



Ex post evaluation of the European Union Solidarity Fund 2002-2016

Case Study - Bulgaria

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BULGARIA, SEVERE WINTER CONDITIONS, JANUARY–FEBRUARY 2015

1 INTRODUCTION

This section presents a case study for the Ex Post Evaluation of the European Union Solidarity Fund, assessing the EUSF application relating to **severe winter conditions of South-east, South-central, South-west, North-west, North-central and North-east regions of Bulgaria in January-February 2015 (case 120)**.¹ The aim of the case study is to analyse the implementation and performance of the EUSF in order to contribute to the understanding of effectiveness, efficiency, relevance, added value and solidarity of EU funding. The following section sets out the context for the EUSF support provided and a brief overview of the intervention. It then examines the experience of implementation, the factors influencing implementation, the relevance of EUSF, the administrative burdens and costs associated with the intervention, the achievements and added value of the EUSF support, and the lessons learned.

2 CONTEXT

In the period between 30 January and 4 February 2015, prolonged and heavy rainfall, combined with hurricane force winds, led to severe flooding causing major damage to public and private infrastructure in Bulgaria. The high water-level of rivers damaged bridges, and destroyed road and railway infrastructure, drains, culverts and retaining walls. The increased flow of underground water led to flooding of public and private buildings. Excessive levels of groundwater triggered landslides across the country.

The damage affected all six NUTS regions and 17 of 28 districts. The most affected region was the south-east of Bulgaria. More than 300 buildings in Burgas municipality were flooded. The public transport and water infrastructure were badly damaged, and one of the principal water-mains in the town became inoperational and needed emergency reconstruction. The affected population of Burgas District comprised 412,684 inhabitants. The Tundja River broke its banks and destroyed dykes outside the urban boundaries of seven settlements; the water flooded not only agriculture land, but important road infrastructure. In the region of Sliven municipality, near to Vaglen village, a landslide affected 35,000 m² of farmland and 120,081 inhabitants.

On 30-31 January 2015, winds exceeding 130 km/h hit Varshetz and Berkovitz municipalities in the North-west region. Both municipalities with a total population of 23,926 inhabitants declared a state of emergency. Approximately 182 acres of pine forests were completely destroyed. The storm caused power failures and closed roads, with more than 40 km of road infrastructure affected, and more than 10 landslides occurred in the Montana District.

Torrential rainfall in the South-central region led to rivers bursting their banks and extensive landslides, damaging road infrastructure and isolating settlements. In the Northeast regions people from two villages had to be evacuated. In the South-west region, mainly road infrastructure was affected by the disaster.

¹ This case study was researched and originally drafted by Yana Georgieva, ESTAT Ltd, and Julia Spiridonova, Proinfraconsult Ltd, and edited and revised by the EPRC Core Team.

3 OVERVIEW OF EUSF INTERVENTION

The Bulgarian authorities submitted the application on 24 April 2015, within 11 weeks of the disaster occurrence. The total estimated direct damages were estimated at EUR 243.3 million. The application was assessed as a major disaster (0.62 percent of GNI).²

Table 1: Timeline of the EUSF intervention

Intervention stage	Date
Disaster occurrence	30/01/2015
Application submission	24/04/2015
Date of Advance Decision	24/06/2015
Advance payment received (10%)	16/07/2015
Date of EC proposal	23/07/2015
Date of EP and Council Decision	06/10/2015
Commission Implementing Decision	01/11/2015
Payment date	01/12/2015
Implementation period end	01/06/2017
Implementation report due	01/12/2017
Implementation report received	30/11/2017

Source: Implementation Report, 2017.

The application was approved with a European Parliament and Council Decision on 6 October, some five months after the submission of the application by the Bulgarian authority and eight months after the occurrence of the disaster. The approved aid amounted to EUR 6,377,815 (approximately 2.6 percent of total damage).

More than 80 percent of the money applied for and granted aid was for infrastructure restoration (see Table 2). No funding was sought for temporary accommodation of the population, partly because the need was perceived to be negligible and also because municipalities, supported by local communities, businesses and NGOs, such as the Red Cross, organized immediate help after the disaster. In any case, the nature of the disaster and the damages did not engender a need for temporary accommodation of affected population.

The Implementation Report, together with the independent audit opinion was submitted within the deadline according to the regulatory time limit of six months. The reported eligible costs were EUR 6.14 million,³ representing a 96 percent absorption rate of the aid granted. However, this figure is not final because the Bulgarian authority has still not received audit comments from the Commission, and the EUSF intervention is not closed.

² Implementation Report 2017, p. 8

³ Implementation Report 2017, Annex I

4 Table 2: EUSF awarded and reported (EUR million)⁴

Categories of damage	EUSF awarded	EUSF reported
Infrastructure restoration	5,262,133	6,140,984
Temporary accommodation	0	
Preventative infrastructure & cultural heritage	993,498	
Clean-up of disaster area	122,184	
Total	6,377,815	

Source: Implementation Report, 2017.

