



MINISTRY OF REGIONAL
DEVELOPMENT AND
PUBLIC WORKS



REPUBLIC OF SERBIA
MINISTRY OF EUROPEAN INTEGRATION

DECISION No.02
of 16 September 2020

approving of the Territorial analysis for Republic of Bulgaria and Republic of Serbia Cross-border Area

based on the provisions of article 4, points d), e) and f) of the Rules of Procedure of the **Joint Working Group** for Programming of Cross-border cooperation Programme between Republic of Bulgaria and Republic of Serbia 2021-2027, **has adopted this:**

DECISION

Article 1 – The Joint Working Group approves the Territorial analysis for Republic of Bulgaria and Republic of Serbia Cross-border Area including SWOT analysis and conclusions.

Article 2 - The Territorial analysis for Republic of Bulgaria and Republic of Serbia Cross-border Area including SWOT analysis and conclusions, and Table with comments of members/observers of the Joint working Group are enclosed and are part of this decision.

Article 3 – The Joint Working Group gives mandate to the Managing Authority and National Authority to elaborate and present proposal for intervention logic based on the conclusions of the Territorial analysis for Republic of Bulgaria and Republic of Serbia Cross-border Area.

Chair

Denitsa NIKOLOVA

Deputy Minister

**Ministry of Regional Development
and Public Works, Republic of Bulgaria**

Co-Chair

Mihajilo DAŠIĆ

Assistant Minister

**Ministry of European Integration,
Republic of Serbia**

TABLE WITH COMMENTS
 received by JWG members/observers on written procedure for approval of the Territorial analysis for Republic of Bulgaria and Republic of Serbia
 Cross-border Area in the framework of programming Republic of Bulgaria- Republic of Serbia 2021-2027

Member/observer of JWG /Institution	Comments/remarks	Justification
Academic council - Council of the Rectors in the Republic of Bulgaria	Approves the proposal with recommendations for corrections concerning small part of the text under point 2.7.2. Territorial analysis, p.2.7. Environment, p. 2.7.2. Water and Soils (pages 73-74)	<p>The recommendation is accepted.</p> <p>Additional information in the text under point 2.7.2. Water and Soils is introduced (in italic), as follows: <i>“The soil cover in the programme area is also characterized by significant variety: from forest soil in the mountain areas to alluvial soils in the river valleys which provides favourable conditions for agriculture (cereals, fruit and vegetable crops). Soil erosion is a natural process, occurring over geological time. Most concerns about erosion are related to accelerated erosion, where the natural rate has been significantly increased by human action.</i></p> <p>Soil erosion is recognized as one of the major soil degradation processes on the territory of Bulgaria. Water erosion affects approximately 40% of the country territory while wind erosion (in plains and deforested areas) affects approximately 15% of the country territory. The highest relative risk for water erosion of agricultural soils exists for the cropland in the areas of Sofia with an average forecast intensity of 10-12 t/ha per year, followed by the areas of Kyustendil (5-8 t/ha per year) and . <i>The highest relative risk of wind erosion exists for the cropland in the areas of Vratsa (50-60% of the areas), followed by Vidin and Montana (40-50% of the areas).” (page 73-74)</i></p>
Ministry of Education and Science, Republic of Bulgaria	Territorial analysis, p.2.6. Social Development, p.2.6.1. Education, text “According to Eurostat, the share of early school leavers in the EU-28 in 2017 is 10.6% and in Republic of Bulgaria it is 12.7%, with a positive trend compared to the previous two years - 2015 (13.4%) and 2016 (13.8%).“ (page 61) – recommendation on providing information for early school leavers according to Eurostat (p. 2.6.1) for 2018	<p>The recommendation is accepted</p> <p>The text under point 2.6.1. “Education” is supplemented accordingly: <i>“According to Eurostat, the share of early school leavers in the EU-28 in 2018 was 10.6% and in the Republic of Bulgaria it was 12.7%, with a positive trend compared to the previous years - 2015 (13.4%) and 2016 (13.8%).” (page 61)</i></p>
Science and Education for Smart Growth Operational Programme Executive Agency – Managing	Approves the proposal without objections and recommendations concerning the analysis.	Not applicable.

