Standard Project Fiche for Phare CBC 2005

1. Basic information

1.1. CRIS number: 2005/017-457.02

1.2. Title: PEOPLE TO PEOPLE ACTIONS (JSPF)

1.3. Sector: Regional Development/CBC

1.4. Location: Cross-border region between Bulgaria – Serbia and Montenegro

1.5. Duration: 12 months

2. Objectives

2.1. Overall Objectives:
The overall purpose of the Joint Small Projects Fund (JSPF) is to encourage a wide variety of occasions for the citizens of the eligible border area to get involved in cross-border cooperation. Primarily, people to people actions will be directed to develop the flow of information and communication across the border region, mainly to enhance cultural exchanges and education related activities.

2.2. Project purpose
Improvement of networking and social cohesion across the border, mainly through communication, cultural and educational co-operation related activities.

2.3. Accession Partnership (AP) and NPAA priority
The people to people actions play a key part in the process of preparation of Bulgaria and Serbia & Montenegro for accession, in particular through the improvement of the administrative capacity of local/ regional actors. The project represents thus an important element in the preparations for implementation of EU regional policy and coordination of structural instruments.

2.4. Contribution to National Development Plan (and/or Structural Funds Development Plan/SDP)
The proposed grant scheme is in line with the National Economic Development Plan of the Republic of Bulgaria over the 2000-2006 period, and namely with priority 4 “Developing Cross-border Cooperation” under the indicative programme for “Balanced and Sustainable Regional Development”.

2.5. Cross-border impact
The project is related to Priority 3 (“People-to-people actions”) of the Joint Programming Document for Phare CBC/CARDS Neighbourhood Programme between the Republic of Bulgaria and Serbia & Montenegro for the period 2004-2006. Primarily, people to people actions will be directed to develop the flow of information and communication across the border region, mainly to enhance cultural exchanges and education related activities. People to people actions are to be considered extremely useful in the strengthening of local communities and NGOs and in their use as a vehicle for cross-border durable contacts.
Actions for the promotion and marketing of cultural heritage for its very many different purposes (tourism development, culture, etc.) could be financed within the framework of this measure, such as: local exhibitions, support to craftsmanship and traditional production, development of territorial or ethnic studies and researches, actions aimed at recuperating traditions, etc.

The “people-to-people” type of actions is given an allocation of 10-20% of the total Programme’s appropriations. These actions will concern small-scale, soft (non-investment) local projects and will be supplementary to the other two programme’s priorities in providing a common consensus and a favourable background to the implementation of major scale interventions.

3. Description

3.1. Background and justification

The inclusion of flexible funding mechanisms like Joint Small Project Fund (JSPF) aiming at small-scale interventions addressing identified local needs is an efficient instrument due to its popularity among local/ regional actors and a relatively quick implementation period.

The analysis of the border area has already identified the multicultural traditions of the eligible area and the common historical and cultural heritage as a major strength. It has also pointed out that there do already exist cross-border initiatives in the form of joint actions of local communities and NGOs.

Furthermore, the experience of the preliminary project ideas’ collection launched in May 2004 among local stakeholders for an evaluation of JPD measures, has clearly demonstrated that there is an abundance of small-scale (below € 50,000) people-to-people cooperation projects seeking support in the eligible cross-border area. Since such projects play pivotal role for creating favourable environment for long-term cooperation, the need for an instrument supporting such initiatives under all other measures of the programme is addressed through this project.

3.2. Sectoral rationale

N/A

3.3. Results

Financial support through grants to small-scale “people-to-people” actions in the border regions should produce the following results:

- Increased intensity and degree of cross border co-operation between local authorities, NGO and other stakeholders on the two sides of the border;
- Increased level of public awareness and information on CBC, its purpose and objectives, and on the JSPF scheme;
- Increased local involvement to implement small-scale actions that may form the basis for larger cross-border co-operation projects;
- Minimum 22 individual small cross-border cooperation measures in line with the priorities of the Joint Programming Document for the period 2004-2006 completed

3.4. Activities

The grants will only be made for projects whose immediate objective is non-commercial and strictly non-profit making. Under no circumstances may grant give rise to profits (i.e. it will be restricted to the amount required to balance income and expenditure for the project).
Eligibility criteria, eligibility of area, applicants and partners

Eligibility of area
On the Bulgarian side:
The JSPF is applicable for the following cross-border districts: Kjustendil, Vidin, Pernik, Montana and a part of Sofia district (municipalities of Godech, Dragoman, Kostinbrod, Svoge and Slivnitsa).

