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Ministry of Development & Competitiveness

PROJECT:

“Consultant for:

i) the Ex-ante Evaluation of the Cross Border Cooperation Operational Programme, Greece – Bulgaria 2014-2020

ii) the Strategic Environmental Assessment

of the Cross Border Cooperation Operational Programme, Greece – Bulgaria 2014-2020”

3rd DELIVERABLE of the Ex-ante Evaluation of the Cross Border Cooperation Operational Programme, Greece – Bulgaria 2014-2020



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Contents

NON-TECHNICAL SUMMARY	5
MAIN IMPROVEMENTS OF THE OP BETWEEN VERSIONS THAT TAKE INTO ACCOUNT THE EX-ANTE EVALUATION’S RECOMMENDATIONS	8
1. EVALUATION OF THE PROGRAMME’S STRATEGY	9
1.1. Introduction and evaluation of the valuation of the current situation in the CBC area	9
1.1.1 Evaluation of the process followed to identify priorities	9
1.1.2 Evaluation of the Programme’s goals and contribution to E2020 Strategy	10
1.1.3 Evaluation of the section “Lessons learnt and capitalization of prior programme experience”	11
1.1.4 Evaluation of the justification for the financial allocation	12
1.2 Evaluation of the Strategy’s Cohesion	12
1.2.1 Strategy Cohesion: Priority Axis 1 / Thematic Objective 3	12
1.2.2 Strategy Cohesion: Priority Axis 2 / Thematic Objective 5	14
1.2.3 Strategy Cohesion: Priority Axis 2 / Thematic Objective 6	14
1.2.4 Strategy Cohesion: Priority Axis 3 / Thematic Objective 7	15
1.2.5 Strategy Cohesion: Priority Axis 4 / Thematic Objective 9	17
1.3 Evaluation of the Internal Coherence	19
1.4 Evaluation of the External Coherence and synergies with other OPs	23
1.4.1 Position Paper Greece	23
1.4.2 Position Paper Bulgaria	24
1.4.3 Partnership Agreement Greece	24
1.5 Evaluation of the Intervention Logic	26
1.5.1 Priority Axis 1 / Thematic Objective 3	26
1.5.2 Priority Axis 2 / Thematic Objective 5	28
1.5.3 Priority Axis 2 / Thematic Objective 6	28
1.5.4 Priority Axis 3 / Thematic Objective 7	30
1.5.5 Priority Axis 4 / Thematic Objective 9	31
2. EVALUATION OF THE INDICATORS’ FRAMEWORK	33

2.1 Introduction	33
2.2 Suitability and Relevance of the OP’s Indicators	46
2.2.1 Output Indicators.....	46
2.2.2 Results Indicators.....	47
2.3 Baseline – Target Values	48
2.4 Evaluation of Milestones in the Performance Framework	48
3. EVALUATION OF THE FINANCING PLAN	50
4. EVALUATION OF THE CONTRIBUTION TO EUROPE 2020 AND COMMON STRATEGIC FRAMEWORK	52
4.1 Introduction	52
4.2 Contribution to Europe 2020.....	52
4.3 Contribution to Common Strategic Framework.....	53
5. EVALUATION OF THE ADMINISTRATIVE CAPACITY, ADEQUACY OF HUMAN RESOURCES AND THE SUITABILITY OF PROCEDURES TO MONITOR, MANAGE AND EVALUATE THE OP	57
6. EVALUATION OF MEASURES TAKEN FOR THE PROMOTION OF EQUAL OPPORTUNITIES BETWEEN MEN AND WOMEN AND THE PREVENTION OF DISCRIMINATION.....	58
6.1 Equality between men and women	58
6.2 Equal opportunities and non-discrimination	58
7. EVALUATION OF MEASURES TAKEN FOR THE PROMOTION OF SUSTAINABLE DEVELOPMENT.....	58

List of Abbreviations

MA: Managing Authority

JMC: Joint Monitoring Committee

JS: Joint Secretariat

JSC: Joint Steering Committee

PDT: Programme Design Team

OP: Operational Programme

ROP: Regional Operational Programme

EU: European Union

EC: European Commission

EU27: The 27 Member States of the European Union

ERDF: European Regional Development Fund

GR-BG: Greece – Bulgaria

FYROM: Former Yugoslav Republic of Macedonia

NUTS: Nomenclature of Territorial Units for Statistics

CB: Cross Border

CBC: Cross Border Cooperation

ETC: European Territorial Cooperation

E2020: Main Strategy Document “Europe 2020”

CSF: Main Strategy Document “Common Strategic Framework”

PP: Position Papers

P.A.: Partnership Agreement

SMART: Specific, Measurable, Achievable, Relevant, Timely Bound

IP: Investment Priority

TO: Thematic Objective

PA: Priority Axis

SO: Specific Objective

TA: Type of Actions

ER: Expected Results

GDP: Gross Domestic Product

GVA: Gross Value Added

ICT: Information and Communications Technology

R&D: Research and Development

KM: Kentriki Makedonia (greek name for Region of Central Macedonia)

AMTH: Anatoliki Makedonia Thraki (greek name for Region of Eastern Macedonia Thrace)

YMPERAA: Greek Operational Programme for the Transport and Environment sectors

EPANEK: Greek Operational Programme for Competitiveness, Entrepreneurship and
Innovation

PO: Programme Output Indicator

CO: Common Output Indicator

PR: Programme Result Indicator

Non-technical summary

Programme strategy

The Operational Programme’s (OP hereafter) strategy section begins with a brief and concise overview of the characteristics (area, population, borders etc.) of the CBC area. The use of multi-criteria analysis in combination with the consideration of major programming/policy/strategy documents in the analysis is considered as very successful and it contributes significantly towards a sound target setting and strategy formulation for the OP. This process is considered to be sound and successful and results in the formulation of the OP’s 4 Priority Axes (PA hereafter).

The OP reviews the CBC area in detail by covering several key sectors including lessons learnt and capitalization of prior programme experience without making very clear the needs that are emerging. It is considered that further elaboration should be made on the transition from the identified “problems-issues” to the identified “needs” of the area in order to enhance and solidify the OP’s target setting procedure.

The OP successfully links its goals to the main E2020 headline objectives which are “smart growth”, “sustainable growth” and “inclusive growth”. Each headline goal is linked with specific goals of the OP such as “promoting innovation at all levels” (OP) and “smart growth” (E2020).

In relation to the justification for the financial allocation, it is considered in general terms adequate. In particular, it prioritizes thematic objectives without making any justifications for the prioritization based on the previous analysis.

Concerning the OP’s strategy cohesion, the proposed SOs (Specific Objectives) and IPs (Investment Priorities) are estimated to have sufficient coherence and serve the corresponding thematic objectives and the expected results for the relevant PAs. Regarding the consistency in relation to the key reference texts it is estimated that all SOs and the related indicative actions are expected to have positive contribution to the objectives and priorities set by the texts in their entirety.

The internal coherence of the Programme’s specific objectives is considered to be positive and significant on average. In particular it is worth mentioning that there has not been observed any case where a negative relationship between specific objectives was estimated which indicates that the Programme’s target setting and strategy is sound and provides objectives with synergies, complementarities and no conflicts at all. Additionally, the OP’s specific objectives are exhibiting a significant cohesion in relation with the main reference documents and their objective/goals/aims/priorities. The OP’s strategy and set objectives display a strong and positive relation to the main reference documents which results in evaluating very positively the Programme’s external coherence.

Finally, concerning the intervention logic, the evaluation considers that the accomplishment of the chosen Specific Objectives is possible through certain results which in turn help achieving the results that the member states seek to attain by using the Union support. The

transitions are testable by examining the changes in the results and outputs that are mentioned using quantitative data.

Indicator framework

The indicators’ framework of the OP is found to be complete and functional. In particular, all investment priorities are covered by relevant output indicators that correspond adequately and successfully to the proposed types of actions. Furthermore, each and every specific objective is covered with at least one results’ indicator. The majority of the indicators have been successfully constructed and defined. The evaluation found that there is room for improvement in the results indicators for the 1st and the 3rd priority axis. In particular, the indicators themselves are not optimal with respect to their representativeness. Overall the target and baseline values do seem realistic and achievable and on average they are followed by a sound methodological approach for their calculation. Similarly, the performance framework is successfully constructed with the exception of not subtracting the 6% value of the allocations for the calculation of the financial milestones.

Financing plan

The financial allocation is in accordance to the OP’s strategy and corresponds to the nature of the proposed actions and associated costs under each thematic objective. The main issue that requires attention and amendment in the financial allocation is the fact that there is no reference or use of the 6% performance reserve allocation.

Contribution to Europe2020 and Common Strategic Framework

In general it is evaluated that the majority of the OP’s specific objectives through their achievement will contribute significantly towards all the objectives and initiatives of both E2020 and CSF. It is estimated that the Programme’s strategy and set specific objectives contribute significantly towards both E2020 and the CSF and this results in a high degree of compatibility and coherence between this OP and E2020 and CSF.

Administrative capacity, adequacy of human resources and the suitability of procedures to monitor, manage and evaluate the op

The OP provides a detailed account concerning the management and control arrangements that will be implemented for the implementation and monitoring of the OP. The procedures that are presented in detail and that concern aspects for monitoring, implementing and controlling the OP appear to be well designed. The OP adequately outlines the procedures that will be followed in order to have the necessary data for monitoring and evaluation with references to annual reviews, on-going and ex-post evaluations. Finally the OP presents successfully the steps that it will take in order to reduce the administrative burden that could put obstacles to the OP’s implementation. To conclude, it is considered that the OP will have an adequate system for monitoring, implementing and evaluating the implementation of the programme through the procedures and structures that are described in the programming document.

Measures taken for the promotion of equal opportunities between men and women and the prevention of discrimination and the promotion of sustainable development

In the OP GR-BG there is reference to equality between men and woman aspects. It is quite clear, that the OP pays specific attention to equal opportunities and non-discrimination. The OP takes into account the horizontal principle of sustainable development in the development of the Programme’s strategy as well as in the process of goal setting and the development of the specific objectives and the respective actions. Generally, the OP seems to be adequate regarding the promotion of equal opportunities, equality between men and women, the prevention of discrimination and the promotion of sustainable development.

Main improvements of the OP between versions that take into account the ex-ante evaluation’s recommendations

The OP’s latest version now includes a new section titled “lessons learnt and capitalization of prior programme experience”. Overall, this subsection does improve the documentation and analysis of the current situation in the CBC area in conjunction to the 2007-2013 Programme and associated conclusions. Having said that, the analysis provided in this subsection does not succeed in identifying the specific needs and objectives of the CBC area.

There has been significant improvement of the subsection 1.2 which provides justification for the financial allocation. In particular in the previous version of the OP there was no reference to thematic objectives (TO) and this has been properly addressed and the references have been formalized. It is recommended that this particular subsection should elaborate more on why each TO that constitutes the OP’s PA’s should be funded by a specific % of the OP’s budget. Furthermore, the thematic objectives should be mentioned formally and the funding allocations could be referred to with more accuracy (i.e. avoid mentioning “almost 22%” since an accurate percentage is available elsewhere in the OP and instead use an accurate percentage).

The OP’s strategy and in particular the definition of specific objectives has been improved and some inconsistencies that the ex-ante evaluation has noted in the previous version have now been properly addressed.

A small number of result indicators (such as the result indicator for IP 5d) have been improved with respect to their definition based on recommendations of the ex-ante evaluation. A number of output indicators have improved from the previous version of the OP, notably for investment priority 6d where now the indicator is successfully linked to proposed actions.

The indicators’ framework is now complete with respect to indicators and to baseline-target values. The previous version of the OP did not contain complete target-baseline values and the performance framework was absent. A number of target values have been improved with respect to their feasibility and realism, based on recommendations of the ex-ante evaluation. The performance framework is now present and functional with some exceptions that are noted in the main ex-ante evaluation document.

1. Evaluation of the Programme’s Strategy

1.1. Introduction and evaluation of the valuation of the current situation in the CBC area

The Operational Programme’s (OP hereafter) strategy section begins with a brief and concise overview of the characteristics (area, population, borders etc.) of the CBC area. Furthermore the area is neighboring to FYROM and Turkey (both aspiring to access the EU). It also addresses the spatial characteristics of the area by presenting numbers of cities small/medium/large and the population percentages that reside in them. Finally the overview refers to the history of this particular cross border cooperation which dates back to 1989. It should be noted that the quantitative data presented in this section should be accompanied by a mention of their source. Furthermore, the OP refers to 4 NUTS2 regions and 11 NUTS3 districts. The evaluation considers that the Programme’s Design Team (PDT hereafter) could mention which are these 4 NUTS2 and 11 NUTS3 regions and districts.

1.1.1 Evaluation of the process followed to identify priorities

The OP designers have followed a multi-criteria analysis in combination with the consideration of major programming/policy/strategy documents such as the Position Papers, the Partnership Agreements, etc. The multi-criteria analysis used 6 criteria that are:

1. Cross border character
2. Continuity
3. Complementarity
4. Relevance
5. Demand
6. Institutional Capacity

The use of the above criteria in the analysis is considered as very successful and it contributes significantly towards a sound target setting and strategy formulation for the OP.

The quality of the OP’s strategy formulation and target setting is further enhanced through the combination of the aforementioned multi-criteria analysis with:

- The recommendations of on-going evaluation of the current programme,
- The recommendations that stem from the Position Papers (PP hereafter) and the Partnership Agreements (P.A. hereafter)
- The various consultation procedures that are mentioned in detail in the OP’s text.

The process mentioned above is considered to be sound and successful and results in the formulation of the OP’s 4 priority axes (PA hereafter). The combination of the thematic objectives 5 and 6 into a single PA is adequately and successfully justified by the OP with the

“production of an integrated approach to environmental protection and adaptation to climate change” as the main justification.

1.1.2 Evaluation of the Programme’s goals and contribution to E2020 Strategy

In this section, the OP successfully links its goals to the main E2020 headline objectives which are “smart growth”, “sustainable growth” and “inclusive growth”. Each headline goal is linked with specific goals of the OP such as “promoting innovation at all levels” (OP) and “smart growth” (E2020).

Following these linkages, the OP reviews the CBC area in detail by covering several key sectors. Initially in reviews the general level of development of the area and identifies that the area is one of the poorest in the EU by judging its performance on the GDP per capita which is below 50% of the EU27 average. Although quantitative data are used throughout this part of the text, there is no particular reference concerning their source and this should be addressed by the PDT. The key sectors that the review then covers are the “economy”, “innovation”, “climate change”, “environment”, “accessibility”, “labor market”, and “poverty and social inclusion”.

The review identifies problems and issues in every sector covered by highlighting these in bold lettering as follows:

Economy

- The economy remains considerably more agricultural, less industrial, and more service-dependant
- More than half of GVA produced in the CB area (59%) is produced in the district of Thessaloniki
- Total labor productivity in the CB area is significantly lower than the EU27 avg.

Innovation

- Bulgaria... modest innovator, Greece... moderate innovator
- Significant research facilities currently which are however not collaborating with each other or with the business community

Climate change

- The programme area is substantially more vulnerable to climate change both compared to EU 27 and the Greek and Bulgarian national levels

Environment

- The CB area is characterized by many and important natural resources that have not been sufficiently exploited for development purposes in the past.
- Both cross-border rivers - Nestos and Evros - are polluted
- Major problems in the management of urban wastewater result from the lack of sewage treatment infrastructure in settlements between 2,000-10,000 inhabitants

Accessibility

- Lower-level roads are at various stages of disrepair (especially on the Bulgarian part) making interconnections difficult and reducing mobility especially in the mountain ranges.
- Several Egnatia vertical axes are still missing or under construction and the motorways on the Bulgaria part are incomplete
- The area is deficient in terms of railway and multi-modal infrastructure.

Labor Market, Poverty and Social Inclusion

- Risk of large structural unemployment
- The CB area exhibits considerably higher than EU27 percentages of population at risk of poverty or social exclusion (3-4 times higher).
- The large number of people experiencing poverty and social exclusion in the CB area is also attributable to the presence of various vulnerable groups such as minorities
- The rising incidence of poverty has many social consequences, one of which is the deteriorating public health conditions.

Although the above review is very well presented and gives a very concise and complete picture of the CBC area's issues in the aforementioned sectors, it is not clear which CBC needs emerge from these problems. The evaluation considers that the PDT should elaborate more on the transition from the identified “problems-issues” to the identified “needs” of the area. The needs of each sector must be identified at first, then, these needs should be linked with the OP's PA's in order for the next logical step to take place which is the coverage of the identified needs by the OP's target setting and strategy. It is worth mentioning that on “table 1” of the OP there is adequate justification of the selection of the investment priorities that contain a lot of information that is related to the needs of each TO. This information could be utilized in order to produce the identified needs of the OP.

1.1.3 Evaluation of the section “Lessons learnt and capitalization of prior programme experience”

This section of the OP presents some of the aspects and findings of the ongoing evaluation of the 2007-2013 CBC OP. One of the key conclusions is that due orientation and limited financial resources –the CB area major problems cannot be addressed fully by the CBC OP and that the CBC OP can only complement the actions of the main national Programmes. The major challenges of a CB nature that the CBC OP should focus on according to this subsection of the OP are the following:

- more movement of people and goods (i.e. open borders and increased accessibility);
- integration of the cross-border area in terms of social services, educational levels, living conditions, streamlining administrative procedures and systems, etc.;
- joint defense mechanisms against exogenous threats to the area; and
- the environmental and climate-change issues.

Furthermore the subsection states that according to the on-going evaluation recommendations, the new Programme needs to focus on fast “return-on-investment” policies. Following this the subsection refers to the most important conclusions of the

current (2007-2013) programme in three thematic areas: Entrepreneurship, competition and innovation; Social conditions and unemployment and Environment.

Overall, this subsection does improve the documentation and analysis of the current situation in the CBC area in conjunction to the 2007-2013 Programme and associated conclusions. Having said that, the analysis provided in this subsection does not succeed in identifying the specific needs and objectives of the CBC area. This issue that has been identified previously should be addressed in order to enhance and solidify the OP’s target setting procedure.

1.1.4 Evaluation of the justification for the financial allocation

The justification supplied by the subsection 1.2 of the OP has been improved by taking into account among other things the recommendations of the ex-ante evaluation. In the justification part of the subsection, there is reference that a specific priority is first, second, third etc. It is not clear where did, that particular ranking, result from. It is recommended that this particular subsection should elaborate more on why each TO that constitutes the OP’s PA’s should be funded by a specific % of the OP’s budget. The thematic objectives should be mentioned formally and the funding allocations could be referred to with more accuracy (i.e. avoid mentioning “almost 22%” since an accurate percentage is available elsewhere in the OP and instead use an accurate percentage).

1.2 Evaluation of the Strategy’s Cohesion

The following subsection evaluates the OP’s strategy cohesion. In particular it examines if the selected Specific Objectives are coherent and serve the overlying Investment Priorities if the selection of the Investment Priorities is optimal. Finally the subsection examines if identified needs are covered by achieving the specific objectives.

1.2.1 Strategy Cohesion: Priority Axis 1 / Thematic Objective 3

The **1st** priority axis “*A Competitive and Innovative Cross-Border Area*” which is aligned with the **3rd** Thematic Objective will be served by the investment priorities **3a** “*Promoting entrepreneurship, in particular by facilitating the economic exploitation of new ideas and fostering the creation of new firms, including through business incubators*” and **3d** “*Supporting the capacity of SMEs to grow in regional, national and international markets, and to engage in innovation processes*”.

Under **IP 3a** “*Promoting entrepreneurship, in particular by facilitating the economic exploitation of new ideas and fostering the creation of new firms, including through business incubators*”, the Specific Objective **SO.1.3a.1**¹ that has been set has the title “To improve support systems tailored for start-ups and existing SMEs, focused on cross-border cooperation.”

The selection of the proposed interventions, for achieving SO.1.3a.1 (improvement of business hosting facilities, development of business support services, development of services fostering productivity), has been successful. Having said that, it is noteworthy that,

¹ The coding of the specific objectives utilized in this ex-ante evaluation document is as follows: SO.1.3a.1 is for the 1st PA, and the 3a IP, the 1st SO that has been set.

the element of “*cross border cooperation*” which is a key element of the SO, has a rather limited presence in the proposed actions-interventions for SO.1.3a.1. The proposed actions should be rephrased accordingly so that the cross border cooperation becomes a more apparent characteristic of them. Furthermore, it seems that the choice of investing in types of actions such as the modernization/improvement of business hosting facilities may prove too challenging for the scope of the CBC programme. In contrast, the choice of types of actions such as development of ICT systems, business-specific training Programmes etc, seems much more in line with the scope of the CBC programme. These remarks among other things, stem from the analysis of the ongoing evaluation of the 2007-2013 programme that was presented in the OP (starting at page 7) and specifically the following statement which highlights the scope and nature of the CBC Programmes which is as follows: “...the programme cannot solve the CB area major problems and can only be seen as complementary to mainstream Programmes.”

The selection and definition of the SO.1.3a.1 and of the proposed actions and the selection of the IP 3a (which is appropriate) will result in the achievement of both of the results that the member states seeks to achieve with Union support. Lacking an identification of specific needs, the evaluation cannot comment how and which needs under TO3 will be covered by achieving SO.1.3a.1.

Under **IP 3d** “*Supporting the capacity of SMEs to grow in regional, national and international markets, and to engage in innovation processes*”, the Specific Objective **SO.1.3d.1** that has been set has the title “*To expand economic activity in the cross-border area, by encouraging innovation and exchanges*” in the main text (page 16 of the OP) whereas in table 2 the specific objective has a different title “*Expand cross-border economic activity, innovation and exchanges*”. A previous version of the OP has used a title for this specific objective (in table 2 of the previous draft) which was the following “*Expand cross-border economic activity, innovation and exchanges through the support of SME growth*” The latter definition is much more appropriate for defining a specific objective that is suitable for the IP 3d. This is due to the fact that it refers more specifically to the fact that the desired expansion will be achieved through supporting SME’s which is a key element of the 3rd TO. The PDT must adopt the latter definition and must make sure that it is used universally throughout the OP document without any disparities.

The proposed actions that are selected for achieving SO.1.3d.1 (creation of clusters, collaboration schemes, joint R&D activities, joint export support services, cross border business plans, etc.) is in essence successful and serves its purpose for SO.1.3d.1 and IP 3d. The main issue with the proposed types of actions is the fact that they do not refer specifically to SME types of business. It is noted that one of the main target groups is local SMEs and it is recommended that this (the fact that the actions refer to SMEs ONLY) should be spread across the proposed actions. Similarly to the comment made for IP 3a (which concerned the choice of investing in types of actions such as the modernization/improvement of business hosting facilities), the creation of clusters may prove too challenging under the scope of a CBC OP. The PDT could consider focusing more on “softer” types of actions such as the ones already included in the OP (such as joint export

support services, branding of “green” and “traditional” products (and services) that promote the CBC area cultural heritage”.

The types of actions proposed, the SO.1.3d.1 defined and the selection of IP 3d is estimated that will be successful in achieving the desired results of the member states by using Union support. To conclude, the selection of the IPs 3a and 3d, the definition of the SOs 1.3a.1 and 1.3d.1 alongside the proposed actions results in a good cohesion for the OP’s strategy and is also coherent to the main strategy-policy reference documents such as the E2020, CSF, PPs, and P.A.

1.2.2 Strategy Cohesion: Priority Axis 2 / Thematic Objective 5

TO 5 is estimated to be achieved through investment priority **5b** (Promoting investment to address specific risks, ensuring disaster reliance and developing disaster management systems). In the context of IP 5b, Specific Objective **2.5b.1** “Reduce impacts from disasters” has been set with recommended actions concerning measurements for the risk prevention and management of natural disasters and the reduce of their impacts in the wider CB area.

Considering that SO 2.5b.1 is part of the PA 2 which addresses environmental issues in the CB area, it is evaluated that the definition of this SO is not adequate and should be more specific, referring to *natural* disasters, as “disasters” may refer to natural, man-made or mixed ones, such as epidemics, road accidents, forest fires and social conflicts as well. It should also be highlighted the CB aspect. Moreover, the types of actions described in the text, consist of both prevention-information actions and post-disaster actions i.e. management actions. The definition of the SO does not seem to totally correspond to this context. Thus, it is suggested the SO to be changed to “Prevent *natural* disasters and reduce their impacts *within the CB area*”.

The types of actions expected to contribute to the SO 2.5b.1 as described in the text, generally have been correctly selected, as they cover a set of different actions to meet the needs of the CB area for prevention and the limitation of damages caused by natural disasters. However it is suggested the CB aspect to be more obvious. As for the strategies, action plans and other management actions that are suggested, it is very important these to be *common actions*.

In summary, the proposed SO and IP are estimated to have sufficient coherence and serve the 5th thematic objective and the expected results for the 2nd PA. Regarding the consistency in relation to the key reference texts it is estimated that SO 2.5b.1 within the IP 5b and the related indicative actions are expected to have positive contribution to the objectives and priorities set by the texts in their entirety.

1.2.3 Strategy Cohesion: Priority Axis 2 / Thematic Objective 6

TO6 is expected to be achieved through IPs **6c** (Conserving, protecting, promoting and developing natural and cultural heritage), **6d** (Protecting and restoring biodiversity, soil protection and restoration and promoting ecosystem services including NATURA 2000 and green infrastructures) and **6f** (Promoting innovative technologies to improve environmental protection and resource efficiency in the waste sector, water sector, soil protection or to reduce air pollution).

The SO set for the IP 6c is the **2.6c.1** “Valorize CB area cultural and natural heritage”, suggesting actions for the preservation and valorization of the cultural and natural heritage of the CB area. As for the definition of the SO, it would be more accurate if it included the *conservation* aspect as well: “Conserve and valorize CB area cultural and natural heritage”. As for the types of actions, they are very clearly described and fully correspond to the SO and it is estimated that they meet the needs of the CB area to address common challenges, to capitalize on opportunities and produce a CB added value.