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<p>Authority of Science and Education for Smart Growth OP 2014-2020, Republic of Bulgaria Ministry of Environment and Water (MEW), Republic of Bulgaria</p>	<p>Comments/additional texts/corrections are proposed for page 78 and 79:</p> <ol style="list-style-type: none"> 1. On the page 78 in the end 2019 the current number of protected areas in Bulgaria is 1017. In this case we proposed the number to be corrected from 1015 to 1017. We proposed the following sentence to be revised with additional text as follows: <i>"Their total area gradually increased from 5.2% in 2007 to 5.3% in 2014, and that percentage remained unchanged in 2016 when the total number of protected areas is 1012"</i>. 2. On the page 79 the text <i>"364 natural landmarks"</i> should be replaced with <i>"345 natural monuments"</i>. Furthermore the text <i>"Other protected sites are the Seven Lakes of Rila, and the Stob Pyramids."</i> should be supplemented with explanations about category of the protected areas. 	<p>The recommendations are accepted and the Territorial analysis was revised accordingly:</p> <ol style="list-style-type: none"> 1. The provided comments of technical nature have been taken into consideration. The remarks were accepted and the text was changed. 2. The provided comments of technical nature have been taken into consideration. The remarks were accepted and the text was added.
<p>Non-profit legal entities working for the public benefit in the field of education, science and culture (Free Youth Center)</p>	<p>Opinion Having read the provided Analysis and its recommendations, we would like to draw attention to the following: 1. As we know, the overarching objective of European Territorial Cooperation is to promote a harmonious economic, social and territorial development of the Union as a whole. In European documents, along with priorities such as the smart economy, green technologies and connectivity, no less attention is paid to a "More social Europe". In this regard, the challenges of the next decade, European institutions identify the development of democracy, effective administration, youth and civil society... Similarly, in the SWOT made in the provided document we also see a number of common unresolved social problems in border areas, such as the risk of poverty and social exclusion, young people leaving, insufficient health services (especially in light of the COVID 19</p>	<p>1. The comment is not grounded. The fact that the PO 4 "More social Europe" is not included in the conclusions is not a valid argument that the social sphere is excluded. On the contrary, based on the socio-economic and SWOT analysis the social factor together with the economic and environmental one will be considered during the development of the cross-border territorial strategy for integrated measures under PO5 "Europe closer to citizens" as required by the regulations and by the concept of the integrated approach. PO 5 "Europe closer to citizens" main advantage is to allow combination of measures typical for all the rest of the policy objectives in an integrated manner.</p>

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Cross-border Area in the framework of programming Republic of Bulgaria- Republic of Serbia 2021-2027