Comparison of the timetable for this case with other EUSF cases⁵ confirms that the administrative processes for the case were conducted relatively speedily (albeit with limited number of cases from which to draw comparative information). The time period between the occurrence of the disaster and the payment of aid was (at 43.6 weeks) less than the average of the two EUSF cases of severe weather conditions (52.7 weeks) and the average for all EUSF cases in Bulgaria (49.4 weeks) (see Table 3). The application was submitted according to the deadline with no updates required; the Commission assessment was conducted in 12.9 weeks and the EP and Council assessment/approval in 10.7 weeks – both quicker than for other disasters. The Implementation Report was submitted virtually on time, but as noted above the closure process is incomplete.

Table 3: Comparison of administration of the case study with other EUSF cases

Indicators	Case study : BG120 (weeks)*	Average of all other SWC (weeks) (n=2)	Average of all BG interventions (weeks) (n=5)**
Submission of application in relation to deadline	0.0	:	:
Application completion duration	12	10.6	10.7
Commission assessment duration	12.9	16.8	14.8
EP & EC assessment duration	10.7	13.4	13.8
Time between disaster occurrence and payment of aid to beneficiary country	43.6	52.7	49.4
Submission of IR in relation to deadline	-0.1	4.1	0.6
Duration of updates to implementation report	:	:	:
Duration of closure process	:	:	143.6

Source: DG REGIO, 2018.

* BG120 – case is still ongoing; no information on updates. ** All BG cases: BG34 & BG35 – no updates to IR. BG114- submitted April 2014 – no indication of updates to IR in case files. BG116- submitted 24/08/2017 – no indication of updates to IR in case files.

⁴ The reported EUSF support (EUR 6,140,984) is not shown in the table above by categories of damages but as a total amount, because the majority of projects consist of operations from more than one category. The Coordinating Authority does not have precise data of expenditure by category.

⁵ Based on analysis of all EUSF cases undertaken for the Interim Report.

4. IMPLEMENTATION OF EUSF

The following sections describe the implementation of EUSF in more detail, covering the institutional context, application, submission, evaluation, approval, implementation, closure, and publicity and visibility.

4.1 Institutional context

The institutional framework for implementation of EUSF aid was established by Council of Ministers of Republic of Bulgaria Decision 434/18.12.2014, which was amended by Council of Ministers Ordinance 179/15.07.2015. Table 4 below summarizes the responsible institutions and their obligations.

Table 4: Institutional arrangements for the EUSF intervention

	Organization name	Role
Institution sending application	Ministry of regional development and public works	
Key implementing authorities		
<ul style="list-style-type: none"> National coordinator 	Head of managing authority of Operational programme "Regional Development 2007-2013"	Manage the EUSF aid, prepare a list of prioritized projects and sign the grant contract agreement with Executive Bodies.
<ul style="list-style-type: none"> Coordinating Authority 	"Strategic planning and programmes for regional development" General Directorate within the Ministry of regional development and public works. The Directorate is a Coordinating Authority in its capacity as Managing authority of OP "Regional Development 2007-2013"	Responsible for management and control of implementation of all activities, financed by EUSF
<ul style="list-style-type: none"> Executive Bodies 	National, regional and local authorities or other public bodies that declared damages	Implement grant agreement contract for EUSF intervention.
<ul style="list-style-type: none"> Audit authority 	Executive agency "Audit of European funds"	Carry out specific audits on EU funds and programmes in line with international agreements for EU funding and applicable EU regulations on management and control of the funds
Key stakeholders		Collect and summarize the data for damages on district level within 8 weeks
<ul style="list-style-type: none"> Ministry of Interior 		
<ul style="list-style-type: none"> Interministerial Commission for recovery and support 	General Directorate "Fire safety and protection of population" within the Ministry of Interior is a	Confirm that the prioritized projects are not financially supported by other sources of funding

<ul style="list-style-type: none"> District Governors 	Secretariat of the Commission	Responsible for hassle-free communication and information flow between local and national level
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The evaluation of the institutional arrangements shows two important features that affected the speed and efficiency of implementation of EUSF interventions. During the pre-submission phase (immediate support to the affected population and evaluation of damages), the Ministry of Interior had a key role. Its General Directorate for Fire Safety and Protection of the Population has regional units in each district town, which means they are close to the population and disaster events and have good working relations with local authorities. The General Directorate has well-trained staff organized with a military chain of command with a mission to provide assistance to the population in emergency situations. All these factors facilitated a rapid immediate response after the disaster occurred.

Interviewees from the Coordinating Authority and from Executive Bodies, confirmed the key role of the Ministry of Interior in response to the severe winter condition, particularly the rapid collection and summary of reliable information for evaluating damages. The GD for Fire Safety and Protection together with District Governors and local authorities collated information first at municipality level, and then at District level. The Coordinating Authority used this information for preparing the application for EUSF aid.