The IP 6d is covered by the SO **2.6d.1** “Enhance the effectiveness of biodiversity protection activities”. The SO 6d.5 involves actions towards the direction of the development of joint strategies and measures for the protection and management of CB area’s biodiversity., This SO is in line with the results the two countries seek to achieve with Union support; they do not only seek methods to enhance the protection of the ecosystems but mainly methods to enhance and support a biodiversity protection system involving infrastructure works, use of technological means for monitoring and management etc. However, except from the development of joint strategies & procedures, it would be very important joint synergies between environmental management authorities to be developed as well. Generally, the indicative actions seem to correspond to and meet the expected results of the respective SO.

The IP 6f is covered by the SO **2.6f.1** “Enhance water and soil management”. Specifically, the types of actions described refer clearly to water and soil management and they adequately correspond to the SO 6f and the expected results with Union support in the CB area.

In summary, the proposed SOs and IPs are estimated to have sufficient coherence and serve the 6th thematic objective and the expected results for the 2nd PA. Regarding the consistency in relation to the key reference texts it is estimated that all SOs and the related indicative actions are expected to have positive contribution to the objectives and priorities set by the texts in their entirety.

1.2.4 Strategy Cohesion: Priority Axis 3 / Thematic Objective 7

The (TO)Thematic Objective 7 is included in the Priority Axis 3: A better interconnected Cross-Border area. The selected Investment Priorities in the context of TO 7 are:

- Enhancing regional mobility by connecting secondary and tertiary nodes to TEN-T infrastructure, including multimodal nodes (7b of ERDF) and
- Developing and improving environmentally-friendly (including low-noise) and low-carbon transport systems, including inland waterways and maritime transport, ports, multimodal links and airport infrastructure, in order to promote sustainable regional and local mobility (7c of ERDF).

The selection of the IP 7b is well analyzed under section 1 and the corresponding table 1, whereas the selection of the IP 7c contains justification in the table 1 without being thoroughly documented in the section 1.

In line with the selected IPs, Specific Objectives of the TO 7 refer to:

- Improve accessibility of the CB area (SO 3.7b.1) and
- Improve transportation environmental impact (SO 3.7c.1)

and are well correlated with the selected IPs.

The SO 3.7b.1 is associated with the following types of actions (TA):

- TA 7b.1 – “Construction of new or upgrading of existing infrastructure and construction works of CB importance especially through the completion of gaps in the TEN-T network and the existing secondary and tertiary network connected to it”,
- TA 7b.2 – “Construction of new or upgrading existing complementary infrastructures and connections” and
- TA 7b.3 – “Planning for logistics centers, multimodal nodes etc”.

The definition of the SO 3.7b.1 is describing well the desired policy outcome. The TAs have in general been properly selected and are expected to contribute significantly to achieving this specific objective. However, some comments can be made on the following issues:

1. TEN-T network is a subject that corresponds better in the IP 7a which is not selected in the programme, therefore the reference is proposed to be restated or better clarified
2. Further justification is needed in order to include “complementary infrastructures and connections” under the reasoning of the IP 7b
3. The TA 7b.3 – “Planning for logistics centers, multimodal nodes etc.” should be further specified since the use of this wording refers more to the corresponding facilities rather than enhancing their connectivity.

In the absence of a quotation for needs and challenges that will be faced, the evaluation of the strategy’s cohesion is taking into account the results that are expected (ER: Expected Results) to be achieved with the selection of these TAs. In these terms, the choice of this SO and TAs that will contribute to it, are evaluated in terms of the degree of coverage of the ERs, thus refer to the following:

- ER 7b.1 – “Reduced travel times for people and goods” and ER 7b.3 – “Improved traffic security” are well defined and are considered immediate expected results of all TAs (taking into account that TA 7b.3 has to do with the connection of the facilities and not the facilities themselves)
- ER 7b.2 – “Better connectivity for the less accessible areas” needs to be further addressed in the context of enriching the corresponding TAs.

The SO 3.7c.1 is associated with the following TAs:

- TA 7c.1 – “Transport investments aiming at reducing the environmental footprint of transport activities (including transport services)”,
- TA 7c.2 – “Development and introduction of transport monitoring systems (targeting passenger and/or goods mobility, infrastructure state-of-repairs, etc) and intelligent transport systems for goods and passengers” and

- TA 7c.3 – “Development of new technologies/methods for the design and implementation of environment-friendly transport infrastructures and systems”.

The definition of the SO 3.7c.1 is considered to describe better the desired policy outcome if the word “improve”, is replaced by the word “reduce”, since the word “impact” mainly involves negative results. The TAs have in general been properly selected and are expected to contribute significantly to achieving this specific objective.

In the context of evaluating the choice of the SO and TAs that will contribute to it in relation with the ERs, the following notes are being made:

- ER 7c.1 – “Reduced transportation environmental footprint” could be better formulated in order to avoid using the same words, for example, it could be stated as “Reduction of the environmental degradation deriving from the extensive use of transport means”
- ER 7c.2 – “Better integration with urban and rural development” would be improved and better fit in, by further identifying development as “sustainable”.

Regarding the consistency in relation to the key reference text “Europe 2020” noted that the choice of SOs and related TAs are expected to have a significant contribution to its objectives and priorities.

In summary, the proposed SOs and IPs selected are estimated to have sufficient coherence and serve the 7th TO and the majority of the ERs identified.

1.2.5 Strategy Cohesion: Priority Axis 4 / Thematic Objective 9

The Thematic Objective 9 is included in the Priority Axis 4: A socially inclusive Cross-Border area. The selected IP in the context of TO 9 is:

- Investing in health and social infrastructure which contribute to national, regional and local development, reducing inequalities in terms of health status, promoting social inclusion through improved access to social, cultural and recreational services and the transition from institutional to community-based services (9a of ERDF).

The selection of the IP is well justified in both section 1 and table 1 of the 1st draft of the programme.

The specified Specific Objectives of the TO 9 refer to:

- Improve access to high-quality health services in the CB area (SO 4.9a.1) and
- Increase the capacity of social enterprises in the CB area (SO 4.9a.2)

The SO 4.9a.1 is completely in line with the selected IP.

Regarding the second SO, it is noted that SO 4.9a.2 is presented to be included under IP 9a. This choice has to be reviewed for the fact that the SO 4.9a.2 correspond exactly to IP 9c – “Providing support for social enterprises”

The above issue should therefore be corrected incorporating the IP 9c into the programming document and making all necessary amendments in the rest of the template. If however the option of merging IP 9c with IP 9a is deliberate, it should be adequately justified and well adjusted.

The SO 4.9a.1 is associated with the following TAs:

- TA 9a.1 – “Support centers of reference (for health threats, rare diseases, organ donation) and develop joint cross-border plans and principles for the sharing of human and information resources”,
- TA 9a.2 – “Promote cooperation between healthcare authorities by implementing the shared use of resources and expertise in the cross-border healthcare provision wherever added value can be achieved”,
- TA 9a.3 – “Support to renovation and equipping of existing and new primary health care practices in CB areas with serious limitations in access to primary health care” and
- TA 9a.4 – “Development of cross-border mobile services, telemedicine and telecare infrastructure and other technology-oriented health care provision methods will be supported, in order to alleviate the local lack of healthcare workers”.

The definition of the SO 4.9a.1 is describing well the desired policy outcome. The TAs have in general been properly selected and are expected to contribute significantly to achieving this SO. However, some comments can be made on the TA 9a.4 which may be improved with some editorial changes: “mobile services” can be further identified as “mobile health services” and the last part of the TA “in order to...” can be omitted because it mainly corresponds to the expected result. It is therefore proposed the following wording: “Development of cross-border mobile health services, with support to telemedicine and telecare infrastructure”.

Furthermore, it is noted that the ERs:

- ER 9a.1 – “Increased *access for all* to basic health services”
- ER 9a.2 – “Increased access to healthcare for vulnerable groups and marginalized communities with high CB mobility”
- ER 9a.3 – “Implementation of ICT innovations and e-Health solutions to ensure efficient use of CB resources”

are well defined and are considered immediate ERs of all TAs.

The SO 4.9a.2 is associated with the following TAs:

- TA 9a.5 – “Support for the establishment and provision of operational support to Social Enterprises that offer innovative solutions, promote inclusive CB labor markets and social services accessible to all in the CB area”,
- TA 9a.6 – “Support for social franchising which is the cross-border transfer of a social enterprise business model from one side of the border to the other” and

- TA 9a.7 – “Support for the development and implementation of methodologies for monitoring and evaluation of social, economic and environmental impacts of social economy in the CB area”.

The definition of the SO 4.9a.2 is totally irrelevant with the desired policy outcome (a correction has been proposed earlier in this document in order to incorporate SO 4.9a.1 into IP 9c). The TAs have in general been properly selected and are expected to contribute significantly to achieving this SO.

The ERs:

- ER 9a.4 – “Broadened social services provided by social enterprises in local communities, especially in terms of better employability and employment of the vulnerable groups in the CB area”
- ER 9a.5 – “Improved visibility and recognition of social entrepreneurship, facilitating mutual learning and capacity building”

are well defined and are considered immediate ERs of all TAs.

Regarding the consistency in relation to the key reference text “Europe 2020” noted that the choice of SOs and related TAs are expected to have a significant contribution to its objectives and priorities.

In summary, the proposed SOs and IPs selected are estimated to need further corrections in order to have sufficient coherence. The selection of SOs and TAs serve the 9th TO and the majority of the ERs identified.

1.3 Evaluation of the Internal Coherence

The evaluation of the OP’s internal coherence examines the logical relationships between the Programme’s specific objectives. The main objective of this examination is to classify the OP’s specific objectives into four categories which are the following:

1. Strategic Objectives
2. Critical Objectives
3. Neutral Objectives
4. Sensitive Objectives

This classification will help managing authorities and stakeholders in understanding which specific objectives are more “crucial” in a sense for the general success of the OP. The following table presents the internal coherence matrix for the specific objectives of the OP. Reading the matrix rows provides the influence that the row-leading SO has on the column SOs. The horizontal sums provide the total influence factor for each SO while the vertical sums provide the total sensitivity factor that each SO exhibits. The average for both factors is 5.7.

If an SO is having a higher than 5.7 influence and sensitivity factor then it is classified as a strategic objective.

An SO that has a higher than 5.7 influence and a lower than 5.7 sensitivity factors, then it is classified as a critical objective.

If a specific objective has both sensitivity and influence factors with a value that is lower than 5.7, it is then classified as a neutral objective

A specific objective that has a higher than 5.7 sensitivity factor and a lower than 5.7 influence factor, is classified as a sensitive objective.

The values for measuring the influence-sensitivity between the specific objectives are as follows:

-1 Negative effect

0 Neutral effect

1 Positive but weak effect

2 Positive and significant effect

3 Very positive and strong effect

Table 1: Internal Coherence Matrix

Specific Objectives		PA 1 / TO 3		PA 2 / TO 5 and TO 6				PA 3 / TO 7		PA 4 / TO 9		Horizontal sums
		SO 1.3a.1	SO 1.3d.1	SO 2.5b.1	SO 2.6c.1	SO 2.6d.1	SO 2.6f.1	SO 3.7b.1	SO 3.7c.1	SO 4.9a.1	SO 4.9a.2	
PA 1 / TO 3	SO 1.3a.1 Improve support systems tailored for start-ups and existing SMEs, focused on cross-border cooperation		3	0	2	0	0	1	0	1	1	8
	SO 1.3d.1 Expand cross-border economic activity, innovation and exchanges	3		0	1	0	0	1	0	1	1	7
PA 2 TO 5 and TO 6	SO 2.5b.1 Reduce impacts from disasters	1	1		1	3	2	0	0	0	0	8
	SO 2.6c.1 Valorize CB area cultural and natural heritage	1	1	0		1	1	1	0	0	0	5
	SO 2.6d.1 <i>Enhance the effectiveness of biodiversity protection activities</i>	0	0	1	1		3	0	0	0	0	5
	SO 2.6f.1 <i>Enhance water and soil management</i>	0	0	3	1	3		0	0	0	0	7
PA 3 / TO 7	SO 3.7b.1 Improve accessibility of the CB area	2	2	1	2	0	0		2	2	0	11
	SO 3.7c.1 Improve transportation environmental impact	0	0	0	0	1	2	0		0	0	3
PA 4 / TO 9	SO 4.9a.1 Improve access to high-quality health services in the CB area	1	0	0	0	0	0	0	0		0	1
	SO 4.9a.2 Increase the capacity of social enterprises in the CB area	1	1	0	0	0	0	0	0	0		2
Vertical sums		9	8	5	8	8	8	3	2	4	2	

Influence Factor Average: 5.7

Sensitivity Factor Average: 5.7

Table 2: Classification of Specific Objective into categories

	Critical Objective	Sensitive Objective	Strategic Objective	Neutral Objective
Priority Axis 1 / TO 3				
SO 1.3a.1			X	
SO 1.3d.1			X	
Priority Axis 2 / TO 5 & 6				
SO 2.5b.1	X			
SO 2.6c.1		X		
SO 2.6d.1		X		
SO 2.6f.1			X	
Priority Axis 3 / TO 7				
SO 3.7b.1	X			
SO 3.7c.1				X
Priority Axis 4 / TO 9				
SO 4.9a.1				X
SO 4.9a.2				X

Critical Objectives: SO 2.5b.1 “Reduce impacts from disasters “ and SO 3.7b.1 “Improve accessibility of the CB area“ for PA 2 and PA 3 respectively, are classified as critical objectives since they exhibit higher than 5.7 factors for influence and less than 5.7 for sensitivity.

Sensitive Objectives: SO 2.6c.1 “Valorize CB area cultural and natural heritage” and SO 2.6d.1 “Enhance the protection of CB area ecosystems” for PA 2 are classified as sensitive as they have a lower than 5.7 influence factor while the sensitivity factor is higher than 5.7.

Strategic Objectives: Both SOs for PA 1 (SO 1.3a.1 “Improve support systems tailored for start-ups and existing SMEs, focused on cross-border cooperation” and SO 1.3d.1 “Expand cross-border economic activity, innovation and exchanges”) are classified as strategic objectives as well as the fourth SO of PA 2 (SO 2.6f.1 “Enhance water and soil management”).

Neutral Objectives: The 2nd SO of PA 3 (SO 3.7c.1 *Improve transportation environmental impact*) and both SOs of PA 4 (SO 4.9a.1 *Improve access to high-quality health services in the CB area* and SO 4.9a.2 *Increase the capacity of social enterprises in the CB area*) are classified as neutral objectives as both their influence and sensitivity factors are lower than 5.7.

In general, the internal coherence of the Programme’s specific objectives is considered to be positive and significant on average. In particular it is worth mentioning that there has not been observed any case where a negative relationship between specific objectives was estimated which indicates that the Programme’s target setting and strategy is sound and provides objectives with synergies, complementarities and no conflicts at all.

1.4 Evaluation of the External Coherence and synergies with other OPs

Using similar methodology to the one utilized in the internal coherence subsection that was presented, the specific objectives of the OP will be examined in relation to the main reference strategic-policy documents which are the Position Papers for both countries and the Partnership Agreement of Greece. The evaluation of the synergies of the OP's with other operational Programmes will be specifically examine the synergies between the OP and the Greek sectoral OPs YMPERAA, EPANEK, and the ROPs of Anatoliki Makedonia Thraki and Kentriki Makedonia.

1.4.1 Position Paper Greece

The Position Paper for Greece has outlined the following priorities that concern European Territorial Cooperation. The external coherence evaluation examines the relevance and coherence between these priorities and the specific objectives of the OP's.

1. Strengthening research, technological development and innovation, in particular on direct communication and links between the research and business communities, especially in the northern borders.
2. Protecting the environment and promoting resource efficiency.
3. Promoting sustainable transport and removing bottlenecks in key network infrastructure (e.g. the completion of the vertical axes of the Egnatia Highway, TEN-T networks, especially connectivity towards neighboring regions and sea links.
4. Supporting modernization of EU customs infrastructure, equipment, and systems, as well as administrative capacity building, as appropriate.
5. Improving transnational and cross-border aspects of governance related to cross-border crime and security, including the financing of capacity-building in customs systems.
6. Dissemination of innovative technologies and know-how.
7. Strengthening strategic cooperation between public authorities and economic development bodies.
8. Protecting and enhancing natural resources and heritage.
9. Promoting renewable energy and energy efficiency.
10. Reducing maritime risks and improving maritime safety and security in the Mediterranean Sea; and improving accessibility to the sea and local ports through the use of intermodal transport solutions.
11. Addressing weaknesses to its tourist product through the cooperation with other Mediterranean countries.
12. Enhancing the potential of the blue economy and generating sustainable growth and new jobs in maritime sectors, such as the development of maritime and coastal tourism.

13. Improving coherence, coordination and alignment of policies and instruments having an impact on the maritime economy. Cooperation should focus on marine knowledge, Maritime Spatial Planning and Integrated Maritime Surveillance.

1.4.2 Position Paper Bulgaria

The position paper for Bulgaria outlines the following investment priorities that consider being the most relevant for European territorial cooperation in Bulgaria:

1. TEN-T connections: improving navigation on the Danube, cross-border connections, etc.
2. Exchange of experience promoting social inclusion, notably for the Roma community.
3. Technology transfer.
4. Water quality and flood prevention.
5. Energy efficiency and low-carbon economy.
6. To facilitate faster, secure and efficient trade and to combat cross-border crime, EU customs infrastructure, equipment and systems at external borders and at customs border crossing points (air, sea, and land) need modernization, as well as administrative capacity building.

1.4.3 Partnership Agreement Greece

The Greek PA has the following strategic areas of the territorial cooperation for the Greece-Bulgaria.

1. Protection, Management and Promotion of environmental resources
2. Cooperation and linking in health and social protection issues
3. Support and promotion of the human resources – Support of preparatory actions for the upcoming open work environment.
4. Encouragement of entrepreneurship and actions for the restructuring of the economy.

The following table presents the results for the examination of the OP’s external cohesion in relation with the aforementioned reference documents.

Table 3: External Cohesion Matrix

OP's Specific Objectives		PP Greece	PP Bulgaria	PA Greece
PA 1 / TO 3	SO 1.3a.1 Improve support systems tailored for start-ups and existing SMEs, focused on cross-border cooperation	1	1	3
	SO 1.3d.1 Expand cross-border economic activity, innovation and exchanges	2	2	3
PA 2 / TO 5 & 6	SO 2.5b.1 Reduce impacts from disasters	2	3	2
	SO 2.6c.1 Valorise CB area cultural and natural heritage	3	0	2
	SO 2.6d.1 Enhance the effectiveness of biodiversity protection activities	3	1	3
	SO 2.6f.1 Enhance water and soil management	3	3	3
PA 3 / TO 7	SO 3.7b.1 Improve accessibility of the CB area	3	3	0
	SO 3.7c.1 Improve transportation environmental impact	3	3	1
PA 4 / TO 9	SO 4.9a.1 Improve access to high-quality health services in the CB area	0	0	3
	SO 4.9a.2 Increase the capacity of social enterprises in the CB area	1	3	3

The values for measuring the cohesion between the specific objectives and the reference documents are as follows:

-1 Negative effect

0 Neutral effect

1 Positive but weak effect

2 Positive and significant effect

3 Very positive and strong effect

In general the OP's specific objectives are exhibiting a significant cohesion in relation with the main reference documents and their objective/goals/aims/priorities. The only special objective that displays a weak but positive relation is SO.4.9a.1 that refers to health services. The specific objective that displays the strongest cohesion is SO.2.6f.1 (value of 3). To conclude, the OP's strategy and set objectives display a strong and positive relation to the main reference documents which results in evaluating very positively the Programme's external coherence. It should be noted that the evaluation used the objectives and aims in the reference documents that refer exclusively for European Territorial Cooperation (ETC hereafter) which results in rather strict evaluations for some specific objectives that are marked having 0 effect / relation to the reference documents' very specific objectives for ETC. This (mark 0) evaluation should not be regarded as problematic target setting or strategy for the OP. The table that follows displays the synergies that are estimated to exist between this OP and the relevant OPs and ROPs of Greece by filtering the common investment priorities (in which as a result of being in both Programmes there are synergies)

Table 4: Synergies between CBC Greece Bulgaria OP and other OPs and ROPs

TO / IP	ROP KM	ROP AMTH	YMPERAA	EPANEK	CBC GR-BG
TO 3					
3a	v	v		v	v
3d	v	v		v	v
TO 5					
5b		v	v		v
TO 6					
6c	v	v		v	v
6d	v	v	v		v
6f	v			v	v
TO 7					
7b	v	v	v		v
7c			v		v
TO 9					
9a	v	v			v

Where: KM is Kentriki Makedonia, AMTH is Anatoliki Makedonia Thraki, YMPERAA is the OP for the Transport and Environment sectors and EPANEK is the OP for Competitiveness, Entrepreneurship and Innovation.

1.5 Evaluation of the Intervention Logic

1.5.1 Priority Axis 1 / Thematic Objective 3

IP 3a “Promoting entrepreneurship, in particular by facilitating the economic exploitation of new ideas and fostering the creation of new firms, including through business incubators”

SO.1.3a.1 – “Improve support systems tailored for start-ups and existing SMEs, focused on cross-border cooperation”

- **TA.3a.1 – “Improvement / modernization of business-hosting facilities such as business incubators”**
- **TA.3a.2 – “Development of business support services (ICT systems)”**
- **TA.3a.3 – “Development of services fostering productivity”**

The proposed types of actions are expected to have outputs such as number of business hosting facilities improved, number of ICT systems developed, number of employees trained in new techniques and technologies (or hours of training). These outputs will have as expected results the increase in the number of businesses benefiting from upgraded business-hosting capacity, other business-support facilities and/or business services, and an increase in the number of businesses participating in ICT systems (e.g. web-platforms). Other

expected results (which are not covered by existing results indicators) are the increase in the GVA of participating companies and the increase in employment in participating companies. The accomplishment of the SO.1.3a.1 is possible through these results which will in turn help achieving the results that the member states seek to attain by using the Union support. This transition is testable by examining the changes in the results and outputs that are mentioned using quantitative data.

IP 3d “Supporting the capacity of SMEs to grow in regional, national and international markets and to engage in innovation processes”

SO.1.3d.1 – “Expand cross-border economic activity, innovation and exchanges through the support of SME growth”

- ***TA.3d.1 – “Creation of clusters or other types of “networks” for the achievement of cost-savings”***
- ***TA.3d.2 – “Collaboration schemes between businesses and non-businesses for the tourism / culture area - such as accommodation facilities”***
- ***TA.3d.3 – “Development and test control systems for branding of “green” and “traditional” products”***
- ***TA.3d.4 – “Joint R&D activities to benefit the local production system with a cross-border dimension, such as cross-border collaboration between businesses”***
- ***TA.3d.5 – “Support for intellectual property right development”***
- ***TA.3d.6 – “Joint or common (horizontal) export support services for CB businesses”***
- ***TA.3d.7 – “Cross-border business-plans with pilot applications for individual businesses and/or sectors/sub-sectors”***

The proposed actions for SO.1.3d.1 have outputs such as number of clusters and other collaborative schemes, number of joint branding projects, number of businesses participating in R&D related activities. These outputs are estimated that will have results such as number of CB businesses participating in collaborative schemes, new products (to the market or to the firm) introduced by cross-border area businesses. They should also have results such as an increase in the exports by supported SME businesses, and an increase in the employment by supported SME businesses. It is estimated that the attainment of these results is possible by the aforementioned outputs. The achievement of these results will indeed lead to accomplishing SO.1.3d.1 which in return will lead to achieving the results that the member state seeks to achieve using Union support. The transition from outputs to results is sound and both results and outputs are testable using quantitative data.

1.5.2 Priority Axis 2 / Thematic Objective 5

IP 5b “Promoting investment to address specific risks, ensuring disaster reliance and developing disaster management systems”

SO.2.5b.1 – “Reduce impacts from disasters”

- **TA.5b.1** – “Development of strategies and action plans”
- **TA.5b.2** – “Adaptation/mitigation pilot actions”
- **TA.5b.3** – “Capacity-building actions”
- **TA.5b.4** – “Risks and disaster management actions”

The proposed types of actions are expected to have outputs such as number of joint plans for climate change adaptation/risk prevention, number of adaptation/mitigation pilot actions implemented, number of common risk prevention/response tools and systems developed. These outputs will have as expected results the increase of the percentage of area/surface covered by approved climate change/risk prevention plans and the increase of the percentage of areas protected against flooding. Another expected result (which is not covered by existing results indicators) is the increase of local actors in the CB area involved and participating in actions for prevention/limitation of damages caused by natural disasters. The accomplishment of the SO.2.5b.1 is possible through these results which will in turn help achieving the results that the member states seek to attain by using the Union support. This transition is testable by examining the changes in the results and outputs that are mentioned using quantitative data.

1.5.3 Priority Axis 2 / Thematic Objective 6

IP 6c “Conserving, protecting, promoting and developing natural and cultural heritage”

SO.2.6c.1 – “Valorise CB area cultural and natural heritage”

- **TA.6c.1** – “Capacity-building actions”
- **TA.6c.2** – “Rehabilitation/protection of cultural and natural assets of cross-border significance”
- **TA.6c.3** – “CB area-wide cultural initiatives”

The output from the proposed types of actions is expected to be the number of cultural assets rehabilitated/protected. There are other expected outputs (not covered by existing output indicators) such as the number of people trained in the CB area on cultural and natural heritage preservation topics, number of trainings took place, hours of training, number of cultural events, number of joint events, number of youth and other exchanges, number of actions to preserve traditional jobs. The expected result from these outputs is the (increase in) satisfaction from visits to the supported sites. Other results are the increase in the number of visits in sites of natural heritage, the increase of events/activities in sites of cultural and natural heritage, the increase of employment in the tourism sector, the increase

in the number of people trained on cultural and natural preservation issues. The accomplishment of the SO.2.6c.1 is possible through these results which will in turn help achieving the results that the member states seek to attain by using the Union support. This transition is testable by examining the changes in the results and outputs that are mentioned using quantitative data.

IP 6d “Protecting and restoring biodiversity, soil protection and restoration and promoting ecosystem services including NATURA 2000 and green infrastructures”

SO 2.6d.1 – “Enhance the effectiveness of biodiversity protection activities”

- ***TA.6d.1 – “Development of CB frameworks and platforms”***
- ***TA.6d.2 – “Development of joint strategies & procedures”***
- ***TA.6d.3 – “Development (and pilot application) of joint negotiation, mediation, participation and conflict resolution models”***
- ***TA.6d.4 – “Design risk assessment & management models and strategies”***

The output from the types of actions of the SO 2.6d.1 is expected to be the number of biodiversity preservation projects. There are also other outputs expected, such as number of joint management strategies and procedures, number of meetings of CB local actors, number of actions concerning the NATURA protected areas. The expected result from these outputs is the increase in the percentage of NATURA areas/surface participating in biodiversity preservation strategies and pilot actions. Another expected result is the increase in the usage of new methods and technologies for biodiversity monitoring and management. The achievement of these results will indeed lead to accomplishing SO.2.6d.1 which in return will lead to achieving the results that the member state seeks to achieve using Union support. The transition from outputs to results is sound and both results and outputs are testable using quantitative data.

IP 6f “Promoting innovative technologies to improve environmental protection and resource efficiency in the waste sector, water sector, soil protection or to reduce air pollution”

SO 2.6f.1 – “Enhance water and soil management”

- ***TA.6f.1 – “Development of CB frameworks and platforms”***
- ***TA.6f.2 – “Development of CB eco-innovation partnerships”***
- ***TA.6f.3 – “Pilot applications or mainstreaming of existing innovative methods/technologies”***
- ***TA.6f.4 – “Promoting “green behavior” campaigns”***

The output expected from the types of actions described in the SO.2.6f.1 is the number of joint projects dealing with common water management issues. However there are other expected outputs such as number of platforms developed in the areas of water management and those of soil management, number of CB eco-innovation partnerships

developed, number of projects dealing with soil management issues, number of “green-behavior” campaigns organized in the areas of water and soil management. These outputs should have results (not mentioned though) such as increase in the percentage of areas/surface where water management actions took place, increase in the percentage of areas/surface where soil management actions took place, increase in the number of projects for soil erosion prevention and desertification, increase in the percentage of contaminated lands rehabilitated. The expected results will indeed lead to the accomplishment of SO.2.6f.1 which in return will lead to the achievement of the results that the member state seeks to achieve using Union support. The transition from outputs to results is sound and both results and outputs are testable using quantitative data.

1.5.4 Priority Axis 3 / Thematic Objective 7

IP 7b – “Enhancing regional mobility by connecting secondary and tertiary nodes to TEN-T infrastructure, including multimodal nodes”

SO 3.7b.1 – “Improve accessibility of the CB area”

- ***TA.7b.1 – “Construction of new or upgrading of existing infrastructure and construction works of CB importance especially through the completion of gaps in the TEN-T network and the existing secondary and tertiary network connected to it”,***
- ***TA.7b.2 – “Construction of new or upgrading existing complementary infrastructures and connections” and***
- ***TA.7b.3 – “Planning for logistics centers, multimodal nodes etc”.***

All of the above proposed actions are expected to have output such as total length of reconstructed or upgraded roads. This output will have as result the decrease in travel distance at reconstructed / rehabilitated roads. Other or alternative expected results (which are not covered by existing result indicators) would be the percentage of reconstructed kms to number of existing kms (national/provincial/municipal road network). The accomplishment of the SO 3.7b.1 is possible through this result which will in turn help achieving the results that the member states seek to attain by using the Union support. This transition is highly probable and testable by examining the changes in the results and output that are mentioned using quantitative data.

IP 7c – “Developing and improving environmentally-friendly (including low-noise) and low-carbon transport systems, including inland waterways and maritime transport, ports, multimodal links and airport infrastructure, in order to promote sustainable regional and local mobility”

SO 3.7c.1 – “Improve transportation environmental impact”

- ***TA.7c.1 – “Transport investments aiming at reducing the environmental footprint of transport activities (including transport services)”,***

- **TA.7c.2** – *“Development and introduction of transport monitoring systems (targeting passenger and/or goods mobility, infrastructure state-of-repairs, etc) and intelligent transport systems for goods and passengers” and*
- **TA.7c.3** – *“Development of new technologies/methods for the design and implementation of environment-friendly transport infrastructures and systems”.*

All of the above proposed actions would have output such as number of projects on intelligent transport systems interventions. The output will have as result the number of intelligent transport system users. The accomplishment of the SO 3.7c.1 is possible through this result which will in turn help achieving the results that the member states seek to attain by using the Union support. This transition is highly probable and testable by examining the changes in the result and output that are mentioned using quantitative data.

1.5.5 Priority Axis 4 / Thematic Objective 9

IP 9a – “Investing in health and social infrastructure which contribute to national, regional and local development, reducing inequalities in terms of health status, promoting social inclusion through improved access to social, cultural and recreational services and the transition from institutional to community-based services”

SO 4.9a.1 – “Improve access to high-quality health services in the CB area”

- **TA.9a.1** – *“Support centers of reference (for health threats, rare diseases, organ donation) and develop joint cross-border plans and principles for the sharing of human and information resources”,*
- **TA.9a.2** – *“Promote cooperation between healthcare authorities by implementing the shared use of resources and expertise in the cross-border healthcare provision wherever added value can be achieved”,*
- **TA.9a.3** – *“Support to renovation and equipping of existing and new primary health care practices in CB areas with serious limitations in access to primary health care” and*
- **TA.9a.4** – *“Development of cross-border mobile services, telemedicine and telecare infrastructure will be supported, in order to alleviate the local lack of healthcare workers”.*

All of the above proposed actions are expected to have outputs such as number of health care institutions reorganized, modernized or reequipped and number of ICT systems developed. These outputs will have as result (an increase in) the population that is covered by improved health services. The accomplishment of the SO 4.9a.1 is possible through this result which will in turn help achieving the results that the member states seek to attain by using the Union support. This transition is highly probable and testable by examining the changes in the result and outputs that are mentioned using quantitative data.

IP 9a – “Investing in health and social infrastructure which contribute to national, regional and local development, reducing inequalities in terms of health status, promoting social inclusion through improved access to social, cultural and recreational services and the transition from institutional to community-based services”

SO 4.9a.2 – “Increase the capacity of social enterprises in the CB area”

- **TA.9a.5** – “Support for the establishment and provision of operational support to Social Enterprises that offer innovative solutions, promote inclusive CB labor markets and social services accessible to all in the CB area”,
- **TA.9a.6** – “Support for social franchising which is the cross-border transfer of a social enterprise business model from one side of the border to the other” and
- **TA.9a.7** – “Support for the development and implementation of methodologies for monitoring and evaluation of social, economic and environmental impacts of social economy in the CB area”.

The types of actions for SO 4.9a.2 have output such as number of supported social enterprises. Other output would be the number of new social enterprises that are supported. This output will have as result an increase in CB employment at social enterprises. The accomplishment of the SO 4.9a.2 is possible through this result which will in turn help achieving the results that the member states seek to attain by using the Union support. This transition is particularly feasible and testable by examining the changes in the result and output that are mentioned using quantitative data.

2. Evaluation of the Indicators’ Framework

2.1 Introduction

The evaluation of the indicators framework is implemented through the use of the SMART criteria and with further comments, suggestions and proposals for each indicator whether it is an output or a result indicator. The SMART criteria are five and refer to examination of the indicators’:

Specific: If the indicator is defined in a way so that it is specific and able to describe the outputs or the results of the proposed actions, if its definition is specific and sound etc.

Measurable: Ability to measure the indicator, if its definition leads to clear measurable quantitative data

Achievable: Refers to the baseline-target values and if they are realistic and achievable

Relevant: If the indicator is relevant to the proposed actions, specific objectives etc.

Timely bound: If it is possible to obtain in time the necessary data for the indicators from the data sources that the PDT identifies.

Furthermore the evaluation examines if all output indicators reflect the proposed actions / measures and if all specific objectives include at least one results indicator. Regarding the results indicators’ definitions, the evaluation examines if the definitions reflect a measurement in a variable (correct) or a measurement in a change of a variable (incorrect). For Programme specific indicators, the definitions’ suitability is examined with respect to its ability to describe in detail the outputs or results of the proposed actions and if it needs to be more specific. Finally the evaluation checks if the indicators’ definitions are proper for use in output or result indicators. In other words, a definition of an output indicator should refer to an output and not a result (and vice versa). The following table presents the main findings of the evaluation concerning the indicators’ framework while subsections 2.2, and 2.3 present an overview of the results that appear in the table and highlight any noteworthy cases of indicators. Subsection 2.4 provides the evaluation of the milestones in the performance framework of the OP.

The grading for the SMART criteria in the table that follows is:

- 1: Very negative
- 2: Negative
- 3: Neutral - Marginally Acceptable / Adequate
- 4: Good
- 5: Very Good - Excellent

Table 5: Indicators Framework Evaluation

#	Code	Indicator	Units	Source Frequency	/ Baseline / Target	Ex-ante Evaluation Comments	Suitability criteria (SMART)				
							Specific	Measurable	Achievable	Relevant	Timely
PA 1 / TO 3											
COMMON OUTPUT INDICATORS FOR IP 3a											
1	PO.3a.1	- Number of enterprises receiving support	- Enterprises	- Programme MIS / Annually	- / 50	Common output indicator. The target value of 100 enterprises seems achievable. However it should be clarified that, given the approximately 10.790.000 Euros for type 67 interventions, 5 business-support facilities will be constructed/upgraded with an assumed cost of 2mil Euros per facility, with an assumed capacity of 20 enterprises per facility. In such a case, the result is indeed 100 enterprises.	5	5	4	5	5
PROGRAMME SPECIFIC OUTPUT INDICATORS FOR IP 3a											
PROGRAMME SPECIFIC RESULTS INDICATORS FOR SO 1.3a.1 To improve support systems tailored for start-ups and existing SMEs, focused on cross-border cooperation.											
2	PR.3a.1.1	Entrepreneurial business climate	entrepreneurship climate barometer	Survey to a representative sample of target SMEs /2015-2018-2023	100 / 120	The proposed results indicator is not the best possible choice with respect to its objectivity and relevance to the results of the SO. The results that the member state seeks to achieve for this SO are “Improved capacities of regional actors / facilities to support the development/ growth of businesses” and “ Improved Cross-Border business survival”. An indicator that measures the capacity of the support facilities for businesses such as “number of businesses benefiting from upgraded business	3	3	3	2	3

#	Code	Indicator	Units	Source Frequency	/ Baseline / Target	Ex-ante Evaluation Comments	Suitability criteria (SMART)				
							Specific	Measurable	Achievable	Relevant	Timely
						<p>hosting facilities / support – services” would be a sound choice.</p> <p>The PDT could consider introducing specific results indicators such as “GVA or Exports of businesses that benefit from improved support systems...” and/or “Employment in businesses that benefit from improved support systems....”.</p> <p>Another potential indicator could measure business survival (which is a result that the member states seek to achieve). The business survival rate indicator data are available through Eurostat for Bulgaria only.</p>					
COMMON OUTPUT INDICATORS FOR IP 3d											
-	-	-	-	-	-	-	-	-	-	-	-
PROGRAMME SPECIFIC OUTPUT INDICATORS FOR IP 3d											
3	PO.3d.1	Number of clusters and other collaborative schemes	Collaborative Schemes	Programme MIS / Annually	- / 3	<p>The definition of the indicator is too generic. It groups together dissimilar elements such as clusters and other collaborative schemes (which specifically refer to the tourism / culture industry) whereas it is more compliant to the proposed actions to have two different output indicators one for clusters created and one for collaboration schemes created.</p> <p>The definition of the indicator should specify exactly to what it refers to. Number of clusters that are created? Upgraded?</p>	3	5	5	4	5

#	Code	Indicator	Units	Source / Frequency	Baseline / Target	Ex-ante Evaluation Comments	Suitability criteria (SMART)				
							Specific	Measurable	Achievable	Relevant	Timely
						Realistic and achievable target value based on budget allocated for the specific type of action (code 63, approximately six million Euros with an assumed cost per cluster of 2 million euros).					
4	PO.3d.2	Number of enterprises cooperating with research institutions	Enterprises	Programme MIS / Annually	- / 20	Common output indicator. Sound connection and association to planned actions.	5	5	5	5	5
PROGRAMME SPECIFIC RESULTS INDICATORS FOR SO 1.3d.1 Expand cross-border economic activity, innovation and exchanges											
5	PR.3d.1.1	Awareness of business opportunities beyond local markets	awareness scale	Survey to a representative sample of target SMEs / 2015-2018-2023	100 / 120	<p>The proposed results indicator is not the best possible choice with respect to its objectivity. The PDT should consider using such an indicator if the use of other indicators (such as the ones proposed below) is restricted somehow.</p> <p>The indicator is not very representative with respect to the results that the member state seeks to achieve. The main result is the increase in exports, therefore a more suitable indicator would have been one with a definition such as “Exports by businesses participating in collaborative schemes”</p> <p>Another economic variable which is crucial is the level of employment in the CB area, therefore the PDT could consider complementing the indicators framework with a results indicator such as “Employment in businesses participating in</p>	2	3	3	2	3

#	Code	Indicator	Units	Source Frequency	/ Baseline / Target	Ex-ante Evaluation Comments	Suitability criteria (SMART)				
							Specific	Measurable	Achievable	Relevant	Timely
						collaborative schemes”. Finally, another potential indicator could be the “number of new products / services produced in collaboration between businesses / sectors on both sides of the border or of CB nature.” which is directly linked to the results that the member states seek to achieve.					
COMMON OUTPUT INDICATORS FOR IP 5d											
6	PO.5b.1	Population benefiting from flood protection measures	Persons	Authorities for civil protection / Annually	-/300.000	Common Indicator Realistic and achievable target value	5	5	5	5	5
PROGRAMME SPECIFIC OUTPUT INDICATORS FOR IP 5d											
PROGRAMME SPECIFIC RESULTS INDICATORS FOR SO 2.5b.1 Reduce impacts from disasters											
7	PR.5b.1.1	CB Areas in risk of natural disasters covered by jointly coordinated CB action-management plans	% of the surface	Authorities for civil protection Programme MIS / Annually	0/25%	The indicator is very well specialized to correspond with the planned actions. The indicator is able to successfully measure the expected results and the target value is considered realistic and achievable.	5	5	5	5	5
COMMON OUTPUT INDICATORS FOR IP 6c											
-	-	-	-	-	-	-	-	-	-	-	-
PROGRAMME SPECIFIC OUTPUT INDICATORS FOR IP 6c											

#	Code	Indicator	Units	Source Frequency	Baseline / Target	Ex-ante Evaluation Comments	Suitability criteria (SMART)				
							Specific	Measurable	Achievable	Relevant	Timely
8	PO.6c.1	Number of cultural and/or natural assets rehabilitated/protected	Number of cultural/natural assets	Programme MIS / Annually	-/8	<p>Sound connection and association to planned actions.</p> <p>Very well specialized to correspond with the planned actions, including both cultural and natural aspects.</p> <p>Realistic and achievable target value</p>	5	5	5	5	5
PROGRAMME SPECIFIC RESULTS INDICATORS FOR SO 2.6c.1 Valorise CB area cultural and natural heritage											
9	PR.6c.1.1	Satisfaction from visits to the supported sites	Satisfaction scale	<p>Visitor satisfaction survey (on a voluntary basis) at the sites</p> <p>/ 3 times (1.first year, 2. 2018, 3. end of programme)</p>	-/20%	<p>The proposed results indicator is not the best possible choice and it is very difficult to be measured. The visitor satisfaction survey which is proposed at the sites is voluntary thus there might be false results.</p> <p>Maybe the indicator could be "Number of events taken place in supported CB cultural and natural heritage sites". Organizing events in those sites would result to the valorization and promotion of the sites inevitably increasing the visitors and promoting knowledge transfer and exchange within the CB area.</p>	3	2	2	4	5
COMMON OUTPUT INDICATORS FOR IP 6d											
-	-	-	-	-	-	-	-	-	-	-	-
PROGRAMME SPECIFIC OUTPUT INDICATORS FOR IP 6d											
10	PO.6d.1	Number of biodiversity	Projects	Programme MIS /	-/4		3	5	5	4	5

#	Code	Indicator	Units	Source Frequency	/ Baseline / Target	Ex-ante Evaluation Comments	Suitability criteria (SMART)				
							Specific	Measurable	Achievable	Relevant	Timely
		preservation projects		Annually		The indicator is able to successfully measure the expected outputs and the target value is considered realistic and achievable based on methodological documentation.					
PROGRAMME SPECIFIC RESULTS INDICATORS FOR SO 2.6d.1 Enhance the protection of CB area ecosystems											
11	PR.6d.1.1	% of Natura areas (surface) participating in biodiversity preservation strategies and pilot actions in the 2014-2020 programming period	% of hectares	Programme MIS / Annually	2,717,888 / 17%	<p>The indicator is able to successfully measure the expected results and the target value is considered realistic and achievable.</p> <p>However, the baseline and the target values must be in the same measurement units in order to be comparable. The baseline value is the total area whereas it should be the area currently covered (before the interventions).</p>	5	3	5	5	5
COMMON OUTPUT INDICATORS FOR IP 6f											
-	-	-	-	-	-	-	-	-	-	-	-
PROGRAMME SPECIFIC OUTPUT INDICATORS FOR IP 6f											
12	PO.6f.1	Number of joint projects dealing with common water management issues	Number of projects	Programme MIS / Annually	-/7	<p>The indicator is able to successfully measure the expected outputs and the target value is considered realistic and achievable.</p> <p>However, there is no indicator for soil</p>	4	5	5	4	5

#	Code	Indicator	Units	Source / Frequency	Baseline / Target	Ex-ante Evaluation Comments	Suitability criteria (SMART)				
							Specific	Measurable	Achievable	Relevant	Timely
						management. As the suggested types of actions involve actions for soil management and the expected results that the member states seek to achieve is the prevention of soil erosion and desertification as well as rehabilitation of contaminated lands it is very important the indicator to address “soil management” as well. Otherwise, the SO and the type of actions should be re-defined					
PROGRAMME SPECIFIC RESULTS INDICATORS FOR SO 2.6f.1 Enhance the capacity of the CB area to effectively protect the environment and use resources sustainably											
13	PR.6f.1.1	% of total renewable CB area water resources under improved management systems	% of hm ³	Water Basin Management Plans / Programme MIS / Annually	23.500 / 30%	<p>The indicator is able to successfully measure the expected results and the target value is considered realistic and achievable.</p> <p>However, there is no indicator for soil management. As the suggested types of actions involve actions for soil management and the expected results that the member states seek to achieve is the prevention of soil erosion and desertification as well as rehabilitation of contaminated lands it is very important the indicator to address “soil management” as well. Otherwise, the SO and the type of actions should be re-defined</p>	5	5	5	5	5
COMMON OUTPUT INDICATORS FOR IP 7b											

#	Code	Indicator	Units	Source Frequency	/ Baseline / Target	Ex-ante Evaluation Comments	Suitability criteria (SMART)				
							Specific	Measurable	Achievable	Relevant	Timely
14	PO.7b.1	Total length of reconstructed or upgraded roads	Number of Kms	Programme MIS / Annually	na/37 km	<p>Common output indicator</p> <p>The indicator is compatible with planned actions of the TO 7 and is able to successfully measure the expected outputs.</p> <p>The indicator is very well specialized to correspond with relevant actions.</p> <p>The target value is considered realistic and achievable.</p>	5	5	5	5	5
PROGRAMME SPECIFIC OUTPUT INDICATORS FOR IP 7b											
-	-	-	-	-	-	-	-	-	-	-	-
PROGRAMME SPECIFIC RESULTS INDICATORS FOR SO 3.7b.1 Improve accessibility of the CB area											
15	PR.7b.1.1	Travel-distance reduction at reconstructed / rehabilitated roads	%	Road construction studies / Annually	-/30%	<p>The result indicator should better be defined as time distance rather than travel distance. It should be noticed that it shouldn't measure change but the absolute value. In these terms, the baseline and target values would be changed accordingly (even if the term “reduction” could remain, the change of 30% in travel distance or time distance is likely to be optimistic).</p> <p>However, given the fact that the interventions are not already known, the calculation of baseline and target values are impossible at this time. The PDT could therefore leave the corresponding cells empty in order to be filled in later when the relevant information becomes available.</p>	4	5	3	5	5

#	Code	Indicator	Units	Source Frequency	/ Baseline / Target	Ex-ante Evaluation Comments	Suitability criteria (SMART)				
							Specific	Measurable	Achievable	Relevant	Timely
						The data source of respective road construction studies is considered to be accurate. Annual measurement of the indicator is considered not to comply well with the nature of (quite often) lengthy interventions.					
COMMON OUTPUT INDICATORS FOR IP 7c											
PROGRAMME SPECIFIC OUTPUT INDICATORS FOR IP 7c											
16	PO.7c.1	Number of projects on intelligent transport systems interventions	Number	Programme MIS / Annually	-/2	Sound choice for an output indicator linked with proposed types of actions. The target value is considered realistic and achievable.	5	5	5	5	5
PROGRAMME SPECIFIC RESULTS INDICATORS FOR SO 3.7c.1 Improve transportation environmental impact											
17	PR.7c.1.1	Number of intelligent transport system users	Annual number of users	Intelligent transport system operators / at least twice: 2018 and 2023.	- / 3000	The indicator is directly connected with the outputs of the types of actions but does not directly measure a result linked with the specific objective 3.7c.1. One possible selection would be “Contribution of the transport sector in the emission of greenhouse gases”. The data source and the frequency of measurements are considered to be well selected. The target value is considered realistic and achievable.	4	5	5	3	5
COMMON OUTPUT INDICATORS FOR IP 9a											

#	Code	Indicator	Units	Source Frequency	/ Baseline / Target	Ex-ante Evaluation Comments	Suitability criteria (SMART)				
							Specific	Measurable	Achievable	Relevant	Timely
PROGRAMME SPECIFIC OUTPUT INDICATORS FOR IP 9a											
18	PO.9a.1	Number of health care institutions reorganized, modernized or reequipped.	Number	Programme MIS / Annually	na/12	<p>The indicator is compatible with planned actions of the TO 9 and is able to successfully measure the expected outputs thereof.</p> <p>The indicator is well defined and specialized to correspond with relevant actions.</p> <p>The target value is considered realistic and achievable.</p>	5	5	5	5	5
19	PO.9a.2	Number of supported social enterprises	Number	Programme MIS / Annually	na/16	<p>The indicator is compatible with planned actions of the TO 9 and is able to successfully measure the expected outputs thereof.</p> <p>The indicator is well defined and specialized to correspond with relevant actions.</p> <p>The target value is considered realistic and achievable.</p>	5	5	5	5	5
20	PO.9a.3	Number of ICT systems developed	Number	Programme MIS / Annually	na/5	<p>The indicator is compatible with planned actions of the TO 9 and is able to successfully measure the expected outputs thereof.</p> <p>The indicator is well defined and specialized to correspond with relevant actions.</p> <p>The target value is considered realistic and achievable.</p>	5	5	5	5	5

#	Code	Indicator	Units	Source Frequency	/	Baseline / Target	Ex-ante Evaluation Comments	Suitability criteria (SMART)				
								Specific	Measurable	Achievable	Relevant	Timely
PROGRAMME SPECIFIC RESULTS INDICATORS FOR SO 4.9a.1 Improve access to high-quality health services in the CB area												
21	PR.9a.1.1	Population covered by improved health services in the 2014-2020 programming period	Number of inhabitants	Official statistics / Annually		0 / 720,000	<p>The definition of the indicator reflects a common output indicator and not a result one according to Regulation (EU) No 1301/2013.</p> <p>One possible correction would be “Percentage of population with access to improved health services”.</p> <p>This correction would have an effect in baseline and target values which would change accordingly.</p> <p>The indicator, after the correction will be better defined and appropriate to describe the expected results that will lead to achieving the relevant specific objective.</p> <p>The target value is considered realistic and achievable.</p>	4	5	5	5	5
PROGRAMME SPECIFIC RESULTS INDICATORS FOR SO 4.9a.2 Increase the capacity of social enterprises in the CB area												
22	PR.9a.2.1	Increase in CB employment at social enterprises	number	Social Enterprises – Programme MIS / Measured in 2018 and in 2023		384 / 496	<p>The result indicator is measuring absolute value, so the word “increase” should be deleted since the change is obvious by comparing baseline and target values.</p> <p>Sound connection and association to planned actions. The indicator, after the correction, will be better defined and appropriate to describe the expected results that will lead to achieving the relevant specific objective.</p> <p>The target value seems realistic and plausible based on the methodological documentation</p>	4	5	5	5	5

#	Code	Indicator	Units	Source Frequency	/	Baseline / Target	Ex-ante Evaluation Comments	Suitability criteria (SMART)				
								Specific	Measurable	Achievable	Relevant	Timely
							provided.					

2.2 Suitability and Relevance of the OP's Indicators

2.2.1 Output Indicators

For PA 1 the OP uses 2 common output indicators and one programme specific output indicator in order to describe the proposed types of actions. All three indicators are grouped together and the PDT has not distributed them properly according to the IP that they refer to and should address this issue in the next version of the OP draft. By examining the indicators and the proposed actions, it can be inferred that the first common indicator refers to IP 3a while the other two refer to IP 3d. With this in mind, the common output indicator for IP 3a is a sound choice since it matches the proposed types of actions and their expected outputs. For IP 3d, PO.3d.2 has some issues. In particular, the definition of the indicator is too generic. It groups together dissimilar elements such as clusters and other collaborative schemes (which specifically refer to the tourism / culture industry) whereas it is more compliant to the proposed actions to have two different output indicators one for clusters created and one for collaboration schemes created. Having that in mind, it is recommended that the PDT could include more programme specific output indicators for IP 3d in order to capture all of the proposed actions. For example, *number of cross-border business plans*, *number of businesses receiving support for intellectual property right development* etc.

For PA 2 the OP uses one common and three programme specific output indicators for the description of the proposed types of actions. These indicators are grouped together without being properly distributed according to the IP that they refer to. By examining the indicators and the proposed actions, it can be inferred that the first (common) indicator refers to IP 5b while the next three refer to each one of the TO 6's IPs. With this in mind, the common output indicator for IP 3a is a sound choice since it matches the proposed types of actions and their expected outputs

For IP 6c, the output indicator has changed in order to integrate the natural aspects along with the cultural ones, thus there is sound connection and association to planned actions.

For IP 6d, the indicator defined seems to be able to successfully measure the expected outputs and corresponds with the planned actions.

As for the output indicator for IP 6f, it is suitable and appropriate concerning its definition, specificity and relevance to the proposed types of actions. Nevertheless, there is no indicator for soil management. However, there is no indicator for soil management. As the suggested types of actions involve actions for soil management and the expected results that the member states seek to achieve is the prevention of soil erosion and desertification as well as rehabilitation of contaminated lands it is very important the indicator to address “soil management” as well. Otherwise, the SO and the type of actions should be re-defined.

For PA3, there is one common output indicator and one specific output indicator corresponding to the two IPs that have been selected. Both of them are considered sound choices and able to successfully measure the expected outputs.

For PA4, there are three programme specific output indicators which display good characteristics and are suitable in describing the outputs of the proposed types of actions.

2.2.2 Results Indicators

There are 2 results indicators set for PA 1 under two IPs (each one with 1 specific objective). The OP does not discern which ones are linked with each of the two specific objectives. It can be inferred that the first corresponds to the 1st SO while the next to the 2nd SO. The PDT should address this issue and produce tables that present results indicators per specific objective as set in the template of the EC288/2014 regulation. The indicators are considered not to be the best possible choice. This is due to that their choice is not optimal with respect to their representativeness towards the desired results that the member states seek to achieve. Both indicators refer to surveys that will be done in order to capture the entrepreneurship climate and business opportunity awareness. Indicators such as these could and should be used only in situations where objective and quantitative indicators are impossible to obtain and therefore survey studies are used as proxies. The main results that the member states seek to achieve are the increase in exports, increase of the capacity of business hosting-support facilities / services, increase in the number of new products (of a CB nature); Therefore a more suitable indicator would have been one with a definition such as “Exports by businesses participating in collaborative schemes”, “Business Survival Rates” etc. Another economic variable which is crucial for both countries is the level of employment in the CB area; therefore the PDT could consider complementing the indicators framework with a results indicator such as “*Employment in businesses participating in collaborative schemes*”. To conclude, it is recommended to replace or supplement both indicators for PA 1 in order to obtain a results indicators framework for PA 1 which will be functional and more objective and representative and more directly linked to the results that the member states seek to achieve. .

There are 4 result indicators set for PA 2 under four IPs.

As in the output indicators, there is no direct linkage of the result indicators to each of the four specific objectives that are set for each IP. It can be inferred that the first corresponds to SO 2.5b.1, the next one to SO 2.6c.1 the third one to SO 2.6d.1 while the fourth one corresponds to SO 2.6f.1.

For SO 2.5d.1, the result indicator has improved based among other things on the recommendations of the ex-ante evaluation in order to include in its definition CB areas in risk of natural disasters covered by jointly coordinated CB action-management plans. For SO 2.6c.1 the definition of the results indicator is not the best possible choice and it is very difficult to be measured. The indicator could be “Number of events taking place in supported CB cultural and natural heritage sites”, as it is better measurable and at the same time matches the desired result for valorization and promotion of the sites in the CB area.

For SO 2.6d.1 the proposed results indicator is correctly defined and is associated successfully with the specific objective and the same qualities are observed for the final results indicator (for PA 2) that covers SO 2.6d.1.

As for SO 2.6f.1, the suggested indicator is able to successfully measure the expected results. However, there is no indicator for soil management. As the suggested types of actions involve actions for soil management and the expected results that the member states seek

to achieve is the prevention of soil erosion and desertification as well as rehabilitation of contaminated lands it is very important the indicator to address “soil management” as well. Otherwise, the SO and the type of actions should be re-defined.

For PA 3, the programme specific result indicator that is used for IP 7b should better be defined as “time distance” rather than “travel distance”. It should be noticed that it shouldn’t measure change but the absolute value. For IP 7c the result indicator chosen is directly connected with the outputs of the types of actions but does not directly measure a result linked with the specific objective 3.7c.1. One possible selection would be “Contribution of the transport sector in the emission of greenhouse gases”.

For PA 4, the first programme specific results indicator titled “Population covered by improved health services” is actually a common output indicator that appears in annex 1 of the ERDF Regulation (EU) No 1301/2013. A possible definition for an appropriate results indicator would be “Percentage of population with access to improved health services”. The second results indicator for IP 9a is titled “Increase in CB employment at social enterprises”. In general it is considered to be a good choice which is associated well with the planned actions. However, the result indicator should not measure the change but the absolute values.

A general comment that concerns all of the OP’s results indicators is that the data source “Programme MIS and/or the generic term “official statistics” should be avoided. It is recommended that the PDT uses statistically verifiable data sources such as “Eurostat” or other more specific Greek and Bulgarian official data sources or even respective studies.

2.3 Baseline – Target Values

The majority of the values for baselines and more importantly for targets both for output and results indicators is complete and contains values that seem to be realistic, achievable and based on sound methodological approaches.

The notable issues concern results indicators for SO.6d.1 and SO.6f.1 where the baseline is area whereas the target is a percentage (which percentage results in an area smaller than the baseline). Essentially it seems that the baseline taken was the total area, whereas the target is the % of the total area that will be covered by the results of the proposed actions. This should be rectified so that the baseline is a % of the total area covered by results today (0% if there are new actions).

Another issue is for target value of the result indicator corresponding to SO 3.7b.1 which is likely to be considered optimistic. Given the fact that the interventions are not already known, the calculation of baseline and target values are impossible at this time. The PDT could therefore leave the corresponding cells empty in order to be filled in later when the relevant information becomes available.

2.4 Evaluation of Milestones in the Performance Framework

The performance framework for the OP has been successfully completed in general. The financial indicators appear to have been correctly calculated and the choice of the output indicators does seem to cover the 50% requirement for each priority axis. Having said that, there is an issue that needs to be addressed that concerns the calculation of the milestones used for the financial indicators. The financial indicators should have milestone values for 2018 that are at least equal to the funding for the years 2014 and 2015 excluding the 6% performance reserve. In other words it should be $0,94 * (\text{funding for 2014} + \text{funding for 2015})$. The milestones utilized thought do not take into account the 6% reserve that needs to be subtracted. The PDT should rectify this and provide the correctly calculated milestones for the financial indicators. The milestones for 2018 do seem achievable for the key implementation step indicators. For each output indicator that does not have a milestone for 2018, there should be a key implementation step indicator providing an alternative proxy milestone. This is not the case however for priority axis 2 of the OP where there are two output indicators chosen for the performance framework that both do not have milestone values for 2018. Instead of having two corresponding key implementation step indicators there is only one. The PDT should complete the performance framework by including the missing indicator. Furthermore there is a possible mistake in the table of the performance framework for PA 2 (page 35) since it refers to indicators CO22 and CO20 whereas it should be only one of them present. The methodology provided by the documentation file for the performance framework has some issues concerning the calculation of targets for 2023. In particular, for the output indicator “number of enterprises receiving support”. The target is set at 100 enterprises for the year 2023. The assumption is that the cost of a business-hosting facility is 2.000.000 Euros. Another assumption is made about the capacity of the facility at 20 enterprises. Both assumptions are acceptable (based on evaluators’ experience of similar projects) even though no references are made as of how did the PDT reached at these numbers. The third assumption is that the average cost per enterprise is 100.000 Euros. With a budget of 10.790.671 Euros the PDT divides with 100.000 and obtains approximately 100 enterprises (should be 108 and not 100 and an 8% difference is too big to be rounded up). This methodological step renders the information about the cost and capacity of the facilities redundant. The sound methodological steps should be, that based on the cost of 2.000.000 and the capacity of 20, with 10.790.761 Euros, there can be (upgraded) 5 facilities that will be able to host $5 \times 20 = 100$ enterprises for 2023. In general (for several of the output indicators in the performance framework), the PDT should provide references concerning the source of the average costs that are used, (cost per km of road, unit cost for health institutions etc.).

3. Evaluation of the Financing Plan

The financial allocation of the OP across the four priority axes is as follows. The leading priority axis is PA 2 “*A Sustainable and climate adaptable Cross-Border area*” which receives 36.170.149 € that correspond to 32,81% of the total funding. PA 3 follows with 29.070.613 € or 26,37%. In the third place is PA 4 with 20.747.400 € and 18,82% while fourth is PA 1 with 17.638.598 € and 16% of the total funding. Technical assistance receives 6% of the total EU funding for the OP which corresponds to 6.614.474 €.

The OP provides in its subsection 1.2 a justification for this allocation by referring to PA 2 (Environment) as the most important, followed by PA 4 (Social Inclusion) and PA 1 (Entrepreneurship) as second and third most important. PA 2 which corresponds to the transport sector is considered again as third most important which contradicts the previous ranking for PA 1. The PDT should address this issue and reform the ranking accordingly. The aforementioned prioritization is not apparent from the OP’s evaluation of the current situation in the CBC area and its problems. It is recommended that the PDT highlights and documents the link between problems / current situation of the CBC area and the prioritization among the PAs so that the evaluation of the financing plan can be more detailed and specific.

Having the above prioritization in mind, the financial allocation is coherent to it as PA 2 as the most important indeed receives the majority of the funds. PA 4 and PA 1 which are the next more important are underfunded in absolute numbers and percentages in comparison to PA 2. This however can be justified by the fact that the actions-interventions required in the transport sector (TO 7) are in general much more costly by nature, in comparison to the interventions for TO 3 and TO 9. In addition to this, one can consider even 30.000.000 Euros as a very limited amount for funding TO 7 projects, but one must consider that TO 7 (as is TO 4, 5 and 6) is heavily funded through National transport sector OPs.

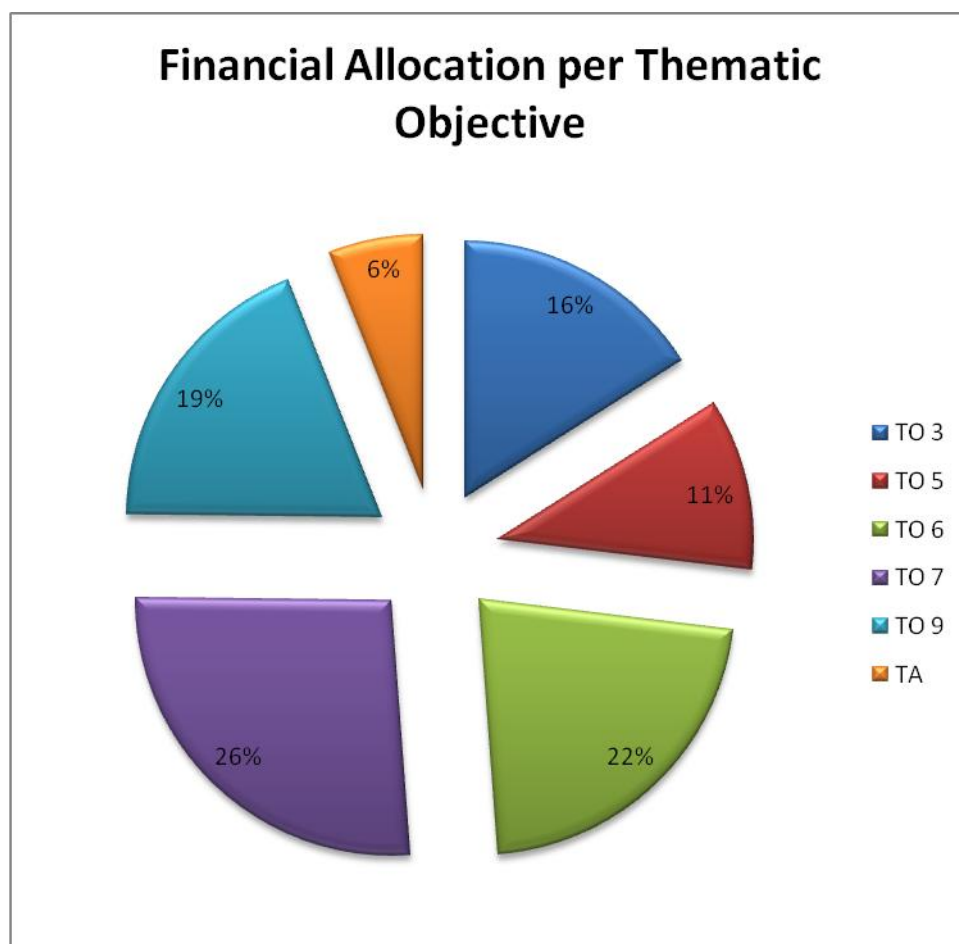
In general, the financial allocation is in accordance to the OP’s strategy and corresponds to the nature of the proposed actions and associated costs under each thematic objective. The following table presents the financial allocation per PA, TO for the OP while chart 1 presents the same information in chart (pie chart) form.

The main issue that requires attention and amendment in the financial allocation is the fact that there is no reference or use of the 6% performance reserve allocation. The annual funding that is presented in the OP (table 15 page 59) does not distinguish between the main allocation funds (94% of the total annual funding) and the 6% that constitutes the performance reserve. The EC288/2014 regulation specifically requires this in the relevant template for the corresponding section/table and the PDT should adhere to it.

Table 6: Financial Allocation of the OP per PA and TA

Priority Axis	Thematic Objective	Financial Allocation (Euros)	Percentage Allocation per TO	Percentage Allocation Per PA
PA 1	TO 3	17.638.598 €	16,00%	16,00%
PA 2	TO 5	12.033.773 €	10,92%	32,81%
	TO 6	24.136.376 €	21,89%	
PA 3	TO 7	29.070.613 €	26,37%	26,37%
PA 4	TO 9	20.747.400 €	18,82%	18,82%
TA	-	6.614.474 €	6,00%	6,00%
Total		110.241.234 €	100,00%	100,00%

Chart 1: Financial Allocation per Thematic Objective



4. Evaluation of the contribution to Europe 2020 and Common Strategic Framework

4.1 Introduction

The evaluation of the contribution to E2020 and the Common Strategic Framework, examines the coherence and relation that the OP's special objective have to the main objectives or flagship initiatives of both E2020 and the CSF. The methodology used is similar to the one utilized in the examination of external coherence that was previously presented in section 1 of this evaluation. The main difference is that the examination here is more detailed and checks relationships across objectives and not the reference document in general. In subsection 2 that follows, the E2020 and CSF documents and their targets/objective/initiatives are presented and then tables 7 and 8 present the contribution-coherence between the objectives and flagship initiatives of E2020 and the OP's specific objectives. Finally table 9 presents the contribution of the OP and its' specific objectives towards the objectives of the CSF.

4.2 Contribution to Europe 2020

The strategy for Europe 2020: Strategy for smart, sustainable and inclusive growth aims in creating the necessary conditions to turn the EU into a smart, sustainable and inclusive economy that is able to deliver high levels of employment, productivity and social cohesion.

E2020 has set the following headline targets that will be used for examining the contribution of the OP's towards E2020:

1. 75 % of the population aged 20-64 should be employed.
2. 3% of the EU's GDP should be invested in R&D.
3. The "20/20/20" climate/energy targets should be met (including an increase to 30% of emissions reduction if the conditions are right).
4. The share of early school leavers should be under 10% and at least 40% of the younger generation should have a tertiary degree.
5. 20 million less people should be at risk of poverty.

Furthermore, E2020 sets the following flagship initiatives against which the evaluation examines the contribution of the OP's specific objectives.

1. "Innovation Union" to improve framework conditions and access to finance for research and innovation so as to ensure that innovative ideas can be turned into products and services that create growth and jobs.
2. "Youth on the move" to enhance the performance of education systems and to facilitate the entry of young people to the labor market.
3. "A digital agenda for Europe" to speed up the roll-out of high-speed internet and reap the benefits of a digital single market for households and firms.
4. "Resource efficient Europe" to help decouple economic growth from the use of resources, support the shift towards a low carbon economy, increase the use of

renewable energy sources, modernize our transport sector and promote energy efficiency.

5. "An industrial policy for the globalization era" to improve the business environment, notably for SMEs, and to support the development of a strong and sustainable industrial base able to compete globally.
6. "An agenda for new skills and jobs" to modernize labor markets and empower people by developing their skills throughout the lifecycle with a view to increase labor participation and better match labor supply and demand, including through labor mobility.
7. "European platform against poverty" to ensure social and territorial cohesion such that the benefits of growth and jobs are widely shared and people experiencing poverty and social exclusion are enabled to live in dignity and take an active part in society.

4.3 Contribution to Common Strategic Framework

The Common Strategic Framework (CSF) established by the General Regulation 1303/2013 of the EU aims to promote the balanced and sustainable development of the Union. The CSF adopts strategic guidelines to facilitate the process of programming, and sector and spatial coordination of the activities of the Union.

The CSF outlines six horizontal principles – policy targets which will be used in the evaluation of the contribution of the OP towards the CFS strategy and concern the following:

1. Partnership and multilevel governance
2. Sustainable growth
3. Promotion of equality between men and women and non-discrimination.
4. Accessibility
5. Tackling demographic change
6. Climate change mitigation and adaptation

Table 7: Contribution and cohesion to E2020 Objectives

		75 % of the population aged 20-64 should be employed.	3% of the EU's GDP should be invested in R&D.	The "20/20/20" climate/energy targets should be met (including an increase to 30% of emissions reduction if the conditions are right).	The share of early school leavers should be under 10% and at least 40% of the younger generation should have a tertiary degree.	20 million less people should be at risk of poverty.
PA 1 / TO 3	SO 1.3a.1 Improve support systems tailored for start-ups and existing SMEs, focused on cross-border cooperation	2	2	0	0	1
	SO 1.3d.1 Expand cross-border economic activity, innovation and exchanges	2	2	0	0	1
PA 2 / TO 5 and TO 6	SO 2.5b.1 Reduce impacts from disasters	0	0	1	0	0
	SO 2.6c.1 Valorize CB area cultural and natural heritage	0	0	1	0	0
	SO 2.6d.1 Enhance the effectiveness of biodiversity protection activities	0	0	1	0	0
	SO 2.6f.1 Enhance water and soil management	0	0	1	0	0
PA 3 / TO 7	SO 3.7b.1 Improve accessibility of the CB area	0	0	2	0	0
	SO 3.7c.1 Improve transportation environmental impact	0	0	3	0	0
PA 4 / TO 9	SO 4.9a.1 Improve access to high-quality health services in the CB area	0	0	0	0	0
	SO 4.9a.2 Increase the capacity of social enterprises in the CB area	0	0	0	2	2

Table 8: Contribution and cohesion to E2020 Flagship Initiatives

		"Innovation Union"	"Youth on the move"	"A digital agenda for Europe"	"Resource efficient Europe"	"An industrial policy for the globalization era"	"An agenda for new skills and jobs"	"European platform against poverty"
PA 1 / TO 3	SO 1.3a.1 Improve support systems tailored for start-ups and existing SMEs, focused on cross-border cooperation	1	0	1	0	3	0	0
	SO 1.3d.1 Expand cross-border economic activity, innovation and exchanges	3	0	2	0	3	1	0
PA 2 / TO 5 and TO 6	SO 2.5b.1 Reduce impacts from disasters	0	0	0	1	0	0	0
	SO 2.6c.1 Valorise CB area cultural and natural heritage	0	0	0	2	0	0	0
	SO 2.6d.1 Enhance the effectiveness of biodiversity protection activities	0	0	0	2	0	0	0
	SO 2.6f.1 Enhance water and soil management	0	0	0	2	0	0	0
PA 3 / TO 7	SO 3.7b.1 Improve accessibility of the CB area	0	0	0	3	0	0	0
	SO 3.7c.1 Improve transportation environmental impact	0	0	0	3	0	0	0
PA 4 / TO 9	SO 4.9a.1 Improve access to high-quality health services in the CB area	0	0	0	0	0	0	1
	SO 4.9a.2 Increase the capacity of social enterprises in the CB area	0	0	0	0	0	2	2

Table 9: Contribution and cohesion to CSF Objectives

		Partnership and multilevel governance	Sustainable growth	Promotion of equality between men and women and non-discrimination.	Accessibility	Tackling demographic change	Climate change mitigation and adaptation
PA 1 / TO 3	SO 1.3a.1 Improve support systems tailored for start-ups and existing SMEs, focused on cross-border cooperation	0	2	0	0	0	0
	SO 1.3d.1 Expand cross-border economic activity, innovation and exchanges	0	2	0	0	0	0
PA 2 / TO 5 and TO 6	SO 2.5b.1 Reduce impacts from disasters	0	0	0	0	0	2
	SO 2.6c.1 Valorise CB area cultural and natural heritage	0	2	0	0	0	2
	SO 2.6d.1 Enhance the effectiveness of biodiversity protection activities	0	2	0	0	0	2
	SO 2.6f.1 Enhance water and soil management	0	2	0	0	0	2
PA 3 / TO 7	SO 3.7b.1 Improve accessibility of the CB area	0	1	0	3	0	0
	SO 3.7c.1 Improve transportation environmental impact	0	3	0	0	0	2
PA 4 / TO 9	SO 4.9a.1 Improve access to high-quality health services in the CB area	0	0	0	0	1	0
	SO 4.9a.2 Increase the capacity of social enterprises in the CB area	0	0	0	0	1	0

In general it is estimated that the majority of the OP's specific objectives through their achievement will contribute significantly towards all the objectives and initiatives of both E2020 and CSF. The only not so strong contribution is observed for the specific objectives of PA 4 that display only weak contribution towards CSF and for SO 4.9a.1 (access to health services) which has no contribution to the objectives of E2020 and very weak towards the initiatives of E2020. To conclude, it is estimated that the Programme's strategy and set specific objectives contribute significantly towards both E2020 and the CSF and this results in a high degree of compatibility and coherence between this OP and E2020 and CSF.

5. Evaluation of the administrative capacity, adequacy of human resources and the suitability of procedures to monitor, manage and evaluate the OP

The OP does provide a detailed account concerning the management and control arrangements that will be implemented for the implementation and monitoring of the OP. The main structure comprises of the managing authority (MA hereafter), the joint monitoring committee (JMC) and the Joint Secretariat (JS) that has the role of supporting and assisting the MA and JMC. The JS will be located near the MA offices which will enhance its effectiveness. Furthermore, it will be staffed based on the decisions of both countries. The organizational structure of MA, JMC and JS does appear to provide a sound basis for an adequate administrative capacity that will ensure proper and successful implementation and monitoring of the OP. The adequacy of the human resources however cannot be evaluated since there are no specific quantitative data available that could help in such an evaluation (for example how many people will constitute the JMC, the JS, what is the potential organizational chart etc.).

The procedures that are presented in detail and that concern aspects for monitoring, implementing and controlling the OP appear to be well designed. In particular, the data collection system, which is essential for monitoring purposes, will record and store in computerized form data on each operation under the OP necessary for monitoring, evaluation, financial management, verification and audit, including data on individual participants in operations, where applicable. Furthermore, the MA will ensure that the data is collected, entered and stored in the system and that data on indicators will be broken down by gender. Data and information availability that will help the implementation and monitoring of the OP will be enhanced through the provision and usage of a single website providing information on, and access to, all operational Programmes in the participating Member States, including information about the timing of implementation of programming and any related public consultation processes. An Information Office shall be set up in Bulgaria which will enhance the implementation of the OP through providing support to beneficiaries from the Bulgarian side during the preparation of proposals and throughout the period of implementation of operations. A Joint Steering Committee (JSC) shall be set up having the exclusive responsibility for selecting the operations to be funded under the OP.

The OP does adequately outline the procedures that will be followed in order to have the necessary data for monitoring and evaluation with references to annual reviews, on-going and ex-post evaluations.

Finally the OP does present successfully the steps that it will take in order to reduce the administrative burden that could put obstacles to the OP's implementation. This will be done through the use of: streamlining and harmonization of implementation tools; E-cohesion tool; simplification of procedures and programme rules; and lean management throughout all implementation processes.

To conclude, it is considered that the OP will have an adequate system for monitoring, implementing and evaluating the implementation of the programme through the procedures and structures that are described in the programming document.

6. Evaluation of measures taken for the promotion of equal opportunities between men and women and the prevention of discrimination

6.1 Equality between men and women

In the OP GR-BG there is adequate reference to equality between men and women aspects, this cross-cutting theme (of equality) emerges from projects under the specific objectives in PAs 1 and 4. However, under the specific objectives of the OP, it is expected certain focus to be given on the promotion of female entrepreneurship and support opportunities for women in order gender equality to be strengthened. It is very important during the implementation but also at the end of the project the aspects which contributed to this horizontal principle to be reported.

6.2 Equal opportunities and non-discrimination

It is quite clear that the OP pays specific attention to equal opportunities and non-discrimination. Specifically in the IP 9, actions for health and social infrastructures, regional and local development, social inclusion, vulnerable population groups (disabled, poor etc) and population groups exhibiting high incidence of health problems and high CB mobility (Roma, transients, illegal immigrants etc) are supported.

In IP 7b is focused on the improvement of the CB area accessibility. The infrastructure and construction works supported by the programme would address poverty or social exclusion problems in specific regions and special populations within the CB area. They will also contribute to the improvement of the quality of life of residents in full compliance with the principles of non-discrimination, regardless the gender, race, ethnic origin, religion or belief, age and sexual orientation.

Actions of spatial and environmental character (PA 2) seem also to address problems caused by natural disasters which affect equal opportunities in specific areas. The OP seems to take into account these problems and suggest several actions in order these problematic areas to become safer and more competitive, providing their residents multiple opportunities.

7. Evaluation of measures taken for the promotion of sustainable development

The OP takes into account the horizontal principle of sustainable development in the development of the Programme’s strategy as well as in the process of goal setting and the development of the specific objectives and the respective actions. The vast majority of the actions suggested promote economic development, social cohesion and environmental protection of the CB area, [basic principles of sustainable development](#). Specifically, the OP

promotes the efficient use of resources, public participation in decision making, access to information, integrated decision-making and planning, waste minimization and substitution, as well as research and innovation actions.

In conclusion, the OP seems to be adequate regarding the promotion of equal opportunities, equality between men and women, the prevention of discrimination and the promotion of sustainable development.