

Campaign of Roma organizations created preconditions for directing Structural funds resources for Roma integration in Bulgaria



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The Campaign

In May 2006 Center Amalipe and Open Society Institute, Sofia, started an advocacy campaign for including major issues related with Roma integration in the strategic documents regulating the EU Structural funds absorption in Bulgaria. In the following months 46 Roma NGOs and a number of Roma experts joined the campaign. Overcoming serious difficulties the campaign achieved almost all its goals and brought to establishing the majority of the necessary preconditions for directions resources from the Structural funds to Roma integration activities in Bulgaria. The success of the campaign and its importance for the development of the civil society in Bulgaria in general has been acknowledged by the Bulgarian Minister of Finance Plamen Oresharski during the ceremony for signing the National Strategic Reference Framework, as well

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as in a special letter by Thomas Bender, head of unit “ESF, Monitoring of Corresponding National Policies I, Coordination Bulgaria, Croatia, Hungary, Netherlands, Employment, Social Affairs and Equal Opportunities DG

STRENGTHS (RESULTS ACHIEVED):

As a result of the advocacy campaign important strategic documents contain the necessary preconditions for binding European funds resources with the process of Roma integration, for devoting significant financial resource and political and administrative engagement for activities directed to Roma integration and for the participation of the Roma community and the civil society in general in managing, implementing, and monitoring activities financed by the European funds.

Human Resource Development Operational Program

This program has been of highest interest for the campaign and at present it contains practically all suggestions made by the Roma organizations. At present this is the Program which contains measures and indicators for Roma integration in the most consistent way.

Within the campaign the following has been achieved:

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Results achieved: the HRD OP

1. Roma are defined as specific target group in three priority axes of the Program related to employment, health care, and social protection;
2. There are six operations where Roma are a specific target group which is the main target group of the operations: two in the field of employment, one in education, two in social protection, and one in health care.
3. The Program contains a specific chapter “Areas of assistance with regard to the Roma community”
4. The Program contains qualitative and quantitative indicators for assessing the impact on the Roma community: the table of indicators is part of the chapter “Areas of assistance with regard to the Roma community”
5. NGOs are included as beneficiaries in all operations directed to Roma integration
6. NGOs are included as possible leading beneficiaries in the “program extensions” which are being prepared now.
7. A number of concrete and accurate texts connected with the socio-economic and educational situation of the Roma community in Bulgaria are included in the Program.
8. A representative of the Roma organizations (Deyan Kolev) is included in the Monitoring Committee of HRD OP and participated in the preliminary meeting of the Committee on June 18, 2007.

Results achieved:

The National Strategic Reference Framework

The Framework is a broader strategic document compared to the sector Operation programs. It tracks the most serious problems of the social and economic development of the country and the general trends for their solving for the next seven years. In this respect the inclusion of the most aching issues concerning the Roma community and directions for their solving was a must in order to have them as concrete detailed operations and measures in the specific Operational programs.

The final version of the NSRF satisfactory reflects the major problems before Roma integration in Bulgaria and provides opportunities for targeted actions in the detailed Operational programs.

The following results have been achieved within the campaign:

«Written comments were received on the NSRF from Roma organizations such as Amalipe, especially contributing to the sources of information used. In addition over 45 Roma organizations have provided formally and informally comments on the different parts of the text of the Human Resources Development Operational Programme. In conformity with the partnership principle the comments and recommendations have been reviewed and about 90 % of them have been accepted and integrated in the programme.» (cmp.195)

1. Including a special chapter “Roma minority”
2. Including Roma as a specific target group of intervention and objective reflection of the situation and the problems of the Roma community (recognizing also the discrepancy between official census data and real situation)
3. Taking into consideration the most aching problems of the Roma community and mainstreaming them in all spheres: education, health, social sphere, housing, IT, and so on.
4. Acknowledging all the key documents directed to Roma integration and adopted by the Bulgarian government (the Framework program for equal integration of Roma in Bulgarian society, the National Action Plan for the Decade of Roma Inclusion, the National program for improving the housing conditions of Roma and so on).
5. Explicit acknowledgment within the document of the efforts of Center Amalipe and the other Roma organizations which have organized and carried out the campaign.