During the following phases (application submission and implementation), the General Directorate Strategic Planning and Programmes for Regional Development” within the Ministry of Regional Development and Public Works had a leading role, which was evaluated very positively by representatives of Executive Bodies. In its capacity as the Managing Authority of OP Regional Development 2007-2013, the GD has experience of dealing with Commission services and local authorities, and other public bodies as beneficiaries of EU funds. The everyday work of experts in the Managing Authority includes verification of requests for payments according to designated procedures. This is intended to guarantee a high level of control of fund disbursement and understanding of beneficiary needs and practices.

Executive Bodies and beneficiaries, including municipalities and the Road Infrastructure Agency, (in the Ministry of Regional Development and Public Works), responsible units and civil servants also had experience of carrying out ESIF-funded projects, in particular through the OP Regional Development 2007-2013.

A significant positive consequence of established institutional arrangements is the fact that at the same time, the same people were working together on implementation of projects, financed by different EU funds. Good working relations between the Coordinating Authority and Executive Bodies are important reason for relatively smooth implementation of the EUSF support.

According to the Interdepartmental Committee for Recovery and Support to the Council of Ministers for the period 2010-2015 the declared need for financial resources for DPM across Bulgaria amounted to some EUR 627,401,639, with the funds actually allocated mounting to c. EUR 233,468,592, or 36 percent of the sums required. The funds allocated during this period were for: rescue and urgent emergency works (c.EUR 37,173,156 - 73 percent of the required amount); for urgent needs and repair works

(c. EUR 150,761,060 (38 percent); and reconstruction aid (c. EUR 9,149,264, 55 percent).⁶

4.2 Application / submission phase

Based on the information reported by the Ministry of Interior, the Coordinating Authority prepared the application form for mobilizing EUSF support. The application was submitted on 24 April 2015. The representatives from the Coordinating Authority evaluated the process of preparation of the application form as straight-forward. They encountered no problems with fulfillment of the template or applying the guidance for determination of aid amounts. The communication with Commission services during this phase was informal, via e-mails, but there was little or no need for clarification or assistance to be requested. The requirements of the Regulation were considered to be easy to understand.

Although the EUSF rules were considered simple (compared with those for ESIF) by interviewees, the time needed for collecting the data for damages' evaluation was assessed as critically short. Estimated damage had to be collected and summarized from 18 municipalities in 12 districts. Within each of these municipalities a separate Commission for damage evaluation was established. The members of the Commissions undertook an inventory of mostly public property because for private property there was inadequate time. Information was transferred within the deadline to Coordinating Authority who only had a few weeks to prepare the application form. Therefore, private damages were not included in the application.⁷

The application was submitted in due time on 24 April 2015 in English. Following submission, the Commission services requested clarification, notably data from the Bulgarian meteorological service to back up the information about severe winter conditions.⁸ This had not been available within the deadline for application form submission but was subsequently provided.

Interviewees unanimously affirmed that the application procedure was simple and easy to follow (see Table 5). The interviewees, who were also involved with the two Bulgarian applications for mobilizing EUSF support in June 2014 and July 2014, stated that there was no difference between their previous experience and the case study one regarding the application and approval phases.

⁶ Draft version of the National Strategy for Disaster Risk Reduction 2017 – 2030. The amounts in Euro are calculated based on the official exchange rate of the BGN to the Euro of 1.956.

⁷ The same observation is made in Communication to the Commission, Brussels, 10.07.2015, C(2015) 4627 final.

⁸ Proposal of a Decision of the European Parliament and of the Council, p.2, p. 2.1, (3), Brussels, 23.07.2015, COM(2015) 370 final.

Table 5: Assessment of application/submission phase

Assessment of application phase	Straight-forward	Neutral	Fairly complex	Excessively complex
National Coordinator	X			
Coordinating Authority	X			
Coordinating Authority	X			
Coordinating Authority	X			
Local implementation body	X			
Local implementation body	X			
Other public implementation body	X			

Note: Assessment based on seven interview respondents.

4.3 Appraisal / evaluation and approval phase

Two months after the submission of the application on 24 June 2015 the Commission services proposed an Advance decision. In the application, the Bulgarian authorities applied for the 10 percent advance payment which was paid on 16 July 2015.

The Commission proposal was made on 23 July and the EP and Council decision followed two months later. During the interview research, it was noted by the Coordinating Authority that the time which the Commission needed to evaluate the application form is longer than the period for its preparation, which was considered not proportional to the amount of information that had to be evaluated.

The final European Commission official communication dates from 1 November 2015, six months after the submission of the application. Although, the representatives of Coordinating Authority understood the nature and pace of the procedures at EU level, they argued that there should be scope to shorten the time to final decision. Thus, while the evaluation/approval phase was straightforward, the interviewees considered that it took too much time (see Table 6).

