

Draft Minutes

Eleventh meeting of the Monitoring Committee of Operational Programme
“Environment 2007 – 2013”

6 December 2011, RIU Pravetz Resort Hotel

The eleventh meeting of the Monitoring Committee of Operational Programme "Environment 2007-2013" was opened by Deputy Minister of Environment and Water and **Chairperson of the Committee - Mrs. Ivelina Vassileva**. She welcomed members, guests of the meeting, beneficiaries and representatives of the media.

Mrs. Ivelina Vassileva noted that last year was filled with lots of dynamic. She added that the OP "Environment 2007-2013" (OPE) is with sustainable, effective and efficient system for management and control (MCS), which is confirmed by all verifiers. Active work is being performed to achieve the goals of the programme and to service the beneficiaries, among which are Bulgarian municipalities, nongovernmental organizations (NGOs), regional branches of the Ministry of Environment and Water (MoEW) and the Ministry of Regional Development and Public Works (MRDPW).

At present under OPE are agreed contracts with amount of nearly EUR 895 million or almost 50% of programme budget, which shows 35% growth in comparison with the results reported in the previous meeting of the Monitoring Committee (MC) of the OPE, conducted six months ago. Payments currently represent 10.5% of the total budget, which shows an increase of 37% for the past six months. What is achieved is a result of many efforts, reform of the programme, the constant support from the representatives of the European Commission (EC), "National Fund" Directorate, The Executive Agency "Audit of the European Union Funds" and the beneficiaries.

The chairperson of the MC thanked for the efforts, the ambition and desire of the employees from both departments responsible for the OPE within the Ministry of Environment and Water, to prove that they can handle with the management of this hard OP.

Mrs. Vassileva gave the floor to the **Mayor of Pravets - Mr. Rumen Guninski**, who welcomed the audience. He noted that the environmental protection is a priority for the municipality and that key projects for the municipality are these concerning the water cycle and the waste management. Mr. Guninski expressed hope that the new programming period will provide more opportunities for smaller municipalities, such as Pravets, to implement projects on the environment. He ended with wishes for a successful and fruitful work.

Ms. Vassileva thanked Mr. Guninski, noting that a major concern for the programme is to provide all opportunities and to support the municipalities. She noted that for the big cities (over 10 000 p.e.) are announced two procedures, and one - for agglomerations from 2 000 to 10 000 P.E. The Chairperson added that continuous assistance is provided to the municipalities and it is being relied on their mobilization and awareness of the responsibilities of the local authorities within the project.

The word was given to the **governor of the Sofia region - Mr. Krasimir Zhivkov**. He welcomed the participants and determined Pravets as one of the most beautiful municipalities with traditions in the environment. Mr. Zhivkov added that this meeting is held in one of the

most successful regions in the implementation of separate projects, including such in OPE and that Pravets Municipality has won the prize "Green Municipality" in 2009. He gave several examples of successful projects under the programme implemented in the region under each of the main priorities of the OPE. This creates prerequisites for transforming the area into a tourist centre at world level. He noted that environmental protection is a priority for Sofia region. Mr. Zhivkov, thanked the hosts of Pravets and wished them fruitful work.

The chairperson of the MC thanked Mr. Zhivkov, confirming that many of the projects in the field could be showed as good examples. She thanked the children from the eco-club in the Vedrare village for the wonderful gifts which are a beautiful example for utilization of waste products. *(Gifts made of used materials by kids, part of eco-club in Vedrare village, were given to all attendees)*

Ms. Vassileva gave the floor to the **representative of DG "Regional Policy" - Mr. Renaldo Mandmets**. He began by saying that he usually tries to maintain the balance between good and bad news in his statements, but this time the good news are more than the bad ones. He noted the clear improvement in the Management and Control Systems of the Managing Authority (MA) and the Intermediate Body (IB) of the OPE, found by his colleagues, and confirmed by audit institutions at European level. It was mentioned the negative impact of the poor selection criteria for the first procedures announced, as a result of which, are provided too expensive proposals. In the opinion of Mr. Mandmets the Ministry has taken note of the mistakes made in the past. He congratulated the MA for the results achieved so far and expressed his confidence on accelerating the progress of the program. The Commission's main concern is the delay of physical and financial progress. Mr. Mandmets noted that sanctions under the rule "N+3" in 2012 can be avoided with good financial planning of Major projects, which will reduce the risks for 2013. The representative of DG "Regional Policy" noted that he is aware of signs of progress in solving the water sector issues. Mr. Mandmets urged to start planning for the next programming period, which is a prerequisite for it to be successful. He believes it is time to start planning the Major projects for the next programming period. The representative of the Commission gave an advise - to learn from other Member States on the new areas of funding, one of which is air pollution. He drew attention to the audit findings of European Court of Auditors, which affect not only violations in the conduct of public procurement procedures, but also breaches in the national eligibility rules, which should be simplified. In conclusion, he wished success in compensating the physical and financial delay in the program.