On the Serbian side:
The JSPF is applicable for the following cross-border districts: Bor, Zajecar, Nisava, Pirot, Jablanica and Pcinja.

Basic eligibility criteria (considered as joint projects):
- Simple projects with a cross-border effect taking place mostly or exclusively on one side of the border but for the benefit of both partners impact;
- Complementary projects where an activity on one side of the border is accompanied by a similar activity on the other side of the border;
- Integrated projects where partners on either side of the border contribute different elements to a single project.

Hence, only the projects falling into one of these categories could be considered eligible to the Neighbourhood Programme.

Priority areas
The grant scheme is primarily aimed at encouraging a wide variety of occasions for the citizens of the eligible border area to get involved in cross-border cooperation in the following fields:

- Cultural exchanges and promotional events for cultural heritage or natural attractions
The JPSF will support initiatives aimed at improving cultural relations between Bulgaria and Serbia & Montenegro; promoting the exchange of experience, skills and ideas for projects in the future mutual exchanges among youth; folk undertakings; development of cultural traditions; creation and development of cultural networks on either side of the border and the establishment of information and training centres for cultural exchange, etc. It will support also the studying of cultural historical heritage in the border area; popularising historical cultural heritage of the region; joining young people to local cultures; creating a positive notion of history, culture and art of neighbouring countries; creating a model of useful and stable practice for co-operation between different institutions; promotion of cultural tourist product; creation of information network and strategy for representing of the cultural tourist product(s), etc.

- Education exchanges and training initiatives
Development of quality education by encouraging cooperation between people and institutions at both sides of the border through a wide range of actions, such as promoting the mobility of citizens; innovative teaching and learning projects; networks of academic and professional expertise; designing joint study programmes, establishing networks, exchanging information, thus also promoting life-long learning for all citizens of the border region.

- Organisation of local exhibitions or fairs
The joint activities of this type will support more frequent contacts especially between the chambers of commerce and industry and the industrial associations with decisive importance for the formation of a favourable business environment. Marketing initiatives, markets, exhibitions and advertising events, and so forth; the creation of cross-border co-operation structures and partnerships among supporting organisations as well as actions for the promotion and marketing of cultural heritage for its very many different purposes (tourism development, culture, etc.) could be financed within the framework of this priority area.

- **Bilateral actions for the joint solution of common social problems**
  Support to wide range of actions intended to promote the integration of various disadvantaged groups; collective actions to assist people with disabilities; combat discrimination on grounds of racial or ethnic origin, religion or belief, disability, age and sexual orientation; promoting dialogue with civil society organisations; carrying out analysis and evaluation, developing the capacity to combat and prevent discrimination, and raising awareness, etc.

- **Actions to improve the flow of information and communication between border regions**
  Development or establishment of facilities and resources to improve the flow of information and communications between border regions, including support for cross-border radio, television, newspapers and other media.
  Support for promotion of cooperation between media and civic organizations in research, capacity development and joint TV programming across borders and ethnicities; organising information and awareness events to inform public opinion across borders and ethnicities on ideas and principles underlying EU integration processes; promoting decentralization and the development of local democracy as a key component of regional and community development; fostering better mutual understanding and exchange experiences and know-how with neighbour country professionals.

- **Justice, freedom and security**
  Protection against illegal activities in the border region by developing training partnership projects on increasing the efficiency of border controls in the field of illegal immigration, trafficking in human beings, illegal traffic of goods (including drugs, historical and cultural valuables, intellectual piracy referring to false documents) and cross border crime etc.
  Schemes that help to create and intensify the skills through specialized training of bodies in charge of the fight against fraud, corruption, money laundering etc will be supported as well as projects supporting organisations, information networks and improvement of custom’s services.

**Beneficiaries:**
Potential beneficiaries of this measure will be non-profit-making organisations and might include local and regional authorities; associations of local and regional authorities; Euro regions; chambers of commerce, industry or agriculture; professional associations; trade union associations; non-governmental organisations; schools, colleges, universities etc.

