long-term strategy for residential and non-residential buildings, which is set until 2030, is currently being completed, even with a horizon of 2050, which envisages that 60% of residential buildings will be renovated with at least 60% reduction of their energy consumption; in monetary terms it amounts approximately to one billion euros. The amount available under the programme - just over 30m euros - is not enough to achieve such a goal. Among the goals of the Programme is to demonstrate the positive effect of the implemented projects to achieve specific goals, so that they can become examples of models that could be replicated.

A procedure has been launched to redirect funds from small grant schemes to finance additional 3-4 projects for rehabilitation and modernization of street lighting. Relocation of funds is envisaged under all three small grant schemes to the street lighting procedure, where very good project proposals have been received, and the difference in the quality of the ranked and reserve projects is very small.

***3.3 Risks for the implementation of the programme***

**In the Strategic Report for the period August 1, 2019 – July 31, 2020, the NFP identifies several risks for the implementation of the programme:**

* Delays in the implementation of the programme as a result of insufficient managerial, administrative, and expert capacity within the PO, incl. congestion as a result of a large number of calls for proposals and a large number of potential candidates. The NFP communicates regularly with the PO on the status of current and planned calls for proposals, provides advice and information on good practices. A detailed plan is expected for the forthcoming calls which will include responsible experts, fixed deadlines and monthly reporting.
* Problems with ensuring compliance with state aid rules, which can create serious difficulties for some programme components. The NFP recommends the PO to consult the Ministry of Finance on critical programme components related to state aid.
* Delays in project procurement procedures. Strict timely planning of public procurement is recommended, as the NFP will require up-to-date information on procurement schedules and will promote the use of best practices for documentation used on already conducted and verified procurement.
* General delay in the implementation of the programmes (especially those that include a larger number of calls) in case of possible government changes. The NFP plans to organize meetings at the highest possible level with the management of the PO in order to provide up-to-date information on Bulgaria's obligations regarding the programme objectives, the time schedule and the continuity of the implemented projects and activities.

**4. Bilateral cooperation**

It was found that in the implementation of the first call for project proposals "Rehabilitation and modernization of municipal infrastructure – systems for outdoor lighting of municipalities", many project promoters are partnering with Norwegian counterparts, but the results of this cooperation have yet to be expected. Webinars are currently being held on specific topics related to the implementation of the programme. A similar webinar was conducted in June 2020 on the topic of energy efficiency of public buildings. Partners also benefit from synergies in the implementation of projects, and when possible, are invited to participate and are engaged in the implementation of other programmes.

The cooperation with the DPPs is very good, and the cooperation with the Norwegian partner under the programme is especially active. A very useful visit to Norway was made during the planning of the programme. At the beginning of the programming period, in May 2019, an opening conference and a matchmaking event were held, which were attended by many potential partners from Norway and Iceland. Due to the pandemic situation in 2020 a number of scheduled events and visits have been cancelled, and instead online meetings have been organized. Good informal communication with the partners has been established, a constructive exchange of good practices is taking place.

According to the partners from the donor countries under the Renewable Energy, Energy Efficiency, Energy Security Programme, the cooperation with the PO and the NFP is very good. Constructive meetings are also held within the Cooperation Committee.

## 3.3 Analysis and evaluation of the implementation of the *Environmental Protection and Climate Change* Programme

The analysis and evaluation of the implementation of the *Environmental protection and climate change* Programme is in line with the general objective to carry out a mid-term evaluation of the implementation of the programmes financed under the EEA FM and NFM 2014-2021. The specific objectives of the evaluation of the programme are:

* To assess the progress in the implementation of the programme based on an analysis and evaluation of its objectives, results and products that are expected to be realized from the implementation of the funded interventions / projects.
* To assess the appropriateness, effectiveness, and efficiency of the implementation of the programme, taking into account its specific target groups and specific objectives.
* To assess the achieved results of the interventions under the programme, as well as the probability of achieving or the risk of not achieving the planned results under the individual programmes.
* Assess identified problems and good practices (strengths and weaknesses) from the implementation of the programme, as well as formulate recommendations aimed at overcoming the identified problems that may serve in the process of making informed management decisions.

The evaluation is based on the progress in the implementation of the programme for the period from the signing of the Programme Agreement between the NFP and the EEA FM Office until June 30, 2020, assessing the possibility of achieving of the set goals and results within the deadline for implementation of the projects - April 30, 2024.

**1. Objectives, design, and coordination of the programme**

This section analyses the *Environmental protection and climate change* Programme in relation to the following key evaluation criteria:

* To what extent are the priorities, the selected interventions, and the applied approach (eligible activities, costs, beneficiaries, etc.) appropriate and correspond to the needs, problems and limitations of the target groups of the programme?
* To what extent do the programme interventions complement the support provided under other programmes and financial instruments (in particular ESIF funding and other EU-funded programmes)?
* What are the links and synergies between the programme and the measures implemented under other programmes in order to achieve the national and pan-European goals for economic development and social cohesion?

***1.1 Objectives of the programme and compliance with the needs of the target groups***

The main goal of the *Environmental protection and climate change* Programme is to improve the status of the environment and reduce the adverse effects of pollution and other human activities.

In connection with the evaluation of the goals and priorities of the programme, information was collected on several main topics:

* Correspondence of the goals and priorities of the programme with the problems and needs of the target groups;
* Adequacy and feasibility of the objectives, approach and activities of the programme;
* Proposals to change/supplement the goals and activities of the programme.

**On the whole, the objectives of the programme can be assessed as adequate to the needs and problems of its target groups and relevant to the current needs of the country.**

The *Environmental protection and climate change* Programme aims to improve the state of the environment and reduce the effects of pollution by contributing to the general objectives of the EEA FM. The programme is implemented in two priority areas - environment and ecosystems, and climate change mitigation and adaptation.

The implementation of the programme will contribute to: creation of a system for valuation of the services provided by all ecosystems in Bulgaria; development of a system for assessment, monitoring and management of sea waters; to improve the management of resources at the municipal level (circular economy); to increase the capacity of local authorities to reduce emissions and to adapt to climate change, as well as to improve the interaction between organisations from the beneficiary country and from the donor countries.

The expected results are related to ensuring sustainability in the implementation of the projects, development of favourable cooperation with partners from the donor countries and long-term future benefits for the environment. The programme is aimed at municipalities, educational and scientific organizations, the private and non-governmental sector, and the general public.

The goals and priorities of the programme are formulated through a process of intensive consultations with national and international governmental and non-governmental organizations as stakeholders.

After the start of the programme (May 8-9, 2019), an introductory event was held, directly related to the identification of partners. More than 80 participants took part in the event; 10 were representatives of the donor countries. The result of this event is positive, as the partnerships established within its framework had an impact not only on the pre-defined projects, but also on several bilateral meetings for the preparation of project proposals for open calls.

***1.2 Projects and expected results***

The goal of *Environmental protection and climate change* Programme will be achieved by achieving four outcomes:

**Outcome 1: "Developed system for valuation of ecosystem services",** which includes the implementation of a predefined project "Assessment and implementation of ecosystem services (VAIES)" (PDP 1).

**Outcome 2: "System for assessment, monitoring and management of sea waters"**. According to the programme documents, it will be achieved through:

First, a **pre-defined project "Knowledge and information on regional activities for the protection of the Black Sea environment (SCIRENA-Black Sea)**" (PDP 2).

Second, an **open call "Diffuse marine pollution"** to submit proposals for projects to develop a methodology for assessing marine pollution in the Bulgarian area of the Black Sea. The aim is to develop a methodology for assessing the pressure and impact of diffuse sources of pollution (including atmospheric deposits) on the marine environment and to develop measures to reduce pollution from terrestrial sources on the marine environment.

Third, **two small grant schemes (SGS**). The first is the "Pilot models for seawater treatment" (SGS 1), which targets projects that apply innovative methods and technologies for seawater treatment, followed by educational and information campaigns to demonstrate the effectiveness and benefits of their implementation. The second is for "Marine waste reduction measures" (SGS 2), aimed at projects developing and implementing initiatives to reduce the amount of waste in the marine environment from land-based sources, including training and awareness-raising on marine pollution.

**Outcome 3: "Improved use of resources at the municipal level (circular economy)"**, which will be supported by calls for project proposals under: Open Call № 2 "Circular Economy and Resource Efficiency" and a small grant scheme "Circular Economy" (SGS 3).

**Open Call № 2** is aimed at financing projects of municipalities that will contribute to increasing the share of recycled waste in the total share of generated waste. This will increase the resource efficiency and competitiveness of Bulgarian businesses.

**SGS № 3** is aimed at awareness raising projects in terms of resource management, the circular economy and recycling. Actions and measures will ensure the reduction and prevention of adverse effects on human health and the environment through awareness and prevention.

**Outcome 4: "Increasing the capacity of local municipalities to reduce emissions and adapt to climate change."** It includes the implementation of:

**PDP 3 "Implementation of innovative measures for mitigation and adaptation to climate change in the municipalities in Bulgaria"**;

**Open Call 3 "Climate"**, aimed at increasing the capacity of municipalities to assess their strategic plans and programmes in terms of planned and implemented actions, resulting in reduction of greenhouse gas emissions and adaptation to the expected adverse effects of climate change and

**SGS 4**, which focuses on projects for education and awareness-raising campaigns on climate change. The call aims to contribute to increasing the number of people trained on climate change and the number of schools/kindergartens carrying out awareness-raising/education activities on climate change.

Significant financial resources from the programme are directed to local authorities given the need for significant investments for the implementation of projects with a focus on adaptation to and mitigation of climate change and the circular economy. Municipalities accept and recognize the goals and interventions of the programme as adequate and. The PO acknowledges some difficulties for beneficiaries in finding suitable partners, but at the same time the PO acknowledges the role of the Norwegian Environment Agency, which actively assists and supports applicants in finding partner organizations from donor countries.

Other activities of the programme with a focus on awareness and education for adaptation to and mitigation of climate change and the circular economy are focused on schools (public, municipal, private), which may have as partners non-governmental organizations (NGOs). The aim is to influence both students and teachers. NGOs are a valuable partner in the implementation of projects under the programme given their experience in implementing projects in the areas of environment and education and their good interaction with educational institutions. PO has also noted some challenges regarding the schools, as their representatives have raised a number of issues about the implementation of educational campaigns and the possibility of involving the teaching staff in the implementation of projects.

**In general, the programme can be assessed as appropriate, adequate to the needs of the target groups, realistic and feasible. There is a great interest on the behalf of the beneficiaries in the open procedures for collecting project proposals**. In the case of grant schemes aimed at schools, projects were also submitted by schools from small settlements. The design of the programme allows achieving sustainability of projects with elements of flexibility and the ability to adapt and update. The indicators in the programme agreement have been transferred at the level of procedures, respectively at the project level. They are appropriate, clear, measurable and allow for monitoring the implementation of the objectives of the programme.

***1.3 Coordination/synergy of the programme***

An important aspect of the evaluation is the complementarity between the evaluated programme and the measures implemented under other programmes in order to achieve the national and pan-European goals for economic development and social cohesion. The programme corresponds and is developed in accordance with the main national and European strategic documents and current legal framework:

**National framework legislation in the field of the environment**

The framework law in the field of environmental protection is the Environmental Protection Act. The law regulates:

* protecting the environment for present and future generations and protecting human health;
* the conservation of biological diversity in accordance with the natural biogeographical characteristics of the country;
* protection and use of the components of the environment;
* control and management of factors that harm the environment;
* control over the state of the environment and sources of pollution;
* prevention and reduction of pollution;
* the establishment and functioning of the National Environmental Monitoring System;
* strategies, programmes and plans for environmental protection;
* collection and access to environmental information;
* the economic organization of the environmental protection activities;
* the rights and obligations of the state, municipalities, legal entities and individuals regarding environmental protection.

**Sectoral strategic documents and regulations**

***Water***

The national legislation in the field of water management covers the following acts: Law on Environmental Protection and Law on Waters. The national strategic and planning documents in this area include the National Strategy for Management and Development of the Water Sector, River Basin Management Plans, Flood Risk Management Plans, Maritime Strategy of the Republic of Bulgaria, national programmes in the field of water protection and sustainable development.

Coordination with the following documents is important for the Environmental Protection and Climate Change Programme in this area:

**Maritime Strategy of the Republic of Bulgaria and programme of measures**

The document was adopted by Decision № 1111 of the Council of Ministers of 29.12.2016 and is valid until the end of 2021. The preparation and implementation of the Marine Strategy is in connection with the transposition of the requirements of the Maritime Strategy Framework Directive (MTFD) 2008/56 / EU in Bulgarian legislation and the implementation of Bulgaria's commitments under Art. 1, items 1 and 2 of the MTFD. The initial assessment of the state of the marine environment (according to Art. 8 of the MTFD), the definitions of good status of the marine environment (according to Art. 9 MTFD) and the identification of environmental objectives and related indicators (according to Art. 10 RDMS) represent the first part of the Marine Strategy. They were developed in 2012. The monitoring programme (according to Article 11 of the MTFD) is the second part of the maritime strategy and was developed in 2014. The programme of measures has a period of action 2016 - 2021.

River Basin Management Plans 2016 - 2021 (RBMP). RBMPs refer to the following regions: Danube region, Black Sea region, East Aegean region, West Aegean region. The national supporting documents are Groundwater, Surface Water, Economic aspects, National Catalogue of Measures.

***Air***

The state policy for protection of the purity of the atmospheric air is aimed at achieving and maintaining the air quality in accordance with the requirements determined by the international and domestic legislation. The assessment of the air quality on the territory of the country is carried out through the National Control System, through which the concentrations along the main indicators are controlled daily. Through the changes in recent years in the Clean Air Act (Promulgated SG No. 45 of May 28, 1996, last amended and supplemented SG No. 81 of October 15, 2019), the Bulgarian legislation has been harmonized with the European legislation.

***Nature***

International and national legislation covers the following acts and documents: Law on Environmental Protection, Law on Biological Diversity, Law on Protected Areas, Law on Medicinal Plants. The strategic documents in this area are the National Priority Framework for Action for Natura 2000 for the period 2014-2020, the Strategic Plan for Biological Diversity 2011-2020, the EU Strategy for Biological Diversity, the National Plan for Conservation of the Most Important wetlands 2013 – 2022.

***Climate***

The Law on Climate Change Reduction was adopted in 2014, and the latest amendments are from March 2020. The Republic of Bulgaria is implementing the third National Action Plan on Climate Change, the preparation of a National Adaptation Strategy is underway. Bulgaria successfully participates in the European scheme for greenhouse gas emissions trading with 127 installations on the territory of the country. Together with the other Member States of the European Union, Bulgaria will meet a common goal of reducing greenhouse gas emissions by at least 40% by 2030 with the adoption of the Framework for Climate and Energy Policies by 2030.

***Waste***

Legislation in the field of waste management includes the Law on Environmental Protection and the Law on Waste Management. The national strategic and planning documents include the National Waste Management Plan 2014-2020, the National Strategic Plan for Sludge Management from Urban Wastewater Treatment Plants 2014-2020, the National Strategic Plan for Construction and Demolition Waste Management 2011- 2020 and a National Strategic Plan for the gradual reduction of the quantities of biodegradable waste destined for landfill.

**The *Environmental protection and climate change* Programme** **is implemented in accordance with the listed strategic and regulatory acts and documents related to the eligible for financing and implementation activities (interventions).**

Based on the assessment of the objectives, design, and coordination of the *Environmental protection and climate change* Programme the following findings can be outlined:

First, **no inappropriate activities (interventions) have been identified in the programme**. A good example is the SGS “Marine waste reduction measures". Municipalities are showing strong interest in the SGS. Quality project proposals have been received under the call, and there are six approved innovative projects with a significant and measurable result. It should be borne in mind that marine waste is not regulated under Bulgarian law and municipalities do not have obligations delegated by the state in this area. This means that they are aware of the importance of the problem and seek effective solutions with the support of the programme.

Second, there is a **high activity of municipalities in preparing projects under the programme, which exceeds initial expectations**. A positive impact on the awareness and activity of municipalities for the development of project proposals is also observed as a result of the more active information policy of the Ministry of Environment and Waters as a key for the implementation of climate policies. The importance of topics related to climate, the circular economy, and the protection of the marine environment from pollution, incl. environmental education is reported in particular under SGS 2, SGS 3 and SGS 4.

Third, the beneficiaries are **very ambitious in terms of the quality of project proposals**. Most of them have developed and submitted large-scale projects aimed at maximum funding, which is a serious challenge for PO, as financial resources are limited, and the interest is very high. A detailed evaluation of project proposals is also needed to select the best projects, which sometimes leads to delays in evaluation procedures. The PO notes that if more resources are available, it would be possible to provide support for more quality projects.

Fourth, **grant schemes targeting schools and kindergartens can be evaluated as a sustainable investment in environmental education**. Schools and kindergartens are organizations sustainable in time and create traditions in education. An important aspect when targeting this group of eligible candidates under the programme is that teachers change their jobs less often than other professionals. This defines the significance of their training with the implementation of projects under SGS 3 and SGS 4. As a result, teachers will be able to provide education in the field of environmental issues for a long time in the future. It should be borne in mind that schools have delegated budgets and cannot afford to finance activities in the field of environmental education. Funds are prioritized for non-governmental organizations, which, however, also receive support from the EEA FM. An example in this respect is the Active Citizens Fund, which is aimed entirely at NGOs. Under the programme, eligible partners for project implementation (SGS3 and SGS4) are NGOs, as applicants report their experience in implementing projects in the field of environmental education. Other partners in the programme are private organizations, and most of the submitted projects have partners from donor countries. A total of 75 project proposals have been submitted so far under all procedures, involving 55 organizations from donor countries as the main partners of the applicants.

Fifth, **the synergy with other financial instruments and their results is sought at the level of programming with OP Environment, the Rural Development programme 2014 - 2020, as well as with the *Renewable Energy, Energy Efficiency, Energy Security* Programme** **under the EEA FM 2014 – 2021**. There is a productive cooperation with the experts from the *Renewable Energy, Energy Efficiency, Energy Security* Programme, which is reflected in the achieved demarcation, as well as reciprocal participation of experts from both programmes in the evaluation process of the respective partner programme. Methodologies for evaluation of project proposals developed in cooperation are used, there is complementarity and synergy of the implemented activities without duplicate funding. The results from the previous programming period (2009 - 2014) are upgraded in the current one. A new element in the current programme is the focus on climate, which in the next programming period should be continued and upgraded, taking into account the Green Deal priorities of the EU and the commitment to carbon neutrality by 2050.

1. **Assessment of progress, delays, and problems in the implementation of the programme**

In this section, the analysis focuses on the following key evaluation issues:

* What is the progress made (by June 30, 2020) under the programme in terms of negotiation and implementation of measures, incl. in terms of results achieved?
* Are there any deviations / delays from the initial programme implementation schedule? What is the reason for this and what is the potential impact of these delays on the successful implementation / finalization of the interventions and the achievement of the set results?
* Is there a realistic up-to-date plan for the implementation of the measures under the programme?
* Has the programme operator identified risks of delays in the implementation of time-dependent measures and interventions and how is this risk addressed?
* What problems have been identified in terms of: the design / programming of interventions, the selection of project proposals, contracting, monitoring and reporting, financial control and payments, prevention systems, risk management systems, registration and reporting of irregularities, the procedures for monitoring, evaluating and reporting on the implementation of the programme, information and communication measures, etc.?

***2.1 Programme implementation status***

By the end of the evaluation period (June 30, 2020), the PO announced calls for project proposals for two open calls (1 and 2), three small grant schemes (SGS 1, SGS 2 and SGS 3) and two pre-defined projects (PDPD 2 and PDP 3). By the end of 2020, call 3 and SGS 4 have been announced.

**Outcome 1: Developed system for assessment of the economic value of all ecosystems in Bulgaria**

The outcome is expected to be realized through a pre-defined project "Economic value assessment and integration of ecosystem services (VAIES)". In 2019, in the during the stage of the project preparation, demarcation activities were carried out in relation to the Operational Programme Environment, funded by the ESIF. Within the framework of this outcome, the following activities were implemented: regular contact with the partner from the donor country (Norwegian Environment Agency NINA), related to the harmonization of policies between the two countries; preparation of the project concept, which is crucial for the further implementation of the activities in order to achieve the desired results; meetings with experts on the implementation of policies for valuing of the services provided by ecosystems, leading to the successful adoption and implementation of these policies.

Ecosystem services are assessed as very important and are incorporated in the policy of the EU, incl. the taxonomy policy. In the previous programming period, the valuation of ecosystems and their services was started but has not included the Natura 2000 network. In the present project a methodology for assessing the economic value of ecosystem services, including Natura 2000, will be developed. The project ”Valuation of the economic value and integration of ecosystem services (VAIES)” has already been developed but has not been launched. According to the PO it is not a matter of delay, but of strategic planning. A key issue for the PO is to ensure continuity and upgrade the expected results of the project, and to ensure synergy and demarcation with related programmes and projects launched after the approval of the programme. The project is expected to start in mid-2021.

**Outcome 2: Developed system for assessment, monitoring and management of sea waters.**

Within this outcome, activities have been undertaken for the preparation of a description and Guidelines for applying for the pre-defined project, preparation and announcement of the open call for project proposals (call 1) and the two small grant schemes (SGS 1 and SGS 2):

**PDP 2 "Knowledge and information regarding regional activities for environmental protection of the Black Sea" (SCIRENA-Black Sea)".** Initially, no project partner was identified from the donor countries. Subsequently (by amending the Programme Agreement, Annex II) the Norwegian Institute for Marine Research was formally involved as a partner. The Institute of Oceanology of the Bulgarian Academy of Sciences withdrew as a partner. The project is extremely important, as a penal procedure is underway by the European Commission against Bulgaria on issues that fall within its scope. The new partners who can take over the implementation of the planned activities are Nikola Vaptsarov Higher Naval School, Varna (NVHNS) and the Institute of Fishery Resources-Varna (IFR). The NFP and the FMO have approved the proposed replacement of project partners, which is formalized through Amendment of Annex II to the Programme Agreement. Several meetings and cooperation activities related to the preparation of detailed and budget of the project have been conducted and sent to FMO for approval on December 4, 2019. The application guidelines were published on 12 March 2020. The project proposal is in the process of evaluation. In the course of the evaluation, several additional actions/revisions were requested by the applicant to meet the criteria for compliance and admissibility. PO plans to launch the project in the second half of 2021.

**Open Call 1: "Diffuse marine pollution".** The application guidelines have been prepared by the PO and approved by the NFP, and all comments and suggestions from the NFP, the DPP and the FMO have been taken into account and reflected in the final text of the application guidelines. PO announced the call on November 1, 2019 with a deadline for submission of project proposals by January 16, 2020. Only one project proposal was submitted, which was rejected by the PO on the grounds of non-compliance with the criteria for administrative compliance and eligibility. The PO has analysed the reasons for this result, and after the completion of the evaluation procedures for the other announced calls, it plans to announce the call again in the first half of 2021.

**Small grant scheme "Pilot models for seawater treatment"** (SGS 1). The application guidelines were prepared by the PO and approved by the NFP after coordination with the DPP and FMO, whose comments and suggestions are reflected. The call was opened on December 20, 2019, with a deadline for submission of project proposals February 28, 2020. The evaluation procedure started on March 20, 2020. One project proposal was submitted, rejected by the PO due to non-compliance with the criteria for administrative compliance and eligibility. The PO has agreed with FMO that the budget is allocated to SGS 1, due to the great interest in SGS 2 and given the fact that non-processing of SGS 1 will not lead to non-implementation of Outcome 2, will be relocated to the general budget of SGS 2.

**Small Grant Scheme "Marine waste reduction measures" (SGS 2).** The call for applications under this scheme is aimed at projects developing and implementing initiatives to reduce the amount of waste in the marine environment from land-based sources, including training and awareness-raising on marine pollution. SGS 2 was launched on 28 January 2020 with an extended deadline for submission of proposals until 29 May 2020, due to the COVID-19 situation. The submitted project proposals were evaluated, and 6 of them were proposed for funding by the PO. Decisions of the PO for financing have been issued and a negotiation process is underway.

In addition, an online event was held on 31 October 2020 on the occasion of the International Black Sea Day, during which a short presentation of the programme Environmental Protection and Climate Change and the results of the evaluation of project proposals under the SGS 2 were made. The event was attended by representatives of the Permanent Secretariat of the Commission for the Protection of the Black Sea against Pollution, the World Bank, academia, and the Donor Programme Partner - the Norwegian Environment Agency.

**Outcome 3: "Improved resource management at the municipal level (circular economy)".**

Within this outcome, activities were carried out for preparation of the application guidelines for an open call for project proposals and a small grant scheme:

**Open Call 2: "Circular Economy and Resource Efficiency"**, which has started on 8 May 2020 with a deadline for applications by 31 August 2020.

**Small grant scheme "Circular Economy" (SGS 3)**, which has started on April 6, 2020 with a deadline for submission of project proposals by July 31, 2020. The submitted project proposals for both calls are in the process of evaluation by the PO.

**Outcome 4: Increase the capacity of local municipalities to reduce emissions and adapt to climate change.**

Within this result the following activities have been implemented:

**PDP 3: "Implementation of innovative measures for climate change mitigation and adaptation in municipalities in Bulgaria".** In order to better cooperate with the DPP ("Norwegian Association of Local and Regional Authorities"), the beneficiary of the project visited the DCP in the period of 20-22.08.2019. As a result of the meeting, the partners prepared a time schedule for the implementation of the project activities in order to ensure maximum efficiency and achieve the set results. The National Trust Ecofund (NTEF) is preparing a concept and budget for the project and they have been sent to the FMO for approval on November 29, 2019. The Guidelines for applicants were published on April 2, 2020, and the project proposal was published June 30, 2020.

The project is important with respect to the European Green Deal. The measures are expected to target municipalities in an innovative way (for example, building rainwater collection and irrigation systems). It also relies on the expertise of the DPP. The project will be implemented on the territory of 8 municipalities, and includes measures of the National Adaptation Plan, adopted in September 2019. In the end of 2020, the PO has approved the project, but the partnership agreement between the beneficiary, the municipalities and DPP has not been signed yet. According to the PO, all activities can be started, and NTEF is already actually implementing some of them. The reason for the delay is related mainly to the COVID-19 pandemic.

After June 30, Guidelines for applicants for two calls for project proposals have been published:

**Open call "Climate",** which was announced on July 21, 2020 with a deadline for submission of project proposals October 7, 2020. It finances projects of municipalities for the implementation of activities under their strategic plans. Activities will focus on reducing or limiting greenhouse gas emissions and strengthening the resilience of local communities to climate change and will contribute to the implementation of the National Strategy for Adaptation to Climate Change. Projects for the implementation of innovative measures, technologies to support climate change mitigation and adaptation in the transport, waste, construction, energy and water sectors are expected.

**Small grant scheme "Climate" (SGS 4**), which started on July 15, 2020 with a deadline for submission of project proposals by September 30, 2020. It focuses on educational and awareness-raising projects; increasing the number of people trained on climate change (children and teachers); increasing the number of schools or kindergartens carrying out climate change awareness/education activities.

**Bilateral result: Enhanced cooperation between beneficiaries and DPPs participating in the programme**

An introductory event (matchmaking event) was conducted in the period 8-9 May 2019 with over 80 participants, 10 of whom were DPPs. The event was a success, enough time was spent to establish contacts between the participants and share experiences; and some contacts have been followed up by additional meetings supported by the travel support scheme.

On March 13, 2019 PO has announced a Call for a travel support scheme, under which in 2019, applications for support of four organizations have been approved. Three of the supported organizations have partners from Norway. A visit to Iceland was also made. As a result of the meetings and discussions under this scheme, the project schedules have been updated, changes have been made in the deadline for the implementation of the planned project activities in order to ensure maximum efficiency. The travel support scheme reduces the time needed to reach a consensus on letters of intent, to preparation of activities and project budgets.

On the whole, information on the progress made under the programme shows that, **in terms of the measures launched, it is at an advanced stage of implementation**, given that, together with the *Renewable Energy, Energy Efficiency, Energy Security* Programme, the programme covers the largest number of open calls and small grant schemes. The PO organizes information days for each call invitation launched - three of them are organized through personal attendance, and the rest have been conducted online, which has allowed for the attendance of a significant number of participants (over 1000).

***2.2 Delays and problems in the implementation of the programme***

**Initial schedules for announcing open calls, small grant schemes and pre-defined projects have been delayed by about a year**. The first two open invitations were planned to for the second half of 2018, and both were announced in June 2019. The third open call was scheduled for the first half of 2019 and will be started in July 2020. All four small grant schemes were originally scheduled for the first half of 2019. SGS 1 and SGS 2 were announced in the end of 2019, SGS 3 - in the spring of 2020, and SGS 4 was published on March 25, 2020.

Initiatives related to the circular economy, climate challenges and sea waters are assessed as progressing successfully, albeit with delays. The DPP doubts that the high ambitions related to sea water management and marine waste reduction under the pre-defined project "Knowledge and information on regional environmental activities in the Black Sea" (SCIRENA-Black Sea) will not be able to achieve the initially set objectives and outcomes. The recommendation of the DPP is the timetable for the implementation of the programme to be kept up to date with the current situation, as the achievement of its objectives is becoming increasingly sensitive to possible future delays. These could be related to pandemic measures which impact travel, organizing meetings with potential partners, discussing the content of project proposals, difficulties in obtaining relevant licenses, agreements, and signatures, etc.

**As of June 30, 2020, no circumstances have been identified that pose a serious risk to the implementation of the programme**. The first anti-epidemic measures in early 2020 did not have a significant impact on the implementation of the project. The PO estimates that the accumulated delays can be compensated within the deadline for completion of projects in April 2024 and that no changes will be required.

The pandemic makes travel and bilateral relations more difficult, and remote communication does not allow for a full exchange of experience with partner organizations. This requires more flexibility and adaptability. There are also difficulties in conducting on-site inspections in the context of strict anti-epidemic measures - according to the PO, it is possible to use drones for the inspections.

**The PO identifies a possible risk related to the delay in the case of appeals related to the public procurement procedures under the Public Procurement Act of the Council of Ministers No. 118 / 20.05.2014**. In the previous period, due to appeals against procedures for selection of an external contractors, it was necessary to extend the deadlines for finalization of projects. However, in the current programming period, the projects are of a smaller scale and the risks are minimal. Plans for project implementation have been prepared, algorithms for early information and warning of beneficiaries about possible risks have been developed. A separate section on risks is included in the project implementation contracts. They carry out risk assessments in advance, there are plans to respond to problems of various kinds, including specific response measures.

**No significant problems related to the management of the programme were identified**. The team of PO has significant experience and is well trained to deal with operational problems, taking into account the lessons learned from the previous programming period. Some staff turnover of the PO has been registered, but the administrative capacity has been maintained through immediate measures to hire new experts.

Continuing training is also provided, which is oriented towards ongoing changes in the socio-economic context, in the legal framework and the institutional framework, in the management and control procedures. The programme operator envisages conducting trainings for all beneficiaries, which will be aimed at the legal aspects of public procurement, the specific features of project implementation, financial aspects of project management, communication and information activities of the beneficiaries, as well as irregularities and ways to prevent them.

In the opinion of the DPP, the **procedures for submitting project proposals are too cumbersome and bureaucratic**. This creates difficulties to comply with all formalities for applicants with small experience. The workload associated with fulfilling all formal obligations might discourage some applicants to submit project proposals. It is recommended that this issue be addressed in the negotiations for the fourth programming period of the EEA FM and the NFM.

The work and cooperation with foreign and national partners of the programme is assessed as very good. Several official workshops are conducted annually, and over time, informal communication develops. Communication with the donor partner, the Norwegian Environment Agency, is also good. The DPP also assesses its interaction with the PO and the NFP as fruitful and constructive but there are concerns that the meetings of the Cooperation Committee, which are generally scheduled to take place twice a year, have not been organized since 15 April 2020. The DPP also expects to be better informed about the progress of the three pre-defined projects, about the changes in the plans for holding physical meetings and their replacement with virtual ones, about the need to modify the initially set goals and indicators under these three PDPs.

1. **Evaluation of the effectiveness and efficiency of the programme**

In this section, the implementation of the programme is analysed with respect to the following key evaluation issues:

* Is the support provided under the programme focused on the most effective and efficient interventions in terms of the objectives of the two financial mechanisms, as well as the needs and priorities of Bulgaria in the programming period?
* To what extent have the results, indicators and objectives at the programme level been achieved or expected to be achieved? Is there a risk of not achieving the set results and planned values of the indicators and what factors (internal or external to the programme) contribute to this risk?
* Are the necessary resources (financial, time, administrative capacity, procedures, etc.) available to ensure the effective and efficient achievement of the set results, indicators and goals?

***3.1 Evaluation of effectiveness***

Contracts for the submitted projects are yet to be signed and the results of their implementation can be evaluated in about two years. **There are no serious risks to achieving the objectives of the programme at this stage.**

The indicators for evaluation of the results are quantitatively measurable and are set at the programming stage. Their construction, as well as their baseline and target values, have been set in accordance with the regulations of the EEA FM and the NFM. The indicators are adequate and there are no proposals for their change. According to the PO, there are expectations for over-fulfilment of the set values of some of the indicators even at this early stage of implementation. Mechanisms for control at the national level have been developed, monitoring the degree of achievement of the objectives.