Ms. Vassileva thanked Mr. Mandmets and noted that the main goal of the program for 2012 is speeding implementation in order to avoid risks for 2013. The chairperson of the MC noted that in this aspect she will rely on partners from JASPERS, which by now are giving invaluable support. She added that an active process of programming is going on and that the institutional framework for management of EU funds is being outlined. Negotiations for signing a partnership agreement with the EC are being led. Ms. Vassileva ended the official part of the meeting and opened the working one.

The Chairperson announced the availability of a quorum and proceed to the first item on the agenda - vote on the **Minutes of the tenth meeting of the MC of OPE**. Document was approved unanimously by the members of the MC.

Ms. Vassileva gave the floor to **Ms. Azhda Yusein, Senior expert in MA, to present the Progress in the implementation of OPE**. She presented the overall progress of the program and the progress, made under the priority axes.

Ms. Vassileva thanked for the presentation and gave the floor to **Mr. Valeri Natan, a representative of DG "Regional Policy", European Commission**. He noted the putting in

operation of the first projects funded by OPE, and the progress of other major projects, such as the one for management of the wastes in Sofia municipality - Phase I. Mr. Natan drew attention to the significant raise of the capacity of the MA and IB of OPE and the effective Management and Control Systems. He hailed the very active consultations conducted by the MA and noted the excellent communication with the colleagues from the Ministry. The number of projects that are under evaluation and preparation give confidence for compensating the delays.

Mr. Natan noted some challenges that are facing the programme, regarding the rule of "N+2, N+3" - many of the approved projects are actually not sufficiently mature and are far from the stage of physical implementation, whereas the payment targets to be achieved by 2013 are quite high. Mr. Natan said that the Commission sees a necessity for acceleration of the absorption of the funds. Among the reasons for the delays are the slow execution of the public procurement procedures by municipalities, the delay in the evaluation of project proposals and also non-compliance with the recommendations, given by experts during consultations with the beneficiaries. Mr. Natan drew attention to the unfinished reform in the water sector and the lack of a functioning framework in the field, which are essential conditions for accomplishing successful projects. In conclusion, Mr. Natan again congratulated MA for the results so far and expressed his hope that at the end of the programming period they will be a lot better.

Ms. Vassileva thanked for the comments and for the risks identified. She noted that several measures have been taken in the problematic areas by the MA, with the support and personal commitment of Minister Karadzhova.

Ms. Vassileva said that in connection with the evaluation of proposals was held a big meeting with the municipalities, who have projects under evaluation and also reminded that the recommendations of the expert working group should be complied, because the opposite could lead to the rejection of the project proposal. Such meeting is foreseen for December 15 2011 with the participation of Minister Nona Karadzhova and all municipalities which implement projects under the so-called "combined" procedure ("Preparation and implementation of projects to improve and develop the infrastructure for water and wastewater in agglomerations with over 10 000 P.E." - BG161PO005/10/1.11/03/19). No compromises will be made and there will be termination of contracts, if necessary. "Booking" resources from municipalities which are irresponsible to implement their projects will not be allowed. It will be relied on the support of the National Association of Municipalities to make the information more clear for the municipalities. Active consultation for the beneficiaries at all stages of projects will continue.

Regarding delays concerning the public procurement procedures, it is being considered, signing contracts with municipalities earlier - at the stage when the scope of the project is clearly defined. In that case the beneficiaries will have time for preparation of tender documentation. Regarding problems in the water sector, MRDPW is seriously committed with the reform. Almost every week meetings with representatives of the Ministry of regional development and public works and representatives of other related ministries are hold. Deputy Minister Vassileva said she hopes to have an approved concept in the field soon, confirmed by Council of Ministers and National Assembly of Bulgaria.