The organizations eligible for support must be registered (or to have a branch office) in the following cross-border districts: Vidin, Montana, Kjustendil, Pernik and part of Sofia district (municipalities of Godech, Dragoman, Kostinbrod, Svoge and Slivnitsa) for the Bulgarian territory. Newly established entities will be eligible for funding.

The grant scheme will be implemented though joint Call for Proposals and in compliance with the provisions laid down in the JPD. **The maximum project duration** of a single project under this grant scheme will be **12 months.**
The joint Call for Proposals will use funds, which are allocated to the Neighbourhood Programme under the EU Phare and CARDS programmes, and which will cover the respective eligible activities from the both sides of the border. The eligible applicant should prepare a joint application form in accordance with the requirements set out in the Guidelines for Applicants.

The minimum grant for a single application to be contracted (under Phare) is €10,000 while the maximum one is €50,000. Moreover, a grant may not exceed 90% of the total project costs. The balance must be financed from the applicant’s or partners’ own resources, or from sources other than the European Union budget.

Detailed eligibility criteria for participation in the grant scheme will be given within the Guidelines for Applicants. The applicant organisations must be registered (or to have a branch office) in the eligible border region.

3.5. Linked activities
At present the contacts between the two sides of the border region are predominantly in the fields of cultural and trade relations; further contacts could be pursued in the spheres of production, infrastructure, and protection of the environment, technological and educational exchange. Both Bulgaria and Serbia (although this last in a lesser ratio) have already recorded a number of previous experiences in dealing with EC aid, within the framework of different programmes and initiatives.

The JSPF forms an integral part of the Phare CBC/CARDS Neighbourhood Programme. It complements other projects of the above Programme primarily by creating a flexible mechanism for the support of small-scale activities. The JSPF of the 2005 programme will be the second consecutive edition of this instrument in this area and will be based on the experience of the Joint Small Project Funds supported by previous programme in 2004, namely 2004-016-785.01.02 “People to People actions”.

3.6. Lessons learned
The JSPF is the second of this type to be implemented between the two neighbouring countries with joint EU funding (Phare and CARDS). Although the Small Project Fund Bulgaria – Serbia and Montenegro was introduced in the 2004 programme, the Grant Scheme mechanism allows not only the alignment of Phare CBC and CARDS procedures but also to increase the level of co-operation: from the general co-operation to more concrete and basic cooperation in the project preparation and its implementation phase. It remains the most successful instrument to prepare the final beneficiary (applicant) on future SF implementation. It has an especially positive impact on NGOs and NPOs empowerment in the cross-border area. It also has a clear impact on the division of tasks and roles on the NUTS III level with regard to regional development and its institutions.

The previous experience of both countries under various other EU programmes provides evidence of what has been achieved so far.

As evaluated by ECOTEC Bulgaria in the Interim Evaluation of the EU Phare Programme for the CBC Sector, lessons learned from previous programmes are:
1. Interaction on a local level through the JSPF is apparently much better, although there have not yet been any jointly funded “mirror” projects due to the centralised nature of implementation. At present, grant schemes do not contribute to capacity building of local administrations. The potential exists for this in the future if management is decentralised.
2. People to people grant schemes are an appropriate method to initiate and strengthen communication between communities on each side of the border. It would be relevant to use the JSPF as a tool to promote decentralization in preparation for post accession CBC funding.

3. With greater decentralization and operational budgets, the JSPF could contribute to the building of local administrative capacity and facilitate potential applicants in their preparation of projects.

4. Institutional Framework

The JSPF institutional framework is based on the principle of both countries being equal partners and with both countries having an equal role in the management structures.

As described in the JPD, the management structures will include: (a) the national authorities responsible for Programme co-ordination (Implementing Agency in Bulgaria, and Project Coordination and Management Unit (PCMU) in Serbia & Montenegro; (b) the Joint Cooperation Committee and the Joint Steering Committee; (c) assisted by a Joint Technical Secretariat.