**The planned interventions at this stage can be assessed as appropriate, effective, realistic, and traceable. They are adequate to the needs and priorities of Bulgaria in the programming period and largely correspond to the problems and needs of the target groups of the programme.**

***3.2 Evaluation of the financial resources and efficiency of the programme***

**From the point of view of the planned activities and achievement of the expected results under the programme, the financial resources are assessed as sufficient**. In the period from the signing of the Programme Agreement for financing the programme till June 30, 2020, the total amount of the transfers made to the Programme Operator amounts to EUR 3,749,180. The costs incurred amount to EUR 300,000, which is a relatively small share of the transferred funds. This can also be interpreted as a certain delay in the use of the financial assistance under the EEA FM and the NFM.

A reallocation of funds provided for a small grant scheme for pilot models for seawater treatment has been made (SGS 1). In the first call under SGS 1, only one project proposal was received, which was rejected by the PO due to non-compliance with the evaluation criteria. Subsequently, after consultation with the NFP and the DPP, the PO agreed with the FMO to redirect the budget of SGS 1 to finance projects submitted under the same result under the small grant scheme "Marine Waste Reduction Measures" (SGS 2), which has attracted great interest on behalf of the municipalities. Funds amounting to EUR 350,000 have been redirected to SGS 2. In case there are savings, some of the funds can also be relocated, but the PO considers this scenario unlikely.

***3.3 Risks for the implementation of the programme***

In the Strategic Report for the period 01.08.2019 - 31.07.2020, the NFP identifies two risks related to the management of the programme:

**Delays in fulfilling the condition set in the Programme Agreement for performing external verification and verification**, which might delay the payment of PDP funds. Careful monitoring and regular communication with the PO is envisaged to ensure that all conditions are met before the planned start of the application procedures. The NFP advised the PO to ensure the timely selection of an external verifier in order to avoid liquidity problems for project organizers. The PO plans to select a contractor (by the first quarter of 2021 at the latest) immediately after signing the grant agreements.

**Delayed evaluation and negotiation process due to the parallel launch of all open procedures and PDPs**. The PO has taken measures to strengthen its administrative capacity by hiring experts and identifying training needs. The recommendation is to monitor the implementation of the updated programme schedule on a monthly basis and to include experts from the PO team in suitable trainings.

## [3.4 Analysis and Evaluation of the Implementation of the *Cultural Entrepreneurship, Heritage and Cooperation* Programme](#_Toc50997792)

The analysis and evaluation of the implementation of the *Cultural Entrepreneurship, Heritage and Cooperation* Programme is consistent with **the overall goal** to conduct an interim evaluation of the implementation of programmes funded by the EEA FM and NFM 2014-2021.

**The specific objectives** of the evaluation of the *Cultural Entrepreneurship, Heritage and Cooperation* Programme are:

* To assess the progress in the implementation of the programme based on the analysis and evaluation of its objectives, results and products that are expected to be realized from the implementation of the funded interventions/projects;
* To assess the appropriateness, effectiveness and efficiency of the implementation of the *Cultural Entrepreneurship, Heritage and Cooperation* Programme, taking into account its specific target groups and specific objectives;
* To evaluate the achieved results of the interventions under the *Cultural Entrepreneurship, Heritage and Cooperation* Programme, as well as the probability of achieving or the risk of not achieving the planned results under the individual Programmes;
* To assess identified problems and good practices (strengths and weaknesses) from the implementation of the *Cultural Entrepreneurship, Heritage and Cooperation* Programme, as well as to formulate suggestions aimed at overcoming the identified problems and to offer recommendations that can serve in the process of making informed management decisions.

The evaluation is based on the progress in the implementation of the *Cultural Entrepreneurship, Heritage and Cooperation* Programme for the period since signing the Programme Agreement between the National Focal Point (NFP) and the EEA FM Office (FMO) until 30 June 2020, the focus of assessment being the possibility of achieving the set goals and results within the deadline for project implementation – 30.04.2024.

1. **Objectives, design and coordination of the programme**

This section addresses the following key issues in the evaluation of the implementation of the *Cultural Entrepreneurship, Heritage and Cooperation* Programme:

* To what extent are the priorities, the selected interventions and the applied approach (eligible activities, costs, beneficiaries, etc.) appropriate and correspond to the needs, problems and limitations of the target groups of the programme?
* To what extent do the programme’s interventions complement the support provided under other programmes and financial instruments (in particular ESIF funding and other EU-funded Programmes)?
* What is the link and synergy between the programme and the measures implemented under other programmes in order to achieve the national and pan-European goals for economic development and social cohesion?
	1. ***Programme goals and objectives and compliance with the needs of the target groups***

The *Cultural Entrepreneurship, Heritage and Cooperation* Programme aims at improving the conditions and quality of presentation of the Bulgarian rich cultural heritage by applying interactive methods and by creating entrepreneurial ideas to promote a wider interest in cultural heritage. The focus of the programme is on promoting the diversity of culture and arts within the European cultural heritage, supporting activities and initiatives to ensure wide public access to cultural content, emphasizing European identity and promoting cultural diversity. The different results of the programme are formed as a unique opportunity for cultural institutes and organizations to achieve a significant change in the way they work, in the way cultural heritage is preserved and managed, and last but not least as a basis for establishing strong entrepreneurial models. During the development of the programme, the experience from the implementation of the programmes and projects supported by the EEA FM and the NFM in the period 2009-2014 was taken into account, and in particular the experience of the PO related to Outcomes 1 and 2 of the previous programming period of the EEA and NFM funding under the BG08 *Cultural Heritage and Contemporary Art* Programme.

In regard to the evaluation of the goals and priorities of the programme, information was collected on several main topics:

1. Correspondence of the goals and priorities of the programme with the problems and needs of the target groups.

2. Adequacy and feasibility of the objectives, approaches and activities of the programme.

3. Proposals for changes of or supplements to the goals and activities of the programme.

**The goals of the programme can be evaluated as adequate to the needs and problems of its target groups.** The main goal of the programme is to strengthen social and economic development through cultural cooperation, cultural entrepreneurship and management of cultural heritage, which are seen as resources for local and regional development. The main challenges identified during the stakeholder consultation on this programme (both at national level and with donor countries) are related to the instrumental value of culture and arts for social and economic development and for capacity developments in these fields through bilateral cooperation.

The programme addresses several key challenges and priority needs of the target groups in the field of cultural entrepreneurship, heritage and cooperation. In the stakeholder consultations, the following **four main areas of the programme** were identified, where projects are funded to achieve the following outcomes:

1. Cultural heritage management conditions enhanced;

2. Access to arts and culture improved;

3. Awareness of arts and culture of ethnic and cultural minorities improved (Roma focus);

4. Enhanced cooperation between donor state and beneficiary state entities.

The programme focuses on the role that culture and cultural heritage play in local and regional development with an emphasis on employment, social inclusion and cultural entrepreneurship through support for projects under Outcome 1 and Outcome 2. Under Outcome 1 the programme supports projects that focus on the documentation of the cultural history of social, ethnic and cultural minorities and groups with a focus on the Roma.

**Outcome 1. Cultural heritage management conditions enhanced.** This outcome is accomplished through two open calls for project proposals:

* 1. Cultural heritage presented in revitalized, restored and renovated spaces;
	2. Cultural heritage objects made accessible / Digital accessibility of cultural heritage.[[7]](#footnote-7)

Outcome 1 in its two sub-areas aims at improving the management of cultural heritage, revitalizing this heritage and increasing its accessibility. Among the main challenges in this area, which were identified during the stakeholder consultations, are sub-optimal conditions for the presentation of cultural heritage collections in cultural institutions, the lack of competence in the field of reuse, promotion and marketing of cultural heritage, and the low available funding for these types of interventions in Bulgaria. In Bulgaria, over 10 million cultural heritage objects are deposited in 200 museums and galleries and 2,800 libraries under conditions that are far from optimal. The lack of funding for culture in Bulgaria became apparent during the previous Programming period of the EEA FM (2009-2014), when altogether 33 projects were funded at a total value of about EUR 15 million, while the number of all project proposals was 370 for over EUR 115 million. Given the outdated state of many museum collections (an issue that also came to the fore during the consultations), this outcome is also aimed at revitalizing the presentation of collections, but also placing objects in context, developing educational activities and information activities to attract more visitors.

Especially with regard to Result 1.2 “Cultural heritage objects made accessible / Digital Accessibility of Cultural Heritage” (where opportunities are directly related to Measure 2 of Programme Area 8 in BG08, financed under the EEA Grant Scheme for the period 2009-2014) in 2019 the PO decided to further specify the activities supported under this outcome. A bilateral stakeholder meeting (*matchmaking event*) under outcome 1.2 was planned to take place. However, it has been postponed due to Covid-19 situation.

At the same time, the DPP notes that some of the indicators set in the programme framework under the outcome 1.2 are not very relevant for achieving the expected results. The indicators “number of cultural heritage value items converted into digital format” and "number of touring cultural exhibitions” are mentioned in particular. According to the DPP, the targeted numbers for these two indicators are not entirely relevant, as it is not the number but the quality that determines whether the implementation of the activities will lead to good results.

**Outcome 2. Access to arts and culture improved** isalso envisaged to be implemented through two calls for project proposals:

2.1. Audience development enhances;

2.2. Cultural entrepreneurship enhanced.

The Programme aims at increasing people's access to and participation in arts and culture through various activities. Art and culture undoubtedly have the potential to contribute to greater social inclusion. One of the main mechanisms for developing this potential is within the frame of outcome 2. The development of the capacity of cultural operators in the field of audience participation and knowledge transfer is attained through cultural cooperation at the international level between cultural operators from Bulgaria and donor countries. Emphasis is placed on access to culture in local and regional areas, for example through public development, cultural entrepreneurship and improved access to culture for ethnic and cultural minorities. This focus was recommended by stakeholders during the April 2017 consultation meeting.

Also, at the bilateral stakeholder meeting, organized jointly with the DPP (The Arts Council – Norway), information was exchanged on the state of the digital sector in both countries. This matchmaking event took place in January 2019 and brought together about 200 cultural organizations and operators from Bulgaria and the donor countries, enabling the PO to further improve the Call for Proposals and the Guidelines under this outcome.

Within this outcome projects are supported that aim at organizing a variety of artistic and creative events, festivals, performances, exhibitions and initiatives that will revitalize the peripheral spaces, breathe new life into smaller towns and villages and last but not least – will attract and engage new audiences.

**Outcome 3. Improved awareness of arts and culture of ethnic and cultural minorities with a specific Roma focus** (Programme Area 7: Roma Inclusion and Empowerment).

This outcome is aimed at stimulating greater social cohesion in Bulgaria by improving the mutual understanding between the cultures of the majority and minorities with a focus on the Roma. Activities in this area are aimed at developing cultural or educational events, exhibitions and documenting cultural history with an emphasis on Roma culture, Roma participation in this culture and improving its accessibility.

Outcome 3 is implemented through a small grant scheme (SGS), in which it was initially planned to have two calls for proposals, and subsequently they were combined into one call (see below 2.1. Status of Programme implementation). The projects supported within this outcome are aimed at the inclusion of the Roma and improving the situation of the Roma population in Bulgaria, using culture and art as a means of developing skills and capacity or as a path to education.

In the preparation of the invitation under Outcome 3, the results of the Round table on Roma integration, organized by the NFP and FMO in December 2019, are taken into account. The event entitled "Measures for Roma integration under the EEA FM and NFM 2014-2021" was attended by over 120 representatives of various organizations and structures working on Roma inclusion. During this round table, the PO made contacts with many representatives of Roma organizations, presented the future call for project proposals under Outcome 3 in detail and received a very positive feedback, as well as a considerable interest in Outcome 3 as a whole. In this sense, for the PO the round table discussions make a valuable contribution to the development of the detailed eligible activities under the call, as well as to the identification of the specific needs, problems and even cultural features of the Roma community.

**Outcome 4. Enhanced cooperation between beneficiary and donor states**

Within this outcome the aim is the implementation of projects so as to ensure enhanced professional cultural cooperation between cultural operators, which will lead to the exchange and transfer of knowledge and good practices between cultural operators from Bulgaria and donor countries and accelerated training of Bulgarian participants. Bilateral cooperation stimulates the exchange of knowledge and develops the ability of cultural operators to work on projects in an international context. The emphasis on bilateral cooperation was set out during stakeholder consultations. Bilateral cooperation is seen as a crucial tool to fill the current gaps in cultural supply. The Arts Council in Norway, which is the donor programme partner, identifies the part for bilateral cooperation in the field of arts and culture (Outcome 4) as relevant to the problems and needs of the target groups.

The results in this area are achieved also through the implementation of bilateral activities under outcomes 1, 2 and 3. The activities related to outcome 1 include knowledge transfer in cultural heritage management and cultural entrepreneurship, support for the mobility of experts through bilateral cooperation at the international level and professional exchange. Activities under Outcome 2 include events developed in bilateral cooperation, such as mutual access to works of art and culture (including touring exhibitions and performances), study visits, etc. Bilateral activities related to the arts and culture of ethnic and cultural minorities (Roma focus) are applicable in Outcome 3. It is envisaged that approximately 50% of all projects supported through the three outcomes will be implemented together with partners from donor countries. The main instruments of the programme under Outcome 3 are organizing events for initiating partnerships, support for study visits between Bulgaria and the donor countries under the Travel Support Scheme and maintaining a partner database.

**In general, it can be concluded that the *Cultural Entrepreneurship, Heritage and Cooperation* Programme is the only external specific financial instrument aimed at solving many current problems in the field of culture. The goals of the programme are adequate to the needs and problems of its target groups.** Indicative is the significant interest in the programme expressed by various stakeholders and potential beneficiaries.

* 1. ***Projects and expected results***

In order to achieve the objectives of the programme, the following areas of support for project proposals have been defined:

• Management, protection and conservation of cultural heritage related to national, regional and local development;

• Documentation and accessibility of culture and cultural heritage;

• Cultural entrepreneurship;

• Attracting an audience in order to emphasize the diversity of culture, better awareness and better education;

• Networking and initiating international cultural exchange.

**The programme is implemented through calls for project proposals and small grant schemes (SGS)**, targeting specific groups and contributing to the achievement of the objectives and expected results of the programme.As a result of the implementation of projects within the programme, the following specific results are expected to be achieved:

1. Preservation and revitalization of cultural heritage sites and generation of revenues from them;

2. Increasing the number of visitors in the supported sites of cultural heritage, museums and cultural activities;

3. Creation of new jobs in the field of culture;

4. Creation of revitalized places at/in institutes for cultural heritage for temporary or permanent exhibitions, museum shops, conference halls;

5. Providing new design and equipment for exhibitions, lighting, shop windows, etc.;

6. Digitization of sites of national cultural heritage, incl. the Roma cultural heritage;

7. Organizing and conducting traveling exhibitions and other traveling events;

8. Development and implementation of entrepreneurial plans in the field of culture;

9. Training and development of workers’ skills in the field of culture;

10. Increasing the number of visitors to cultural and educational events related to minority (including Roma) cultures;

11. Increasing cultural and educational events with a focus on minority cultures and Roma culture;

12. Increasing the exchange of participants working in the field of culture between Bulgaria and the donor countries;

13. Transfer of knowledge and good practices from donor countries to Bulgaria.

**For the period of the mid-term evaluation (until 30 June 2020), no projects under outcomes 1-3 have been launched within the *Cultural Entrepreneurship, Heritage and Cooperation* Programme** (see below 2.1. Status of implementation of the Programme). At the end of elaboration of this evaluation (December 2020) the selection of project proposals for the completed under Outcome 2 "Improved access to arts and culture" has been completed, and the contracts with the selected 10 projects are expected to be signed at the beginning of 2021.

Unlike other EEA FM and NFM Programmes, which achieve their goals through pre-defined projects, in the *Cultural Entrepreneurship, Heritage and Cooperation* Programme one of the main tools for achieving the Programme goals is the development of bilateral partnerships between cultural operators from Bulgaria and from donor countries. This is implemented through Outcome 4 "Enhanced cooperation between beneficiary and donor state entities involved in the Programme" and is funded by the Fund for Bilateral Relations at the programme level. In December 2018, a Call for support for study visits under the Travel Support Scheme within the programme has been announced. Until the mid-March 2020, the PO approved 40 study visits – 26 to Bulgarian cultural operators in the donor countries and 14 to cultural operators from the donor countries in Bulgaria – at a total value of EUR 48,515.00. This is the largest amount compared to all other travel support programmes between Bulgaria and donor countries. As a result of the awareness-raising meetings and visits funded in the framework of travel support at national and programme level in 2019, a significant number of applicant projects with donor project partners are reported under the *Cultural Entrepreneurship, Heritage and Cooperation* Programme – 61 such projects out of a total of 114 applications under the Programme.

Especially with regard to the so-called **Roma focus of the programme**, the expected results are:

- Improving the situation of the Roma population in Bulgaria, using culture and art as a means of developing skills and capacity and/or as a path to education;

- inclusion of the Roma in the society;

- preservation of Roma culture and improvement of access to it (including through digitalization);

- effective counteraction to anti-Roma stereotypes through arts and culture.

According to the Programme Agreement, the PO will use a small grant scheme (SGS) to select high quality projects in this area. Its budget is EUR 1.2 million or approximately a little more than 10% of the total programme budget. Thus, one of the conditions of the Programme Agreement is fulfilled, namely that at least 10% of the Programme budget should be directed to improving the situation of the Roma population through the implementation of SGS projects, as well as other measures under Outcome 1 and Outcome 2 (especially the support for the digitalization of Roma culture). The ambition is to extend the scope of Roma culture and to achieve improved results in this area compared to the BG08 Programme, funded by the FM 2009-2014. SGS funds are focused on "soft" measures with supportive services, supplies and activities, and where necessary support for small-scale infrastructure development and equipment supply is also provided. The aim is to expand the audience among the Roma and other minorities, to involve more Roma and other minorities in the production of events, to show the cultures of the Roma and minorities in general or different combinations of these elements.

* 1. ***Coordination/synergy of the programme***

**An important aspect of the evaluation is the complementarity between the evaluated programme and the measures implemented under other programmes in order to achieve the national and pan-European goals for economic development and social cohesion.** The compliance with national and international strategic and Programme documents and legislation, as well as the coordination with other financial instruments and the existence of synergy with other Programmes and interventions financed by the EEA FM and NFM and others are analysed.

The programme corresponds and is developed in accordance with the main national strategic and legal documents:

* **National Development Programme: Bulgaria 2020**, which shows the link between the EU priorities in the context of the “Europe 2020” Strategy and Bulgaria's national priorities and serves as a basis for the programming of strategic documents for the implementation of both national and EU policies. The development of culture is among the focuses of Priority 1 of the National Programme, and the *Cultural Entrepreneurship, Heritage and Cooperation* Programme corresponds directly to sub-priority 1.5. "Development of culture and arts, cultural and creative industries, expanding access to art and raising the culture of the population", which aims at expanding the cultural horizons of people, develop creative potential, active participation in public cultural life, ensuring accessibility and equal opportunities for consumption of cultural products for all age and social groups in society, which will support the formation of human capital and the socialization of the individual.
* **Protection and Development of Culture Act**, which defines the main principles and priorities of the national cultural policy, cultural organizations and bodies for the protection of culture, its national identity and ways to support and finance cultural activities and artists (compliance with Outcome 2).
* **Cultural Heritage Act**, which regulates the protection and safeguarding of the cultural heritage of the Republic of Bulgaria. There is a significant correspondence of the Programme in regards to Outcomes 1 and 1.2.
* **Law on Creative Fund**s, which regulates cultural funds aimed at developing creative activity and achieving national goals in the field of culture and art (corresponds to Outcome 2 and in particular sub-outcome 2.2).
* **Draft Strategy for the Development of Bulgarian Culture 2019-2029** - a general framework document related to strategic planning and management, which allows the formulation of long-term Programme and management goals in the field of culture; identifies the efforts and resources to be allocated; defines planned indicators through which the progress in achieving the general and specific goals is measured; enables the application of the principles of broad participation in the management of cultural processes, which will unite the views and efforts of the government, civil society and all stakeholders.
* **National Strategy of the Republic of Bulgaria for Roma Integration (2012-2020)** and the related Action Plan, which adopts an integrated approach to reducing the vulnerability of the Roma in the field of education, employment, health, culture, anti-discrimination. Corresponds directly to Outcome 3 of the programme.
* **Framework Programme for Roma Integration in the Bulgarian Society (2010-2020)**, which aims to mobilize responsible institutions and the civil society to combat discrimination, reduce poverty, inequality, social exclusion of the Roma (also corresponds directly to Outcome 3 of the programme).

**Compliance with international strategic and programme documents:**

In the framework of the *Cultural Entrepreneurship, Heritage and Cooperation* Programme, Outcome 1 corresponds to the conclusions of the EU Council on the contribution of culture to the implementation of the **Europe 2020 Strategy** (2011) and the programme takes into account these conclusions. The pre-set results aim at revitalizing cultural values and using them strategically as tools for social development, for strengthening social cohesion and social integration, fighting poverty and the promotion of mutual understanding and respect. The programme also takes into account the flagship initiative of the Europe 2020 Strategy – namely the Digital Agenda for Europe in terms of actively supporting the digitization of Europe's rich cultural heritage (Output 1.2). In relation to Outcome 1, the programme is in line with international conventions in the field of culture, signed by Bulgaria as, for instance, the European Convention on Culture and especially with the latest document "Recommendation on the protection and promotion of museums and collections, their diversity and their role in society", issued by UNESCO. It supports the development of new museum-related policies and regulations to protect the common heritage and promote intercultural dialogue and sustainable development. Outcome 1 of the Programme is in line with the commitments that Bulgaria has made through its membership in international organizations such as UNESCO, the International Council on Cultural Monuments and Landmarks (ICOMOS) and the International Council of Museums (ICOM).

The focus on arts and culture in **Outcome 2** of the Programme takes into account the Europe 2020 Strategy and the "Conclusions of the Council and of the Representatives of the Governments of the Member States, meeting within the Council on the Cultural Work Plan 2015-2018" (2014 / C 463/02).

**Outcome 3** takes into account the connection to the already mentioned Europe 2020 Strategy, as well as the objectives of the national policy related to Roma inclusion and in particular the **National Strategy of the Republic of Bulgaria for Roma Integration (2012-2020)** and the Action Plan for its implementation, which in turn are in line with basic international and European standards and policies in the field of the rights of persons belonging to minorities and non-discrimination.

Regarding the possibilities for **coordination** and **synergy** of the *Cultural Entrepreneurship, Heritage and Cooperation* Programme with other Programmes and measures in the field of culture, the following situation is observed. **At the time of completion of the mid-term evaluation there are no data on the achieved synergetic effect in terms of upgrading activities in the field of culture, funded and developed under the EEA FM and NFM in the previous programming period. At the same time, it should be noted that there is potential for upgrading both in terms of digitalisation and in terms of measures for the Roma.** It is in these two areas that a synergetic effect can be expected in terms of upgrading activities from the previous programming period. The lack of sufficient sources for financing culture in Bulgaria continues to be relevant, emerging as a central determinant of the environment during the implementation of the BG08 Programme of the FM of the CES 2009-2014. It is indicative that during the past programming period the total number of applicant projects in the field of culture (370 projects with a total value of EUR 115 million) exceeded more than 10 times the number of funded projects (33 projects with a total value of EUR 15 million).

**In Bulgaria, there is no operational programme under the European Structural Funds to finance projects based on planned outcomes in the current *Cultural Entrepreneurship, Heritage and Cooperation* Programme.** Potential for synergy and coordination could be sought under the European Commission's Framework Programme for Support of Culture and the Audio-visual Sector "Creative Europe", but as far as there is no data on the participation of Bulgarian cultural operators in consortia that have won projects under this EC Programme, the possibilities for synergy and complementarity remain hypothetical.

**Potential opportunities for coordination and synergy can be outlined in relation to the budget of the National Culture Fund (NCF), which supports the creation, development and dissemination of Bulgarian culture in the country and abroad.** Among the announced NFC Programmes are "Cultural Heritage", "Audiences" and "Socially Engaged Art", which are thematically related to the projects funded by the *Cultural Entrepreneurship, Heritage and Cooperation* Programme. At the same time, it should not be forgotten that in these thematic areas NFC finances micro-projects with a budget of up to EUR 10,000.00, while the minimum budgets under the *Cultural Entrepreneurship, Heritage and Cooperation* Programme of the EEA FM and NFM 2014-2021 are EUR 150,000.00 for projects under Outcome 1, EUR 50,000.00 under Outcome 2 and EUR 25,000.00 (maximum EUR 75,000,000) under the SGS for Outcome 3, i.e. in a sense, the two are not comparable in terms of funding and scope of the expected results. The analysis does not reveal available mechanisms of coordination and synergy between the *Cultural Entrepreneurship, Heritage and Cooperation* Programme and the NCF-funded programmes.

**It is the "Roma focus" of the programme which allows to the greatest possible extent to look for coordination and synergy with other EEA FM and NFM Programmes and with measures under other national and European programmes.** The activities implemented under Outcome 3 are expected to contribute to the Roma inclusion and improve the situation of the Roma population. Hence, this is part of the overall plan to improve the situation of the Roma in the EEA FM and NFM for 2014-2021. In this respect, the NCU is supposed to impose and support the coordination and complementarity of activities and to ensure the avoidance of duplication of funding for activities under the “Roma focus” of the programmes. Given the specifics of its areas of implementation, the *Cultural Entrepreneurship, Heritage and Cooperation* Programme can seek synergies mainly with the activities of the *Local Development and Poverty Reduction and Improved Involvement of Vulnerable Groups* Programme. As the call for Outcome 3 has not yet been implemented and the first contracts for Outcome 2 were signed only in December 2020, it is not possible to say to what extent and in what aspect there would be complementarity and coordination between the activities on the "Roma focus" of the two programmes. Also, within the *Cultural Entrepreneurship, Heritage and Cooperation* Programme itself, projects related to cultural diversity and mutual understanding will be supported by other results of this programme.

**On the basis of the evaluation of the objectives, design and coordination of the *Cultural Entrepreneurship, Heritage and Cooperation* Programme, it can be concluded that:**

* The programme has been developed in accordance with the national and European strategic and programme documents in the field of culture, taking into account the experience of the previous programming period (Programme BG08 "Cultural Heritage and Contemporary Art" under FM 2009-2014).
* The priorities, eligible project activities and approaches set in the macro framework of the programme, correspond to the needs, problems and limitations of the main target groups of the programme and are elaborated in a process of consultation and coordination with stakeholders, including potential beneficiaries of the programme.
* At the moment there is no need to supplement or change the goals and activities of the programme.
* Regarding the only structure in Bulgaria that finances initiatives in the field of culture - NCF, the NFP and the PO make sure to avoid double funding of projects. As long as there are no other operational programmes and mechanisms in Bulgaria in this area, there is no relevance in discussing the Programme’s complementing or coordinating with other programmes and instruments.
* Since no projects under the *Cultural Entrepreneurship, Heritage and Cooperation* Programme have been launched during the evaluation period and the first projects are just starting to be implemented, no link or synergy can be identified with other EEA FM Programmes and measures, although there are discernible opportunities in this direction.
1. **Assessment of the progress, delays, and risks in the implementation of the programme**

In this section, the analysis focuses on the following key evaluation issues:

* What is the progress made (as of June 30, 2020) under the programme in terms of negotiation and implementation of measures, including in terms of achieved results?
* Are there any deviations/delays from the initial programme implementation schedule? What is the reason for this and what is the potential impact of this delay on the successful implementation/finalization of the interventions and the achievement of the pre-set results?
* Is there a realistic up-to-date plan for the implementation of the measures under the programme?
* What problems have been identified in terms of: project design and rogramming of interventions, selection of project proposals, contracting, monitoring and reporting, financial control and payment, prevention systems, risk management systems, registration and reporting of irregularities, procedures on monitoring, evaluation and reporting on the implementation of the Programme, information and communication measures, etc.?
	1. ***Programme implementation status***

**For the evaluation period (i.e. until June 30, 2020), within the *Cultural Entrepreneurship, Heritage and Cooperation* Programme no projects have been launched under Outcomes 1-3.** As of December 2020, there are 10 selected projects under Outcome 2 "Improved access to arts and culture" and contracts are expected to be signed in early 2021.

For the period of the mid-term evaluation, two calls have been announced under the *Cultural Entrepreneurship, Heritage and Cooperation* Programme. In December 2018, a Call for Support for Study Visits under the Travel Support Scheme (Outcome 4 of the Programme) has been announced. This is within the frame of the Bilateral Relations Fund, which goes beyond the subject and object of this evaluation. By mid-March 2020, the PO had approved 40 study visits of Bulgarian cultural operators in the donor countries and of cultural operators from the donor countries to Bulgaria. In March 2020, the examination of applications for study visits was temporarily suspended due to the epidemiological situation and the introduction of a state of emergency; the acceptance of new applications was not resumed during the evaluation period.

In January 2019, the PO organized a matchmaking event for cultural organizations from Bulgaria and the donor countries. The event aimed at creating opportunities for fruitful partnerships between Bulgarian cultural organizations and those of donor countries and was attended by 24 participants from donor countries and 178 from Bulgaria.

In September 2019, the PO announced the first call for project proposals under Outcome 2 "Improved access to culture and arts" with a deadline of January 10, 2020. In the same month the PO ran an extensive ten-day information campaign involving representatives of over 250 organizations and cultural institutes; the information meetings were held in ten cities of the country. The Call under Outcome 2 invited altogether 114 project proposals. In May 2020, the procedures for administrative compliance and eligibility were completed and 53 of the submitted projects moved to the stage of financial and technical evaluation. In early December 2020, 10 selected projects and 37 reserves have been announced and contracts are to be signed shortly.

Regarding the call under Outcome 1 "Accessible cultural heritage sites", at the beginning of December 2020, the PO has been involved in the clarification and coordination of the Guidelines for Applicants with FMO, the Arts Council in Norway and the NFP. The opening of the Call under Outcome 1.1 "Presentation of cultural heritage in revitalized, restored and renovated spaces" was scheduled for March 2020, but was postponed for November - December 2020. However, at the time of elaboration of the mid-term evaluation (end of December - beginning of January 2021) the Call has not been opened yet.

The call for project proposals under Outcome 1.2 "Cultural heritage objects made accessible / Digital Accessibility of Cultural Heritage Sites" has been prepared and coordinated with the NFP, the Arts Council - Norway and the FMO, but has not been yet opened for application.

It was decided to combine the two calls under Outcome 3 "Improved awareness of arts and culture of ethnic and cultural minorities with a specific Roma focus" in one call, which will be opened in the period April-June 2021. The preparation of the invitation also takes into account the results of the Round Table on Grants of the EEA and NFM 2014-2021 organized by the NFP and held in December 2019 under the title "Challenges for implementation, monitoring strategies, active participation and empowerment of the Roma - sharing experiences and good practices”.

Given the development of the Covid-19 situation and the limitations arising from the epidemiological situation and emergency measures, the PO introduces more flexible options in the guidelines to be announced and allows certain cultural events to be held remotely or digitally.

**On the basis of the evaluation, the following conclusions can be drawn regarding the status of the *Cultural Entrepreneurship, Heritage and Cooperation* Programme as of 30 June 2020:**

First, a call for proposals under Outcome 2 "Improved access to culture and the arts" has been prepared. The invitation was open for applications from September 2019 until January 2020. Of the 114 submitted project proposals, 53 passed the procedure for administrative compliance and eligibility. After passing the financial and technical evaluation, 10 of the project proposals were selected for financing, and 37 were reserves. The contracts are to be signed.

Second, the deadlines for opening the Calls for project proposals under all Outcomes of the programme have been postponed (including the second call under Outcome 2).

Third, the guidelines for calls under sub-outcome 1.2 "Cultural heritage objects made accessible/ Digital Accessibility of Cultural Heritage Sites" are in the process of being clarified and agreed with the NFP and the FMO. For both sub-outcomes, there were postponements in the call opening for later moments, when the calls for project proposals had not started again.

Fourth, a restructuring was carried out under Outcome 3 "Improved awareness of the arts and culture of ethnic and cultural minorities with a specific Roma focus", where the planned two calls for proposals were combined into one call for proposals and the deadline for its opening was extended to a further moment in time.

Fifth, changes have been made to the Guidelines for Project Applicants to allow greater flexibility in the implementation of projects, so as to circumvent or minimize the restrictions associated with the epidemiological situation and the reduced social contacts.

