

Постъпили становища и предложения от общественото обсъждане на проекта на Програмата за трансгранично сътрудничество ИНТЕРРЕГ ИПП България - Турция 2021-2027

№	Организация/Потребител	Предложения и становища	Постъпило чрез	Дата на постъпване	Приети/неприети	Мотиви
	Илиана Савова	<p>По приоритет П 3: По-сигурен трансграничен регион България планира да похарчи близо 2 милиона евро за укрепване на капацитета за справяне с незаконната миграция.</p> <p>Вместо "Гранична полиция" обаче за изпълнители са посочени ОДМВР Хасково, Ямбол и Бургас, чиито функции се изразяват да ескортират задържаните от тях нередовни мигранти до най-близкото СДВНЧ. Те не изпълняват производства по връщане, които са в ресора на Дирекция "Миграция", нито реадмисия, което спада в правомощията на ГД "Гранична полиция".</p> <p>Дори разследването на каналджийството и трафика на хора се провежда от органите, на чиято територия е извършено престъплението - разбирате, на границата, което отново води до органите на ГДГП.</p> <p>Въпросът ми е какъв точно капацитет ще изграждат въпросните ОДМВР за противодействие на незаконната миграция в трансграничните зони и защо това ще струва 2 милиона на европейските данъкоплатци, между които и ние - българските граждани?</p> <p>Не стига ли 1 милиард лева годишен бюджет на МВР?</p>	Strategy.bg	07 февруари 2022 г. 16:03:52 ч.	Неприложимо	Целта на проекта е да подкрепи правоприлагащите органи в трансграничния регион (от двете страни на границата, не само от българска страна) да се справят със специфичните предизвикателства, свързани със сигурността и хуманитарните въпроси, произтичащи от незаконната миграция, чрез сътрудничество и солидарност. През последните години преките задължения на Областните дирекции на МВР за справяне с увеличавения миграционен поток и последиците от него в трансграничната зона се умножават. Един от основните приоритети от 2013 г. до момента е идентифицирането на незаконно преминаващи и незаконно пребиваващи лица, участващи в престъпни организации или такива потенциални извършители на престъпления, свързани с трафик на хора, наркотици, оръжия или дейности, свързани с екстремизъм, радикализация или тероризъм. Тези процеси са сред факторите, влияещи негативно върху средата за сигурност, и същевременно генерират други видове престъпност и допринасят за ескалация на напрежението в граничните райони. В същото време ОДМВР не са сред бенефицинетите по "Фонд вътрешна сигурност". От турска страна партньори по проекта ще бъдат управите на Одрин и на Къркларели.
	Спортен клуб по бойни изкуства "Хикари" Бургас, VeliAslan	<p>По П2 – ИНТЕГРИРАНО РАЗВИТИЕ НА ТРАНСГРАНИЧНИЯ РЕГИОН Забеляваме, че по програмата няма предвидени средства насърчаване на приобщаващото развитие на младежите от двата гранични региона в областта на спорта. Разработване на съвместни регионални спортни дейности и обмен на знания и опит между спортни организации от двата региона, действия за насърчаване на младото поколение към здравословен начин на живот и физическа активност, съвместни обучения и обмен на опит.</p> <p>Сферата на младежта и спорта, които са ключови приоритети на ЕС, не са застъпени по никакъв начин в програмата, което виждаме като съществен недостатък.</p>	Strategy.bg	14 февруари 2022 г. 12:47:23 ч.	неприет	Изпълнението на Приоритет 2 "Интергрирано развитие на трансграничния регион" се базира на Интегрирана териториална стратегия, разработена от местните заинтересовани лица с помощта на консултант. Стратегическите цели, специфичните цели и мерките на стратегията са базирани на нуждите и потенциалите на територията.