The floor for comments was given to the representative of the **Foundation "BlueLink" Mrs. Katerina Rakovska**, who drew attention to two recently announced procedures in "Biodiversity" sector, with total amount of EUR 63,4 million. She noted that with that amount, the resources under priority axis 3 will be spent. According to Mrs. Rakovska, this shows that a very small part of the funds in the sector are provided to activities related to

"Natura 2000" - about 1/4, while the rest are focused on protected areas - national parks and natural reserves, which cover only 5% of the country. "Natura 2000", in turn, covers 34%, indicating an imbalance. Ms. Rakovska questioned whether this means that no more funding will be provided on a competitive basis, because both procedures are on the principle of direct provision.

Ms. Rakovska asked how will be ensured the efficiency of absorption, taking into account that for national parks and reserves will be provided EUR 15 million per year for three years. Until now national parks and reserves have managed about half a million euro annually. She drew attention to the strict nature reserves, where not much activities are allowed.

Word for response was given to the **Head of the MA of OPE - Ms. Malina Kroumova**, who explained that the budgets of the procedures are based on activities in their management plans, mainly for the parks. The activities in the reserves are quite limited, but they are necessary to ensure their proper management. She explained that the amounts announced until this moment can not be regarded as spent. Only when the contracts are signed we could say that the funds under Axis 3 have been spent. When the values of these contracts and the procedures announced in the sector are summed, the result really closes the axis 3 budget amount. It is expected that the resources will be spent effectively, because the activities are included in the management plans of the parks. The fact that they did not have much money so far, does not mean that they do not have a lot of needs. Ms. Kroumova noted that protected areas are part of Natura 2000, and many of the activities in the two new procedures cover a large part of the state obligations on the protection of habitats and species (implementation of the Habitats Directive) and there are activities that cover the objectives of Natura 2000. Delayed implementation of activities under "Natura 2000" is probably due to the delay in the mapping of the areas on it. When mapping project is completed, there will be put efforts in this direction, or at least for the management plans for protected areas, because it is a main indicator of the procedure and because it is necessary to develop accurate measures. Ms. Kroumova noted that it will be relied on NGOs as contractors and "generators" of ideas. This is possible because the call requirements are flexible. There is flexibility also in using resource that could be withdrawn, if there is absence of absorption capacity. The competitive principle is not crossed, and the resource is not exhausted.

Mrs. Vassileva pointed that the projects in the sector are implemented in short terms, they are easily monitored, they generate savings in the implementation process and added that a goal of all of as is to fully absorb the resources available. If there are resources left, new procedures will be launched. Due to the short design cycle, it is possible procedures to be launched in 2012 and 2013.

The floor was given for comment to **Mr. Kremlis, representative of DG "Environment"**. He also noted the progress of the program and pointed some issues in sectors "Waste" and "Waste water". He stressed that all new projects must comply with the new Waste Framework Directive. It does not provide deadlines for the new management plans. In this respect is better Bulgaria to start working on new national and regional management plans. Whatever is done in the sector, it should be included in the management plan. The plans for waste management should be ready by 2013. The projects for regional systems for waste management are not in accordance with the new directive and they will not be, unless additional pre-treatment of biodegradable waste is provided in order biodegradable waste not to reach landfill. He noted that in the EC took place an active discussion about not co-financing landfills, but more complex waste systems, which will require more financial resources than these that Bulgaria has in this operational program.

Mr. Kremlis noted that the key projects in the Water sector should be considered in the plans for river basin management. Although in the current programming period art. 9 of the Water

Framework Directive for forming the price of water is not conditionality, when applying a project, cost-benefit analysis must show the methodology used for the formation of the cost recovery of the water project. This should be taken into account when programming the next programming period. If Bulgaria now satisfies most of its needs, in order to respond to directives and identify what should be done in the future, it will be in a better position in the next programming period by the contract negotiations for partnership with the EC. DG "Environment" is on the opinion that Bulgaria needs a lot more resources than it has and will get in order to fully respond the requirements in the environment field.

Mr. Kremlis appealed for early defining of all the national needs in order to cover all the requirements of the Habitats Directive under NATURA 2000 in order to insist for appropriate funding with clearly defined needs on national and EU level. The legal requirements for construction of environmental infrastructure should be defined and this way the need of funding should not to be a point of discussion. Such requirements are available for the "Water", "Waste water" "Waste", "Drinking water" sector and also in Art. 8 of the Habitats directive.

The representative of DG "Environment" reminded that it should be taken into account also that resources for improving the urban environment will be provided for the next programming period. He highlighted that the Ministry, responsible for environment in Bulgaria, is also responsible for climate. So this area should also be considered in determining the needs of financial resources in relation to the objectives in improve the climate.

Mr. Kremlis pointed out as a general problem for the new Member States, the great responsibility which mayors bear because they have to fulfil the requirements of three important directives - in the "Water", "Waste water" and "Freshwater" areas. They also should be partly included in fulfilling the requirements of the Habitats Directive by preparation of management plans, but often then do not have all the necessary resources available. He expressed his hopes that there will be discussed new structures which will assist municipalities in the next programming period. Mr. Kremlis wished success and shared Commission's hope for more good news at the next meeting.

Mrs. Vassileva thanked Mr. Kremlis and DG "Environment" as a whole for the intensive communication and partnership.

The floor for comment was given to **Mr. Botyo Tabakov, a representative of the Bulgarian Mining Chamber**. He shared his concern about the infrastructure for waste management which is built in accordance with the Bulgarian legislation, but at a later stage, when the requirements are changed, the newly built facilities will not comply with the revised regulations.

Mrs. Vassileva explained that the objective of the financing in the current programming period is providing basic infrastructure, and in some regions - pre-treatment of waste. It is being relied on municipalities to comply with the law and on the businesses in the field, examples of which are already there.

Mrs. Kroumova added that the focus now is on building landfills, because this is the least attractive feature for business and that in any kind of waste processing quantities for disposal are generated. This does not cancel the commitments of the municipalities. Gradually economic incentives are introduced in the legislation in order to reduce the flow of waste to landfills.

Mr. Kremlis agreed with Ms. Vassileva and Mrs. Kroumova and confirmed that the new requirements should be respected. Landfills remain the last option and other ways for reuse should be sought. He explained that the objectives should be achieved at national level, which

does not mean that each installation must cover them separately. Therefore, development of waste management plans is so important.

Floor to provide a **justification for the need of changes in the waste management mechanism was given to the Head of the MA of OPE - Mrs. Malina Kroumova**. She presented the status of the priority axis. Mrs. Kroumova noted that there are savings, generated from completed TA projects. There are also six suspended projects, which together sets free about 20% of the procedure budget. The projects in implementation and evaluation together worth EUR 365 million. Five projects are approved and 14 are under evaluation. The application of the last four projects is expected.

The head of the MA drew the attention to the eligibility of VAT. VAT is eligible if it can not be recovered according the VAT Act (VATA). This depends on 1) whether the beneficiary is registered according to the VATA and 2) the type of subsequent facilities management.

All municipalities are VAT registered. If the waste management is financed entirely by local taxes, VAT is eligible (refundable by the OP). If subsequent operation is provided under the Concessions Act, VAT is not eligible for funding (non-refundable by the OP) under the OPE. Most of the present projects foreseen delegation of infrastructure management according to the Public Procurement Act (PPA) to an operator, who will not rent the infrastructure, but will operate it.

Remains the question whether in the process of constructing VAT will become recoverable according VATA, which would make it inadmissible under the OPE. This would set free resources for the program. The reserved resource under priority axis 2 is EUR 382 million and the total value of the priority axis is about EUR 367 million, leading to about EUR 15 million shortfall. On the basis of the intentions that certain municipalities will not use the mass management type, it is expected about 10-20% release of resources from recoverable VAT. Based on project experience are calculated the prognosticated savings, generated during project implementation and by imposition of financial corrections. This leads to release of resource about EUR 74-129 million. In order to prevent the loss of resources for the priority axis and because of the lack of funding for closure of the illegal or non-compliant landfills, comes this amend proposal. The goal is part of this resource to support the closure of these landfills. As listed in Council of Ministers Decree (Decree) № 209, there are 61 such sites and 43, totalling about EUR 24 million, do not have a financing source. The proposal is the recultivation of these 43 stores to be eligible for financing under OPE, along with other facilities, which projects are expected be prepared by municipalities.

Upon completion of the TA projects were identified such that provide the development and completion of RSWM, including separation and composting facilities. The second amendment of the waste management mechanism is these activities also to become eligible under the OPE.

Ms. Krumova drew attention to the effectiveness of projects in the sector, providing average price per tonne of waste projects.

Mr. Valeri Natan supported the proposed changes. He asked whether there will be new eligibility criteria in this regard or the ones in place will be applied also to the new areas covered by the modifications in the mechanism. He proposed that when it becomes clear which projects will be funded as a result of the proposed modifications, they should be presented to the MC.

Mrs. Kroumova confirmed that the list will be provided as soon as it is ready. It is envisaged that the criteria will be the same, unless there is an unpredicted change.

Mr. Kremlis noted that the closure of old landfills is a key priority and if it comes to illegal landfills that are closed and do not accept waste, DG "Environment" accepts the proposal. He asked further, how will be planned the construction of the delayed projects during this period, how is this planned in the next programming period and how will introduce the recovery technologies.

Mrs. Kroumova confirmed that just about non-functioning landfills in areas with regional waste systems, complying with the requirements of the Directive. About projects that can not be financed under the OP, the work will continue. Most of the projects provide second and third phase, given that the first phase consists of construction of basic infrastructure.

The floor for comments was given to the representative of the **National Association of Municipalities in Bulgaria (NAMB) - Mrs. Desislava Stoykova**. She noted the general support of the organization for the amendment of the waste management mechanism, but expressed concern that the national funding acc. Decree № 209 is definitively excluded as a possibility. Ms. Stoykova offered the NAMB assistance for the four regional systems left. She added that NAMB has submitted its request, the change of the Public Procurement Law (PPL) to come into force as soon as possible. She appealed for coordination at national level between the managing authorities of the operational programs.

Mrs. Vassileva explained that the national funding, pursuant to Decree № 209, is not drawn out. She expressed her hope that the amendments to the PPL will assist the beneficiaries and will standardize practices, which is also expected after the devolvement of the preliminary procurement documentation control to the Public Procurement Agency. Beneficiaries under OPE will be promptly informed in consultations and information days for changes in the PPA, in order to avoid delays that might arise from the change. The Chairperson noted that there is a reduction of errors in the procurements due to the overall experience gained in the municipalities and to the work of the MA and IB of OPE and EU Funds Executive Agency.

The floor for comments was given to **Mrs. Iliana Pavlova, a representative of the Bulgarian Industrial Association**. She raised the issue of building a facility for disposal and processing of hazardous waste, because there are large waste quantities accumulated in the companies. She also asked about the funding opportunities under the OPE.

Mrs. Vassileva noted that the issue for allocation of funds for waste streams, other than communal, was opened by Mr. Kremlis. No readiness in this field is declared in front of the Ministry. The Ministry is working very actively in the implementation of the Swiss program, performing the role of Intermediate Body. Through the Enterprise for management of environmental protection activities (EMEPA) will be fulfilled a massive project, already approved by the Swiss partners, for collection of hazardous waste in the country and its adequate treatment. Not excluded is the possibility the business to undertake initiatives that can be supported by other programs and funds.

The floor for comment was given to **Mr. Botyo Tabakov**, who supported the amendments and asked question, concerning mining waste. He proposed remediation of high-risk facilities to be considered, for which the state companies "Ekoinzhenering Ltd" and "Eco Medet" LTD are ready.

Mrs. Vassileva noted that in the current programming period, the efforts are focused on communal waste and that it matters who is the owner of the waste, as to be a beneficiary. The Chairperson declared her willingness to hold talks on the subject in connection with the ongoing programming of the next programming period. In the absence of other comments, she proposed amendments in the Mechanism to be approved by voting.

The document was approved unanimously by the members of the MC.

Chairperson announced a short coffee break.

After the break the projects of two beneficiaries, funded and successfully implemented under OPE were presented.

The first project - for building a "Regional system for waste management in Botevgrad, Pravets and Etropole regions" was presented by the Deputy Mayor of Botevgrad - Mr. Valentin Tzenev. The grant contract was signed in November 2010, construction have started in December 2010. Investment costs are over EUR 8.9 million, nearly EUR 7.4 million are provided by the OPE. The construction is completed an year ahead of schedule, at the end of 2011.

Mrs. Vassileva thanked Mr. Tzenev and congratulated municipalities for their efforts and results.

The word was given to Mrs. Maya Radeva, Director of Natural Park (NP) "Bulgarka" to present projects, managed by the park. Mrs. Radeva presented the projects "Restoration of habitat and biodiversity within the NP "Bulgarka" and "Development of a management plan for the NP "Bulgarian". The attendees were made familiar with the basic activities, funded under the projects, as well as the difficulties encountered during implementation: preliminary control delay, delay in follow-up verification of the requests for reimbursement, lack of direct contact and direct communication with pre- and post control and lack of practical experience and understanding of project activities from the experts.