**The evaluation of the implementation status of the *Cultural Entrepreneurship, Heritage and Cooperation* Programme leads to the following conclusions:**

* As of the final date of the mid-term evaluation period (June 30, 2020) there are no projects that have reached the actual implementation phase.
* There is a delay in both the opening of calls for proposals under the programme outcomes and a delay in the selection procedures for the only open call within the programme (see also item 2.2. below).
* In its assessment of the programme implementation, the DPP notices that although the Programme Agreement was signed relatively early, all other national cultural Programmes that concluded their agreements later have already caught up and are more advanced in their implementation than the *Cultural Entrepreneurship, Heritage and Cooperation* Programme.
* As a result of the disrupted schedule of the programme implementation, some restructuring and changes in it were carried out: first, the changed number of calls under Outcome 3, where the two originally planned calls were combined into one; second, options for remote or digitized cultural events have been introduced in the application guidelines.
* The overall pace of the programme implementation is delayed, and postponements are offset by reducing of project implementation period for all three outcomes from 36 to 24 months. This may negatively affect the achievement of some of the programme results (especially those related to audience development and inclusion and improvement of the Roma).
	1. ***Changes, deviations and delays in the programme implementation***

Since the launch of the *Cultural Entrepreneurship, Heritage and Cooperation* Programme, there have been several changes, mainly related to deadlines and delays. Thus, at the end of 2019 the schedule of calls for proposals announced in the Programme Agreement, has been amended as follows:

* The call under Outcome 1.1 "Restoration and Revitalization of Cultural Heritage", scheduled for the second half of 2019, has been postponed to the second half of 2020.
* The call under Outcome 1.2 "Accessible cultural heritage sites", also scheduled for the second half of 2019, has been postponed to the first half of 2020.
* The first call under Outcome 2 "Improving access to arts and culture", scheduled for the first half of 2019, was announced in September 2019.
* The second call under Outcome 2, scheduled for the second half of 2020, was planned to open in September 2020.
* The SGS calls under Outcome 3 "Improved awareness of the arts and culture of ethnic and cultural minorities (focus on Roma)" are two, planned for the first half of 2019 and for the first half of 2021. The first is postponed to April 2020 and was not open at that time, and the second does not change.

Only a few months after these first changes in the initially imposed schedule for calls under the programme, the development of Covid-19 situation and the imposed restrictions for gathering people in public places led to an additional postponement of the already revised deadlines. In 2020 none of the calls planned for opening in that year were announced. The calls under Outcomes 1.1, 1.2 and the second call under Outcome 2 were postponed, as well as the first SGS call under Outcome 3. The latter was combined with the second call, scheduled for April 2021. Given the imposed formal and informal restrictions on social contacts, it is not clear how the information campaign, which is supposed to happen around the time of the opening of the call, will take place.

In September 2019, at the opening of the first call under Outcome 2, it became necessary to extend the deadline for submitting project proposals. Due to an error in the programme, the deadline of the call was extended from December 3, 2019 until January 10, 2020. After the closing of the call, the process of evaluating the project proposals also experienced some deviation from the set deadlines.

The PO has planned to monitor projects under the closed first call for proposals under Outcome 2 at the end of the second half of 2020. The declared state of emergency in Bulgaria due to Covid-19 postponed this monitoring for next year, the project evaluation was extended and that has changed the whole schedule for signing grant contracts with the beneficiaries.

Restrictions caused by the emergency pandemic situation led to changes in the schedule or manner of implementation of the activities under the contracted projects, to the postponement of calls for project proposals, extension of deadlines for submission of applications and evaluation procedures. The launching of calls under all the outcomes of the programme has been made difficult.

**There is a delay in the initially adopted schedule for the implementation of the programme, and then as a result of the Covid-19 situation the updated schedule is not complied with once again. This applies in particular to activities aiming at improving the social inclusion of the Roma and to raise awareness of the arts and culture of ethnic minorities (Outcome 3).**

* 1. ***Identified problems in programme management***

The PO elaborates and submits for approval several versions of the Management and Control System (MCS) at programme level. The initial version of MCS was presented in March 2019. In April 2019 the Audit Authority submits to the PO a report on the compliance of the MCS. Following the instructions in the report, in June this year, the PO sends a second version of the MCS for approval to the NFP and the Audit Authority. According to an audit report, the second version of the MCS was approved by the NFP in July 2019. The MCS underwent additional chenges in July 2020 and its current version dates from December 2020. The system establishes a clear and detailed procedure for monitoring of future approved and funded projects, as well as of the programme results.

Within the programme, monitoring is planned towards the end of the second half of 2020 for projects under the closed first call for proposals under Outcome 2. The delay in activities, the extension of the time for project evaluation and the delayed signing of contracts lead to changes in the entire schedule for signing contracts and postpones the monitoring for the next 2021.

According to the regular audits within the EEA FM and the NFM, no irregularities have been identified in the programme.

The following problems and operational risks have been identified in relation to the management of the *Cultural Entrepreneurship, Heritage and Cooperation* Programme:

* Personnel problems within the PO team: two of the main participants in the preparation of the Programme documents and the organization of the information campaign have left the team – the Programme manager and one of the Programme coordinators. There is also a high turnover among the lawyers in the Ministry of Culture. These changes in the team (also noted by the DPP Council of the Arts in Norway) have had a negative impact on the Programme's management, including delays in the opening of some of the planned calls.
* Management issues related to the impact of Covid-19 restrictions in the field of culture. Large periods in which any mass events are prohibited caused revisions and deviations from the original schedules, thus leading again to delays.
* As a consequence of the above problems, several changes have been made in the schedules of the rogramme, as well as a number of consecutive delays in the opening of the calls under the programme outcomes.
* Insufficient administrative capacity and expertise of the PO in regard to the elaboration of the guidelines:

– due to a technical error in the documents, it became necessary to extend the deadline for submitting applications for the only announced call within the programme (however, this also shows opportunities for "learning from experience");

– complicated guidelines for the open call under Outcome 2, which leads to the rejection of a large number of project proposals (approximately 60% of all submitted projects), due to formal reasons, e.g. incorrectly filled-in documents or missing information (this is indicated by DPP too);

– unnecessarily complicated procedures for evaluation of the projects proposals, which leads to some of the delays (explicitly noted by the DPP);

– postponing the second call under Outcome 2 in order to adjust the guidelines according to the experience of the first call, to remove requirements that unnecessarily hinder the applicants and worry the donor countries partners and to drop the requirement for submitting documents that can be obtained ex officio.

* Delays in the programme have a negative impact on the target groups and bilateral cooperation in terms of the implementation of the tasks and the sustainability of the achieved results.
* There is a discrepancy in the translation and wording of outcome 1.2. of the Programme. In the Programme Agreement and the Concept Note, which are in English, the wording of sub-outcome 1.2 is "Cultural heritage objects made accessible", and digitalization is indicated as one of the indicators for achieving this result. Digitization is mentioned again as one of the indicators in the MCS of the implementation of the *Cultural Entrepreneurship, Heritage and Cooperation* Programme (version 3 of December 2020). In the Bulgarian translation of the wording of sub-result 1.2[[8]](#footnote-8), as well as according to the overall understanding of the PO (expressed in the interview with the Programme manager, and in the PO notes on the draft version of the mid-term evaluation) digitalization is presented as a defining characteristic of sub-outcome 1.2 from the very beginning, and the wording in Bulgarian is "Digitally accessible cultural heritage sites", which does not accurately translate the English "Cultural heritage objects made accessible". It would be good to have an explanation or clarification for the discrepancy between the wording of sub-score 1.2 in Bulgarian and in English.
1. **Assessment of the effectiveness and efficiency of the programme**

In this section, the implementation of the programme is analysed with a focus on the following key evaluation issues:

* Is the support provided under the programme focused on the most effective and efficient interventions in terms of the goals of the two financial mechanisms, as well as the needs and priorities of Bulgaria in the programming period?
* To what extent have the results, indicators and objectives been achieved or expected to be achieved within the programme? Is there a risk of not achieving the set results and planned values of the indicators and what factors (internal or external to the programme) cause this risk?
* Are the necessary resources (financial, in terms of time, administrative capacity, procedures, etc.) available to ensure the effective and efficient achievement of the pre-set results, indicators and goals?
* Has the programme operator identified a risk of delay in the implementation of interdependent measures and interventions and how is this risk addressed?

**Due to the delay in the implementation of the projects and measures under the Programme and given the fact that the first contracts are to be signed in early 2021, no real assessments of the effectiveness and efficiency of the programme can be made.** In terms of effectiveness, the analysis is focused primarily on assessing the measurability, feasibility and probability of achieving the objectives and expected results of the programme, as well as the risks of not achieving them. In terms of efficiency, an assessment was made of the adequacy of the total amount of financial assistance provided under the EEA FM, the way of using the financial resources, proposals for relocation of funds were studied.

* 1. ***Assessment of the effectiveness***

**The *Cultural Entrepreneurship, Heritage and Cooperation* Programme has the potential to create added value by supporting the development and implementation of innovative models and tools in the field of cultural entrepreneurship and the preservation of cultural heritage and improving the situation of minority representatives (with a focus on the Roma) by involving them in the presentation and dissemination of their culture.** These models and tools relate to elaboration of strategies for revitalization and preservation of cultural heritage sites so as to bring income to cultural institutions and municipal structures; increasing the visibility and activating the presentation of cultural heritage sites, museums and cultural activities; increasing the capacity for cultural entrepreneurship of the operators in the field of culture; combining cultural and educational activities in the process of Roma inclusion, etc.

**The programme replicates and upgrades good practices and approaches implemented under the BG08 Programme of the EEA FM and the NFM in the period 2009-2014,** for example in the field of digitalization.

To measure the extent to which the goals and objectives of the *Cultural Entrepreneurship, Heritage and Cooperation* Programme have been achieved, as well as that of the expected results of the funded projects, a system of indicators has been developed to monitor the progress in the programme. The values of the main indicators under Outcome 1 are to be defined, and within 6 months after the end of the selection procedure following the calls under this outcome the PO has to submit to FMO basic values of the indicators for approval.

Due to the delay in the start of the projects under this programme, the PO’s monitoring of the implementation of the projects and the achievement of the target values of the indicators is forthcoming.

**The planned programme initiatives are adequate to the needs and priorities of Bulgaria in the programmeming period and largely correspond to the problems and needs of the target groups of the programme, but the achievement of goals and expected results is at risk due to long delays in the programme implementation.**

* 1. ***Evaluation of the financial resources and efficiency of the programme***

The financing of the programme is assessed both in terms of the adequacy of the total amount of financial assistance provided under the EEA FM to achieve the objectives and priorities of the Programme, and in terms of its compliance with the needs of the target groups.

The total budget of the programme amounts to EUR 11 764 706, of which the EEA FM contribution amounts to EUR 10 000 000 and the national co-financing is EUR 1 764 706. The Programme Agreement stipulates that the maximum level of funding for infrastructure ("firm" measures) must be up to 60% of the total eligible costs of the programme. Also, at least 10% of the total eligible costs of the programme must be aimed at improving the situation of the Roma population, which is reported through both quantitative and qualitative data.

Despite the fact that there is only one completed call, it can be argued that **the interest in this programme is very high.** Due to the lack of sufficient sources for the financing of culture in Bulgaria, the trend from the previous programmeming period (BG08) is being reproduced, when the project applications in the field of culture are over ten times more and amount to several times a higher budget than the actually agreed and financed projects. In this programming period, in the only open and closed call under Outcome 2, 114 project proposals were submitted, 53 of which were approved to the stage of financial and technical evaluation. 10 projects have been selected and 37 are listed as reserves. The total value of the contracts is over EUR 1,500,000.00, which is half of the amount provided for this outcome under the Programme Agreement.

**The amount of financial assistance provided under the EEA FM and NFM for the *Cultural Entrepreneurship, Heritage and Cooperation* Programme can be assessed as significant, consistent with the programme objectives and needs of the target groups. Due to the lack of other external funding and the insufficient volume of national funding, although significant, the volume of financial assistance in the field of culture does not correspond to the real demand for funding in this area.**

* 1. ***Risks for the implementation of the programme***

Based on its experience from the previous implementation of the programme and from the previous Programmeming period 2009-2014 of the EEA FM and the NFM, the PO identified several main risks that could affect the programme and the extent to which the expected results will be achieved, as well as accompanying mitigation measures:

* In the online interview, the PO identified as a serious risk to the programme implementation the prolonged emergency situation due to the Covid-19 pandemic. Especially in the field of culture, where a number of activities cannot be carried out remotely, restrained personal contacts and cancelled or postponed trips in Bulgaria or in the donor countries pose a serious risk for the implementation of the programme.
* Key activities from approved project proposals are dropped out due to the impossibility to implement them (cutting off of traveling exhibitions as an activity set in the guidelines under Outcome 2, according to which at least two traveling exhibitions in different areas of cities were envisaged).
* Political uncertainty arising from the upcoming parliamentary and presidential elections in 2021. This could lead to changes in the programme management team and further deepen the delays in its functioning. According to the programme manager, if after the elections there are changes in the PO leadership, a possible change of the head of the programme (the position is assigned to the Deputy Minister of Culture) will put at risk its implementation.
* Personnel problems and problems with the administrative capacity of the PO (see 2.3 above).
* The PO also identifies the risk of not receiving sufficient and quality project proposals under the SGS with Roma focus, despite the increased interest in the programme as a whole.

**In the Strategic Report for the period 01.08.2019 - 31.07.2020 the NFP also identifies other specific risks related to the management of the Programme:**

* *Lack of sufficient staff with experience in programme and project management*. To mitigate this risk, regular meetings are held with the head of the PO on topics related to the administrative capacity of the staff and issues related to the implementation of the programme. Currently, 18 experts are working on the programme with a very high commitment expressed by the head of the organization. The overall strategy is to hold regular meetings to discuss issues related to administrative capacity and to provide assistance in managing the programme where necessary.
* *Delays in launching the open calls and the evaluation of the received project proposals.* To mitigate this risk, a monthly monitoring of the implementation of the programme is carried out, the issue is also discussed at coordination meetings between the PO and the NFP on the work plan for the implementation of the programme. The PO has been requested to make an updated schedule for calls for project proposals. The planned future responses are monthly monitoring of the implementation of the programme, as well as combining some of the calls for instance the calls under Outcome 3) in one call, so as to reduce the administrative burden on the PO.
* *Insufficient quality of the documentation related to the calls for proposals, which can lead to a large number of rejected projects and complaints from potential beneficiaries.* To mitigate this risk, *ad hoc* meetings are organized with the NFP on various issues of the calls. It is planned to carry out detailed inspections and provide assistance at a preliminary stage of preparation of project proposals, before the texts of the calls are submitted for official approval by the NFP.
* *The potential new peak of the Covid-19 pandemic in the autumn-winter of 2020-2021 poses a serious risk to the projects under Outcome 2 and Outcome 3 (Roma focus).* NFP requires that the PO should assess the risks associated with Covid-19 and possible ways to mitigate them. The Risk management strategy assumes that the NFP is in regular contact with the PO to discuss changes to the indicative plan for calls for proposals. Possible changes in the Programme Agreement are also discussed, e.g. with regard to the period of implementation of the projects, postponement of the starting date of the contracts and regular revision of the indicators related to the physical presence at cultural events.
1. **Roma focus of the programme**

**This section presents the results of the analysis of several key evaluation issues related to the goal of improved Roma inclusion:**

* To what extent are the objectives for ensuring Roma focus under the *Cultural Entrepreneurship, Heritage and Cooperation* Programme being met?
* Is there compliance with the national policies for Roma integration ensured (in regard to the National Strategy of the Republic of Bulgaria for Roma Integration 2012-2020; National Action Plan for the period 2015-2020 for the implementation of the National Strategy of the Republic of Bulgaria for Roma integration 2012-2020)?
* Does the consultation process meet the needs of financial support schemes and the Roma as the target group?
* To what extent is there complementarity and synergy with other projects and programmes, as well as upgrading results related to the Roma focus on the EEA FM from the previous programming period (2009-2014):
* in the implementation of integrated measures for local development and poverty reduction through education, employment and health (including initiatives aimed at the inclusion and integration of vulnerable groups);
* how the experience of identical procedures at national level and foreign practices has been used;
* What type of monitoring is envisaged: reporting on the participation of the Roma in the implementation of activities or the number of products representing Roma culture and how this participation has contributed to real change in the impact of the projects and the programme.
	1. ***Fulfilment of the objectives for the Roma focus of the programme***

**The *Cultural Entrepreneurship, Heritage and Cooperation* Programme of the EEA FM and NFM has a clear Roma focus.** Minority cultures (including Roma culture) were identified as a major cultural challenge during the preliminary stakeholder consultations in April 2017, which involved representatives of 24 national and local organizations and other cultural institutes. This priority is clearly outlined in the Memorandum of Understanding and the Programme Agreement in the field of culture for the current programming period of the EEA FM and the NFM.

During this programming period, the experience is used and the achievements of BG08 2009-2014 "Cultural Heritage and Contemporary Art" are built upon it. In the 2009-2014 period the condition was set that each contracted project should direct at least 10% of all eligible costs to improve the situation of the Roma population. During the previous programming period, many Roma artists were involved in artistic events carried out under the "Presentation of contemporary art and culture presented and reaching a wider audience" SGS, activities for digitalization of cultural heritage related to the Roma have been implemented and some members of the Roma community participated in the work on construction infrastructure under the other outcomes.

The *Cultural Entrepreneurship, Heritage and Cooperation* Programme fulfils the Roma focus in different directions and in various ways:

First, the Roma are addressed as direct participants in programme activities. People from different minority or ethnic groups constitute a specific target group of the programme the emphasis being on the Roma – performers, students, entrepreneurs, students and youth.

Second, the programme documents set out various measures and interventions aimed at improving the situation of the Roma, their social inclusion and empowerment through the presentation and promotion of Roma culture, digitization of Roma cultural heritage sites, increasing access of the Roma to cultural events and sites, developing their skills for cultural entrepreneurship and project work, and others.

**Unlike most other programmes in the EEA FM and NFM, in the *Cultural Entrepreneurship, Heritage and Cooperation* Programme the Roma focus is present in all the outcomes** – both as participants and targets, as well as in terms of the nature of the planned activities, which include various aspects of the preservation, presentation and dissemination of Roma culture. Lleading in this respect is Outcome 3 "Improved awareness of the arts and culture of ethnic minorities (Roma focus)”, which aims to promote greater social cohesion by improving understanding between cultures of the majority and the minorities with a focus on the Roma. The implementation of activities under other outcomes can also be related to the Roma focus. For example, in Outcome 1.2 in relation to the digitization of cultural history and heritage, the Roma culture is explicitly mentioned.

Third, the Programme Agreement stipulates that at least 10% of the total eligible costs of the Programme must be aimed at improving the situation of the Roma population. This represents only EUR 117,647; however, the amount for SGS under Outcome 3 is EUR 1,020,000. Given that the Roma focus is also accomplished through other measures under Outcome 1 and Outcome 2, within the programme the total amount aimed at improving the situation of the Roma population may reach a larger share of the overall eligible costs of the programme. The Roma focus can significantly support the digitalization of Roma culture. The fulfilment of this condition will be reported in the annual and final programme reports;

It remains to be seen how the merging of the two planned calls under Outcome 3 in a single call will affect the achievement of the goals related to the Roma focus. At the same time, the delay in the launch of the call for project proposals under SGS, which both at the end of the evaluation period (30 June 2020) and at the end of 2020 has not started yet, creates a risk for achieving the expected results.

* 1. ***Programme consistency with the national policies for Roma integration and synergy with other programmes and projects with Roma focus***

**The proposed initiatives and measures under the *Cultural Entrepreneurship, Heritage and Cooperation* Programme are generally in line with the National Strategy of the Republic of Bulgaria for Roma Integration 2012-2020 (NSRBRI), with the National Action Plan for the period 2015-2020 for the implementation of the NSRBRI and with the Framework Programme for Integration of the Roma in the Bulgarian Society (2010-2020).** The Programme addresses priority 6 of the Culture and Media Strategy, where the main goal is to create conditions for equal access of the Roma community to public cultural life and preservation and development of Roma traditional culture. The Roma focus of the programme has a clear connection with priority 1 "Education" (especially in its part for providing quality education in a multicultural educational environment), as well as with priority 4 "Employment" (addressing Roma access to employment through the small grant scheme to create jobs).

The objectives and activities of the *Cultural Entrepreneurship, Heritage and Cooperation* Programme build on the results related to the Roma focus on the EEA FM from the previous Programmeming period (2009-2014). Coherence may also be sought with the financial support provided by the ESIF under the European Social Fund and in particular for support for employment and mobility, where the Programme may have rather complementary functions.

* 1. ***Consultative process and involvement of Roma organizations in the planning and implementation of the programme***

**The NFP and the PO seek to establish coordination and interaction among the various Programmes of the EEA FM and the NFM 2014-2021 related to Roma inclusion by involving in the consultation process all stakeholders concerned with the social inclusion and empowerment of the Roma at the national and European level.** The NFP successfully cooperates with various representatives of Roma NGOs, involving them in activities that are genuinely aimed at Roma inclusion. Representatives of Roma NGOs actively participate in the consultative meeting of stakeholders on Programmes with a focus on the Roma, held on May 25, 2017. The proposals made by Roma NGOs for specific measures are reflected in the Concept notes of the respective programmes**.**

A good example of involving representatives of the Roma community in the consultation process is the Round Table organized in December 2019 by the NFP in partnership with the FM Office “Measures for Roma Integration under the EEA and NFM FM 2014-2021 - implementation challenges, monitoring strategies, active inclusion and empowerment of the Roma – exchange of experience and good practices". The Round Table was attended by more than 120 representatives of key stakeholders involved in Roma inclusion at the national and European level, including Roma and pro-Roma civil society organizations, municipalities, Programme operators, project promoters, international partner organizations, DG Justice of the European Commission, the Council of Europe, the EU Agency for Fundamental Rights, ESIF governing bodies, involved ministries, the National Association of Municipalities in the Republic of Bulgaria, the Commission for Protection against Discrimination, etc. The Round Table provided a platform for sharing experiences and good practices regarding the social inclusion and empowerment of Roma.

Since the calls under Outcome 3 of the programme are not yet open, it remains to be seen how and to what extent the potential of the programme to support the social inclusion of the Roma will be realized by improving the inclusion of the Roma in public cultural life, stimulating and supporting education and increasing employment.

* 1. ***Risks of not achieving the goal of Roma inclusion and empowerment***

**Some aspects of the socio-political context in Bulgaria may have a negative impact on the effectiveness of the implementation of the national policy framework for Roma inclusion and the achievement of the goal of the *Cultural Entrepreneurship, Heritage and Cooperation* Programme for social inclusion and empowerment of the Roma.** There are cases ofpoliticization of the Roma issue, especially in the pre-election situation, anti-Roma sentiments were generated, protests were provoked in various settlements, and in some cases ethnic hate crimes were committed. The public debate is increasingly dominated by proposals for the “integration” of the Roma through strict administrative and penal approaches, thus forming a negative public opinion towards the Roma.

**At this stage of the development of the programme it is not clear how the PO will engage representatives of the Roma community to participate in the implementation of the projects supported by the EEA FM.** There is a risk that when the call under Outcome 3 is open, there will not be enough quality project proposals, or the Roma will be mainly in the position of passive recipients of implemented measures and activities. Potential risks are also hidden in the merging of the planned two calls under Outcome 3 in one call and its postponement. Shortening the implementation period of approved projects from 36 to 24 months to compensate for the delay may lead to difficulties in the implementation of some of the project activities (especially those related to infrastructure and/or public procurement) and insufficient sustainability of the expected results.

## 3.5 Analysis and Assessment of the *Home Affairs* Programme

The analysis and assessment of the *Home Affairs* programme are connected to the more general objective of making an intermediate assessment of all programmes financed by the FM of the EEA and NFM 2014-2021.

The **specific objectives** of the assessment of *Home Affairs* programme are:

* To assess the execution of the programme based on the evaluation of the objectives, outcomes and results which are to be achieved after the completion of the financed initiatives/projects
* To assess the expediency, effectiveness and efficiency of programme *Home affairs* in accounting for its specific target groups and concrete objectives
* To evaluate the achieved results of the interventions under the programme "Internal Affairs", as well as the probability of achieving or the risk of not achieving the planned results under the individual programmes;
* To evaluate identified problems and good practices (strengths and weaknesses) from the implementation of the *Home affairs* programme as well as to formulate recommendations aimed at overcoming the identified problems that may serve in the process of making sound management decisions.

The evaluation is based on the progress in the implementation of the *Home affairs* Programme for the period from the signing of the Programme Agreement between the National Coordination Unit (NCU) and the EEA FM Office until 30 June 2020, assessing the possibility of achieving the set objectives and results within the deadline for project implementation - 30.04.2024

* + - 1. **Objectives, design, and coordination of the programme**

This section addresses the following key issues in the evaluation of the implementation of the *Home affairs* programme:

* To what extent the priorities, the selected interventions, and the applied approach (eligible activities, costs, beneficiaries, etc.) are appropriate and correspond to the needs, problems and limitations of the target groups of the programme?
* To what extent do the programme's interventions complement the support provided under other programmes and financial instruments (in particular ESIF funding and other EU-funded programmes)?
* What are the links and synergies between the programme and the measures implemented under other programmes in achieving national and European goals for economic development and social cohesion?

***1.1. Objectives of the programme and compliance with the needs of the target groups***

The *Home Affairs* programme covers a system of objectives in three programme areas and aims to increase the capacity and ability of national institutions to pursue their work in the areas of asylum and migration, international police cooperation and the fight against crime, prevention and countering police corruption, asset recovery in Bulgaria, and the countering of economic crime. Another important goal of the programme is to increase the capacity of institutions in the field of police cooperation, including organised crime and human trafficking. Through its synergy with the Justice Programme, the programme aims to strengthen the legal chain in terms of access to justice, good governance, gender-based violence and human trafficking.

The *Home Affairs* programme covers three programme areas and one additional line of work:

* PO 18 - Asylum and migration
* PO 20: International police cooperation and crime prevention.
* PO 16: Good governance
* Improving the situation of the Roma population

In relation to minority groups, the *Home Affairs* programme envisages about 10% of the resources spent to improve the situation of the Roma population in the country, as the projects include, directly or indirectly, the prevention and counteraction of crime related factors on the functioning of the Roma community, and also the prevention of radicalisation, extremism, violence and hate speech.

**Programme interventions include a set of measures that can be divided into three groups**. First, measures covering the improvement of the material base and technical equipment of the divisions of the Ministry of Interior (MoI). Second, measures related to the training of MoI staff in order to increase their capacity in areas such as police investigation, combating trafficking in human beings and excise goods, combating corruption and organised crime, working in a multicultural environment and taking into account the specific cultural characteristics of the Roma population, work in the field of migration and asylum, etc. Third, raising the awareness of the Roma population on migration issues and various forms of crime with a view to preventing radicalisation, violence, extremism and hate speech.

In the course of the development of the programme, the experience from the implementation of programmes and projects supported by the FM of the EEA and the NFM in the period 2009-2014 has been taken into account.

In connection with the evaluation of the goals and priorities of the programme, information was collected on several main topics:

1. Correspondence of the goals and priorities of the programme with the problems and needs of the target groups.
2. Adequacy and feasibility of the objectives, approach and activities of the programme.
3. Proposals for changing/supplementing the goals and activities of the programme.

**The goals of the programme can be assessed as adequate to the needs and problems of target groups, Ministry of Interior officials, and the Roma community**. The main objectives of the programme are developed in consultation with stakeholders and international partners of the programme.

The objective of the programme, in addition to results in the field of law enforcement and crime prevention, is to establish mutual trust, a spirit of cooperation and relations of cooperation and partnership between the relevant institutions in Bulgaria and Norway.

The programme is implemented in close cooperation with foreign partners - the Ministry of Justice and Public Security (Norway), the Norwegian Directorate of Immigration, the Norwegian Refugee Council, the Norwegian Asylum Seekers Organization,

At the project level close cooperation is maintained with the following donor country partners: The National Crime Investigation Service (KRIPOS) at the National Police Directorate. Norway, Oslo District Police, National Police Office for Immigration (NPIS), Organization for Security and Cooperation in Europe (OSCE) / Office for Democratic Institutions and Human Rights (ODIHR).

***1.2 Projects and expected results***

In the stakeholder consultations, four main areas of the programme were identified. In these areas, projects have received financial support to achieve the following outcomes:

1. Outcome 1 (PO 18): Increased capacity of national authorities in the field of asylum and migration
2. Outcome 2 (PA 20): increased capacity of law enforcement institutions in the field of crime investigation and prevention
3. Outcome 3 (PO 20): Improved situation of the Roma population
4. Outcome 4 (PO 16): Increased capacity of Bulgarian institutions to combat economic crime and corruption
5. Outcome 5: Improved cooperation between the units in the beneficiary country and the donor country participating in the programme.

**The programme is implemented through pre-defined projects (PDP)**, targeting specific groups and contributing to the achievement of its goals and expected results. As a result of the implementation of projects within the programme, the achievement of the following specific results in the three programme areas (PO 16, PO 18 and PO 20) are pursued:

**Outcome 1 (PO 18): Increased capacity of national authorities in the area of asylum and migration**.

This programme area covers activities related to migrants crossing the country and in particular the creation of conditions for the accommodation of unaccompanied minors-foreigners, the attending to migrants who have been denied asylum and the training of MoI officials to comply with international migration rules, as well as connecting to international organizations engaged with international migration. The objectives in PO 18 are accomplished through the following pre-defined projects:

* PDP 1: Establishment of a centre for unaccompanied minors-foreigners;
* PDP 2: Increasing the administrative capacity of the competent authorities in the field of asylum and migration.

**Outcome 2 (PO 20): Increased capacity of law enforcement institutions in the area of crime investigation and prevention.**

This programme area covers the improvement of the capacity of the Ministry of Interior in terms of technical equipment and in terms of specific knowledge and competencies related to the rule of law, criminal investigation, communication with the police authorities internationally, as well as specific skills in countering and investigating crimes such as human trafficking, drug trafficking, smuggling of cigarettes and other excise goods. The PDPs in this area aim to compensate for some of the deficits in terms of personnel and technical equipment, identified under the Cooperation and Verification Mechanism (CVM), as well as to support the implementation of the National Security Strategy 2012-2020, adopted by the Bulgarian government. The specific pre-defined projects, through which the PO 20 objectives are achieved, are:

* PDP 3: Increasing the capacity of the Organised Crime General Directorate to achieve higher efficiency in the fight against organised and cross-border crime.
* PDP 4: Expansion of the communication infrastructure of the Ministry of Interior.
* PDP 6: Improving the capacity of the police and the judiciary related to material evidence in the pre-trial proceedings.
* PDP 5: Improving international police cooperation and prevention of international criminal activities.
* PDP 7: Development of expert forensic research and activities at the Criminology Research Institute at the Ministry of Interior (CRI) and technical upgrade and expansion of the capabilities of the five main regional forensic laboratories.
* PDP 8: Increasing the effectiveness of SANS (State Agency for National Security) in the fight against economic crime, including the prevention of money laundering, terrorist financing and predicate offences.

**Outcome 3 (PO 20): Improved situation of the Roma population.**

This group of projects is related to the commitment under the agreement with the NFM to invest 10% of the funds under each of the projects to improve the situation of the Roma. In the context of the *Home Affairs* programme, this includes training MoI staff to work in a multi-ethnic environment and to respect the rights of minority groups, to adequately deal with situations of domestic violence, gender-based violence, and to establish a productive dialogue with Roma communities, thus countering extremism, radicalisation, violence and hate speech. The projects under the programme also envisage raising the awareness of the Roma communities in the areas of migration and asylum. The pre-defined projects for the implementation of this group of activities of the *Home Affairs* programme are:

* PDP 9: Increasing the capacity of police officers working in a multi-ethnic environment, including in Roma communities and preventing the abuse of power by police officers.
* PDP 10: Improving the effectiveness of policing in the area of domestic violence and gender-based violence.
* PDP 11: Improving coordination and dialogue between the police and the Roma society.
* PDP 12: Raising awareness of local communities in places with a significant Roma population of asylum and migration issues.

**Outcome 4 (PO 16): Increased capacity of Bulgarian institutions to combat economic crime and corruption.**

The main goal of the pre-defined projects in this programme area is the implementation of successful and sustainable anti-corruption policies and measures to counter organised crime. The PDP and the specific activities derive from the recommendations to the Bulgarian government by the Council of Europe and the EU Cooperation and Verification Mechanism. The projects in PO 16 are:

* PDP 13: Prevention and countering corruption;
* PDP 14: Strengthening the capacity of authorities in Bulgaria with regard to the recovery and management of criminal assets.

**Outcome 5: Improved cooperation between the units in the beneficiary country and the donor country participating in the programme.**

The design of the *Home Affairs* Programme implies strengthened institutional relations between Bulgaria and Norway as a number of activities under the programme encourage the establishment of links, exchange of experience, transfer of knowledge and know-how and exchange of good practices between public institutions of the two countries. Partner organisations have participated in all phases of the programme design and this is due to the fact that many of the specific activities or areas of activity have established partnerships since the previous programming period (2009-2014). The main forms of participation and cooperation are the meetings of parties and the meetings of the Cooperation Committee held at the beginning of the programme.

**According to the PO, the programme is appropriate, adequate to the needs of the target groups, realistic and feasible. The main reason and prerequisite for this is the adequate planning of the projects and the intensive consultation process with stakeholders and the partner organisations from the donor country**.

In the course of negotiating the implementation with the beneficiaries, it has been established that it is not possible to achieve cooperation with the State Agency for Child Protection (SACP) and State Agency for National Security (SANS), which have been identified as potential beneficiaries under PDP 1 and PDP 8. The PO has taken corrective actions. As a result, proposals for changes in the programme have been submitted and no contracts were concluded with the specified institutions.

