Monitoring Roma inclusion in Community-Led Local Development (CLLD) in Bulgaria

Study conducted by Integro Association

Aims of the research

The CLLD approach implemented under the Rural Development Program is one of the most important existing instruments relevant to the social inclusion of vulnerable communities at local level during the current programming period.

The purpose of this study is to track the implementation of the CLLD strategies in 4 LAG territories. The study is conducted in two directions. On the one hand, to monitor the overall implementation of strategies, difficulties encountered, causes of delay, threats, and more. On the other hand, to assess their immediate impact on the Roma and other vulnerable groups living in the territory of LAG.

Although the implementation of the strategies had to start still in 2016, we are seeing a very serious delay in the launch of the measures of the strategies at the local level, which often creates a risk for 100% implementation of the measures envisaged. Failure to implement the measures will, in turn, lead to insufficient impact on target groups at the local level - business, public authorities, civic organizations, vulnerable communities, etc.

Regarding the Roma, it is necessary to examine their involvement in the implementation of strategies at present. As a tool for the social inclusion of vulnerable communities in society, expectations have been created that the CLLD approach will improve the status of the Roma community. These expectations are valid because the LAGs with multi-fund strategies using ESF funds have measures targeting the Roma.

The main findings and recommendations of this study will enable civil society organizations working for Roma social inclusion to advocate for a more effective implementation of the approach, on the one hand, and on the other hand - for recommendations to European and national regulatory authorities, to eliminate the factors hampering the implementation of local strategies.

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The survey will provide feedback to institutions relevant to the implementation of the CLLD approach through which they can optimize or evaluate their performance.

When selecting the LAGs on which territory to conduct the study, it was considered that the LAGs had strategies with different characteristics. LAG was selected with a multi-fund strategy including ESF funds, LAG with a multi-fund strategy without ESF funds, LAG with a single-fund strategy, LAG implementing a strategy for the first time, LAG planning its strategy with the active involvement of the local Roma community and others.

For the purposes of the present study was a review of existing information materials concerning the approach CLLD that in - mostly made of the MA Program for Rural Development 2014 - 2020. In addition to information published by the managing authority was reviewed and published Local development strategies of LAGs included in the study. As an additional method of gathering information held semi-structured interviews with representatives of LAGs, local Roma NGOs and activists.

General information on the implementation of CLLD strategies in Bulgaria

For the first time, the CLLD approach (under the then name LIDER) was implemented in Bulgaria during the 2007-2013 programming period, under the Rural Development Program, which was the only program from which measures under the strategies of the LAG could be financed. This was the period when the operational programs were something new for Bulgaria and this type of financial instruments other than the pre-accession funds were first implemented.

As a result of the implementation of the approach, 35 LAG strategies were funded. The total budget earmarked for the implementation of the strategies amounted to around EUR 53 million.

During the current programming period, major changes were made to the rules for the implementation of the CLLD approach. The changes introduced were towards a broader and more effective implementation of the approach. The most significant changes were related to:

- A possibility has been established to create Local Development Strategies in the territories of two and three municipalities. There were opportunities for two or three municipalities with common borders to create a common strategy to apply for funding. Association between neighboring municipalities brought additional points in the evaluation, with the highest rating being the association between 3 municipalities and the lowest - the implementation of a strategy on the territory of one municipality. In addition to being able to receive a higher grade, there was, of course, the fact that in case of common strategy the resource is distributed over a larger territory and a larger population, because of that part of the LAGs decided to develop stand-alone strategies.
- For the first time, when developing their strategies, the LAGs were able to use resources from other operational programs. In each strategy, funding measures could be planned from: the Rural Development Program; The Maritime and Fisheries

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Operational Program; the Environment Operational Program, the Innovation and Competitiveness Operational Program; the Science and Education for Intelligent Growth Operational Program; the Human Resources Development Program;
The combination of measures from all the above mentioned programs practically enabled the financial resources for each strategy to reach BGN 6 000 000 /about EUR 3 000 000 /. The only condition was that funds to manage strategies could not be used outside of the Rural Development Program.
In addition to increasing the financial resources at the strategy level, overall, more financial resources were allocated to the Rural Development Program. If the LAG's funded strategies were 35 in the last programming period, they are now twice as many. The inclusion of funding from other operational programs has enabled the CLLD approach and bottom-up planning to be implemented outside the Rural Development Program.

- In order to ensure the social inclusion of vulnerable communities and the involvement of all communities in the LAG's territory, additional points have been awarded in evaluating strategies if social inclusion measures are included. This made it possible to target the Roma as a vulnerable group. A prerequisite for inclusion was created at all stages of the process and required specific measures to engage them.