Results achieved:

Strengthening the Roma participation and the influence of Roma movement

Within the campaign the following has been achieved:

1. Broad Roma representation of more than 30 organizations working together for elaborating a common Roma platform has been created.

2. There is already a precedent: the requirements of a coalition of Roma organizations which are not politically engaged have been accepted by the institutions – 90% of the suggestions of the campaign have been included in the NSRF (this is pointed also in the document itself) and HRD OP which proved that Roma organizations and activists could influence the decision-making process.

3. The Roma organizations included in the campaign turned to be the most active representatives of the civil society in Bulgaria participating in the process of preparation of the strategic documents. The example of the Roma NGOs has been taken over by other groups such as gender organizations, disabled people, and so on.

4. The active role and the constructive position of the Roma organizations have been acknowledged by the Bulgarian institutions

National report on the strategies for social protection and social inclusion

Similar to the NSRF the document has a high level of abstractness. It draws the major directions of development for the social inclusion. Applying the requirement for consistency characteristic for the EU strategic documents all national strategic documents (the NSRF, OPs, etc) should follow the direction drawn by the National report on the strategies for social protection and social inclusion.

At present the National report on the strategies for social protection and social inclusion satisfactory reflects the major problems before Roma integration in Bulgaria combining targeting и mainstreaming approach and provides significant resources for solving some of the most aching problems of the Roma community

Within the campaign the following has been achieved:

1. Including vulnerable ethnic minorities (with special focus on Roma) as a major target group;

2. Defining the “Social inclusion of vulnerable ethnic minorities” as one of the four major priorities; including the problems of Roma community in two other priorities (“equal participation on the labor market” and “equal access”);

3. Including proper and adequate measures and indicators in the the field of employment and social protection, education, health care and living conditions in the priority “social inclusion of the most vulnerable minority groups”;

4. Including of detailed and correct information about Roma community issues in the analysis of the overall situation

5. The results achieved in the National report have been successfully used later in the campaign for including Roma issues in the NSRF and HRD OP on the basis of the requirement for consistency.

Weaknesses:

1. A significant part of the Roma suggestions have not been included in *Regional Development Operational Program, Administrative capacity OP and the National Plan for Development of Rural Areas* have not been taken into consideration: within the campaign requirements for including measures and indicators directed to Roma have been proposed to the strategic documents pointed above.

2. Some of the Roma organizations stayed indifferent to the process: although a significant number of the active Roma NGOs joined the campaign, some did not realize the importance of this process and preferred to stay aside;

3. Decree of the Council of Ministers 182/21.07.2006 г. for defining the members of the Monitoring Committees does not open space for active involvement of NGO representatives: The decree was

adopted in July 2006 and was not object of the campaign. It allows limited functions of the NGOs (only observers with advisory voice); it does not imperatively require the participation of NGO representatives and does not point out clear mechanism for electing such representatives. Nevertheless, the Decree provides opportunity for participation of NGOs in the Monitoring Committees and within the campaign the Roma organizations united around seven nominations for the Monitoring Committee;

4. Up to now the campaign has not concentrated on improving the financial scheme for project implementation within the Structural funds. Small amounts of advance money would be provided for project implementation. This, together with the lack of a Revolving fund for projects where the NGOs are leading applicants strongly limits the possibility for such projects. Up to now this issue has not been discussed

Opportunities:

1. The program extensions to the different OPS provide more concrete activities directed to Roma integration. The program extensions are documents elaborated by the intermediate bodies and provide concrete types of activities for each OP. Regarding HRD OP they could provide concrete activities for Roma integration. Regarding the other OPs they could complement what is lacking so far in the operational programs themselves: defining target activities for Roma integration.