	Становище на БСК	<p>Българска стопанска камара подкрепя по принцип предложената рамка и приоритети на Програмата за трансгранично сътрудничество. Считаме, че приоритетите отразяват основните предизвикателства пред микро-, малките и средни предприятия (ММСП) в трансграничния регион. Планираната директна подкрепа за ММСП е от решаващо значение за задълбочаване на трансграничните бизнес връзки и възползването от възможностите, които трансграничното сътрудничество предоставя за решаването на общи проблеми и предизвикателства. Оставаме на разположение за последващо сътрудничество и съвместна работа по осъществяване на заложените цели и постигане на планираните резултати на така изготвената Програма.</p>	Strategy.bg	25 февруари 2022 г. 10:24:00 ч.	N/A	N/A

Trakya University	2. Joint programme strategy <i>"While most EU internal programs provide support for solutions to global challenges, the CBC-IPA territories are still confronted with the need to catch up in their socio-economic development"</i> - What is the proof for this? How do we know CBC-IPA territories are still dealing with this? Any reference? And is this statement valid for all CBC-IPA territories or just for BG-TR territory?	Cbcbgtr@ab.gov.tr	March 2, 2022 10:44 PM	N/A	The statement is based on the prepared territorial analysis and statistical data on the main economic indicators.
Trakya University	2. Joint programme strategy <i>"In overall, a number of opposite economic trends have been observed in both sides of the border, thus it creates favourable preconditions for exchange and sharing of knowledge and good practices that will ultimately contribute to the building of cooperative cross-border economic relations."</i> - What are some proof-based evidences for this?	Cbcbgtr@ab.gov.tr	March 2, 2022 10:44 PM	N/A	The statement is based on the prepared territorial analysis and statistical data on the main economic indicators.
Trakya University	2. Joint programme strategy <i>"Proportion of the population aged 65 years and more in the Bulgarian part of the border area does not favour economic growth – it accounts to 21.2%, while on the Turkish side data illustrates a more favourable proportion – 13.6%."</i> - What are the references for all these statistics? Is the reference still Eurostat?	Cbcbgtr@ab.gov.tr	March 2, 2022 10:44 PM	Accepted	Reference is included.
Trakya University	2. Joint programme strategy <i>EU28- Better to provide an explanation in footnote for readers who are not familiar with abbreviations.</i>	Cbcbgtr@ab.gov.tr	March 2, 2022 10:44 PM	Accepted	Reference is included.
Trakya University	2. Joint programme strategy <i>"EU – 28 (2013-2020): 5.22 (2015), 5.09 (2019) Bulgaria: 7.11 (2015), 8.10 (2019) Turkey: 8.61 (2015), 8.35 (2019)"</i> - What are these statistics for? Income rate? or something else? There are 11 different datasets under income inequality. What are these stats stand for or what are the units like hours, EUR or Dept etc?	Cbcbgtr@ab.gov.tr	March 2, 2022 10:44 PM	Accepted	The text is reformulated.
Trakya University	2. Joint programme strategy <i>"The correlation between aging and income inequalities is evident, especially in territories with high rates of retired persons at risk of poverty (Bulgaria)"</i> - What is the reference for this stats?	Cbcbgtr@ab.gov.tr	March 2, 2022 10:44 PM	Accepted	The text is reformulated.

Trakya University	2. Joint programme strategy <i>"1.3 Weak linkage between education and labour market"</i> - This section solely indicates and includes valid proofs that tat least one of the priorities must be specifically for education all grade levels.	Cbcbgtr@ab.gov.tr	March 2, 2022 10:44 PM	Declined	The thematic comcentration and priorities of the programme are selected based on the EU regulations, teritorial analysis of the cross-border area, performed public consultations and lessons learned from current and previous programming periods. All these factors determine choise of the of policy objectives and priorities, as follow (approved by the Joint working group for programming): - PO 2 "A greener, low-carbon Europe" - obligatory for the programme according to the regulations; - ISO 2 "A safer and more secure Europe" - taking into account that the irregular migration in CB area is most likely to continue to rise security and humanitarian concerns there is a neet to strengthen good migration management; - PO5 "A Europe closer to citizens" - give the opportunity the multi-thematic challenges of the border area to be tackled through a territorial development strategy, applying integrated measures across different sectors. In addition problems related to education is adressed by specific objective "Improving the qualification of local communities for successful integration and realisation in the labour market" of the Integrated territorial strategy, based on which will be implemented priority 2 "Integrated development of the cross-border region" of the programme.