Response from the implementation of local development strategies at the local level

LAG „Byala Slatina“

Byala Slatina is located in North-West Bulgaria and is a part of the territory of Vratsa Region. This region is known as the poorest region in the whole Europe. Byala Slatina lays in the category of rural region. According to the last census the total population in Byala Slatina municipality counts around 24 500, and 3 000 of these are of Roma origin.

Characteristic of Byala Slatina is the lack of industry. There are small enterprises for the production and processing of textiles. Labor migration is at a very high level, leading to depopulation of the municipality and the whole region.

LAG Byala Slatina is working on the CLLD approach for the first time during the current programming period. They have an approved strategy that includes measures from the Rural Development Program and the Innovation and Competitiveness Program. The availability of funding outside the Rural Development Program makes the strategy multi-funded. The implementation of the strategy started in 2018. So far, they have implemented measures aimed at farmers and agricultural companies.

With regard to the difficulties encountered, one of the most significant problems seen by the representatives of the LAG Byala Slatina team is related to the practical loss of the bottom up planning effect. According to them, the needs of stakeholders in the LAG's territory do not fully meet the eligible activities and costs that may be included in the strategies. Regulations defining

the types of eligible measures set certain frameworks. However wide these frameworks are, they do not allow planning based on real need. Measures to support agriculture, processing of agricultural products, etc. should be mandatory. One of the problems is that it is not possible to create job positions for start-ups or to create new ones. Such firms most often do not meet the eligibility criteria.

This problem is strongly related to the next one. As there are not enough active enterprises in the LAG territory, the farmers are few and the business environment in the municipality is not at a good level. There is no interest in implementing the projects financed by the strategy among the potential beneficiaries.

There are difficulties in communicating with Managing Authorities, which are different for different operational programs providing funding.

Several adjustments have been made to strategies to meet formal criteria. In addition, the LAG representatives believe that the implementation of the approach needs to be under the authority of one managing authority, regardless of the number of funding operational programs. Communication with more than one managing authority slows down and slows down the implementation of the strategy, as often different managing authorities have different requirements and criteria.

With regard to measures aiming at social inclusion, the LAGs face a problem related to the simultaneous implementation of a national program and a measure embedded in the strategy in the same territory. As it is necessary to avoid duplication of target groups and in small municipalities the target group is not large, the LAG decided not to include activities from the Human Resources Development Operational Program in its strategy. The other reason for not including OP HRD activities is the lack of an active citizen sector in the municipality. There are practically no NGOs that can demonstrate financial capacity, community centers are not active, and NGOs outside the LAG's territory are not allowed to participate in the implementation of the strategies. This practically excludes the possibility of implementing measures for social inclusion and targeting of the Roma. This, of course, does not mean that Roma cannot participate in the other measures, but in practice this does not happen because they do not meet the formal criteria or do not have sufficient information about the existing opportunities.

According to the local Roma community the LAG strategy is not seen as a potential for Roma community's development. Roma have participated in the development of the local strategy, however not very actively. They did not present any proposals. Their participation has been limited to physical presence at the public meetings. They state that the reason for the insufficient involvement is the lack of knowledge regarding the necessity of the strategy, the lack of confidence and to some extend – the lack of openness of the LAG itself. At the present moment the local community stands passive. No applications before LAG are prepared. The local Roma state that the reason for the latter is the high level of immigration and the lack of active persons within the community.

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LAG Hisarya

LAG Hisarya works on the territory of Hisarya municipality, which is located in the central part of the South Bulgaria. The population of the municipality is around 13 000, and about 500 of them self-identify themselves as Roma. Characteristic of Hissarya is strong tourism development due to the presence of healing mineral springs, developed agriculture - mainly in the field of green production and developed industry in the region around Hissarya Municipality.

LAG Hisarya implements a strategy for the first time during the current programming period. The strategy includes measures from the Rural Development Program, the Innovation and Competitiveness Program, the Environment Operational Program, the Human Resources Development Operational Program and the Science and Education for Intelligent Growth Operational Program. To date, parts of the measures of almost all operational programs have been launched.

Despite the general view of the smooth and effective implementation of the strategies, there are problems with the implementation of the measures. LAG representatives state that measures funded by the Human Resources Development Operational Program are very slow. Communication and synchronization with the Managing Authority of the Operational Program is proceeding very slowly. Approval of the application guidelines takes a long time (between 3 and 6 months), which slows down the start of the measures and threatens their implementation due to the requirements for deadlines for implementation. The LAG representatives shared the need for the Managing Authority of OP HRD to optimize its activities and shorten the deadlines for approving the application guidelines.

Overall, LAG representatives expressed satisfaction with the involvement of local businesses in the measures funded by the Rural Development Program and Innovation and Competitiveness Program, but shared that the lack of advance payments for Rural Development projects hinders some of the potential applicants. Another major problem that they find difficult is work with the EUMIS 2020 system. During this period, all European funding projects are submitted and managed in an electronic platform. Often companies and farmers do not have the necessary skills to work with the system. It is necessary to use consulting help from companies, which additionally burdens the beneficiaries financially and, on the other hand, makes them highly dependent on the consulting firms.

Another significant problem they face is the difficulty in dealing with the municipalities, which are necessarily part of the LAG. Municipalities see the LAG solely as a source of funding for infrastructure projects, not as a potential for overall territorial development. Often conflicts arise because of the municipality's demand for more infrastructures.

Regarding vulnerable groups, part of the measures in the OP HRD and the OP SEIG are targeting the Roma, but the LAG has not taken any specific action to include them in the planning. For the most part, the views of NGOs and schools on existing problems and ways of solving them have been taken into account. In general, there is no separate Roma community within the municipality, Roma are not aware of the existence of a strategy. Their participation is reduced to their children

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participating in activities funded by the OP SEIG or by engaging in employment through measures under the OP HRD, making them only passive users of services.

LAG Kotel -Sungurlare - Varbitsa

LAG Kotel – Sungurlare – Varbitsa is a LAG working on the territory of three municipalities located in two different regions – in South-East and in North-East Bulgaria. Територията на МИГ е една от най – големите в България. The territory of the LAG is one of the largest in Bulgaria. The area is underdeveloped, with almost no industry, agriculture is heavily represented, and most of it is in a mountainous area. There are 4 different ethnic groups living in the territory of the LAG, with the Roma community accounting for a significant proportion.

The strategy includes measures from three Operational Programs - Rural Development Program, OP HRD and Innovation and Competitiveness Operational Program.

To date, parts of the measures under the Rural Development Program and Innovation and Competitiveness Program have been launched. Like the others, LAG Kotel-Sungurlare-Varbitsa applied the CLLD approach for the first time during the current programming period.

In terms of strategy implementation, LAG representatives said that there was a major problem with multi-fund strategies. The reason for this is the lack of good coordination between the managing authorities, which results in delays in the approval of the application guidelines. Particularly serious is the problem with the Managing Authority of the Human Resources Development Operational Program.

LAG representatives have placed a serious emphasis on the breach of bottom-up planning principles. In practice, the strategies of the CLLD approach reproduce the measures of the national programs and apply them in parallel within their territories. The effect of the local community not planning measures to meet local needs or develop the territory in the direction they desire is not achieved.

There is also a lack of sufficient capacity among local stakeholders on the territory of this LAG. Especially for local NGOs, none of them can demonstrate the financial capacity to be an eligible candidate under any of the social inclusion measures. Although the grants under the strategies are lower requirements for the beneficiaries and the number of documents required is the same as for the national programs.

Again, working with the EUMIS 2020 system is an obstacle for most stakeholders. The focus was again on the activities of the consulting firms, which the beneficiaries had to pay if they wanted to have a successful project funded by the LAG strategy.

These specific difficulties, which affect the activity of the potential beneficiaries, adding to the problems related to the lack of advance payments and long delays in final payments, according to

the LAG representatives minimize the number of potential applicants for project implementation and the potential number decreases with each announced measure.

Regarding the Roma community, LAG representatives said they maintained active contacts with local activists, which was confirmed by the community itself. Roma have been involved in the planning of the strategy and are expected to participate in the implementation of both the general and social inclusion measures. The problem is that there are no Roma NGOs working in the LAG's territory, which means that they will be dependent on the implementation of measures by other NGOs. However, their participation in general measures is a good indicator of Roma inclusion.

LAG Isperih

Isperih Local Action Group covers the territory of Isperih Municipality. Isperih Municipality is located in Northeastern Bulgaria. The population of the municipality is about 25 000, Roma are about 3000. The industry is underdeveloped, the region is agricultural. As in Byala Slatina, emigration is very high, especially among the Roma community. The LAG Isperih is implementing a strategy for the second time with the CLLD approach. In the past programming period, it was one of 35 LAGs with funded strategies. The LAG Isperih Strategy is a multi-fund strategy, incorporating measures from the Rural Development Program, Human Resources Development Operational Program and Innovation and Competitiveness Operational Program.