2. Including Roma representatives in the Monitoring Committees of the OPs and the NSRF: this would provide opportunity for efficient defending what has been achieved so far within the campaign. It will provide also possibility for permanent monitoring on behalf of the civil society to what extent the opportunities achieved so far by the civil organizations are being used. Finally, it could lead also to correcting some of the operations and measures on the basis of the results from the monitoring. This however will be an opportunity only if these representatives are vocal enough and well acquainted with the strategic documents and EU procedures. If they are just passive observers the results achieved so far regarding the representation in the Monitoring Committees will be lost

3. Building regional centers supporting projects of NGOs and other beneficiaries: they would provide opportunities for the Roma NGOs, as well as other possible beneficiaries to take advantage of the opportunities achieved during the campaign –

opportunities for large-scale targeted activities and activities and projects for Roma integration.

5. Establishing a Revolving Fund for advance financial support of projects of NGOs and other beneficiaries directed to Roma integration and approved for financing from the Structural funds. It would allow NGOs to participate as equal beneficiaries when applying for EU funds despite the hard financial scheme (small prepayments, need for investment of significant own resources, both human and financial). Thus they will be able to use the opportunities created in the development of the campaign. This will allow the involvement of the highest possible range of civil society actors/experts in the field of Roma integration.

6. Operation 2.3. in Administrative capacity Operational Program is directed completely towards development of human potential in NGOs for applying for Structural funds projects. Beneficiaries of this operation could be only NGOs. It answers one of the major weaknesses registered by the program itself regarding the civil society in Bulgaria: the lack of capacity to design and implement projects within the Structural funds. After the access of NGOs to Structural funds project and the development of capacity are technically provided, their participation as leading beneficiaries and partners should be clearly regulated also in the instruction for applying for the different operations prepared in the Monitoring committees of the different OPs. Additional precondition is the provision of financial resources for NGOs when applying for Structural funds projects.

Threats:

1. Dividing the Roma movement and contradicting the Roma organizations to each other;

2. Political pressure and institutional pressure when defining Roma representatives for the Monitoring Committees;

3. Setting additional limitations through the program extensions;

4. Introducing limitations through the financial system of project payment

5. Limitations due to the low capacity for preparing and implementing projects with EU financing.

Major participants:

The campaign was initiated by Center Amalipe in May 2006. Gradually 46 Roma organizations and significant institutions like Open Society Institute – Sofia joined the campaign (see the list of organizations attached in Appendix 1). A number of Roma experts also joined the campaign. Some of them have been nominated representatives in the Monitoring Committees (see the list below). A number of international organizations and activists also joined and supported the campaign.

Supporters:

1. The campaign was financially supported by Open Society Institute, Sofia, and Cordaid, the Netherlands;

Our statements within the campaign have been supported by prominent international activists and organizations (Lívía Járóka, MEP, EPP-ED, Minority Rights Group International, European Roma Grassroots Organizations, MINE, Cordaid, Spolu IF Netherlands): they expressed their support through special letters and petitions sent to the Bulgarian Ministry of Labor and Social Policy and DG Employment, Social Affairs, and Equal Opportunities in the European Commission

2. DG Employment, Social Affairs, and Equal Opportunities in the European Commission fully supported the campaign and the constructive dialogue between the NGOs and the Bulgarian institutions. This support was expressed in two letters by Thomas Bender, Head of Unit, DG Employment.

The final approval of the strategic documents is done in the DGs responsible for their elaboration; they participate (through sending recommendations and discussions) in the elaboration of the documents themselves. As a result of the permanent contacts of Roma NGOs (and particularly Center Amalipe) with experts from the relevant DGs, as

well as the professionalism of these experts most of the recommendations (and especially those sent by DG Empl.) contained most of the suggestions of the Roma NGOs. This fostered their accepting by the Bulgarian institutions.

3. The campaign however did not find support from some of the Bulgarian institutions (the National Council for Cooperation on Ethnic and Demographic issues, Ministry of State Administration, Ministry of education, etc): some of the institutions mentioned above reacted against the including of Roma as a target group in the strategic documents. Others reacted against the involving of NGOs as beneficiaries in the operations with the argument that there were not enough mechanisms guaranteeing transparency in the financing of the NGOs.

