

**Ex-ante Evaluation  
and  
Strategic Environmental Assessment**

**of the**

**Romania-Bulgaria  
Cross Border Cooperation Programme 2014-2020**

**Final**

**Ex-ante Evaluation Report**

**Final Version**

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**Glossary of Acronyms**

|  |  |  |  |
| --- | --- | --- | --- |
|  |  | | |
| Appropriate Assessment | | AA |
| Bulgaria | | BG |
| Cross Border Cooperation | | CBC |
| Cross Border Cooperation Regional Office Călărași for Romania-Bulgaria Border | | CBC RO Călărași |
| Common Strategic Framework | | CSF |
| Common Provisions Regulation | | CPR |
| Ex-ante Evaluation | | EaE |
| European Commission | | EC |
| European Territorial Cooperation | | ETC |
| European Union | | EU |
| Investment Priority | | IP |
| Joint Secretariat | | JS |
| Joint Working Group | | JWG |
| Managing Authority | | MA |
| Monitoring Committee | | MC |
| Ministry of Regional Development and Public Administration Romania | | MRDPA |
| Ministry of Regional Development, Bulgaria | | MRD |
| National Authority | | NA |
| Non-key expert | | NKE |
| Operational Programme | | OP |
| Plan / Programme | | P/P |
| Romania | | RO |
| Strategic Environment Assessment | | SEA |
| Short-term expert | | STE |
| Territorial Analysis | | TA |
| Thematic Objective | | TO |

**PROJECT SYNOPSYS**

|  |  |
| --- | --- |
| **General Objective** | The overall objective of the contract is represented by the implementation of an ex-ante evaluation and Strategic Environmental Assessment (SEA) for the Romania-Bulgaria Cross-border Cooperation Programme 2014-2020:   1. ***For ex-ante evaluation***  * To bring a real added value and to improve the quality of the Programme intervention logic by providing valuable judgment and recommendations on the draft versions of the Programme to be submitted to the European Commission, based on the new Regulations corresponding to the future Common Strategic Framework 2014 – 2020, taking into account the ex-ante requirements. * To provide analysis and recommendations by independent experts, separately from the experts involved in programming; * To improve and strengthen the final quality of the Operational Programme.  1. ***For SEA -***The objective of the SEA is to describe, identify and assess the likely significant effects on the environment resulting from implementing the Programme, to be taken into account in its preparation. The SEA will provide decision-makers in the EC and in the partner countries with relevant information to assess the environmental challenges and considerations with regard to the Programme addressing Romania - Bulgaria cross border areas. This information should help ensure that environmental concerns are appropriately integrated in the decision-making and implementation processes. |
| **Purpose** | To conduct and complete an ex-ante evaluation and Strategic Environmental Assessment of the Operational Programme 2014-2020 addressing the cross-border region of Romania-Bulgaria, will result in a Report taking into account the requirements derived from EU relevant documents.  The final aim of the ex-ante evaluation is to ensure that the Operational Programme clearly articulate its intervention logic and can demonstrate its contribution to the Europe 2020 strategy. It should also help to put in place functioning monitoring systems which meet evaluation requirements. Its recommendations should be clear, based on evidence and adapted to the particular needs of the programme. |
| **Results to be achieved** | By the end of the contract, the following results are expected to be achieved:   * **Final ex-ante evaluation** report including recommendations to improve the programming document. * **Final Strategic Environmental Assessment Report** including recommendations, if needed, of reasonable alternatives to be identified, described, evaluated and taken into account before the Programme is adopted. |
| **Target groups** | * The Managing Authority and the National Authority of the Romania-Bulgaria CBC Programme, the Joint Secretariat * National Environmental Agency of Romania and Bulgaria * Other stakeholders: programme authorities involved in designing the programming exercise 2014-2020 |
| **Project start date** | 19 September 2013 |
| **Project end date** | 19 December 2014 |

# Introduction and context of the Ex-ante Evaluation

## Introduction

The evaluation was carried out throughout the planning process. This method made it possible to draw attention to potential problems at an early stage and to ensure a timely response and implementation of recommendations. Current report concentrates on findings and recommendations established on the basis of the final draft of the Romania-Bulgaria Cross-border Cooperation Operational Programme for 2014-2020, as at 8th July 2014.

Starting final draft OP, clear improvements have been observed regarding all aspects. The Programme is well prepared; the thematic objectives have been discussed and agreed on through an extensive programming process. Moreover, the programming took into account lessons learned from previous programming period, the given financial framework and the existence of suitable implementation and administration structures. The Thematic Objectives, Investment Priorities and also the indicators anticipate good results of the Programme in the next programming period. Consultation between the Ex-ante team and the MA took place in order to fine-tune and clarify some elements of the final draft OP and to improve its coherence.

## Objectives and methodology of Ex-ante Evaluation

The purposes of the ex-ante evaluation was

* to ensure that the Programme document for the Romania – Bulgaria Cross-border Cooperation Programme 2014-2020 is in line with the requirements of the relevant regulations regarding the logic and content of the Programme;
* to ensure the relevance and the coherence of the Programme and help optimise the efficiency and effectiveness of the programming.

The team of Ex-ante evaluators acted as a partner of the responsible authorities and the planners by providing independent judgments and recommendations on the draft versions of the Programme with the final aim of maximizing its final quality.

Evaluation was carried out on an **ongoing basis**, with evaluators and participants in the planning process communicating closely. Additionally, extensive document analysis has been carried out that encompasses the examination of the documents defining the strategic and legal context of the programme, and also the assessment of all documents prepared by the planning team. On this basis, a series of draft reports of interim nature with detailed comments have been produced by the evaluation team and discussed with the planners and the national authorities. Within this framework a very intense and fruitful communication has been developed between the MA and the evaluators that resulted in clear improvement in the various drafts of the OP.

**Theory-based evaluation** was chosen for Ex-ante evaluation as the central framework for the evaluation, which focuses on the comparison of causal linkages developed on the basis of various sources (theoretical literature, policy documents, and expert opinions).

**Matrix-based assessment techniques** were applied throughout various stages of assessment.

**Interviews** were conducted and **questionnaires** were applied to gather relevant data and also **focus groups** were organised with purpose to validate the assessment findings and to improve respective Programme chapters.

The **methodology of evaluation** was chosen in consideration of the purpose of the evaluation, the specific nature of the process of drawing up the strategy documents and the resulting constraints: the limited time resources of both the evaluators and the planners and, the changing environment.

# PROGRAMME STRATEGY

## The basis of the strategy

Strategy has been based on a Territorial Analysis (TA) that forms the sound basis for the Programme strategy and intervention logic. The OP provides a brief overview of the geographic and administrative coverage of the Programme and a comprehensive presentation of the main characteristics of the region, including an analysis of all the sectors that the Programme seeks to address. Needs and challenges have been presented clearly and appropriately for forming the main basis of the strategy; conclusions on how the cooperation Programme will address the needs and challenges being also backed-up by concrete data.