<p>pandemic), etc. In contrast to what has been said so far, in the recommendations of the Analysis, the SOCIALS SPHERE SEEMS COMPLETELY EXCLUDED. It is not clear why this was done. Moreover, it is not clear enough why these priorities were chosen and not others for which there are also sufficient grounds (with exception of "Enhancing the growth and competitiveness of SMEs", where there has been some neglect in previous periods).</p>	<p>The target groups will be determined within the territorial strategy itself, therefore no local actor (including the civil society) is excluded at the moment, as the strategy is not drafted yet. The non-governmental organizations however should seek mutual solutions with other stakeholders of the programme area, to work together and apply integrated measures for the benefit of the whole CBC region which will be the guiding principle of the implementation of the territorial strategy.</p> <p>The comprehensive justification for the proposal of each priority will be presented at the next stage within the logic of interventions under the programme. The justification will be supported by lessons learnt from the previous and current programming periods and the results of the regional consultations.</p>
<p>2. In our opinion, no convincing argument has been made in the recommendations on the priority "Integrated measures for sustainable development of the CBC region" and, even more importantly, what content is included in it. Is "sustainable development" limited to the fight against climate change and development of green economy, or is it understood more broadly, including also provision of social security? We will point out that at the moment people in both countries protested on the streets, not because carbon emissions have increased. We will point also that "sustainable development" is a constant horizontal principle and is implemented in most projects anyway, which may not require its formation as a special priority.</p>	<p>2. According to art. 3 (1) of the draft Interreg regulation for the programming period 2021-2027 the overarching principle of the cross-border cooperation programmes is to promote integrated regional development. In addition based on the experience from two consecutive periods it is important that the uncoordinated, dot-like investments are avoided and more integrated territorial approaches based on the local strategies, needs and competitive advantages of the region is be applied that corresponds to the limited financial resources of the programme.</p> <p>The name of the priority in the conclusions is adjusted to comply with the definition of draft Common provisions regulation namely Europe closer to citizens - sustainable and integrated territorial development of the CBC region.</p> <p>The comprehensive justification for the proposal of each priority will be presented at the next stage within the logic of interventions under the programme. The justification will be supported by lessons learnt from the previous and current programming periods and the results of the regional consultations.</p>
	<p>The name of the priority in the conclusions is adjusted to comply with the definition of draft Common provisions regulation namely Europe closer to citizens - sustainable and integrated territorial development of the CBC region.</p> <p>The comprehensive justification for the proposal of each priority will be presented at the next stage within the logic of interventions under the programme. The justification will be supported by lessons learnt from the previous and current programming periods and the results of the regional consultations.</p>

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	<p>3. The third priority „Strengthening disaster resilience in the CBC region“ focuses on development of collaboration of professional units. The modern European and world practice in this field is rather to increase the resource for dealing with disasters by doing prevention, preparing the population, developing volunteering... The latter for example is an unresolved issue in Bulgaria and Serbia, where abandonment is reported compared to developed countries. We think that this priority should be approached more broadly, without limiting the Programme interventions only to professionals and specialized public institutions. In conclusion, I want to say that the identified priorities predetermine as beneficiaries of the Programme exclusively public institutions and businesses. As a representative of non-governmental organizations observing Joint Working Group work, I think that if the Analyse and its recommendations will be adopted without edition, there is a big risk the CIVIL SOCIETY STRUCTURES IN THE REGION TO BE EXCLUDED from Bulgaria-Serbia cross-border cooperation, which will negatively affect the Programme implementation and will be in conflict with declared principle "Europe closer to the citizens"</p>	<p>3. Additional information is added regarding target groups and future beneficiaries. The comprehensive justification for the proposal of each priority, including beneficiaries and target groups, will be presented at the next stage of the programming within the logic of interventions under the programme. The justification will be supported by lessons learnt from the previous and current programming periods and the results of the regional consultations.</p>
<p>Ministry of Construction, Transport and infrastructure, Republic of Serbia (MCTI)</p>	<p>Comments/additional texts/corrections are proposed for page 15, 29, 35, 50, 87, 89, 90, 101, 110 and 112 provided on 24 of July 2020:</p> <ol style="list-style-type: none"> 1. On the page 15 is written following comment: "The same amount will be assured also by EIB. Missing info from the Annex to the Communication on the European Green Deal Roadmap - Key actions on the development of Green Agenda for the Western Balkans (Action: The EU as a global leader)." 2. On page 29 is written following comment: "Missing: Gamzigradska banja, Sokobanja, Brestovačka banja, Prolom banja, Lukovska banja, Kuršumlijska banja, Sijarinska banja and Bujanovačka banja." 	<p>The recommendations are partially accepted and the Territorial analysis was revised accordingly (where appropriate):</p> <ol style="list-style-type: none"> 1. <i>The recommendation is not accepted. The text in this section gives only reference to EU level documents and legal framework which are not subject to discussion.</i> 2. The provided comments of technical nature have been taken into consideration. The remarks were accepted and the text was added. 3. <i>The recommendation is not accepted - the Roma population is not a separate target group but a part of the whole population of the CBC region therefore no reference to this specific ethnic group is necessary.</i>

