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| Mid-term evaluation of the Internal Security Fund 2021-2027 of the Republic of Bulgaria  Report |
| PMG Analytics Ltd. |
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# Abbreviations

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| AMOI | Academy of the Ministry of Interior |
| AMFEFSM | Act on management of the financing from European funds under shared management |
| VIS | Visa Information System |
| DGBP | Directorate General "Border Police" |
| GDCOC | General Directorate for Combating Organised Crime |
| IPD | International Projects Directorate |
| DCIS | Directorate Communication and Information Systems |
| MD | Migration Directorate |
| PTP | Pre-trial proceedings |
| SAR | State Agency for Refugees |
| PPA | Public Procurement Act |
| BMVI | The instrument for financial support for border management and visa policy for the period 2021-2027. |
| MOI | Ministry of the Interior |
| MFA | Ministry of Foreign Affairs |
| MMIS | Management and Monitoring Information System |
| SPO | Specialised police operations |
| SO | Specific objective |
| MCS | Management and control system |
| AMIF | Asylum and Migration Fund |
| ISF | Internal Security Fund |
| SIS | Schengen Information System |

# Executive summary

The European Internal Security Fund (ISF) is established by Regulation (EU) 2021/1149 for the period 2021-2027. Three specific objectives have been set: exchange of information (SO1); cross-border cooperation (SO2) and preventing and combatting crime (SO3). The available financial resources for the programme are €58,621,250, of which the Union financial contribution is €44,619,878 and the national contribution €14,001,372.

The purpose of this report is to provide a mid-term evaluation of the implementation of the Republic of Bulgaria's ISF programme in accordance with Article 44(5) of Regulation (EU) 2021/1060. The main objective of the mid-term evaluation is to ascertain that the regulatory framework and the Republic of Bulgaria's ISF programme is fit for purpose and will provide a contribution to the achievement of the envisaged objectives at a reasonable cost; appropriate support to address changing needs and add value to the EU in line with other funding sources or modalities.

The present Mid-term Evaluation was carried out between February and March 2024. The data collection methodology included review of programming, procedural, and project documentation, as well as relevant legislation. Semi-structured in-depth interviews with 20 stakeholders were carried out, and an online survey amongst 21 officers from General Directorate Combatting Organised Crime was also conducted. The key methodological challenges included: (1) the short period to conduct the evaluation (20 calendar days), (2) the early stage of the Programme implementation and ongoing implementation activities while the evaluation was taking place, and (3) the absence of baseline assessment, as the ex-post evaluation of the ISF-Borders (2014-2020) had not started yet.

Despite some delays in the development and approval of the ISF programme, by the beginning of 2024 the progress in implementing the programme is satisfactory with two calls for grant applications to specific beneficiaries launched and 14 agreements concluded. By the end of 2023, 60% of the total budget of the Internal Security Fund programme or more than €32 million has been contracted. By the end of 2023, all 14 projects approved under the ISF programme are in their second month of implementation. The tendering procedures related to the implementation of the projects are under preparation. For this reason, at the end of 2023, there are still no expenditure declared under the programme.

A Monitoring Committee of the programmes was formed in January 2023. Compared to the previous programming period, the membership of the Monitoring Committee has been extended.1 Alongside stakeholders in the internal security sector, the Monitoring Committee includes representatives of the social and economic partners (trade unions and employers' organisations), representatives of regional and local authorities, organisations of disadvantaged people, academia, and NGOs. Responsibilities of the Monitoring Committee include activities related to the implementation of the programme (methodology and criteria for selection of operations; agreement on indicative annual work programmes, approval of the evaluation plan) and monitoring of the programme (examines the implementation and monitors progress in the implementation of the programme, examines information on the conclusions and recommendations of the annual monitoring reports).

The period 2019 - 2023, during which the planning of the ISF programme was taking place, as well as the launch of its implementation, has been characterised by dynamics at national and European level, both in terms of serious and organised crime, as well as in terms of policies to counter this crime. The following factors have a strong impact on the security situation in the country and the work of the competent authorities in the field of internal security and their needs: the COVID-19 pandemic, the war in Ukraine, the strong migratory pressure on the country.

In the context of a rapidly changing security environment, the programme responds to a large extent both to the real needs of the stakeholders identified in the programming period (2020-2021) and the needs identified at the present time - i.e. the end of 2023. The contracted interventions respond to the needs identified in the programme, and to the suggestions for priorities and measures made by stakeholders in the framework of the Thematic Working Group for the development of the ISF programme. The projects also provide a continuation of similar activities from the previous programming period. The specific objectives set out in the programme provide a high level of flexibility.

Due to the stage of implementation of the projects approved under the ISF programme, it is too early to assess how effective they are in terms of achieving the objectives and results. Although there are no specific indicator values reported yet, the expectations of the consulted stakeholders are that the final indicator targets will be achieved.

The management and control system is detailed and efficient. Both the Managing Authority and the beneficiaries consider that the overall indicators reflect the main achievements of the programme and are in line with the intervention logic of the ISF programme. The beneficiaries have also received sufficient guidance from the MA on the content and reporting of the indicators.

The Managing Authority shall implement measures to ensure compliance with the horizontal principles set out in the Common Provisions Regulation as well as in national legislation, including compliance with the EU Charter of Fundamental Rights in the implementation of the programme - Article 9(1). The application of the principles of equal opportunities, transparency and equal treatment shall be monitored by the Managing Authority at all stages of preparation, evaluation and implementation of operations selected for support*.*

The ISF programme is largely aligned with other EU funds, with some synergies with other programmes. Structures, organisational arrangements and coordination mechanisms are in place to ensure coordination, complementarity and, where appropriate, synergies between different management modes of the same programme.

Each of the interventions approved under the ISF programme contributes to the implementation of the priorities and measures set out in strategic documents at European level, such as the EU Strategy on Combating Organised Crime 2021-2025.

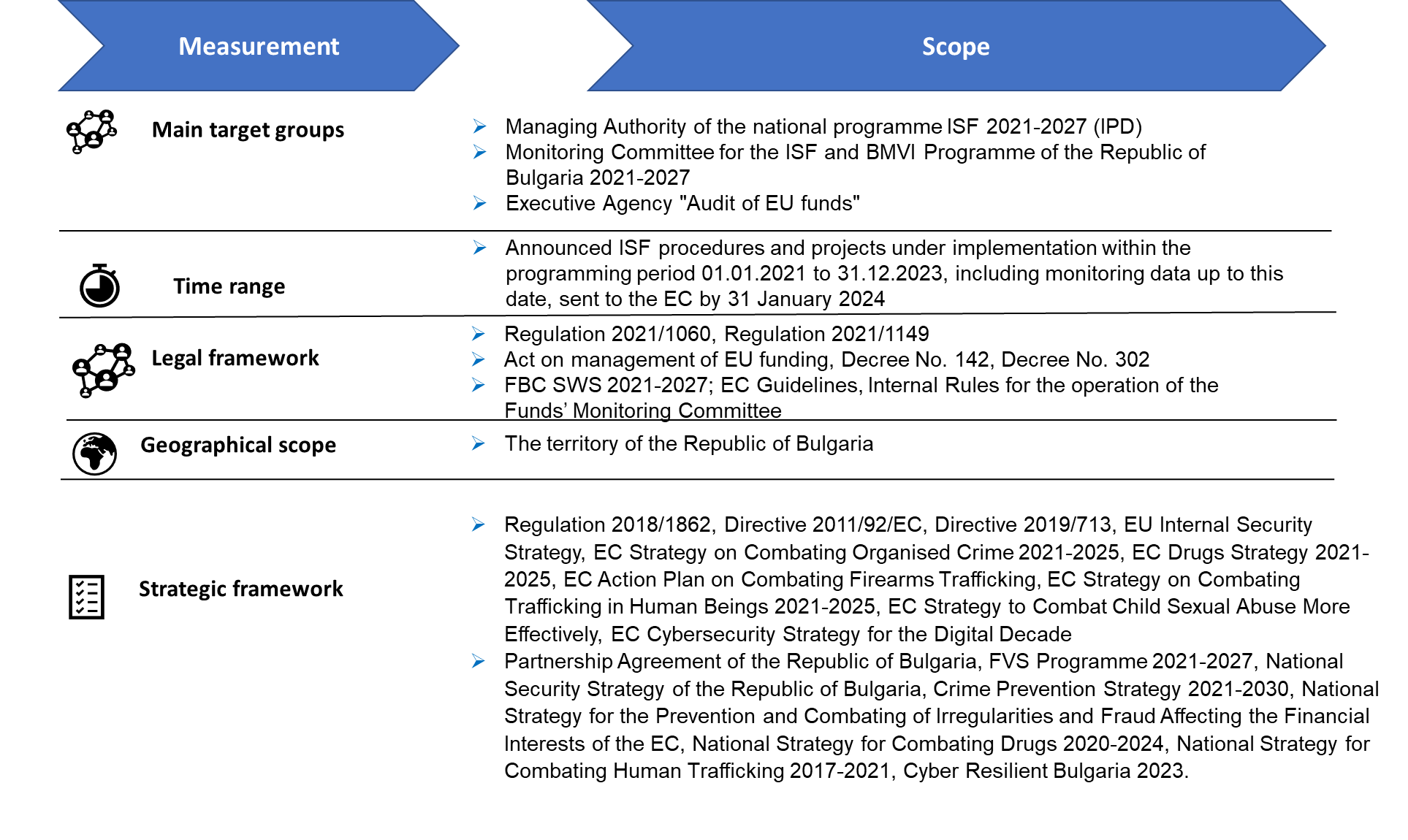
The key recommendations to beneficiaries and the MA include:

* Inclusion in the Programme of other areas of strategic priority, such as countering crime across the state border / investigating illegal migration and compensation measures.
* Developing capacities to implement cross-cutting principles (respect for human rights, respect for the interests of vulnerable groups, non-discrimination, decarbonization)
* Beneficiaries to consider further expansion of the communication channels and messages to reach the wider public, including wider use of social media;
* Use of good practices for simplification of administrative burden applied by MAs of other EU funds programmes under shared management

# Introduction

## Purpose of the evaluation

The purpose of this report is to provide an interim evaluation of the implementation of the programmes of the Republic of Bulgaria under the Internal Security Fund (ISF) 2021-2027. laying down common provisions on the European Regional Development Fund, the European Social Fund Plus, the Cohesion Fund, the Just Transition Fund and the European Maritime, Fisheries and Aquaculture Fund and the financial rules applicable to them and to the Asylum, Migration and Integration Fund, the Internal Security Fund and the Instrument for Financial Support for Border Management and Visa Policy.



The main objective of the mid-term evaluation is to ascertain that the regulatory framework and the approved programme under the Fund are fit for purpose and will provide a contribution to the objectives set at a reasonable cost; appropriate support to address changing needs; and EU added value in line with other funding sources or modalities. One of the objectives of the mid-term evaluation is to make recommendations on how to improve the quality of the content and implementation of the programmes under the three Funds.

With regard to the **ISF 2021-2027**, the mid-term evaluation will assess the contribution of the programme against the following specific objectives of the Fund:

* improving and facilitating the exchange of information between and within competent authorities and relevant Union bodies, offices and agencies and, where relevant, with third countries and international organisations;
* improving and intensifying cross-border cooperation, including joint operations, between competent authorities in relation to terrorism and serious and organised crime with a cross-border dimension; and
* supporting the strengthening of Member States’ capabilities in relation to preventing and combating crime, terrorism and radicalisation, as well as managing security-related incidents, risks and crises, including through increased cooperation between public authorities, relevant Union bodies, offices or agencies, civil society and private partners in different Member States.

The assessment of progress in the implementation of the specific objectives of the ISF 2021-2027 will also allow conclusions to be drawn on the extent to which the main objective of the Fund has been achieved, namely to contribute to ensuring a high level of security in the Union, in particular by preventing and combating terrorism and radicalisation, serious and organised crime, and cybercrime, by assisting and protecting victims of crime, as well as by preparing for, protecting against and effectively managing security-related incidents, risks and crises.

## Scope of the evaluation

The criteria used for the evaluation of the financial instrument are in line with the Better Regulation Guidelines[[1]](#footnote-2) , and include: relevance, effectiveness, efficiency, coherence/compliance and EU added value.

The thematic scope of the evaluation includes:

* progress towards achieving the milestones and targets of the implementation framework and the annual reports on the implementation of the country programmes of the three Funds;
* the effectiveness of the management and control system;
* the continued relevance and appropriateness of the implementation measures;
* coordination, coherence and complementarity between actions supported by the Funds and support provided by other Union financial instruments;
* efficiency of resources used to achieve objectives
* the Union added value of actions implemented under the Fund;
* the assessment of the actions performed with, in or in relation to third countries in Article 13(11) and (19) (FCA).

The evaluation will focus on procedural aspects, on the continued relevance of the tools and on ways to simplify or streamline implementation. Emphasis will be placed on identifying issues that may negatively affect programme implementation and finding solutions.

## Policy Context - Internal Security

The period 2019 - 2023, during which the planning of Bulgaria's ISF programme was taking place, as well as the launch of its implementation, has been characterised by dynamics at national and European level, both in terms of serious and organised crime, as well as in terms of policies to counter this crime. The following factors have a strong impact on the security situation in the country and the work of the competent authorities in the field of internal security and their needs: the COVID-19 pandemic, the war in Ukraine, the strong migratory pressure in the country.

In early 2020, the **spread of COVID-19** and the declaration of a state of emergency led to the introduction of a number of restrictive measures, a reduction in economic activity and an increased police presence in the country. As a result, both conventional and organised crime have declined. At the same time, some criminal activities have shifted to cyberspace, the spread of fake news and disinformation materials has increased, as have calls and incitements to destructive actions.[[2]](#footnote-3) Alongside this, organised crime groups have begun to adapt their activities, modify operations and create new markets in line with the current situation. In addition to the impact on organized crime, the COVID-19 pandemic has had an impact on the ability of state law enforcement to counter security threats. Police authorities have been tasked with additional activities related to enforcing anti-epidemic measures and minimizing opportunities to violate them; preventing the use of the emergency situation to commit various offences; monitoring the Internet space to limit the spread of fake news, speculation on the prices of medicines, protective equipment, etc.[[3]](#footnote-4)

At the beginning of 2022, the **war in Ukraine** began, which led to an increased refugee flow to Bulgaria and the relocation of some of the Ukrainian criminal contingent in the country, their assets and resources to participate in organised criminal activities.[[4]](#footnote-5) In addition, the organised crime groups already operating in Bulgaria are using this international uncertainty to expand the scope of their illegal activities or to reorient themselves towards criminal spheres generating higher financial income.[[5]](#footnote-6) With regard to trafficking in human beings, the risk of Ukrainian nationals present on our territory being drawn into active trafficking networks as both victims and perpetrators has increased.[[6]](#footnote-7) In the online space, the war in Ukraine has led both to a further increase in the dissemination of fake news and disinformation and to an increase in malicious traffic to official websites of state institutions.[[7]](#footnote-8)

After the gradual opening of the borders in 2021, there followed two years of **increasing pressure from illegal migration at the external borders** of both Bulgaria and the entire European Union. The year 2023 marked the year with the strongest migration pressure: over 178,200 cases of irregular crossings prevented at Bulgaria's green borders, mostly at the borders with Turkey[[8]](#footnote-9) . At the beginning of the migration crisis, a very large part of the criminal contingent was oriented towards facilitating the illegal crossing of migrants, but they have gradually returned to their traditional criminal businesses.[[9]](#footnote-10) Since the collapse of the Islamic State, there has been a movement away from the conflict zones towards Europe, and these movements have mixed with irregular migrant flows.[[10]](#footnote-11)

Other important trends related to serious and organized crime in the country are:

* Regarding the production of narcotic drugs, the **cultivation of cannabis in confined spaces** is gaining increasing popularity.[[11]](#footnote-12)  Bulgaria also retains its characteristics as a transit zone in drug trafficking to and from Europe, given the Balkan Route that passes through it.
* Significant **increase in cybercrime** and computer-related alerts. There has been an increase in financial fraud on the internet, carried out by illegally hacking into electronic mailboxes, bank fraud, carried out by compromising the e-banking service and the use of so-called financial mules, receiving illegally ordered transfers into bank accounts. There has also been an increase in the number of SPAM attacks against Bulgarian users.
* In 2023, Bulgaria was included in the **"grey list"** of countries placed under "enhanced surveillance" by the Financial Action Task Force (FATF). In October 2023, Bulgaria made a high-level political commitment to work with FATF and MONEYVAL to strengthen the effectiveness of its AML regime. [[12]](#footnote-13)
* The normalisation of border crossings has increased the movement through illegal channels of **arms and ammunition trafficking**.[[13]](#footnote-14)

Regarding the activities of the Ministry of Interior's structures for fighting organised crime, improvements have been observed in almost all indicators (see Figure 1). Compared to 2019, 14% more specialised police operations (SPOs) were conducted in 2022. In the same period, there has been a significant increase in new pre-trial proceedings (81%), pre-trial proceedings concluded (85%) and investigation cases (31%).