Table 6: Assessment of evaluation/approval phase

Assessment of evaluation/approval phase	Straight-forward	Neutral	Fairly complex	Excessively complex
National Coordinator		X		
Coordinating Authority		X		
Coordinating Authority		X		
Coordinating Authority		X		
Local implementation body		X		
Local implementation body		X		
Other public implementation body		X		

Note: Assessment based on seven interview respondents.

4.4 Implementation phase

According to Decision 434/18.12.2014, amended by Council of Ministers Ordinance 179/15.07.2015, the Executive Bodies were responsible for the implementation of financed operations. Local authorities are obliged by the law to organize the immediate efforts after a disaster:

- to support the affected population through temporary accommodation and rescue services;
- to immediate restoration of working conditions of basic infrastructures; and
- to evaluate the damages.

If a disaster affects State public infrastructure the responsible institutions are at central level. In the case of the severe winter conditions in 2015, the most affected State public infrastructure was roads, for which restoration and maintenance is the responsibility of the Road Infrastructure Agency.

For the 2015 damage, on the base of information submitted for disaster damages, the National Coordinator approved a list of prioritized projects and the EUSF aid was indicatively divided among the districts affected and other public authorities. The amount of EUR 6,377,815 was divided among the eligible Executive Bodies as follow:

- 46 percent (EUR 2,955,726) for the 12 districts;
- 51 percent (EUR 3,238,775) for the Road Infrastructure Agency;
- 3 percent (EUR 171,136) for other public bodies.

After the advance award decision by the Commission on 26 June 2015, the Coordinating Authority prepared a call for proposals to direct beneficiaries (municipalities from the 12 districts, prioritized according to need). The call was published on 26 October 2015, which is after the EP and Council Decision and before the Commission Decision. A total of 21 projects were submitted and 19 of them were approved. Two projects were considered as ineligible: for the first one the damaged infrastructure was covered by insurance; for the other, the Executive Body could not provide additional documents requested.

At national level the approval of submitted projects took another four months (from January to April 2016). More than half of the operations approved for financing were for activities carried out immediately after the disaster. The total value of the grant contracts was EUR 6,370,522.24 euro, 99.89 percent of the value of the EU grant. Sixty seven per cent of the total value of grant contracts was for activities already implemented by the Executive Bodies immediately after the disaster. The representatives from both categories of Executive Bodies stated that their disaster response was not influenced by the EUSF, neither in type of activities, nor in scale and time. Therefore, they did not report any significant problems.

Under the approved 19 projects, a total of 111 operations were implemented. Among these, 56 operations were completed during the first six months after the disaster occurrence. Another 36 were finalized within 12 months of the disaster. The data show that 83 percent of all projects were completed within one year of the disaster occurrence. The projects of the municipalities of Smolyan, Zlatograd, Kirkovo, Gotze Delchev and of the Ministry of Health included emergency operations.

With respect to the implementation of ongoing operation, both interviewees from the Coordinating Authority and the Executive Bodies shared the opinion that public procurement procedures could jeopardize the implementation of the EUSF funding because they took such a long time (9-12 months including appeals). This was observed by the Coordinating Authority with reference to the experience of implementation under

two previous applications for EUSF support in 2014. In order to overcome this problem, the Bulgarian authorities decided to give priority to retrospectively completed operations and then, if there were non-contracted financial resources, to support ongoing ones. This practice sought to guarantee that the aid was spent on activities carried out immediately after the disaster and facilitated nearly full absorption.

Both representatives of Burgas municipality, at political and expert levels, assessed the overall process of operation implementation as easier than under ESIF, an opinion shared by the Road Infrastructure Agency. Both Executive Bodies implemented retrospective projects and therefore they had to submit only one report (consisting of technical and financial parts) to the Coordinating Authority.

Interviewees from the Coordinating Authority felt that the procedures for management verification were stricter than they needed to be, because the same procedures were used for implementation of EUSF and OP Regional Development 2007-2013 – although this did save time because officials and experts understood the procedures well.

Table 7: Assessment of the implementation phase

Extent of problems in implementation phase	Minimal	Limited	Moderate	Significant	Excessive
National Coordinator		X			
Coordinating Authority		X			
Coordinating Authority			X		
Coordinating Authority			X		
Local implementation body	X				
Local implementation body	X				
Other public implementation body	X				

Note: Assessment based on seven interview respondents.

4.5 Closure

The implementation report was submitted to the Commission on 30 November 2017. The interviewees from Executive Bodies did not report any problems with closure of operations; the officials involved had experience with the implementation of ESIF projects financed. Whereas for retrospectively reimbursed projects, the eligibility period was sufficient for the preparation of technical and financial reports and to submit them to the Coordinating Authority for final management verification, the time period was a constraint for ongoing projects and where the beneficiaries lacked experience with EU-financed projects. The EUSF intervention implementation report drew attention to one project that could not finish within the eligibility period of 18 months because tendering a contractor took too much time so the expenditures were made after the eligibility period.