Despite the complex coordination procedures related to the projects, the programme is currently able to flexibly overcome the difficulties that arise and thus significantly reduce the risks of not achieving the objectives.

The design of the programme allows achieving sustainability of projects through flexibility and the ability to adapt activities to changing circumstances. The indicators in the programme agreement have been transferred to the project level. They are appropriate, clear, measurable, allow for monitoring the implementation of the objectives of the programme and account for the adequate reporting of the results achieved.

***1.3. Coordination / synergy of the programme***

The coordination and synergy of the *Home Affairs* programme with the measures implemented under other programmes is an important aspect of its evaluation. In this aspect, the programme is closely linked to the implementation of a number of national and international strategic and legal documents and to the coordination with the Justice programme. The compliance with national and international strategic and programme documents and legislation, as well as the coordination with other financial instruments and the existence of synergy with other programmes/interventions financed by the NFM are analysed. The main documents that are incorporated in the design of the *Home Affairs* programme are:

**Crime Prevention Strategy (2012-2020)**

The main goal of the strategy is to create a policy framework for building a comprehensive and sustainable regulatory and institutional framework for the successful implementation of government policy in the area of crime prevention. The fulfilment of the main objective of the Strategy will lead to:

* Reduction of crime and the costs of countering crime;
* Reducing the share of crimes with high frequency and public danger;
* Increasing the trust of citizens in institutions and encouraging their participation in the implementation of preventive policies;
* Stimulating socio-economic development by creating a secure and predictable business environment.

**Integrated strategy for prevention and counteraction of corruption and organised crime.**

The objective of the strategy is to increase the trust of Bulgarian citizens in the rule of law and statehood, and in European partners and foreign investors to Bulgaria through targeted, systematic, consistent, decisive and professional actions in all areas of governance for:

* prevention of corrupt practices at the high levels of government and local self-government and reduction of the opportunities for establishing links between organised crime, political parties and government bodies;
* achieving more tangible results in the fight against corrupt practices that harm citizens, hinder business and erode the statehood;
* maximum reduction of organised criminal activity, effective criminal prosecution and seizure of criminal assets;
* establishing Bulgaria as a reliable partner in the implementation of the policies for freedom, security and justice with a specific contribution to the protection of the financial interests of the European Union;
* overcoming the moral crisis in the country, building trust in values ​​such as integrity, morality and solidarity and establishing a sustainable value system in society, including intolerance to corruption and crime.

**Anti-Trafficking Act**

The law provides an opportunity to open specialized shelters for subsequent reintegration, as well as free legal aid and appropriate language assistance to victims of trafficking. In 2019 Amendments to the law have been adopted due to the need for effective implementation of the Council of Europe Convention on Action against Trafficking in Human Beings, which introduces minimum national standards and mechanisms for the treatment of victims of trafficking in human beings, as well as for support and protection. The changes guarantee a period for recovery and reflection, which is provided to victims of trafficking in human beings for initial recovery from trauma, for severing ties with traffickers, and for making a conscious and informed decision on whether to assist in prosecuting the perpetrator.

Other documents that underlie the development and implementation of the *Home affairs* programme are:

* Conventions and other standards of the Council of Europe and the European Union;
* Recommendations to Bulgaria in accordance with the Cooperation and Verification Mechanism (CVM);
* National Strategy of the Republic of Bulgaria for Roma Integration (2012 - 2020) and the related Action Plan, which adopts an integrated approach to reducing the vulnerability of the Roma in the field of education, employment, healthcare, culture, anti-discrimination;
* Framework Programme for Integration of the Roma in the Bulgarian Society (2010-2020), which is targeted at mobilizing the relevant institutions and civil society to counter discrimination, and reduce poverty, inequality, social exclusion of the Roma.

**Based on the assessment made in terms of the objectives, design and coordination of the *Home Affairs* programme, the following conclusions can be drawn:**

* The programme has been developed in accordance with the national and European strategic and programme documents in the field of law enforcement, taking into account the experience from the previous programming period;
* The priorities, projects and approach set in the programme correspond to the needs, problems and limitations of the main target groups of the programme and are presented in a process of consultation and coordination with stakeholders, incl. potential beneficiaries of the programme;
* Currently there is no new (beyond the already made) need to supplement or change the goals, projects and activities of the *Home Affairs* programme.

In general, the implemented systems for project management and control over the selection of project proposals, contracting, monitoring and reporting, financial control and payment, prevention systems, risk management systems, registration and reporting of irregularities, monitoring procedures, evaluation and reporting on the implementation of the programme can be assessed as sufficiently reliable, i.e., able to ensure the quality implementation of the PDPs.

**Both the design of the programme as a whole and the envisaged measures/interventions are assessed as optimal, i.e., they could not (other aspects being equal) be significantly improved.**

* + - 1. **Assessment of progress, delays and risks in the implementation of the programme**

In this section, the analysis focuses on the following key evaluation issues:

* What is the progress made (as of June 30, 2020) under the programme in terms of negotiation and implementation of measures, incl. the results achieved?
* Are there any deviations/delays from the initial programme implementation schedule? What is the reason for this and what is the potential impact of these delays on the successful implementation of interventions and the achievement of the set results?
* Is there a realistic up-to-date plan for the implementation of the measures under the programme?
* What problems have been identified in terms of: design/programming of interventions, selection of project proposals, contracting, monitoring and reporting, financial control and payments, prevention systems, risk management systems, registration and reporting of irregularities, the procedures for monitoring, evaluating and reporting on the execution of the programme, information and communication measures, etc.?

***2.1. Status of the programme and project implementation***

Most of the PDPs under the *Home Affairs* programme (12 out of 14) are already contracted and the implementation of projects is in the phase of developing documentation or initiating public procurement procedures. The exceptions are two projects (PDP 1 and PDP 8), for which contracts with the potential beneficiaries have not been signed due to the lack of possibilities to realize the set objectives and activities. The potential project promoters (SACP and SANS) have not declared their readiness to implement the projects. Accordingly, the PO has proposed a modification of the projects. Approval of the proposed changes and eventual signing of contracts is forthcoming.

**Outcome 1 (PO 18): Increased capacity of national authorities in the field of asylum and migration.**

The objectives of Result 1 are achieved by two PDPs (PDP 1 and PDP 2), the activities of which are described below. PDP 2 is in the **process of implementation** (concluded contract with the beneficiary and conducting public procurement). PDP 1 is in the process of modification, as the potential organizer of the project - SACP - has not expressed readiness for its implementation. The decision of the PO is to replace PDP 1 with an open procedure. This change has yet to be approved and then possible implementation will begin.

The objectives in PO 18 are accomplished through the following pre-defined projects:

**PDP 1: Establishment of a centre for unaccompanied minors-foreigners**. Due to difficulties related to the lack of support for the establishment of such a centre by the municipalities, the implementation of this project has not started. The PO has submitted proposals for change of the project and respective relocation of funds.

**PDP 2: Increasing the administrative capacity of authorities in the field of asylum and migration**. The project aims to strengthen the administrative capacity of the State Agency for Refugees (SAR) at the Council of Ministers (CoM) for effective implementation of its obligations and will contribute to ensuring the sustainability of acquired knowledge and improving specific skills related to the reception, accommodation, procedures for providing international protection and social and cultural adaptation, including an individual assessment of the needs of applicants for international protection, by improving the professional skills of SAR experts and gaining key and improved competencies.

**Outcome 2 (PO 20): Increased capacity of law enforcement institutions in the field of crime investigation and prevention**

The objectives of Outcome 2 are achieved by six PDPs (PDPs 3, 4, 5, 6, 7 and 8), the activities of which are described below. With the exception of PDP 8, all projects are in the **process of implementation** (concluded contract with a beneficiary and public procurement).

In a relatively advanced phase of implementation is PDP 4, where the implementation is in the execution phase of the main activity of the project - expansion of the TETRA communication system. The main reason for this is the fact that the network has been constructed to a certain extent and, in this sense, the project builds on previous communication investments.

With regard to PDP 8, the decision of the PO is to proceed with its modification, replacing the planned beneficiary of the project (SANS) with the Border Police, the activities have been modified and aimed at strengthening cooperation in the field of the Schengen area.

The specific activities envisaged under the PDPs in relation to Outcome 2 are:

**PDP 3: Increasing the capacity of the General Directorate of Countering Organised Crime (GDCOC) to achieve higher efficiency in the fight against organised and cross-border crime**. The project aims to increase national capabilities to fight transnational and organised crime and will improve co-operation with the National Crime Investigation Service (KRIPOS) of the Norwegian National Police Directorate and international organisations such as Interpol, Europol and other foreign law enforcement organisations. The project will strengthen the justice chain, as well as the knowledge and capacity of the staff of the GDCOC - Ministry of Interior, magistrates and other persons involved in the fight against organised crime. The conditions for preservation and proper storage of evidence will be further improved. Experts from organisations such as Europol, Eurojust and Interpol will also be invited to participate in the seminars to share their experience and knowledge.

**PDP 4: Expansion of the communication infrastructure of the Ministry of Interior**. The project aims to improve coordination between law enforcement agencies by strengthening the TETRA communication system in the area of ​​the Bulgarian-Greek border, which is used as a channel for illegal migration, drug and human trafficking, as well as sex tourism and slavery. The project will contribute to improving the ability of Bulgarian law enforcement agencies to exchange information and ensure secure communication with relevant Greek institutions. The project will address the needs for better radio coverage along the Bulgarian-Greek border and in particular in the Blagoevgrad district (the towns of Bansko and Gotse Delchev) and the Smolyan district (Dospat).

**PDP 5: Improving international police cooperation and prevention of international criminal activities**. The project aims to improve the capacity for international police cooperation and the training of law enforcement officers through specialised training on working with existing information systems and databases, methods and channels for information exchange and international police cooperation. The specialised trainings will be related to the forthcoming integration of AFIS and facial recognition in the SIS, the inclusion of alerts under the new Article 40 "Unidentified suspect/offender" and the development of objective categories of alerts under Art. 38, start of the implementation of the measures in the signals under art. 24 "entry ban" by the Bulgarian authorities and the new elements of the SIS, as well as the system for "more stable and intelligent" borders - the European Travel Information and Authorisation System (ETIAS). Technical equipment will be provided to support the capacity development of law enforcement officials working in the field of international operational cooperation.

**PDP 6: Improving the capacity of the police and the judiciary related to physical evidence in the pre-trial proceedings**. The project aims to improve crime scene investigations, incl. improving the crime scene inspection for the detection and collection of evidence and improving the system for storing evidence. The implementation of the pre-defined project should ensure the collection of high-quality evidence for laboratory analysis.

Improving the quality of pre-trial investigations is achieved by providing a more in-depth view of the crime scene in accordance with international norms and instruments, namely Prüm Decisions 2008/615/JHA and 2008/616/JHA, Council Framework Decision 2009/905/JHA, the Council Conclusions approved in December 2011 on the establishment of the European Judicial Area by 2020, the Council Conclusions of 16 June 2015 on the renewed Internal Security Strategy of the European Union and the European Security Strategy, Council Conclusions and Action Plan for the forthcoming steps to establish a European Judicial Area, adopted by the Council on 9 June 2016. In 2017, the Concept for Sustainable Development of Forensic Science (Expert Judicial Activity) was adopted in the Ministry of Interior.

The General Directorate of the National Police (GDNP) needs to increase its competence and capabilities in order to bring its practices in line with the obligations and recommendations of the above-mentioned documents. As a body with competences in the conventional investigation of crimes, regulated in the relevant legal norms, GDNP will be responsible for the implementation of the project.

**PDP 7: Development of expert forensic research and activities at the Criminology Research Institute at the Ministry of Interior** a**nd technical upgrade and expansion of the capabilities of the five main regional forensic laboratories**. The project aims to increase the forensic capacity of Bulgaria so that it could perform a precise and comprehensive assessment of the evidence collected in criminal and civil cases. The aim of the project is to improve the forensic infrastructure in Bulgaria, which is a requirement for all European countries in connection with the common goal set in the strategy "European forensic science 2020". The project also aims to increase the capacity for forensic investigations of drug and intoxicating substances, for the examination of latent (hidden) fingerprints, identity documents, biometric traces and digital evidence. It also aims to increase the capacity to authenticate the identity of illegal residents and arrest illegal immigrants; to increase the capacity and quality of the evidence collected and examined in relation to computer and cybercrime and to create specialised working places for the analysis of information carriers, network and communication devices.

**PDP 8: Increasing the effectiveness of SANS in the fight against economic crime, including the prevention of money laundering, terrorist financing and predicate offenses**. Due to the impossibility for SANS to be involved in the implementation of the project, the PO has not signed a contract for the implementation. Information has been submitted for changes in the content and objectives of the project, which must be approved by the FMO and the NFP.

**Outcome 3 (PO 20): Improved situation of the Roma population**

The objectives of Outcome 3 are achieved by four PDPs (PDPs 9, 10, 11, and 12), the activities of which are described below. All projects **are in the process of implementation** - signed contract with a beneficiary and conducting public procurement in connection with the activities provided for in the projects.

The specific activities envisaged under the PDPs in relation to Outcome 3 are:

**PDP 9: Increasing the capacity of police officers working in a multi-ethnic environment, including in Roma communities and preventing the abuse of power by police officers**. The project will contribute to preventing human rights violations by the police when working in a multi-ethnic environment, with a special focus on the Roma population; increasing the skills of police officers to prevent domestic violence, human trafficking and pickpocketing in Roma communities and the abuse of power by police officers.

In accordance with the *Home Affairs* Programme, PDP 9 will contribute to the implementation of the specific requirement of the Memorandum of Understanding that at least 10% of the total eligible costs of the programme be aimed at improving the condition of the Roma population.

**PDP 10: Improving the effectiveness of policing to prevent domestic violence and gender-based violence.** The project aims to improve the capacity of the Bulgarian police to respond to cases of domestic violence and gender-based violence (DGBV). The project will also contribute to the development of effective policies in the field of countering human rights violations. The project will improve the situation of the Roma population. It will be implemented in areas with a high concentration of Roma population and will focus on prevention, risk assessment, victim support and data collection on domestic violence and gender-based violence in Roma communities.

**PDP 11: Improving coordination and dialogue between the police and Roma communities**. The project aims to improve the situation of the Roma population which will lead to improved coordination and dialogue between the police and Roma communities. The project will also contribute to the prevention of radicalisation, violent extremism and hate speech and help create informal networks at the national and regional level for the exchange of ideas, knowledge and good practices on these topics. The project will support the cooperative initiatives of all public institutions working in Roma communities (police, child protection services, education). Measures are envisaged to improve the coordination between the regional directorates of the Ministry of Interior and the local Roma organisations, to create better conditions for multi-ethnic dialogue and a better understanding of the Roma cultural values. The project proposal also provides training for police officers to increase their skills and competence to identify the early signs of radicalism in its various forms.

**PDP 12: Raising awareness of local communities in areas with a significant Roma population of asylum and migration issues**. The project will contribute to raising and improving the awareness and knowledge of the Roma population in the field of legislation on asylum and migration, as well as the risk of abuse and exploitation in Bulgaria, the European Union and the European Economic Area.

**Outcome 4 (PO 16): Increased capacity of Bulgarian institutions to counter economic crime and corruption.**

The main goal of the pre-defined projects in this programme area is the implementation of successful and sustainable anti-corruption policies and measures and counteracting organised crime. The PDP and the specific activities derive from the recommendations to the Bulgarian government by the Council of Europe and the EU Cooperation and Verification Mechanism.

The objectives of Outcome 4 are achieved by two PDPs (PDPs 13 and 14), the activities of which are described below. All projects **are in the process of implementation** - a signed contract with a beneficiary and public procurement in connection with the activities provided for in the projects.

The specific activities envisaged under the PDPs in relation to Outcome 4 are:

**PDP 13: Prevention and counteracting corruption**. The project aims to increase the administrative capacity to prevent and counter corruption among police officers. The whistle blower mechanism will improve the integrity of police officers. The technical capacity for prevention of corruption in other state institutions will be increased.

**PDP 14: Strengthening the capacity of authorities in Bulgaria with regard to the recovery and management of criminal assets**. The project aims to increase the security of citizens by continuing to upgrade the efficiency and effectiveness of the system for recovery of assets from criminal activity in Bulgaria. The project will strengthen the systems for fighting corruption, tracking, detecting and seizing assets from crime, which is a crucial step towards fulfilling Bulgaria's objectives in preventing and counteracting organised crime and corruption, restoring the rights and compensating victims of crime. The project will increase the capacity of the Commission for Countering Corruption and Seizure of Illegally Acquired Assets (CCCSIAA) and the CCCSIAA staff to conduct anti-corruption investigations and to track criminal assets, especially in cross-border cases, and will contribute to the development of CCCSIAA contacts with international networks of partner organisations in order to carry out seizures abroad and to participate in joint investigation teams. The project will allow the CCCSIAA to carry out effective bilateral cooperation with foreign authorities by seizing assets on behalf of partner organisations. The project will also improve the knowledge and skills of CCCSIAA staff in key areas of legal aspects and will improve the Commission's information infrastructure.

**Outcome 5: Improved cooperation between the organisations in the beneficiary country and the donor country participating in the programme.**

The main partner on the Norwegian side is the Ministry of Justice and Public Security (Norway), which carries out the donor coordination under the Justice and *Home affairs* programmes, thus helping to establish the necessary synergies between the projects in the two programmes, as well as to establish links between PDPs and Norwegian partners in the relevant field.

The main partner in the field of migration and asylum is the Norwegian Directorate of Migration (UDI), which supports its Bulgarian partners by transferring experience gained in previous years in Greece. At the level of projects, the partners of the *Home affairs* programme from the Norwegian side are: Norwegian Refugee Council, Norwegian Asylum Seekers Organization, National Crime Investigation Service (KRIPOS) of the Norwegian National Police Directorate, Oslo District Police, National Police Service on Immigration (NPIS), Organization for Security and Co-operation in Europe (OSCE) / Office for Democratic Institutions and Human Rights (ODIHR).

***2.2. Changes, deviations and delays in the implementation of the programme***

The main changes and delays under the *Home affairs* programme are related to the implementation of PDP 1 and PDP 8. The PO has proposed appropriate modifications of these projects, which are awaiting approval so that their implementation could start. It is currently difficult to assess whether, in their modified form, these projects will continue to be part of the programme.

In general, the conclusions in this aspect of the evaluation can be summarised as follows:

First, excluding PDP 1 and PDP 8, it is clear that the precise advance planning and design of the PDP under the *Home Affairs* programme has led to a practical absence of delays and deviations in the implementation of the programme. The changes required for PDP 1 and PDP 8 can also be explained by the insufficient institutional capacity of the beneficiaries and/or impossibility to implement the specific projects. With regard to the remaining 12 PDPs, the implementation of the activities is timely, and no risks of non-implementation have been identified.

Second, so far, no problems have been identified vis-à-vis the implementation of project-related public procurement. The latter, especially if they involve appeals and/or an unrealistic assessment of the resources needed to implement them, often lead to critical risks.

Third, the experience gained in the previous period (2014-2020) and the fact that many of the PDPs are a continuation of already tested activities and practices, has contributed to the relatively smooth start of the implementation of most PDPs in the new programming period.

Fourth, the current pandemic situation does not pose any notable difficulties in the implementation of the projects: the implementation phase, where most of the PDPs currently are, the problems that could be created by the pandemic situation can be compensated. It is likely, if there is no change in the pandemic situation, that at the phase of concrete implementation of the activities, problematic situations could arise in the PDPs, especially in cases which include training and communication of larger groups of people.

***2.3 Identified problems in programme management***

The PO team has significant experience and is well trained to deal with operational problems, taking into account the experience gained in the previous programming period. The management of the programme is well provided with personnel and resources. **No significant problems were identified with the management of the programme.**

As of August 30, 2019, the programme has uploaded its projects in the new information system, and no difficulties of employees to work with the system have been identified.

The work and cooperation with foreign and national partners of the programme is assessed as very good. Coordination meetings and information days are held periodically, which ensures a sufficiently good level of coordination with beneficiaries and donor organisations.

* + - 1. **Evaluation of the effectiveness and efficiency of the programme**

In this section, the implementation of the programme is analysed in accordance with the following key evaluation criteria:

* Is the support provided under the programme focused on the most effective and efficient interventions in terms of the objectives of the financial mechanisms, as well as the needs and priorities of Bulgaria in the programming period?
* To what extent have the results, indicators and objectives at the programme level been achieved or are expected to be achieved? Is there a risk of not achieving the set results and planned values ​​of the indicators and what factors (internal or external to the programme) contribute to this risk?
* Are the necessary resources (financial, time, administrative capacity, procedures, etc.) available to ensure the effective and efficient achievement of the set results, indicators and objectives?
* Has the programme operator identified a risk of delay in the implementation of time-dependent measures and interventions and how is this risk addressed?

***3.1 Evaluation of effectiveness***

**Most projects under the *Home Affairs* Programme are in the initial phase of implementation. The concrete results could be assessed only when the preliminary stage of implementation is completed - initial structuring and announcement of public procurements, i.e., the phase in which most of the PDPs currently are.**

The indicators for evaluation of the results, which have been set in the programming stage, are quantitatively measurable. They are assessed as adequate and reliable - there are no proposals for their change. However, it is still too early to assess the level of implementation on most indicators.

The implementation of the programme and the progress made are monitored by the PO. Regular online meetings with the project teams are held and the implementation of the projects, the achieved results and the achievement of the target values ​​of the indicators are monitored.

**The planned interventions at this stage can be assessed as appropriate, effective and realistic. They match the needs and priorities of Bulgaria in the programming period and largely correspond to the problems and needs of the target groups of the programme**.

***3.2. Evaluation of the financial resources and efficiency of the programme***

According to the assessment of the PO, the funds provided under the NFM for the implementation of the planned activities are sufficient for the implementation of the set goals and implementation of the activities under the planned PDPs. At present, the envisaged financial resources and their allocation meet the needs of the target groups. Most likely, they adequately reflect the available capacity for absorption of funds in programme areas 16, 18 and 20.

The *Home Affairs* Programme envisages a total of about 10% of the total eligible costs of the programme to be targeted at improving the situation of the Roma population. For the related PDPs under the programme, it will probably be difficult to assess how much of the funds have been used for the needs of vulnerable groups, especially the Roma population.

**In general, the amount of financial assistance provided under the NFM under the *Home affairs* programme can be assessed as significant and consistent with the programme objectives and the needs of the target groups. Implementation of the objectives and the PDPs under the programme will contribute to a significant improvement of the material conditions and qualification of the staff and will also contribute to the introduction of new practices in the activities of the Ministry of Interior in terms of crime prevention, crime investigation, violence prevention and extremism**.

***3.3. Risks for the implementation of the programme***

**In the Strategic Report for the period 01.08.2019 - 31.07.2020, the NFP identifies several forthcoming changes in the implementation of the programme related to the transformation - selection of a different profile of the activities of PDP 1 and PDP 8.**

PDP 1 is planned to be transformed into an open procedure which would increase the range of possible activities in the field of migration and refugees in order to overcome the risk for implementation due to the lack of suitable places for the construction of a Centre for Unaccompanied Minors-Foreigners and resistance from local communities. PDP 8 is planned to be transformed for Schengen cooperation activities, which may lead to delays in project implementation. The Strategic Report for the period 01.08.2019 - 31.07.2020 states that the implementation of these projects is a risk for the *Home Affairs* Programme, but this risk is still manageable. This report also notes the insufficient capacity of some of the PDP contractors to effectively manage the public procurement process. This is identified as a moderate risk of delaying project implementation. Corrective action in this regard is the applied enhanced monitoring and control of the process by the NFP and the PO.

Other risks identified in the Strategic Report are:

* Insufficient administrative capacity, which could hinder the implementation of PDPs 2, 6, 7, 10, 11, 12 and 13;
* Existence of delays in the implementation of the public procurement programme;
* Delays and postponements of visits related to bilateral cooperation with donor organisations.
1. **Roma focus of the programme**

This section presents the results of the analysis of several key evaluation issues related to the objective of improved Roma inclusion:

* To what extent are the objectives for ensuring Roma focus under the *Home Affairs* programme being met?
* Is compliance with the national policies for Roma integration ensured (National Strategy of the Republic of Bulgaria for Roma Integration 2012 - 2020; National Action Plan for the period 2015-2020 for implementation of the National Strategy of the Republic of Bulgaria for Roma integration Roma 2012-2020)?
* Does the consultation process meet the needs of financial support schemes and the Roma as a target group?
* To what extent is there complementarity and synergy with other projects and programmes, as well as upgrading results related to the Roma focus on the EEA FM from the previous programming period (2009 - 2014).
* In the implementation of integrated measures for local development and poverty reduction through education, employment and health care, including initiatives aimed at the inclusion and integration of vulnerable groups.
* How the experience of identical procedures at the national level and foreign practices has been utilised.
* What type of monitoring is envisaged: reporting on the participation of a number of Roma in the implementation of activities or the number of products representing Roma culture and how this participation has contributed to a real change in the impact of the projects and the programme?

***4.1 Fulfilment of the objectives for providing Roma focus on the programme***

This priority is clearly outlined in the Memorandum of Understanding and the Programme Agreement for the current NFM programming period. The *Home Affairs* Programme of the NFM has a clear Roma focus, which can be linked to several PDPs:

* PDP 9: Increasing the capacity of police officers working in a multi-ethnic environment, including in Roma communities and preventing the abuse of power by police officers;
* PDP 10: Improving the effectiveness of policing in the field of domestic violence and gender-based violence;
* PDP 11: Improving coordination and dialogue between the police and the Roma communities;
* PDP 12: Raising awareness of local communities in areas with a significant Roma population of asylum and migration issues.

These PDPs have a clear Roma focus, address target groups, among which a large part of the final beneficiaries belong to the Roma community. Some of them address the capacity building of police officers (PDP 9 and PDP 10), while others (PDP 11 and PDP 12) involve direct interaction between police officers and the Roma community.

The pre-existing concept in the construction of the PDPs is that, in principle, many of the activities address the needs of all vulnerable groups both in terms of contacts with law enforcement and in terms of the residence of representatives of these groups in the institutions of the penitentiary system. With regard to the latter, according to the PO, it is difficult for interventions to be specifically targeted at a specific group, but rather aim at a non-discriminatory treatment of all groups with the ultimate goal of improving the conditions and situation of vulnerable and minority groups in the areas of crime prevention, domestic violence and gender-based violence, as well as possibilities for radicalisation, extremism, violence and hate speech.

During the interviews with the PO, experience was shared from previous programming periods, that the direct participation of Roma organisations and/or their representatives is a prerequisite for the activities of such projects to be successful. The assurance of the PO is that such an opportunity will be used both in cases planned to address the problems of the Roma community, and through the direct participation of Roma organisations as beneficiaries and implementers of projects.

As for the direct participation of the Roma community (including Roma organisations and NGOs) in the consultation process on the structuring of projects under the programme, this opportunity has been used to a limited extent. Rather, it relies on the active participation of Roma organisations in the project implementation process, as well as the availability of projects that are directly targeted at resolving the problems of the Roma community.

**The proposed initiatives and measures under the *Home Affairs* Programme are generally in line with the National Strategy of the Republic of Bulgaria for Roma Integration 2012-2020 (NSRBIR), with the National Action Plan for the period 2015-2020 for implementation of the NSRBIR and with the Framework Programme for Integration of the Roma in the Bulgarian Society (2010-2020).**

***4.2. Risks of not achieving the goal of Roma inclusion and empowerment***

The main problems that are relevant for the Roma population and are addressed by the *Home affairs* programme are the following:

* Increased (compared to the national average) involvement of persons from the Roma community in criminal activities. This creates more frequent contacts with law enforcement institutions and risks associated with poor access to police officers by members of this community. Failure to implement some of the activities of the programme, which aim at improving the interaction between police officers and the Roma community, risks leaving the current situation of the Roma unchanged.
* The problems of juvenile delinquency, domestic violence and gender-based violence are more acute among people in the Roma community than among other groups. In this sense, the PDPs under the *Home Affairs* programme would have a significant contribution to improving the situation in the listed areas. Accordingly, non-fulfilment of the objectives and PDPs under the programme would lead to missing significant opportunities.

**One of the main problems from the point of view of the Roma focus at this stage of the programme development, is that there is no clear mechanism for engaging representatives of the Roma community to participate both in the programming and in the implementation of the projects under the programme**.

The Roma community and the Roma organisations, at least at this stage of the implementation of the programme, are rather potential beneficiaries of the programme and possible executors of some of the projects.

## 3.6 Analysis and evaluation of the implementation of the *Justice* Programme

The analysis and evaluation of the implementation of the *Justice* Programme are consistent with the overall objective of carrying out an interim evaluation of the implementation of the programmes financed under the EEA FM and the NFM 2014-2021.

**The specific** objectives of the evaluation of the *Justice* Programme are:

* To assess the progress in the implementation of the programme on the basis of the analysis and evaluation of its objectives, results and outcomes, which are expected to be achieved from the implementation of the funded interventions/projects.
* To assess the appropriateness, effectiveness and efficiency of the implementation of the *Justice* Programme, taking into account its specific target groups and specific objectives.
* To assess the results achieved under the *Justice* Programme interventions and the likelihood of achieving or risking failure to achieve the planned results under the individual programmes.
* To assess identified problems and good practices (strengths and weaknesses) of the implementation of the Justice programme, and to formulate recommendations aimed at addressing the identified problems that can serve in the process of making sound management decisions.

The evaluation is based on the progress in the implementation of the *Justice* programme for the period from the signing of the Programme Agreement between the National Focal Point (NFP) and the EEA FM Office by 30 June 2020, assessing the possibility of achieving the objectives and results set within the deadline for the implementation of the projects (PDPs) – 30.04.2024.

1. **Objectives, design, and coordination of the programme**

This section addresses the following key issues of the evaluation of the implementation of the *Justice* Programme:

* To what extent do the priorities, the interventions selected, and the approaches applied (eligible actions, costs, beneficiaries, etc.) match the needs, problems and constraints of the target groups of the programme?
* To what extent do programme interventions complement the support provided under other programmes and financial instruments (in particular ESIF funding and other EU-funded programmes)?
* What are the links and synergies between the programme and the measures implemented under other programmes with a view to achieving national and pan-European objectives of economic development and social cohesion?
	1. ***Objectives of the programme and compliance with the needs of the target groups***

The *Justice* Programme covers two programme areas (PA19 and PA21) and aims at improving the quality and effectiveness of the justice process related to respect **for human dignity, freedom, equality, the rule of law and respect for human rights, as well as respect for the rights of minority groups**. In the area of the penitentiary system, the programme aims to contribute to modernising and reforming the penitentiary system in accordance with European standards, humanising the implementation of different types of sanctions in order to achieve their objectives, improving the rehabilitation of offenders, increasing the level of competence and motivation of staff, cooperation and opportunities to innovate the functioning of the Directorate-General for Enforcement of Penalties and its territorial units.

In relation to minority groups, the *Justice* Programme foresees that around 10% of the resources spent will be directed towards improving the situation of the Roma population in the country, directly or indirectly focusing on the judicial aspects of the functioning of the Roma community.

The programme interventions include a set of measures that can be divided into two groups. Hard measures, which cover the improvement of the material base of the justice system - improving the conditions in pre-arrests, detention and interrogation of children, the material base of the penitentiary system, etc. Soft measures, related to the training of judiciary staff at all levels (from magistrates to staff in the penitentiary system) as well as measures ensuring adequate legal assistance and access to justice for the population of the country, in particular access to justice of vulnerable and minority groups.

The development of the programme also accounts for the experience of the implementation of the programmes and projects supported by the EEA FM and the NFM in the period 2009-2014.

In connection with the evaluation of the objectives and priorities of the programme, information has been collected on several main topics:

1. Matching the objectives and priorities of the programme with the problems and needs of the target groups;
2. Adequacy and feasibility of the objectives, the approach and the activities of the programme;
3. Proposals to modify/complement the objectives and activities of the programme.

**The objectives of the programme can be evaluated as adequate to the needs and problems of the target groups, and the justice and penitentiary system in the country.** The two main areas of objectives of the programme for improving the material and staff conditions of the penitentiary system and improving access to justice and the quality of legal assistance to vulnerable groups, have been developed in consultation with the programme's stakeholders and international partners. A significant proportion of available resources (around 70%) are aimed at improving the material base of the penitentiary system and the judiciary system, and for this purpose prisons and pre-arrests will be reconstructed in a number of areas of the country in order to ensure compliance with international and Council of Europe rules. Combinations between hard and soft measures are planned in the field of improving the qualification and training of staff of the judiciary, including the establishment of a training centre of the penitentiary system with a modern pilot prison, development and approbation of training curricula, implementation of systems for access to information, etc.

The aim of the programme, in addition to the outcomes in the judiciary and penitentiary system, is to establish mutual trust, a spirit of cooperation and cooperative relations and partnership between the respective institutions in Bulgaria and Norway. Two meetings were held within the Programme Cooperation Committee in 2019 – in April in Sofia and in October in Liliestroem (Norway).