On the Bulgarian side, the responsibilities for Phare-CBC Programme are laid down with the Implementing Agency Phare – ESC/ CBC at the Ministry of Regional Development and Public Works. It will be acting as a Contracting Authority with the overall responsibility for the programme implementation, as well as administrative, technical and financial management of the grant scheme. MRDPW as a co-ordinator for CBC programme is obliged also to monitor the physical and financial implementation of this project including Phare and co-financing payments, and report to the EC in regularly reports. The MRDPW will ensure necessary human resources for the technical management of the Grant Scheme.

On the Serbian side, the responsibilities on the day-to-day tasks lay down with PCMU at the Ministry for International Economic Relations (MIER), while the European Agency for Reconstruction (EAR) will act as Contracting Authority.

The Joint Technical Secretariat, established under the framework described in the JPD, will assist the Bulgarian IA and the Serbian PMCU in the implementation of the Grant Scheme.

5. Detailed budget

<table>
<thead>
<tr>
<th>Phare Support</th>
<th>Phare/Pre-Accession Instrument support</th>
<th>Co-financing</th>
<th>Total Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>€M</strong></td>
<td><strong>National Public Funds</strong></td>
<td><strong>Other Sources</strong></td>
<td><strong>Total Co-financing of Project</strong></td>
</tr>
<tr>
<td>Year 2005 Institution Building support</td>
<td>0.600</td>
<td>(**)</td>
<td>0.600</td>
</tr>
<tr>
<td>IB support</td>
<td>0.600</td>
<td>(**)</td>
<td>0.600</td>
</tr>
<tr>
<td>Total project 2005</td>
<td>0.600*</td>
<td>(**)</td>
<td>0.600</td>
</tr>
</tbody>
</table>

* The rate of the generally available maximum support (Phare funds) could not exceed 90 % of the total cost, while the rest has to be provided as own resources by the beneficiaries.

** The necessary minimum of 10 % co-financing for the projects will be provided by the beneficiaries. The total amount of co-financing and total budget for the projects will be defined after contracting.
5.2 CARDS Support

The joint projects will be financed through both Phare and CARDS for the respective activities of each side of the border. The CARDS allocation for this grant scheme will follow similar proportions per component as they are set out for the Phare ones. The indicative CARDS allocations are as follows:

<table>
<thead>
<tr>
<th>Year 2005 in € M</th>
<th>CARDS SUPPORT</th>
<th>National Co-financing **</th>
<th>IFI</th>
<th>TOTAL</th>
</tr>
</thead>
<tbody>
<tr>
<td>Grant Scheme</td>
<td>Investment Support</td>
<td>National CARDS*</td>
<td>Total CARDS (=I+IB)</td>
<td></td>
</tr>
<tr>
<td>Grant Scheme</td>
<td>0,200, 0,200</td>
<td>0,400</td>
<td>0,400</td>
<td></td>
</tr>
<tr>
<td>TOTAL</td>
<td>0,200</td>
<td>0,200</td>
<td>0,400</td>
<td>0,400</td>
</tr>
</tbody>
</table>

* Stated funds are tentative allocation of Serbian national CARDS budget for year 2005 – expenditure is possible in 2005 and 2006
** The minimum co-financing requirements for the grant applicant from SCG is:
   - 5% for projects less than € 50,000

6. Implementation Arrangements

6.1. Implementing Agency

Bulgaria
The Implementing Agency will be the Ministry of Regional Development and Public Works:

Implementing Agency:
Ministry of Regional Development and Public Works
Address: 17-19 Cyril and Methodius St. 1202 Sofia
Director: Tzvetomira Lacheva – Deputy PAO
Contact Person: Hristo Medarov, Head of Phare CBC Department
Phone: +359 2 9405-237, +359 2 987 0737
Fax: +359 2 987 0737
E-mail: hmedarov@mrrb.government.bg

It acts as Contracting Authority for the Phare funds.

Serbia & Montenegro

Programme Co-ordination and Management Unit
Government of the Republic of Serbia
Ministry of International Economic Relations
Assistant Minister: Gordana Lazarevic
Contact persons: Sanda Simic, Mirjana Jelic
Address: Gracanicka 8, 11000 Belgrade
Phone: +381-11-3346-112, +381-11-3346-591 / Fax: +381-11-3346-844
E-mail: sanda@mier.sr.gov.yu, mimi@mier.sr.gov.yu
The JSPF will operate on the basis of a single call for proposals and a single selection process covering both sides of the border. The Grant Scheme will be implemented according to the NP Implementing Guidelines issued by the Commission. Except when provided differently in the Implementing Guidelines, the award procedures provided in the PRAG will be implemented. The implementation provisions will follow the overall structure as provided within the JPD (2004-2006). Meanwhile both IA and PCMU will be responsible with elaboration of rules of procedure.