Figure 1 Activities of the Ministry of the Interior related to the fight against organised crime

*Source: summary based on the annual reports on the activities of the Ministry of Interior*

In the period 2019 - 2023 the following strategic documents related to the internal security of the Republic of Bulgaria were adopted:

* Crime Prevention Strategy 2021-2030
* National strategy for the prevention and fight against irregularities and fraud affecting the financial interests of the EC for the period 2021-2027.
* National Drug Strategy 2020-2024
* National Strategy for Combating Trafficking in Human Beings 2017-2021
* National Cyber Security Strategy "Cyber Resilient Bulgaria 2023"

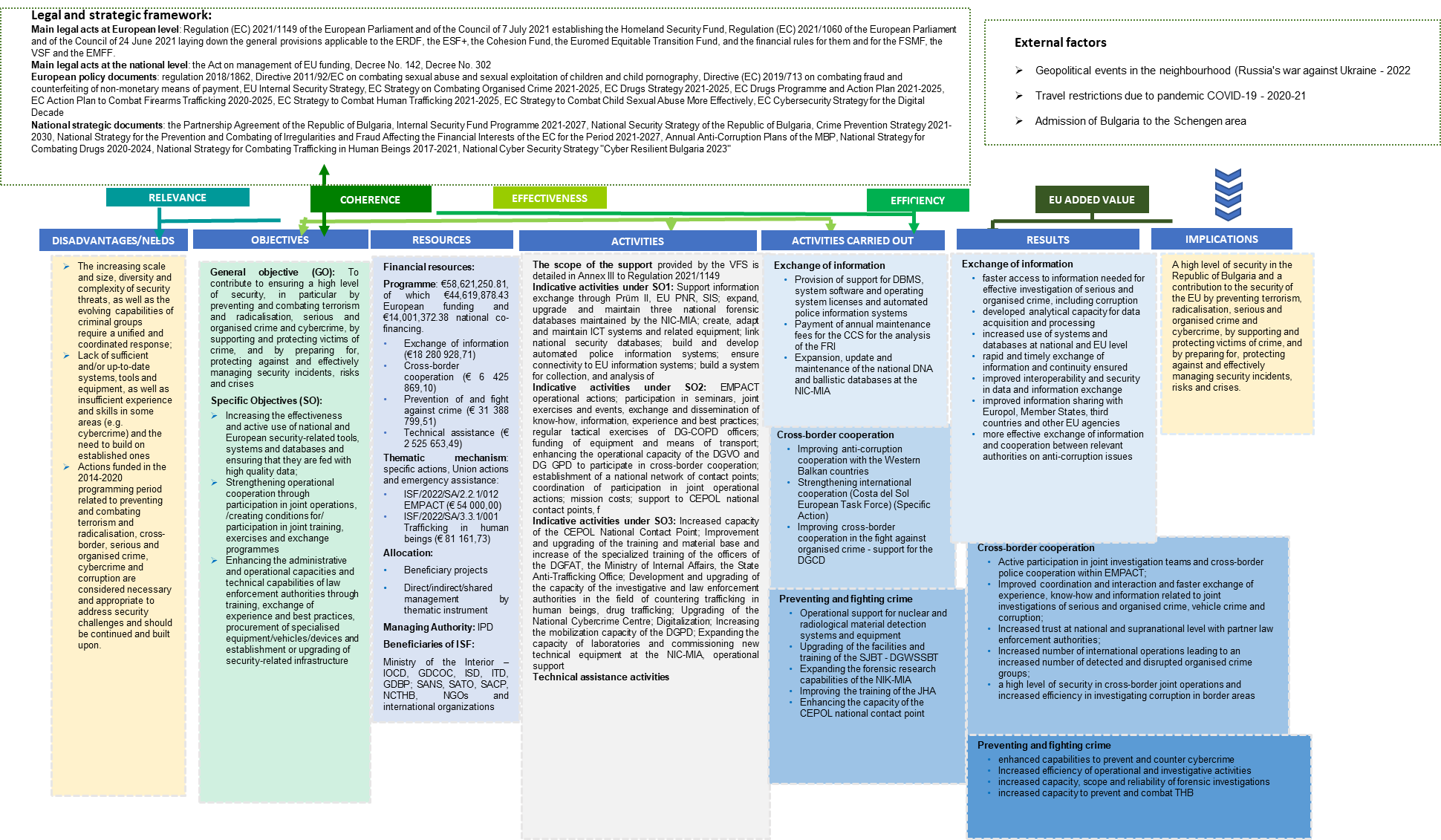
In the period 2019 - 2023, numerous policies on internal security have been developed at European level, the most significant of which are:

* EU Strategy against Organised Crime 2021-2025
* EU Drugs Strategy 2021-2025
* EU Drugs Programme and Action Plan 2021-2025
* EU Action Plan to combat firearms trafficking 2020-2025,
* EU Anti-Trafficking Strategy 2021-2025
* EU strategy to fight child sexual abuse more effectively 2020-2025
* EU Cyber Security Strategy for the Digital Decade from 2020

## Intervention logic

The logic of the ISF intervention is presented below. It provides an overview of the general and specific objectives of the fund; actions, outputs and intended outcomes; rationale, contextual factors and impacts.

Figure 2 Intervention logic of the Republic of Bulgaria's PVF 2021-2027 programme.



## Evaluation methodology and limitations

### Summary of methods used

The methodological approach described below follows the sequential structure outlined in the ToR. An overview of our approach is presented in the graphic below.

Figure 3. General methodological approach

Interview questionnaires and survey

Task 3.3

Writing the final report

Task 3.2

Final analysis and triangulation

DATA COLLECTION

HOME

ANALYSIS AND REPORTING

Task 1.1

Start meeting

Task 1.2

Overview of information sources

Task 1.3

Overall development of the evaluation framework and methodological approach

Task 2.1

Documentary study

Task 2.3

Survey

Data collected for the evaluation

Task 3.1

Quantitative analysis

Final report

PRODUCTS



Task 2.2

Interviews

**TASKS**

**STAGES**

**The inception phase** allowed the team to further develop its understanding of the current legal and strategic framework and the existing empirical evidence on the implementation of the Republic of Bulgaria's ISF 2021-2027 programme. Based on this information, the data collection instruments (interview questionnaires, surveys) were developed to ensure the implementation of the next stage of service delivery.

**The data collection phase of the** mid-term evaluation included the following tasks:

* In-depth documentary research;
* Conducting in-depth interviews with 20 staff members of the Ministry of Interior – International Projects Directorate, Central Coordination Unit, beneficiaries of the programme - GDCOC (incl. with the management and project coordinator), SANS (incl. with the project manager and deputy project manager and project coordinator), Directorate Communication and IT Systems (with the project manager and project coordinator), Academy of the Ministry of Interior (deputy rector - project manager and expert from the directorate coordinating international projects).
* A survey with 21 respondents from the GDCOC - final beneficiaries of the ISF 2021-2027 programme.

The final stage, **Analysis and Reporting,** analyzed the available data to address the key evaluation questions and provide conclusions and recommendations for the remainder of the ISF 2021-2027 program implementation period. In answering the questions, the following analyses were also conducted:

* Analysis and assessment of the socio-economic environment and its impact on programme implementation
* Analysis and assessment of changes in development needs in terms of relevance to the needs of target groups identified in the programming process
* Analysis of the Union added value of the actions implemented under the Fund programme
* Analysis of the effectiveness of management and control systems.
* Analysis of coordination, coherence and complementarity between actions supported by the Fund programme and support provided by other Union funds.
* Analysis of actions carried out with, in or in relation to third countries

The main limitations of the applied methodology are the following:

* **Lack of a baseline**: due to the lack of a final evaluation of the previous financial period (2014-2020), it was necessary to collect information on the implementation of the programme from the financial period 2014-2020 in the framework of the interviews and documentary review.
* **The short timeframe to complete** the assessment (3 weeks) did not allow to go into much depth on the needs analysis. This was offset by good mobilization by the DMP to provide information, distribute the surveys, and schedule the interviews.
* **Lack of sufficient progress in project implementation:** theevaluation of effectiveness was hampered by the early stage of programme implementation, the lack of indicators yet reported, or procurement carried out or implemented. The focus of stakeholder consultations was mainly on the needs and expectations for successful project implementation.

# Current status of the programme

## Procedural progress

Despite some delays in the development and approval of Bulgaria's ISF programme, with the launch of two calls for grant applications to specific beneficiaries and the conclusion of 14 agreements at the end of 2023, procedural progress towards the beginning of 2024 can be described as satisfactory.

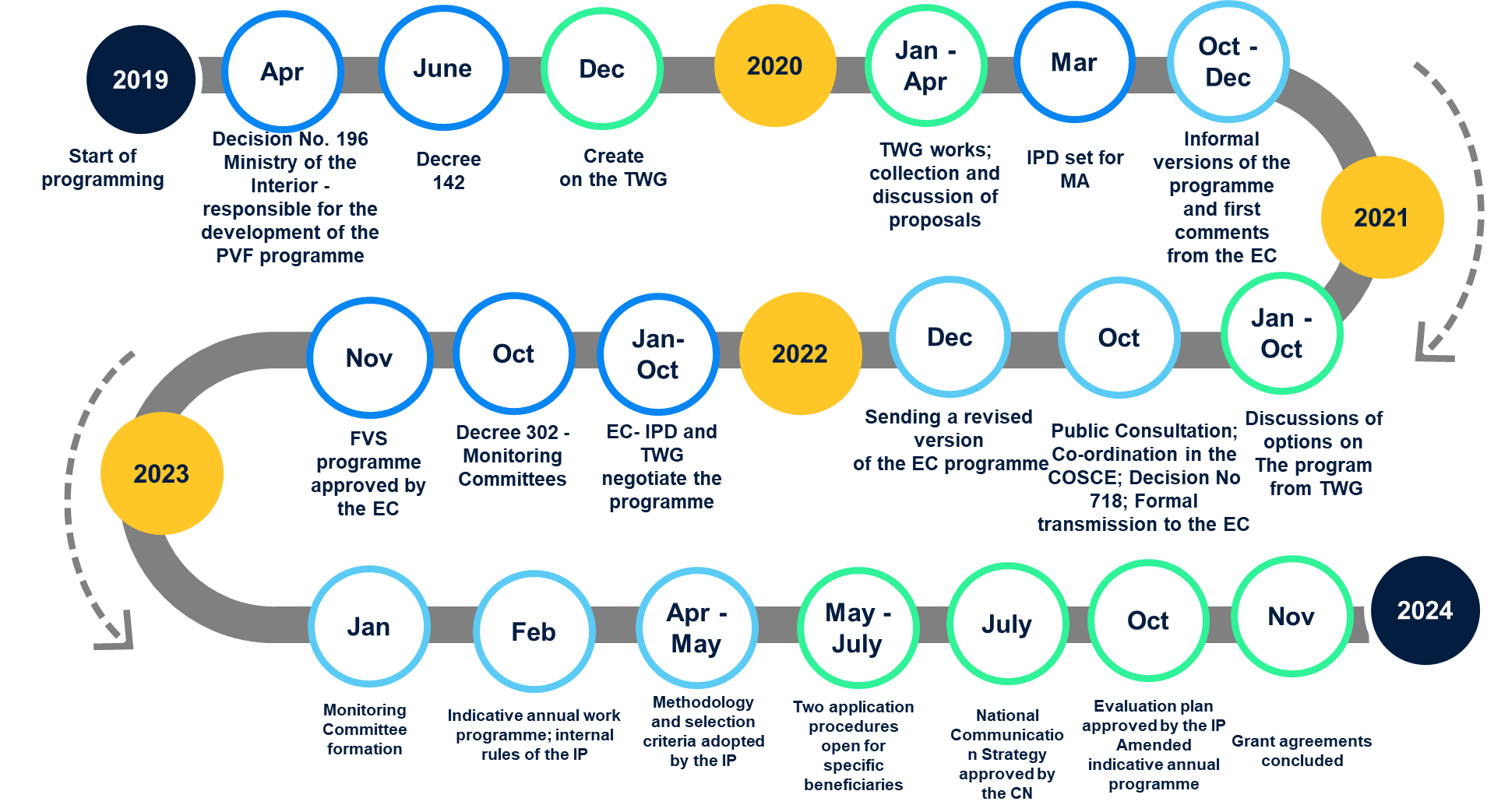
Preparations for the adoption of the ISF programme begin in 2019 (see Figure 4) This process has started with the adoption of the 2019 Council of Ministers Decision No. 196[[14]](#footnote-15) , approving an analysis of the socio-economic development of Bulgaria 2007-2017 to determine the national priorities for the period 2021-2027. According to Article 3 (l), the Ministry of the Interior is designated as the lead agency for the development of the ISF program for the period 2021-2027. The Council for Coordination in the Management of European Union Funds is tasked with the discussion of the priorities to be funded in the 2021-2027 programming period, including the ISF, under Decree No. 142[[15]](#footnote-16) of June 2019 on the development of strategic and programming documents (Art. 2.2). Article 7 of the same legal act establishes thematic working groups for the development of the ISF programme.

The Thematic Working Group was established by order of the Minister of the Interior in December 2019 and in 2020, started working on the development of the programme, using as a basis the programme document received from the European Commission with priority topics to be included. The Working Group is headed by a line Deputy Minister, the Secretariat is the International Projects Directorate, and the members are public authorities (structures of the Ministry of Interior, SANS, State Agency for Technical Operations, Central Coordination Unit, Managing Authorities of Programmes under other European Funds, NCTBH), international and non-governmental organisations (International Organisation for Migration and CSD), academics. The competent structures and agencies sent information on the priorities and measures to be included in the ISF programme. Initially, 41 proposals were received from 14 government structures with a total indicative budget of around 195 million euro. This significantly exceeded the indicative budget for the ISF programme. By the end of the year, an informal draft of the programme had been discussed and sent to the European Commission, and 2021 started with a discussion of the comments received from the European Commission. Discussions on the unofficial versions of the programme, the EC's comments on them and the indicative allocation for the programme continue until October 2021. In October 2021, following a public consultation and coordination in the EU Funds Coordination and Management Board, the first official draft of the Bulgarian ISF programme was approved with Decree No 718[[16]](#footnote-17) and sent to the European Commission in accordance with Regulation (EU) 2021/1060. In December 2021, a draft programme was sent to the European Commission with comments reflected, and the TWG approved a list of priorities and measures to be supported under Bulgaria's programme under the Fund. By November 2022, the process of negotiating Bulgaria's programme under the Fund with the European Commission was actively ongoing, with a final version of the Internal Security Fund programme for Bulgaria being approved on 7 November.

In the meantime, in implementation of the Decision No. 302[[17]](#footnote-18) , a Monitoring Committee for the Internal Security Fund Programmes and the Instrument for Financial Support for Border Management and Visa Policy 2021-2027 has been established by order of the Minister of the Interior. Pursuant to the Decree No 302, the range of organisations nominating members to the Monitoring Committee has been expanded to include non-governmental and international organisations, representatives of social and economic partners (trade unions and employers' organisations), representatives of regional and local authorities, organisations of disadvantaged people, representatives of the academic community. In 2023, the Monitoring Committee was able to adopt the internal rules of procedure, the Indicative Annual Work Programme for 2023, the methodology and criteria for the evaluation of project proposals, the programme evaluation plan, the communication strategy, at meetings of the Monitoring Committee and through written absentee decision-making procedures.

In the period May-July 2023, two grant procedures are open for specific beneficiaries covering all three specific objectives of the Internal Security Fund. The focus is on operational cooperation and support for the necessary efforts to improve and intensify cross-border cooperation to prevent and combat serious and organised crime. Secondly, the need to provide support for the acquisition of appropriate equipment and the enhancement of capacities to counter crime was included. The support for information exchange was aimed at supporting information and communication systems and networks in the Ministry of the Interior, ensuring interoperability and security in data exchange and operational support aimed at supporting security-related Union and national ICT systems and networks. Under the first procedure, 8 project proposals were submitted and approved for a total amount of BGN 41 343 254.72. Under the second procedure, 6 project proposals were submitted and approved for a total amount of BGN 21 834 369.99. The funding agreements were concluded and implementation of 14 projects started in November 2023.

Figure 4 Procedural progress of Bulgaria's ISF programme (2021-2027) in the period 2019-2023.



*Source: Elaboration by PMG Analytics based on annual performance reports and minutes of TWG and MC meetings*

## Financial Progress

### Financial allocation

The approved programme of the Republic of Bulgaria under the Internal Security Fund for the period 2021-2027 totals **€58,621,250.81**, of which the Union financial contribution is €44,619,878.43 and the national contribution - €14,001,372.38. The funds have the following breakdown by specific objective (see Figure 5):

* SO1 Exchange of information - **€18,280,928.71** in total, of which the Union financial contribution is €13,710,696.53 and the national contribution €4,570,232.18 (75% co-financing rate)
* SO2 Cross-border cooperation - **€6,425,869.10** in total, of which the Union financial contribution is €4,828,401.82 and the national contribution €1,597,467.28 (75% co-financing rate excluding Actions under Annex IV of Regulation 2021/1149 - 90%)
* SO3 Prevention and Combatting Crime - **€31,388,799.51** in total, of which the Union financial contribution is €23,555,126.59 and the national contribution is €7,833,672.92 (75% co-financing rate excluding Actions under Annex IV of Regulation 2021/1149 - 90%).
* Technical assistance - **€2,525,653.49** in total, of which the Union financial contribution is €2,525,653.49 (100% co-financing rate).