The programme is implemented in close cooperation with the foreign partners – the Ministry of Justice, Norway, the Norwegian Directorate of Public Security and the Norwegian Correctional Service (KDI). In addition, the Norwegian Judicial Administration and the Council of Europe are actively involved in the consultation process. A number of aspects of the programme and the PDPs have been discussed within the NFM Cooperation Network, which includes partner countries from 6 countries supported by the NFM. Several strategic meetings have taken place under this cooperation network in the PA 19 area in 2019 (in Romania, the UK and Norway) and in 2020 in Strasbourg.

* 1. ***Projects and expected outcomes***

Stakeholder consultations identify four main areas of the programme that finance projects to achieve the following outcomes:

1. Improving the capacity of judiciary staff and the penitentiary system;
2. Improving the application of the European legal framework in the Bulgarian justice system;
3. Improved capacity of Bulgarian institutions in the field of child justice;
4. Improved capacity of Bulgarian institutions in the field of domestic and gender-based violence;
5. Bilateral outcome: improving cooperation between donor and beneficiary institutions.

**The programme is implemented through calls for proposals and one small grant scheme (PA 21) targeting specific groups** and contributing to the objectives and expected results of the programme.

**Outcome 1: Improving the capacity of the judiciary staff**

Includes improvement of the material base of detention facilities and training of penitentiary system personnel. Significant investments are envisaged for the construction of a training centre with an adjacent pilot prison, which will serve as a model for the future reconstruction of the system of detention facilities in the country.

* PDP 1: Ensuring a safe and secure environment in prisons and arrests;
* PDP 2: Increasing staff capacity and building a pilot prison, linked to a training centre and improving the rehabilitation of prisoners;
* PDP 3: Strengthening the implementation of alternative measures to imprisonment.

**Outcome 2: Improving the application of the European legal framework in the Bulgarian justice system**

* PDP 5: Enhancing national capacity to effectively implement the rulings of the European Court of Human Rights;
* PDP 6: A modern learning environment for judges, prosecutors, investigators and other representatives of the professional community;
* PDP 8: Enhancing professionalism in the judiciary.

**Outcome 3: Improved capacity of Bulgarian institutions in the field of child justice**

* PDP 4: Improving police capacity and establishing favourable conditions and procedures for children who have contact with the justice system and children in need of protection;
* Small grant scheme: Improving the capacity of Bulgarian institutions in the area of establishing favourable conditions and procedures for children who have contact with the justice system.

**Outcome 4: Improved capacity of Bulgarian institutions in the field of domestic and gender-based violence**

* PDP 7: Preventing and counteracting violence against women and domestic violence;
* PDP 9: Improving access to justice for people living below the poverty line with a special focus on women, children and the Roma community;
* Small grant scheme: Improving the capacity of Bulgarian institutions in the field of violence against women and domestic violence.

**Bilateral outcome: improving cooperation between donor and beneficiary institutions**

The aim of the programme, in addition to outcomes in the judiciary and penitentiary systems, is to establish mutual trust, a spirit of cooperation and cooperative relations and partnership between the respective institutions in Bulgaria and Norway.

Overall, the objectives of the programme, the outcomes envisaged, as well as the PDPs and small grant schemes are in line with the needs of the main target groups of the programme. In particular, the following target groups are focused on by programme areas:

**Programme Area 19**

* Prisoners sentenced to probation and detainees - the objective of the programme is to ensure humane conditions of residence and compliance of detention facilities with international standards. The same applies to the conditions for the rehabilitation of prisoners, their resocialization and preparation for reintegration into society;
* Vulnerable groups of prisoners such as women, juvenile offenders, prisoners with special needs, persons from minority groups, including the Roma;
* Medical and non-medical staff in prisons;
* Convicted, on probation or released on bail;
* Children and families of prisoners serving their sentences.

**Programme Area 21**

* Vulnerable groups, including children and the Roma;
* Victims of domestic and gender-based violence;
* Minors;
* Magistrates, administration of the judiciary, legal specialists, experts at the Ministry; of Justice, inspectors and experts of the Inspectorate of the Supreme Judicial Council (SJC), police officers;
* Law students.

**According to the PO, the programme is appropriate, adequate to the needs of the target groups, realistic and feasible.** To date, major difficulties and a relative delay in the implementation of the programme are encountered in the implementation of the hard measures, which include the reconstruction of the material base of prisons and detention facilities. This also includes the "blue rooms", which facilitate the implementation of the principles of child justice and ensure adequate conditions for protection and interrogation. Despite the complex coordination procedures related to these projects, the programme is currently able to flexibly overcome emerging difficulties and therefore significantly reduce the risks of failure to achieve the objectives. The design of the programme allows for the sustainability of projects and ensures flexibility and the possibility of adaptation and updates. The indicators in the programme agreement are correctly transferred to the project level. They are appropriate, clear, measurable, enabling the implementation of the objectives of the whole programme and adequate reporting of the results achieved.

***1.3 Coordination/synergy of the programme***

The coordination and synergy of the *Justice* Programme with the measures implemented under other programmes is an important aspect of its evaluation. In this respect, the programme is closely linked to the implementation of a number of national and international strategic and legal documents and to coordination with the *Home Affairs* Programme. Compliance with national and international strategic and programming documents and legislation, as well as coordination with other financial instruments and the availability of synergy with other programmes/interventions financed by the EEA FM and the NFM and others, have been analysed.

The programme corresponds and is developed in accordance with key national strategic and legal documents. The two main national documents are:

* **Strategy for the development of the penitentiary system in Bulgaria 2020-2025 (**Decision No 799 of the Council of Ministers of 27.12.2019). The main objective of the Strategy includes humanising the implementation of different sanctions in order to achieve their objectives, improving the rehabilitation of offenders, increasing the level of competence and motivation of the staff, cooperation and opportunities to innovate the functioning of the Directorate-General for Enforcement of Penalties and its territorial units.
* **Updated roadmap for the implementation of the Updated Strategy for continuing the reform of the judiciary (May 2019).** The roadmap is an update of the document adopted by the Council of Ministers in 2010 and aims to continue the judicial reform in the context of the membership of the country in the European Union. The strategy was adopted by Decision No 825 of the Council of Ministers of 18 December 2014, submitted for adoption by the National Assembly.
* The roadmap for the implementation of the Updated Strategy for the Continuation of the Reform of the Judiciary was adopted by the Council of Ministers Decision No 299 of 22 April 2016. The updated roadmap for the implementation of the Updated Strategy for the Continuation of the Reform of the Judiciary was adopted by the Council of Ministers Decision No 268 of 9 May 2019.
* In its January 2014 report the Cooperation and Evaluation Mechanism and the European Commission also recommended updating the Strategy. The Strategy has incorporated a number of key documents and recommendations: the opinions of the Venice Commission, the Strategy for the introduction of e-Government and e-Justice in the Justice Sector 2014 -2020, the Concept of State Policy in the Field of Justice for the Child, the Strategy for development of the National Legal Aid Bureau 2014-2019, Guidelines for the activities of the National Institute of Justice (2014-2020), etc. The updated Strategy has a 7-year horizon for implementing reforms and is synchronised with the support programming period of EU Structural Funds.

**On the basis of the assessment of the objectives, design and coordination of the *Justice* Programme, the following conclusions could be made:**

* The programme has been developed in accordance with national and European strategic and justice programming documents, taking into account the experience of the previous programming period.
* The priorities, projects and approaches set out in the programme correspond to the needs, problems and limitations of the main target groups of the programme and have been developed in a process of consultation with stakeholders, including potential beneficiaries of the programme.
* There is currently no need to complement or change the objectives and activities of the programme.
* Related to PDP 4, it is necessary to improve the links between the Justice programmes as a PO and the General Directorate of the National Police as a beneficiary. The project envisages the approbation of a local mechanism for cooperation between all stakeholders, incl. the Ministry of the Interior in the fight against domestic violence and gender-based violence and the preparation of a report to be considered at the expert level and submitted for implementation at the national level. The results of PDP 4 complement the results of the small grants scheme (SGS). The link between the Justice programme and the *Home Affairs* programme is based on coordination and cooperation within the programme management, such as participation of representatives of the programme management teams in the Cooperation Committees, as well as coordination in the implementation of the project.
1. **Assessment of progress, delays, and risks in the implementation of the programme**

In this section, the analysis focuses on the following key evaluation issues:

* What progress has been made (as of 30 June 2020) under the programme in terms of negotiating and implementing the measures, including the results achieved?
* Are there deviations/delays from the initial schedule for the implementation of the programme? What are the delays and what is their potential impact on the successful implementation/finalisation of interventions and the achievement of the set results?
* Is there a realistic up-to-date implementation plan for the programme measures?
* What problems have been identified in terms of: the design/programming of interventions, the selection of project proposals, the negotiation, monitoring and reporting, financial control and payment, prevention systems, risk management systems, registration and reporting of irregularities, monitoring procedures, evaluation and reporting of programme implementation, information and communication measures, etc.?

***2.1  Programme implementation status***

 At the beginning of 2020, contracts have been signed for most PDPs and they are in a period of initial implementation. In particular, the implementation of the programme by district and by PDPs can be summarized as follows:

**Outcome 1: Improved capacity of the judiciary**

Includes improvement of the material base of the places for detention and training of the staff of the penitentiary system.

**PDP 1: Ensuring a safe and secure environment in prisons and detention centres.** The project is being implemented by the General Directorate for the Execution of Punishments is in its initial phase of implementation, as the beneficiary is in the process of announcing public procurement. The implementation envisages that prisoners and detainees be placed in better conditions, and that employees in places of detention be provided with better and safer working conditions. Creating a healthier environment for people, serving penalties is a key prerequisite for ensuring individualization in the sentence. The implementation of the project will also create conditions for the implementation of a wider range of activities, services and awareness in the places for detention facilities, with an emphasis on vulnerable groups, including the Roma.

By the middle of 2020, all public procurements have been announced in connection with this project, and for one of them (Pazardzhik) a contract has been signed; it in the process of implementation, but there has been a technical interruption due to COVID-19 and subsequently work has been restarted. Another 5 public procurements have been terminated, but 4 of them have been announced again in early 2021.

**PDP 2: Increasing staff capacity, building a pilot prison linked to a training centre and improving the rehabilitation of prisoners.** The project is implemented by the General Directorate for the Execution of Sentences. The public procurement announced under the project was terminated due to a change in the technical parameters of the forthcoming facility in the village of Samoranovo, Dupnitsa municipality, which envisages the construction of a training centre and a pilot prison. Currently a new evaluation of the technical specifications is under way and a new procurement announcement will be initiated. According to the PO, the accumulated delays may be overcome by the deadline for implementation of the PDP - 2024. The overall goal of the project is to contribute to the sustainable implementation of an approach based on knowledge, human rights and the rule of law in the Bulgarian penitentiary system. The specific objectives of the project are:

* Improving the correctional system by building a "pilot prison" connected to a staff training centre;
* Modernization of the concept of staff training and establishing a knowledge-based organization;
* Improving the rehabilitation of prisoners and strengthening their social competencies to reduce recidivism, with a focus on vulnerable groups;
* Strengthening the interaction and cooperation with stakeholders and the civil society.

The public procurement announced for the design of the training centre has been completed and an investment design contract is to be signed in 2021. According to the PO, the accumulated delays may be overcome by the deadline for implementation of the PDP - 2024

**PDP 3: Strengthening the implementation of alternative measures to imprisonment.** The project is contracted to the General Directorate for Execution of Sentences. Project objectives will be achieved in cooperation with the Probation Service Agder (Norway). The main activities of the project are aimed at improving the professional qualification of probation officers and the specific functions they perform in the penitentiary system. This implies the specific competencies to ensure the effectiveness of the probation measures imposed by the court. The concept is to provide a complete system of trainings that meets the needs of probation officers and is relevant to the needs of persons sentenced to probation.

**Outcome 2: Improving the application of the European legal framework in the Bulgarian justice system**

**PDP 5: Increasing the national capacity for effective implementation of the rulings of the European Court of Human Rights (ECHR).** The project has been contracted to Directorate of Processual Representation with the ECHR. The main project activities include:

* Introduction of procedures with clear rules for the appointment and selection of magistrates, as well as clear rules for the professional development of magistrates based on professional and personal qualities.
* Increasing the capacity to implement the rulings of the European Convention on Human Rights by posting judges to the European Court of Human Rights.
* Capacity building and study of restorative justice mechanisms applied in the judicial systems of the Kingdom of Norway.

Currently, a major problem in the implementation of the project is the pandemic situation and the related difficulties in seconding judicial staff to the ECHR in Strasbourg.

**PDP 6: A modern learning environment for judges, prosecutors, investigators and other members of the professional community.** The project is implemented by the National Institute of Justice in partnership with the Norwegian Judicial Administration. The project envisages the creation of an integrated, coordinated and structured training environment for judges, prosecutors and other members of the professional community, ensuring improved implementation of the European legal framework set as Outcome 2 of the Justice Programme, NFM 2014-2021. The effective implementation of European Union law and fundamental rights is key to achieving the defined goal at the programme level, aimed at strengthening the rule of law. This includes:

* Strengthening the professional knowledge and skills of magistrates and others working in the judiciary for the accurate, uniform and consistent application of the laws and values of the EU;
* Modernization of the training environment - The experience of the National Institute of Justice in the field of judicial training so far shows that, when conducting trainings, it is also necessary for Bulgarian magistrates and judiciary professionals to be provided with adequate and accessible training resources (learning, extracurricular and work environment), to provide them with the opportunity to acquire systematic and in-depth knowledge and exchange of up-to-date information and experience, taking into account their current engagement.

**Outcome 3: Improved capacity of Bulgarian institutions in the field of juvenile justice**

**PDP 4: Improving police capacity and establishing favourable conditions and procedures for children in contact with the justice system and children in need of protection**. The project beneficiary is the Ministry of Interior and is related to the construction and/or repair of premises that are specially equipped for the detention and protection of children who have contact with justice. The procedures for its implementation have not yet started due to differences between the PO and the beneficiary on the manner in which the construction of the so-called "blue rooms" in accordance with the requirements and provisions of the Public Procurement Act and ensuring lawful and appropriate spending of the funds provided under the public procurement for the implementation of project activities.

**Small grant scheme** “**Improving the capacity of Bulgarian institutions in the establishment of favourable conditions and procedures for children who have contact with the justice system”.** The small grant scheme has not yet started. It is not linked to PDP 4 but complements the implementation of the objectives of this outcome. Due to the uncertainty about the manner of implementation of PDP 4 and whether a contract will be concluded with the General Directorate of National Police, the PO should make an assessment after consultation with stakeholders of the programme and to possibly change and/or supplement the outcome 3 indicators through the implementation projects under the small grant scheme.

**Outcome 4: Improved capacity of Bulgarian institutions in the field of domestic violence and gender-based violence**

**PDP 7: Prevention and counteracting violence against women and domestic violence.** The project is implemented by the National Institute of Justice. Its objective is to strengthen the capacity of law enforcement and the administration to more effectively apply established security standards and institutional practices for preventing and counteracting gender-based violence and domestic violence. The project builds on the results of another PDP ("Improving the national framework in line with Council of Europe (CoE) standards and strengthening the capacity of competent institutions to work on cases of gender-based violence and domestic violence"), implemented in the previous programming period and will be carried out in close coordination with the PDP of the National Legal Aid Bureau (NLAB). The latter aims to implement and evaluate a pilot regional mechanism for cooperation in the field of gender-based violence and domestic violence.

**PDP 9: Improving access to justice for people living below the poverty line with a special focus on women, children and the Roma community.** The project is implemented by the National Institute of Justice and includes activities related to facilitating access to legal aid and justice for 250 representatives of vulnerable groups, including victims of domestic and gender-based violence, children, women of minority groups and/or from remote and geographically isolated areas through:

* Introducing mobile teams for legal aid in Stara Zagora, Veliko Tarnovo and Varna;
* The establishment of a pilot mechanism for cooperation at the local level in the field of domestic violence and gender-based violence, covering representatives of municipal authorities, local units of the Ministry of Interior, Ministry of Labour and Social Policy, and judiciary professionals and lawyers in Stara Zagora, Veliko Tarnovo and Varna;
* Improving the coordination between the administrative units at the local level in support of victims of domestic violence and gender-based violence.
* Investment in the capacity of 300 lawyers registered in the National Register for Legal Aid and improving their knowledge on the topics of prevention of discrimination, overcoming stereotypes and prejudices, domestic violence and gender-based violence.
* Improving the bilateral relations between Norway and Bulgaria by exchanging experience and conducting 2 working visits in the field of domestic violence and gender-based violence.
* Improving the level of awareness of the general public regarding access to legal aid and the empowerment of vulnerable groups, in particular victims of domestic violence and gender-based violence, to defend their rights through legal aid.

**Small grant scheme “Improving the capacity of Bulgarian institutions in the field of violence against women and domestic violence”.** The small grant scheme has not started. The procedure for selection and evaluation of projects is one and is related to outcomes 3 and 4.

**Bilateral outcome: improved cooperation between donor and beneficiary institutions.** The objective of the programme, in addition to the results in the judiciary and the penitentiary system, is to establish mutual trust, a spirit of cooperation and relations of cooperation and partnership between the relevant institutions in Bulgaria and Norway. In the framework of the Cooperation Committee under the programme two meetings were held in 2019 - in April in Sofia in October Liliestroеm (Norway).

The programme is implemented in close cooperation with foreign partners - the Ministry of Justice, Norway, the Norwegian Directorate of Public Security and the Norwegian Correctional Service (KDI). In addition, the Council of Europe, as an International Partner Organization, and the Norwegian Judicial Administration are actively involved in the consultation and implementation of projects. A number of aspects of the programme and the PDPs were discussed within two synergies networks in the field of correctional services and domestic violence in the NFM cooperation network, in which the beneficiary countries from six countries, supported by the NFM, participate. Within these cooperation networks, several strategic meetings were held in the programme area PA 19 in 2019 (in Romania, Great Britain and Norway) and in 2020 in Strasbourg.

**Based on the evaluation, the following conclusions can be drawn regarding the status of the *Justice* programme as of 30 June 2020:**

First, contracts have been signed for most PDPs in the two programme areas. The exception in this respect is PDP 4, where an institutional agreement has yet to be reached with the Ministry of Interior on how to implement the project-related public procurement. The small grant scheme under the programme has not started yet. It is linked to the indicators that are expected to be achieved by PDP 4. However, according to the PA, there is readiness for the small grant scheme (with expected results in the field of juvenile justice) to be launched when there is readiness on the part of the contractor and clarity regarding the funds provided for the project

Second, the trainings, meetings and communication between legal professionals and representatives of different social groups provided for in many of the PDPs are hampered by the pandemic situation. This is compensated by conducting some of the planned activities online, but others remain unfulfilled. In this respect, additional delays are likely to accumulate on many projects. It is also likely that some of the planned activities that are affected by the pandemic situation will need to be modified.

Third, some of the so-called soft measures, associated with problems of vulnerable groups, especially Roma. There are some difficulties with site visits or field work. Where possible, online contact is used successfully, and discussions and trainings are also conducted online. Although this creates some risks for delays and for performance indicators, beneficiaries (e.g., the Directorate General for the Execution of Sentences, National Institute of Justice) are reconfiguring their online programmes and, according to the PO, the risks will be overcome.

***2.2.  Changes, deviations, and delays in the implementation of the programme***

The main changes and delays related to the implementation of PDPs and the small grant schemes under the *Justice* programme can be summarized as follows:

First, the implementation of the “hard” measures under the various PDPs (1, 2 and 4), which include repair or construction work, are in many cases related to the need for a precise assessment of the planned parameters of construction and installation works. Difficulties in this respect have been overcome by launching public procurement for design (PDP 1 and PDP 2). This will ensure consistency between construction and repair works and the available financial resources. In some cases, this leads to a change in the assignments of the public procurement required for the implementation of the projects. So far, these changes have not caused risk situations (inability to implement projects) but have led to certain delays. The accumulated delay is about 6 months, but the time until the deadline for implementation of activities (2024) allows this delay to be compensated and the projects and objectives to be implemented on time. According to the PO, the necessary corrective actions (attracting experts and external evaluators) are successful and guarantee, albeit in a tighter schedule, the implementation of plans and projects.

Second, for some of the projects (especially PDP 1) the submitted bids did not meet the preliminary expectations. This requires modification or change of assignments and corresponding delays in the implementation of projects. According to the PO, these problems and/or delays can be overcome. However, it would be good to review the implementation of public procurement related to construction and repairs in the end of 2021, and to take corrective action if necessary.

Third, the pandemic situation creates difficulties in the implementation of the so-called. soft measures under some PDPs, as well as in the implementation of projects under the small grant scheme (after their launch).

***2.3  Identified problems in programme management***

The PO team has significant experience and is well equipped to deal with operational problems, taking into account the experience gained from the previous programming period. The management of the programme is well provided with staff and resources, and the difficulties related to the change of the leadership of the Ministry of Justice and the absences of team members related to the pandemic situation have been successfully overcome. **No significant problems related to the management of the programme have been identified.**

Continuing education is also provided, which is oriented towards ongoing changes in the socio-economic context, in the legal framework and the institutional framework, in the management and control procedures. There are no problems with payments of the programme team. As of August 30, 2019, the programme staff has uploaded all projects into the new management system and has overcome the initial difficulties of working with the system.

The work and cooperation with foreign and national partners of the programme is assessed as very good. Several official workshops are conducted annually, and over time, informal lines of communication have developed. The communication with partners from the donor country - University College Norwegian correctional service Prison Ona, through chamber Solholmen , Probation Service Agder , Ministry of Justice (Norway), the Norwegian Courts Administration and the Norwegian Centre for Human Rights is also excellent.

1. **Evaluation of the effectiveness and efficiency of the programme**

 In this section, the implementation of the programme is analysed in accordance with the following key evaluation criteria:

* Whether the support provided under the programme is focused on the most effective and efficient interventions in terms of the objectives of the two financial mechanisms, as well as the needs and priorities of the country in the programming period?
* To what extent have the outcomes, indicators and, respectively, the objectives at the programme level been achieved or are expected to be achieved? Is there a risk of not achieving the set outcomes and planned values of the indicators and what factors (internal or external to the programme) contribute to this risk?
* Are the necessary resources (financial, time, administrative capacity, procedures, etc.), available to ensure effective and efficient achievement of the planned outcomes, indicators and targets?
* Has the programme operator identified risks for delays in the implementation of time- dependent measures and interventions and how is this risk addressed?

***3.1  Evaluation of effectiveness***

**Most *Justice* programme projects are in the early stages of implementation. The concrete results of their implementation could be assessed only when the preliminary stage of implementation is completed - initial structuring and announcement of public procurements, i.e., the phase in which most of the PDPs currently are. The implementation of the small grant scheme has not started, but the PO does not assess this as a risk at this stage.**

The indicators for evaluation of the results are quantitatively measurable and are set in the programming stage. They are assessed as adequate and reliable - there are no proposals for their change. However, it is still too early to assess the level of implementation of most indicators.

The implementation of the programme and the progress made are monitored by the PO. Regular online meetings are conducted with project teams to monitor the implementation of projects, results achieved and the target values of the indicators.

**The planned interventions at this stage can be assessed as appropriate, effective and realistic. They are adequate to the needs and priorities of Bulgaria and largely correspond to the problems and needs of the   target groups of the programme.**

***3.2.  Evaluation of the financial resources and efficiency of the programme***

At the programming phase, in cooperation with NFM representatives, the assessment of the volume and distribution of the required financial resources has shown that compared to the previous programming period, resources should be significantly increased (approximately three times) to reach a total funding amounting to about 30 million euro (NFM) and about 5,3 million euros of national funding. The initial assessments of the donor country are that most of the funding should be directed to the so-called hard measures, including repair and construction of facilities related to arrests, prisons, prison dormitories, rooms for providing for work with children who have contact with justice, etc. This is due to the observed large deviations of the facilities of the penitentiary system from international standards. Ultimately, in terms of financial resources, the final ratio between hard and soft measures remains 70:30, i.e., most of the funds are directed to hard measures.

According to the assessment of the PO, the funds provided under the NFM for the implementation of the planned activities are sufficient for the implementation of the set goals and implementation of the activities under the PDPs. At present, **the envisaged financial resources and their allocation meet the needs of the target groups.** They also adequately reflect the available absorption capacity in Programme Areas 19 and 21.

The *Justice* Programme envisages a total of about 10% of the total eligible costs of the programme to be directed at improving the situation of the Roma population. For some of the PDPs under the programme, especially those involving hard measures, it will probably be difficult to assess how much of the funds have been used for the needs of vulnerable groups, especially the Roma population, as they are rather aimed at improving the material conditions of the penitentiary system as a whole.

**Overall, the amount of financial support provided by NFM under the Justice programme can be assessed as significant and consistent with the set programme objectives and needs of the target groups. The implementation of the objectives and PDPs under the programme will contribute to a significant improvement of the material conditions and the qualification of the staff and will also contribute to the introduction of new practices in the penitentiary system of the country.**

***3.3.  Risks for the implementation of the programme***

In the Strategic Report for the period 01.08.2019 - 31.07.2020, the NFP identifies several changes related to the implementation of the programme and the signing of an annex to the main agreement (March 2020) but does not identify specific risks. However, such risks are possible and require an assessment of the situation at the end of 2021. The Annex reflects the changes in the implementation of the training programmes (PDP 6). **The main risks identified by the NFP in this report include**:

First, the negative attitude of local communities towards some of the measures under the programme (for example, the building of the new prison in the village of Samoranovo, as well as some measures related to domestic and gender-based violence, juvenile justice, vulnerable groups). This risk has been addressed by the head of the PO. Talks were held between the head of the PO and directors of the General Directorate for Execution of Sentences with representatives of the local authorities, and an interview with the head of the PO was broadcast on local television. This has contributed to overcoming the difficulties. Currently, there are no negative attitudes on behalf of the local community and local authorities in connection with the construction of the new training center and pilot prison and other activities related to the programme.

Second, not achieving the target values of indicators related to juvenile justice if the project organizer refuses to sign the contract under PDP 4. Meetings were held between the NFP, PO and the project organizer General Directorate "National Police" to discuss the implementation of this project, public procurement and the non-fulfilment of one of the indicators for pilot centres for work with children at risk (at this stage only two centres can be built, while the Programme Agreement provides for three centres).

Third, delays in the implementation of projects involving infrastructure measures (e.g., the new pilot prison and training centre), as well as the related soft measures. Delays in public procurement are also possible, incl. due to lengthy appeal procedures. They may have a particular negative impact on the implementation of PDP 1 and PDP 2, which provide for significant infrastructure components. These risks are also indicated by the PO in the online interview. The identified risks include the excessive prolongation of the pandemic situation, non-implementation of some of the soft measures under the PDP, delay in the start of the small grant scheme. The PO should prepare for a scenario where the small grant scheme for results 3 and 4 can be launched without further delay.

1. **Roma focus of the programme**

This section includes the results of the analysis and evaluation on several key questions linked to the goal of improved Roma inclusion:

* To what extent are the objectives to ensure Roma focus of the *Justice* programme fulfilled?
* Is compliance with the national policies for Roma integration ensured (National Strategy of the Republic of Bulgaria for Roma Integration 2012 - 2020; National Action Plan for the period 2015-2020 for implementation of the National Strategy of the Republic of Bulgaria for Roma Integration 2012-2020)?
* Is the consultative process consistent with the needs of schemes for financial assistance of the Roma as a target group?
* To what extent is there complementarity and synergy with other projects and programmes. Is there any upgrading of results related to the Roma focus of the EEA FM from the previous programming period (2009 - 2014):
	+ In the implementation of integrated measures for local development and poverty reduction through education, employment and healthcare (including initiatives aimed at the inclusion and integration of vulnerable groups).
	+ How the experience of identical procedures at national level and foreign practices has been used.
	+ What type of monitoring is envisaged: reporting on the number of the Roma participating in the implementation of activities or the number of products representing Roma culture and how this participation has contributed to real change in the impact of the projects and the programme?

***4.1 Fulfilment of the objectives for providing Roma focus on the programme***

This priority is clearly outlined in the Memorandum of Understanding and the Programme Agreement for the current programming period of the EEA FM and the NFM. The Justice programme has a clear Roma focus with regard to several PDPs:

* PDP 4: Improving police capacity and establishing favourable conditions and procedures for children in contact with the justice system and children in need of protection;
* Small grant scheme: Improving the capacity of Bulgarian institutions in the field of establishing favourable conditions and procedures for children who have contact with the justice system;
* PDP 7: Prevention and counteracting violence against women and domestic violence.
* PDP 9: Improving access to justice for people living below the poverty line with a special focus on women, children and the Roma community;
* Small grant scheme: Improving the capacity of Bulgarian institutions in the field of violence against women and domestic violence.

These PDPs, although without a clear Roma focus, address target groups, among which a large part of the final beneficiaries belong to the Roma community. The concept underlying the design of the PDPs is that, in principle, the needs of all vulnerable groups are being addressed both in terms of access to justice and in terms of the residence of representatives of these groups in the institutions of the penitentiary system. With regard to the latter, according to the PO, it is difficult to target interventions towards one specific group, but rather aim at non-discriminatory treatment of all groups with the ultimate goal of improving conditions in detention facilities, prisons, rehabilitation, resocialization and reintegration of prisoners[[9]](#footnote-9).

An opportunity for direct participation of Roma organizations exists in the small grant scheme, which address the problems of the Roma community in the described areas, and also through the direct participation of Roma organizations as beneficiaries and project implementers. These opportunities were presented by the PO at the NFM Consultative Meetings, which were attended by Roma organizations and the latter showed interest in the implementation of the programme.

With regard to the direct participation of the Roma community (including Roma organizations and NGOs) in the consultation process on the structuring of projects under the programme, this opportunity has been used to a limited extent. Rather, it relies on the active participation of Roma organizations in the project implementation process, as well as projects that are directly directed at solving the problems of the Roma community.

**The proposed initiatives and measures under the Justice programme are generally in line with the National Strategy of the Republic of Bulgaria for Roma Integration 2012-2020 (NSRBIR), with the National Action Plan for the period 2015-2020. Implementation of NSRBIR and the Framework Programme for the Integration of the Roma in Bulgarian Society (2010-2020).**

***4.2.  Risks of not achieving the goal of Roma inclusion and empowerment***

 The main problems that are relevant to the Roma population and are addressed by the Justice programme are the following:

* Increased (compared to the national average) involvement of Roma community members in criminal activities. This contributes to more frequent contacts with law enforcement institutions and increases risks associated with a poor access to justice for members of this community. Failure to implement some of the programme's activities aimed at improving access to justice, risks leaving the current status quo unchanged.
* The higher level of unemployment among people from the Roma community raises the issue of rehabilitation, resocialization and reintegration of Roma prisoners more acutely in comparison to other groups in the Bulgarian society. In this respect, the non-fulfilment of the objectives of the Justice programme in the field of improving the penitentiary system leads to a smaller chance of Roma prisoners for reintegration into society.
* The problems of juvenile delinquency, domestic violence and gender-based violence are more acute among people of the Roma community than in other groups. In this sense, the PDPs and the small grant scheme under the Justice programme would make a significant contribution to improving the situation. Accordingly, the non-fulfilment of the objectives and the PDPs under the programme would lead to the omission of significant opportunities.

**One of the major problems in terms of Roma focus at this stage of programme implementation is that there is no clear mechanism to engage representatives of the Roma community in the implementation of projects under the programme.**

The Roma community and the Roma organizations, at least at this stage of the programme implementation, turn out to be rather beneficiaries of the programme and possible promoters and target groups of some of the projects.

## **Main Conclusions and Recommendations**

This section presents the **main conclusions and recommendations** based on the analysis and evaluation of the implementation of the programmes financed under the EEA FM and NFM 2014-2021. They correspond to the specific objectives of the mid-term evaluation and are structured accordingly:

* Progress and achieved results in the implementation of the programmes since the signing of the respective Programme Agreements by June 30, 2020;
* Appropriateness, efficiency and effectiveness of the implementation of the programmes financed under the EEA FM and NFM 2014-2021;
* Risks of failure to achieve the planned results of the programmes financed under the EEA FM and NFM 2014-2021;
* Identified problems and good practices from the implementation of the programmes financed under the EEA FM and NFM 2014-2021.

In each of these areas of evaluation, **recommendations** have been made aimed at overcoming the problems identified that may serve in the management decision-making process.

The presented conclusions and recommendations are in line with the key summary issues of the mid-term evaluation of the programmes financed under the EEA FM and NFM 2014-2021:

* What are the main conclusions from the point of view of programme management and implementation?
* What are examples of good practices in programme management and implementation?
* What recommendations and specific suggestions for improving the management and implementation of the programmes can be made?
* What are the main examples of good practices regarding partnerships with organizations from the donor countries at programme/project level and recommendations for their improvement?