Trakya University	2. Joint programme strategy <i>"Although the share of attained primary and secondary education level in the whole CBC area is slightly above or very close to the national average of the respective country, the share of those who leave the education and training systems reaches alarming proportions"</i> - How do we know this? What are the data or evidence or research based proofs?	Cbcbgtr@ab.gov.tr	March 2, 2022 10:44 PM	Accepted	Source of information is included. Detailed information is available in the Territorial analysis of the Bulgaria - Turkey cross-border area.
Trakya University	2. Joint programme strategy <i>"On national level, 'Early leavers from education and training (% of population aged 18-24)' (Eurostat indicator) reveal important disparities between both countries"</i> - Is there a typo? % ? of population?	Cbcbgtr@ab.gov.tr	March 2, 2022 10:44 PM	N/A	Early leavers from education and training denotes the percentage of the population aged 18 to 24 having attained at most lower secondary education and not being involved in further education or training. More information is available here: https://ec.europa.eu/eurostat/cache/metadata/en/edat1_esms.htm
Trakya University	2. Joint programme strategy <i>"Despite the observed large share of early educational leavers in Turkey, which makes the country the worst European performer on that indicator, Turkey marks 10% drop of leavers over a period of 5 years, while data for Bulgaria show a slight increase for the same period of time"</i> - These statements are not very clear and confusing. Better to restate. For example, if Turkey marks 10% drop out rates in five years period of time and Bulgaria shows slightly increase in same period, does that mean BG has higher drop-out rates than TR? If so, why Turkey is entitled as the worst performing on that indicator through EU28? What is the reference or data for this?	Cbcbgtr@ab.gov.tr	March 2, 2022 10:44 PM	N/A	Due to the limitations of the template, the text in the programme document is reformulated.

Trakya University	2. Joint programme strategy <i>"In both countries, curriculum development, textbook approval and the framework for assessment practices are all determined centrally. This makes the secondary education not flexible enough to ongoing update to swift technological development, and options for adapting curricula are limited to those of the elective classes and extracurricular activities. This consideration is important when territorial measures for overcoming certain education deficits need to be put in place" - This is a well-stated commitment and creates a strong reason for a need in improvement in K-12 and Vocational education in CBC-Region. If this is a clear need, then why not the Education and Vocational training in CBC region is not one of the priorities of the program?</i>	Cbcbgtr@ab.gov.tr	March 2, 2022 10:44 PM	N/A	Due to the limitations of the template, the text in the programme document is reformulated.
Trakya University	2. Joint programme strategy <i>"There are 2 universities in each of the two sides of the border, including one filial of Trakia University (Stara Zagora) in Haskovo, totalling 5 academic institutions in the CBC area" - In TR side there are Trakya University and Kırklareli University and each has several different campuses across the CBC territory. These should be added to the document.</i>	Cbcbgtr@ab.gov.tr	March 2, 2022 10:44 PM	Accepted	Due to the limitations of the template, the text in the programme document is reformulated. Detailed information about the universities in the CBC area are included in the Territorial analysis of the Bulgaria - Turkey cross-border area.
Trakya University	2. Joint programme strategy <i>"Income has been defined as a key factor explaining inequalities in access to healthcare: the lower the income, the more unmet medical needs" - Is there a proof based evidence for such a correlation?</i>	Cbcbgtr@ab.gov.tr	March 2, 2022 10:44 PM	Accepted	The text is reformulated.
Trakya University	2. Joint programme strategy <i>"This is evident through the data on the employment in technology and knowledge-intensive sectors (Eurostat HTEC_EMP_NAT2), which equalize Bulgaria (4%) with the EU average (4.2%), while Turkey lags considerably behind (1%) being the European country with the lowest employment in technology and knowledge-intensive sectors." - Where all the data comes from? Any reference?</i>	Cbcbgtr@ab.gov.tr	March 2, 2022 10:44 PM	N/A	Due to the limitations of the template, the text in the programme document is reformulated.
Trakya University	2. Joint programme strategy <i>"The contribution of Yambol and Haskovo districts is below 1%" - Any reference? or evidence based proof? How do we know?</i>	Cbcbgtr@ab.gov.tr	March 2, 2022 10:44 PM	Accepted	Reference is included.
Trakya University	2. Joint programme strategy <i>"In other words, the coexistence of vast and diverse maritime, mountainous, balneo, and cultural hotspots in the programme area has still not be transformed in a sustainable factor for territorial development despite its potential for that partially exemplified through the existent, yet underdeveloped EuroVelo 13 Iron Curtain Tail corridor passing through Bulgaria and Turkey" - What does it mean? Tail or Trail?</i>	Cbcbgtr@ab.gov.tr	March 2, 2022 10:44 PM	Accepted	The technical error is corrected.
Trakya University	2. Joint programme strategy <i>"1.8 High risk of natural hazards and biodiversity loss" - Based on the evidences and discussions below, why not biodiversity and ecological life, nature protection etc. have not been specified clearly in program objectives?</i>	Cbcbgtr@ab.gov.tr	March 2, 2022 10:44 PM	Declined	Problems related to ecological life, nature protection is adressed by specific objectives "Increasing the contribution of the natural heritage to the balanced sustainable socio-economic development of the region" and "Reduce pollution and the negative effects of climate change and foreseeable natural disasters of a transboundary nature" of the Integrated territorial strategy, based on which will be implemented priority 2 "Integrated development of the cross-border region" of the programme.

Trakya University	2. Joint programme strategy <i>"Other key factors expected to adversely affect human health, environment, biodiversity, and economic growth include: (1) frequent floods; (2) powerful convective storms; (3) severe droughts; (4) landslides; (5) increasing frequency of forest fires due to insufficient afforestation, self-ignition of dry grass near forests, careless handling of fire, uncontrolled burning of household waste; (6) relatively high seismic hazard" - Information provided in this paragraph needs reference? What are the proof based evidences for this?</i>	Cbcgtr@ab.gov.tr	March 2, 2022 10:44 PM	N/A	The statement is based on the prepared territorial analysis and environmental sources on European level.
Trakya University	2. Joint programme strategy <i>"Various analyses, assessments, and scenarios by national and international institutions and experts place Bulgaria and Turkey among the countries with a higher risk of climate change" - How do we know it's high? And what are some specific analyses and assessment results and who complete and report those?</i>	Cbcgtr@ab.gov.tr	March 2, 2022 10:44 PM	Accepted	The text is reformulated.
Trakya University	2. Joint programme strategy <i>"No indications for economic downturn have been observed in the programme area, on the contrary, the scope of the economic activities has been increasing in each of the CBC regions, yet the CBC economy on the Turkish side of the border is more productive" - Reference needed for the statistics.</i>	Cbcgtr@ab.gov.tr	March 2, 2022 10:44 PM	Accepted	Reference is included.
Trakya University	2. Joint programme strategy <i>"At CBC level, it has significantly decreased from an average of 12% in 2014 to 5,3% in 2019, yet, it is higher than the national average." - Need reference for the stats.</i>	Cbcgtr@ab.gov.tr	March 2, 2022 10:44 PM	N/A	Due to the limitations of the template, the text in the programme document is reformulated.
Trakya University	2. Joint programme strategy <i>"Investments for development and implementation of attractive job prospects and comprehensive digital upskilling programmes, including measures of the silver economy, in order to build a sustainable path towards the 2030 employment target of 78%" - What does it mean?</i>	Cbcgtr@ab.gov.tr	March 2, 2022 10:44 PM	N/A	The Silver Economy is the part of the general economy that are relevant to the needs and demands of older adults.