Strategy builds also on a general statement and well defines a long-term vision of the Programme region. All issues that are addressed[[1]](#footnote-2) are of important concern for the economic development, societal well-being and for sustainable economic development. The Programme provides support to cross border partners and allows developing applications that will help partners living on both sides of the border.

## Selection of the TO’s and IP’s

The strategy of the OP combines intervention areas linked to five Thematic Objectives (TOs) in line with the Common Provisions Regulation (CPR); each of TOs are assigned to separate Priority Axis (PA). Altogether seven Investments Priorities (IPs) have been selected. In addition, a sixth Priority Axis (Technical Assistance) aiming at supporting the implementation of the OP was proposed. This approach will also allow for re-allocations between the priorities.

The share of four Priority Axes in financial terms are clearly within the limit of 80% set by the ETC regulation request for thematic concentration; the concentration requirement is even fulfilled by three of the PAs (PA 1, PA 2 and PA 3). Consequently, funding allocated to two of the chosen PAs falls below 10% of the Programme’ allocation, respectively (PA 4 and PA 5). The low number of selected IPs shows clear efforts of concentrating the programme resources.

Justification for the selection of the Thematic Objectives and Investment Priorities is based on the needs and challenges identified by the analysis and provides a good basis for the strategy and the intervention logic of the Programme. Reference to *Commission services country position paper*, is mentioned in the Territorial Analysis and supports the choice for distribution of funds. The justification for the TOs/ IPs was improved substantially in the planning process. Consequently, the TOs selection has been adequately justified reflecting the development needs of the region.

Taking into account the financial allocation, the selected strategy puts a strong emphasis on accessibility and, consequently on transport infrastructure, followed by environment protection and risk prevention and management. The strategic choice is in line with the region’s assets and development opportunities: by improved accessibility the cross-border area can become more attractive for businesses and foreign investments due to its strategic location; through the sustainable use of regional natural and cultural assets the cross-border area can, based on its unique assets, foster ecotourism development, that further contributes to growth and prosperity in the region; whereas measures supporting biodiversity protection and the efforts to develop joint disaster risk prevention and management systems help realize the sustainability-related objective of the Union, including increasing the mitigation capacity to climate change, that has been also considered as an important factor of boosting economic development in the cross-border region. Complementarity can be observed through mitigating harmful effects of greater traffic by protective measures.

## The coherence and consistency of the objectives

The individual Investment Priorities/ Specific Objectives are adequate interrelated and thus reasonable synergies between the support in the various areas can be generated. The Programme interventions may well result in good enough effect and impact. The strongest mutual linkages can be observed within the two Priority Axes “A well connected region” and “A green Region” (each cover two Investment Priorities / Specific Objectives) and between Priority Axis “A green Region” and Priority Axis “A safe Region”. In terms of Specific Objectives, the Specific Objective 5.1 that is addressing governance issues and the capacities of administration contributes most to the other Specific Objectives and, the Specific Objective 4.1 that is addressing employment and labour mobility issues contributes least to the other specific objectives. The synergy between Priority Axis 2 and Priority Axes 1, 3 and 4 is a good evidence for CBC Programme coherence.

The internal coherence of the Programme provides clear strategic direction to the improvement of the overall development of the cross border area.

The chosen thematic objectives are well in line with the Common Strategic Framework (CSF) and the recommendations of the European Commission Position papers on the foreseen priorities for funding for each Member State (MS) at a National and at European Territorial Cooperation level, with the Partnership Agreements of both countries and with the relevant macro-regional strategies (well in line with the Common Provisions Regulation, Annex 1, article 7).

The Specific Objectives of the Programme and the related actions are in line with the EU 2020 Strategy and correlated with five out of seven Flagship initiatives covering the three priorities. The Priority Axes are well coherent with Europe 2020 Strategy goals, respectively with the common European transport policy, the Environment policy and EU’s key environmental goals, the Climate change policy and EU’s related papers and, responds to the need for a more integrated labour market and to one key priority of the EU for a successful implementation of the EU 2020 Strategy – the modernisation of public administrations.

The planned PAs complement Romania and Bulgaria efforts at national level through coordinated activities that focus on the border area especially in the field of transport (TO 7), environment (TO 6) and climate change (TO 5) and also in the field of labour market (TO 8) and public administration (TO 11). Relevant linkages to European Union Strategy of the Danube Region (EUSDR)[[2]](#footnote-3) have been made by the programme (contributing to the four pillars and to most of EUSDR Priority Areas) and also coherence with Black Sea Synergy (still under discussion) initiative has been considered.

Through improvements in regional connectivity with respect to remote regions in accessing the TEN-T corridors, operations envisaging environment protection and management, climate change mitigation and adaptation and resource efficiency and training with a view to support creation of an integrated cross border labour market the Priority Axes can complement the actions of the Connecting Europe Facility, of programmes such as LIFE, the European Agriculture Fund for Rural Development (EAFRD) or the European Maritime and Fishery Fund (EMFF) and of “Erasmus +”.

With its location on the Danube and the Black Sea Coast, many of the sectors and the focus areas within the Blue Growth strategy have high or medium relevance in the context of cross-border area development. The Programme is in accordance with the RO&BG Position Papers related statement.

The RO-BG Cross Border Programme 2014-2020 also converge with the EU Strategy for Blue Growth, the Convention for the Protection of the Black Sea against Pollution and the Black Sea Synergy (the last one being still under discussion), through support for mobility and sustainable transport, environment protection and risk mitigation, contribution to economic and social development and, cooperation at CBC level.

## The Intervention logic

Specific Investment Priorities have been selected among the pre-defined ones, Territorial Analysis results being well considered.

Detailed assessment has been made by Priority Axis that examines their internal intervention logic[[3]](#footnote-4) and proposals for amendments were made during the process of the evaluation. Now the intervention logic shows good coherence and the intended change is likely to be achieved:

* Specific Objectives: In relation to each selected investment priority one Specific Objectives (SO) has been well defined both in relation to the scope of the selected IP and the needs identified by the analysis. They are also correlated with the financial allocation.
* Expected Results: The envisaged results are coherent with the identified needs and contribute to achievement of Specific Objective.
* Outputs: The listed types of outputs properly cover the envisaged actions and can help monitor and evaluate the progress toward results.
* Actions: Examples of indicative actions are well provided, divided by: “Soft," “Hard” and “Integrated" types of measures. The envisaged actions strongly contribute to the expected results.

Moreover, the described target groups and beneficiaries correspond to interventions to be supported and intended results. The whole cross-border area is targeted and specificities of each Priority Axis intervention are well captured and addressed. The funding will be through grants and the selection of operation shall be performed in a similar manner for all Priority Axes following a procedure in accordance with EC regulations.