## **General conclusions and recommendations on EEA FM and NFM 2014-2021**

## 4.1 Appropriateness of the implemented programmes

**The goals of the implemented programmes can be assessed as adequate to the needs and problems of their respective target groups**. Stakeholders have been consulted, both at national level and by donor countries, emphasizing the main challenges of the evaluated programmes. They have been developed in accordance with the main national and European strategic and programme documents in the respective programme areas. The priorities, objectives and eligible project activities set in the macro framework of the various programmes correspond to the needs, problems and limitations of the main target groups. They are identified in a broad and systematic process of consultation and coordination with key stakeholders, incl. potential beneficiaries of the programmes. The needs identified by the stakeholders in the preparation of the programmes determine the logic and content of the planned interventions. **At the time of the mid-term evaluation, there is no need to supplement or change the objectives and priorities of the evaluated programmes.**

At the same time, the national context has developed since the signing of the Memorandums of Understanding and the Programme Agreements. Although in general the objectives and activities of the programmes remain relevant, they must be carefully monitored and adjusted if necessary, so that they continue to meet the key needs of the target groups. **The general objectives and priorities may remain unchanged, but they need to be constantly adapted to the changing national context**, and the programmes should maintain a strategic approach to the activities carried out. Some key stakeholders work in areas covered by the other programmes (e.g., the European Structural and Investment Funds - ESIF), and therefore, the situation must be monitored regularly to ensure that the programmes remain up-to-date and that all measures are implemented in a coordination and complementarity with other national and external initiatives.

Regarding the design of the programme, two partner organizations from the donor countries express considerations that could be taken into account when structuring the next programming period of the EEA FM and the NFM. According to the Norwegian Association of Local and Regional Authorities, the way in which the programme areas for local development (PA 10), inclusion and empowerment of Roma (PA 07) and children and young people at risk (PA 08) are combined is to the disadvantage of a fully systematic and a comprehensive approach to local development, as the focus is usually on measures to support disadvantaged groups and not on the dynamic development of local communities. If local development is the main focus of the programme, there could be more integrated measures in this area. The partner of the Justice programme from the donor country (Norwegian Correctional Service - KDI) proposes in future programming periods, with a separate programme for the correctional services sector.

## 4.2 Progress and results achieved in the implementation of the programmes

All agreements for the implementation of the six evaluated programmes have been signed and their Management and control systems (MCS), managed at the national level, have been approved by the FMO, and MCS at programme level – by the NFP. The integration of the programmes in the Information System for Management and Monitoring (ISMM) has been implemented, which is a successful step to ensure compliance with the principles of good governance and transparency. Matchmaking events were held on the programmes in a constructive spirit of cooperation and friendship. **The implementation of the activities under all programmes has started, which, however, is uneven and varying progress has been observed in their implementation.** Programme operators have prepared and launched application procedures for 26 pre-defined projects and for 11 calls for proposals. Following the evaluation and selection procedures, grant contracts were signed for 23 pre-defined projects and for four projects approved under one open call. As of the final date of the mid-term evaluation (30 June 2020), evaluation and selection procedures are under way for one small grant scheme, three open calls and four pre-defined projects. In four of the announced calls for proposals, the deadline for submitting project applications has not expired. Guidelines for applicants for three open calls in the *Renewable energy, energy efficiency and energy security*, the *Cultural entrepreneurship, heritage and cooperation* and the *Justice* programmes are still in development.

**According to the Norwegian Association of Local and Regional Authorities, DPP under the programme, delays in its implementation have been registered (mostly at the project level).** They are manifested in the relatively slow development of the programme and the signing of the programme agreement (caused by all parties); the delayed development of the ISMM system; the heavy and cumbersome Bulgarian administrative system, the somewhat strong centralization of the activity of the POs, and the limited delegation of tasks and responsibilities. The delay of the Bulgarian Red Cross is assessed as more significant, where a discrepancy is found between the staff costs and the delayed delivery of equipment.

**It can be concluded that starting and reaching the implementation phase of the projects takes a long time, as in the middle of the programming period, a significant share of the planned projects have not started or are in the initial implementation phase, which creates a potential risk for their effective implementation**. Due of various circumstances, three pre-defined projects were withdrawn by the project promoters - one in the *Local development, Poverty reduction and improved involvement of vulnerable groups* Programme with the Council of Europe project promoter and two in the *Home affairs* Programme with project beneficiaries the Agency for Child Protection and the State Agency for National Security. As the objectives of the projects remain a priority, the programme operators prepared proposals for their replacement by two other projects and one open call. The proposals are in the process of discussion with the NFP and FMO.

## 4.3 Efficiency and effectiveness of the implementation of the programmes

**In general, the implementation of the programmes, projects, specific measures and activities financed by the EEA FM and the NFM is at an early stage or has not started at all, which does not allow for definitive assessments of their effectiveness and efficiency**. In terms of effectiveness, conclusions have been made primarily in relation to the assessment of the measurability, feasibility and likelihood of achieving the objectives and expected results of the programme. The main external and internal risks of their non-achievement are also identified, which are presented in paragraph 4.3. Regarding the efficiency, conclusions have been made regarding the sufficiency of the total amount of the provided financial assistance under the EEA FM and the NFM, the utilization of financial resources, and proposals for relocation of funds.

***Effectiveness of programme implementation***

**The planned initiatives in the implemented programmes are aimed at interventions, which at this stage can be assessed as appropriate, realistic and traceable in terms of the objectives of the EEA FM and NFM**. They are adequate to the needs and priorities of Bulgaria in the programming period and largely correspond to the problems and needs of the target groups of the programmes.

To measure the degree of achievement of both the general and the specific objectives of the programmes, a **system of indicators** and the expected results of the supported interventions has been developed, in order to monitor the progress of their implementation. This system can be assessed by applying the widely accepted SMART criteria in terms of the specificity, measurability, achievability, realism and timeliness of the indicators, which are expected to be:

* Specific - the indicators are specific and adequately reflect the content of the general and specific objectives of the programme.
* Measurable - indicators are aimed at a desired future state and are quantified (most of them) to allow measurement.
* Achievable - there are set target values for the indicators, which are achievable, but in some of them no basic values have been indicated.
* Realistic - the target values of the indicators are realistic and relevant to the expected results.
* Timely - specific deadlines are defined for the implementation of the programmes and for reaching the target values of the indicators.

The donor partner (Norwegian Association of Local and Regional Authorities) reports some problems with the measurement of specific indicators in the GALOP project, as measuring their values implies significant financial costs which is not planned in the project budget. Discussions are underway to address this issue, because if some of the indicators are difficult to measure, it is not clear whether they have practically been achieved.

The restrictions caused by the pandemic situation have led to changes in the schedule or the manner of implementation of the activities under the agreed projects, to the postponement of calls for project proposals, and extension of the deadlines for their submission for evaluation. So far, however, no insurmountable obstacles to achieving the goals and results of the programmes have been identified, despite the difficulties and the lower effect of some of the implemented activities (field work, exchange of experience, exchange of visits with partner organizations, organization of educational and cultural events, monitoring of ongoing projects on site and others).

***Efficiency of programme implementation***

The efficiency of the implementation of the programmes financed by the EEA FM and the NFM has been assessed in several aspects: first, from the point of view of the sufficiency of the total amount of financial assistance provided to achieve the objectives and priorities of the programmes; second, relevance to the needs of the target groups; third, the appropriateness of the costs incurred, and the irregularities identified. Specific proposals for a change in the amount of funds under the programme and a possible relocation of financial resources were also explored.

**The amount of the provided financial support under the EEA FM and the NFM under the individual programmes can be assessed as significant, corresponding to the set programme goals and the needs of the target groups**. This assistance complements the existing external funding provided by the European Structural and Investment Fund (ESIF 2014-2020) through the EU operational programmes "Science and education for smart growth", "Human resources development", "Growing regions", "Development of rural areas". Funding is also provided by the Bulgarian-Swiss Cooperation Programme with a total volume of 76 million Swiss francs in priority areas for the country (including the inclusion of vulnerable groups). **The financial resources allocated for the implementation of specific projects are also assessed as sufficient to achieve the expected results**. However, according to the donor partner (the Norwegian Association of Local and Regional Authorities), more resources are needed in the field of local development to achieve tangible results, while for other areas the resources seem sufficient.

In carrying out the mid-term evaluation of the progress in the implementation of the programmes of the EEA FM and the NFM 2014-2021, a review was made of the annual audits for 2018 and 2019 presented to the EEA FM Office. The audit authority performed an audit in the period June - August 2019 of projects under four programmes and funds within the FM of the EEA and NFM 2014-2021, which have certified and declared expenditures for the second accounting year - 2018. These are the *Local development, poverty reduction and improved inclusion of vulnerable groups* programme; *Home affairs* Programme; *Technical assistance fund* and *Bilateral relations fund*. The audits identified some cases of non-compliance with the rules for public procurement: restrictive requirements in the selection award criteria; illegal partition of the subject of the order; illegally rejected bidder; the winning bidder does not meet certain tender conditions. The financial dimension of the detected irregularities related to non-compliance with public procurement rules amounts to EUR 796.53. The PO and the NFP have implemented all recommended financial corrections and the respective irregularities have been registered and reported. The audit authority analysed the nature, significance and causes of the errors, concluding that they were random and not related to systemic weaknesses. Detailed information on the imposed financial corrections is presented in the second annual audit report within the EEA FM and NFM 2014-2021 from February 2020.

The second audit of certified and declared expenditures projects for the third accounting year (2019) for the *Home affairs* programme was implemented in the period until July 30, 2020. The programmes and funds with certified and declared expenditures for 2019, which are scheduled to be audited by the end of 2020, are the *Local development, poverty reduction and improved inclusion of vulnerable groups* programme and Technical assistance fund and Bilateral relations fund.

In the period November 2019 - June 2020 audits were also performed to verify the effectiveness of functioning of the set management and control systems (MCS) for five programmes and funds within the EEA FM and NFM 2014-2021. The final audit reports submitted to the PO, NFP and CC are the following:

* *Home affairs* Programme - on March 10, 2020.
* *Local development, poverty reduction and improved inclusion of vulnerable groups* Programme - on March 11, 2020.
* *Renewable energy, energy efficiency and energy security* Programme - on 03.07.2020.
* Technical assistance fund and Bilateral relations fund - on 22.05.2020.

**The findings of the system audits include**: identification of ineligible costs, which are a result of technical errors; some of the activities, processes and documents related to management costs of the three audited programmes of the Technical assistance fund and the Bilateral relations fund which are not stored in computerized systems; lack of an audit trail for the verified expenditures incurred by beneficiaries under the *Cultural Entrepreneurship, Heritage and Cooperation* Programme under the Bilateral relations fund; lack of an approved document for inspection and assessment of the presence or absence of irregularities on registered signals for irregularities in the MCS under the EEA FM and NFM 2014-2021; use of a control checklist which is not approved or included in the MCS of the *Renewable Energy, Energy Efficiency, Energy Security* Programme. In conclusion, the Audit Authority categorized the MCS assessment of the three audited programmes and the NFP into Category 2 on a scale of four categories (“functioning, but some improvements needed”).

There is an increased interest for some of the funded initiatives, but the number of supported projects is limited. At the same time, other projects are dropped, their launch is postponed or interest in them is limited. In this regard, in the course of the interim evaluation, some proposals were made for relocation of financial resources under some of the implemented programmes. There is currently a proposal from the PO for reallocation of funds under the *Local development, poverty reduction and improved inclusion of vulnerable groups* Programme from the INCLUDE project to the scheme for establishment of new youth centres. This proposal is still under discussion but will probably be supported by the international partner organisation Council of Europe, as shared in the online survey. Relocating additional financial resources would provide an opportunity to support good projects for the construction of youth centres in other municipalities that express a desire and readiness for this initiative. Similar possibilities could be considered in terms of expanding the network of home care centres in the community for people with chronic diseases and permanent disabilities, which is developing mainly in poorer municipalities in North-western Bulgaria.

Within the *Environmental protection and climate change* Programme, it has been agreed that the budget allocated to the small grant scheme "Pilot Models for Seawater Treatment" (SGS 1) would be used to fund good project proposals submitted under the same outcome, for example to the small grant scheme "Marine Waste Reduction Measures" (SGS 2). The reason is the low interest in SGS 1 (in the first call only one project proposal was submitted and rejected by the PO due to its low quality).

The implementation of the *Cultural entrepreneurship, heritage and cooperation* Programme is assessed by the donor partner (the Norwegian Arts Council) as too slow. The time for the implementation of major cultural heritage projects, which include the construction of infrastructure under Outcome 1, is limited, and the development of a call for proposals has not yet started. The PDC proposes to reallocate funds from outcome 1 to outcome 2 to ensure the efficient use of the financial resources of the programme. The projects under Outcome 2 have a shorter implementation period (1-2 years), and funds can be transferred to a second call for projects under this outcome. However, the evaluator does not recommend the acceptance of the DPP proposal, as it may lead to financial restriction of result 1, where infrastructure costs are foreseen (revitalization and renovation of spaces for presentation of cultural heritage, job creation, etc.). This would have a negative effect on the sustainability and scope of the implemented programme. The PO considers that the redirection of funds from Outcome 1 is not necessary, as the implementation of projects within the framework of the outcome will significantly contribute to achieving the objectives of the programme and ensuring the sustainability of the achieved results. This position is also supported by the NFP.

For the *Renewable energy, energy efficiency and energy security* Programme, a procedure has been launched to redirect funds from small grant schemes to financing of another 3-4 projects for rehabilitation and modernization of street lighting, where very good project proposals have been received.

## 4.4 Assessment of the risk of not achieving the planned goals and results

In the course of the interim evaluation, several external and internal risks were identified to achieve the objectives and results of the EEA FM and the NFM.

**A. External risks**

***Epidemiological risks***

The proliferation of COVID-19 is forcing governments, including the Bulgarian government, to impose severe restrictions on mobility and public health measures. The restrictions caused by the pandemic have led to changes in the schedule or the manner of implementation of the activities under the agreed projects, to the postponement of the launch of the calls for project proposals, to the extension of the schedules of the evaluation procedures. Personal contacts, organizing events, visits and ongoing on-site monitoring, planned trips in the country, meetings with international partners, exchange of experience and the establishment of bilateral partnerships are also difficult. Working in an online environment reduces these risks, but does not eliminate them completely, and some of the planned activities have been postponed. In general, **the implementation of anti-pandemic measures does not yet pose a threat to the achievement of the objectives of the implemented projects, but it might occur, if the current epidemiological situation is prolonged further.**

***Economic risks***

The COVID-19 pandemic has led to a significant contraction in production, trade and a deteriorating labor market. Bulgaria is among the countries most affected by this pandemic in the EU. According to some forecasts, the Bulgarian economy will begin to recover smoothly in 2021 but will not reach pre-crisis levels of key economic indicators (gross domestic product, economic growth, investment, unemployment, etc.). Funding from the EU and other donors, including the EEA FM and the IMF, will remain a significant financial resource for overcoming the negative economic and social consequences of the COVID-19 pandemic. This makes the implementation of the programmes even more exigent. At the same time, the possible long-term continuation of the economic difficulties in the country may create problems in the implementation of some of the programme initiatives.

***Political risks***

Political instability and the upcoming parliamentary and presidential elections in 2021 may lead to changes in programme management teams and delays in programme implementation. The NFP and the programme operators have experience in dealing with challenges arising from government changes and can reduce this risk by relocating responsibilities to ensure strict compliance with the Management and Control Systems.

***Risks of manipulative formation of negative public attitudes towards FM of the EEA and NFM***

A relatively new risk for the implementation of the programmes supported by the EEA FM and the NFM (2014-2021) is the manipulative distrust created by certain political and media circles in the financial support from Norway, in particular with regard to childcare. In the beginning of 2019 the draft National Strategy for the Child 2019-2030, developed in broad consultations with the participation of over 200 NGOs and institutions working on children's rights, was presented for public discussion. The focus of the strategy is to better protect the rights of children, and to support children and the respective vulnerable families. However, the public debate is distorted by the imposition of the idea that the strategy reduces the rights of Bulgarian parents and that its goal is "to enable social services to take children from their families." Opponents of the strategy claim that it is based on the Norwegian model of child protection, and was drafted by Norway, which has special interests in Bulgaria's childcare reform. It should be explicitly emphasized that under the EEA FM and the NFM no funding was provided for the development of a National Strategy for the Child, and there were no funded projects aimed at introducing elements of the Norwegian child protection system. This campaign goes beyond the childcare system and also targets NGOs, their international donors, foreign aid in general, human rights organizations and activists, especially those related to the rights of Roma and other vulnerable groups (LGBT, immigrants, refugees).

The NFP closely monitors the topic and on June 3, 2019, in coordination with the Norwegian Embassy, published an opinion on the Internet portal of the Financial Mechanisms. The opinion denies any link between the National Strategy for the Child and the EEA FM and the NFM. The decision of the NFP is to emphasize the positive news and good practices for successful cooperation between organizations and institutions from Bulgaria and Norway, as a counterpoint to the negative campaign. Positive examples of popular results from supported projects and the positive role of donor countries are provided. The approach was presented at the annual meeting in October 2019, including the idea of project visits by journalists. On this basis, a concept for the visits was developed, discussed at a working meeting with the Norwegian Embassy on March 5, 2020. The signing of a media monitoring agreement also allows the NFP and the Norwegian Embassy to monitor the daily information flow and react if necessary, in cooperation with the POs, to publications with incorrect content.

**A. Internal risks**

***Insufficient administrative and project management capacity in small municipalities***

This risk can be mitigated through training and support by the programme operators in the project application and implementation process. It is also possible to select projects in several stages (for example, initial application in the form of conceptual ideas and subsequent development into complete project proposals). In addition, the PO can provide ongoing support and monitoring to project beneficiaries during project implementation.

It has also been found that the capacity of municipalities to design adequate and meaningful integrated interventions for Roma inclusion and empowerment is limited. Municipal projects are well developed technically, but without a real understanding and focus on sustainable social change of the situation of Roma communities. Therefore, the way of preparing these projects and the degree of involvement of the local Roma communities is crucial from the point of view of Roma empowerment.

***Delayed procedures for changing / updating programmes***

Delays in the implemented programmes create a risk of unsuccessful implementation of the activities on time. This risk can be mitigated by stricter and targeted management of the next phase of the programmes, predesigned and strict monitoring of the updated schedules for the implementation of programmes and projects. The delays also apply to bilateral activities, which were postponed in 2020 due to the COVID 19 pandemic but could be organized online while travel restrictions still exist.

The postponement of international travel and contacts also creates a risk of not achieving the expected results of bilateral activities and failure to establish a sufficient number of bilateral partnerships. With the help of programme partners from donor countries, programme operators can mitigate this risk by organizing bilateral relations events, including in an online environment.

**In the context of rapid and sometimes radical changes in the socio-economic context, it would be feasible to optimize the operational procedures in case changes and/or updates of programmes are necessary**. It would be advisable to speed up the procedures related to the discussion and approval of amendments. It is necessary to strictly observe the deadlines approved in the MCS at the national level and in the regulations. Within these deadlines the NFP, the Cooperation Committee and the FM Office must discuss and give their opinion on the proposals made by the POs for change/update of specific interventions. The period between the development of the Guidelines for Applicants and their publication is sometimes too long, which creates problems in planning (including financial planning, which is associated with the payment of advances to beneficiaries) and the implementation of projects.

***Communication risks***

The COVID-19 pandemic is a significant challenge for communication and publicity at all levels of implementation of programmes and projects supported by the EEA FM and NFM 2014-2021. In the conditions of the epidemic, the planned events are either postponed or conducted in a virtual environment. Mixed events with a limited number of participants and video broadcasting have also been conducted via Facebook and/or other platforms such as Zoom. Attracting media interest to virtual events is more difficult, as it is a new environment for journalists as well. Despite the limitations, regular meetings of the communication group are held to discuss future steps, lessons learned and good practices. The group is an important tool to ensure that horizontal messages are communicated to the target groups and provide adequate visibility for the use of EEA and Norwegian grants.

## 4.5 Roma focus of the implemented programmes

The social and economic inclusion of the Roma is a priority of the EEA FM and the NFM in the current programming period as they support the Bulgarian government in the implementation of its National Strategy for Roma Integration. Specific concern for the Roma focus of the EEA and NFM FM and the improvement of the situation of the Roma population is expressed in the Memorandum of Understanding. The total amount of funds allocated for measures affecting the Roma population is EUR 18 048 416, which corresponds to 14% of the total budget of the EEA FM and NFM programmes.

**The NFP and the programme operators aim at coordination and synergies between the various EEA and NFM 2 programmes related to Roma inclusion for the period 2014-2021 by involving in the consultation process all stakeholders involved in the social inclusion and empowerment of Roma at national level and European level**. The NFP has established very good cooperation with various representatives of the Roma civil society, who perceive its activity as effectively aimed at social inclusion and empowerment of the Roma. Roma NGOs have actively participated in the stakeholder consultations on Roma-focused programmes organized by the NFP in May 2017. The proposals made by Roma NGOs for specific measures are also reflected in the concepts of the respective programmes, and in some cases, they have been fully incorporated (for example in the Justice programme). Based on the signed programme agreements, the NFP has developed and submitted a Roma Inclusion Plan at the national level, which has been approved by the FMO.

At the same time, based on the experience with the EU structural funds, it can be assumed that the presence of a Roma NGOs as partners in the implemented projects is not always a guarantee for the active participation of the Roma communities. For partners it is important to be able to mobilize their effective involvement in all activities and to contribute to the achievement of project objectives. There are some good practices and initiatives related to community-based structures that can be explored and implemented. Examples of this are the self-help groups of Roma women in the most marginalized Roma neighbourhoods (supported by the association of more than 150 Roma health mediators); setting up civic development committees that mobilize the participation of community members, communicate their needs and concerns to the authorities and seek solutions; establishing community action groups to facilitate the planning of Roma participation based on people's real needs and project development (ROMACT) and others.

**Some aspects of the socio-political context in Bulgaria may negatively affect the effectiveness of the implementation of the national policy framework for Roma inclusion and the achievement of the goal of social inclusion and empowerment of Roma**. The Roma issue is largely politicized, and anti-Roma sentiments are generated, especially in election situations, which sometimes leads to protests and ethnic hate crime in various settlements. The public debate is increasingly dominated by proposals for the "integration" of the Roma through strict administrative and penal approaches, which fosters a negative public opinion towards the Roma.

A serious challenge is the future of the National Strategy of the Republic of Bulgaria for Roma Integration 2012-2020 (NSRBRI), which expires in 2020. The consultation process for the development of a new strategy began in 2019, but there is a risk of repetition of the case of non-adoption of the Strategy for the Rights of the Child. Another problem is the capacity of the National Council for Cooperation on Ethnic and Integration Issues (NCCEII) to politically coordinate of its development and implementation, which is one of the principal tasks of the NSRBIR. In 2013, after the proposals for reforms were not accepted, Roma NGOs, participating as an advisory body to the NCCEII, left and in practice NSRBRI has not been convened for years. In order to overcome the lack of capacity for coordination and monitoring of policies, it has been proposed to create a discussion platform with Roma NGOs. A condition for this is that all Roma NGOs reach consensus on who should participate in the platform. The failure of Roma civil society organizations to meet this condition has led to the failure of its establishment.

**The NFP has made efforts to compensate for deficits in the** NCCEII **capacity for effective policy coordination by maintaining regular contacts with representatives of active Roma NGOs**, as well as by initiating meetings between experts from the various state institutions responsible for implementing the Roma inclusion programmes, supported by various financial instruments (e.g., ESIF and the Swiss Agency for Development and Cooperation). A good example of involving representatives of the Roma community in the consultation process for the development of programmes within the EEA FM and NFM has been the Round Table organized in December 2019 by the NFP in partnership with OFM: “Measures for Roma Integration under the EEA FM and NFM 2014-2021 - implementation challenges, monitoring strategies, active inclusion and empowerment of Roma - exchange of experience and good practices ". It involved more than 120 representatives of key stakeholders involved in the Roma inclusion at national and European level.

**The identified problems in the political and social context are a challenge for all programmes aimed at social inclusion and empowerment of Roma**. Programme and project teams have good professional skills to ensure effective management of financial instruments, but knowledge of approaches to Roma inclusion and achieving significant and sustainable results is still insufficient. This requires an increase in the capacity for effective programmeming and project management in the field of social inclusion and empowerment of Roma through training, exchange of experience with other countries and establishment of advisory groups of experts with the participation of Roma representatives.

**The existing negative stereotypes towards the Roma both in Bulgarian society and among some institutions represent a risk for the achievement of the goals for the inclusion and empowerment of the Roma**. A certain level of restraint is observed when discussing the issues of Roma participation in the design and implementation of projects, and their role is perceived primarily as beneficiaries of the implemented programmes and projects. The skepticism of the institutions towards introducing a Roma focus in the implemented programmes is also revealed in the claims that the Roma are a very sensitive issue, not only the Roma are vulnerable and there are many other groups of the Bulgarian population who are equally excluded and poor, that measures should address not only the Roma, but all vulnerable groups. The lack of understanding of the necessary participation of Roma not only as passive beneficiaries, but also as equal partners in the development and implementation of various projects with a Roma focus, is a serious risk to achieve the goals of empowerment and inclusion of Roma in society.

## 4.6 Publicity for the implementation of the programmes

In accordance with the Communication Strategy, actions have been taken to ensure publicity for the implementation of the programmes and projects financed under the EEA FM and NFM 2014-2021:

* A contract for daily media monitoring of the print and electronic media was signed regarding the grants provided by the FM to the EEA and the NFM.
* A contract was signed for the production of advertising materials for programmes and projects financed by the EEA FM and the NFM.
* A concept has been developed for organizing a visit of journalists and covering the activities of projects supported by the EEA FM and the NFM (postponed due to the COVID-19 pandemic).
* More than 1300 followers have been registered on the Facebook page with up to 1347 site visitors on specific days; up to 34 reactions to specific posts; average coverage of Facebook posts amounts to about 500 people; more than 90 posts have been made (about one post in 4 days) and more than 20 shared events have been posted.
* More than 150 publications on the site of the EEA FM and NFM (http://www.eeagrants.bg) with nearly 7,000 page views.

**Online media express significant interest in projects supported by the EEA FM and the NFM, but information about them rarely reaches print media**. Two key actors stand out, as effective promoters of the activities of the EEA FM and the NFM - non-governmental organizations and municipalities. The former are usually part of well-developed social networks, among which information about projects, news and events is widely shared and reaches a large audience. At the regional level, municipalities are good at promoting local projects and their impact on society is substantial. There are opportunities for more active involvement of cultural organizations and private companies in the communication campaigns of the EEA FM and the NFM.

## 4.7 Problems and good practices in the management and implementation of the programmes

***Problems***

Some **problems and operational risks** have been identified in connection with the management of the implemented programmes:

* Withdrawal of some pre-defined projects due to organizational and administrative problems of their promoters, failure to take into account the views of key stakeholders and public attitudes.
* There are also some problems related to the identification of donor project partners within a reasonable period of time (e.g., in the *Environmental Protection and Climate Change* Programme) and the introduction of new donor project partners in the already agreed terms of the pre-defined projects (for example in the *Home affairs* Programme).
* For the DPP of the *Home affairs* Programme (Norwegian Police Directorate), it is a problem that in the development phase of the projects, the costs for their preparation are not eligible. It is noted that DPP representatives from the Norwegian Police Directorate must sign personal declarations and submit CVs when entering into a partnership with Bulgarian institutions. Such a requirement does not exist in any other beneficiary country of the EEA FM and the NFM in which they participate.
* The Norwegian Association of Local and Regional Authorities has identified some problems in the management of the *Local development, poverty reduction and improved involvement of vulnerable groups* Programme: First, delayed procedures in launching calls for proposals, each of which is progressive, not synchronized. Calls are developed with specific rules for each pre-defined project, which is unnecessary and causes delays. Second, the terms of reference for the evaluators in the selection of project proposals focus more on the technical than on the quality criteria. The evaluators could not explain their arguments to the selection committees, which caused delays and concerns about the transparency of the process. Third, there are some problems with the measurement of some indicators (for example, in the GALOP project), as obtaining information about their values implies significant financial costs that are not planned in the project budget. Discussions are under way to address this issue, because if some of the indicators are difficult to measure, it is not clear whether they have really been achieved.

***Good practices***

In the course of the mid-term evaluation, **several good practices in the management and implementation of the evaluated programmes** were identified:

**First, the four projects related to the upgrading and development of youth centers in Plovdiv, Stara Zagora, Dobrich and Vratsa, created in the previous programming period, can definitely be defined as good practice, creating a sustainable model that can be replicated in other municipalities**. The Youth Centres in Plovdiv and Stara Zagora have been awarded a special "Quality Label" by the Council of Europe, which guarantees that the youth centres operate in accordance with the high standards of the Council of Europe and its values, and are part of a wider international network, which encourages activities in five specific areas - education, social activities, youth development, knowledge and innovation, exchange of experience and cooperation across countries. Several conditions and prerequisites can be identified for the transformation of these projects into a good practice and a successful model for youth work:

* **Effective cooperation and commitment on behalf of all stakeholders**. There is a clear political will and support (including financial) of local authorities for the implementation of projects for the establishment and development of youth centres. It is complemented by suitable recruitment in the formation of their teams, which work with full dedication, constantly increase their capacity and are dedicated to the effective implementation of projects and achieving their goals.
* **Use of good international practices and application of high standards, which in this case are proposed by the Council of Europe**. Its representatives actively participate in the activities of the youth centres by offering trainings, mentoring, consultations, joint initiatives, exchange of experience, etc.
* **Active involvement and empowerment of young people not only as project beneficiaries, but also active participants in the planning and implementation of youth centres** such as youth workers, mediators, trainers, community leaders, influencers, volunteers and others. Emphasis is placed not so much on individual and ad-hoc activities, but on lasting and complex youth initiatives, which are oriented towards achieving long-term effects and building a sustainable capacity to work with young people.
* **Participation in a national and international network of youth centres, which provide wide opportunities for exchange of experience and joint initiatives**. These networks are constantly expanding to include new youth centres that can utilize the experience of existing ones.
* **Opportunity to replicate the tested good practices and sustainable models for the work of the youth centres**. Proof of this is the successfully conducted procedure for recruitment, evaluation and selection of project proposals for the establishment of four new youth centres.
* There are conditions for ensuring the **sustainability of projects** through consequent municipal funding and self-financing.

**Second, opportunities have been created for developing and upgrading implemented projects in both the previous and the current programming period**. There are prerequisites and expressed readiness to ensure sustainability by subsequent provision of funding from the state budget, municipalities and own funds. For some projects co-financing from various national and international sources has been identified. **Another good practice is that of the project "Rehabilitation centre for children with oncohaematological diseases", implemented by the Municipality of Kostinbrod**. Its infrastructure was built under another project (under measure 7.2. "Investments in the creation, improvement or expansion of all types of small-scale infrastructure", under measure 7 "Basic services and renewal of rural villages" of the Rural Areas Development Programme 2014 - 2020), but the provided service is financed under the programme by the EEA FM. This pilot project is expected to receive funding from the state through a delegated budget.

**A good example of achieving a synergy effect is the project "Innovative models of community care for people with chronic diseases and permanent disabilities", implemented by the Bulgarian Red Cross**. The applied model of community care was initially tested by the Bulgarian Red Cross under the project "Home care for independent and dignified life", funded by the Swiss Agency for Development and Cooperation in partnership with the Ministry of Health and the Ministry of Labour and Social Policy. This approach has also been adopted by the ESIF in the framework of the programme “Patronage Care for the Elderly and People with Disabilities”. The provision of national funding can ensure the sustainability of the community care services for people with chronic diseases and permanent disabilities provided by the Bulgarian Red Cross.

**A good practice is also the effort to continue the digitalization of cultural sites and cultural heritage sites**, which started in the previous programming period under the BG08 programme "Cultural Heritage and Contemporary Art". It supports eight such projects, which can now be upgraded.

**Third, programmes funded by the EEA FM and the NFM, with the exception of those managed centrally by the EEA OFM, are implemented either in cooperation with partner organizations from donor countries and/or with international partner organizations (Council of Europe)**. All programmes have a good strategic and operational partnership with partner organizations from donor countries and international partner organizations. DPPs participate in all meetings of the Cooperation Committee and provide assistance mainly in the implementation of pre-defined projects, signing of partnership agreements, negotiating the participation of partners and the distribution of financial resources between them, providing opinions and comments on the draft Guidelines for applicants for Open Procedures and Small Grant Schemes launched during the period. DPPs also encourage participation in international networks in the field of correctional services, domestic violence and gender-based violence, which is an opportunity for Bulgarian organizations to cooperate and exchange experiences with organizations from other beneficiary countries. A good example is the Norwegian National Association of Local and Regional Authorities, which is a partner in several pre-defined projects in various programmes and has significant experience in working with municipalities. NAMRB is satisfied with the cooperation in the implementation of their joint project "Growth by activating local potential (GALOP)".

**Sustainability of the international partnership has been established**. The Council of Europe has been an international partner in the previous programming period and has been particularly useful in the areas of administrative capacity building and Roma inclusion in the *Justice* and *Local development, poverty reduction and enhanced vulnerable groups* programmes. At project level, the Council of Europe ensures compliance with its standards, the recommendations of the supervisory authorities, human rights and rule of law standards, as well as compliance with the case law of the European Court of Human Rights. The specific contribution of the Council of Europe covers various activities: nominating its experts for the training of lawyers in the field of domestic violence and gender-based violence; organizing the recruitment for long-term secondment of Bulgarian magistrates to the European Court of Human Rights; contribution to the revised project idea for improving the capacity of the Bulgarian institutions in the recovery and management of assets acquired through criminal activity under the *Home affairs* Programme; significant participation in the preparation of the calls for proposals for the continuation of old (previous) activities and the establishment of new youth centres, as well as a key role in the meetings of the commission for evaluation and selection of the submitted proposals.