Figure 5 Financial breakdown by specific objective

*Source: Elaboration of PMG analytics of the approved ISF programme*

The approved programme includes two specific actions for a total amount of €143 271:

* Under SO2 Cross-border cooperation: ISF/2022/SA/2.2.1/012 EMPACT for €54,000, participation in the Costa del Sol European Operational Team
* Under SO3 Prevention of and Fight against Crime: ISF/2022/SA/3.3.1/001 THB €81,161.73 for the project "Coordination of Services for Victims of Trafficking in Human Beings in the Southern and Eastern Balkans" of Greece
* Technical assistance €8,109.70

### Selected operations

By the end of 2023, **60% of the total budget** of theInternal Security Fund **programme**, or more than €32 million, **has been contracted** (see Figure 6). The highest share of contracted funds is under Specific Objective 2, where 3 projects have been selected for a total of € 4,211,122, representing 72% of the budget under the specific objective. With regard to Specific Objective 1, 5 projects have been contracted for a total of €8,294,148, representing about 45% of the allocation under the objective. The contracts concluded under Specific Objective 3 are 6 and total €19,797,397, representing about 63% of the allocation under this heading.

In terms of type of implementation, the contracted operational support totals €5,446,892 or close to 17% of the contracted funds. The highest percentage contracted is for actions covered by Article 12(1) of Regulation 2021/1149 - 83% or €26,815,775. Under specific actions, €40,000 (less than 1% of contracted funds) was contracted.

Figure 6 Funds contracted under the ISF programme (amount and %)

*Source: Elaboration by PMG Analytics based on Transmission of Data - Article 42 dated 31.01.2024.*

In terms of the areas that the approved interventions support, the largest amount of funds is currently targeted at the area of organised crime - other (around 32%) (according to the categories set out in Table 1 of Annex VI of Regulation 2021/1149) (see Figure 5). A relatively high percentage of funds are directed towards cybercrime (nearly 20%), forensics (18%) and critical infrastructure protection (11%).

Figure 7 Breakdown of contracted funds by intervention area

*Source: Elaboration of PMG Analytics based on the data on approved projects in EUMIS*

Figure 8 Distribution of contracted funds from the ISF programme by type of action

*Source: summary by PEMG Analytics based on Transmission of Data - Article 42 dated 31.01.2024.*

The breakdown of the contracted funds by type of action shows that by the end of 2023, the most significant budget is allocated to ICT systems and interoperability (about 56%), buildings and facilities (20%), exchange of good practices (about 12%) and training (about 11%). The distribution of the contracted funds by type of action follows to some extent the indicative distribution set out in the approved ISF programme of the Republic of Bulgaria. The approved programme also foresees the most significant budget for actions related to ICT systems (42%). However, the indicative allocation allocates to equipment 20% of the allocated equipment budget, while currently 1% of the contracted funds are allocated to this type of action.

As of the end of 2023, all 14 projects approved under the ISF programme are in their second month of implementation. The tendering procedures related to the implementation of the projects are under preparation. For this reason, at the end of 2023, there are still no disbursements under the programme.

## Physical progress

Although the approved projects under the ISF programme were launched in November 2023, most of the beneficiaries are well advanced in preparing the tenders that are foreseen to implement the projects.

By the end of 2023, within the framework of Specific Objective 1 "Exchange of Information", the agreed support would allow strengthening the exchange of information, maintenance of information and communication systems and networks in the Ministry of Interior and ensuring interoperability. Operational support under this heading is to ensure the reliable and seamless operation and maintenance of systems used for law enforcement purposes: maintenance of automated police information systems; provision of vendor support for Database Management System licences, system software and operating systems; and payment of annual maintenance fees for a specialised software system for the analysis of financial intelligence information received under the Anti-Money Laundering Act. In terms of output indicators, the approved projects foresee a total of 7 ICT systems created/adapted/maintained, which, if implemented, will achieve 100% of the intermediate target set for this indicator (see Table 1). As regards the other output indicators under specific objective 1, the agreed projects will not be sufficient to meet their intermediate targets. At the end of 2023, there are no contracted interventions under Specific Objective 1 that foresee expert meetings/seminars/study visits. As regards the result indicators, the implementation of the approved projects would lead to the achievement of 64% of the 2029 target for the indicator "Number of ICT systems interoperable across Member States/security-related EU and decentralised information systems/international databases" and 50% of the 2029 target. for the indicator "Number of administrative units that have recently implemented or adapted existing mechanisms/procedures/tools/guidelines for information exchange with other Member States/Union bodies, offices or agencies/third countries/international organisations" (see Table 2). Due to the lack of approved projects with expert meetings/workshops/study visits, no significant progress was observed in the outcome indicators related to training participants.

By the end of 2023, within the framework of Specific Objective 2 "Cross-border cooperation", part of the funds will be directed towards improving and intensifying operational cross-border cooperation and coordination between the Western Balkan countries in the field of prevention and counteraction of corruption, and the capacity of the Internal Security Directorate in this regard. 90% of the contracted funds have the main objective of strengthening operational cooperation with EU partner services through participation in joint operations, implementation of good practices and European mechanisms in the framework of law enforcement operations in relation to serious and organised crime with a cross-border dimension, as well as provision of necessary technical equipment or means of transport used for actions in the field of prevention, detection and investigation of serious and organised crime with a cross-border dimension. A review of the targets set for the output indicators in the approved projects shows that the implementation of these projects would lead to the programme exceeding the 2024 intermediate targets and fully meeting the 2029 final targets for almost all indicators (see Table 1). This is also reflected in the result indicators set out in the approved projects, which would also lead to 100% achievement of the targets set in the ISF programme for 6 of the outcome indicators (see Table 2). The only exceptions are the indicators "Number of administrative units that have developed/adapted existing mechanisms/procedures/tools/guidelines for cooperation with other Member States/authorities" and "Number of recommendations implemented in the framework of the Schengen evaluation" for which the programme has set higher targets.

By the end of 2023, within the framework of Specific Objective 3 "Prevention and Combatting Crime", the approved projects foresee the increase of the capacity of the national contact point of the European Union Agency for Law Enforcement Training (CEPOL) for the Republic of Bulgaria; the increase of the level of professional training of the police officers through the modernization of the infrastructure and security related trainings; the expansion of forensic research capabilities in the laboratories of the Forensics centre; the upgrade of the material Under this Specific Objective, operational support is provided to ensure that competent authorities are well prepared to meet evolving and emerging new threats such as radiological and nuclear threats. A review of the targets set for the output indicators in the approved projects shows that the implementation of the projects would lead to the achievement of the intermediate targets for some indicators (O.3.1; O.3.3; O.3.5; O.3.6) (see Table 1). For another set of output indicators (O.3.2; O.3.4; O.3.7; O.3.8), the intermediate targets set in the ISF programme are higher than what would have been achieved by the approved projects.

Table 1 Planned targets for selected operations in terms of output indicators

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Identification code** | **Indicator** | **Unit of measurement** | **Milestone (2024)** | **Target (2029)** | **Planned value in selected operations** | **% of selected 2024 milestone** | **% of selected 2029 target** |
| O.1.1 | Number of participants in training activities | Number | 400 | 450 | 50 | 13% | 11% |
| O.1.2 | Number of expert meetings/seminars/study visits | Number | 19 | 19 |  | 0% | 0% |
| O.1.3 | Number of ICT systems created/adapted/maintained | Number | 7 | 11 | 7 | 100% | 64% |
| O.1.4 | Number of units of equipment purchased | Number | 160 | 250 | 50 | 31% | 20% |
| O.2.1 | Number of cross-border transactions separately indicating: | Number | 9 | 29 | 29 | 322% | 100% |
| O.2.1.1 | -number of joint investigation teams | Number | 1 | 6 | 6 | 600% | 100% |
| O.2.1.2 | -number of operational actions in the EU/EMPACT policy cycle | Number | 6 | 14 | 14 | 233% | 100% |
| O.2.2 | Number of expert meetings/seminars/study visits/joint exercises | Number | 16 | 54 | 43 | 269% | 80% |
| O.2.3 | Number of units of equipment purchased | Number | 390 | 895 | 805 | 206% | 90% |
| O.2.4 | Number of vehicles purchased for cross-border operations | Number | 15 | 42 | 42 | 280% | 100% |
| O.3.1 | Number of participants in training activities | Number | 3380 | 6627 | 4525 | 134% | 68% |
| O.3.2 | Number of exchange programmes/seminars/study visits | Number | 42 | 121 | 2 | 5% | 2% |
| O.3.3 | Number of units of equipment purchased | Number | 115 | 1516 | 418 | 363% | 28% |
| O.3.4 | Number of vehicles purchased | Number | 32 | 32 |  | 0% | 0% |
| O.3.5 | Number of infrastructure components/security related equipment/tools/mechanisms built/purchased/upgraded | Number | 562 | 576 | 586 | 104% | 102% |
| O.3.6 | Number of crime prevention projects | Number | 2 | 6 | 3 | 150% | 50% |
| O.3.7 | Number of projects to support victims of crime | Number | 2 | 3 |  | 0% | 0% |
| O.3.8 | Number of victims of crime assisted | Number | 160 | 420 |  | 0% | 0% |
| On the procedure | Number of vehicles for which maintenance is provided |  |  |  | 100 | Not applicable | Not applicable |
| On the procedure | Number of training camps and certified instructor training |  |  |  | 30 | Not applicable | Not applicable |

Table 2 Planned targets for selected operations in terms of result indicators

| **Identification code** | **Indicator** | **Unit of measurement** | **Base value** | **Unit of measurement for the reference value** | **Reference year(s)** | **Target (2029)** | **Unit of measurement for the target value** | **Target value of all selected operations** | **% of agreed 2029 target** |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| R.1.5 | Number of ICT systems that are interoperable across Member States/ with EU security-related information systems and decentralised ones/ with international databases | Number | 0 | Number | 2021 | 11 | Number | 7 | 64% |
| R.1.6 | Number of administrative units that have recently introduced or adapted existing mechanisms/procedures/tools/guidelines for information exchange with other Member States/Union bodies, offices or agencies/third countries/international organisations | Number | 0 | Number | 2021 | 2 | Number | 1 | 50% |
| R.1.7 | Number of participants who found the training useful for their work | Number | 0 | share | 2021 | 370 | Number | 50 | 14% |
| R.1.8 | Number of participants who report three months after the training activity that they are using the skills and competences acquired during the training activity | Number | 0 | share | 2021 | 320 | Number | 40 | 13% |
| R.2.5 | Estimated value of assets frozen in cross-border operations | sum | 0 | euro | 2021 | 4200000 | sum | 4200000 | 100% |
| R.2.6.1 | Quantity of illegal drugs seized in cross-border operations - cannabis | kg | 0 | kg | 2021 | 0 | kg | 0 | Not applicable |
| R.2.6.2 | Quantity of illicit drugs seized in cross-border operations - opioids, including heroin | kg | 0 | kg | 2021 | 0 | kg | 0 | Not applicable |
| R.2.6.3 | Quantity of illegal drugs seized in cross-border operations - cocaine | kg | 0 | kg | 2021 | 0 | kg | 0 | Not applicable |
| R.2.6.4 | Quantity of illicit drugs seized in cross-border operations - Synthetic drugs, including amphetamine-type stimulants (including amphetamine and methamphetamine) and ecstasy | kg | 0 | kg | 2021 | 0 | kg | 0 | Not applicable |
| R.2.6.5 | Quantity of illicit drugs seized in cross-border operations - new psychoactive substances | kg | 0 | kg | 2021 | 0 | kg | 0 | Not applicable |
| R.2.6.6 | Quantity of illicit drugs seized in cross-border operations - other illicit drugs | kg | 0 | kg | 2021 | 400 | kg | 400 | 100% |
| R.2.7.1 | Quantity of weapons seized in cross-border operations - combat weapons: automatic firearms and heavy firearms (anti-tank, rocket launchers, mortars, etc.) | Issue | 0 | Issue | 2021 | 5 | Issue | 5 | 100% |
| R.2.7.2 | Quantity of weapons seized in cross-border operations - other short-barreled firearms: revolvers and pistols (including saluting or acoustic weapons) | Issue | 0 | Issue | 2021 | 5 | Issue | 5 | 100% |
| R.2.7.3 | Quantities of weapons seized in cross-border operations - other long-barrelled firearms: rifles (including saluting or acoustic weapons) | Issue | 0 | Issue | 2021 | 5 | Issue | 5 | 100% |
| R.2.8 | Number of administrative units that have developed/adapted existing mechanisms/procedures/tools/guidelines for cooperation with other Member States/Union bodies, offices or agencies/third countries/international organisations | Issue | 0 | Issue | 2021 | 38 | Issue | 2 | 5% |
| R.2.9 | Number of staff involved in cross-border operations | Issue | 0 | Issue | 2021 | 111 | Issue | 111 | 100% |
| R.2.10 | Number of recommendations implemented under the Schengen evaluation | Issue | 0 | Issue | 2021 | 100 | rate | 0 | 0% |
| R.3.9 | Number of radicalisation prevention initiatives developed/expanded | Issue | 0 | Issue | 2021 | 5 | Issue | 0 | 0% |
| R.3.10 | Number of initiatives developed/expanded to protect/support witnesses and whistleblowers | Issue | 0 | Issue | 2021 | 3 | Issue | 0 | 0% |
| R.3.11 | Number of critical infrastructures/public spaces with new/adapted security risk protection facilities | Issue | 0 | Issue | 2021 | 34 | Issue | 33 | 97% |
| R.3.12 | Number of participants who found the training activity useful for their work | Issue | 0 | share | 2021 | 5826 | Issue | 3800 | 65% |
| R.3.13 | Number of participants who report three months after the training activity that they are using the skills and competences acquired during the training activity | Issue | 0 | share | 2021 | 5664 | Issue | 3638 | 64% |

# Evaluation findings

## Relevance

**Relevance** addresses the relationship between needs and problems in society and the goals of interventions, and touches on aspects of programming and design. As circumstances and contexts change over time, the needs and problems that the three funds address may change and new ones may arise.

### To what extent does the programme respond to evolving needs?

The assessment of the relevance of all agreed and planned interventions to the real needs of internal security at national and Union level at this time can be made primarily in terms of the **method applied to ensure relevance to needs**. On this front, the responsible authority for the development of the ISF 2021-2027 programme, the Ministry of Home Affairs, has taken the following measures to ensure this compliance:

* Pursuant to Article 7 of the Decree No. 142 and by order of the Minister of the Interior, a **thematic inter-ministerial working group** was established to develop the programme of the Republic of Bulgaria under the Internal Security Fund. The TWG ensured the application of the principle of partnership as laid down in Article 8 of Regulation 2021/1060 in the preparation of the programming document. Furthermore, the thematic working group includes all stakeholders working in the field of internal security in Bulgaria (see section 2.1 for details on the composition). For the most part, these are structures within the Ministry of the Interior itself or institutions that cooperate operationally with what has contributed to the constructive dialogue within the working group.[[18]](#footnote-19) The Working Group's rules of procedure provide an opportunity for other stakeholders to participate or be consulted as appropriate. All informal and the two formal versions of the ISF programme have been agreed within the TWG. In the process of prioritizing needs, there has been active communication between the Internationa Projects Directorate and stakeholders as well as workshops outside of the TWG.[[19]](#footnote-20) The establishment, operation and composition of the TWGs indicate that programme **stakeholders were correctly identified** at the programming stage **in line with the objectives** set out in Regulation 2021/1149 and Regulation 2021/1060.
* **A bottom-up approach has been applied** in deriving the **internal security needs**. IPD has given the potential beneficiaries of the programme represented in the TWG the opportunity to identify their own needs and formulate their proposals for priorities and measures to be included in the programme.[[20]](#footnote-21) Subsequently, taking into account the indicative ISF budget allocated to Bulgaria, the rules set out in Regulation 2021/1149 and the comments of the European Commission, each institution, in cooperation with the IPD, edited and prioritised its propositions for the type and scope of measures.[[21]](#footnote-22) The application of this approach has to a large extent enabled the **needs analysis** leading to the definition of the programme and the related resource allocation to **be in line with the needs of the relevant stakeholders**.

A review of the minutes of the TWG meetings show that many stakeholders have had to prioritise their needs in order to comply with the resources available to Bulgaria under the ISF and the rules on the percentages eligible for funding for certain types of activities. Initially, the aggregate of proposals from agencies in the internal security sector exceeded almost three times the program's indicative budget.[[22]](#footnote-23) Many of the grantees interviewed said that they had to abandon activities included in their proposals to IPD.[[23]](#footnote-24) Some activities were dropped due to lack of a clear justification to ensure compliance with the rules of Regulation 2021/1149 (e.g. Construction of a new building for the BPD G. Delchev at the BPD Smolyan), and the responsible institutions considered seeking funding for these activities from the national budget.[[24]](#footnote-25) Other activities have remained in the programme, but the funding for their implementation has been set aside for after the mid-term review in 2024 (e.g. the measure "Continued development and implementation of a PNR system" of SANS).[[25]](#footnote-26) On the basis of the discussions in the TWG and the working meetings between the IPD and the different departments within the TWG, a list of measures and priorities has been approved to be funded with the initial resources allocated to Bulgaria.[[26]](#footnote-27) With the first indicative annual work programme of the ISF programme, the Managing Authority and the partner organisations included in the Monitoring Committee have also made efforts to prioritise operations whose implementation is directly linked to the strengthening of the operational and administrative capacity of the national competent authorities, the exchange of information and the development of operational cooperation in line with EU requirements and priorities.[[27]](#footnote-28)

Although the bottom-up approach to identifying and prioritising needs enables the priorities and measures set out in the programme to be aligned with the needs of relevant stakeholders, it is difficult to draw conclusions about the extent to which the internal security sector entities have been able to identify their needs based on evidence-based analysis and expert opinion. The programming period coincides with a dynamic period for Bulgaria politically, with frequent changes of government, sometimes leading to changes of leadership of the internal security structures. This creates a risk that decisions on priority funding measures are taken by the management without consulting experts and middle management officials. However, a survey conducted with end-users of ISF support showed that, to a very large extent, the needs of the project that their institution will implement have been correctly identified and prioritised (see Figure 1). The proportion of respondents who considered that the measures described in the project met the needs of their unit reached up to 90% for some activities.