## Horizontal principles

The promotion of equality between men and women and, the arrangements to ensure the integration of the gender perspective and prevention of any discrimination, as well as contribution to reducing disparities between urban and rural areas in terms of economic development, innovation, social cohesion and access to public services at Programme level and operation level are well described and the proposed arrangements will ensure the contribution to these principles. The principle of “Sustainable development” is considered in all steps of the elaboration of the Operational Programme and provides sufficient basis for the relevant actions in the implementation phase to take into account environmental protection requirements, resource efficiency, climate change mitigation and adaptation, disaster resilience and risk prevention and management.

# INDICATORS

With the increased focus on results for the 2014-2020 programming period, the identification of indicators and the arrangements for monitoring and data collection gain an increased importance. The draft OP provides for each Priority Axis and specific objective a set of well defined result and output indicators. The defined indicators are specific, relevant, achievable, easy to monitor and realistic. All indicators have cross border character and are able to reflect the results of the program.

## Relevance of proposed programme indicators

Significant progress has been made in the development of proposed programme indicators during the programming process. The selected *result indicators* arerelevantand reflect progress towards the objectives set. The *output indicators* are specific and logically linked to objectives, activities to be funded and the result indicators.

**Result indicators**

The intervention logic is in line with the Regulation (EU) No 1299/2013, Article 16 (3) stipulating that programme-specific result indicators relate to investment priorities. One result indicator has been defined for each Specific Objective.

The selected result indicators relate to the most important intended changes described under the respective section of each Priority Axis. All result indicators are bound to the Specific Objectives and the planned operations and cover the intended changes; the detailed review confirmed the logical interconnection between Specific Objectives, results to be achieved and result indicators.

In cases where the possibility of results being influenced by external factors apart from the Union intervention, these factors would need to be identified and their impact analysed when Interim/ final Programme evaluations will take place.

**Output indicators**

The output indicators are specific and logically linked to objectives, activities to be funded and the result indicators and they are also understandable and easy to measure. **Common output indicators** (COI) (as laid down by the Annex to the Regulation No 1299/2013) are used (more common output indicators have been defined) as well as programme specific indicators (PSI)and, all are relevant to the content of the planned interventions and contribute to measure the specific objectives and the most important envisaged changes.

## Clarity of proposed programme indicators

The result and output indicators have a clear title and understandable meaning.

Result indicators have been originally designed for the purpose of this Programme. Most of them are composite indicators that do not have an accepted normative interpretation, i.e. their interpretation will depend solely on their definition and description of methods for data collection.

With regard to output indicators, they all have a normative understanding (km, numbers, ha).

The Guidelines for Applicants will give special attention to indicators regarding: definitions of all indicators, description of methods for data collection, practical examples of their utilisation in programme’s interventions.

## Quantified baseline and target values

It is possible to set a quantified baseline for all result indicators as they are defined in the draft OP. Targets for the result indicators are all set for 2023. The targets have been set both in quantitative and in a qualitative way (e.g. number, %). The Programme document includes also quantified targets for 2023 for all output indicators. Considering the set targets and the financial allocations, the Ex-ante evaluators concluded that these are feasible and can be accomplished by 2023.

## Suitability of milestones

The draft OP has established values for milestones (2018) and targets (2023) for proposed indicators, all relevant. Considering the rhythm of implementation of the current Programme, the planned actions, forms of support and financial allocations it is realistic to expect that the implementation of the next Programme will contribute to developments in the desired direction.

## Administrative capacity, data collection and evaluation procedures

The management and control system and the implementation structures, including monitoring and evaluation functions, are in place and functioning and, are adequate:

* The structures in charge with monitoring and evaluation of the OP
* The procedures to ensure timely and quality data collection for decision making, reporting and evaluation
* The methodologies for data collection and processing for programme indicators
* The procedures and guidelines to ensure the quality of data.

Procedures for monitoring of achievement of indicators and conducting evaluations are adequate and will rely on surveys and Programme and project monitoring.

For 2007-2013 Programme there are clear specific rules, guidelines and instructions for Beneficiaries. It is expected that this good practice to be in place for the next period too and, if needed, the procedures, methodologies, tools related to data collection, monitoring and evaluation to be updated.

There is still room for improvements and thus a new electronic management system will be developed which will allow for better and timely monitoring of projects and Programme.

The implementation of the 2007-2013 and the 2014-2020 Programmes will overlap in time, while the very same units will be responsible for the management of the two Programmes. Therefore the managing parties will ensure capacity in order to avoid any problems of overload.

# CONFORMITY OF FINANCIAL ALLOCATION

The financial allocations are in line with the recommendations of the CPR and ETC regulations regarding concentration of funds. Justification is based on estimated relative importance of the Thematic Objectives/Priority Axes based on identified challenges and needs and on the analysis of the types of actions under each priority and the types of investments to be made and the expected results and the estimated long term impact. In addition, the performance and experience from the previous programming period and the estimated absorption capacity of the potential project holders to develop feasible projects including the magnitude of needs of resources of typical projects has been considered.

# CONTRIBUTION TO EUROPE 2020 STRATEGY

The Programme contributes to smart (Priority Axis 1, 2, 4 and 5), sustainable (Priority Axis 1, 2, 3 and 5) and inclusive (Priority Axis 4 and 5) growth[[4]](#footnote-5) through an integrated approach in order to address common territorial challenges. The emphasis has been put on “smart” and “sustainable” growth whereas share of the „inclusion“ objectives (TO 8 and TO 11) is smaller. The strategy is partly justified by the strong need to concentrate on the preconditions of economic development and partly by the fact that interventions in the specific framework of the CBC Programme could not effectively enhance social inclusion (can not have a typical cross-border character). The indicators applied within the programmes enhance strategic actions and measure outcomes that are relevant to EU strategies.

# Other important aspects

## Integrated approach to territorial development

The section answer regulations requirements and, the provisions shows coherence with Partnership Agreements, corresponding *Position of the Commission Services on the development of Partnership Agreement and programmes for the period 2014-2020*, EUSDR and other relevant macro-regional strategies (MRS) concerning the Black Sea region.

Neither Community-led local development, nor integrated actions for sustainable urban development nor Integrated Territorial Investment (ITI) are applied. The evaluators agree that none of the tools are relevant to the Programme.

## Implementing provisions for the cooperation programme

The section has been drafted in compliance with the ETC regulation and the CPR, the chapter was improved following the recommendations formulated to clarify the exact role of institutions as well as to provide additional information regarding certain aspects of programming and management of the Programme. The experience, good results and lessons learned of the previous programming period 2007-2013 were taken into account. The intended continuity in terms of JS and nominated members of MC is welcomed.

## Coordination

Description of coordination mechanisms to be set up in order to avoid overlapping mainly with “mainstream” national OP’s is included properly, as well as areas where support under the cooperation Programme can complement other funding; improvements have been done based on previous recommendations.