Representatives from the Coordinating Authority commented that they did not have problems preparing the implementation report in terms of needed information, but with the way of presenting it. The implementation report was submitted in time, but with a lot effort from the Coordinating Authority because the report had already been prepared prior to a closure template being provided by the Commission and requiring

reorganisation of the report. However, they evaluated the introduction of the closure report template as positive, considering this an improvement compared with their previous experience.

The closure procedure is currently not completed and it is still ongoing.

Table 8: Assessment of closure procedures

	Minimal	Moderate	Excessive
Bureaucracy involved		X	
Complexity of information demanded	X		
Time constraints		X	

Note: Assessment based on seven interview respondents.

4.6 Publicity and visibility

According to the requirements of the Regulation both Coordinating Authority and Executive Bodies communicated the financial support from EUSF. The responsible institutions used all communication channels such as press releases, briefings, on the spot checks with media, websites and etc. at each phase of implementation cycle. Boards were not established; instead, publicity and communication rules for ESIF were used.

Notwithstanding these efforts, the common opinion of all interviewees is that the EUSF is mainly known among professionals directly involved in the implementation of the interventions. Professionals directly involved in the implementation of intervention, either at Coordinating Authority or in Executive Bodies, acknowledged the EUSF support as expression of EU Member State solidarity. Awareness was much less among the public, confirmed during the focus group with regular citizens from affected areas in Burgas municipality and by representatives from NGOs and the local newspaper.

This is attributed to several factors. First, the time lag between the disaster occurrence and the disbursement of the aid is long, and people could not easily recall information over this time period. Second, the municipalities' preferences to cover mainly retrospective activities prevented the general public from making a correlation between aid and interventions. Third, many other projects financed by the EU are on-going. Fourth, three years after the disaster, citizens and others often confused different disaster events (at least two other significant disasters have occurred in the Burgas area since 2015). All these factors contributed to the overshadowing of the use of EUSF specifically.

The main findings from the country case study are supported by the results of Media Survey conducted for this evaluation.⁹ This identified only 13 articles relating to the disaster event and mentioning the EUSF. The information provided is scarce and is limited to reporting of the intention of the Bulgarian authorities to submit a EUSF application, or subsequently reporting that the government had applied. The actual funding provided by EUSF for damage from severe winter conditions was scarcely reported. The articles are neutral, mainly citing national or local officials without commentary.

⁹ Further details are provided in the Media Survey published as a separate report.

5. FACTORS INFLUENCING THE IMPLEMENTATION OF EUSF SUPPORT

The most important factors influencing the implementation of EUSF support are considered to be institutional cooperation and public procurement. Table 9 below provides a summary of the influences of specific factors based on responses by interviewees at different levels.

Table 9: Assessment of factors influencing EUSF implementation

Factor	No influence	Slight influence	Moderate influence	Highly influential	Most influence
Governance				X	
Institutional factors				X	
Economic resources			X		
Accountability			X		
Public procurement requirements				X	
Time needed for the transfer of funding from the State to the regional accounts		X			
Lack of specific competences for managing emergency at municipal level			X		

Note: Assessment based on seven interview respondents.

- *Governance*. The way in which the process of applying and implementation was governed had high influence because the procedures were well known by all the (experienced) institutional players. The information flows from the ground to the top and the financial resources – from the top to the ground – were effective. The same government principals are implemented in carrying out other processes that affect institutions from local, regional and central level simultaneously.
- *Institutional factors*. Institutional cooperation was evaluated as highly influential because it had the most decisive role for the effective implementation of interventions. This opinion was supported by technical experts and from political representatives. Close working relationships between the personnel from different institutions ensured effective and less time-consuming implementation.
- *Economic resources*. This was evaluated with moderate influence mainly because the availability or not of economic resources did not influence the need for a timely disaster response.
- *Accountability*. This is assessed on upper part of the scale, partially because fulfilment of the reporting requirements influenced how fast the resources would be reimbursed from Coordinating Authority to Executive Bodies.

- *Public procurement.* This is a further factor evaluated as a highly influential but with negative connotation, because the time required for tendering a contractor could jeopardize the smooth implementation of on-going projects.
- *Time needed for transfer of funding* is evaluated as having limited influence mostly because the operations were retrospective. The implementing bodies had already incurred costs, even before signing a grant contract, and at the moment of implementation they did not need financial resources exactly for that particular disaster response. However, because the funds for disaster aftermath activities were very limited, reimbursement of expenses was highly appreciated by the relevant institutions.
- *Lack of specific competences* for managing an emergency at municipal level could be highly influential factor, especially in small municipalities, which did not have experience with EU financed projects.

6. ADMINISTRATIVE BURDEN AND COST

Overall, the interviews with public authorities highlighted the administrative burden as moderate to limited (see Table 10). The representatives from the Coordinating Authority did not regard the management verification procedures as proportional to the amount of aid disbursed. However, this seems to be less of a problem for the Executive Bodies.

Table 10: Assessment of administrative burdens

Administrative burdens	Minimal	Limited	Moderate	Significant	Excessive
National Coordinator		X			
Coordinating Authority			X		
Coordinating Authority				X	
Coordinating Authority			X		
Local implementation body		X			
Local implementation body		X			
Other public implementation body	X				

Note: Assessment based on seven interview respondents.

Institutions involved in EUSF intervention assessed their administrative costs associated with the implementation as minimal or limited (see Table 11), certainly at the level of Executive Bodies. For those involved in the higher level tasks, the opinion was less positive, considering that the costs were 'moderate'.

Table 11: Assessment of administrative costs

Administrative cost	Minimal	Limited	Moderate	Significant	Excessive
National Coordinator			X		
Coordinating Authority			X		
Coordinating Authority			X		
Coordinating Authority	X				
Local implementation body		X			
Local implementation body		X			
Other public implementation body	X				

Note: Assessment based on seven interview respondents.

7. RELEVANCE OF EUSF SUPPORT

All the interviewees agreed that the EUSF support has a high relevance to local needs and financial constraints that local authorities face. According to them, all types of activities or expenses that are associated with aftermath of disasters were eligible; the eligibility rules were considered as comprehensive and overarching.

- *Appropriateness to specific local needs.* The most urgent local needs were related to restoration of basic working condition of infrastructure and cleaning-up. Temporary accommodation of the population was typically arranged by local authorities, NGOs and business as expressions of solidarity. Executive Bodies agreed that the eligibility requirements EUSF to support only "restoration activity" was sometimes a problem because the infrastructure is so badly damaged that it need to be completely reconstructed, not just restored. However, they recognized that EUSF is immediate financial support not a policy financing instrument.
- *Support to local authorities facing financial constraints.* Local authorities faced significant financial constraints during the disaster aftermath. In order to cover the immediate needs they transferred resources between budget items. This practice led to some policies being underfinanced. Within this context, the EUSF support was very much appreciated because it helped the local authorities partially to cover their costs. It was difficult for local authorities to mobilize other resources, either national or EU, to cover the total amount of damages as a result of severe winter conditions during early 2015. Even for Burgas municipality, which is among the biggest in Bulgaria, it is likely to take several years to completely repair the damage experienced.

8. ASSESSMENT OF ACHIEVEMENTS

8.1 Operational achievements

All interviewees agreed that the operational achievements were significant. Most of the financial support covered the restoration of infrastructure to working order (82.6 percent). All activities achieved the envisaged results. In second place was the securing of preventive infrastructure and cultural heritage (15.6 percent), which was also evaluated as having high significance. Although, the EUSF aim is to support authorities' immediate disaster response, interviewed agreed that even some restoration activities have a preventive effect - restoration of water networks or cleaning up the river beds, for example.

The qualitative information provided in the Implementation Report (Annex II) records the following operational achievements of the EUSF support:

- river bleach cleansing, restoration of drain channels – 10,254 m;
- removal of sediment, rocks and ground – 39,233 m³;
- restoration of preventive infrastructure – 25 facilities;
- re-opening of 57 roads re-open;
- restoration of asphalt and sidewalk paving – 57,911 m².

Table 12: Assessment of operational achievements

Activity	Not significant	Limited significance	Moderate significance	High significance	Most significance
Restoration of infrastructure to working order					X
Temporary accommodation & rescue for population					
Securing of preventative infrastructure & cult. heritage				X	
Immediate clean-up of disaster areas					X

Note: Assessment based on nine interview respondents

8.2 Added Value

The added value of the EUSF support is regarded primarily in the economic sphere and learning opportunities, although there are important political and operational aspects (see Table 13).

- *Economic added value.* The EUSF support was considered to be crucial financial help mainly for local authorities. Repaid assistance allowed them to reuse their scarce resources for further activities in order to restore completely damaged infrastructure. The tight deadlines and eligibility rules helped all involved institutions to work much more effectively together.
- *Learning added value.* The logic of intervention helped institutions to organize themselves better and to increase the knowledge and skills of their personnel. The implementation of EUSF intervention in small municipalities, which had limited experience with EU financed projects, benefited much more in learning and operational experience, than regional public authorities such as Burgas municipality which had implemented 37 projects, financed by ESIF with EUR 177 million during the programming period 2007-2013. By comparison, the municipality of Kirkovo had implemented only four ESIF projects for approximately EUR 952,000.
- *Political, operational and policy added value.* Interviewees agreed that EUSF has a moderate significance from a political point of view: it helped to enhance the visibility of EU mostly at local level. Due to institutional arrangements, local authorities do not generally have direct contact with the EU level. Representatives of Executive Bodies noted that the first time they prepared and submitted applications for EUSF support was the most challenging. Each successive application made the process of project implementation much easier and smoother. This applied especially in the pre-submission phase, when fast and well organized institutional responses are very important.