Figure 9 Summary of responses to the question "In view of your experience, to what extent in your work do you identify a need for the following support for the effective operation of your unit", %

*Source: Survey with GDFOC officers*

Another factor that may have negatively impacted the prioritization of the needs of the various departments in the internal security sector is the fact that the programming process coincided with the restrictive measures put in place due to the spread of COVID-19. Thus, the TWG meetings were held in an online environment, which may have impacted the quality of needs prioritization discussions.[[28]](#footnote-29) Restrictions on organising group meetings and the additional commitments of MoI structures related to the declaration of an emergency state may also have limited intra-agency discussions on the most pressing needs to be addressed with the support of the ISF.

### To what extent can the programme adapt to changing needs?

The early stage of implementation of the ISF programme makes it difficult to assess the extent to which it can adapt to changing needs. By the end of 2023, neither the programme nor the projects approved under it had to be substantially or non-substantially modified.[[29]](#footnote-30) No contextual changes and related new needs have been discussed in the Programme Monitoring Committee, although there is an event in the period under review that may have an impact on the environment - Bulgaria's accession to the Schengen area (air and sea borders). A large part of the Monitoring Committee's decisions are taken in written procedure (7 written procedures in total for the period) and there were two attendance meetings in 2023.[[30]](#footnote-31) On the one hand, holding written procedures for absentee decisions of the MC allows for more flexibility in the implementation of the programme and compliance with the deadlines set in the annual work programmes. On the other hand, it limits the possibilities for MC members to raise issues related to the changing environment for discussion, which a face-to-face meeting facilitates.

Beneficiaries of the ISF programme consider that the rules set out in Regulation 2021/1149 have provided sufficient flexibility in the design of interventions.[[31]](#footnote-32) There have been activities that should have been dropped from their proposals, not because of ineligibility, but because of budget constraints and compliance with the different ceilings for types of actions and implementation set out in the Regulation.[[32]](#footnote-33) In terms of flexibility within projects, the MoI Academy plans to amend its project as one of the activities has received funding under the Sustainability and Recovery Plan.[[33]](#footnote-34) Their experience with the implementation of interventions from the previous programming period and those under other financial instruments indicates that there are usually no obstacles to reallocating funds to other activities.[[34]](#footnote-35) There is almost no flexibility in procurement procedures - a large proportion of contracts have to go through prior control, all time limits in the Public Procurement Act have to be met, which sometimes leads to delays in the conclusion of implementation contracts.[[35]](#footnote-36) Various factors in the economic life of the country and the world (including inflation) has led to market studies done at the stage of applying for support not being up to date at the time of project implementation.[[36]](#footnote-37) In addition, the relatively frequent changes in the regulatory framework in the country may also render the initial project budgeting inadequate at the implementation stage.[[37]](#footnote-38) An example of this is the new emission level requirements for vehicles purchased by public institutions.

With regard to changes at the level of the ISF programme, the Managing Authority considers that they are well aware of the rules and procedures for implementing non-substantial and substantial changes to the programme.[[38]](#footnote-39) Their experience from previous programming periods indicates that if the need for change is identified and triggered in a timely manner, there is no problem in meeting changing needs.[[39]](#footnote-40)

## Effectiveness

**Efficiency analysis** looks at how successful EU-funded actions have been in achieving or progressing towards the objectives set. The evaluation will form an opinion on the progress made so far and the role of the interventions in achieving the observed changes. The mid-term evaluation will also analyse whether the objectives can still be achieved on time or with what delay.

### To what extent is the programme on track to achieve its objectives?

As can be seen from the description of the current status of the programme in Section 2, the implementation of the programme is moving with some delays, mainly in the level of disbursements at the end of 2023. The MA, in partnership with the Monitoring Committee members, has made the following efforts to overcome the delays:

* An Indicative Annual Work Programme for 2023 was prepared and approved, which was **ambitious in terms of the share of funds expected** to be contracted and provides **support for operations under all three specific objectives of the ISF**. In financial terms, the amount of funds foreseen for contracting in the indicative annual programme exceeded 60% of the total budget under Specific Objectives 2 "Cross-border cooperation" and 3 "Prevention and combatting crime" and reached 45% of the budget under Specific Objective 1 "Exchange of information" of Bulgaria's ISF programme. These percentages have also been reached after the approval of the projects submitted under the two open calls for proposals.[[40]](#footnote-41)
* **Beneficiaries have** been instructed **to start preparing tender documents** for the implementation of operations before the financial support agreements are signed.[[41]](#footnote-42) The active communication between the MA and the beneficiaries and the detail of the instructions given supported the timely start of the implementation.[[42]](#footnote-43) In this respect, some beneficiaries mentioned that they have started active preparation of the tendering procedures of the programme and consider that they will be able to meet the objectives of their projects on time.[[43]](#footnote-44) The level of detail on specific parameters of operations requested at the programming stage also helps them prepare tender documentation more quickly.[[44]](#footnote-45) In addition, beneficiaries also rely on the experience they have gained in implementing similar operations in previous programming periods.[[45]](#footnote-46) In addition, some of the beneficiaries have taken internal organisational measures to help speed up the preparation of procurement, such as allocating the workload related to the preparation of documentation to different experts, reporting weekly on the progress of each procurement procedure to the management of the department.[[46]](#footnote-47) According to the beneficiaries, successful procurement within the project timelines is also the main challenge that can negatively impact implementation and progress towards the Fund's objectives. [[47]](#footnote-48)
* In 2023, operations related to **operational support** were also approved to ensure reliable and seamless operation and maintenance of systems used for law enforcement purposes.[[48]](#footnote-49) In addition, payments for such interventions are usually possible at an earlier stage compared to other types of interventions.

The description of the current state of implementation of the programme showed that the high levels of contracting of funds in 2023 had also affected the targets set in the approved operations for the output and result indicators (see section 2.3). If the projects are successfully implemented, the programme would make significant progress towards the intermediate and final targets set for both types of indicators. Progress would be most tangible under the Cross-Border Cooperation SO, where the percentage of budget contracted under the objective is also highest. In view of the lack of contracted funds for support of victims of crime, it can be expected that the interim targets set under SO3 "Prevention and Combatting Crime" will not be met for the following output and result indicators: O3.7 Number of projects to assist victims of crime, O3.8 Number of victims of crime assisted. There may also be a failure to meet SO3 milestones due to a lack of sufficient contracted funds for operations that provide for exchange programmes/workshops/study visits (O3.2). At present, no funds have been contracted under SO1 "Exchange of information" for operations providing for the purchase of equipment (O1.4).

A survey conducted with end-users of one of the interventions also indicated that its implementation would contribute to achieving the objectives of the ISF programme. Respondents were unanimous that the activities. foreseen in the intervention would contribute to the achievement of the following outcomes set under SO2 in the programme (see Figure 10, Figure 11):

* Increased effectiveness of Bulgarian participation in joint investigation teams and cross-border police cooperation within EMPACT (86% of respondents);
* Increased effectiveness of coordination and interaction and faster exchange of experience, know-how and information related to joint investigations of serious and organised crime, including vehicle crime and corruption (86% of respondents);
* Increased trust at national and supranational level with partner law enforcement agencies (76% of respondents);
* Increased number of international operations leading to increased number of detected and disrupted organised crime groups (76% of respondents);
* A high level of security in cross-border joint operations and increased efficiency in investigating corruption in border areas (81% of respondents).

The majority of respondents also considered that the vehicles and equipment to be purchased under the project would greatly contribute to more and more efficient cross-border operations and support their daily work.

Figure 10 Summary of responses to the question "In view of your experience over the last three years, to what extent would securing the costs of participating in cross-border operations and joint investigation teams contribute to the effectiveness of":

Figure 11 Summary of responses to the question "In view of your experience over the last three years, to what extent is it likely that the costs of participating in cross-border operations and joint investigation teams, expert meetings/seminars/expertise exchange visits/joint scientists will be covered"

### To what extent is the monitoring and evaluation framework appropriate to inform progress towards programme objectives?

The monitoring and evaluation framework for the ISF programme follows rules included in Regulation 2021/1060 (Chapter 1 and 2 of Title IV) for generally applicable provisions and Regulation 2021/1149 (Section V and Annexes V and VIII). At the national level, the rules for monitoring and evaluation are laid down in the Act on management of European funds under shared management, where the rules for payments, verification and reporting of expenditure are included in Section II, and in Decree No 302, where the functions of the Monitoring Committee with regard to monitoring and evaluation are described (see section 3.2.3). Furthermore, in November 2023, the Monitoring Committee approved the evaluation plan of the ISF programme. In this programming period, the monitoring and evaluation rules for the ISF programme are aligned for the first time with those of the other Structural Funds. To some extent, this makes it easier for the Managing Authority and the Monitoring Committee, as they fully apply the applicable national legislation related to the management of EU funds and can rely on the accumulated experience of the other MAs for other programmes in this respect. [[49]](#footnote-50)

Within the Managing Authority, the Monitoring, Verification and Payment Unit (MVP) is entrusted with the main responsibility for monitoring and evaluation of the programme and carries out technical and financial verification through administrative and on-the-spot checks.[[50]](#footnote-51) The MA is also tasked with recording and storing in electronic form the data for each operation required for monitoring, evaluation, financial management, verification and audit purposes in accordance with Annex VII of Council Regulation (EU) No 2021/1060 and ensuring the security, integrity and confidentiality of the data and user authentication. The MA shall organise a meeting with the EC at least twice during the programming period for the ISF programme in order to review the quality of the implementation of the programme, follow up on the issues raised during the meeting and inform the EC of the measures taken within 3 months.[[51]](#footnote-52) By 15 February 2023 and by 15 February of each year thereafter up to and including 2031, the MA shall submit an annual report on the quality of implementation to the EC, in accordance with Article 41(7) of Regulation (EU) 2021/1060. The reporting period shall cover the last accounting year. The annual report on the quality of implementation shall be entered in the electronic data exchange system - SFC 2021. In this respect, the 2022 and 2023 SFC Annual Quality Performance Reports have been submitted on time. Five times a year (31 January, 30 April, 31 July, 30 September and 30 November), the MA submits cumulative data on the ISF programme to the EC in accordance with the template contained in Annex VII of Regulation 2021/1060, with the exception of data on output and outcome indicators, which are sent twice each year (31 January and 31 July). For this purpose, the experts of the MVP Unit shall verify the completeness and correctness of the data entered in the Management and Monitoring Information System (MMIS) for the quality performance indicators/indicators collected/accumulated as a result of the progress reported for the respective period for each project financed under the programmes. The indicator values in the MMIS are reconciled for each individual project and information is generated at programme level. It is correlated with the actual financial information on implementation during the period concerned. On the basis of the data generated in the MMIS, the MVP Unit prepares the information according to the template to be sent to the EC.

The Management and Monitoring Information System (MMIS) for the European funds under shared management (EFSM) itself is maintained by the Central Coordination Unit and ensures the electronic exchange of information and documents between it, the EFSM management and control bodies and the applicants and beneficiaries of financial support.[[52]](#footnote-53) Pursuant to Article 21 of the Act on management of European funds under shared management, the Central Coordination Unit, the authorities for the management and control of the EUSF funds, the applicants and beneficiaries shall enter, collect and systemise correct and reliable information on the implementation, management, monitoring, evaluation and control activities of the programmes referred to in Article 3(2) and the projects according to their competence in the MMIS and in compliance with the principles of reduction of administrative burden, effectiveness, efficiency and economy.[[53]](#footnote-54) During the interview, the MVP Unit mentioned that the MMIS system is very intuitive and easy to use, very well supported and innovations are constantly being made to facilitate the work of the MA and are successfully communicated.[[54]](#footnote-55) Beneficiaries also consider that the MMIS facilitates reporting on their projects, although due to internal rules on document flow in their institution the data entered in the MMIS has to be duplicated in written form.[[55]](#footnote-56)

Both the Managing Authority and the beneficiaries consider that the common indicators reflect the main achievements of the programme and are in line with the intervention logic of the ISF programme.[[56]](#footnote-57) The early stage of implementation of the programme does not allow to assess how easy they are to report and to what extent they will support the evaluation of the impact of the Fund. Evidence that the indicators follow the intervention logic of the programme is that only two procedure-specific indicators are currently set under approved projects - Number of vehicles supported; Number of training camps and certified training of trainers. At the moment, beneficiaries do not face difficulties in setting targets for their interventions as they have experience in this respect from previous programming periods.[[57]](#footnote-58) Beneficiaries have also received sufficient guidance from the MA on the content and reporting of indicators. [[58]](#footnote-59)

### How was the involvement of relevant partners ensured at all stages of programming, implementation, monitoring and evaluation?

As described in sections 2.1 и 3.1.1 at the programming stage, the involvement of the partner countries is ensured by the formation of a Thematic Working Group for the development of the ISF 2021-2027 programme.

Aster the approval of the programme the Monitoring Committee was established.[[59]](#footnote-60) Compared to the previous programming period and thanks to the application of the national provisions applicable to all programmes co-financed by EU funds under shared management in the Republic of Bulgaria, the membership of the Monitoring Committee has been extended.[[60]](#footnote-61) Alongside stakeholders in the internal security sector, the Monitoring Committee includes representatives of the social and economic partners (trade unions and employers' organisations), representatives of regional and local authorities, organisations of disadvantaged people, representatives of the academic community and NGOs. Decree No 302 of the Council of Ministers also lays down the rules for the procedure for identifying representatives of the academic community to participate in the Monitoring Committee and for selecting non-profit public benefit entities, the main objective being to ensure equal access to the opportunity to participate in the Committee and to select the most appropriate representative. Article 12 of the Decree describes in detail all the duties of the Monitoring Committee, which include both important activities related to the implementation of the programme (methodology and criteria for selecting operations; agreeing the indicative annual work programmes, approving the evaluation plan) and the monitoring of the programme (examining implementation and monitoring progress in programme implementation, examining information on the conclusions and recommendations of the annual monitoring reports). In the period up to the end of 2023, the Monitoring Committee for ISF Programme has held two meetings and taken decisions through five written procedures, thereby contributing significantly to the process of preparing for the start of programme implementation through the timely agreement and approval of the necessary documents.

The participation of the members of the Monitoring Committee and the rules for its work are laid down in the Internal Working Rules, which were approved at the very first meeting of the Committee. The Internal Rules clearly set out the functions of the Committee, its composition, the responsibilities of the Chair and members of the Committee and of the Secretariat, the requirements for its meetings and the rules for decision-making. A Code of Conduct is also included. Interviews with the Managing Authority and the beneficiaries who are part of the Monitoring Committee show that there are currently no serious shortcomings in the functioning of the Monitoring Committee for the ISF programmes.[[61]](#footnote-62)

In view of the above-mentioned mechanisms, the mid-term evaluation did not identify any shortcomings in the respect of the partnership principle in the programming, implementation, monitoring and evaluation of the ISF programme, as partners are actively involved already at the programming stage and their role is clearly defined in the national legislation and internal rules applied.

### To what extent does the programme respect or promote horizontal principles in its implementation?

The Managing Authority shall implement measures to ensure compliance with the horizontal principles set out in the Common Provisions Regulation as well as in national legislation, including compliance with the EU Charter of Fundamental Rights in the implementation of the programme - Article 9(1). The application of the principles of equal opportunities, transparency and equal treatment shall be monitored by the Managing Authority at all stages of preparation, evaluation and implementation of operations selected for support*.*

The preparation and implementation of the procedures for the award of grants under the ISF shall be carried out by the Managing Authority in accordance with criteria and a methodology for the selection of operations which are in conformity with the Charter of Fundamental Rights of the European Union. The Application Guidelines set out requirements for grant applicants to declare that the activities envisaged are in line with and contribute to the implementation of the horizontal policies as well as the implementation of the EU Charter of Fundamental Rights and the UN Convention on the Rights of Persons with Disabilities. At the appraisal stage of the project proposal, this compliance shall be verified by the Evaluation Committee and followed up by the Managing Authority staff at the implementation stage of the project proposal*.*

By signing the Application Form, beneficiaries and partners commit to respect the horizontal principles of Article 9 of Regulation (EU) 2021/1060. Any form of discrimination shall be avoided in the implementation of the project activities. All project activities shall be neutral with regard to the beneficiary's membership of any group, on any grounds whatsoever, and shall not impose any restrictions based on sex, race, nationality, ethnicity, citizenship, origin, religion or belief, education, opinion, political affiliation, personal or social status, disability, age, sexual orientation, marital status, property status or any other grounds established by law or international treaty to which Bulgaria is a party.

