



MINISTRY OF REGIONAL DEVELOPMENT
AND PUBLIC ADMINISTRATION



ROMANIA - BULGARIA

Interreg



MINISTRY OF REGIONAL
DEVELOPMENT AND
PUBLIC WORKS



DECISION no. ¹⁹...
of ^{2nd}... of May 2018

Regarding the complaints lodged against the Monitoring Committee Decision no. 72 of 22nd of March 2018, approving the List of approved and rejected projects submitted under the third call for proposals for the Interreg V-A Romania-Bulgaria Programme - deadline 23rd of October 2017

Having regard to the following:

- Monitoring Committee Decision no. 51 of 2nd of August 2017 approving the Complaint Panel for the Eols and full applications submitted under the 3rd call for proposals, priority axes 1-3, Interreg V-A Romania-Bulgaria Programme, step 1 and 2,
- The Complaint Procedure of Interreg V-A Romania-Bulgaria,

the Complaint Panel of Interreg V-A Romania-Bulgaria Programme has adopted this:

DECISION

Article 1. The present document partially accepts the complaint lodged by the National Association Legal Initiative for Open Government, lead beneficiary of the project "On the fiber tracks in the CBC region" - code 534, registered by CBC ROC with the number 6441/03.04.2019, appealing the score received at technical and financial evaluation. One extra point was granted by the Complaint Panel, therefore the final score is of 53 points, still insufficient to be proposed for financing.

Article 2. The applicant provided a self-assessment of the application, requesting 99 points vs 52 actually received:

- a) For Q (criterion) 2, 4, 6, 11 and 13 the score granted and the one in self-assessment is identical.
- b) Q 1 - 2 points (maximum) in self-assessment vs. 1 points granted. The project contributes to the Danube Strategy, but a contribution to Europe 2020 in terms of employment could not be recognized, considering the project does not include training/other support in entrepreneurship or business development, but teaching

tourists how to craft carpets (an increase of 300 visits is envisaged). Therefore, the Complaint Panel maintains the score.

- c) Q 3 - 1 point (maximum) in self-assessments vs. 0.5 points granted. The assessors recognized the two previously financed projects, but since the synergies with the current project were not highlighted, as it was requested, the score was of only 0.5 points. Therefore, the Complaint Panel maintains the score.
- d) Q 5 - 2 points (maximum) in self-assessment vs. 0 points granted. The Complaint Panel maintains the score granted considering the large number of prints the project proposes (the applicant proposes to print on paper every single research, analytical or planning document developed within the project, including the research and analysis developed in W1 in 200 copies (although it will be available on the website and its main scope is to serve as basis for the development of the other activities in the project), the Marketing Strategy (in 400 copies) and the Joint Strategy (in 400 copies). Furthermore the survey to be done as part of the research in WP is planned to be done through questionnaires printed in 1000 copies). Under these circumstances, it cannot be argued that the project "uses minimum paper resources".
- e) Q 7 - 2 points (maximum) in self-assessment vs. 1 point granted. 2 points were to be granted for strong cross border impact (a wider joint problem tackled with a joint solution which brings benefit to the border area). The information in the application form and in the complaint states that the project is indeed cross-border, fact not argued and already established. The extra 2 points were to be granted only in the conditions mentioned above, which are not met, since the project deals with the forgotten ancient tradition of weaving and its promotion as tourist attraction (by few workshops, trips and festivals in both countries). Therefore, the Complaint Panel rejects the complaint for this criterion.
- f) Q 8 - 1 point (maximum) in self-assessment vs. 0 points granted. Since no specific measure was indicated, as requested in order to obtain the point, the score granted is maintained by the Complaint Panel.
- g) Q 9 - 1 point (maximum) in self-assessment vs. 0 points granted. Since no specific measure was indicated (the expectancy of the applicants of 40% women participants cannot be considered one), as requested in order to obtain the point, the score granted is maintained by the Complaint Panel.
- h) Q 10 - 1 point (maximum) in self-assessment vs. 0 points granted. Since no specific measure was indicated, as requested in order to obtain the point, the score granted is maintained by the Complaint Panel. Also, as mentioned above, the project plans to print a large number of documents, therefore, it cannot be argued that it "uses minimum paper resources".
- i) Q 12 - 2 point in self-assessment (maximum) vs. 1 point granted. The Complaint lodged by the Lead Beneficiary states that all beneficiaries have experience, but the affirmation is not grounded on the data in the application form (Beneficiary 2

has no experience in the addressed field). Therefore, the complaint for this criterion is rejected.