## Reduction of administrative burden for beneficiaries

The proposed actions are comprehensive and relevant to the most critical issues related to administrative difficulties that beneficiaries have reported during previous programming period and represent a step forward in reducing the administrative burden for the project beneficiaries.

## Separate elements

The chapter observes the Regulations provisions; a comprehensive performance framework is prepared; relevant partners and stakeholders have been involved throughout the programming stage.

# Conclusions and Recommendations

The evaluation was an iterative process carried out throughout the programming of OP as the Ex-ante evaluation play a pivotal role in this architecture. Thus, the Ex-ante evaluators worked closely and communicated with the parties involved in the process and responsible for the preparation of the Programme. Accompanying the design of the Programme and appraising the OP different components, from the selection of the thematic objectives to the set up of a functioning monitoring and evaluation system, the method allowed to draw attention to potential problems at an early stage and to ensure a timely response and implementation of recommendations.

The work was undertaken in stages, depending on when elements of the Programme were available and, feedback was offered to the Managing Authority and to the programmers through EaE reports and other statements regarding assessments of Territorial Analysis, intervention logics, Operational Programme drafts and indicators’ system. As different elements of the evaluation were completed, the programme planners reviewed the outcomes of earlier steps.

The main assessment steps were as follows:

* December 2013: a preliminary Assessment of the Territorial Analysis took place followed by a debriefing with the Managing Authority, the Cross Border Cooperation Regional Office Călărași for Romania-Bulgaria Border and the Programming team.
* January – March 2014: assessment and feed-back was offered on the logic intervention for Thematic Objectives 5, 6, 7, 8, 9, 10 and 11.
* April – May 2014: assessment of the 1st draft OP took place followed by debriefing and consultations with the Managing Authority, Cross Border Cooperation Regional Office Călărași for Romania-Bulgaria Border and the Programming.

This assessment focused on the intervention logic of the OP and offered detailed feed-back and recommendations on the elements provided in the 1st draft OP.

* May 2014: consultation of Indicators system.
* June 2014: assessment of 2nd draft OP, followed by debriefing meetings with the Managing Authority, Cross Border Cooperation Regional Office Călărași for Romania-Bulgaria Border and the Programming team.
* June 2014: Focus Group on indicators system.
* July: assessment of final draft OP followed by consultation with the Managing Authority.
* July 2014: Group interview and Questionnaires on Administrative capacity, data collection and evaluation procedures; Focus Group on Financial allocation.

A table summarising the main conclusions and recommendations of the Ex-ante team and the version of the OP that integrated the respective recommendations is provided in the Annex to the report.

# Action plan for proposed recommendations

No further recommendations are to be implemented.

# Annex Conclusions and recommendations

Given the fact that Sections 1 and 2 of the first draft OP were further substantially restructured when issuing the second draft OP, the conclusions and recommendations are presented separately for the 1st, respectively the 2nd draft OP. All the recommendations were discussed and agreed and, consequently, were implemented throughout the revisions of OP. The main findings and conclusions along with corresponding recommendations are presented in tables below.