The beneficiaries try to apply the principle of gender equality in the formation of the teams involved in the implementation of the projects and the relatively good ratio of men and women in the internal security structures helps them.[[62]](#footnote-63) Regarding sustainable development policies, at the end of 2023, the Minister of Transport adopted a regulation setting out the clean vehicle requirements to be applied when procuring vehicles.[[63]](#footnote-64) This will make it significantly more difficult to purchase vehicles for one of the approved projects, as project budgeting has not been done according to the new vehicle requirements.[[64]](#footnote-65) Projects that provide for construction have not provided for additional energy efficiency measures or compliance with standards that reduce global carbon emissions beyond the requirements in the legislation.[[65]](#footnote-66) This is largely indicative of a lack of comprehensive policy by institutions in the internal security area regarding green policies, rather than indicating that program implementation is not consistent with the goal of promoting sustainable development*.*

The mid-term evaluation of the ISF programme did not identify any major gaps or problems related to the implementation of the horizontal principles.

### How effective is the program in communicating and disseminating its capabilities as well as accomplishments?

The Managing Authority has developed a communication strategy with properly defined target groups. The strategy was approved by the Monitoring Committee by a non-consensual decision adopted by written procedure in July 2023.[[66]](#footnote-67) The national communication strategy provides the methodological basis on which the MA for the ISF organises its publicity, information and communication activities. It also includes a Handbook on the visualisation of EU support for the implementation of information and communication rules 2021-2027, which unifies the requirements for all beneficiaries. The institutional framework for the management of information and communication activities, the objectives and target groups of information and communication activities, and communication channels are also described in the Management and Control System.[[67]](#footnote-68)

At the beginning of the new programming period, communication activities include the launch of calls for proposals, information days for beneficiaries and training for beneficiaries. The main communication objectives are to ensure the visibility, transparency and publicity of the activities, to reach the widest possible audience, and to raise awareness of current and potential stakeholders.

Dissemination activities reach the target audience and are carried out through an appropriate mix of communication channels, mainly publishing the information online as well as organising information days. Up-to-date information is published regularly on the Managing Authority's website: <https://www.mvr.bg/dmp> , where regulatory documents, guidelines for beneficiaries, information on information days and other useful information are systematically published. The Single Information Portal on the European Funds under shared management: [www.eufunds.bg](http://www.eufunds.bg/) also promotes funding and transparency of the EFSM processes. The programme's Facebook page is also actively used: [https:](https://www.facebook.com/BGISF)//www.facebook.com/BGISF. It publishes information on the EU funding made available and the possibilities to apply.

Implemented the following communication activities[[68]](#footnote-69) :

* 2 trainings for beneficiaries under the Public Procurement Act with the participation of 300 colleagues. The trainings covered aspects of the ISF;
* 2 trainings for beneficiaries who have signed administrative contracts/orders. A total of 160 people have participated in these trainings.
* In June, two information days were organised for specific beneficiaries to present the two open procedures of the programme.
* The fund's Facebook page has 271 followers. Posts made by February 2024 have reached over 10 thousand people, with just over a thousand people interacting with the content.

For each of the projects approved under the programme, measures and a budget for communication activities have been set. The budget set in the approved interventions in this direction amounts to about 442 thousand BGN or about 1% of the contracted funds.[[69]](#footnote-70) The description of the communication activities in the approved projects shows that the funds are mainly aimed at the placement of signs or boards, the production of promotional materials, the holding of press conferences and other information events.[[70]](#footnote-71)

It is not clear from the communication activities described for individual operations whether social media will be used to reach a wider audience. A review of the use of social media (mainly Facebook) to communicate the achievement activities of the fund shows that the information is mainly aimed at communicating the activities of the IPM (which has added value mainly to the stakeholders of the IPM. Opportunities to reach the general public through a wider range of social media (e.g. Instagram, X) used by different age categories about the achievements of individual operations have not been used.

In conclusion, the communication and visualisation activities under the ISF 2021-2027 follow the objectives set out in the Communication Strategy and are in line with the implementation of the Programme of the Republic of Bulgaria.

## Efficiency

Effectiveness looks at the relationship between the resources used for the intervention and the changes generated by the interventions. The interim evaluation will look at how the chosen approach to implementing the interventions has influenced the effects.

### To what extent does the programme support cost-effective measures?

Due to the stage of implementation of the interventions approved under the ISF programme, it is too early to assess how cost-effective they are. The rate of absorption of the planned funds does not currently jeopardise the implementation of the ISF programme or indicate a need for additional payments. The Managing Authority has set up a system of rigorous monitoring of the cost-effectiveness of the activities implemented. In the first instance, quotations are requested at the project proposal stage for all services and equipment to be purchased with ISF funds. In the evaluation of the project proposals themselves, part of the quality criteria relate to budget and cost effectiveness:[[71]](#footnote-72)

* The project proposal represents the best balance between the amount of support, the activities to be implemented and the achievement of the objectives set;
* The required percentages between budget sections have been met, and the required percentage of indirect and project management costs has been respected;
* The costs are fully necessary for the implementation of the project;
* The values set are realistic and do not exceed the beneficiary's average rates taking into account inflationary processes and/or are comparable to market prices;
* The funding requested (grant) is eligible under the Fund's rules;
* The projected revenue from the project is indicated and allocated as required by the application guidelines.

At the project implementation stage, changes to the original budget line values resulting in an increase or decrease of more than 10% of the agreed budget section values; or the creation of new budget lines must be approved by the MA and a supplemental agreement executed.[[72]](#footnote-73) The MA has the right to refuse the amendment if it is not sufficiently justified. Amendments to aid agreements are not allowed where they would result in an overrun of the budget headings for which there is a fixed amount in a legal act, in an act of European Union law or in the relevant application guidelines; or would call into question the achievement of the project's main objective and planned results and call into question the decision to grant the aid;

### How effective is the management and control system?

The institutional system of governance and control is largely determined by the European and national legal framework. It guarantees the independence and objectivity of the individual processes. At this early stage, the management and control framework is practically only implemented in terms of choice of operations. The other aspects are based on European and national standards, practices and procedures, which largely ensure the effectiveness of the framework.

***General framework for control***

The management and control system is largely determined by the European and national legal framework for the management of EU funds. The Decree No. 70 of 14.04.2010 assigns to the Minister of Finance the functions related to the management and control system of the AMIF, the ISF and the BMVI, as he is in charge of the overall organisation, coordination and control of the management system of EU funds under shared management. The control and management system is regulated by Decree No 712 of 6 October 2020 , which provides for:

* + - The managing authority for the ISF shall be the IMP of the Ministry of Interior
    - The Audit Authority shall be the Executive Agency for the Audit of European Union Funds;
    - The functions of the Central Coordination Unit under Article 10 of the European Structural and Investment Funds Management Act shall be performed by the Central Coordination Unit Directorate in the administration of the Ministry of Finance.

Figure 12 Governance Structure for the 2021-2027 ISF, BMVI and AMIF Programmes.

A diagram of a computer

Description automatically generated

Audit authority

Managing authority – IPD - Moi

European Commission

Financial reporting

Financial flows

Monitoring Committee ISF, AMIF, BMVI

Monitoring Committee central level

Central Coordination Unit: Ministry of Finance

Coordination Council

Minister for Finance

**Source: MOI - IPD**

The management and control process of the AMIF, the ISF and the BMVI also involves:

* Monitoring Committee for the Partnership Agreement of the Republic of Bulgaria;
* Coordination Council for the Management of European Union Funds for the Coordination of Measures for the Implementation of the State Policy for the Economic, Social and Territorial Development of the Country. However, this Council has not met for 2 years[[73]](#footnote-74) .
* A central coordinating unit is actively involved in all stages of preparation and programming of the ISF.
* Audit Authority (AA): the AA is equidistant from all European funds and has the necessary administrative capacity and independence to be able to exercise real independent scrutiny of programme implementation. To date, no audits have yet been carried out on the ISF operations due to their early stage. This is a positive development following the Court of Auditors finding of systemic errors in the previous Audit Authority's (Ministry of Interior’s Internal Audit Unit) operations, which resulted in a flat financial correction of 10% being imposed on the ISF 2014-2020 programme for financial years 2021 and 2022.

At the programme level, control is carried out by (1) the ISF Monitoring Committee, (2) the Audit Authority (AAC), and (3) the Managing Authority (MA).

MA activities are carried out in accordance with the rules and procedures laid down in Regulation (EU) 2021/1060 and the Financial Regulation, Decree No 23 of 13 February 2023 laying down detailed rules for the implementation of grants under programmes financed by the European Funds under shared management for the programming period 2021-2027.

In order to avoid conflicts of interest within the MA and to comply fully with the principles of sound financial management, the MA shall ensure the separation of functions through separate structural units and functional responsibilities:

* Programming of activities is carried out by the Programmes and Projects Unit, with separate teams with separate functional responsibilities for 'programming support' and 'project and procurement selection'.
* Preliminary Control and Irregularities" controls the award of grants according to the procedure described in Annex 3 of the Monitoring and Verification Procedures..
* Verification of expenditure on awarded projects is carried out by the Monitoring, Verification and Payment Unit", where the activities "technical verification" and "financial verification and accounting" are carried out by separate teams. Verification of technical assistance expenditure including administrative and on-the-spot checks shall be carried out by a legal or natural person functionally independent of the MA

In addition, the principle of *division of duties* is applied so that one staff member is not responsible for more than one task - authorising, making payment or accounting for it - in the programmes' accounts. These activities must be carried out under the supervision of another MA staff member.

The following observations can be made with regard to the rules envisaged for the different MA functions:

* **Selection of operations**: the methodology for selecting operations has been approved by the Monitoring Committee. Sufficient procedures and guarantees for the objectivity of the process are included.
* **Verifications in the verification process** are based on risk assessment and are proportionate to the risks identified in advance and in writing. [[74]](#footnote-75)
* **The administrative checks** on payment claims shall also include ex-post control of the procedures for the designation of the contractor, the MA may at its discretion carry out a sample check of the documents before the announcement of the procedures for the designation of the contractor by the beneficiaries. The mandatory pre-selection criteria do not include the procedures referred to in Article 18(1)(a) of Regulation (EC) No 1605/2002. 1(13) of the Public Procurement Act (direct negotiation), but only points 8, 9 and 10.
* It is foreseen to hold regular project progress monitoring meetings in face-to-face or online format with the beneficiaries and to submit reports (Annex 8, Project Monitoring Procedure). At its discretion, the MA has the possibility to organise additional meetings with specific beneficiaries.
* **The procedures for risk assessment as well as** detection of irregularities are defined by the EC.

**Administrative burden**

In the programming period 2021-2027, the applicable rules for the European Structural Funds under shared management apply for the first time to the ISF programme. At national level, this means that the regulatory framework applicable to the management, implementation and monitoring of EU funds is fully applied. Although this framework includes some new administrative elements for the MA, to a greater extent the application of the generally applicable provisions has led to a facilitation of its work.[[75]](#footnote-76) The national regulatory framework applicable to the European Structural Funds has been developed on the basis of the long experience of several MAs in managing funds and the MA of the ISF programme can rely on their extensive experience.[[76]](#footnote-77) A new feature for MAs will be the reporting to the CDC on the progress of the programme, but in view of the frequency of reporting this progress to the EC, this national obligation is unlikely to increase the administrative burden for the MA.[[77]](#footnote-78)

Based on their experience of applying for projects under the ISF programme, beneficiaries considered that the administrative burden was comparable to that during the previous programming period and that under other financial instruments.[[78]](#footnote-79) In terms of the equipment to be purchased, a fairly high level of detail was required, but this requirement greatly facilitated the preparation of the tender documentation and therefore the implementation of the project.[[79]](#footnote-80) Some of the beneficiaries considered that the evaluation committees did not have sufficient knowledge of the practical side of the work of their departments.[[80]](#footnote-81) Therefore, the committees sometimes request clarifications from the beneficiaries on issues related to this specificity of the work of the departments. Beneficiaries disagree on whether there is 'gold-plating' at national level, i.e. requirements to be interpreted more restrictively than the legal basis or the relevant documents providing methodological advice to Member States. Some of them acknowledge that the legislation related to tendering in the country is quite demanding. Others consider that certain requirements related to tendering procedures, such as ex-ante controls, actually support their work as they receive assurances that there will be no problems after the procedures.

### To what extent is further simplification achievable and how?

Beneficiaries and MAs were unanimous that the MMIS significantly facilitates the exchange of information between them. It is a system that has been used for another programming period and to a large extent any problems related to its functioning have been eliminated.[[81]](#footnote-82) In addition, the functionalities of the MMIS are constantly being improved and the MA and beneficiaries are always kept informed of these improvements.[[82]](#footnote-83) The only problem mentioned by the beneficiaries is that the information they enter in the MMIS has to be duplicated in the internal document flow of their institution.[[83]](#footnote-84) This is largely related to the internal rules of the beneficiary institution and not relevant to the requirements at EU level.

There is only one specific action under the programme for which simplified cost options are used - "Strengthening International Cooperation (Costa del Sol European Task Force)". The approval of the intervention at national level has greatly hampered both the Managing Authority and the beneficiaries.[[84]](#footnote-85) The Managing Authority has no experience with the application of simplified cost options and hopes that the European Commission will provide guidance in this direction as this is a measure that has the potential to reduce the administrative burden.[[85]](#footnote-86) To a large extent, the internal regulations of security sector departments are not adapted to the use of measures such as simplified cost options.[[86]](#footnote-87) In this case, the internal rules on secondment of staff had to be modified in order to be able to use the rate provided for in the specific action.[[87]](#footnote-88)

## Coherence and complementary

The coherence assessment includes a review and analysis of how well the different activities and priorities of the national programmes are compatible and work together. The examination of internal coherence will include an examination of how the different components of interventions work together to achieve programme objectives, including coherence between measures and the specific objective, and between policy and specific objectives.

### To what extent is the programme aligned with the initiatives supported by its policy area, in particular with the support under thematic mechanisms in the different governance regimes?

The Managing Authority actively monitors the implementation of the Thematic Mechanism and other programmes directly managed by the European Commission. The website of the Managing Authority and of the ISF Programme has a section dedicated to the Thematic Mechanism, where information on open calls for proposals under the Thematic Mechanism or other programmes directly managed by the EC is published.[[88]](#footnote-89) Information on funding opportunities under the Thematic Mechanism is actively monitored by potential beneficiaries in Bulgaria.[[89]](#footnote-90) At the moment, no beneficiary of the ISF programme has applied under the Thematic Mechanism and the Programme Managing Authority will be informed if this happens.[[90]](#footnote-91)

Currently, there is no approved project that requires inter-agency cooperation between the different security structures in the country. The activities to be carried out by the SANS under the ISF also directly address the needs of the Ministry of Interior, as they can legally request the SANS to carry out operational search and operational technical activities and the production of physical evidence. [[91]](#footnote-92)

### To what extent is the programme coherent with other EU funds (including other home affairs funds), in particular with EU external action?

The Council of Ministers' Decree No 302 on the establishment of a Partnership Agreement Monitoring Committee and Monitoring Committees for each of the EU funds managed under shared management introduced mechanisms at national level for effective coordination between the different financial instruments. Coordination is ensured through the participation of representatives of the MAs of all programmes financed by EFSM in the Monitoring Committees. In this way, the aim is to maximise the impact of assistance in close and similar thematic areas. Similar logic was applied at the programming stage in determining the composition of the thematic working groups. However, the programming took place in a COVID-19 environment with the TWG meetings being conducted online, which may have had an impact on the quality of discussions on potential complementarities between programmes.[[92]](#footnote-93)

In practice, for the first programming period, representatives of the ISF MAs participate in the MCs of the other programmes, and for the first time there are representatives of other MAs in the MCs of the ISF and BMVI programmes.[[93]](#footnote-94) In this sense, according to representatives of the Central Coordination Unit, there is still potential to seek complementarity between the different programmes, but experience will need to be gained in this respect.[[94]](#footnote-95) The regular meetings of the Monitoring Committees will contribute to the MA looking for complementarities between their interventions.[[95]](#footnote-96) It is also important to note that the ISF MA is also managing other financial instruments such as the Norwegian Financial Mechanism 2014-2021 and the Swiss-Bulgarian Cooperation Programme. In this respect, it has gained considerable experience in seeking complementarities between interventions funded under different financial instruments.[[96]](#footnote-97) The designation of the European Union Audit Executive Agency as audit authority for the programme also introduces a unified approach to the management of EU funds and coordination between the responsible institutions at national level.[[97]](#footnote-98)

According to the annual progress report on the implementation of the ISF programme for 2023. The Managing Authority actively ensures that the objectives and activities of the programme are consistent with other forms of support and that there is no overlap with other programmes. The ISF Programme will ensure complementarity and synergy with the programmes in the Partnership Agreement and in particular with[[98]](#footnote-99) :

* Programme for Research, Innovation and Digitisation for Intelligent Transformation (PRIDIT) - The ISF programme will support measures to establish, develop modernise and maintain security information systems; prevent and combat cybercrime; and effectively manage security risks and crises. Measures related to other elements of cybersecurity are outside the scope of support of the FSF programme;
* INTERREG VI-A IPA Bulgaria Serbia - Internal Security Fund for the period 2021-2027 will support measures in the field of protection of public spaces and critical infrastructure in relation to cross-border, serious and organised crime and terrorism, including preparedness and countering CBRN-E threats. Risk management and response to natural disasters and crises are outside the scope of the FHS.
* INTERREG VI-A Bulgaria-Turkey IPA - There is complementarity with the strategic project under INTERREG specific objective 2: A safer and more secure Europe. The dividing lines can be seen in the different types of beneficiaries - the beneficiaries of the ISF are mainly administrative structures at central level.
* Action under the Cybercrime ISF will complement the support that can be provided under the Digital Europe programme in the area of cyber security. The ISF will address cyber-dependent crime and cyber-enabled crime, i.e. traditional crime whose scale or scope can be increased by the use of ICT. Action to protect victims of crime under the ISF will complement the Rights and Values programme, which will support action to protect and promote the rights of the child.
* In addition, the ISF Programme will ensure complementarity and synergy with the Recovery and Resilience Plan and in particular with the following projects: Anti-corruption measures to be supported under the Recovery and Resilience Plan will not be funded under the ISF. Measures related to the management of risks and responses to natural disasters and crises, the prevention of and response to conventional crime, the maintenance of public order at national level, as well as the facilitation of citizens' access to public services and other elements of e-government are not covered by the support of the ISF. With regard to the 'Establishment, development and optimisation of the TETRA digital system and radio relay network', actions related to the maintenance of the already established TETRA system are foreseen for funding under the ISF. Actions related to the development of the TETRA system are not foreseen for funding under the ISF.