**As a result of the meetings for networking and exchange of experience, supported at national or programme level conducted in 2019, a significant number of project applications in cooperation with donor country partners were submitted** - 88 projects out of 107 applications submitted in the call for municipal infrastructure of the *Renewable energy, energy efficiency and energy security* programme; 61 projects out of 114 under the *Cultural entrepreneurship, heritage and cooperation* Programme; 11 projects out of 12 applications for the establishment of youth centres under the *Local development, poverty reduction and improved inclusion of vulnerable groups* Programme. Since March 2020 however, travel and meeting support schemes have been stopped, limiting opportunities for bilateral relations to develop. Communication continues through online meetings and regular exchange of correspondence and updating the status of programmes.

## **B. Conclusions and recommendations (by programmes)**

1. ***Local Development, Poverty Reduction and Enhanced Inclusion of Vulnerable Groups* Programme**

**Overall, the objectives of the programme can be assessed as adequate to the needs and problems of its target groups.** The objectives and priorities of the programme are formulated through a process of intensive consultation with national and international governmental and non-governmental organizations as stakeholders. The results of the discussions have been taken into account in the development of the concept of the *Local development, poverty reduction and enhanced inclusion of vulnerable groups* Programme. The experience from the implementation of the programmes and projects supported by the Financial Mechanism of the European Economic Area and the Norwegian Financial Mechanism (EEA FM and NFM) in the period 2009-2014 has also been taken into account. **The planned programme initiatives are aimed at interventions, which at this stage can be assessed as appropriate, effective, realistic and traceable in terms of the objectives of the EEA FM and the NFM**. They are adequate to the needs and priorities of Bulgaria in the current programming period and largely correspond to the problems and needs of the target groups of the programme.

The donor programme partner (DPP) – Norwegian Association of Local and Regional Authorities, considers the way in which the programme areas for local development (PA 10), inclusion and empowerment of the Roma (PA 07) and children and youth at risk (PA 08) are combined to be to the detriment of a fully systematic and comprehensive approach to local development, since the focus is usually on measures to support disadvantaged groups and not on dynamic development of local communities. If local development is the main focus of the Programme, there could be more integrated measures in this area.

Four pre-defined projects are being implemented within the programme. **Their progress so far is satisfactory, and their activities meet the needs of the target groups**. Restrictions caused by the pandemic emergency situation have led to some changes in the schedule or manner of implementation of the activities of the contracted projects, to the postponement of calls for proposals, extension of the deadlines for submission of applications and evaluation procedures.

**The *Local development, poverty reduction and enhanced inclusion of vulnerable groups* Programme creates added value by developing and implementing innovative models and tools based on a systematic approach to sustainable local development, poverty reduction and the inclusion of vulnerable groups**. They are related to the development of strategies for local development, employment in local communities, development of pre-school, school and non-formal education, youth policies and activities, investment and provision of social and health services, building a system for collecting disaggregated data on vulnerable groups and others. It is also envisaged to support the municipalities to increase their administrative and expert capacity for preparation and submission of project proposals, implementation and reporting of projects funded by various national and international donor programmes.

The programme replicates and upgrades good practices and approaches implemented within the BG06 programme of the EEA FM and NFM in the period 2009-2014. Among them are the models for development of youth centres, training modules for teachers on intercultural education, training of Roma educational mediators and others. Though the launch of calls for upgrading existing and establishing new youth centres was delayed, it has been successful. These projects can be assessed as good practices and have the potential to respond effectively to the needs of target groups. At the same time, the Council of Europe has made several recommendations for the process of selecting projects for the establishment of youth centres with respect to:

* The implementation of Council of Europe standards and instruments;
* The importance of the projects for the implementation of youth policies, coordination and communication with the Ministry of Youth and Sports;
* The real and active participation of young people and youth NGOs in the projects;
* Innovative measures (attractive to young people) and ensuring horizontal principles such as gender equality;
* The relevance of the national network of youth centres.

Given that these aspects are directly related to the capacity of youth centres to contribute to the objectives of the social inclusion programme, it is crucial to regularly monitor the implementation of youth centre projects, taking into account these quality criteria.

**The Norwegian Association of Local and Regional Authorities has registered some delays in the procedures for announcing calls for project proposals**, each of which developed in a chronological rather than in a synchronized manner. Calls are developed with specific rules for each pre-defined project, which is unnecessary and causes delays. It would be an advantage, if the process of creating rules and regulations for pre-defined projects is optimized.

Despite the attempts to modify the problematic pre-defined projects (PDP 4 *Pre-Feasibility Study for a National Paediatric Hospital in Bulgaria*, contracted by the Ministry of Healthcare and PDP 5 *Capacity Building for Inclusion in Bulgaria* (INCLUDE), with contractor the Council of Europe) there is a real risk of failure to achieve the goals to which they are aimed and respectively the initially defined indicators, if their updating and restarting is not accelerated.

With the exception of these problematic projects, **in general, the implementation of the *Local development, poverty reduction and enhanced inclusion of vulnerable groups* Programme is carried out at a relatively good pace with some delays in certain projects and procedures, which at this stage do not jeopardize the implementation of objectives and achieving the expected results**.

**The effectiveness and efficiency of the implemented interventions will be more distinct once the implementation of the programme reaches a more advanced stage**. It is important that the PO contributes to their effectiveness and efficiency through careful monitoring; close and regular consultations with various stakeholders, governmental and non-governmental organizations in the relevant fields; transparent and regular communication with the partners in the Programme, learning lessons from previous and current programmes implemented in Bulgaria; sharing experience with other EEA FM and NFM grant programmes; implementation of European standards and integration of European best practices. Very important in this context is the development of the pre-defined project, which would replace the INCLUDE project withdrawn by the Council of Europe. This would contribute to capacity building of various project promoters to effectively implement programme activities. To date, the PO has only presented a conceptual framework for such a project, and a full proposal is to be submitted. Two key calls for project proposals are to be launched (“Integrated measures in support of Roma inclusion” and “Improvement of the conditions for education and care of children from three to six years”).

**The amount of financial assistance provided under the EEA FM and the NFM can be assessed as significant, corresponding to the pre-set programme objectives and the needs of the target groups**. This assistance complements the existing external funding provided primarily by the European Structural and Investment Fund (ESIF 2014-2020) through the EU operational programmes "Science and education for smart growth", "Human resources development", "Regions in growth", "Rural development". The funding through the Bulgarian-Swiss Cooperation Programme in the total amount of 76 million Swiss francs in priority areas for the country (including the inclusion of vulnerable groups) is also taken into consideration.

Building on its experience in selection of project proposals and in its capacity of a voting member of evaluation committees, the DPP (Norwegian Association of Local and Regional Authorities) has identified some **areas in need of improvement** and informed the PO and other programme partners accordingly. These areas cover:

* Development of project evaluation criteria in a more well-defined way and with greater compliance with the objectives of the call, so that project quality and content, their objectives for social inclusion, as well as their financial and administrative capacity can be assessed.
* Appointment of national evaluators with proven experience in the thematic area of the call and with a diverse profile.
* Close involvement of relevant governmental stakeholders in the design of the call for proposals and in the selection process.
* Ensuring that the evaluations elaborated by the national evaluators provide a clear assessment of the strengths and weaknesses of the projects and clear reasons for their selection.
* Sharing documents with the members of the selection committee as early as possible before the meeting of the selection committee, but not later than two weeks before the meeting.
* Preparation of an accurate written record of the meeting of the selection committee and providing guarantees that all members of the committee have the opportunity to comment, modify and agree on its final version.

In relation to the **identified risks regarding the Roma focus** of the programme and the Roma inclusion activities (political sensitivity of the topic, the complexity of the existing problems, the capacity to develop quality project proposals and implement the planned activities that some project promoters still need to develop, etc.), the PO and programme partners need to monitor this part of the Programme very closely in order to address challenges and ensure that Roma inclusion goals are met.

**The DPP (the Norwegian Association of Local and Regional Authorities) has made two recommendations**: First, the active participation of all stakeholders and full transparency during the development of open calls for project proposals in order to ensure that they are relevant and are based on an in-depth assessment of the needs of the target groups. Second, the PO should take into account the qualitative aspects of the various interventions, insofar as they contribute to achieving the objectives of the social inclusion programme. Programme partners and external experts in relevant areas can contribute to this process.

**Communicating information should guarantee that all programme partners are informed fully and in а timely manner of all relevant programme aspects, during and between meetings of the Cooperation Committee**. All information about the national context – new legislation, new strategic priorities, new external funding provided to programme partners must be accurate and up to date (it is important to keep in mind that this information is often only available in Bulgarian and therefore the DPPs rely entirely on the PO to make it accessible). It is important to provide feedback to DPPs on documents shared with them for comments and suggestions, as well as to share final versions of documents approved by all partners.

1. ***Renewable Energy, Energy Efficiency and Energy Security* Programme**

The *Renewable energy, energy efficiency, energy security* Programme is aimed at increasing the production of energy from renewable sources, improving energy efficiency, and increasing the expertise in the field of renewable energy, energy efficiency and energy management, reducing carbon intensity and increasing the security of deliveries**. Its goals are assessed as realistic, achievable, adequate to the problems and needs of the target groups and in accordance with the EU regulatory framework, as well as with Bulgaria's national priorities in the field of energy and climate change.**

The Programme has been elaborated within a broad stakeholder consultation process, which includes representatives of municipalities, associations and otganizations representing the Bulgarian industry, organizations working in the field of energy efficiency, renewable sources, environmental protection and biodiversity, scientific and government institutions. It is projected that its goals will be attained by achieving three key outcomes:

* Outcome 1: Increased renewable energy production.
* Outcome 2: Improved energy efficiency in buildings, industry and municipalities.
* Outcome 3: Strengthened expert capacity for renewable energy, energy efficiency and energy management.

**In the period of the mid-term evaluation (i.e. until June 30, 2020), moderate progress has been made in the implementation of the programme**. Two calls for project proposals have been launched: first, the pre-defined project "Feasibility study on utilising the hydro power potential in existing water supply systems and upgrading potential for existing small hydro power plants "; second, an open call "Rehabilitation and modernization of municipal infrastructure - systems for outdoor lighting of municipalities", under which 107 project proposals, 88 of which in partnership with Norwegian organizations.

**A general delay in the implementation of the programme has been registered**, caused by the long period of establishment of its management and operational structure, as well as delays in announcing calls for project proposals. The PO is working to bridge this gap, but some internal procedures of the Ministry of Energy continue to affect the overall effectiveness of the programme. According to the DPP, its implementation needs to be accelerated. The PO also noted the existing delays in the implementation of the programme, which, however, do not jeopardize the achievement of its objectives and outcomes. No significant problems related to the programme management have been identified. The PO has significant experience and is well trained to deal with operational problems.

**Due to the delays in the implementation of projects and measures under the *Renewable energy, energy efficiency, energy security* Programme, it is not possible to make an objective assessment of its efficiency and effectiveness.** The PO evaluates the planned interventions under the programme as effective and efficient. The available financial resources under the EEA FM and the NFM are generally assessed as sufficient to achieve the objectives and priorities of the programme, the point being shared by both the PO and the DPP. For the activities related to the efficient use of hydropower potential and geothermal energy, financial support is also identified as sufficient. More money can be spent on energy efficiency in buildings, street lighting and industry. A procedure has been launched to redirect funds from small grant schemes to funding of 3-4 additional projects for rehabilitation and modernization of street lighting. Under this call a number of really good project proposal have been submitted and the differences in the quality of selected projects and reserves was really small.

Cooperation with both the Norwegian in the programme (Ministry of Oil and Energy of the Kingdom of Norway, Norwegian for Water Resources and Energy Directorate) and with the Icelandic partner (National Energy Authority of Iceland) is assessed as excellent. A 10-day preliminary visit to Norway turned out very rewarding. In May 2019, a conference was held, which was attended by many potential partners from Norway and Iceland. Due to the pandemic situation in 2020, scheduled events and visits have been cancelled and replaced by a number of online meetings. **According to the DPPs under the *Renewable energy, energy efficiency, energy security* Programme, the cooperation with the PO and the NFP is very good.**

In view of the identified delays in the implementation of the programme, it is necessary to take action to overcome them, including the improvement of the internal procedures of the Ministry of Energy, which affect the overall effectiveness of the programme. The commitment of the employees of the Ministry of Energy to other tasks and projects should be considered and their tasks should be prioritized. Due to the delay in the implementation of the *Renewable energy, energy efficiency, energy security* Programme, it is currently not possible to make a comprehensive and objective assessment of its efficiency and effectiveness. However, the Programme has the resources to build on what has been achieved in the previous programming period and to achieve its objectives and expected results.

1. ***Environmental Protection and Climate Change* Programme**

The main goal of the *Environmental protection and climate change* Programme is to improve the state of the environment and reduce the adverse effects of pollution and other human activities. **The programme can be assessed as innovative, realistic, feasible and in line with European priorities in the field of environment protection and climate**. It is implemented in accordance with the main international and national strategic and legal documents in the field of environment protection. The objectives and priorities of the programme are defined through a process of intensive consultation with various stakeholders - national and international governmental and non-governmental organizations. **In general, the objectives of the *Environmental protection and climate change* Programme are adequate to the needs and problems of its target groups, and there is no need to change or supplement them.**

The design of the programme allows to achieve sustainability of the implemented projects. The latter contain elements of flexibility and possibility for adaptation and updating of the implemented activities. The indicators in the Programme Agreement have been transferred to the project level. They are appropriate, clear, measurable and allow for monitoring the implementation of the objectives of the entire programme and there are no proposals for changes.

According to the PO, all activities (interventions) in the programme are appropriate. **There is a high activity of the municipalities in preparing projects under the programme, and this exceeds the initial expectations**. The intensification of public speaking about the importance of the implementation of climate policies has also had a positive impact. A good example is the small grant scheme "Marine waste reduction measures". The municipalities show a strong interest in it, and the call received very good project proposals - there are six approved innovative projects with significant and measurable results. Beneficiaries are very ambitious in terms of the quality of project proposals. Most of them develop wide-ranging project proposals aimed at maximum funding, which is a serious challenge for the PO, as financial resources are limited, and interest is very high. The PO notes that if it has more resources, more projects could be supported.

**The importance of school-based grant schemes can be assessed as very significant**. They are seen as a sustainable investment in environmental education. These projects are sustainable and create educational traditions, form knowledge and competencies of teachers in the field of environmental issues. It should be borne in mind that schools have delegated budgets and cannot afford to finance activities in environmental education.

The synergy with other financial instruments and their outcomes is also sought at the level of programming with the operational programme "Environment", the „Rural development“programme, as well as with the *Renewable energy, energy efficiency and security* programme within the EEA FM. Coordination with the goals and initiatives of the Recovery and Sustainability Plan has also been carried out. The results of the previous programming period are being upgraded to the current one, and the new element is the focus on climate, which in the next programming period should be continued and upgraded.

By the end of the evaluation period (June 30, 2020), the PO announced calls for project proposals for two pre-defined projects, three open calls and four small grant schemes. **Despite some delays, as of June 30, 2021, the *Environmental protection and climate change* Programme on the whole is being implemented without significant delays, which could be assessed as a risk for achieving its goals**. The indicators for evaluation of the progress and the results of the programme are quantifiable and are set in the programming stage. They are relevant, reliable, specific and there are no proposals to change them. The PO is convinced that the programme will be implemented on time and that the outcomes will meet the objectives. The results are expected to be sustainable, linked to European objectives as well as with other financial mechanisms.

The summary information on the progress made under the programme shows that, in terms of the measures launched, it is at a relatively advanced stage. It should be noted that the programme covers the largest number of open calls and small grant schemes (together with the *Renewable energy, energy efficiency and security* Programme). **The planned interventions at this stage can be assessed as appropriate, effective, realistic, and traceable. They are adequate to the needs and priorities of Bulgaria in the programming period and largely correspond to the problems and needs of the target groups of the programme.**

**No notable difficulties have been identified with programme management**. The PO team has significant experience and is well trained to deal with operational problems, taking into account the "lessons" from the previous programming period. The PO analyses the training needs of both existing and new employees and provides appropriate capacity building measures. Continuing education is also provided, which is oriented towards ongoing changes in the socio-economic context, in the legal framework and the institutional framework, in the management and control procedures.

**The work and cooperation with foreign and national partners of the programme is assessed as very good**, as is the communication with the partner from the donor country - the Norwegian Environment Agency.

1. ***Cultural Entrepreneurship, Heritage and Cooperation* Programme**

The *Cultural entrepreneurship, heritage and cooperation* Programme is the only external specific financial instrument aimed at solving important and topical problems in the field of culture. The programme has been developed in accordance with the national and European strategic and programme documents in the field of culture, taking into account the experience of the previous programming period (Programme BG08 "Cultural Heritage and Contemporary Art" from FM 2009-2014).

**The goals, priorities, eligible project activities and approaches set in the macro framework of the programme correspond to the needs, problems and limitations of the main target groups of the programme**. They have been derived in a process of consultation and coordination with stakeholders, incl. potential beneficiaries of the programme. Significant interest in the programme from various stakeholders and potential beneficiaries is indicative of that process. Currently, there is no need to supplement or change the goals and activities of the programme. However, given the long delay in the implementation of the programme to date and the continuing delays, the DPP (Arts Council – Norway) recommends more flexibility in activities and a change in the Programme agreement, if it is considered that other types of interventions would be more effective or more efficient.

No links have been identified with the only structure in Bulgaria that finances initiatives in the field of culture (National Culture Fund). As there are no other programmes and mechanisms in place in Bulgaria in this area, complementarity or coordination with other programmes and tools cannot be discussed. **As no projects under the *Cultural entrepreneurship, heritage and cooperation*** **Programme have been launched during the evaluation period, and the first projects are just at the start of implementation, no synergies with other FM programmes and measures can be established, although some opportunities are emerging**.

For the evaluation period, two calls have been announced under the *Cultural entrepreneurship, heritage and cooperation* Programme. The first one is from December 2018 and is designed to support study visits under the Travel support scheme within the Bilateral relations fund, which, however, is beyond the focus of the mid-term evaluation. Until March 2020, when the consideration of applications for study visits was temporarily suspended due to the epidemiological situation, the PO approved a total of 40 study visits of cultural operators from Bulgaria and donor countries respectively to donor countries and Bulgaria. Due to the development of the Covid-19 situation, the acceptance of applications has not resumed during the period of the evaluation.

In September 2019, the PO announced the first call for applications with projects under Outcome 2 "Improved access to culture and arts" with a deadline of January 10, 2020. Altogether 114 project proposals were submitted under this call. In May, the procedures for administrative compliance and eligibility were completed, and the 53 submitted project proposals advanced to the stage of technical and financial evaluation. In early December 2020, 10 selected projects and 37 reserves have been announced. The contracts with the selected projects are expected to be signed in early 2021.

**As of the final date of the mid-term evaluation (June 30, 2020), there are no projects that have reached the actual implementation phase**. Although the Programme Agreement was signed earlier than the agreements with all cultural programmes from other beneficiary countries under the EEA FM and NFM, the latter are more advanced in their implementation compared to the Bulgarian *Cultural entrepreneurship, heritage and cooperation* Programme. There is a delay in relation to the initially adopted schedule for the implementation of the Programme. Furthermore, non-compliance with the updated schedule is also registered. This applies in particular to activities to improve the social inclusion of the Roma and to raise awareness of the arts and culture of ethnic minorities. There was a delay in the opening of the calls for project proposals and a delay in the selection procedures for the only open call within the programme. As a result of the disrupted schedule (due not least to the Covid-19 pandemic situation), restructuring and changes in the programme were carried out: first, in the number of calls under Outcome 3, where the two originally planned calls have been combined into one; second, options for remote or digital cultural events have been introduced in the application guidelines. The overall pace of implementation of the programme is slow, and the delays are compensated by reducing the project deadlines from 36 to 24 months, which may negatively affect the sustainability of some of the programme outcomes (especially those related to audience development and inclusion and improvement of the situation of the Roma).

**The main problems in the management of the programme are the changes in the team of the PO and the delayed deadlines for the implementation of the programme**. Restrictions related to Covid-19 and the epidemiological situation also pose a serious problem in the implementation of the programme. In the field of culture, many of the activities cannot be carried out remotely and in conditions of social isolation. Especially with regard to the Roma focus, the social inclusion of the Roma through activating their access to culture and their inclusion in the presentation of the Roma culture presupposes effective presence, participation, and inclusion.

**A good practice** is to continue the digitalization of cultural sites and cultural heritage sites, which started in the previous programming period under the BG08 programme "Cultural Heritage and Contemporary Art". It supported eight such projects, which can now be upgraded.

Several **recommendations** can be made to improve the management and implementation of the programme. First, to seek coordination of activities with the *Local development, poverty reduction and improved involvement of vulnerable groups* Programme in contacts and work with representatives of Roma organizations in the preparation and participation in project proposals, as well as interaction with existing youth centres that actively work with disadvantaged groups, incl. Roma. Second, in order to ensure the submission of quality project proposals under the SGS, the PO can organize consultations and advice to potential applicants in the process of developing project proposals.

It is recommended that, together with the DPP (the Arts Council – Norway), additional good practices and working models for intercultural integration and inclusion of disadvantaged groups to be sought. The Arts Council notes that it is the only DPP under this programme, which is unusual, as the Norwegian Directorate of Cultural Heritage usually participates as a partner in the cultural heritage part of the EEA FM programmes. In this sense, a recommendation can be made to make proposals for cooperation to other organizations from donor countries, given their different (in terms of objectives and activities of the programme) expertise and focus.

Given the significant overall delay in the implementation of the programme, there is a risk of not achieving the programme objectives and expected results. According to the PO, the announcement of the forthcoming four calls for project proposals is expected to achieve the target values of the indicators for evaluation of the implementation of the programme. However, it may be advisable to pay particular attention to and closely monitor the progress of Roma-focused projects, where the objectives of promoting social cohesion and improving mutual understanding between majority and minority cultures involve long-term interventions and activities.

An alternative to dealing with the overall delay in the programme is offered by the Arts Council in Norway. According to the DPP, it is appropriate to reallocate funds from Outcome 1 to Outcome 2 in order to ensure their use within the programme. The arguments for this proposal are:

* First, the projects under Outcome 2 have a shorter implementation period (1-2 years), and the funds can be added to the second call under Outcome 2, which is forthcoming.
* Second, this redirection of funds would increase the results of the programme (in terms of efficiency and effectiveness).
* Third, this would also strengthen bilateral relations, as the first call invited a number of good projects proposals, including proposals for bilateral partnerships, and they could be funded in the second forthcoming call. It should be noted that the PO has already prepared a proposal to the NFP for funding applicants from the reserve list of projects under the First Call.

However, these DPP’s recommendations need to be seen in the light of the explicitly stated commitment of the Arts Council in Norway, in particular with regard to Outcome 2 of the Programme. At the same time, the Arts Council admits that it cannot contribute much to the cultural heritage part of the Programme (Outcome 1). The evaluator does not recommend the acceptance of this particular DPP’s proposal, as it may lead to financial deficiency of Outcome 1, where infrastructure costs are envisaged (revitalization and renovation of spaces for presentation of cultural heritage, creation of jobs, etc.). This would also have a negative effect on the sustainability and scope of the implemented programme.

1. ***Home Affairs* Programme**

The *Home affairs* Programme covers three programme areas and one additional line of work:

* PO 18 - Asylum and migration.
* PO 20: International police cooperation and crime prevention.
* PO 16: Good governance.
* Improving the situation of the Roma population.

**The main goal of the programme** is to increase the capacity and ability of national institutions to operate in the areas of asylum and migration, international police cooperation and the fight against crime, prevention and fight against police corruption, asset recovery system in Bulgaria and fight against economic crime. Another important goal is to increase the capacity of institutions in the field of police cooperation, including organized crime and human trafficking. Through its synergy with the Justice programme, the programme aims to strengthen the legal chain in terms of access to justice, good governance, gender-based violence and human trafficking.

**The objectives of the programme have been developed in consultation with the stakeholders and international partners of the programme and can be assessed as adequate to the needs and problems of the target groups, the employees of the Ministry of Interior and the Roma community.**

The programme is implemented through predefined projects (PDP), targeting specific groups and contributing to the achievement of its goals and expected results. **It can be assessed as relevant to the needs of the target groups, realistic and feasible.** The main reason for this is the adequate planning of the projects and the intensive consultation process with the stakeholders and partner organizations from the donor country.

The design of the programme allows for achieving the sustainability of projects, as there are opportunities for flexibility and adaptability in a dynamic national socio-economic and political context. **The defined indicators for monitoring the progress of the programme are specific, measurable, allow for monitoring the implementation of the objectives of the programme and adequate reporting of the achieved results**.

The *Home affairs* Programme corresponds to the measures implemented under other programmes and is closely related to the implementation of a number of national and international strategic and legal documents in coordination with the *Justice* Programme.

**Contracts have been concluded for the implementation of most of the PDPs under the *Home affairs* Programme (12 of the planned 14) and the implementation of projects is in the phase of initial implementation, development of documentation or starting the public procurement**. Two projects are an exception (PDP 1 and PDP 8), due to the impossibility to realize the pre-set goals and activities, as beneficiaries of the projects (State Agency for Child Protection and State Agency for National Security) have stated they do not have the possibility to implement the projects. Accordingly, the PO has proposed a modification of the projects, and the approval of the proposed changes and the signing of contracts is forthcoming.

With the exception of PDP 1 and PDP 8, the precise advance planning and design of the *Home affairs* Programme ensures its rhythmic implementation within the foreseen deadlines. **The implementation of the activities is even and no risks for their non-implementation have been identified.**

No significant problems were identified related to the conducted public procurements. The latter, especially if they are related to appeals and/or unrealistic assessment of the necessary resources for implementation, can lead to risks and delays in the implementation of projects.

The pandemic situation at this stage of the implementation of the PDP does not cause serious difficulties in their implementation, possible delays can be compensated. It is likely that if there is no change in the pandemic situation, problems will arise with the planned training and communication of larger groups of people.

The PO team has significant experience and is well trained to deal with operational problems, and the experience gained from the previous programming period also contributes to this. The management of the programme is well provided with personnel and finances. **No significant problems were identified with programme management.**

The work and cooperation with foreign and national partners of the programme is assessed as very good. Coordination meetings and information days are held periodically, which ensures a sufficiently good level of coordination with beneficiaries and donor organizations.

**The projects under the *Home affairs* Programme are in the initial phase of implementation. The concrete results of their implementation can be assessed at the earliest when the initial structuring and announcement of public procurements is completed, i.e., the phase in which most of the PDPs are currently**. At this stage, the planned interventions can be assessed as appropriate, effective and realistic. They are adequate to the needs and priorities of Bulgaria in this programming period and generally correspond to a large extent to the problems and needs of the target groups of the programme. The implementation of the PDPs under the programme will contribute to a significant improvement of the material conditions and qualification of the staff and contribute to the introduction of new practices in the activities of the Ministry of Interior in combating crime, crime investigation, violence prevention and extremism.

**In general, the amount of financial assistance provided under the NFM for the *Home affairs* Programme can be assessed as significant and consistent with the programme objectives and needs of the target groups**. For the PDPs with a Roma focus, it will probably be difficult to assess how much of the funds have been used for the needs of vulnerable groups, especially the Roma population.

The Strategic Report for the period 01.08.2019 - 31.07.2020 states that the implementation of PDP 1 and PDP 8 poses a risk to the *Home affairs* Programme, which is still manageable. PDP 1 will be transformed into an open procedure, but its implementation is problematic due to the lack of suitable places for the construction of a Centre for Unaccompanied Minors and Minors from Third Countries and resistance from local communities. PDP 8 will be transformed to include Schengen cooperation activities, which may lead to delays in the project implementation. The report also notes the insufficient capacity of some of the PDP contractors to effectively manage the public procurement process, and this is identified as a moderate risk. Corrective action in this regard is the enhanced monitoring and control of the process by the NCU and the PO. Other identified risks are insufficient administrative capacity, which could hamper the implementation of PDPs 2, 6, 7, 10, 11, 12 and 13, for which beneficiaries do not have prior experience with the implementation of NFM projects, as well to postpone visits related to the bilateral cooperation with partner organizations.

Some of the PDPs with Roma focus are aimed at increasing the capacity of police officers (PDP 9 and PDP 10), while others (PDP 11 and PDP 12) involve direct interaction of police officers and people from the Roma community. In general, many of the activities target the needs of all vulnerable groups, and it is difficult for interventions to be specifically targeted at a particular group. Among main problems in terms of the Roma focus of the programme, is that the mechanism for engaging the representatives of the Roma community to participate in the programming and implementation of projects is not completely clear. At least at this stage, the Roma community and Roma organizations, are perceived rather as beneficiaries of the programme and rarely as executors of some of the projects.

**6. *Justice* Programme**

The *Justice* programme covers two programme areas (PO 19 and PO 21). Its **objectives** are: First, to improve the quality and efficiency of the process of justice related to respect for human dignity, freedom, equality, the rule of law and respect for human rights, as well as respect for the rights of minority groups.

Second, in the field of the penitentiary system, to contribute to its modernization and reform in accordance with European standards, humanization of the implementation of various types of penalties in order to achieve the goals of their imposition, improving the rehabilitation of offenders, increasing the level of competence and motivation of staff, cooperation and the possibilities for introducing innovations in the functioning of the General Directorate for the Execution of Sentences and its territorial units.

**These goals of the programme can be assessed as adequate to the needs and problems of the target groups, as well as to the needs of the justice and penitentiary systems in the country.** The only proposal of the partner from the donor country (Directorate of the Norwegian Correctional Service - KDI) for a change in the design of the programme in future programming periods is to establish a separate programme for the correctional services sector.

Difficulties and relative delays in the implementation of the programme are encountered in the implementation of "hard" measures, involving the repair of the material base of prisons and places of detention. This includes the so-called "blue rooms", which should support the application of the principles of juvenile justice and provide adequate conditions for interrogation and protection. Despite the complex coordination procedures associated with these projects, the PO seeks to overcome emerging difficulties and reduce the risks of failing to achieve its objectives.

**Based on the assessment made in terms of the objectives, design and coordination of the Justice programme, the following conclusions can be drawn:**

* The programme has been developed in accordance with the national and European strategic and programme documents in the field of justice, taking into account the experience from the previous programming period.
* The goals, priorities and expected results set in the programme correspond to the needs, problems and limitations of the main target groups of the programme and have been derived in a process of consultation and coordination with stakeholders, incl. potential beneficiaries of the programme. There is no need to supplement or change the objectives and activities of the programme.
* There is a need to improve the links between the *Justice* and *Home Affairs* programmes, which are respectively programme operators and beneficiaries of PDP 4, which is closely linked to juvenile justice and the creation of material and human resources for its improvement. PDP 4 presupposes the launch of one of the small grant schemes. Its implementation implies enhanced institutional interaction between the PO and the Ministry of Interior.

**The analysis allows for the following conclusions about the status of the Justice programme as of June 30, 2020:**

* First, contracts have been concluded for most PDPs in the two programme areas of the programme. An exception is PDP 4, where an institutional agreement has yet to be reached with the Ministry of Interior on how to implement the project-related public procurement. The small grant schemes under the programme have not been launched, as the main reason for this is their connection with the so-called hard measures - improving the facilities in detention centres and prisons. However, according to the PO, there is a readiness for these grant schemes to be launched when the material conditions for their implementation are available.
* Second, the training, meetings and communication between legal professionals and representatives of different social groups provided for in many of the PDPs is significantly hampered by the pandemic situation. This is compensated by some of the planned activities being implemented online, but others remain unfulfilled. In this respect, additional delays are likely to accumulate on many projects. It is likely that some of the planned activities that are affected by the pandemic situation will need to be modified.
* Third, some of the so-called soft PDP measures related to the problems of vulnerable groups and especially the Roma, depend on both the accumulated delays in the implementation of the hard measures and the delays in the launch of the small grant schemes. This is particularly the case in areas such as juvenile justice, domestic violence, gender-based violence, access to justice and legal aid, and training of law enforcement officials. It will probably be necessary to assess the risks to the implementation of the PDPs of the *Justice* Programme by the end of 2021 and, if necessary, to make the necessary adjustments.

**Delays in the implementation of the *Justice* programme have been identified in several areas:**

First, in the implementation of the so-called hard measures under the various PDPs (1, 2, 4 and 6), which include repair or construction work. The delay is related to necessary changes in the technical specifications of the projects for the repair and construction of a new material base due to an inaccurate initial assessment of the assignments and/or change of the initial plans. There is also a discrepancy between the submitted offers and the preliminary expectations given the available financial resources.

The delayed implementation of construction and repair works on these projects leads to delays in projects related mainly to the so-called soft measures, especially PDPs 4, 6, 7 and 9. Many of them address vulnerable groups, children and the Roma community and, in this sense, one of the main objectives of the current programming period. In this regard, it will probably be necessary at the end of 2021. to assess possible delays and possibly take corrective action. The pandemic situation also creates difficulties in the implementation of the soft measures under many of the PDPs, as well as in the projects under the small grant schemes (after their launch).

The accumulated delay is about 6 months, but the time until the deadline for implementation of activities (2024) allows this delay to be compensated and the projects and objectives to be implemented on time. According to the PO, the necessary corrective actions (attracting experts and external evaluators) are successful and guarantee, albeit in a tighter schedule, the implementation of plans and projects.

**No significant problems were identified with programme management**. The management of the programme is well provided with staff and finances, and the PO team has significant experience from the previous programming period and is trained to deal with operational problems.

Most projects under the Justice programme are in the initial phase of implementation. **The concrete results of their implementation can be assessed only when the preliminary stage of implementation is completed - initial structuring and announcement of public procurements, i.e., the phase in which most of the PDPs are currently.** The implementation of the two small grant schemes has not started, but the PO has not yet assessed this as a risk to achieve the goals of the programme.

**The planned interventions at this stage can be assessed as appropriate and realistic**. The indicators for evaluation of the results are relevant, measurable and reliable - there are no proposals for their change. However, it is still too early to assess the level of implementation on most indicators.

**In general, the amount of financial assistance provided under the NFM under the Justice programme can be assessed as significant and in line with the set programme goals and the needs of the target groups**. The implementation of the objectives and PDPs under the programme will contribute to a significant improvement of the material conditions and qualification of the staff in the judicial system, while also contributing to the introduction of new practices in the penitentiary system of the country, corresponding to European standards.

The donor partner (Norwegian Correctional Service - KDI) is of the opinion that additional funds are needed in the project for renovation of buildings and facilities implemented by the Directorate General for the Execution of Sentences, as well as for some soft measures. Therefore, the project organizer has applied to the PO for relocation of additional funds, including available funds from other programmes, which the PPDC would support.

The **main risks identified** in this assessment by the NFP and the PO are as follows:

First, the negative attitude of local communities towards some of the measures under the programme (for example, the building of the new prison in the village of Samoranovo), as well as some measures related to domestic and gender - based violence, juvenile justice, vulnerable groups.

Second, failure to achieve indicators related to juvenile justice, if the project promoter refuses to sign the PDP 4 contract.

Third, delays in the implementation of projects involving infrastructure measures (e.g., the new pilot prison and training centre), as well as the accompanying soft measures. Delays in public procurement are also possible, incl. due to lengthy appeal procedures.

Fourth, the prolongation of the pandemic situation, the non-implementation of some of the soft PDP measures and the delay in the launch of small grant schemes.

**The *Justice* programme has a clear Roma focus**. The understanding in the construction of the PDPs is that, in principle, the needs of all vulnerable groups are addressed, both in terms of access to justice and in terms of the residence of representatives of these groups in the institutions of the penitentiary system. Opportunities for direct participation of Roma organizations is exits in small grant schemes, which provide for addressing the problems of the Roma community in the described areas, as well as the direct participation of Roma organizations as beneficiaries and project implementers. **One of the main problems from the point of view of the Roma focus at this stage of the programme is that there is no clear mechanism for engaging the representatives of the Roma community for active participation in the implementation of the projects under the programme**. The Roma community and Roma organizations are perceived rather as beneficiaries of the programme and possible implementers of some of the projects.

## **Annexes**

## **Annex 1. Case studies: main results**

1. **“Youth Centres: a powerful factor for local development”**

Special focus of the mid-term evaluation was placed on the existing four youth centres in Stara Zagora, Plovdiv, Dobrich and Vratsa. They were established in the previous programming period 2009-2014 of the EEA FM and the NFM. In the new programming period 2014-2021, within the limited call for project proposals "Youth Centres: a powerful factor for local development", started the implementation of four projects, which build on what has already been achieved:

1. "Youth Centre Plovdiv - a Powerful Factor for Local Development" (BGLD-1.003-0002). The beneficiary is the Municipality of Plovdiv, and the project is implemented in partnership with Norsensus Mediaforum, Norway and the Applied Research and Communications Foundation, Sofia. The project budget and EUR 1,050,077 (BGN 2,053,740.60).
2. "Youth Centre Stara Zagora - Think Locally, Act Globally" (BGLD-1.003-0003), promoted by the Municipality of Stara Zagora in partnership with Glemmen videregående skole, Norway. The project budget is EUR 956,635 (BGN 1,870,986.73).
3. "Youth Centre Dobrich - Your Tomorrow!" (BGLD-1.003-0001) with the beneficiary Municipality of Dobrich in partnership with Municipality of Kópavogur, Iceland; Lyuben Karavelov Secondary School, Dobrich and Peyo Yavorov Vocational School of Tourism, Dobrich. The project budget is EUR 968,967 (BGN 1,895,105.66).
4. "Youth Centre Vratsa - a Factor for the Development of the Northwest" (BGLD-1.003-0004). The beneficiary is the municipality of Vratsa in a partnership with Timis Country Youth Foundation, Romania. The project budget is EUR 811,675.00 (BGN 1,587,473.97).

The four projects are 36 months long starting on 01.07.2020. The main goal of all of the projects is to expand the territorial scope of the youth centres in Plovdiv, Stara Zagora, Dobrich and Vratsa by continuing and developing existing and conducting new and innovative activities that meet the highest standards for youth work. The aim is to increase the diversity, number and interest of the target groups involved, the main ones being children, young people up to 29, including children and young people at risk and representatives of vulnerable groups (for example, students at risk of dropping out or already dropping out of school; young people at risk, including youth from ethnic minorities; young people at risk living in small and remote settlements or in economically less developed areas). The socio-demographic scope of the target groups expands covering people who are related to the activities of the youth centres, including children, parents, teachers, mentors, mayors and deputy mayors and other representatives of the local communities. The activities related to the Roma focus of the projects are carried out in the broader context of vulnerable groups and are aimed at joint initiatives of young people with different ethnic profiles.

The development and implementation of youth initiatives is stimulated, as well as fieldwork and mobile work, development of a package of innovative and up-to-date activities tailored to the needs of youth. Another direction of project upgrade includes improving the quality of services currently offered by youth centres, providing opportunities for exchange of experience with organizations from donor countries and European partners and participation in joint campaigns, initiatives and trainings of the National Network of Youth Centres. The implemented activities are aimed at improving the conditions and environment for equal access to education, training and work; increasing the motivation for inclusion of children, youth and parents from ethnic minorities; integration activities for children and young people, by organizing joint initiatives and changing public attitudes towards greater tolerance for young people at risk; motivation for continuing education; soft skills training; promoting the non-formal learning and vocational training of young people; changing public attitudes towards greater tolerance for young people at risk; development of volunteering among young people as a foundation for social cohesion, solidarity and the formation of civic consciousness and others.

The expected results from the implementation of the project activities are: improving the access of young people to the services of the youth centres; increasing the socio-economic progress of less developed municipalities, using young people as a resource for growth and change; activating the participation of young people and persons outside this group in the activities of youth centres; improving cooperation and relations with donor countries; increasing the capacity of the employees of the youth centres – youth workers, mediators, associates, etc.

The implementation of the four projects related to the upgrading and development of youth centres goes beyond the time scope of the mid-term evaluation. Due to the early phase of project implementation in this programming period, no evaluations can be made of their effectiveness and efficiency. However, **they can definitely be identified as good practices, creating sustainable models that can be replicated in other municipalities**. It is no coincidence that the youth centres in Plovdiv and Stara Zagora have been awarded the special "Quality Label" of the Council of Europe. This sign is a testament to the fact that youth centres work in accordance with the high standards of the Council of Europe and its values, as part of a wider international network that promotes activities in five specific areas – education, social activities, youth development, knowledge, and innovation, exchange of experience and cooperation across borders.

The complicated epidemic situation in the country and in Europe notwithstanding, the implementation of the four projects is proceeding within the planned activities and the approved schedules whereas a significant part of the activities are carried out online. **So far, no serious risks of non-fulfilment of the objectives and results of the projects have been identified, although there are difficulties related to the lower effect of some of the activities (such as field work, exchange of experience, exchange of visits with partner organizations, educational and cultural events and others)**. Furthermore, the Youth Centre in Vratsa points at a specific problem, namely difficulties in finding a partner organization from a donor country, which is included as an indicator for project evaluation. Not least, these difficulties and problems are also linked to the pandemic situation in Europe, where travel and direct communication opportunities are severely limited. In addition, the costs of identifying and liaising with potential partner organizations from a donor country are relatively high and create tension in the project budget. On the other hand, the Youth Center Vratsa has established a long-term successful partnership with an organization from another European country, which it would like to continue. It may be appropriate to seek additional opportunities for assistance from POs and NFPs to help find partners from donor countries and to continue existing sustainable partnerships.

In the course of the evaluation and the conducted online interviews with representatives of the youth centers, the team identified several conditions and prerequisites for turning these projects into good practice and a successful model for youth work, which can be successfully replicated:

**First, there exists an effective cooperation and commitment of all stakeholders**. Local authorities express a clear political will and support (including financial) for the implementation of projects for the establishment and development of youth centres. This support is further added to by the recruited youth centres teams, which all work with full dedication, constantly increase their capacity and are dedicated to the effective implementation of the project and achieving its goals.

**Second, the existing good international practices and high standards, which in this case are proposed by the Council of Europe, are fully applied and complied with.** TheCoE representatives actively participate in the activities of the youth centres by offering trainings, mentoring, consultations, joint initiatives, exchange of experience and others.

**Third, active involvement and empowerment of young people regarded not only as project beneficiaries, but also as active participants in the planning and implementation of the activities of the youth centres in positions of youth workers, mediators, trainers, community leaders, influencers, volunteers and others.** Emphasis is placed not so much on individual and ad-hoc activities, but on lasting and complex youth initiatives, which are oriented towards achieving long-term effects and building a sustainable capacity to work with young people.

**Fourth, active networking through the participation in a national and international network of youth centers with wide opportunities for exchange of experience and joint initiatives.** These networks are constantly expanding with the inclusion of new youth centres that can use the experience of existing ones.

**Fifth, the opportunity to replicate the tested good practices and sustainable models of the existing youth centres.** This isdemonstrated alsoby the successfully conducted procedure for recruitment, evaluation and selection of project proposals for the establishment of new youth centres. Altogether 14 applications were received from 23 eligible municipalities, which is indicative for a significant interest in this call. The following projects for the establishment of new youth centres have been approved for funding:

* “Opportunity for Young People to Express Themselves - Creation of a Youth Centre in Gabrovo” (Gabrovo Municipality);
* "Construction of a Youth Centre in the City of Montana" (Montana Municipality);
* “Establishment of the International Youth Centre Burgas” (Burgas Municipality);
* "Building a Youth Centre Pernik - a Model for High Standards of Youth Work" (Pernik Municipality).
1. **Project “Increasing the professionalism in the judicial system”**

The project is financed with BGN 2,591,474.75 and the implementation period is 48 months. The beneficiary is the Supreme Judicial Council, and the partner is the Norwegian Judicial System. The grant agreement (№93-00-69 / 24.02.2020) is signed with the Justice Programme of the Norwegian Financial Mechanism 2014-2021. Information about the project is published on the SJC website (http://www.vss.justice.bg/page/view/104876). The contract has been signed by the Deputy Minister of Justice Prof. Nikolay Prodanov - Head of the Programme Operator of the Justice Programme of the Norwegian Financial Mechanism 2014-2021, and Ms. Daniela Masheva - Member of the Supreme Judicial Council and Project Manager.

**The project aims to** increase the efficiency of the Bulgarian judicial system by improving the procedures related to recruitment and career development of magistrates, strengthening the capacity to implement the European Convention on Human Rights and promoting restorative justice. The implementation of the project will achieve better implementation of the European legal framework, as the set specific objectives are related to:

* Carrying out an analysis of the Bulgarian legislation, Norwegian legal and regulatory methods, practices and approaches in various EU and EEA member states to ensure better functioning of the Bulgarian judicial system in connection with the procedures for appointment, selection and career development of magistrates;
* Strengthening the capacity of the members of the Bulgarian judiciary to observe and implement the provisions of the European Convention on Human Rights by seconding Bulgarian magistrates to the European Court of Human Rights and the Judicial Enforcement Division of the Council of Europe;
* Improving the practices and procedures related to the implementation of restorative justice mechanisms;
* Establish a single register of court interpreters for more transparent and efficient administration of justice.

The project builds on the results achieved under the previous project "Support to the Supreme Judicial Council related to capacity building and improving the efficiency of the judiciary" under Programme Area 31 "Capacity building and cooperation in the judiciary" of the Norwegian Financial Mechanism, which ended in 2016.

**The main activity** of the project (Activity 2 "Increasing the capacity of the members of the Bulgarian judicial system in connection with the observance and application of the provisions of the European Convention on Human Rights") in 2020 is the selection of candidates for secondment at the Registry of the European Court of Justice Human Rights in Strasbourg and in the Judicial Enforcement Division of the Council of Europe. It is planned to second 9 Bulgarian magistrates at the Registry of the European Court of Human Rights in Strasbourg and 3 Bulgarian magistrates in the Judicial Enforcement Division of the Council of Europe. Consecutively, three groups of three Bulgarian judges will be sent to the ECHR and two groups of two, respectively - one, Bulgarian magistrate (judges, prosecutors and investigators) in the Department for Execution of Judgments. The term for the internships in the ECHR is 12 months, and in the Department for Execution of Judgments - 18 months.

By decision of the SJC under Protocol № 14 / 18.06.2020, the Plenum of the Supreme Judicial Council opened a procedure for selection of candidates for secondment to the Registry of the European Court of Human Rights and to the Judicial Enforcement Division of the Council of Europe. Requirements for candidates include:

* Be acting judges (or a prosecutor for the Enforcement Division) at the level of a district, county or appellate court;
* Have at least 3 years of experience as a judge (or prosecutor for the Enforcement Division) at the level of a district, county or appellate court;
* To be fluent in written and spoken English or French at a level of at least C1 according to the European Language Framework;
* Not convicted, no disciplinary offences.

The selection is based on the Methodology for the Selection and Evaluation of Candidates for Internships approved by the Plenum of the Supreme Judicial Council at the Registry of the European Court of Human Rights in Strasbourg and in the Judicial Enforcement Division of the Council of Europe. Due to the difficulties associated with COVID-19 and resp. travel and stay abroad, the number of applications turned out to be smaller than expected. According to Protocol №19 / 23.07.2020. from a meeting of the Plenum of the SJC and supplemented by a decision of the SJC under Protocol №30 / 10.12.2020 there are three approved applications for participation in the selection.

In this regard, the deadline for submitting applications has been extended to 07.12.2020. The internship of the first group of Bulgarian judges in the ECHR is expected to begin in February 2021 for a period of 12 months.

The summary conclusion that can be made on the implementation of the project by mid-2020 is that the project should not be considered at risk. In case the pandemic situation in Bulgaria and in Strasbourg is extended, it is likely that the activities will enter the risk zone. In this sense, the expectations of the programme operator of the *Justice* programme, that despite the existing difficulties (small number of applications) the implementation of the project activities will be successful and will contribute to increased professionalism in the judiciary are realistic and achievable.

**3. Project “Feasibility study for the use of hydropower potential in existing water supply systems and upgrading potential of existing small hydro power plants”**

Within the *Renewable energy, energy efficiency and energy security* Programme, a case study was carried out on the project BGENERGY-1.001-0001 *Feasibility study for the use of hydropower potential in existing water supply systems and upgrading potential of existing small hydro power plants*. The project promoter is the Sustainable Energy Development Agency, and the DPP is the Norwegian Water Resources and Energy Directorate (NVE). The project duration is 12 months (June 15, 2020 to June 15, 2021).

**Concise project description**

The project is expected to provide basic data on large water supply schemes in Bulgaria, which are envidaged to have the potential to combine water supply with hydropower production, by replacing reducing valves in the main water pipes from reservoirs to hydropower turbines.

With the implementation of the project, it is planned to create a database, including hydrology in the catchment areas to determine the inflow, water consumption from reservoirs to reservoirs for water supply, the average annual distribution of water flow and potential water excess for additional energy production.

The project builds upon the use of sustainable hydropower through modern environmental and social know-how approaches, making optimal use of available hydropower resources with the lowest negative impacts. The scope of the project activities envisages an in-depth review of the current policies, legal and regulatory frameworks related to hydropower in water supply schemes; a review of the pre-investment studies of the water supply and sewerage companies available at the Ministry of Regional Development and Public Works; exchange of experience and good practices with representatives of the Norwegian Water Resources and Energy Directorate; conducting trainings for improving the qualification of hydropower experts and popularizing the results through an information campaign.

**Project goals and objectives**

The main goal of the project is to assess both the potential use of hydropower as a renewable energy source by examining all the relevant aspects – political, legal, regulatory, technical and economic, and the qualification and readiness of hydropower experts to ensure the implementation of planned activities. Central for the project proposal is the creation of a database that would cover also assessment of the catchment areas and documentation of the existing technical characteristics of the hydropower facilities. It is expected that the study will highlight the potential for production, as well as the costs and technical challenges associated with the implementation of tools for the use of hydropower resources. In addition, it is planned to analyze the need to initiate changes to facilitate the increase of the potential of existing small hydropower plants in water supply systems. The information from the project will be used to encourage water supply scheme operators to apply for EEA grant assistance in order to realize some of the opportunities for energy production.

Within the time horizon of the mid-term evaluation (June 30, 2020) the implementation of the project has started. The call was launched on November 15, 2019, and the project proposal was submitted on December 6. Following the evaluation of the project, a grant agreement was signed on June 15, 2020. Some technical circumstances related to postal delivery in Bulgaria of the signed partnership agreement between the beneficiary and the Norwegian Water Resources and Energy Directorate are cited as the reason for the delay in concluding the project implementation contract.

Based on the collected additional information, it is established that as of December 2020 the following activities have been implemented: (a) Activity 1: Review of the current policy, legal and regulatory framework in the hydropower sector; b) Activity 2: Review of the pre-investment studies (PIS) of the water supply and sewerage companies available at the Ministry of Regional Development and Public Works existing; c) Activity 3: Collection of data from the water supply and sewerage companies in the country according to the identified checklist. **No significant problems are registered in the implementation of the project and the expectation can be expressed that the project will be implemented on time and meet its objectives.**

1. **Project "Implementation of innovative measures for mitigation and adaptation to climate change in the municipalities in Bulgaria"**

The pre-defined project "Implementation of innovative measures for climate change mitigation and adaptation in municipalities in Bulgaria" is implemented by the National Trust Eco Fund in partnership with the municipalities of Sofia, Plovdiv, Varna, Burgas, Kardzhali, Ruse, Stara Zagora, Sliven and the Norwegian partner - Norwegian Association of Local and Regional Governments (KS).

The main goal of the project is to improve the capacity of local authorities to plan, monitor and implement specific measures to mitigate the impact and adapt to climate change. The project supports eight partner municipalities to assess their strategic plans and programmes and the measures implemented so far to mitigate and adapt to climate change, while identifying gaps and potential risks.

These eight municipalities have the highest risk of natural disasters such as floods, landslides, fires and/or high temperatures, combined with drought, causing water stress. As a result of the project implementation, the most modern knowledge, experience and pilot innovative measures for urban planning will be applied. In addition, the results and good practices are expected to be widely disseminated in other municipalities in the country.

The pre-defined project is funded with EUR 2,800,000, and the duration of project activities is 42 months. On July 21, 2020, the Ministry of Environment and Water announced a call for project proposals under the Open Call №3 Climate under Outcome 4: "Increased capacity of local communities to reduce emissions and adapt to climate change" under the Programme: "Environmental protection and climate change", funded by the FM of the EEA 2014-2021. The grant agreement signed is № D-33-5 as of 04.02.2021.

The expected results are the following:

* Improving the capacity to plan, monitor and implement climate change mitigation and adaptation measures.
* Evaluated strategic plans and programmes of the municipalities and identified gaps and necessary actions in eight municipalities.
* Implemented innovative pilot measures for climate change mitigation and adaptation in urban planning.
* Improved cooperation between donor and beneficiary country organizations under the programme.

**Project activities**

Apart from management activities, the implementation of the project includes activities that would contribute to the achievement of the objective of the programme, in particular Outcome 4 "Increased capacity of local communities to reduce emissions and adapt to changing climate", as follows:

**Activity 1. Improved capacity for planning, monitoring and implementation of climate change mitigation and adaptation measures.**

Capacity building activities for partner municipalities include:

* Review of best practices and experiences and innovative solutions to mitigate and adapt to climate change in Norway and other countries.
* Training for the partner municipalities, including: 1) Climate change in Bulgaria - scenarios; 2) National and EU climate change policy (Strategies for mitigation and adaptation); 3) Methodology for analysis of the existing strategic documents of the municipalities and steps for identification of pilot innovative actions; 4) International experience and best practices with an emphasis on combined mitigation and adaptation measures
* Training for other municipalities.
* Study visits to Norway for project team members from partner municipalities.

**Activity 2. Evaluation of the Strategic Plans and identification of gaps and necessary actions (urban development projects) in eight municipalities, including:**

* Review of the current municipal plans, strategies and investment programmes and the effectiveness of their implementation.
* Identification of the main risks caused by climate change (based on the National Strategy for Adaptation to Climate Change and other analyses and reports in the municipality) - identification of gaps in the field of urban planning, such as the effect of the heat island, floods, landslides etc., related to mitigation and adaptation to climate change.
* Identification of innovative measures and actions in the field of infrastructure and their prioritization.
* Criteria for selecting a specific project to be funded.

**Activity 3. Implemented innovative (pilot) measures for mitigation and adaptation to climate change in urban planning.**

* Development of terms of reference and technical specifications for the technical design of the eight innovative projects, specific to each municipality.
* Implementation of engineering projects aimed at improved urban planning, which will reduce the consequences of increased disasters in urban areas - mainly through improved spatial planning of streets, planning and development of infrastructure facilities to prevent floods and landslides, green infrastructure in cities, improving the permeability of urban surfaces and/or controlling the risks of floods, etc.

**Activity 4. Awareness / educational campaigns on climate change.**

The planned activities include:

* Media coverage.
* Production of printed and electronic advertising materials.
* Initial, intermediate and closing events, working meetings.
* Website of the project.
* Public events in the municipalities.

## **Annex 2. Desk research: documents studied**

**General documents:**

1. Memorandum of Understanding on the Implementation of the EEA Financial Mechanism and NFM 2014-2021;
2. Minutes of Meetings of the FM Committee and the NFP;
3. Strategic Report FM14-21;
4. Register of cases of irregularities and fraud under the EEA FM and NFM 2014-2021
5. Regulation on the implementation of the EEA FM 2014-2021.

**Programme documents:**(for all the evaluated programmes)

1. Programme Concept Note;
2. Programme Agreement;
3. Annual reports;
4. Monitoring reports;
5. Audit reports;
6. Irregularity reports;
7. Management and control systems of the implementation of the programme.

**Additional sources of information**:

* National Statistical Institute and Eurostat;
* Data and information from the official internet cite of EEA FM and NFM 2014-2021 (https://[www.eeagrants.org](http://www.eeagrants.org); https://www.eeagrants.bg);
* Data and information provided by the NFP;
* Data and information provided by the POs.

N**ational strategic, planning, programme and regulatory documents**:

**А) “*Local development, poverty reduction and improved inclusion of vulnerable groups”* Programme:**

* National Strategy for Poverty Reduction and Promotion of Social Inclusion 2020;
* National Youth Strategy (2010-2020);
* National Strategy of the Republic of Bulgaria for Roma Integration (2012 - 2020) and the related Action Plan;
* Framework Programme for Roma Integration in Bulgarian Society (2010-2020);
* Law on Preschool and School Education.

**B) *Renewable energy, energy efficiency and energy security* Programme:**

* Energy Strategy of the Republic of Bulgaria until 2020;
* Energy Act;
* Energy from Renewable Sources Act;
* Energy Efficiency Act;
* Mineral Resources Act;
* Waste Management Act;
* Service Activities Act.

**C) *Environment Protection and Climate Change* Programme:**

* EU Biodiversity Strategy;
* Global strategy for plant protection;
* National strategy for management and development of the water sector;
* National Priority Framework for Action for Natura 2000;
* Strategic Plan for Biodiversity;
* Marine Strategy of the Republic of Bulgaria;
* River Basin Management Plans 2016 - 2021;
* Flood risk management plans;
* National programmes in the field of water protection and sustainable development;
* National plan for protection of the most important wetlands;
* National Strategic Plan for Construction and Demolition Waste Management 2011-2020;
* National Waste Management Plan 2014-2020;
* National Strategic Plan for Sludge Management from Urban Wastewater Treatment Plants 2014-2020;
* National strategic plan for gradual reduction of the quantities of biodegradable waste intended for landfill;
* Environmental Protection law;
* Climate Change Limitation Act;
* Law on Protected Areas;
* Waste Management Act;
* Law on Biological Diversity;
* Law on the purity of the atmospheric air;
* Soil Law.

**D) *Cultural entrepreneurship, heritage and cooperation* Programme:**

* National Development Programme: Bulgaria 2020
* Draft Strategy for Development of Bulgarian Culture 2019-2029;
* National Strategy of the Republic of Bulgaria for Roma Integration (2012 - 2020) and the related Action Plan;
* Framework Programme for Roma Integration in Bulgarian Society (2010-2020);
* Law on Development and Protection of Culture;
* Law on Creative Funds;
* Cultural Heritage Act;

Information was also used from the sites:

* <https://atelie-3.com/bg/kulturno-nasledstvo-i-natsionalni-strategicheski-dokumenti/>
* <https://www.lex.bg/laws/ldoc/2134664704>
* <http://mc.government.bg/files/5495_Strategy_culture_.pdf>
* https://ncf.bg

**E) *Internal Affairs* Programme:**

* National Security Strategy of the Republic of Bulgaria;
* Crime Prevention Strategy (2012-2020);
* Integrated strategy for prevention and counteraction to corruption and organized crime;
* Law on Combating Trafficking in Human Beings;
* Recommendations to Bulgaria in accordance with the Cooperation and Verification Mechanism (CVM);
* National Strategy of the Republic of Bulgaria for Roma Integration (2012 - 2020);
* Framework Programme for Roma Integration in Bulgarian Society (2010-2020).

**F) *Justice* Programme:**

* Strategy for development of the penitentiary system in Bulgaria 2020-2025;
* Updated strategy for continuing the reform of the judiciary (May 2019) and Updated roadmap for its implementation;
* Recommendations to Bulgaria in accordance with the Cooperation and Verification Mechanism (CVM);
* Recommendations of the Venice Commission;
* Strategy for introduction of e-government and e-justice in the sector "Justice" 2014-2020;
* Rules of Procedure of the National Institute of Justice (2014-2020);
* Judgments of the European Court of Human Rights against Bulgaria;
* National Strategy of the Republic of Bulgaria for Roma Integration (2012 - 2020) and the related Action Plan;
* Framework Programme for Roma Integration in Bulgarian Society (2010-2020).

## **Annex 3. Main topics for online in-depth interview with representatives of programme operators**

**THEMATIC BLOCK 1. Design, financing and coordination of the programme**

1.1 Objectives and priorities of the programme

1.2 Projects / Interventions

1.3 Financing of the programme

1.4 Coordination / synergy of the programme

**THEMATIC BLOCK 2. Implementation, changes and risks in the implementation of the programme**

1.1 Status of programme implementation

1.2 Changes in the programme

1.3 Deviations / delays

1.4 Risks in the implementation

**THEMATIC BLOCK 3. Evaluation of the results, efficiency and effectiveness of the programme**

3.1 Design of the evaluation and monitoring methodology

3.2 Evaluation of the achieved objectives and results of the programme

3.3 Risks to achieve the goals and outcomes

3.4 Assessment of resources and proposals for relocation of funds

3.5 Identified problems in programme management

**THEMATIC BLOCK 4. Roma focus of the programme**

4.1 Projects with Roma focus

4.2 Consultative process and inclusion of Roma organizations in the implemented projects

4.3 Territorial distribution of projects with Roma focus

4.4 Impact of projects with Roma focus on the target group

**THEMATIC BLOCK 5. General conclusions, good practices, recommendations**

5.1 Interaction and coordination with partner organizations from donor countries

5.2 Good practices and sustainable models

5.3 Main problems in the management and implementation of the programme and the supported projects

5.4 Suggestions and recommendations for improving the management and implementation of the programme

## **Annex 4. Main topics for an online survey with donor countries partners**

**Questionnaire**

With regard to the conduction of a “Mid-term evaluation of the implementation of the financial mechanism of the European Economic Area (FM-EEA) and the Norwegian financial mechanism (NFM) for the period 2014-2020”, we would like to ask you to answer the following questions:

1. How would you assess the relevance of the goals and priorities of the programme and their correspondence to the problems and needs of target groups?
2. Do you have concrete suggestions for amendments in the goals and priorities of the programme?
3. How would you assess the relevance of interventions under the programme and the results from these interventions to date? Do interventions match the problems and needs of target groups?
4. Could you list examples of good and irrelevant interventions under the programme? Do you have concrete suggestions about the need of additional interventions?
5. Do you think the disposable financial assistance under the FM-EEA and NFM is on the whole sufficient to realize the goals and priorities of the programme?
6. In your view, do the financial assistance of FM-EEA and NFM target the most efficient and effective interventions?
7. Do you have any concrete suggestions for changes in the amount of funds available to the programme and/or for relocation of available financial resources?
8. Do you have any concrete suggestions for relevant changes in the programme and respectively, for signing of annexes to the programme?
9. Have diversions/delays in the implementation of the programme been registered? Which do you think are the main reasons (factors) for these diversions/delays?
10. Do you think that current execution plans for the implementation of measures under the programme are realistic? Do you have any suggestions for changes in the programme implementation schedules?
11. Do you think there is correspondence between goals, expected results and the indicators for monitoring and assessment of the programme? Are they linked to the expected results using concrete and measurable indicators? Have baseline and target values for the results assessment indicators been established in order to accurately assess the completion of expected results and goals?
12. How would you assess the degree of completion of goals, activities, and measures under the programme?
13. Do you think there are risks for failure to achieve programme goals, programmed results and programmed (expected) values of the main indicators of the programme?
14. Do you have concrete suggestions for minimizing the risks of failure to achieve programme goals, planned results and planned values of programme completion indicators?
15. Have you identified any problems in the implementation and management of the programme and the supported projects regarding:
	1. design of the programme or the projects
	2. selection of project proposals
	3. supervision and monitoring of implemented projects
	4. payments
	5. financial control
	6. risk management systems (registration and reporting of irregularities)
	7. assessment and reporting of programme/project implementation
	8. information, communication, and publicity activities
16. Do you have any concrete suggestions for changes in the above listed components of programme/project management and financing?
17. How would you assess the results and the impact of projects with a focus on Roma on this target group?
18. Do you have any concrete suggestions for changes and additions in the programme in view of its Roma focus?
19. How would you assess the cooperation and interaction with the programme operator and the National Focal Point? Have effective and sustainable partnerships been established between organizations in donor countries and their Bulgarian partners? Do you have any suggestions for improving coordination and interaction between organizations in donor countries and their Bulgarian partners?
20. Do you have any suggestions and recommendations for improving the management and implementation of the programme?
1. STRATEGIC REPORT FM14-21,Bulgaria, Reporting period: 01 August 2019 - 31 July 2020 [↑](#footnote-ref-1)
2. Monitoring report of the “Local Development, Poverty Reduction and social inclusion” Programme for 2019, Blomeyer &Sanz, June 10, 2019 [↑](#footnote-ref-2)
3. Monitoring report of the “Local Development, Poverty Reduction and social inclusion” Programme for 2019, Blomeyer &Sanz, 10th June, 2019 [↑](#footnote-ref-3)
4. Monitoring report of the “Local Development, Poverty Reduction and social inclusion” Programme for 2019, Blomeyer &Sanz, 10th June, 2019 [↑](#footnote-ref-4)
5. Established in the previous programming period of the EEA FM (2009-2014) [↑](#footnote-ref-5)
6. EU emissions trading scheme [↑](#footnote-ref-6)
7. In the English language Programme documentation (Programme Agreement and Concept Note) the wording of sub-outcome 1.2 is "Cultural heritage objects made accessible". "Digital" appears in the Bulgarian translation of 1.2 (see also section 2.3 below). [↑](#footnote-ref-7)
8. See General information about the program PA14 "Cultural Entrepreneurship, Heritage and Cooperation" on the website of the EEA FM and NFM at [https://www.eeagrants.bg/programi/kultura/novini/obshha-informacziya-za-programa-ra14-%E2%80%9Ekulturno-predpriemachestvo,-nasledstvo-i-strudnichestvo%E2%80%9C](https://www.eeagrants.bg/programi/kultura/novini/obshha-informacziya-za-programa-ra14-%E2%80%9Ekulturno-predpriemachestvo%2C-nasledstvo-i-strudnichestvo%E2%80%9C). [↑](#footnote-ref-8)
9. According to the data from the 2020 survey of prisoners upon entering the places of imprisonment for 2020, out of about 6500 detainees, about 1900 prisoners have identified themselves as representatives of the Roma ethnic group. [↑](#footnote-ref-9)