## Table 1 - Conclusions and recommendations following 1st Draft OP

| **Findings & Conclusions** | **Recommendations** |
| --- | --- |
| 1. **PROGRAMME STRATEGY** | |
| * The chosen Thematic Objectives are well in line with CSF, the recommendations presented by the European Commission Position papers on the foreseen priorities for funding for each Member State (MS) at a National and a European Territorial Cooperation (ETC) level. They also well reflect the Draft Partnership Agreements (PA) for Romania and Bulgaria. * The main themes in the Territorial analysis and SWOT analysis serve as a basis for the identification of the main challenges facing the CBC region during the programming period. However: * The information as provided under OP chapter 1.1.1 and chapter 1.1.2 has severe limitations to provide a sound background and basis for the strategy and the intervention logic of the Programme. * The information provided in the draft OP does not accommodate each of the priority axes with a sufficient overview of the main characteristics and trends of the sector and the main challenges and needs in order to justify the chosen objectives and envisaged results and actions. * The justification for most of TOs / IPs selection as presented in Draft OP (1st April) is rather weak. In addition, there is a low level of interrelations between the envisaged specific objectives and actions (internal coherence). | * Assessment of challenges and needs for the programme - the description of the specific sectoral situation and the needs and challenges require substantial improvements and there is lack of relevant info already pointed out in the SWOT analysis. * The OP chapter 1.1.1 and chapter 1.1.2 need to provide a more in detail analysis of all the sectors that the program seeks to address with its interventions, following the structure/the sectors of the priority axes of the intervention logic.   Each sector/ area should provide:   1. a brief description and characteristic of this sector including development trends 2. information on the main challenges and needs (that are also going to be addressed by the interventions of the Programme).  * The statement on the strategic priority must be revised to provide more clarity on its meaning. * The justification and strategy of the individual priority axes must be improved. |
| 1. **Assessment of PRIORITY AXES** | |
| **PA “A skilled and inclusive region”** | |
| 1. **Consistency with EU and national policies and territorial challenges and needs** | |
| * The specific objective and the related actions are in line with the EU 2020 Strategy and correlate with the *Inclusive growth* priority of the Europe 2020 Strategy, the Flagship Initiative: "An agenda for new skills and jobs" and *Smart growth* priority the Flagship initiative: "Youth on the move". * The envisaged activities under the Specific Objective 1.1 are only partially in line with the CSF provisions. * When presenting the Needs, Challenges and opportunities, the OP shows little correlation with TA findings and conclusions, the information is misplaced and there is no clear distinction between Challenges and Opportunities. | * The Strategy for this Priority Axis needs to be reconsidered and adapted. There is need: * To revise Challenges and Opportunities, and Needs chapters * To ensure their correlation with TA findings and conclusions * To ensure their internal coherence * To ensure correlation with both employment and labour mobility. |
| 1. **External Coherence** | |
| * The Romania and the Bulgaria Partnership Agreements partially provide support for this SO and corresponding indicative actions in terms of cross-border cooperation. * The Priority Axis may contribute to some extent to EUSDR 3rd pillar, Priority Area 09 and may slightly contribute to EUSDR 4th pillar, Priority Area 10. * The Priority Axis does not show actual contribution to Black Sea Synergy. | * N/A |
| 1. **Intervention logic** | |
| * The specific objective considers most of the key messages identified in the Sectoral SWOT Table of the TA. * The Result defines another objective, but does not provide information about specific results that the interventions should achieve. * The proposed Result Indicator is not very specific and it is difficult to operationalize. * Some of the listed actions might be very adequate to contribute improving the situation on the labour market in the region, but the cross-border dimension of the action might be limited. * The examples of actions under this Priority Axis show a certain unbalanced coverage of the expected main areas that should be addressed in order to improve the employment situation in the region. * The OP does not provide information on expected outputs. | * The specific objective could be re-formulated; e.g. “…to contribute to an integrated labour market development”. * To elaborate clearly distinguishable result(s) on the basis of the revised objective(s). * To consider the definition of a new result indicator; it should also take into consideration the expected (re)definition of the envisaged result(s). * To enhance description of expected contribution of actions to the specific objective. * To ensure observance of Annex II to CSF provisions and the provisions of CSF for TO 8 in terms of Key actions for ERDF. * The provide information on expected outputs. * Revision of the indicators in the light of the overall discussion and decision on the indicator system, once the general approach is decided (what kind of indicators, introduction of standard categories of type of actions) and the final list of envisaged type and examples of actions. * To revise the target groups to include all categories the interventions are hoping to influence. |
| **PA “A well connected region”** | |
| 1. **Consistency with EU and national policies and territorial challenges and needs** | |
| * The Specific Objective and the envisaged activities are in line with the EU 2020 Strategy, contributing specifically to *Sustainable growth* priority, the Flagship Initiative: "Resource efficient Europe". * The Specific Objective and the envisaged activities are in line with the CSF key actions. * The Priority Axis is addressing existing challenges, needs and opportunities that have been elaborated in the Territorial Analysis. However, some of them (lack of coordination of public transport, traffic safety, mobility services, multimodal nodes) are not properly funded and addressed in the Analysis presented in Section 1 of this draft OP. | * To improve analysis of needs, challenges and opportunities and how the OP will address them. |
| 1. **External Coherence** | |
| * The chosen Thematic Objective and Investment Priorities are in line with the Position papers, the Romania and Bulgaria Partnership Agreements and with the recommendations of the Common Provisions Regulation, Annex 1, article 7. * The Priority Axis contributes to the EUSDR 1st pillar, Priority Area 1. * The Priority Axis touches one potential initiative of the Black Sea Synergy (still under discussion). | * N/A |
| 1. **Intervention logic** | |
| **IP7b**   * The Specific Objective does not refer to the connectivity to the multimodal nodes along the Danube and of secondary and tertiary nodes to the large transport networks. * Some of the listed results would better fit to the Investment Priority 7 c) not being directly related to the connectivity to cross-border and TEN-T networks and multimodal nodes. * The envisaged result indicator (% Reduction of travelling time to TEN-T corridors and envisages as measurement unit “minutes”) might very closely picture the specific objective. However, it is unclear what baseline could be defined for such indicator on Program level and, the two aspects/ dimensions (% and minutes) of the indicator and the measurement unit do not consistently match. * The selected actions are in general in line with the CSF provisions (Key targets and objectives and, Key actions for ERDF and Cohesion Fund). * The envisaged actions contribute to achieving the Specific Objective and the envisaged result. * Target groups are described in a quite vague manner.   **IP7c**   * The SO is well formulated. * The result is precise and clearly formulated. * The result indicator is in fact an output indicator. * The envisaged actions contribute to achieving the Specific Objective and the envisaged result. | **IP7b**   * A re-wording of the Specific Objective might be considered. * Reconsider the result indicator in the light of the new definition of the specific objective and the overall indicator system. * To enhance description of expected contribution of actions to the specific objective. * To reconsider if investments are really intended under this Specific Objective and if so, to clearly address that. * Revision of the indicators in the light of the overall discussion and decision on the indicator system and the final list of envisaged type and examples of actions.   **IP7c**   * A 2nd Specific Objective and/ or an additional result and corresponding result indicator might be introduced covering actions (to be introduced) related to public transport and mobility services and traffic management. * To enhance description of expected contribution of actions to the specific objective. * Revision of the indicators in the light of the overall discussion and decision on the indicator system and of the final list of envisaged type and examples of actions. |
| **PA “A green region”** | |
| 1. **Consistency with EU and national policies and territorial challenges and needs** | |
| * The Specific Objective and the envisaged activities are in line with the EU 2020 Strategy, contributing to *Sustainable growth* priority, the Flagship Initiative "An industrial policy for the globalisation era". * The Specific Objective and the envisaged activities are in line with the CSF key actions. * The TA was considered. | * As no single strategic priority was formulated, the related Challenges and opportunities need to focus only on those areas which will be supported by the Operational Programme and thus limited to protected areas, natural risk management and decreasing environmental vulnerability related to natural and anthropic hazards. |
| 1. **External Coherence** | |
| * The chosen Thematic Objective and Investment Priorities are in line with the Position papers and, the Romania and Bulgaria Partnership Agreements. * The Priority Axis contributes to the EUSDR 1st pillar, Priority Area 3, to 2nd pillar Priority Area 6 and may slightly contribute to EUSDR 4th pillar, Priority Area 10. * The Priority Axis touches the challenges affecting the Black Sea region that addresses the environment and biodiversity conservation. However, the Priority Axis does not show actual contribution to Black Sea Synergy and/ or Blue growth. | * N/A |
| 1. **Intervention logic** | |