6.2. Twinning
N/A

6.3. Non-standard aspects
There are no non-standard contracts or tender procedures envisaged within this project.

6.4. Contract
The JSPF will be implemented via one single (joint) Call for Proposals simultaneously launched in Bulgaria and Serbia & Montenegro. The number of the individual grant-contracts to be signed will vary depending on the number of the proposals received for each component and the respective grant amounts approved for funding.

7. Implementation Schedule

7.1 Start of tendering/call for proposals
September 2005

7.2 Start of project activity
January 2006

7.3 Project completion
January 2007

8. Equal Opportunity
The project will stimulate the process building the partnership between the national, regional and local partners in terms of responsibilities taken, decision making and priorities setting and will be in no way discriminatory in terms of gender, life-style, religion or politics. It will contribute to the equal opportunities referring to gender.

9. Environment
The specifics of the grant scheme does not foresee concrete investment element.

10. Rates of return
N/A
11. Investment criteria

11.1. Catalytic effect

Without PHARE assistance, the project would not be implemented in the near future, because of the lack of funds. By exposing applicants to grant scheme procedures, it lays the ground for the future absorption of Structural Funds.

11.2. Co-financing

The beneficiaries of the People to people actions project will contribute with at least 10% of the total budget of the total cost of the projects.

11.3. Additionality

No other financing sources from the private sector or from IFIs were available for financing this project.

11.4. Project readiness and size

All documents shall be prepared according to the PRAG template and submitted to the EC Delegation for endorsement prior to the launch of the Call for proposals. Only projects ready for tendering can be supported. The grant is limited to a maximum of € 50 000 per project. The minimum amount of the grant is € 10 000. The Phare contribution to the project is € 0.6 million.

11.5. Sustainability

The development of the border region is part of government’s strategy of maintaining good relations with neighbours.

11.6. Compliance with state aids provisions

The project respects the state aids provisions.

11.7. Contribution to National Development Plan

The proposed grant scheme is in line with the National Economic Development Plan of the Republic of Bulgaria over the 2000-2006 period, and namely with priority 4 “Developing Cross-border Cooperation” under the indicative programme for “Balanced and Sustainable Regional Development”.

12. Conditionality and sequencing

The project will start after signing of the Financing Memorandum between Bulgaria and the European Union for 2005. In certain circumstances, the Call for proposals might be launched with suspense clause, if the EU funding is not yet available (e.g. prior to Commission Decision approving the Financing Proposal). All documentation required for launching joint Call for Proposals (Application Pack) will be prepared by the JTS by August 2005 and will be submitted to the respective EC Delegation/EAR for approval.
Annexes to Project Fiche:

1. Logical Framework in standard format
2. Detailed implementation chart
3. Contracting and disbursement schedule
### Annex 1

**LOGFRAME PLANNING MATRIX FOR**
Project Title: PEOPLE TO PEOPLE ACTIONS (JSPF)

<table>
<thead>
<tr>
<th>Project number</th>
<th>BG 2005/017-457.02</th>
</tr>
</thead>
<tbody>
<tr>
<td>Contracting period expires</td>
<td>contracts expire 30.11.2007</td>
</tr>
<tr>
<td>Disbursement period expires</td>
<td>30.11.2008</td>
</tr>
<tr>
<td>Total budget:</td>
<td>Phare budget: €M 0,600</td>
</tr>
</tbody>
</table>

#### Overall Objectives

The overall purpose of the Joint Small Projects Grant Scheme is to encourage a wide variety of occasions for the citizens of the eligible border area to get involved in cross-border co-operation. Primarily, people to people actions will be directed to develop the flow of information and communication across the border region, mainly to enhance cultural exchanges and education related activities.