## Added value for the EU

EU added value seeks changes that result from EU support, in addition to expected national actions. The added value of EU funding is analysed in terms of whether actions have been funded that would not otherwise have taken place, or would not have taken place on such a scale or in such a timely manner.

### To what extent does the programme generate EU added value?

To a very large extent, the interventions to be implemented by the ISF programme would not have happened unless they were included as priorities of the Fund and European funding is secured for them.[[99]](#footnote-100) The exceptions are interventions that involve operational support, or the absence of which would seriously compromise national security, for which national funding is likely to be secured if European funding is not available.[[100]](#footnote-101) In such cases, there is a substitution effect between national and European funding.[[101]](#footnote-102) In any case, securing the funds under the national budget would have made it more difficult for the beneficiaries and had economic consequences for them in other areas.[[102]](#footnote-103) One of the beneficiaries mentioned that the national budget very rarely funds interventions like the one implemented under ISF, which would significantly increase their effectiveness in organised crime investigations, with much fewer human resources and on a faster order of magnitude.[[103]](#footnote-104) Support for cross-border cooperation clearly has the greatest added value for the EU, as it supports the investigation of international organised crime, which no single country has the capacity to investigate on its own. There is EU added value in each of the interventions as they directly or indirectly contribute to the priorities and measures set out in strategic documents at European level, such as the EC Strategy against Organised Crime 2021-2025.

The experience of the beneficiaries so far shows that the partnerships established in the framework of activities supported by the ISF continue in the future and can be used in other investigations. However, at this point in time, the stage of implementation of the USF programme does not allow to assess whether there are effects of the scope of the assistance, i.e. for additional target groups or additional types of interventions or effects of scale.

# Conclusions and recommendations

## Conclusions

The Managing Authority of Bulgaria's PVF programme has made efforts to ensure consistency between the country's needs in the homeland security sector and the priorities and measures set out in the PVF programme. The programme has been developed through a bottom-up approach where beneficiaries themselves identify, formulate and prioritise their needs. Furthermore, the actual development of the programme has taken place in partnership with all stakeholders within the Thematic Working Group. Many of the prospective beneficiaries of the programme had to prioritise their needs in order to comply with the resources available for Bulgaria under the USF and the rules on eligible funding percentages for certain types of activities. By the end of 2023, no events have occurred that would require changes to the ISF programme.

The level of implementation of the 2021-2027 FHS programme is moderate. A good level of contracting has been achieved, but there are no disbursements under the programme at the end of 2023. The initial delay in the start-up of the programme can be overcome and does not at this stage jeopardise the achievement of the set objectives. A risk factor for the implementation rate is the delay in tendering for procurement of goods and services for the project. A large number of beneficiaries have started the preparation of tender documents in a timely manner, but ex-ante controls on some contracts, the time limits set in the Public Procurement Act and potential appeals against the decisions of the procedures may lead to delays.

By the end of 2023, the approved projects under the ISF programme have set targets for output and outcome indicators that, if implemented, would lead to the achievement of most of the intermediate and final targets for these indicators. Regular reporting of indicator data by the beneficiaries will allow the Managing Authority to identify potential problems in meeting the programme targets in a timely manner and, together with the beneficiaries, to take measures to overcome the problems.

The Managing Authority has set up a system of strict control over the cost-effectiveness of the implemented activities, both at the stage of application with a project proposal and during the implementation of the interventions. The administrative burden of the programme is moderate for both beneficiaries and the Managing Authority and comparable to that of the transitional programming period and other financial instruments. Simplification of rules is mainly possible under part of the national legal framework and beneficiaries' internal rules.

At national level, mechanisms are in place to ensure effective coordination between programmes financed by EU funds managed under shared management. The Managing Authority actively ensures that the objectives and activities of the programme are consistent with other forms of support and that there is no overlap with other programmes. With the participation of the MA of the ISF programme in Monitoring Committees of other EU-funded programmes, there is potential to seek further synergies between the interventions of the different programmes. Application opportunities under the Thematic Mechanism and other programmes directly managed by the European Commission are monitored by both the Managing Authority and potential beneficiaries. However, at the end of 2023, no Bulgarian institution has applied for support under the Thematic Mechanism.

There is EU added value in each of the interventions, as they contribute directly or indirectly to the priorities and measures set out in strategic documents at European level, such as the EC Strategy on Combating Organised Crime 2021-2025.

## Recommendations

The recommendations developed are intended to support the next stage of implementation of the ISF programme. The recommendations are addressed both to the Managing Authority - the International Projects Directorate of the Ministry of Interior and to the beneficiaries/members of the Monitoring Committees that discuss and adopt changes to the National Programmes and other relevant legislation.

### Programming and implementation

**Inclusion of additional priorities:** In case of release of funds due to a change of the Programme or an increase of financial resources after the mid-term review, the possibility of funding operations that will address national or European strategic priorities not currently covered by operations may be considered. These could include:

* Countering crime across the state border / investigating illegal migration (where a potential target group would be the operational group of the GDBP). This target could potentially also be addressed by the BMVI programme.
* In view of the abolition of border controls at internal air and sea borders, and in the near future also at the borders with Greece and Romania, operations focused on compensatory measures could be supported.

### Horizontal measures

**Developing capacities to implement cross-cutting principles:** although there are instructions and organization to apply cross-cutting principles (respect for human rights, respect for the interests of vulnerable groups, non-discrimination, decarbonization), they may not be sufficient to implement these principles in practice. This is partly due to the lack of established practices along these lines in the MoI and other beneficiary institutions. To achieve better results, additional measures could include: (1) exchanging experiences with institutions or programme management bodies that have more substantial experience (e.g. Education or Human Resources Programmes); (2) practical training with external specialists; (3) bringing in consultants to support these processes in developing procurement activities or specifications (e.g. for construction or renovation works).

### Monitoring and reporting

**Use of good practices for simplification of administrative burden applied by MAs of other EU funds programmes under shared management**. Meetings could be held with MAs of other programmes to discuss what activities and how they apply simplified cost options, or what other measures they have taken to reduce the administrative burden for beneficiaries.

**Simplification of the reporting process through timesheets**. One opportunity for simplification would be if a single rate for project management and coordination were adopted. In this way, the staff who carry out project activities could receive a flat rate. It could also be determined based on analysis from past projects.

### Communication strategy

**More targeted and large-scale communication through social media:** the planned communication activities for the already approved operations are few and do not reach the general public sufficiently. Communication activities via social media (Facebook) are only carried out by the IPD.

The ISF funds are substantial and allow for a better thought out social media communication strategy to reach the general public in Bulgaria. The messages that will reach the general public will have many positives:

* increased confidence in the Ministry of Interior and law enforcement agencies;
* increased trust in the EU and the principles of solidarity, the understanding that the fight against organised crime and terrorism is a common effort and responsibility;
* increased sense of security for citizens, understanding the investments being made.

Beneficiaries should be encouraged to invest in social media messaging rather than different types of stationery to the extent that the specifics of their tasks and projects allow, such as:

* Use the right forms of communication (purposefully developed videos) for key operations;
* Expand the range of communication channels used (besides Facebook, Instagram, X, Youtube, media partnerships);
* They target messages to specific audiences (e.g. citizens in areas close to the border with Turkey, or those whose social profile is "Eurosceptic").

### Control and management systems

Regarding the control and management systems, some possible improvements could be discussed, such as:

* In Annex 6: *Methodology for establishing criteria on the basis of which the Preliminary Control and Irregularities Department carries out preliminary control of public procurement and procedures carried out* under Chapter Four of the Public Procurement Act, it is provided that the MA carries out preliminary control of procedures under Article 18, par. 8, 9 and 10 of the Public Procurement Act. Paragraph 13 (direct contracting) could also be added. Again, control could be foreseen where there is only 1 candidate (before a contract is concluded).
* Clearer criteria could be set for when the regular project progress monitoring meetings are held - e.g. when there are certain milestones in implementation progress (Annex 8, Project Monitoring Procedure).
* With regard to verification, the checks in the verification process shall be based on a risk assessment and shall be proportionate to the risks identified in advance and in writing.

1. Analytical framework

|  |  |
| --- | --- |
| **RELEVANCE** | |
| **Evaluation question** | **Indicative assessment criteria** |
| To what extent does the programme respond to evolving needs? | * The stakeholders of the programme are correctly identified in accordance with the objectives set out in the legal basis. * The needs analysis that led to the definition of the programme and the associated allocation of resources is consistent with the respective current and future needs of the relevant stakeholders. * The strategy developed to meet these needs, which is expressed in specific milestones and targets, aims to meet the most critical needs with proportionate resources. * The list of implementation measures included in the legal basis and planned under the programme is appropriate to meet the current and future needs of the target groups. * The work programme addresses the main priority needs and key target groups. |
| * To what extent can the programme adapt to changing needs? | * The needs assessment shall be carried out and updated regularly or as relevant contextual changes occur. * Monitoring Committee able to provide timely information on changing needs * There is a sufficient degree of flexibility in the design of interventions. * Where necessary, minor changes to the programme can be implemented quickly. * Policies and procedures are in place to ensure that significant program adjustments can be made in a timely manner if new needs arise. * If needs have changed since the adoption of the programme, programme interventions have been adapted in a timely manner or new needs have been adequately addressed through other instruments. * Procurement procedures ensure flexibility and bottom-up feedback. |
| **EFFECTIVENESS** | |
| * To what extent is the programme on track to achieve its objectives? | * Implementation has started with the operations selected for programme support under all relevant specific objectives and types of intervention, except where a delayed start is planned. * The early progress in achieving milestones and targets, taking into account the timing of programme adoption, is in line with expectations. * Challenges that affect performance and progress towards the Fund's objectives are properly identified and linked to effective remediation strategies. * The programme supports the types of interventions and types of actions known to be effective according to the available evidence * The Fund shall make use of available good practices where appropriate and possible. |
| * To what extent is the monitoring and evaluation framework appropriate to inform progress towards programme objectives? | * A robust electronic data exchange system is in place to record and store monitoring and evaluation data. * The data recorded in the system is reliable. * Monitoring requirements are properly understood by participants in the data submission process and training or information sessions are arranged as necessary. * The reporting of the performance indicators correctly reflects the level of performance on the ground (no over- or under-reporting). * The common indicators reflect the main achievements of the programme in line with the intervention logic of the programme. * Programme-specific indicators are used to fill any significant gaps in the general indicators based on the programme's intervention logic. * The comprehensive set of data recorded provides sufficient evidence to use as a basis for evaluating the impact of the funds, thus paving the way for subsequent evaluation. |
| * How was the involvement of relevant partners ensured at all stages of programming, implementation, monitoring and evaluation? | * There is a strategy to identify, inform and reach the most appropriate partners, which aims to ensure their balanced representation in the IPs. * Relevant partners are identified and involved at the programming stage. * The relevant partners shall participate in the MC in accordance with their role as defined in the relevant rules of procedure. * Actions have been put in place to allow partners to be involved at all stages of the programme cycle. |
| * To what extent does the programme respect or promote horizontal principles in its implementation? | * Appropriate organisational and procedural measures are in place to ensure compliance with the EU Charter of Fundamental Rights in the implementation of the programme - Article 9(1). * Appropriate organisational and procedural measures are in place to ensure that appropriate steps are taken to take into account and promote gender equality and gender mainstreaming at all stages of the preparation, implementation, monitoring, reporting and evaluation of the Fund - Article 9(2) * Appropriate organisational and procedural arrangements are in place to enable appropriate steps to be taken to prevent discrimination on all grounds and at all stages of the programme cycle - Art. 9(3) * The Programme has appropriate mechanisms in place to ensure that implementation is consistent with the objective of promoting sustainable development as set out in Article 11 TFEU, taking into account the UN Sustainable Development Goals, the Paris Agreement and the principle of 'no significant harm' - Article 9(4). |
| * How effective is the program in communicating and disseminating its capabilities as well as accomplishments? | * A communication strategy is in place with properly defined target groups and appropriate monitoring measures, including appropriate and measurable targets for communication activities. * Dissemination activities reach the target audience and are carried out through an appropriate mix of communication channels and platforms, including social media, and generate interactions. * Funding opportunities are advertised appropriately and reach the identified target group of potential beneficiaries. |
| **EFFICIENCY** | |
| * To what extent does the programme support cost-effective measures? | * The Fund supports the types of interventions that are known to be cost-effective, based on available evidence. * Initial data from operations show that unit costs are in line with or below existing benchmarks and estimates. * Differences in unit costs between similar operations within the same programme can be explained and justified * For very specific, urgent or innovative actions, appropriate mechanisms exist to ensure that cost-effectiveness is considered as a criterion for beneficiary selection. |
| * How effective is the management and control system? | * The management and control system described in accordance with the legal basis is designed to ensure the effectiveness of the selection of operations, management tasks, the operation of the IP, the implementation of anti-fraud measures and procedures, the performance of the accounting function and the recording and storage of data for each operation. * The administrative burden is proportionate for all implementers (managing authorities, intermediate bodies) compared to the previous programming period/ similar services offered to comparable target groups without programme support. * The administrative burden is proportionate for all beneficiaries compared to the previous programming period/ similar services offered to comparable target groups without programme support. * The administrative burden is proportionate for all end-users, e.g. compared to the previous programming period/ similar services offered to comparable target groups without programme support. * Absence of 'gold-plating' at national level (e.g. by managing authorities, intermediate bodies, national audit authorities), i.e. requirements are not interpreted more restrictively than the legal basis or relevant documents providing methodological advice to Member States, unless there is good reason. * Absence of "gold plating" at EU level, i.e. requirements are not interpreted more restrictively than those in the legal basis and unless there is good reason. * The simplified cost options used lead to simplification on the ground. * Technical assistance shall be used to strengthen the command and control system where necessary. |
| * To what extent is further simplification achievable and how? | * There is evidence of legal requirements, procedural rules or practices that create a disproportionate administrative burden at EU or Member State level and there are concrete alternatives. * There is the option to additionally use simplified cost and financing options that are not linked to cost options. * There is evidence of a lack of coordination between the actors involved in the implementation of the Fund, leading, for example, to a lack of coherence, increased administrative burden, etc. * There are problems with electronic data interchange systems that cause delays and can and should be addressed. |
| **COHERENCE AND COMPLEMENTARITY** | |
| * To what extent is the programme aligned with the initiatives supported by its policy area, in particular with the support under thematic mechanism in different governance regimes? | * Structures, organisational arrangements or coordination mechanisms are in place to ensure coordination, complementarity and, where appropriate, synergies between different ways of managing the same programme. * Coordination mechanisms and arrangements are used regularly and to good effect. * The alleged overlap is in fact justified for objective reasons (e.g. same target group but different type of measure/different need being addressed/different readiness for the type of financial support chosen) * The programme is aligned with ongoing policy agendas at EU and national level. * There is evidence of inter-agency cooperation |
| * To what extent is the programme coherent with other EU funds (including other home affairs funds), in particular with EU external action? | * Structures, organisational arrangements or coordination mechanisms are in place to ensure coordination, complementarity and, where appropriate, synergies between other EU funds, in particular cohesion policy and EU external action. * Coordination mechanisms and arrangements are used regularly and to good effect. * The alleged overlap is in fact justified for objective reasons (e.g. same target group but different type of measure/different need being addressed/different readiness for the type of financial support chosen) * The programme offers support for cross-cutting policy programmes, complementing support offered by other EU funds. |
| **EU ADDED VALUE** | |
| * To what extent does the programme generate EU added value? | * The Fund focuses on areas, interventions and target groups where results at EU level can go beyond what Member States can achieve acting alone. * There is evidence of reach effects, i.e. additional target groups or additional types of interventions. * There is evidence of economies of scale, i.e. greater volume of services/end users. * There is evidence of functional effects, i.e. training and increased capacity to manage the delivery of public support within the participating administrations. |