The negative attitude of many of the Bulgarian institutions towards involving the NGOs in general, as well as their negative reaction towards including Roma as a target groups in the operations created serious difficulties within the campaign.

At the same time the campaign met the constructive and cooperative attitude and behaviour of the European Funds and Programs Directorate of the Ministry of Labor and Social Policy

Stages of the campaign:

The campaign included a number of different types of advocacy activities in several directions:

1. Uniting Roma organizations around a common platform: the process was initiated by Center Amalipe together with elaborating the first suggestions to the strategic documents. The development of the Roma NGO platform went through several stages:

- A meeting of Roma NGOs on 19 and 20 May 2006 in Veliko Turnovo: at this meeting the participants united around suggestions for changes of the present draft of HRD OP;

- National working meeting of Roma NGOs on October 8-9, 2006 in Sofia. The representatives of the

NGOs elaborated suggestions for changes in four OPs and the NSRF; they created working groups for further development of these suggestions and turned with letters to the relevant Bulgarian and EU institutions for taking into consideration these suggestions;

- Second national working meeting of Roma NGOs on December 9-10, 2006 in Sofia. At the meeting the participants discussed and approved the suggestions already elaborated to four OPs and the NSRF; discussed criteria for possible representatives in the Monitoring committees and prepared joint statements to the Bulgarian and EU institutions. Representatives of the Ministry of labor and social policy and the Ministry of State administration were also present at the meeting.

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- Expanding the platform of Roma NGOs: during the following months the coalition of Roma NGOs involved in the campaign extended to 47 organizations including the most active Roma organizations and activists.

2. Elaborating suggestion for changes in the strategic documents: this has been a multi-stage process; the proposal elaborated have been updated several times with the updating of different drafts of the strategic documents. The process has been highly transparent and participatory: representatives of 47 organizations, as well as Roma experts and civil servants working in public administration participated in. The suggestions made by the different organizations and experts were systematized by Roma experts as follows:

- National report on the strategies for social protection and social inclusion – Deyan Kolev
- National Strategic Reference Framework – Teodora Krumova
- Human Resource Development Operational program – Deyan Kolev
- Administrative capacity OP – Sasho Kovachev, Viktoria Borisova, Spaska Mihajlova, Teodora Krumova
- Regional development OP – Maria Metodieva, Milen Milanov
- National plan for development of rural areas – Lili Makaveeva

3. Advocacy activities before the Bulgarian institutions: a broad range of activities regarding the Bulgarian institutions responsible about the elaboration of the documents discussed above have been undertaken for including the Roma requirements in the documents. This activities included:

- Organizing a meeting “The Operational programs and the Roma inclusion” with the institutions preparing the documents. The meeting was organized with the help of the deputy minister of labor and social policy at that time and national coordinator of the Decade of Roma Inclusion Yavor Dimitrov. The meeting took place on October 13, 2006 in the Ministry of labor and social policy. Representatives of five ministries, organizations part of the campaign (Center Amalipe, Open Society Institute, Sofia, the National association of Roma working

in public administration, Integro Association, and Hot Line), as well as Roma organizations which did not join the campaign (representatives of the Roma educational fund in Bulgaria). At the meeting the institutions were acquainted with the proposals of the Roma organizations; the Roma participants insisted again for the inclusion of these proposals in the documents;

- Working meetings with the institutions responsible for the elaboration of the documents: a number of working meetings of Roma experts with institutions representatives took place. Such meetings were organized with representatives of the Ministry of labor and social policy (7 working meetings), Ministry of finance (two meetings on October 13, 2006 and October 31, 2006), Ministry of state administration and administrative reform (December 1, 2006) and so on.