From a policy point of view, there was limited added value of EUSF support, because the emphasis is not on policy, but on immediate response. Some

supported activities, such as cleaning-up rivers' beds and restoration of water infrastructure, had a prevention impact, but this impact was limited.

Table 13: Assessment of added value

	Not significant	Limited significance	Moderate significance	High significance	Most significance
Economic				X	
Political			X		
Policy		X			
Operational			X		
Learning				X	

Note: Assessment based on nine interview respondents.

9. SYNERGIES AND COMPLEMENTARITY WITH ESIF

The framework for disaster prevention and management (DPM) in Bulgaria is headed by the Ministry of Interior, through its General Directorate 'Fire Safety and Protection of the Population' (GDFSPP) which has the most important operational DPM role. In accordance with the 2014 Law for Protection Against Disasters (LPAD), the General Directorate is responsible for the coordination and management of rescue and emergency restoration works, through its 28 operational centres. The preventive DPM activities of the GDFSPP include:

- research, analysis, assessment and forecasting of the risks of disasters;
- categorization of the territory of the country depending on the risks under item 1;
- planning of disaster protection;
- implementation of preventive measures to prevent or reduce the consequences of disasters;
- adoption of a National Programme for Protection against Disasters and annual plans for its implementation; and
- disaster prevention control.

In 2016, a Committee for the Reduction of Disaster Risks to the Council of Ministers was set up by Ministerial Council Decree. The Committee is a permanent body functioning as a national platform for the risk reduction of disasters in compliance with the Hyogo Framework for Action 2005-2015 and the Sendai Framework for Disaster Risk Reduction 2015-2030 (agreed by 187 UN Member States in March 2015). A major responsibility of the Committee is the development of a National Programme for the risk reduction of disasters and yearly plans in accordance with LPAD. Financing of the activities is through the budget of GDFSPP.

ESIF financed measures for DPM are included in the following national Operational Programmes for 2014 – 2020.

The OP Environment, managed by the Ministry of Environment and Water (MoEW), has prioritized measures for DPM and has envisaged investments in this sphere. To meet the country's commitments under the Directive 2007/60 / EC, Priority Axis 4 'Prevention and Management of Flood Risk and landslides' of the OP, funds amounting to c. EUR 66.75 million will be invested in:

- creation of a National Water Management System in real time;
- measures to implement risk prevention and management solutions
- floods, incl. ecosystem based solutions;
- establishing six population awareness centers for adequate response to floods;
- implementation of studies and evaluations in relation to second Flood Risk Management Plans for the period 2021-2027;
- measures to prevent and manage the risk of landslides; and
- implementation of demonstration / pilot projects and information campaigns related to preventive measures, flood risk management and landslides.

Under the Rural Development Programme, the Ministry of Agriculture, Foods and Forestry has envisaged DPM measures to be implemented by the State Fund Agriculture. Under measure M08 (Investing in forestry development and improving the viability of forests - Articles 21-26 of the RDP), funds of c. EUR 25 million are being allocated to aid to prevent and restore forest damage from forest fires, natural disasters, adverse climatic events and plant pests, and catastrophic events.

The interview research indicated that the EUSF is regarded as a reactive 'solidarity mechanism' in response to calamities in Member States and accession countries, and is not seen as a tool for investment in preventive infrastructure or disaster prevention and management systems (although it is acknowledged that some EUSF-funded interventions have a preventive effect - cleaning up rivers, correcting / restoring drainage infrastructure etc).

Thus, there is perceived complementarity between EUSF and ESIF support, the first reacting to emergency situations (immediate rescue and reconstruction measures) while the second supports regional development providing the possibility of developing prevention measures for the future of immediate rescue and reconstruction measures. However, coherence in practice – governance, thematic focus, spatial coverage, joint projects – is regarded as rather weak. While there are a number of ESIF measures being undertaken in the sphere of prevention, preparedness and recovery (as noted above), their implementation is still in progress, so their relevance in avoiding or ameliorating future EUSF support cannot yet be assessed. It is clear though from the assessment of DPM needs noted earlier in this report, that the planned national and ESIF resources are insufficient to cover all necessary measures planned to reduce disaster risk.

The interview research found both instruments are assessed positively but have different and distinctive roles – one for the solidarity of the Union and ESIF for providing additional means to national measures for DPM development and implementation. Insofar as there are synergies (unplanned) between EUSF and ESIF, they occur in the

above-mentioned role of the EUSF in cleaning up rivers and correcting / restoring drainage infrastructure, contributing to national and EU policy goals for DPM, notably the reduction of future risks.