- j) Q 14 - 15 points (maximum) in self-assessment vs. 6.5 points granted. The problems and needs are not properly presented, they are described in very general terms, with no indication of the target region or providing any concrete data or evidence to back up the arguments for the existence and potential for revival of the carpet weaving tradition and its reinventing in a lucrative tourism product. Also, the scope and impact of project activities although logically linked to the proposed objectives may prove insufficient for its accomplishment. According to the approved AF, the overall objective of the project is to improve the sustainable use of cultural heritage of the CBC region through promotion of intangible cultural heritage in the area of crafts and art traditions and to take measures to create an integrated tourism product - fiber tracks.[...] This objective will provide the CBC region with increase in economic and touristic aspect keeping the traditions in carpets art live for the generations. At the same time, the project proposes to contribute with only 300 tourist overnights, of which, as per clarifications provided during the Eol assessment, only 65 are actually tourists and the rest are direct participants in the project events. Such a result cannot be reasonably expected to effectively bring any change in tourism development and economic terms. The Applicant claims that "The project will provide the tourism sector with appropriate concept for development and recreation of the arts and crafts of the CB region and opportunities to the tourists to get acquainted to the ancient traditions of carpet weaving characteristic of the region." However, the activities do not envisage any dedicated measures targeting, the tourism sector, including tour operators, tourism agencies and tourism businesses, that would ensure the inclusion of the product in the tourism offer and its focused promotion to a wider tourist audience. In a similar manner, the Applicant suggests that "The local authorities need to launch strategies and encourage practices consisting of green solutions and innovative approaches for development and restore of the ancient traditions, the tourist attractions and the marketing policy in the region in order to make steps for preservation of all traditional customs and values characteristic of the region." While the planned Marketing Strategy and Joint strategy for establishment of new brand of tourist destination in the trans-border region directly address this need, the project does not involve the local authorities in the development of these strategies, thus failing to ensure any mechanisms for the actual implementation of those strategies, their adoption or take-over by the local authorities in the region and other tourism stakeholders. Another discrepancy between proposed results and planned resources is related to the project's consistently selling the entrepreneurial potential of the carpet weaving tradition (The implementation of the project goals will unleash the high potential of carpet weaving to lower the unemployment in the region by encouraging more new entrepreneurs to accept the challenge of arts and crafts reviving by converting it to business.), but does not propose any dedicated

measure in this sense (e.g. entrepreneurship training or other alternative actions). Under these circumstances the logical link between problems, objectives, resources, activities, outputs and results can be assessed as relatively weak, thus the scoring remains as granted.

- k) Q15 - 15 points (maximum) in self-assessment vs. 7.5 points granted. From the considerations mentioned above as well as other discrepancies and deficiencies identified in the application form (eg. radio broadcasts are mentioned in description of activities but not in deliverables section, the vast majority of activities is outsourced to a single provided - promotion, ensuring trainers, accommodation, tents, stands, weaving materials etc - thus the applicants have limited role and hence control on the actual project implementation), the complaint for this criterion is rejected.
- l) Q16 - 5 points (maximum) in self-assessment vs. 3 points granted. Activity A.M.3 "Development of Tender Procedures", which according to the description includes elaboration of the tender documentations, and participation in the announcement, evaluation and awarding of all contracts for services and promotion and visibility activities is planned to be completed by the end of June 2018. WP 1 Research and analysis of the preserved traditional carpet weaving is proposed to provide results that will be used for "planning and integration of all implementation activities and the tourism product to be developed" and to "suggest more specific focus and scope of the planned website, workshops, roundtrips and festivals". This means that the finalization of WP1 is a prerequisite for the preparation of the Terms of reference for the related services. However WP 1 is planned to be finalized by the end of July 2018 (the research part) and by the end of November 2018 (the analysis part). Thus, either the contracts for the rest of the services will be awarded without using the results of the research and analysis of WP1, or the development of the tender procedures must be rescheduled. Considering the abovementioned, the score is grounded and maintained.
- m) Q17 - 2 points (maximum) in self-assessment vs. 1 point granted. The Complaint Panel considers the information and publicity measures foreseen as sufficient for the dissemination of the project to the target groups (website, leaflets, posters, billboards, banners, promotional materials, 2 press conferences, 4 press releases) and grants 2 points for this criterion.
- n) Q18 - 2 points (maximum) in self-assessment vs. 1 point granted. Part of the planned promotional materials, such as the proposed 2500 posters of which 1000 for dissemination at workshops and festivals significantly, exceed the proposed 350 target groups representative planned to attend the events. In addition the posters are traditionally meant to be posted (rather than handed over) so as to attract the interest of passersby. Similarly the planned 200 printed copies of the analysis within WP1, 400 printed copies of the Marketing Strategy and 400 printed copies of the Joint Strategy to be disseminated among relevant stakeholders