- Greater awareness of Phare CBC/CARDS Neighbourhood Programme
- Positive attitude towards cross-border co-operation to solve common concerns and to utilise potentials

**Objectively Verifiable Indicators**

<table>
<thead>
<tr>
<th>Sources of Verification</th>
</tr>
</thead>
<tbody>
<tr>
<td>National/Regional Reports</td>
</tr>
<tr>
<td>Implementing Agency reports</td>
</tr>
<tr>
<td>Special pre and post surveys</td>
</tr>
<tr>
<td>Independent EU evaluations</td>
</tr>
</tbody>
</table>

#### Project Purpose

Improvement of networking and social cohesion across the border, mainly through communication, cultural and educational co-operation related activities.

- Number and types of formally constituted partnerships and other long-term co-operation arrangements across the border increasing (at least 20 %)

**Objectively Verifiable Indicators**

<table>
<thead>
<tr>
<th>Sources of Verification</th>
</tr>
</thead>
<tbody>
<tr>
<td>Monitoring Reports</td>
</tr>
<tr>
<td>Progress Reports</td>
</tr>
</tbody>
</table>

**Assumptions**

Successful programme promotion, including support to applicants

#### Results

Financial support through grants to small-scale “people-to-people” actions in the border regions should produce the following results:
- Increased intensity and degree of cross
- Number and type of projects successfully carried out - average 20 - 25
- Number of cross border exchanges

**Objectively Verifiable Indicators**

<table>
<thead>
<tr>
<th>Sources of Verification</th>
</tr>
</thead>
<tbody>
<tr>
<td>Individual project progress reports</td>
</tr>
<tr>
<td>Monitoring and evaluation reports</td>
</tr>
</tbody>
</table>

**Assumptions**

- Sufficient project management skills on behalf of the beneficiaries
border co-operation between local authorities, NGO and other stakeholders on the two sides of the border;
- Increased level of public awareness and information on CBC, its purpose and objectives, and on the JSPF scheme;
- Increased local involvement to implement small-scale actions that may form the basis for larger cross-border co-operation projects;
- Minimum 22 individual small cross-border cooperation measures in line with the priorities of the Joint Programming Document for the period 2004-2006 completed

<table>
<thead>
<tr>
<th>Activities</th>
<th>Means</th>
<th>Assumptions</th>
</tr>
</thead>
</table>
| Funding for eligible actions: Cultural exchanges and promotional events for cultural heritage or natural attractions; Education exchanges and training initiatives; Organisation of local exhibitions or fairs; Bilateral actions for the joint solution of common social problems; Actions to improve the flow of information and communication between border regions; Justice, freedom and security | Implementation of the grant scheme in line with the provisions of the PRAG and the JSPF Guidelines for Applicants; At average 20-25 individual grant contracts signed. | - Sufficient number of good quality project proposals  
- Co-finance contributions available when required  
- Preconditions  
The documentation, necessary for the launching of the grant scheme prepared by the signing of the FM |
ANNEX 2
IMPLEMENTATION CHART
Project title: PEOPLE TO PEOPLE ACTIONS (JSPF)

ANNEX 2 - Implementation Time Chart
PEOPLE TO PEOPLE ACTIONS (JSPF)

<table>
<thead>
<tr>
<th>Components</th>
<th>2005</th>
<th>2006</th>
<th>2007</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Joint Small Projects Fund / People to people actions</td>
<td>T</td>
<td>T</td>
<td>T</td>
</tr>
</tbody>
</table>

T = Tendering       C = Contracting       I = Implementation/works

ANNEX 3: CONTRACTING AND DISBURSEMENT SCHEDULE BY QUARTER
Project title: PEOPLE TO PEOPLE ACTIONS (JSPF)

<table>
<thead>
<tr>
<th>CONTRACTING</th>
<th>Cumulative contracting schedule by quarter in € m (provisional)</th>
<th>2005</th>
<th>2006</th>
<th>2007</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>I</td>
<td>II</td>
<td>III</td>
<td>IV</td>
</tr>
<tr>
<td>Grant Scheme</td>
<td></td>
<td>0,600</td>
<td>0,600</td>
<td>0,600</td>
<td>0,600</td>
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</tbody>
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<table>
<thead>
<tr>
<th>DISBURSEMENT</th>
<th>Cumulative disbursement schedule by quarter in € m (provisional)</th>
<th>2005</th>
<th>2006</th>
<th>2007</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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<td>I</td>
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<td>III</td>
<td>IV</td>
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