Trakya University	3. Justification for the selection of policy objectives and the Interreg specific objectives, corresponding priorities, specific objectives and the forms of support, addressing, where appropriate, missing links in cross-border infrastructure - Its incomplete...try to adjust table properties for full visibility of the content.	Cbcgtr@ab.gov.tr	March 2, 2022 10:44 PM	N/A	The whole table is visible.
Trakya University	2.1.1.2., 2.1.2.2., 2.2.2, 2.3.2 Related types of action, and their expected contribution to those specific objectives and to macro-regional strategies and sea-basis strategies, where appropriate <i>"For INTERACT and ESPON programmes: Reference: point (c)(i) of Article 17(9) Definition of a single beneficiary or a limited list of beneficiaries and the granting procedure" - Beneficiaries should be listed for this priority? It's still not clear MSMEs will be able to become a beneficiary or only will be target groups? They listed as beneficiaries in summary document but not here? Is there a specific reason for this? If so, it should be listed to eliminate confusion. If its only for INTERACT and ESPON programs then ignore the comment, but still whether MSMEs could possibly be beneficiary or target is not very clear.</i>	Cbcgtr@ab.gov.tr	March 2, 2022 10:44 PM	N/A	The field is applicable only for INTERACT and ESPON programmes.

Trakya University	<p>2.1.1.3. Indicators Table 2: Output indicators "Jointly developed solutions" - What does it mean? "solutions" - How to measure those? "Milestone (2024) - 0" - Why is it zero and not expect any as milestone? Table 3: Result indicators "Final target (2029) - 9" - How to determine 12 as target value above and 9 here?</p>	Cbcbgtr@ab.gov.tr	March 2, 2022 10:44 PM N/A	<p>All output and result indicators under the programme are common indicators and are included in Annex I (COMMON OUTPUT AND RESULT INDICATORS FOR ERDF AND THE COHESION FUND – ARTICLE 8(1)) of REGULATION (EU) 2021/1058 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 24 June 2021 on the European Regional Development Fund and on the Cohesion Fund. The definitions of indicators and the way it is measured is described in details in the COMMISSION STAFF WORKING DOCUMENT - Performance, monitoring and evaluation of the European Regional Development Fund, the Cohesion Fund and the Just Transition Fund in 2021-2027 available at: https://ec.europa.eu/regional_policy/en/information/publications/evaluations-guidance-documents/2021/performance-monitoring-and-evaluation-of-the-european-regional-development-fund-the-cohesion-fund-and-the-just-transition-fund-in-2021-2027</p> <p>The methodology used for calculation of targets and milestones of selected indicators is based on statistics from INTERREG-IPA 2014-2020 Programme between Bulgaria and Turkey for the programming period 2014-2020, assumptions on indicators selected for 2021-2027 and overall programme objective and missions.</p> <p>The milestone value is set to "0" due to the piloting character of the direct support to SMEs which entails a cautious approach when programming implementation targets.</p> <p>The final target of the result indicator is set based on the assumption that in average 75% of developed solutions are taken up or up-scaled by organisations.</p>
Trakya University	<p>2.1.1.4. The main target groups "Existing and new MSMEs including those organized as cooperatives and social enterprise" - They are listed as target groups, but can they become beneficiaries since its very confusing for many stakeholders who plan to apply to the program as beneficiary MSMEs?</p>	Cbcbgtr@ab.gov.tr	March 2, 2022 10:44 PM N/A	<p>In p. 6. Indication of support to small-scale projects, including small projects within small project funds of the programme document is written that the programme will provide direct support to regional SMEs to meet new challenges arising from the new EU policy courses of development related with green transition, namely energy efficiency and circular economy (Priority 1). In the template of the programme document there is no special sections to beneficiaries, there is only section related to the target groups.</p>
Trakya University	<p>2.1.2.3. Indicators Table 2: Output indicators "Milestone (2024) - 0" - See comments above under same criteria. Table 3: Result indicators "Final target (2029) - 4" - See the comments above for the similar criteria.</p>	Cbcbgtr@ab.gov.tr	March 2, 2022 10:44 PM N/A	See the comment above.
Trakya University	<p>2.2.3. Indicators Table 2: Output indicators "Final target (2029) - 20" - See the comments above for milestone values and final target values. "Final target (2029) - 58" - How to come up with these values? Table 3: Result indicators "Final target (2029) - 44" - Above, target value for this priority stated as 20, why solutions taken up or up-scaled by organizations more than this? This should be equal or more for the same priority measures.</p>	Cbcbgtr@ab.gov.tr	March 2, 2022 10:44 PM N/A	See the comment above.

Trakya University	2.3.3. Indicators Table 2: Output indicators "Participations in joint actions across borders" - How to measure or what is the unit? Activity, number of people participating in joint actions, or number of participating organizations? Table 3: Result indicators "Final target (2029)" - Financial table ends in 2027, why stated 2029 here? Is it a typo or not date but a code or sthg?	Cbcbgtr@ab.gov.tr	March 2, 2022 10:44 PM	N/A	See the comment above. Thi financial table ends in 2027 because the the programming period is 2021-2027. The final targets of indicators end in 2029 (this is the template of the document according to Annex of the REGULATION (EU) 2021/1059 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 24 June 2021 on specific provisions for the European territorial cooperation goal (Interreg) supported by the European Regional Development Fund and external financing instruments) because by 2029 have to be achieved the final targets of the indicators.
Trakya University	4. Action taken to involve the relevant programme partners in the preparation of the Interreg programme and the role of those programme partners in the implementation, monitoring and evaluation - Its incomplete. Table properties should be aligned for the full visibility.	Cbcbgtr@ab.gov.tr	March 2, 2022 10:44 PM	N/A	The whole table is visiblr.
Trakya University	6. Indication of support to small-scale projects, including small projects within small project funds "The programme will provide direct support to regional SMEs to meet new challenges arising from the new EU policy courses of development related with green transition, namely energy efficiency and circular economy. The programme will devise the support to enterprises in full respect of the legally defined support framework which requires a strict application of the de-minimis rules (Regulation (EU) 1407/2013). The corresponding legal provisions impose financial limitations (EUR 200 000 for each undertaking over a 3-year period) on SMEs projects that are eligible for programme funding. Therefore, the support for enterprises under Priority 1 'Environmentally-friendly cross-border region' (20% of the programme budget) will go under the form of small-scale projects for up to EUR 200 000 per undertaking (that includes beneficiaries and partners)" - This sections defines MSMEs and how they can get support, but it is open for criticism whether they can get support as single beneficiaries or a consortium/partners from BG-TR. There is no information about requirement for a partnership. The question needs to be addressed is whether a single SME can apply for a grant up to 200K? if two or more SMEs can establish a consortium, or a consortium must be established by at least one SME from BG and at least one SME from TR etc? Can SMEs cooperate with NGOs under this priority? Better to provide answers of these questions in call docs, so the number of the questions directed to the managing authorities during project application can be minimized and reduce the workload of the programme authorities in both sides.	Cbcbgtr@ab.gov.tr	March 2, 2022 10:44 PM	N/A	All requirements to the applicants will be specified in detailed in the respective Guidelines for applicants which will be published when the respective call for proposals is opened.
Trakya University	6. Indication of support to small-scale projects, including small projects within small project funds "Possible selection of SPF as an operation will be at the discretion of the JMC" - Better to open SPF and JMC...	Cbcbgtr@ab.gov.tr	March 2, 2022 10:44 PM	Declined	Decision for SPF (if is feasible) will be taken by the JMC.
Trakya University	7.3. Apportionment of liabilities among participating Member States and where applicable, the third or partner countries and OCTs, in the event of financial corrections imposed by the managing authority or the Commission\ - It seems incomplete, better to check table properties.	Cbcbgtr@ab.gov.tr	March 2, 2022 10:44 PM	N/A	The whole table is visible.