1. Methodology and tools for data collection
   1. Questionnaire to responsible institutions (MA, CCU)
      1. Relevance
2. **To what extent does the programme respond to evolving needs in the field of homeland security?**
   1. How was the needs analysis carried out in the preparation of the programme? To what extent is this analysis in line with current stakeholder needs?
   2. What was the stakeholder identification process? Were there stakeholders that were overlooked in the identification of needs and resource allocation? Are there stakeholders to whom the resource allocation does not meet their current needs?
   3. What was the resource allocation process? How were the most essential needs identified and how did the programme ensure that proportionate resources were used to meet those most essential needs?
   4. What is the process of developing the annual work programmes for the implementation of the ISF programme? How to ensure that it meets the highest priority needs
3. To what extent are national needs reflected in your ISF programme?
   1. To what extent do you believe that national strategic needs, problems and issues are correctly identified in the ISF programme?
   2. The extent to which **the objectives and measures** set out in Regulation 2021/1149 are relevant and important against the background of national needs. Please specify the relevance and importance of each specific objective under the Regulation at national level in the light of current needs:
      1. improving and facilitating the exchange of information between and within competent authorities and relevant Union bodies, offices and agencies and, where applicable, with third countries and international organisations;
      2. improving and intensifying cross-border cooperation, including joint operations between competent authorities in relation to terrorism and serious and organised crime with a cross-border dimension; and
      3. support for strengthening the capacity of Member States to prevent and combat crime, terrorism and radicalisation, as well as to manage security incidents, risks and crises, including through enhanced cooperation between public authorities, relevant Union bodies, services or agencies, civil society and private partners in the different Member States.
4. To what extent do you consider that the **eligible actions** identified in Annex 3 of Regulation 2021/1149 are appropriate to achieve the objectives of the Fund and the Programme? Are there any actions that are not eligible but would contribute to achieving the objectives of the Fund and the Programme?
5. **To what extent can the ISF programme adapt to changing needs?**
   1. Is the needs assessment updated regularly or when contextual changes occur?
   2. What is the role of the Monitoring Committee in assessing changing needs? Should it provide information on changing needs? How is the work of the Committee organized in this regard?
   3. What is the intervention design process? Does it ensure sufficient flexibility to respond to changing needs? Is the Monitoring Committee involved in this process?
   4. Have any changes been made to the programme so far? If yes, what were they and what made them necessary?
   5. What is the procedure for changing the programme? Can minor changes be easily agreed with the Monitoring Committee and the European Commission? Where substantial adjustments are involved, to what extent can changes be made in a timely manner?
   6. What changes in needs have occurred since the adoption of the programme? Have these needs been met by adapting programme interventions or will these needs be met through other instruments?
   7. How do procurement procedures affect the flexibility of the programme?
      1. Effectiveness
6. Considering the programme's performance to date and the plan for further implementation, to what extent is the ISF programme likely to achieve its following outlined objectives:
   1. improving and facilitating the exchange of information between and within competent authorities and relevant Union bodies, offices and agencies and, where applicable, with third countries and international organisations;
   2. improving and intensifying cross-border cooperation, including joint operations between competent authorities in relation to terrorism and serious and organised crime with a cross-border dimension; and
   3. support for strengthening the capacity of Member States to prevent and combat crime, terrorism and radicalisation, as well as to manage security incidents, risks and crises, including through enhanced cooperation between public authorities, relevant Union bodies, services or agencies, civil society and private partners in the different Member States.
7. Has the implementation of operations started for all the specific objectives and types of interventions outlined in the programme? Has the annual plan for 2023 been fully implemented?
   1. Is there a delay in any of the specific objectives outlined in the programme? If so, is there a plan to overcome this delay?
8. In terms of the milestones and targets for the programme indicators, is the implementation of the programme on track? If there are any delays, is there a plan to overcome them?
9. What challenges to programme implementation and progress on its objectives have been identified? Is there a strategy in place to address them? If so, what is it?
10. Does the programme support interventions that are based on good practice and for which there is evidence that they are sufficiently effective? Where possible, does the programme make use of good practices identified in previous periods by Bulgaria or other countries?
11. Considering the implementation of the programme to date, to what extent has the monitoring and evaluation framework been supportive in monitoring progress towards achieving the programme objectives?
    1. Does an electronic data exchange system allow for effective recording and storage of monitoring and evaluation data? How can this electronic data exchange system be improved?
    2. How reliable is the data recorded in the system? Who can enter and edit data in the system? Does the system have any systematic checks on the reliability of the data?
    3. Have training or information days been held on reporting and data provision? If not, how is awareness of process requirements ensured for data submission participants? If yes, who were the participants in these trainings and what proportion of the participants in the data submission process were trained?
    4. What are the mechanisms in the monitoring and evaluation framework to ensure that the reporting of results does not over- or underestimate the indicator values?
    5. Do the overall programme indicators reflect the main achievements of the programme in line with the intervention logic of the programme? Do the programme-specific indicators fill significant gaps in the common indicators?
    6. To what extent does the overall set of recorded data on programme performance give you an insight into programme performance and impact?
12. How was the participation of relevant stakeholders ensured at all stages of programming, implementation, monitoring and evaluation?
    1. Is there a strategy for identifying, informing and reaching the most appropriate partners that aims to ensure their balanced representation in the Monitoring Committee?
    2. Were the identified stakeholders involved at the programming stage?
13. To what extent does the PVF programme respect or promote cross-cutting principles in its implementation?
    1. Are organisational and procedural measures in place to ensure compliance with the EU Charter of Fundamental Rights in the implementation of the programme?
    2. Are organisational and procedural measures in place to ensure gender equality and gender mainstreaming at all stages of programme preparation, implementation, monitoring, reporting and evaluation?
    3. Are organisational and procedural measures in place to ensure that discrimination is prevented on all grounds and at all stages of the programme cycle?
    4. Are organisational and procedural measures in place to promote sustainable development and the principle of 'no significant harm'?
14. To what extent has the ISF program been effective in communicating and disseminating its capabilities as well as accomplishments?
    1. Has the programme's communication strategy identified target audiences and relevant monitoring measures, including appropriate and measurable targets for communication activities?
    2. Does sufficient information about funding opportunities reach the identified target group of potential beneficiaries?
       1. Efficiency
15. In your opinion, are the planned outputs and outcomes set out in the national programmes likely to be achieved/realised within the timeframe and budget?
16. How do you ensure that there is no "substitution effect" of national funding with programme funds?
17. To what extent does the programme seek to support the types of interventions that have proven to be cost-effective?
18. Given the current performance of the ISF programme, are the unit costs in line with existing benchmarks? Can differences in unit costs between similar operations within the same programme be explained and justified?
19. How effective is the management and control system?
    1. Does the management and control system ensure effectiveness in the selection of operations, management tasks, the operation of the Monitoring Committee, the implementation of anti-fraud measures and procedures, the performance of the accounting function and the recording and storage of data for each operation?
    2. How would you define the administrative burden for you as [Managing Authority] of the programme compared to the previous programming period or to other financial instruments? Is it more or less and what are the factors that have influenced the administrative burden in this programming period?
    3. How would you define the administrative burden for beneficiaries of the programme compared to the previous programming period or to other financial instruments? Is it more or less and what are the factors that have influenced the administrative burden in this programming period?
    4. Is there 'gold-plating' at national level, i.e. requirements to be interpreted more restrictively than the legal basis or relevant documents providing methodological advice to Member States, unless there is good reason?
    5. Are simplified cost options used? Does this lead to simplification of programme implementation and reporting?
    6. Has technical assistance been used to strengthen the management and control system? Please describe what technical assistance has been used for so far?
20. To what extent is further simplification of the programme implementation and reporting rules achievable and how?
    1. Are there specific legal requirements, procedural rules or practices that create a disproportionate administrative burden in implementing the programme, and are there alternatives?
    2. Is there a possibility of further use of simplified cost options and funding that is not linked to cost options?
    3. Has there been a lack of coordination between those involved in the implementation of the programme, leading to a lack of coherence, increased administrative burden, etc.?
    4. Are there problems with electronic data interchange systems that are causing delays and can and should be resolved?
       1. Coherence and complementarity
21. To what extent is the programme coherent with the initiatives supporting its field of action, in particular the support under the Thematic Mechanism and other programmes directly managed by the European Commission?
    1. Are you familiar with the Union actions funded under the ISF under direct management that are implemented in your Member State? To what extent are Union actions financed under the ISF taken into account in the preparation of national programmes in your Member State?
    2. What structures or organisational arrangements or coordination mechanisms are in place to ensure coordination, complementarity and, where appropriate, synergies between the different ways of managing the Fund?
    3. Are these structures/arrangements/coordination mechanisms used regularly? Can you give examples?
    4. Is the ISF programme aligned with current policy agendas at EU level, with international actions and programmes, and with national level programmes? Can you give examples.
    5. Can you give examples of inter-agency cooperation?
22. To what extent is the ISF programme coherent with other EU funds (including other home affairs funds), in particular EU external action?
    1. What structures or organisational arrangements or coordination mechanisms exist to ensure coordination, complementarity and, where appropriate, synergies between other EU funds (including other home affairs funds), and with EU external action?
    2. Are these structures/arrangements/coordination mechanisms used regularly? Can you give examples?
    3. Are you familiar with the activities/actions carried out by EU funded networks (e.g. ATLAS, ENFSI, TISPOL, RAILPOL, etc.)? Are networks included in national programmes and considered at national level?
23. Regarding the internal coherence of the programme, have you encountered activities implemented within the programme that reinforce each other and contribute to the overall objectives of the programme? Please give examples.
    * 1. EU added value
24. If there was no funding from the HLF, do you think the same results would have been achieved through alternative funding routes (e.g. national, international funding)? Please explain.
25. What is the added value of the PVF programme compared to existing national programmes and policies and in terms of the national budget?
    * 1. Final questions
26. Would you like to share any other information with us?
27. Do you have additional sources of information or contact details you would like to share with us?
    1. Questionnaire to beneficiaries
       1. Relevance
28. **To what extent does the project you are implementing under the ISF/ AMIF/BMVI meet the needs of your institution?**
    1. What are the needs that your ISF/ AMIF/BMVI project seeks to address?
    2. Are these needs linked to identified needs and priorities in a national strategy and plans for their implementation? Which strategy (e.g. Crime Prevention Strategy 2021-2030; Updated National Security Strategy; National Strategy for Integrated Border Management in the Republic of Bulgaria 2020-2025; National Strategy on Migration of the Republic of Bulgaria 2021-2025, National Strategy for Disaster Risk Reduction on the Territory of the Republic of Bulgaria 2018-2030, National Strategy for the Prevention and Combating of Irregularities and Fraud Affecting the Financial Interests of the EU for the period 2021-2027)?
    3. Is your project based on a needs analysis of the institution? What did this analysis consist of?
    4. What was the resource allocation process? How were the most essential needs identified and how did the project ensure that proportionate resources were used to meet those most essential needs?
29. **To what extent are the needs of your institution reflected in the ISF/ BMVI/ FIMI programme?** 
    1. Is your institution involved in the programming process - identifying the programme objectives and priority measures? What did this participation consist of?
    2. Do the priorities reflect your needs? Are there needs that have not been reflected at all or insufficiently?
    3. To what extent do you consider that the eligible actions identified in Annex 3 of Regulation 2021/1149 / Regulation2021/1148 / Regulation2021/1147 are appropriate to achieve the objectives of the Fund and the Programme? Are there actions that are not eligible but would contribute to meeting your needs?
30. **Can your institution participate in discussions on pressing changes to the ISF/ AMIF/BMVI program to adapt to changing needs?**
    1. Do you participate in the Monitoring Committee? What is the role of the Monitoring Committee in assessing changing needs? Do you have to provide information on changing needs at the MC meetings? How is the work of the Committee organized in this regard?
    2. Do you think that the rules of the programme and the fund in general give any flexibility within the project? What project parameters can be changed?
    3. How do procurement procedures affect project flexibility?
       1. Effectiveness
31. **Considering the implementation of the project to date, to what extent is the project likely to achieve its outlined objectives and indicator targets?**
    1. If there is any delay, is there a plan to overcome it?
    2. What challenges to project implementation and progress on its objectives have been identified? Is there a strategy outlined to address them? If so, what is it?
32. **Does the project support activities that are based on good practice and for which there is evidence that they are sufficiently effective?** Does the programme make use, where possible, of good practices identified in previous periods by Bulgaria or other countries?
33. **Does the implementation of your project in any way promote the Fund's cross-cutting principles, which include respect for EU fundamental rights, gender equality, prevention of discrimination and sustainable development?**
    1. Will the procurement have criteria that take into account EU sustainable development policies, such as requirements for energy efficient construction, level of carbon emissions to be produced by the purchased vehicles? Does the programme have any requirements in this regard?
       1. Efficiency
34. **In your opinion, are the planned outputs and outcomes specified in the project likely to be achieved/realised within the timeframe and budget?**
35. **In some of the project activities, is there a "substitution effect" of national funding with ISF/AMIFBMVI programmes?**
36. **How would you define the administrative burden for beneficiaries of the programme compared to the previous programming period or to other financial instruments**?
    1. Is it more or less and what are the factors that influence the administrative burden in this programming period?
37. **How would you rate the following aspects of the application process for the procedure under which you received funding? If your assessment of any aspect is not satisfactory, please explain why.**
    1. The availability and clarity of instructions and guidelines to assist in the preparation of the application form
    2. The availability and added value of direct communications with the MA, if you have asked for clarification
    3. Avoiding redundancies in the application form (e.g. needing to provide the same information several times)
    4. The clarity of the information and the level of detail required in the application form
    5. Clarity of application steps and requirements
    6. Ability to complete and submit the application fully online
    7. The relevance and proportionality of the information required in the application form
38. **How would you rate the following aspects of your project performance reporting process? If your assessment of any aspect is not satisfactory, please explain why.**
    1. The availability and clarity of instructions and guidance given for reporting on the programme
    2. The availability and added value of direct communications with the MA, if you have asked for clarification
    3. The level of detail and relevance required in project reporting
    4. The ability to report the project fully online
39. **Is there 'gold-plating' at national level, i.e. requirements to be interpreted more restrictively than the legal basis or relevant documents providing methodological advice to Member States, unless there is good reason? Can you give an example?**
40. **In your project, are simplified cost options used? Does this lead to simplification of programme implementation and reporting?**
41. **To what extent is further simplification of project implementation and reporting rules achievable and how?**
    1. Are there specific legal requirements, procedural rules or practices that create a disproportionate administrative burden in implementing the programme, and are there alternatives?
    2. Is there a possibility to further use simplified cost options?
       1. Coherence and complementarity
42. **To what extent is your project aligned with other interventions supporting the same field of action under the ISF/ AMIF/BMVI?**
    1. Are you implementing any other project funded under another ISF/ AMIF/BMVI, e.g. under another programme procedure or the Thematic Mechanism?
    2. Are you familiar with the Union actions funded under the ISF under direct management that are implemented in your Member State?
    3. Are you involved in structures or organisational arrangements or coordination mechanisms that ensure coordination, complementarity and, where appropriate, synergies between different ways of managing the Fund?
    4. Can you give examples of inter-agency collaboration in the development of projects for interventions under the ISF/ AMIF/BMVI that are complementary in some way?
    5. Do you think your project is mutually reinforcing with other interventions in your or another institution's programme? Please provide examples.
43. **To what extent is the support you receive under this project coherent with other EU financial instruments and with EU external action?** 
    1. Are you involved in structures or organisational arrangements or coordination mechanisms that ensure coordination, complementarity and, where appropriate, synergies with other EU financial instruments?
    2. Are these structures/arrangements/coordination mechanisms used regularly? Can you give examples?
       1. EU added value
44. **If there was no funding from the ISF/ AMIF/BMVI, do you think your project activities would have been achieved through alternative means of funding (e.g. national, international funding)?** Please explain.
45. **What is the added value of the ISF/ AMIF/BMVI programme compared to existing national programmes and policies and in relation to the national budget?**
    * 1. Final questions
46. **Would you like to share any other information with us?**
47. **Do you have additional sources of information or contact details you would like to share with us?**
    1. Survey to end-users in the DGCS