| **IP6c**   * The Specific Objective is compliant with the identified needs. * The result is limited to the emergence of a “model” for the joint protection. This might narrow to much the scope of this Intervention. * The envisaged actions contribute to achieving the Specific Objective and the envisaged result. * For most of the envisaged actions a plausible relevance/ value-added to tackle that issue in a cross-border context might be argued. * The mentioned outputs do not cover the whole likely range of outputs from actions in case that also capacity building and awareness raising actions are envisaged. * The ETC regulation proposes a Common Output Indicator (COI) for sustainable tourism: “Increase in expected number of visits to supported sites of cultural and natural heritage and attractions” This COI would properly cover many of the envisaged outputs.   **IP6d**   * The Specific Objective is well formulated. * The OP concludes in one main result of this Investment Priority that is precise and clearly formulated. * The 3rd Result Indicator might be the most appropriate to cover the envisaged objective / result. * The envisaged actions contribute to achieving the Specific Objective and the envisaged result. * For most of the envisaged actions a plausible relevance/ value-added to tackle that issue in a cross-border context might be argued. * The listed outputs cover properly the envisaged actions. * There are high similarities between OI 3 and OI 4. It might be considered if it is possible to merge these two OIs into just one. * Output Indicator OI 5 might be too vague to clearly measure envisaged outputs. | **IP6c**   * Consider a slight re-wording of the envisaged result. * Define another result indicator.   In case the envisaged result under this Investment Priority is really the better valorisation of natural and cultural heritage for tourism development, a result indicators might be considered that measure changes in the regional tourism activity like: visitors/ guests in the region, number of guest overnights, regional tourism income.   * To enhance description of expected contribution of actions to the specific objective. * To make explicit the envisaged/ necessary cross-border dimension in the description of examples of actions. This especially applies also in cases where investments are being undertaken. * Revision of the indicators in the light of the overall discussion and decision on the indicator system and of the final list of envisaged type and examples of actions.   **IP6d**   * Consider using only Result Indicator 3 (possibly in a slight re-wording). * To enhance description of expected contribution of actions to the specific objective. * To make explicit the envisaged/ necessary cross-border dimension in the description of examples of actions. This especially applies also in cases where investments are being undertaken. * To ensure clear demarcation of actions under IP 6c and those under IP 5b. * Revision of the indicators in the light of the overall discussion and decision on the indicator system and the final list of envisaged type and examples of actions. |
| **PA “A safe region”** | |
| 1. **Consistency with EU and national policies and territorial challenges and needs** | |
| * The Specific Objective and the envisaged activities do not directly relate to the EU 2020 Strategy. Slight contribution may be to EU *Sustainable growth* priority. * However, this OP directly relates to other EU strategic documents related to climate change and the prevention of natural and man-made disasters/ risk prevention and management. * The indicative actions for Priority Axis are in line with the CSF provisions (Key actions for ERDF and Cohesion Fund). * The key territorial challenges corresponding to TO5b are in general well analysed, considered and adapted when taken into account in the programme strategy. | * References to landslides risks, protection belts for Danube banks and other natural barrier, rescue services are missing. * The needs corresponding to TO5b do not include reference to preventive actions. * Challenges should be extended to improve the correlation: Challenges – needs – CBC priorities. |
| 1. **External Coherence** | |
| * Promoting climate change adaptation, risk prevention and management was selected within both Romania and Bulgaria Partnership Agreements with and potential contribution to the related main development needs and, the corresponding Position Papers consider this as a priority for intervention from the CSF Funds. * The Priority Axis contributes to the EUSDR 2nd pillar, Priority Area 5 and 4th pillar, Priority Area 10. * The Priority Axis does not show actual contribution to Black Sea Synergy and/ or Blue growth. | * N/A |
| 1. **Intervention logic** | |
| * The specific objective considers the key messages identified in the Sectoral SWOT Table of the TA and is relevant to the needs/challenges and within the EC guidance. * The OP concludes in one main result of this Investment Priority that is precise and clearly formulated. * The envisaged actions contribute to achieving the Specific Objective and the envisaged result. * For most of the envisaged actions a plausible / high relevance / value-added to tackle that issue in a cross-border context can be argued. * The listed outputs cover most of the envisaged actions. * The target groups are generally described and may not contain all types of target groups - e.g. decision makers in the area of disaster risk and emergency at national, regional, county, local level. | * Consider remodelling the result indicator. * Consider using only Result Indicator 3 (possibly in a slight re-wording). * To enhance description of expected contribution of actions to the specific objective. * To make explicit the envisaged/ necessary cross-border dimension in the description of examples of actions. This especially applies also in cases where investments are being undertaken. * To comprehensively describe the target groups / include all categories and, describes reasons for choosing them and how the intervention aims to influence each category of target group. * Revision of the indicators in the light of the overall discussion and decision on the indicator system and the final list of envisaged type and examples of actions.   Additional use of Common Output Indicators might be taken into consideration. |
| **PA “An efficient region”** | |
| 1. **Consistency with EU and national policies and territorial challenges and needs** | |
| * The Specific Objective and the envisaged activities do not directly relate to the EU 2020 Strategy. Nonetheless, to achieve its targets, the Europe 2020 Strategy requires addressing administrative capacity in an integrated manner. * The indicative actions are in line with the CSF provisions. * The analysis of the situation in the programme area considers the results of the TA; almost all challenges identified in the TA are considered. | * To improve the analysis of the situation in the programme area: * The introductory analysis part should be strengthened with conclusions from relevant documents to help justifying the need to increase efficiency of public administration. Needs and challenges section should be improved to enable correspondence with the indicative actions. * The description of territorial administrative set up should be followed by reference to cross-cutting issues related to good governance perspective (transparency, accountability, participatory, responsiveness, effectiveness and efficiency). * Reference should be made also to one of the TA findings related to low involvement of civil society actors in elaboration of strategies for delivery of public services and identification of project pipeline at local level. * Reference should be made to the quality of public services and accessibility of the citizens to these services (use of e-Government services). Info should have been provided regarding obsolete equipment / infrastructure, lack of infrastructure for managing efficiently the documents, etc. |
| 1. **External Coherence** | |
| * The Romania and the Bulgaria Partnership Agreements partially provide support for this SO and corresponding indicative actions in terms of cross-border cooperation. * The Priority Axis contributes to EUSDR 4th pillar, Priority Area 10. * The Priority Axis does not show actual contribution to Black Sea Synergy. | * N/A |
| 1. **Intervention logic** | |
| * The Specific Objective is clearly formulated and reflects the needs and challenges listed in the SWOT Table of the TA. * As the envisaged result(s) under this specific objective have not been clearly defined it is difficult to define an adequate corresponding result indicator. The proposed result indicator is not sufficiently specific to clearly measure achievements under this specific objective. * The proposed actions are relevant to address the identified needs of the region and are adequate to contribute to the specific objective. * For most of the envisaged actions a plausible value-added can be argued to tackle that issue in a cross-border context. * There is no information provided concerning the envisaged type of outputs. * The proposed Output Indicators are defined very narrowly. | * To reformulate the result indicator once (a) clear envisaged result(s) is/are defined. * To enhance description of expected contribution of actions to the specific objective. * To reformulate actions and to make explicit the envisaged/ necessary cross-border dimension in the description of examples of actions. * To explicitly present envisaged types of outputs, ideally in form of a list. * To revise the Target groups and beneficiaries chapter in order to comprehensively describe the target groups/agree on eligible categories and, describes reasons for choosing them and how the intervention aims to influence each category of target group. * Revision of the indicators in the light of the overall discussion and decision on the indicator system and the final list of envisaged type and examples of actions. |
| **PA „Technical Assistance“** | |
| The PA is defined in accordance with Regulation provisions. | * To enhance description of expected contribution of actions to the specific objective. * Indicative actions should be grouped and restructured based on PCM Cycle: management, implementation, monitoring and control, communication, evaluation, information system, etc. |
| 1. **Assessment of other OP chapters** | |
| **Integrated approach to territorial development** | |
| * The information provided is a comprehensive overview of the previously described intervention logic and its justification. * The draft OP extensively describes in this section how the various Priority Axis relate to the EUSDR strategy. It also addresses the approach how the consideration of EUSDR priorities should be observed when implementing this CBC Programme. | * A mechanism of mutual information and coordination mechanism between management bodies of EUSDR and this Programme should be taken into consideration. |
| **Implementing provisions for the cooperation programme** | |
| * Information on the relevant authorities is provided in this section. | * Further development/ adjustments of this section could be envisaged. |
| **Coordination** | |
| * This chapter describes what coordination between this OP and other (national) Programmes has been undertaken. | * Further development/ adjustments of this section could be envisaged. |
| **Reduction of administrative burden for beneficiaries** | |
| * The proposed actions are comprehensive and relevant. | * Further development/ adjustments of this section could be envisaged. |
| **Horizontal Principles** | |
| * The “Equality between men and women” principle is well described and the proposed arrangements will ensure the contribution to this principle. * The “Equal opportunities and non-discrimination” principle is well described and the proposed arrangements will ensure the contribution to this principle. * The horizontal principle of “Sustainable development” is considered in all steps of the elaboration of the Operational Programme, and will be followed in its implementation, by the managing authorities, beneficiaries and other stakeholders within the cross-border area. | * N/A |