- Participation in the working groups preparing the drafts of the strategic documents: no Roma representatives was included in the working groups on HRD OP and the NSRF. Nevertheless, as a result of the successful campaign representatives of Center Amalipe and Open Society Institute were invited to take part in the meetings of the working group preparing the HRD OP. As a result of their participation the working group finally accepted the Roma requirements for the Operational program.

4. Advocacy activities before the European institutions: these activities have been realized by Center Amalipe with the support of Cordaid, the Netherlands, and Minority Rights Group International UK. Within the campaign the following activities were realized:

- Public discussion in the European parliament in Brussels on the Roma inclusion in Bulgaria and Romania and the EU Accession process. The meeting took place on October 6, 2006. Deyan Kolev was one of the participants at the workshop. His presentation focused on the Operational programs and the opportunities they provide for Roma inclusion.

- Working meetings in DG Employment, social inclusion, and equal opportunities: on October 7, 2006 Deyan Kolev and Georgi Bogdanov held meetings with Walter Wolf, Dimo Iliev, Resa Koleva, and Bistra Valchanova from DG Employment, social inclusion, and equal opportunities. Several meetings were organized also in the following months. Roma representatives got the EU experts acquainted with the essence of the Roma proposals and the importance of the European funds (and particularly HRD OP) for the real integration of the Roma community in Bulgaria..

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5. Elections of Roma representatives in the Monitoring committees

○ Art.10 of MC Decree 182/21.07.2006 allows the participation of NGO representatives in the work of the Monitoring committees. Using this opportunity on June 16, 2007, 30 Roma organizations gathered at a meeting in Sofia organized by Diverse and Equal Association and elected their representatives:

National Strategic Reference Framework

1. Maria Metodieva, Roma Program Director, Open Society Institute – Sofia - member
2. Georgi Parushev, Support for Roma Foundation, Sofia - substitute

Administrative capacity OP

1. Dimitar Dimitrov, Open Society Institute, Sofia - member
2. Spaska Mihajlova, New Road Association, Hayredin - substitute

Regional development OP

1. Milen Milanov, Diverse and Equal Association, Sofia - member
2. Georgi Golov, United Roma union – Sliven - substitute

Steps ahead:

1. Establishing of the elected Roma representatives in the Monitoring Committees

Significant advocacy activities still need to be done in order the Roma representatives to be included in all Monitoring committees:

○ *Plan-minimum:* including the Roma representatives in the Monitoring Committees with the status of observers (according to art.10 of Decree 182/21.07.2007)

○ *Plan-maximum:* including them with the status of members. This would be possible only if the representatives elected are proposed also by the Council of Ministers. We have sent a request for this to the Prime Minister.

Human Resource Development OP

1. Deyan Kolev, Center for Interethnic Dialogue and Tolerance “Amalipe”, Veliko Turnovo - member
2. Milen Milanov, Diverse and Equal Association, Sofia - substitute

Environment OP

1. Gancho Iliev, World without Borders Association, Stara Zagora - member
2. Zlatko Mladenov, Kupate Roma Public Council, Sofia - substitute

Competitiveness of Bulgarian Economy OP

1. Kiril Paganinov, Equal Opportunities Initiative Association, Sofia - member
2. Varban Marinov, Regional Center for European Development. Pleven - substitute

National plan for development of rural areas

1. Lilia Makaveeva, Integro Association, Razgrad - member
2. Georgi Golov, United Roma union – Sliven - substitute

The Roma organizations sent letters with the names and CVs of the elected people to the responsible ministries, the Prime Minister, and the relevant DGs in the European Commission.

Realizing this step one of the things that will be watched out is avoiding and preventing political and administrative pressure on Roma representatives, as well as avoiding contradicting one organization to another.

2. Adopting program extensions which would support the Roma integration process

After the adopting of the Operational programs (which is expected by the end of September 2007) the efforts of the advocacy campaign will be directed toward preparing good program extensions and including concrete actions for Roma integration in them. The role of the Roma representatives in the Monitoring Committees will be also to monitor the application process and ensure that Roma organizations also apply

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Steps ahead:

The start of this part of the campaign was on June 18, 2007 when the preliminary meeting of the Monitoring Committee on HRD OP took place. The Roma representative Deyan Kolev managed to defend the right of NGOs to be beneficiaries of projects directed to minority educational integration although the suggestions of the Ministry of education tried to completely exclude NGOs and allow only municipalities to apply for projects.