| Routing | Q# | Question | Possible answers | Type of answer |
| --- | --- | --- | --- | --- |
| **Introduction:**  Welcome to this online survey, which supports the mid-term evaluation that PMG Analytics is conducting to assist the International Projects Directorate of the Ministry of the Interior in its work on Bulgaria's Homeland Security Fund 2021-2027 programme. You have been selected to participate in this study as your institution is one of the beneficiaries of the programme. The survey contains 10 questions and should not take you more than 15 minutes to complete.  **The survey is anonymous.** Your answers will be treated as confidential and only aggregated results will be reported in the survey. In addition, all information obtained in the context of this survey will be used only for the purpose for which it was requested. All personal data collected will be treated in accordance with Regulation (EU) 2018/1725.  Question from the consent form. | | | | |
| [All] |  | To what extent are you familiar with the support that the GDCOC receives under the Internal Security Fund 2021-2027? | * To a very large extent * To a large extent * In neither great nor small degree * To a small extent * To a very small extent | Radio button list, single selection |
| [All] | 2. | In view of the challenges you have faced in your workplace over the last three years, to what extent do you find the following objectives of the Internal Security Fund significant and worthy of priority?  i. improving and facilitating the exchange of information between and within competent authorities and relevant bodies in the European Union and, where applicable, with third countries and international organisations;  ii. improving and intensifying cross-border cooperation, including joint operations between competent authorities in relation to terrorism and serious and organised crime with a cross-border dimension;  iii. support for strengthening capacities to prevent and combat crime, terrorism and radicalisation, and to manage security incidents, risks and crises; | * To a very large extent * To a large extent * In neither great nor small degree * To a small extent * To a very small extent * Don't know / can't judge | Radio button list, single selection |
|  |  | What other objectives would you identify as priorities: | Text | Open answer |
| [All] | 3 | Given your experience, to what extent in your work do you identify a need for the following support for your unit to work effectively:   * Securing participation in cross-border operations * Ensuring participation in joint investigation teams * Ensuring the organisation, conduct and participation in international expert forums * Provision of vehicles to be used for investigative, search and cross-border operations and maintenance of existing vehicles * Ensuring participation in expert meetings/seminars/working visits for exchange of experience/joint exercises * Personal protection equipment (including tactical vests) * TETRA ( Terrestrial Trunked Radio) radio communication * IT equipment (including laptops, multifunction devices, stationary printers, external hard drives, desktop computers, monitors, computer configurations) | * To a very large extent * To a large extent * In neither great nor small degree * To a small extent * To a very small extent * Don't know / can't judge | Radio button list, single selection |
| [All] | 4 | In addition to those listed above, what other needs would you say should be met as a priority through European funding: | Text | Open answer |
| [All] | 7 | In view of its experience over the last three years, to what extent would the provision of costs for participation in cross-border operations and joint investigation teams contribute to the effectiveness of:   * Bulgarian participation in joint investigation teams and cross-border police cooperation within EMPACT * coordination and interaction and a more rapid exchange of experience, know-how and information related to joint investigations of serious and organised crime, including vehicle crime and corruption | * To a very large extent * To a large extent * In neither great nor small degree * To a small extent * To a very small extent * Don't know / can't judge | Radio button list, single selection |
| [All] | 8 | In view of its experience over the last three years, to what extent is it likely that the provision of costs for participation in cross-border operations and joint investigation teams, expert meetings/seminars/experience sharing/joint exercises will lead to:   * Increased trust at national and supranational level with partner law enforcement authorities; * Increased number of international operations leading to an increased number of detected and disrupted organised crime groups; * a high level of security in cross-border joint operations and increased efficiency in investigating corruption in border areas. | * To a very large extent * To a large extent * In neither great nor small degree * To a small extent * To a very small extent * Don't know / can't judge | Radio button list, single selection |
| [All] | 9 | In view of your experience over the last three years, to what extent are the following types of equipment likely to contribute to more and more effective cross-border operations:   * Vehicles to be used for investigative, search and cross-border operations and maintenance of existing vehicles * Personal protection equipment (including tactical vests) * TETRA ( Terrestrial Trunked Radio) radio communication * IT equipment (including laptops, multifunction devices, stationary printers, external hard drives, desktop computers, monitors, computer configurations) * Other (please explain) | * To a very large extent * To a large extent * In neither great nor small degree * To a small extent * To a very small extent * Don't know / can't judge | Radio button list, single selection |
| [All] | 10 | Given your experience over the past three years, to what extent are the following types of equipment likely to actually support your day-to-day work?   * Vehicles to be used for investigative, search and cross-border operations and maintenance of existing vehicles * Personal protection equipment (including tactical vests) * TETRA ( Terrestrial Trunked Radio) radio communication * IT equipment (including laptops, multifunction devices, stationary printers, external hard drives, desktop computers, monitors, computer configurations) * Other (please explain) | * To a very large extent * To a large extent * In neither great nor small degree * To a small extent * To a very small extent * Don't know / can't judge | Radio button list, single selection |

* 1. Interviews conducted

|  |  |  |  |
| --- | --- | --- | --- |
| Code[[104]](#footnote-105) | Position | Structure | Mode / Date of interview |
| 1 | Managing Authority PROGRAMMES AND PROJECTS DEPARTMENT | IPD | Online / 19.02. 2024 |
| 2 | Managing Authority - MONITORING, VERIFICATION AND PAYMENTS DEPARTMENT | IPD | Online / 19.02. 2024 |
| 1 | Project Manager | GDCOC | Face to face / 21.02. 2024 |
| 2 | Project Coordinator | GDCOC | Online / 21.02. 2024 |
| 1 | Project Manager | SANS | Online / 22.02. 2024 |
| 2 | Deputy Project Manager | SANS | Online / 22.02. 2024 |
| 3 | Project Coordinator and Unit Representative  for international projects | SANS | Online / 22.02. 2024 |
| 1 | Central Coordination Unit | Ministry of Finance | Online / 27.2.2024 |
| 2 | Central Coordination Unit | Ministry of Finance | Online / 27.2.2024 |
| 1 | Director and Project Manager | DCIS | Online / 22.2.2024 |
| 2 | Head of Sector, International projects Department | DCIS | Online / 22.2.2024 |
| 2 | Deputy Rector and Project Leader | Academy of the Ministry of Interior | Online / 23.2.2024 |
| 1 | International Projects Expert | Academy of the Ministry of Interior | Online / 23.2.2024 |

1. Survey results

There were 20 respondents to the survey, all officers with police powers from the Directorate General for Combating Organised Crime.

1. To what extent are you familiar with the support that the GDCOC receives under the Internal Security Fund 2021-2027?
2. In view of the challenges you have faced in your workplace over the last three years, to what extent do you find the following objectives of the Internal Security Fund significant and worthy of priority?
3. Given your experience, to what extent in your work do you identify a need for the following support for your unit to work effectively?
4. In view of its experience over the last three years, to what extent would the provision of costs for participation in cross-border operations and joint investigation teams contribute to the effectiveness of:
5. In view of its experience over the last three years, to what extent is it likely that the provision of costs for participation in cross-border operations and joint investigation teams, expert meetings/seminars/experience sharing/joint exercises will lead to:
6. In view of your experience over the last three years, to what extent are the following types of equipment likely to contribute to more and more effective cross-border operations:
7. Given your experience over the past three years, to what extent are the following types of equipment likely to actually support your day-to-day work?

1. See: https://commission.europa.eu/law/law-making-process/planning-and-proposing-law/better-regulation/better-regulation-guidelines-and-toolbox\_en [↑](#footnote-ref-2)
2. MOI Activity Report 2020, available at https://www.mvr.bg/docs/default-source/planiraneotchetnost [↑](#footnote-ref-3)
3. Report on the activities of the Ministry of the Interior for 2020 [↑](#footnote-ref-4)
4. Interview GDCOC1 [↑](#footnote-ref-5)
5. MOI Performance Report 2022, available at https://www.mvr.bg/docs/default-source/planiraneotchetnost/ [↑](#footnote-ref-6)
6. Report on the activities of the Ministry of the Interior for 2022 [↑](#footnote-ref-7)
7. Report on the activities of the Ministry of the Interior for 2022 [↑](#footnote-ref-8)
8. References on the migration situation in the country, available at https://www.mvr.bg/ [↑](#footnote-ref-9)
9. Interview GDCOC 1 [↑](#footnote-ref-10)
10. Interview GDCOC 1 [↑](#footnote-ref-11)
11. Ministry of the Interior Activity Report 2021, available at https://www.mvr.bg/docs/default-source/planiraneotchetnost; Ministry of the Interior Activity Report 2022, Interview GDCOC 1 [↑](#footnote-ref-12)
12. https://www.mediapool.bg/bulgaria-e-vklyuchena-v-siv-spisak-za-prane-na-pari-news352749.html [↑](#footnote-ref-13)
13. Report on the activities of the Ministry of the Interior for 2022 [↑](#footnote-ref-14)
14. Decision No. 196 of 11 April 2019 on the approval of the analysis of the socio-economic development of Bulgaria 2007-2017 for the identification of national priorities for the period 2021-2027, the list of policy objectives to be supported during the programming period 2021-2027 and the list of programmes and lead agencies for their development, available at https://www.eufunds.bg/sites/default/files/uploads/eip/docs/2019-04/%D0%A0%D0%9C%D0%A1%20196%202019.pdf. [↑](#footnote-ref-15)
15. Decree No 142 of 7 June 2019 on the development of the strategic and programming documents of the Republic of Bulgaria for the management of the European Union funds for the programming period 2021-2027, available at https://dv.parliament.bg/DVWeb/showMaterialDV.jsp?idMat=138460. [↑](#footnote-ref-16)
16. Decision 718 of 15 October 2021 of the Council of Ministers approving the draft programmes of the Republic of Bulgaria under the Instrument for Financial Support for Border Management and Visa Policy, the Internal Security Fund and the Asylum, Migration and Integration Fund. [↑](#footnote-ref-17)
17. Decree No. 302 of the Council of Ministers of 29.09.2022 on the establishment of monitoring committees for the Partnership Agreement of the Republic of Bulgaria and the programmes co-financed by the European Social Fund for the programming period 2021 - 2027. 79 of 4.10.2022, in force from 4.10.2022, available at https://www.eufunds.bg/sites/default/files/uploads/eip/docs/2022-10/%D0%9F%D0%9C%D0%A1%20302%20%D0%BE%D1%82%202022%20%D0%B3.pdf. [↑](#footnote-ref-18)
18. Interview IPD2 [↑](#footnote-ref-19)
19. Interview DCIS2, Minutes of the TWG meeting of 9 September 2021. [↑](#footnote-ref-20)
20. Interview IPD 2, Interview GDCOC2, Interview SANS3, Interview Ministry of Interior Academy1 [↑](#footnote-ref-21)
21. Interview IPD 2, Interview GDCOC 2, Interview SANS3, Interview Ministry of Interior Academy1, Minutes of the meetings of the TWG [↑](#footnote-ref-22)
22. Minutes of the meeting of the TWG held on 11 March 2020. [↑](#footnote-ref-23)
23. Interview GDCOC2, Interview SANS3 [↑](#footnote-ref-24)
24. Minutes of the meeting of the TWG held on 9 September 2021. [↑](#footnote-ref-25)
25. Minutes of the meeting of the TWG held on 9 September 2021. [↑](#footnote-ref-26)
26. Minutes of TWG meeting of 9 September 2021, Minutes of TWG meeting of 23 December 2021. [↑](#footnote-ref-27)
27. Indicative Annual Work Programme for 2023 of the ISF Programme of the Republic of Bulgaria and Annual Report on the Implementation of the ISF Programme of the Republic of Bulgaria for 2023. [↑](#footnote-ref-28)
28. Interview CCU1 [↑](#footnote-ref-29)
29. Interview IPD2, Interview GDCOC2, Interview DCID1, Interview SANS1 [↑](#footnote-ref-30)
30. Minutes of meetings of the SC, available at https://iacp-sofia.mvr.bg/dmp [↑](#footnote-ref-31)
31. Interview GDCOC2, Interview DCIS1, Interview Academy1 [↑](#footnote-ref-32)
32. Interview IPD2, Interview SANS1 and SANS3 [↑](#footnote-ref-33)
33. Interview Academy1 and Interview Academy2 [↑](#footnote-ref-34)
34. Interview Academy2 [↑](#footnote-ref-35)
35. Interview GDCOC2, Interview DCID1 [↑](#footnote-ref-36)
36. Interview GDCOC2 [↑](#footnote-ref-37)
37. Interview GDCOC2 [↑](#footnote-ref-38)
38. Interview IPD1, Interview IPD2, Interview IPD3 [↑](#footnote-ref-39)
39. Interview IPD1, Interview IPD2, Interview IPD3 [↑](#footnote-ref-40)
40. Annual Report on the Implementation of the ISF Programme 2023, Interview IPD1 [↑](#footnote-ref-41)
41. Interview IPD1, Interview IPD3 [↑](#footnote-ref-42)
42. Interview Academy2, Interview SANS3 [↑](#footnote-ref-43)
43. Interview DCID1, Interview Academy1, Interview SANS1 [↑](#footnote-ref-44)
44. Interview SANS3 [↑](#footnote-ref-45)
45. Interview GDCOC2, Interview DCID1 [↑](#footnote-ref-46)
46. Interview Academy1 [↑](#footnote-ref-47)
47. Interview SANS1, Interview SANS2, Interview SANS3, Interview Academy1, Interview GDBOP2 [↑](#footnote-ref-48)
48. Annual Report on the Implementation of the ISF Programme 2023, Interview IPD3 [↑](#footnote-ref-49)
49. Interview CDC1 [↑](#footnote-ref-50)
50. ISF, FUMI and BMVI 2021 - 2027. [↑](#footnote-ref-51)
51. ISF, AMIF and BMVI 2021 - 2027. [↑](#footnote-ref-52)
52. Article 22 of the AMFEFSM [↑](#footnote-ref-53)
53. Art. 21 of the AMFEFSM [↑](#footnote-ref-54)
54. Interview IPD2 [↑](#footnote-ref-55)
55. Interview GDCOC2 [↑](#footnote-ref-56)
56. Interview IPD2, Interview DGCOC2, Interview DGCOC3, Interview MIA Academy2 [↑](#footnote-ref-57)
57. Interview GDCOC2 [↑](#footnote-ref-58)
58. Interview IPD2, Interview DGCOC2, Interview DGCOC3, Interview MIA Academy2 [↑](#footnote-ref-59)
59. According to the provision of Art. 302 of 29.09.2022 and by order of the Minister of the Interior [↑](#footnote-ref-60)
60. Decree of the Council of Ministers No. 302 of 29.09.2022 [↑](#footnote-ref-61)
61. Interview CCU2, Interview GBCOC2 [↑](#footnote-ref-62)
62. Interview GDCOC2, Interview SANS1 [↑](#footnote-ref-63)
63. Regulation No. H-21 of 19 December 2023 on requirements for clean vehicles, available at https://dv.parliament.bg/DVWeb/showMaterialDV.jsp;jsessionid=68E52A53129998EBB659AED9E4F0F022?idMat=202238 [↑](#footnote-ref-64)
64. Interview GDCOC2 [↑](#footnote-ref-65)
65. Interview MOI Academy1 [↑](#footnote-ref-66)
66. Minutes of the written procedure for non-consensual decision-making of the Monitoring Committee for the Internal Security Fund and the Instrument for Financial Support for Border Management and Visa Policy 2021-2027 programmes, held between 04.10.2023 and 11.10.2023. [↑](#footnote-ref-67)
67. Annex 14 of the SWMP of the FSMP, FWS and IWMP 2021-2027. [↑](#footnote-ref-68)
68. 2023 Annual Implementation Report, Information Days at https://www.mvr.bg/IPD [↑](#footnote-ref-69)
69. Summary of the EMIS data base [↑](#footnote-ref-70)
70. Summary of project proposals in EMIS [↑](#footnote-ref-71)
71. Methodology for selection of operations [↑](#footnote-ref-72)
72. Project Monitoring Procedure, Annex 8 of the Management and Control System [↑](#footnote-ref-73)
73. MS Interview. [↑](#footnote-ref-74)
74. According to information from the DMO, a risk analysis has already been developed in relation to the requirement to carry out so-called management verification in the sense of Article 74 CPR. This analysis will be included in the next amendment of the QMS. [↑](#footnote-ref-75)
75. Interview IPD [↑](#footnote-ref-76)
76. Interview CCU [↑](#footnote-ref-77)
77. Interview CCU [↑](#footnote-ref-78)
78. Interview DCIS2, Interview DCIS3, Interview Academy 2 [↑](#footnote-ref-79)
79. Interview DCIs

    S2, Interview DGCOC2 [↑](#footnote-ref-80)
80. Interview DGCOC2 [↑](#footnote-ref-81)
81. Interview CDC1 [↑](#footnote-ref-82)
82. Interview MA3 [↑](#footnote-ref-83)
83. Interview GDBOP2 [↑](#footnote-ref-84)
84. Interview IPD3, Interview GDCOC2 [↑](#footnote-ref-85)
85. Interview IPD3 [↑](#footnote-ref-86)
86. Interview GDCOC2, Interview CDC1 [↑](#footnote-ref-87)
87. Interview GDBOP2 [↑](#footnote-ref-88)
88. [https://www.mvr.bg/dmp](https://www.mvr.bg/dmp/%D0%B4%D0%B5%D0%B9%D0%BD%D0%BE%D1%81%D1%82%D0%B8/%D1%84%D0%B8%D0%BD%D0%B0%D0%BD%D1%81%D0%BE%D0%B2-%D0%BF%D0%B5%D1%80%D0%B8%D0%BE%D0%B4-2021-2027/%D1%84%D0%BE%D0%BD%D0%B4-%D0%B2%D1%8A%D1%82%D1%80%D0%B5%D1%88%D0%BD%D0%B0-%D1%81%D0%B8%D0%B3%D1%83%D1%80%D0%BD%D0%BE%D1%81%D1%82-2021-2027/%D0%BF%D0%BE%D0%BA%D0%B0%D0%BD%D0%B8-%D1%84%D0%B2%D1%81-2021-2027)  [↑](#footnote-ref-89)
89. Interview SANS3, Interview GDCOC 2 [↑](#footnote-ref-90)
90. Interview IPD [↑](#footnote-ref-91)
91. Project proposal BG65ISPR001-3.002-0001 [↑](#footnote-ref-92)
92. Interview CCU1 [↑](#footnote-ref-93)
93. Interview CCU1 [↑](#footnote-ref-94)
94. Interview CCU1 [↑](#footnote-ref-95)
95. Interview CCU1 [↑](#footnote-ref-96)
96. Interview CCU1 [↑](#footnote-ref-97)
97. Interview CCU1 [↑](#footnote-ref-98)
98. Annual progress report on the implementation of the ISF programme for 2023. [↑](#footnote-ref-99)
99. Interview GDCOC1, Interview GDCOC2, Interview SANS1, Interview Academy of the Ministry of Interior 1 [↑](#footnote-ref-100)
100. Interview DCIS 1 [↑](#footnote-ref-101)
101. Interview DCIS 1 [↑](#footnote-ref-102)
102. Interview DCIS 1 [↑](#footnote-ref-103)
103. Interview SANS1 [↑](#footnote-ref-104)
104. In the report, interviews are presented with codes that correspond to the structure where the interview was conducted and the interview number. [↑](#footnote-ref-105)