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	<p>3. On page 35 is written the following comments: "There is no reference to the specific status of Roma population and the relevant EU frameworks/aid."</p> <p>4. On page 50 is written the following comment: "There should be more info on regional specifics than national ones (destinations, tourist products, UNESCO heritage etc. within the Serbian part of CBC) evaluated and foreseen by the same Strategy."</p> <p>5. On page 87 is written the following comment: "No info on A4 Motorway (Niš - Bulgarian border) that is being completed. Some sections of A1 Motorway (Belgrade - Macedonian border) are also new."</p> <p>6. On page 89 is written following comment: "Missing info on the reconstruction of the railroad section Niš - Brestovac from EU funds (http://www.ppf.rs/en/projects/ppf8-ni-brestovac-rail/)."</p> <p>7. On page 90 is written following comment: "Mistake/wrong. Eurovelo 6 is being developed along the Danube on both Serbian and Bulgarian side (https://en.eurovelo.com/ev6/serbia). District of Bor is very much concerned in this respect."</p> <p>8. On page 101 is written following text: "Neolithic (also discovery of the jaw of a hominin in Mala Balanica, Sicevo)"</p> <p>9. On page 110 is written following comment: "Old data... Erase Montenegro."</p> <p>10. On page 112 is written following comment: "Iron Gate has been awarded the status of UNESCO Global Geoparks recently"</p> <p>Comments/additional texts/corrections are proposed for page 94, 106 and 115 provided on 14 of September 2020:</p> <p>1. On the page 94 of the revised document there is still a paragraph that most likely refers to the CBC program between Bulgaria and Northern Macedonia, and that should therefore be deleted.</p>	<p>4. The provided comments of technical nature have been taken into consideration. The remarks were accepted and the text was added.</p> <p>5. The provided comments of technical nature have been taken into consideration. The remarks were accepted and the text was added.</p> <p>6. The provided comments of technical nature have been taken into consideration. The remarks were accepted and the text was added.</p> <p>7. The provided comments of technical nature have been taken into consideration. The remarks were accepted and additional information concerning Eurovelo 6 was added.</p> <p>8. The provided comments of technical nature have been taken into consideration. The remarks were accepted and the text was revised accordingly.</p> <p>9. The provided comments of technical nature have been taken into consideration. The remarks were accepted and the text was revised accordingly.</p> <p>10. The provided comments of technical nature have been taken into consideration. The remarks were accepted and the text was revised accordingly.</p> <p>The recommendations are accepted and the Territorial analysis was revised accordingly:</p> <p>1. The provided comments of technical nature have been taken into consideration. The remarks were accepted and the text was deleted.</p>
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	<p>2. By inserting the Neolithic behind the Thracian culture on the page 106 of the revised document, the historical sequence of cultures that left significant traces in the CBC area was disturbed. Proposed revised: <i>“Neolithic, Thracian, Roman, Byzantine and Medieval cultures have piled up assets in many objects and museum artefacts.”</i></p> <p>3. On the page 115 of the revised document, Montenegro should be erased/deleted as it became an independent state in 2006 and has therefore nothing to do with the CBC area. Proposed revised: <i>“Tchoupréné Biosphere Reserve is situated on the northern slopes of the Stara Planina on the Serbia’s border in north-west Bulgaria.”</i></p>	<p>2. The provided comments of technical nature have been taken into consideration. The remarks were accepted and the text was changed.</p> <p>3. The provided comments of technical nature have been taken into consideration. The remarks were accepted and the text was changed.</p>
Pčinja District	<p>Agreed with the proposed the Territorial Analysis for Republic of Bulgaria – Republic of Serbia Cross – border Area.</p> <p>They have similar comments with the ones proposed by the Ministry of Construction, Transport and Infrastructure of the Republic of Serbia (MCTI), which were adopted.</p>	<p>The document is very well done and provides a good overview of the Program area.</p>
AFTER DEADLINE		
Regional Development Agency Eastern Serbia	<p>Please find some comments on draft Territorial analysis for Republic of Bulgaria and Republic of Serbia Cross-border Area.</p> <p>In general, document is very well done and provide and good overview on Program area.</p> <p>Still, there are few comments which could be useful to have even better document and better Program later one:</p> <p>1) Rural</p> <p>While reading carefully the document it seems that activities and opportunities related to „rural“ are missing somehow. The whole region is predominantly rural and some of the “rural” issues are mentioned in the text (employment in rural areas, rural remote areas etc.) as problems or issues to be solved. But, there are no proposed “rural related” activities in the text; SWOT analyses contain word</p>	<p>1) Regarding the comment concerning rural/urban areas:</p> <p>The analysis is not separated into “rural” and “urban” areas, as it covers all types of territories in a comprehensive manner within the eligible programme area.</p> <p>2) Regarding the comment concerning SMEs:</p> <p>The recommendation is not accepted. The purpose of the current document is to provide analysis of the relevant sector and to identify trends and potentials. Describing existing support for SMEs therefore is not a subject of the territorial analysis, but rather of the logic of interventions, including the lessons learnt and the result to build upon, which is the next step in the programming process.</p>

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	<p>“rural” only among threats, it doesn’t contain the word “rural” among opportunities etc. It will be good to have more attention and action on huge majority of the territory. Environment Reading the document and SWOT analysis one can expect that priority for Policy objective 2. A greener, low-carbon Europe will be defined as: Promoting climate change adaptation. risk prevention and disaster resilience. Just like SO 2.4 says. Instead, related priority seems to be defined as: Strengthening disaster resilience in the CBC region. All the date presented, SWOT analyses, clearly point that there are three key issues to be targeted within Program: climate change adaptation, risk prevention and disaster resilience. It seems as better solution to define this priority as: Promoting climate change adaptation, risk prevention and disaster resilience.</p> <p>2) 2.4.6. Small and medium-sized enterprises (SMEs) It will be good to mention existing support for SME, in this part of document and in SWOT analyse as well. On both side of borders, there are different Business support organisation which providing support to entrepreneurship and SME, like: Chamber of commerce, Regional Development Agencies, Business Incubators, Agriculture Support Service etc. Their role in supporting entrepreneurship and SME in future Program could be rather important. The same apply for States incentives and subsidies.</p> <p>3) 2.7.2. Water and soils It will be good to add some more issues relevant for soil, like:</p> <ul style="list-style-type: none"> • Lack of awareness about the need for environmental protection in general. • Links between agriculture -- soil protection -- climate change. Due to big dependence on agriculture production and large 	<p>3) Regarding the comment concerning Water and soils: Additional information in the text under point 2.7.2. Water and Soils is introduced. The major issues concerning soil erosion and other environmental risks are presented in the Territorial analysis.</p> <p>4) Regarding the comment concerning Youth entrepreneurship: Identification of the key target groups, stakeholders and potential beneficiaries is subject to further discussions and will be done in the respective sections of the draft programme document.</p> <p>In addition, the territorial analysis tackles youth entrepreneurship since population aging is one of the major challenges which border area faces and lessons learned from the previous periods in that aspect are also available.</p>
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	<p>areas under agriculture production, it is one of the biggest threat to environment and climate change in Program area.</p> <p>4) 2.6.2. Youth entrepreneurship Why to limit "entrepreneurship" only for Youth? What about woman? Or people who will lose their jobs due to COVID 19 pandemic? Why not to include rural entrepreneurial activities (small food and beverage processing, wine production, tourism, different agricultural services, etc). Why not to include small crafts, beside business, they are important for cultural heritage as well. What about social entrepreneurship? It will be good to take a broader picture on entrepreneurship. Such approach may definitely put "entrepreneurship" as a good, real and relevant opportunity in SWOT analyse as well. Support to entrepreneurship has to be integral part of future priority "Enhancing growth and competitiveness of SMEs". Such a "small business" are of the greatest importance for predominantly rural area like Program area is.</p>	
Nationally representative employers' organisations, which are approved by the Council of Ministers in accordance of Labor code (Republic of Bulgaria)	Approves the proposal without objections and recommendations concerning the analysis.	Not applicable.