10. LESSONS LEARNED

The overall assessment of the experience of the EUSF intervention was broadly considered to be positive by the interviewees consulted for the research at different levels (see Table 14). Examining the lessons learned in more detail, the following points can be made to elaborate on the rankings in the table.

Table 14: Overall assessment of administrative lessons learned

Activity	Very negative	Negative	Neutral	Positive	Very positive
Application process				X	
Information on how to apply				X	
Support by the Commission					X
Extent of administrative demand				X	
Reporting requirements				X	
Overall experience of dealing with EUSF				X	

Note: Assessment based on seven interview respondents.

First, there is little evidence of 'spillover' effects of EUSF principles and processes on domestic disaster aftermath managements, probably because during the last 20 years Bulgarian institutions and processes management were re-designed following EU principles and eligibility rules. The same project principle is followed for distributing national financing for disaster response. Notwithstanding the above, some fine-tuning was introduced in the process of disaster evaluation for better organization during the first days after the disaster.

Second, the local authorities faced some difficulties in timely assessment of damages, especially those related with private property. Although the application process is straight-forward, the 12-week period threshold is a time constraint.

Third, the period between submission of the application and the final decision of Commission is regarded as long. In the Bulgarian case this was more than six months. Shortening this period would help to address the financial constraints of local authorities immediately after the disaster and lead to increased EUSF visibility and solidarity effects. One possible direction for such optimization could be increasing the advance payment to 70 or 80 per cent of approved application paid by the Commission to the national authority.¹⁰ The same procedure has to be introduced at national level also in order to be effective. It is important, for speeding up the process, that the Coordinating Authority

¹⁰ The Internal Security Fund has such rules and could be used as a good practice.

has the opportunity to sign a pre-grant agreement with Implementation bodies after the list of projects is prioritized and the award decision is issued by Commission. In the view of Bulgarian authorities, there is no perceived risk for such a change, because more than half of the operations are retrospective. The balance would be made with the final payment according to the scope of final grant agreement signed. The time that could be saved was estimated between nine and twelve months.

Fourth, the scope of eligibility operations should be extended in order to address the consequences of climate change, namely the increased frequency and size of disasters. The eligible operations should include building a new or improving the damaged preventive infrastructure in some specific cases where the need for its construction has arisen as a result of the disaster or as a necessary accompanying activity to restoration another type of infrastructure. This modernization of rules would help to enhance the economic added value of EUSF support.

Fifth, for the implementation phase, tendering time is crucial because it may jeopardize on-going project implementation and the local authority's capacity, especially if the municipalities are small or do not have experience with EU funded projects.

Finally, based on their experience, the Coordinating Authority and National Coordinator proposed - alongside major and regional disasters - that the Commission should consider introducing a 'local disaster' type. The nature of many disasters is that they have a destructive local effect and the estimated damages are not enough to mobilize a regional criterion response aid.

11. REFERENCES

Documents

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Main web-sites

Ministry of Regional Developments and Public Work, <http://www.bgregio.eu/normativna-baza/fond-solidarnost.aspx>

Ministry of Interior's GD "Fire Safety and Protection of the Population", <https://www.mvr.bg/gdpbzn/info-center>

12 ANNEX: METHODOLOGY OF THE CASE STUDY RESEARCH

Methodology

The research was undertaken using mainly qualitative methods for collecting information. After the analysis of institutional frameworks, the research team conducted in-depth interviews with the Coordinating Authority level and Executive Bodies. Burgas municipality was selected as representative of local authorities because they had the major projects supported.

The citizens' point of view was evaluated using focus-group discussion. The focus group was organized on 14 August in Burgas Municipality. The Municipality was selected because they implemented the biggest project among execution bodies. Eight citizens participated in the group discussion. They were recruited because they had personal impressions from severe winter conditions at January-February 2015. In addition, two interviews were conducted with representatives of a local NGO and a journalist.

Interviews

Institution	Type of institution	Name of interviewee	Date
Ministry of regional development and public works	National Coordinator		28 August 2018
"Strategic planning and programmes for regional development" General Directorate within the Ministry of regional development and public works.	Coordinating Authority		10 August 2018
"Strategic planning and programmes for regional development" General Directorate within the Ministry of regional development and public works	Coordinating Authority		10 August 2018
"Strategic planning and programmes for regional development" General Directorate within the Ministry of regional development and public works	Coordinating Authority		10 August 2018
Municipality Burgas	Executive Body		14 August 2018
Municipality Burgas	Executive Body		14 August 2018
Road Infrastructure Agency	Executive Body		23 August 2018
Stakeholder	Newspaper Burgaski Far		22 August 2018
Stakeholder	NGO, Red Cross		14 August 2018

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