3. Raising the capacity of Roma NGOs, municipalities and other beneficiaries for designing and implementing projects directed to Roma integration and financed with European funds: the scheme of EU funds, design and implementation of projects is different from the scheme applied with the pre-accession funds or other donors programs. Therefore, it is necessary to invest in raising the capacity of Roma NGOs.

4. Establishing sustainable partnerships between Roma NGOs and municipalities for realizing joint projects directed to Roma integration.

5. Establishing a Revolving fond for advance financial support of NGO projects directed to Roma integration. Additional advocacy activities need to be undertaken before the Ministry of Finance for opening a Revolving fund for NGOs (at present such a fund has been agreed for the support of municipalities). Such activities need to be undertaken also before private donors proved to be supportive of the process of Roma integration.

The cooperation needed:

Things in two directions need still to be made further in order to finish successfully the campaign:

1. Political support:

- For including the elected Roma representatives in the Monitoring committees
- For adopting program extensions which would guarantee the process of Roma integration
- For establishing a Revolving fund for financial support of NGOs;

2. Financial support:

- For raising the capacity of Roma NGOs, municipalities and other beneficiaries for designing and implementing projects directed to Roma integration with European funds: a possible format is developing regional center to consult and support Roma NGOs and the other possible beneficiaries;
- For establishing a Revolving fund for financial support of NGOs;
- For coordination of the activities left until the end of the campaign

All strategic documents can be found at www.eufunds.bg

Appendix 1

Organizations which have participated in the elaboration of the proposals to the National strategic reference framework, the Operational programs and the National plan for development of rural areas

1. Center for Interethnic Dialogue and Tolerance “Amalipe” – Veliko Turnovo
2. „Diverse and equal” Association, Sofia
3. Integro Association - Razgrad
4. ROMA Youth program
5. United Roma Union “Sliven”, Sliven
6. District Roma Union - Burgas
7. World without Borders Association, Stara Zagora
8. Lozenetz Foundation, Stara Zagora
9. “O Romano Drom” Association, Pernik
10. Most Association - Kaspichan
11. Savore Foundation, Samokov
12. Roma Initiative Foundation, Sofia
13. Civil Initiative for the Development of Hristo Botev Neighbourhood, Sofia
14. Roma integration Foundation, Sofia
15. Simona 2002 Chitaliste, Sofia
16. Support for Roma Foundation
17. Vita Romano Foundation – 2001, Sliven
18. New Life for Roma in Bulgaria Foundation, Sliven
19. Future Foundation - Rakitovo
20. Nevy Cherhen – New Star Association, Kyustendil
21. Amalipe – Friendship Association, Kyustendil
22. SHAM Resource Center Foundation - Montana
23. New Road Association - Hajredin
24. European Center for education and qualification - Sofia
25. Public Foundation - Kozloduy
26. Minority Integration and Development Foundation, Yambol
27. Kamala Alternative center for personal development - Vratza
28. Embers and Light Association - Vratza
29. National Association of Roma Working in Public Administration
30. Roma Program, Open Society Institute Foundation – Sofia
31. GORD Civic Union for Roma Movement
32. Members of GORD Integro Association, Razgrad
33. Amare Phala Foundation, Seslav
34. DROM Association, Kubrat
35. Roma Zavet 2003 Association, Zavet
36. Integro Association, Senovo
37. Karmen Association, Razgrad
38. Fenix Association, Razgrad
39. Neve droma Foundation, Shumen
40. Roma Community Center – Vazovo,
41. Isperih Municipality
42. Roma Community Center - Rakovski, Razgrad municipality
43. Roma Community Center - Sevar
44. Roma Community Center - Vetovo
45. