

Management challenges in Cohesion policy of the European Union realization in the next Programming Period (2014-2020)

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Abstract This paper is focus on the analysis of the possibilities for straightening administrative capacity of the National Management system of the European Union Funds in Bulgaria in order to prepare of the new programming period. This analysis includes legislatives, political as well as managerial factors for the relevant functioning of the system. The author gives proposals for reducing bad practice on the process of management of EU funds.

Keywords: EU funds, cohesion policy of EU, Bulgaria absorption of EU funds.

I. INTRODUCTION

The present 2013 is the last year of the Bulgaria first programming period (2007-2013 г.) as a member-state of the European Union. This is convenient time for serious analysis and based on that analysis conclusions in order to help administration and responsible persons to prepare correctly the next programming period.

During this period Bulgaria had for the first time possibility to manage European Structural and Cohesion funds. This seven years experience shows various managerial successes, but also bad practice in the National Management System of the European Funds (NMSEF). Correct programming of the next period includes definition of the weaknesses through the careful and unprejudiced study, determination of the appropriate corrective activities and their approbation in the NMSEF. This problem became more and more actual not only with the coming of the new programming period, but also with a view of the new principles and procedures for the management of the EU funds and programmes.

In the next programming period, in order to increase the effectiveness and efficiency on the process of absorption of resources, EU will impose consolidated legislative regulation for all funds – Structural and Cohesion Funds, but also and for the European fisheries and maritime fund and European fund for rural development.

This is the very clear sign towards also to the Republic of Bulgaria for the necessity of the managerial actions for straightening NMSEF in order to increase the National project capacity¹.

In this paper the author generalizes his researches, made in this programming period, participating in the different levels in implementation of various projects and contracts under operational programmes, financed by EU. The Analysis is made through the factors that influenced on the straightening of the administrative capacity of NMSEF.

II. BULGARIAN POLITICAL PROCESS IMPACT ON THE FUNCIONING PF THE NATIONAL MANAGEMENT SYSTEM OF THE EUROPEAN FUNDS

During its first programming period 2007-2013, Bulgaria has chanced 4 governments – the coalition between Bulgarian Socialist Party (BSP), The Movement for Rights and Freedom (MRF) and NMSS begins this period, after that was the government of the Citizens for the Bulgarian European Development (CBED), followed by the caretaker government with the Prime Minister Marin Raykov.

At this moment we have expert government, politically supported by BSP and MRF. Having minded the fact that the management body of the operational programmes are within concrete ministries, each cabinet change is reflected directly to this administration.

During the period of the coalition between BSP, MRF and NMSS there was Deputy Prime Minister – Mrs. Meglena Plugchieva, who was responsible for the management and implementation of the European funds in Bulgaria. In the cabinet “Borisov” there weren’t at first concrete minister with the EU funds obligations. But later, in 2010, was nominate Mr. Tomislav Donchev.

¹ Thus refers to the capacity of the Republic of Bulgaria for efficient and effective absorption resources from EU Funds and Programmes. For further information, please see Anguelov, K. Challenges for effective and efficient management of the Structural and Cohesion funds in the present programming period (2007-2013) KSI Transactions on Knowledge society, Jan I, Volumes 2, June 2008

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The government of CBED has undertaken other changes in the administration, which is a part from the institutional system for EU funds management in Bulgaria.

The first and more important was the fact that with closing of the Ministry of the Public Administration and the Administrative Reform, the Managing Authority of the Operational Programme “Administrative Capacity” (OPAC) that was exactly at the structure in this Ministry, after the process of heavy administrative procedures, was moved in the Ministry of Finance. The result of this change reflects to all beneficiaries of OPAC.

The other change was again administrative and was focus on the National Coordination Unit (NCU). During the former government this Unit was within the Ministry of Finance, but was moved as directorates in the Council of Ministers Administration. Together with the NCU in the government administration was moved and the Managing Authority of the Operational Programme “Technical Assistance”. Even the fact that this OP has as beneficiaries other administrations, the change was difficult.