Mrs. Vassileva thanked for the presentation, determined the sharing of difficulties as appropriate and noted that soon a meeting with national and natural parks is going to be held, where these issues could be discussed.

The floor was given to the **Head of Intermediate Body of OPE - Mrs. Yoana Hristova.** She noted that measures are already taken and preliminary control already is not required of all activities. Also in the "new" contracts is set the term of maximum one month for accomplishing the preliminary control. There has been progress in the regulation of changes in project budgets.

Mrs. Vassileva undertook the commitment to discuss the problems at highest management level.

Mr. Natan took the floor to congratulate the representatives of Botevgrad municipality and Natural Park "Bulgarka" and made a wish, at the next meetings, only such presentations of successful projects to be seen.

Chairperson Mrs. Ivelina Vassileva thanked the committee members and closed the Eleventh meeting of the MC.

List of Participants

Members and alternates of the Monitoring Committee:

1. Ms. Ivelina Vassileva - Chairperson of the Monitoring Committee Deputy Minister of Environment and Water
2. Ms. Malina Kroumova - Head of Managing Authority of OP "Environment", Ministry of Environment and Water
3. Mrs. Yoana Hristova - Director of "EU Funds for Environment", Ministry of Environment and Water
4. Anitsa Ruseva - Ministry of Regional Development and Public Works.
5. Mustafa Chaushov - Ministry of Economy and Energy
6. Iva Yakimova - Tourism Policy Directorate, Ministry of Economy and Energy
7. Ms. Nadya Genova - Council of Ministers, Central Coordination Unit.
8. Ms. Dennitsa Nedeva - Council of Ministers, "Coordination of EU Affairs"
9. Ms. Ivete Baeva - Council of Ministers, "Economic and social policy."
10. Ms. Snezhana Smilovska - Council of Ministers, "Monitoring of EU Funds".
11. Ms. Galya Ivanova - OP "Technical Assistance", Council of Ministers
12. Mr. Plamen Girginov - MLSP
13. Mr. Philip Krumov - Ministry of Finance, "OP" Administrative Capacity"
14. Ms. Krasimir Avramov - Executive Environment Agency
15. Ms. Lyubka Lazarova - Executive Agency for Fisheries and Aquaculture.
16. Mr. Kiril Tashev - Executive Agency of Forestry.
17. Ms. Iliana Lazarova - Ministry of Finance, "Economic and Financial Policy"
18. Mr. Georgi Ivanov - MoEW, "Management of Water" Department
19. Mrs. Teodora Zheleva - MoEW, "Management of waste" Department
20. Mr. Michaela Lyutzkanova – MoEW, Directorate "Environmental Policy".
21. Mr. Tsvetan Tsankov - Ministry of Interior, General Directorate "Criminal Police"
22. Mr. Petar Petrov - National Statistics Institute.
23. Ms. Desislava Stoykova - National Association of Municipalities in Bulgaria
24. Mr. Plamen Stefanov - Regional Development Council of the North-West planning region
25. Ms. Ralitsa Todorova - Regional Development Council of Northeastern Planning Region
26. Ms. Irena Petkova - Regional Development Council of the planning region
27. Mr. Emil Dimitrov - Confederation of Independent Trade Unions in Bulgaria.
28. Mr. Nikolay Sidjimov - Association of Municipal Environmental Experts in Bulgaria.
29. Mr. Botyo Tabakov - Bulgarian Mining Chamber.

30. Ms. Iliana Pavlova - Bulgarian Industrial Association.

31. Ms. Juliana Yankova - Confederation of Employers and Industrialists in Bulgaria.

Observers in the Monitoring Committee:

32. Mr. Georges Kremlis - DG "Environment"

33. Mr. Valeri Natan - DG "Regional Policy"

34. Mr. Renaldo Mandmets - DG "Regional Policy"

35. Ms. Irina Vanghele - DG "Regional Policy"

36. Mr. Ralph Aimar - European Investment Bank, Initiative "Jaspers"

37. Mr. Kevin Mowffort - European Investment Bank, Initiative "Jaspers"

38. Ms. Nadejda Byanova - Ministry of Finance, "National Fund"

39. Mr. Radoslav Nedyalkov - Ministry of Finance, "Audit of EU Funds"

40. Ms. Katerina Rakovska - Foundation "BlueLink"

41. Mr. Doncho Ivanov - Coalition for Sustainable Development

APPROVED BY

IVELINA VASSILEVA

DEPUTY MINISTER AND CHAIRPERSON OF MC OF OPE