To date, the LAG Isperih have announced 2 measures from the Rural Development Program and one from the Human Resources Development Operational Program.

One of the most significant problems that the LAG Isperih encountered is the great delay in the validation of the guidelines for application of the measures funded by the OP HRD. The delay is within 6 months. During this 6-month period, the guidelines were revised several times and practically lost their specificity as measures planned to meet local needs.

An example is the measure aimed at integrating vulnerable groups. When planning with representatives of the community, measures were planned to meet non-specific needs, which subsequently did not fall within the guidelines for application due to the inadmissibility of this type of activity. This in practice reaffirms the observation of the other LAGs included in the study that the bottom-up planning approach is meaningless.

The situation is even more complicated as projects under the programs of the Isperih Municipality are already being implemented under the national programs and careful selection of target groups is necessary in order to avoid double funding.

Again, due to the existence of rules that cannot be changed according to the local need, it is impossible to spend 100% of the funds earmarked for social inclusion within the HRDOP, since one applicant can only be a lead project partner once, and local level lacks the capacity (financial and human) to implement a project funded by the LAG strategy.

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There are no difficulties with regard to Roma participation in the planning and participation of Roma in the implementation of the LAG strategy. The strategy is planned with the active involvement of the local Roma community center, which will also be the implementer of one of the integration projects, but there are difficulties with the participation of Roma in mainstream measures to encourage local farmers and businesses. Due to insufficient capacity, many Roma business people are refusing to develop projects on general measures, unlike other businesses in the LAG, which is very active.

Conclusions and recommendation

The studies show that despite the difficulties, all funded LAG implement their strategies, even if there are some delays. From the information collected, we can conclude that existing problems can be divided into several categories.

The first category can be defined as administrative and technical obstacles. It is evident that the implementation of the approach results in delays, both in terms of strategy implementation and in terms of financial transfers. The reasons for this delay on the one hand are the insufficient administrative and human resources in both LAG's and the managing authorities, on the other hand are frequent changes in rules and regulations governing the application of the approach. Changes to already approved strategies and the annexation of them are often required. To this group we can also include the delay in financing, both for the management of the strategy and under contracts with beneficiaries. Delay in final payments often leads to discouragement for potential beneficiaries and refusal to execute projects.

To overcome existing obstacles must be put in place rules and regulations to be changed only in extremely urgent cases. Furthermore, it is necessary to optimize the verification and payment system with the beneficiaries. The deadlines currently applicable are too long.

With regard to the beneficiaries, it is necessary to introduce a simplified application procedure which does not copy the requirements for project proposals from the national program. Criteria and requirements need to be applied according to the amount of the grant concerned With regard to communication between the Managing Authorities and the LAG's, it is necessary to introduce a time limit for the approval of the guidelines for the application and approval of forms and supporting documents. At the moment, these procedures take too long.

In the next programming period, it is necessary to introduce a single managing authority for the implementation of the CLLD approach. At present, the number of managing authorities corresponds to the number of operational programs providing funding for Local Development Strategies. This puts an additional burden on the LAG teams to meet the different criteria and requirements imposed by the different managing authorities.

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The second category of difficulties encountered can be identified as difficulties in the application of the principles of CLLD. From the interviews it became clear that in practice despite bottom-up planning, in - mostly in the Strategy measures copied to national programs and part of the identified needs of the territory cannot be secured by measures in local development strategies. This is largely violates the principles of CLLD. In the next programming period, it is necessary to give full freedom to plan measures in the strategies as well as full freedom to set measures in the strategies.

In addition, it is necessary to invest more in the capacity of local stakeholders. It is obvious that in small municipalities civil sector does not have sufficient skills to implement projects and municipalities often adopt strategies solely as a source of funds for infrastructure. Measures need to be taken to strengthen the role of business and citizens at the expense of local authorities.

The third category of difficulty is related to the participation of representatives of vulnerable groups in the process of planning and implementing the Local Development Strategies. Very often, vulnerable groups remain passive in planning strategies and even more passive in implementing them, resulting in a lack of impact to achieve social inclusion In the next programming period, it is necessary to invest timely in permanent animation and capacity building activities among vulnerable communities at all stages of the planning of the strategy until implementation and evaluation. It is necessary to remove the requirement for soft measures projects to be implemented only by NGOs registered in the territory of the LAG, because in small municipalities they are lacking.

Despite the difficulties CLLD remains one of the approaches that should be widely used in the next programming period. As much as implementation difficulties are observed, this remains the only approach that gives the chance for the development of small municipalities in rural areas. Proposals for optimizing the program over the next programming period will allow for a better impact on both the territory and the vulnerable groups.

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