During the caretaker government of the Marin Raykov, we had a Deputy Prime Minister, responsible for the implementation and management of the EU funds – Mrs. Iliana Tsanova.

At the present cabinet there is again concrete Deputy Prime Minister with the responsible of EU funds in Bulgaria – this is Mrs. Zinaida Zlatanova. She has, however as the Minister another responsible filed – for the Ministry of Justice.

This cursory glance at the chronology shows in reality the lack of political dialog and agreement between political party in the Parliament as regards to the institutional framework for implementation and management of EU funds in our country. Each change in fact leads to the shaking in the system that reflects its whole effectiveness.

Brussels has criticized Bulgaria more than once because of permanent lack of qualified administrative capacity². European Commission insists thus type of administration have to be unaffected from the government changes. Regardless of this, namely the lack of political agreement on the strategic management structure is one of the main factors for the insufficient results for Bulgaria in implementation and management of the operational programmes during this programming period.

The necessity of efficient national coordination between all operational programmes is also obvious. If we compare the our experience up to now, we can find out that only for the two very short period of time, where the coordination and from there – the absorption of the funds were decreased, Brussels gave us an “advice” to nominate minister with responsibilities on the EU funds in Bulgaria. The role of this minister is not only to coordinate the whole processes in the NMSEF, but also

to keep directly partner and relationship with the European Commission. More over – from the position of this minister within the institutional hierarchy we can define the adequacy of the management reaction on the national level in the risk situations. For instance – decision making process on the national level in case of treat that concrete operational programme is going to loose financial resources or the possibilities to adopt new legislative documents in order to improve legislative framework for EU funds project implementation.

It is really important to underline that the good examples for EU funds management are from countries, which have strong coordination, based on the understanding that this policy (EU absorption funds) is a high priority on the national level. Such examples are Latvia, Hungary and others that exceed us in relation to the percentage of absorption level from EU funds and programmes.

On the opposite place is Romania, which has even more weak developed system that Bulgaria for national coordination and as a result of this – the country goes to the last position when we compare absorption of EU funds (according to data from September 2013).

In conditions of insufficient coordination of the management and control processes of the EU funds and programmes, it is really possible to exist in practice administrative units with double functions. As an example in this we can point out the recovering of the functions between Directorate European Union Funds Management in the Ministry of Finance and the Cabinet of the Deputy Prime Minister responsible for EU funds Management – Mrs. Meglena Plugcheva (2008-2009) [4].

On this regard, the proposal of Mr. Tomislav Donchev, former Bulgarian Minister for EU funds management in Bulgaria, for establishment a New Agency, which includes at one place all Managing Authorities of all operational programmes, together with the National Coordination Unit, demands deep analysis and serious rationalization. This proposal was outcast by the other ministers from “Borisov” Cabinet even without discussion of the argument “yes” or “no”. In fact this idea (which is based on the example of Hungary), could have a huge potential only in case that this new structure will never be subject to the political nominations as well as political castles. According to the Author of this publication, the political class in Bulgaria is not yet ready to challenge this idea.

As a matter of fact, every time when the revolutionary approach was imposed by force over the system evolution, thus was lead to the negatives from the management level. Reasons are many through that the constant elaboration is more appropriate that the constant fundamental changes:

1. The EU funds and programmes management is executed according to the strict observation on the European legislation. The regulations, that have to be respected, demand specific knowledge and experience. Each contravention from this regulations leads to the

² Thus refers to the National Project Capacity

financial sanctions for the incorrect level.

2. Management of EU funds is executed in conditions of the strong institutional control from different administrations of the European Union. Thus reflects not only to the more strict control from our national authorities³, but also to the obligation to use sanctions in case of irregularity.

It is no by chance that, according to the management of EU funds regulation; there is no risk from damage for the financial interests of the European Union.

3. The control of EU funds and programmes management is not only with high intensity, but this intensity is keeping as a constant quantity during one very long period of time. For this programming period, the most distant date, when each beneficiary can be put under audit from the Bulgarian or European Union audit authorities is the 31 of May 2021 [1]. At the request of the European Commission, this time can be prolonged.

4. The powerful and negative international reverberation in situation of revealing from OLAF (European Anti-Fraud Office) or from other competent national institution from the member-states cases in frauds, corruptions or misconducts with EU resources.

To inconsiderable degree the effectiveness and the efficiency of the NMSEF are determined by the level of defense to the irregularities and especially – to the frauds. The OLAF investigation “Nikolov – Stoykov” is a basic example in this regards. This case has to be so called “study case” about clear comparison between competent authorities’ reaction in Germany and Bulgaria. We have to underline, that this case refers to the funding from the pre-accession fund SAPARD programme, which management was executed in situation of low administrative capacity. In this programming period due to the effective actions of NMSEF we have no such scandal with international resonance.

5. Drastic and permanent breaking the European Regulation can reflect to the withdraw accreditation of concrete body for management or control EU funding in the member states. Such sanction for the operational programmes Bulgaria has not yet undergone, in contrast to the other member-states. Withdrawing accreditation leads to the real freezing of EU funding for concrete operational programme.

6. These arguments show not only the fact that simplification of the rules and procedures for EU management is not the function from the political decision on the national level, but also that their ignorance will bring the negative consequences for all levels: beneficiary, Intermediate Body, Managing Authority, National coordination system etc. The right and correct approach is not our constant, connected to

the national mentality aspiration to avoid legislative rules, but in establishment of sustainable national capacity through straightening the principle of evaluation for NMSEF.

7. Management of the EU investment funds requires even more efforts. According to the project specific, they are implementing in long period of time. It is really possible to happen that the pre-project activities can be implemented in one programming period, but the real investment project – i.e. the construction phase – in another. Dramatic system change only delay implementation project and increase risk for losing contracted funding.

8. Principle for process of programming of EU funds and programmes supposes strategic vision. Once this vision is approved, we have only to initiate corrective actions to improve NMSEF. The abrupt changes can lead to the losing of EU funds (and because of the rule N+3/N+2). The perpetrator of this financial correction is hardly to be found.

9. Management of EU funds directly reflects to the different aspects of the National security [3]. All decisions, connected to the national security, have to be developed in conditions of deep analysis, which doesn’t include precipitate actions, based only on the current political situation.

Non-adherence to the evolution principle in the development process of NMSEF has numerous negative aspects that influence administrative capacity:

1. Permanent variation of the national legislation as well as procedures manual of the operational programmes results to the serious difficulties from the part of the beneficiaries and – respectively – to the higher risk for irregularities and lost funding. Lack of coordination in the system is different requirements that beneficiary who implements projects under different operational programmes, have to fulfill. That is once again obstacle in front of beneficiaries. When these beneficiaries are business organizations, this principle is against the Act Restricting Administrative Regulation and Administrative Control over Economic activity because it creates an unnecessary burden. This question requires detail analysis in different research and will be partially discussed in the next section of the present paper.

2. Loss of coordination between beneficiaries – Intermediate Body – Management Authority – Central Coordination Unit. Lack of coordination affects mostly programmes, financed by EU funds, due to the clear concrete periods for financial implementation to achieve indicators. The best answer to this challenge for Bulgaria, according to the author, is to develop Central Coordination Unit to the functions that have the analogue administrative structure in Hungary.

3. Very strong influence on the administrative capacity has human resources, based on the principle of nepotism. The ignorance of the professional approach in the process of career development of employees in NMSEF is a result to the underestimation of the responsibilities

³ For further information see Anguelov, Kiril, The Effective organization and management of processes for implementation, execution and control in spending resources from Structural and Cohesion EU Funds, Institute for Public Administration, S, 2011, ISBN 978-954-91217-9-7



they bear in relation to their duties.

Rules and control from the EU structures require specific skills, qualification and experience that cannot be found the exact analogue with other administrative positions. It is not an exaggeration to say that employees from public administration that implement projects or have function in manage and control of EU funds project and programmes, must have specific experience and qualification over the requirements to the rest of administration. Administrative practice in Bulgaria may show a number of examples of non-compliance with this principle.

In this regard the emblematic example is the case with the Executive Director of the State Fund Agriculture, which is the Paying Authority of the programme with the largest budget in this programming period. This Executive Director was subsequently convicted of a crime for counterfeit diploma for high university degree. In fact, the real political responsibility for the appointment of that person was not sustained. In an analogical way, there are many appointments made in different administration levels, without regard to the professional approach – at municipalities, Intermediate Bodies as well as Managing Authorities. Based on a survey carried out by the author among the most influential factors on the implementation projects from municipalities – beneficiaries of the Operational Programme "Environment" is the frequent change of experts in administration (many times this change is a results from the change of Mayor).

Regardless if it is refers to putting at risk more than 1 billion euro (in case of appointment the Head of Paying Authority without the needed level of education, qualification and experience) or more than 1 million euro (for projects funded under Operational Programme "Environment" or "only" a thousand euro in the implementation of so called "small projects"), the problem can be solved with the respect of the principle for professional approach without any forms of nepotism. With regards to all said it is neither yearly nor late to:

- to develop new positions in the Classification of the positions in administration with important positions (occupied according to the Civil Service Act) for employees that have responsibilities in the implementation, management and control processes of EU funds and programmes;

- increase requirements for these positions – the degree of education, but also for professional experience. It is totally unserious for person with bachelor degree in education to be assigned such type of activities;

- required professional experience for the concrete position has to be related to the activities in organization and management of processes in implementation, control and spending of EU funds.

III. SUSTAINABILITY OF THE NATIONAL LEGISLATIVE FRAMEWORK IN THE FIELD OF

IMPLEMENTATION AND MANAGEMENT EU FUNDS IN BULGARIA

If one system has to be successful and working, it must be based on the stable, predictable and to some extent – even conservative legislation. Because of the fact that one change in the legislation affects functional administration, but also affects both potential and current beneficiaries, we believe that sustainability of documents, which regularize the procedures for obtaining grants, as well as legislation for selection of contractor, should be very well discussed and considered, even before their enter into force. The author also thinks that chaotic change of an act already into force leads to unavoidable problems of all levels of the system – from beneficiaries and Managing Authorities, to Audit Institutions.

For the purposes of this paper we will look only at the main documents that are in the base of the real implementation of the operational programmes. The data for the sustainability of the main legislative framework that concerns implementation process of projects, financed by the operational programmes in Bulgaria indicate the following:

- Council of Ministers Decree 121 from 31.05.2007 laying down the procedure for grant under the operational programmes, co-financed by the Structural and Cohesion funds of the European Union. This Decree is fundamental and concerns to all Managing Authorities of all operational programmes. For a period that is less than seven years, the document has been amended 16 times.

- Council of Ministers Decree 69 from 11.03.2013 laying down the procedures for contractor selection of beneficiaries of contracted grants from Structural and Cohesion Funds of the European Union, Joint Operational Programme "Black sea basin 2007-2013", the Financial Mechanism of the European Economic Area and the Norwegian Financial Mechanism. In fact, under this Decree work the majority of the beneficiaries – business and non-governmental organizations – i.e. all beneficiaries, those not come under the Public Procurement Law. The document repeals Council of Ministers Decree 55 from 2007. However, the fact is enough demonstrative, that the same year of adoption, the document has already undergone two changes.

- Public Procurement Law – whose scope covers beneficiaries that implement projects with the large financial resources – these are mainly municipalities, administrative structures as well as entities of the justice system. Only within the last 7 years period (we discuss only the programming period 2007-2013) has been changed 17 times. The latest change of the Law will come into force in January 2014. We have to underline that these very often changes in this law create a sense of political conjuncture – we can identify examples of changes that essentially restore revoked or amended articles and paragraphs.

These are three of many regulations from the

legislative framework that are obligatory for the beneficiaries in the process of project implementation. Management and control of a multi-years project requires compliance with current and actual situation of the legislative and administrative documents. This is a profitable factor for admission of irregularities. We should not be irrelevant to the fact, that each of these changes has to be immediately reflected in the corresponding Procedure Manual of the Operational programme.

Those obtained quantitative accumulations could be interpreted in two main directions:

- First, on one hand is the ambition of the administration to respond in time to the changing environment, but on the other as
- Risk for sustainability and proper development and functioning of the overall system for Management of EU funds.

However, this frequent change in legislation reflects in a very negative way to the beneficiaries implementing projects, financed by European funds. They must nominate at least one employee who has the responsibility to monitor the changes and to inform the manager. In most cases, such an employee in period of global economic crisis it is not impossible to justify the expenditures. In this sense, we should not be seen as surprising the fact that the majority of beneficiaries identified as a main obstacle on the phase of project implementation the administrative burden as well as the frequent change of rules.

The author considers only the basic documents in project implementation, but in any case we should not be ignored the Council of Ministers Decree laying down concrete specific eligibility costs for each operational programme, as well as procedures for programme implementation and management of each Managing Authority. When we combine those documents, which are also repeatedly amended and supplemented through this seven years period of time, we can imagine the enormous uncertainty that was set on the national legislation level.

Having in mind that this is the first programming period for Bulgaria, we can somehow explain this frequent change in the basic documents. However, our country has enough seven years of experience in implementation and management of these programmes and responsible institutions should take it into account in

process of creation the specific condition in the new programming period.

On the other hand, when the changes made into system that are directly correspond to the implementation and management of the programmes financed by European funds, they have to be a subject for a wide public discussion. Key role of this public debate should be given to the professional organizations that know the specific of the concrete branch of the industry, the current practice, the need of business etc. At the same time – the authorities should provide enough and sufficient time that allow all interested groups of the society to learn about upcoming changes before the moment when the documents will be enter into force. Otherwise the risk of incorrect implementation of project of correct beneficiaries exists and the administration will be the only perpetrator of this.

Last, but not least – we have often conflicting interpretation of the same legislative act from different administrative structures [4]. Thus is another burden in front of the beneficiary and is a real precondition for admission of irregularities.

IV. IMPLEMENTATION STATUS OF THE OPERATIONAL PROGRAMMES

For the success or failure of any system we can judge by the results it gives. Data from the Public module of the Information System for Management and Monitoring of EU funds are summarized in Table 1.

Data reveals that the Managing Authorities of the operational programmes are succeeded to contract over 90% of their budget. The exception of this generalization is only the Operational programme “Development of the competitiveness of the Bulgarian Economy” and Operational programme “Administrative Capacity”. Good impressions make the efforts of the Managing Authorities of the two largest infrastructure programmes – “Transport” and “Environment”. They have so called overcontracting (OP “Environment” has even 50 percentage points higher that 100 percent) in order to achieve effective implementation of the total budget of the programme.



Table 1. Operational Programme Implementation as of 30.09.2013. Data are in Euro [9].

OPERATIONAL PROGRAMME	BUDGET	Contracted		Payments	
		Total	% implementation	Total	% implementation
Transport	2 003 481 166	2 016 135 282	100.63	1 032 115 677	51.52
Environment	1 800 748 085	2 732 980 538	151.77	593 681 231	32.97
Regional Development	1 601 274 759	1 568 174 744	97.93	802 464 384	50.11
Competitiveness	1 162 215 552	997 800 067	85.85	626 306 596	53.89
Technical Assistance	58 819 427	54 790 764	96.43	26 500 932	46.64
Human Resource Development	1 213 869 575	1 180 959 426	97.29	645 224 262	53.15
Administrative capacity	180 789 087	161 342 088	89.24	92 131 301	50.91

According to the indicator Contracted funds, the Managing Authority of the Operational Programme “Development of the Competitiveness of the Bulgarian Economy” is on the bottom of the ranking. This programme is one of the few that have structural changes on the management body. OP “Competitiveness” started this programming period and operates long time with an Intermediate Body. The Intermediate Body was within the Executive Agency for Promotion of Small and Medium –Sized Enterprises. The Intermediate Body acts also as a Contracting Authority. It has responsibilities for the first and second priority axes of the programme (those that are grants directly for business). Since the ultimate responsibility for the implementation and management of any operational programme lies with the Managing authority directly to Brussels, the Managing Authority of OP “Competitiveness” brings further control and monitoring over the work of its Intermediate Body. Thus led to a real inefficiency and ineffectiveness of the programme implementation. As a result of this – OP “Competitiveness” has no longer Intermediate Body, but the delay of implementation is hardly to be overcome. The experts from Intermediate Body went into the structure of Managing Authority. Despite this change, the Managing Authority of “Competitiveness” continues to work hardly and with difficulties in communication with its potential or current beneficiaries.

An obvious example of this is the planned in the Indicative Annual Working Programme of the OP “Competitiveness” (for 2013) procedure for technological modernization of the Bulgarian enterprises. This procedure, according to the Indicative programme, had to be launched in the first quarter of 2013. Until the end of September, this procedure has not yet been announced.

The data for OP “Competitiveness” from the table – we have to mention that they are received due to the so called instrument for financial engineering “Jeremy”. In the next programming period this is the programme that needs to be given the most attention in terms of management and establishment of effective control systems.

Operational programme “Environment” is the last according to the indicator “percentage of

implementation” of real payments – only 32.97%. This value at the end of the last year of the programme must be as an alarm. The Managing Authority should seek for an alternatives ways to accelerate the real payments under the programme. The obvious reason for the delay is based on the specific of projects – “major” and heavy infrastructure projects, with beneficiaries – local authorities. Municipalities must select contractor for the project activities following the Public Procurement Law.

Sometimes such procedure can take more than a year (preparation of all documentation for procedure, ex-ante control, fixed time in the Law, eventual appeal against decision etc...). According to the author’s research, mentioned above, the conclusion shows that municipalities have low administrative capacity as well as experience in project implementation, funded by European Union. On the other hand, these municipalities have, for instance, contracting project for 1 billion euro. The author’s recommendations for straightening the capacity is namely for such cases.

V. NEW PROGRAMMING PERIOD

Bulgaria, as a member-state of the European Union, works on its preparation for the new programming period 2014-2020. Our country plans to implement seven operational programmes:

- Operational programme “Transport and Transport Infrastructure”;
- Operational programme for Environment;
- Operational programme “Regions in growth”;
- Operational programme „Innovations and Competitiveness“;
- Operational programme “Human Resource Development”;
- Operational programme “Science and Education to smart growth”;
- Operational programme “Good Governance”.

The programming process of the above programmes must be very accurate and reflect the actual needs for the development of concrete economic areas. Bulgaria, of course, can not get out of the implementation of the European policies, set out in the strategy “Europe 2020”. The concrete ways to implement this policy depend on

the correct rules and procedures on the Member State level.

Bulgaria should use this accumulated seven years of experience in implementation and management of the EU funds. Frequent changes of regulations, structural changes and excessive controls are considered as fundamental barriers to achieving a high rate of investments from EU funds.

Administration (if has so called “institutional memory”) should accept the responsibility to knit these lessons learned in establishment the system for the new programming period.

VI. CONCLUSION

In this paper the author makes an analysis on the main problem areas, related to the effective and efficient functioning of the National Management System of European Funds. The basic factors are identified, connected to the development of the capacity of the system to do organization and management of the processes of implementation, control and spending of EU funds. The analysis and proposals are in compliance with the requirement of the new programming period 2014-2020.

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