## Table 2 - Conclusions and recommendations following 2nd Draft OP

| **Conclusions** | **Recommendations** |
| --- | --- |
| 1. **PROGRAMME STRATEGY** | |
| 1. **General remarks (Thematic concentration and the selection of the Thematic Objectives)** | |
| * The operational strategy is consistent, coherent and well presented; however, a few amendments and minor changes would enhance its justification and impact. * The operational strategy defines well the effective and efficient use of limited EU resources under the Romania - Bulgaria CBC draft Programme and reflects the development needs of the region. * The principle of thematic concentration has been respected, in line with the regulations. The low number of selected IPs shows clear efforts of concentrating the programme’s resources. * The chosen Thematic Objectives and Investment Priorities are in line with the Position papers and the Romania and Bulgaria Partnership Agreements. * The scope of each Priority Axis follows the national and EU priorities and is covered by the selected TO. * Priority Axes are well coherent with Europe 2020 Strategy goals. | * Slight revision of the strategic statement to be better in line with the analysis and the envisaged interventions. * Provide some analytical evidence regarding the needs in the fields of transport coordination, transport safety and mobility services and, a more accurate explanation of development needs in the field of “governance”. * Improvement of Justification chapter (OP Table 1):   **Priority Axis 1: A well connected region:**   * Arguments need to include that secondary/ tertiary nodes are not/not well enough connected to the TEN-T network.   **Priority Axis 2: A green region:**   * Arguments should stress how unique the cross-border assets are and how important is for the society and economy that these assets are exploited.   **Priority Axis 3: A safe region:**   * Reference that the CBC region is among those that have been identified of being most exposed to climate change effects is needed. Also, the text should provide, apart from reference to infrastructure losses, additional reference to human losses.   **Priority Axis 5: An effective region:**   * The cross-border dimension could be enhanced. The mentioned focus on cooperation *centred on funding opportunities* or the reference to *sustainable cross-border projects* is not further supported by the OP. |
| 1. **Assessment of coherence and consistency of the Operational Programme** | |
| 1. **Consistency of Programme objectives** | |
| * The specific objectives of the Programme and the related actions are in line with the EU 2020 Strategy and correlated with five out of seven Flagship initiatives covering the three priorities. * The chosen thematic objectives are well in line with CSF and the recommendations presented by the European Commission Position papers on the foreseen priorities for funding for each Member State (MS) at a National and a European Territorial Cooperation (ETC) level. They also well reflect the Draft Partnership Agreements (PA) for Romania and Bulgaria. * The Territorial Analysis results were well considered. Also, at National level, all chosen thematic objectives are relevant for both Romania and Bulgaria. | * N/A |
| 1. **Internal coherence of the Operational Programme** | |
| * The Programme answers the requirement for concentration of funds; the selection of Thematic Objectives/ Investment Priorities provide coverage of regionally relevant topics by the Programme and, the individual Investment Priorities / Specific Objectives are satisfactory interrelated and thus reasonable synergies between the support in the various areas can be generated. The Program interventions may result in good enough effect and impact. | * N/A |
| 1. **External coherence** | |
| * The current version of the Programme shows coherence with relevant EU and regional strategies and policies. * The RO-BG CBC Programme approach contributes to smart, sustainable and inclusive growth (the Programme contributes to five out of seven Flagship initiatives covering the three priorities of the EU 2020 Strategy). * The Programme contributes to seven Priority Areas of the four pillars of European Union Strategy of the Danube Region (EUSDR); among major challenges addressed through EUSDR pillars being Mobility, Environment, Risks and Socio-economic. * The chosen thematic objectives are well in line with the recommendations of the European Commission Position papers, with the Partnership Agreements and with the recommendations of the Common Provisions Regulation, Annex 1, article 7 that stipulates that programmes co-financed by the ESI Funds should promote, where appropriate, operations deriving from the macro-regional strategies, in order to support and enhance the implementation of their objectives. | * N/A |
| 1. **Intervention Logic** | |
| * Specific Investment Priorities (IP) have been selected among the pre-defined ones, Territorial Analysis results being well considered; in relation to each selected investment priority the Specific Objectives (SO) were well defined. * The Specific Objectives are well defined both in relation to the scope of the selected IP and the needs identified by the analysis. They are also correlated with the financial allocation. * The expected Results are coherent with the identified needs and contribute to achievement of Specific Objectives. * The outputs properly cover the envisaged actions and can help monitor and evaluate the progress toward results. * The majority of envisaged actions strongly contribute to the expected results. * The intervention logic shows coherence and the intended changes are likely to be achieved. However, the analysis reveals the need for few amendments. | **Intervention Logic IP 7b**   * Consider further refinement of the Specific Objective 1.1 in order to improve the measurability of the programme’s results. * The fourth result should be rephrased to better reflect the effect aimed to be achieved. * The third type of output should be rephrased to better reflect the intended output. * Target groups and beneficiaries: the population of the eligible area shall be included as benefiting from improved accessibility.   **Intervention Logic IP 7c**   * Consider slight re-phrasing the SO: it could be more specific by incorporating its focus on waterways and maritime transport; it could be reworded as “increased transport safety on waterways and maritime transport routes of the region”, as better supported by the proposed actions and the chosen result indicator. * Sea transport should be mentioned under the indicative actions as the Black Sea navigation is also concerned under this Specific Objective.   **Intervention Logic IP 6c**   * The result may be improved through reference to tourism improvement to better support the SO and not to narrow the scope of intervention.   To some extent the scope of interventions is wider than the result expected as the result is limited to only the emergence of a “*model*” for the joint protection and use of CBC heritage. A more ambitious result or results could even be justified, covering e.g. “increased contribution of the sustainable tourism sector to the cross-border region’s economy”.  **Intervention Logic IP 5b**   * Consider further improvement of wording of envisaged outputs.   **Intervention Logic IP 11iv**   * To formulate clear result(s) under section “Specific objectives corresponding to the investment priority and expected results, according to the specific objective”.   The way it is formulated this do not provide enough information regarding the success or failure of this part of the OP. Expected results can be like “increased number of operating cross-border network of public and private stakeholders”, “more effective cooperation within existing and new network”, “increased capabilities of regional public institutions to collaborate with each other across the border”.   * Re-consider the types of outputs list, to provide more direct reference to the immediate outcomes of the planned actions. |
| 1. **Horizontal principles** | |
| * The promotion of equality between men and women and, the arrangements to ensure the integration of the gender perspective and prevention of any discrimination at programme level and operation level are well described in SECTION 8 of the OP and the proposed arrangements will ensure the contribution to these principles. * Also the principle of “Sustainable development” is considered in all steps of the elaboration of the Operational Programme, and will be followed in its implementation. | * N/A |
| 1. **INDICATORS** | |
| 1. **Relevance of proposed programme indicators** | |
| * The result indicators are expected to measure the specific objectives and the most important envisaged changes. * Output indicators are relevant to the planned operations and are likely to contribute to the change in result indicators.   However, the analysis reveals the need for minor amendments. | * To adjust the wording of the indicators for PA 1 7b, PA 2 6d, PA 4 and PA 5 to better reflect the specific objectives and in accordance with measurement units and methodologies to establish baseline and target values. * More common output indicators may be defined, by adding to output indicator 5b.1 the two relevant COIs: Population benefiting from flood protection measures and Population benefiting from forest fire protection measures. * Adjust accordingly all references to indicators in the respective sections of the OP. * Consider adding an overview of expected results (e.g. in bullet points) at the end of each subsection „result to be achieved” to underline the intervention logic between specific objectives, expected results and result indicators. |
| 1. **Clarity of proposed programme indicators** | |
| * The data sources for result indicators have been identified. Their availability will depend on time and costs needed for surveys and statistics. | During OP 2014-2020 implementation   * In cases where the possibility of results being influenced by external factors apart from the Union intervention, these factors would need to be identified and their impact analysed when Interim-Final Programme evaluations will take place. * The Guidelines for Applicants need to give special attention to indicators: definitions of all indicators, description of methods for data collection, practical examples of their utilisation in Programme’s interventions. |
| 1. **Quantified baseline and target values** | |
| * Quantified baseline and targets are set for result and output indicators. * The proposed targets are likely to be accomplished. | * N/A |
| 1. **Suitability of milestones** | |
| * The established values for milestones (2018) and targets (2023) for proposed indicators are relevant and likely to be achieved. | * N/A |
| 1. **Administrative capacity, data collection and evaluation procedures** | |
| * The management and control system and the implementation structures, including monitoring and evaluation functions, are in place and functioning and, are adequate: * The structures in charge with monitoring and evaluation of the OP * The procedures to ensure timely and quality data collection for decision making, reporting and evaluation * The methodologies for data collection and processing for programme indicators * The procedures and guidelines to ensure the quality of data. * There is still room for improvements and thus a new electronic management system will be developed which will allow for better and timely monitoring of projects and Programme. | * If needed, when the 2014-2020 OP will enter into force, to update the procedures, methodologies, tools related to data collection, monitoring and evaluation. |
| 1. **CONFORMITY OF FINANCIAL ALLOCATION** | |
| * The financial allocations are in line with the recommendations in the CPR and ETC regulations regarding concentration of funds on identified challenges and needs. | * To fill the financial allocations in tables 15 and 16 in OP Section 3 – Financing plans.   To give further consideration to allocation of categories of intervention codes 102, 104 and 108. |
| 1. **CONTRIBUTION TO EUROPE 2020 STRATEGY** | |
| * The programme strategy combines seven Investments Priorities under five Priority Axis answering the identified common territorial needs and challenges and thus contributing to *smart* (Priority Axis 1, 2, 4 and 5), *sustainable* (Priority Axis 1, 2, 3 and 5) and inclusive (Priority Axis 4 and 5) *growth* through an integrated approach in order to address common territorial challenges. * The funding contributing to the „*inclusion*“ objectives (TO 8 and TO 11) is very small and the Programme strategy, as such, focuses on the preconditions to economic development (TO 7) and the environment (TO 5 and TO 6). * The approach is relevant. Complementarity can be observed through mitigating harmful effects of greater traffic by protective measures. | * N/A |
| 1. **Evaluation of other sections of OP** | |
| 1. **Evaluation of Priority Axis 6: Technical Assistance** | |
| * The proposed actions are consistent with the objective of the Priority Axis and the proposed indicators are likely to measure the progress toward its achievement. | * Rearrangement of the categories and actions to be supported. * Financial tables (12-14) to be filled in. |
| 1. **OP Section 4: Integrated approach to territorial development** | |
| * The section answer regulations requirements and, the OP provisions shows coherence with Partnership Agreements, corresponding Position Papers, EUSDR and other relevant strategies. | * Additional to the option to be chosen in accordance to the Annex 1 of the CPR, article 7, in order to support the implementation of MRS strategies, a mechanism of mutual information and coordination between management bodies of EUSDR and this Programme could be taken into consideration. |
| 1. **OP Section 5: Implementing provisions for the cooperation programme** | |
| * The chapter is drafted in compliance with ETC and CPR Regulations. | * Clarifications are needed regarding the body designated to be responsible for carrying out audit tasks and regarding the strategy/ functions of the Audit Authority that may be outsourced. * Reference should be made to observing the provisions in the European Code of conduct on partnership. * To present the involvement of the partners in the implementation of the cooperation Programme. * Reference should be made to observing the provision of CPR Article 5(3)(d) regarding conflict of interest related to involvement of partners in the preparation of calls for proposals, while being also project beneficiaries. |
| 1. **OP Section 6: Coordination** | |
| * The chapter is drafted in compliance with ETC and CPR Regulations and coordination with other relevant EC instruments is well presented. | * N/A |
| 1. **OP Section 7: Reduction of administrative burden for beneficiaries** | |
| * The proposed actions represent a step forward in reducing the administrative burden for the project beneficiaries. | * To set up deadlines for the proposed actions. |
| 1. **OP Section 8: Horizontal principles** | |
| * The horizontal principles are well described and the proposed arrangements will ensure the contribution to those principles. | * N/A |
| 1. **OP Section 9: Separate elements** | |
| * The chapter observes the Regulations provisions. | * N/A |

1. Key issues to be addressed: protection and sustainable use of regional natural and cultural assets and, prevention of environmental & climate change risks; improving accessibility; valorisation of the existing opportunities for joint business and of the complementarities in skills across the border; enhancement of joint governance mechanisms. [↑](#footnote-ref-2)
2. EUSDR major challenges: Mobility, Environment, Risks and Socio-economic. [↑](#footnote-ref-3)
3. It covers the linkages between supported actions, expected outputs and results and concludes assessing to what extent the expected change (or intended result) is likely to be achieved through operations delivering outputs. [↑](#footnote-ref-4)
4. The Programme contributes to five out of seven Flagship initiatives covering the three priorities of the EU 2020 Strategy. [↑](#footnote-ref-5)