significantly exceed the number of the target groups defined in the dedicated section of the application form. Therefore, not all of the actions are necessary and proportionate to the activities as a whole. The Complaint Panel maintains the granted score.

- o) Q19 - 10 points (maximum) in self-assessment vs. 3 point granted. The project aims at reviving the ancient tradition of carpet weaning. However, the target groups are quite reduced. Therefore, it cannot be argued that with the limited intervention of this project the ancient tradition of carpet weaning will be revived, considering also the fact that in the application plan there is no clear data on the involvement of public authorities in the process (the stakeholders who would be able to implement a strategy/plan of reviving this tradition). Therefore, the score is maintained.
- p) Q 20 - 3 points (maximum) in self-assessment vs. 2 point granted. The complaint does not argue in any way the maximum score. Considering all of the abovementioned, the score is maintained, the target groups are not fully correlated with the proposed activities.
- q) Q 21 - 3 points (maximum) in self-assessment vs. 2 point granted. The complaint does not argue in any way the maximum score. Considering all of the abovementioned, the score is maintained, the target groups are not fully correlated with the proposed activities.
- r) Q 22 - 2 points (maximum) in self-assessment vs. 0 points granted. The AF expressly requests the description of "concrete measures (including institutional structures, financial resources etc.) taken during and after project implementation to ensure and/or strengthen the durability of the project outputs and results". The Applicant addresses the project sustainability in very general manner, mostly in terms of promoting the importance of intangible cultural heritage, rather than in terms of continuity and durability of the project outputs and results. The plans for the sustainability of the project outputs and results is based on external factors, such as the municipalities, which are supposed to take over the proposed measures from the strategy, or the schools art and craft clubs or museum, which will be given the created arts and crafts under the project. Although targeted as the prospective users, the municipalities are not planned to be actually involved in the development of the strategies within WP3 and therefore the plans for them taking-over and using the developed strategies as a policy making and tourism development tool cannot be certain. The other important target groups and stakeholders in the development of cultural tourism, namely the tour operators, tourism agencies and tourism businesses, that would be able to take over the integrated tourism product and include it in the tourism offer so that it reaches the widest possible public, are missing from the description of the project activities. Therefore, the score is maintained by the Complaint Panel.

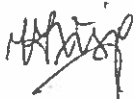
- Q23 - 15 points (maximum to be granted for full correlation between activities and budget and the budget is very well justified) in self-assessment vs. 7.5 points granted. The following deficiencies were identified in terms of budget:
 - The beneficiaries did not use the ceiling for procurement consultancy without offering a justification, and instead proposed a significant amount supported by 3 offers. In the case of the LB the total amount for elaboration of tender procedures (24250 euro) represents 17% of the total direct costs of the LB, while one of the price offers submitted is provided by a company "National Consultant in Public Procurements", in which the legal representative of the LB Eva RADEVA is a shareholding partner;
 - The case is similar with the website development. The LB did not use the ceiling provided in Annex D without offering a justification and instead provides 3 offers for an amount which is more than 4 times higher than the ceiling price. Again, one of the offers is provided by a company "Modern Strategies and Knowledge" LLC, in which the legal representative of the LB Eva RADEVA is again shareholding partner;
 - The price offers for the festivals and workshops provide a global price, without a breakdown per individual components and no quantification of the component services (hours of training, type and quantity of weaving materials, type and quantity of weaving equipment, etc.), therefore their justification was not available in the application form.
- Therefore, the granted score is maintained.

Article 3. The decision of the Complaint Panel is final, binding to all parties and not subject of any further complaint proceedings within the Programme.

Signed by

Members of the Complaint Panel

Signature



Member 1 - Managing Authority representative, Ministry of Regional Development and Public Administration, Romania

Signature

Member 2 - National Authority representative, Ministry of Regional Administration and Public Works, Bulgaria



Signature

Member 3 - External Expert (from the Evaluation Unit), Ministry of Regional Development and Public Administration, Romania

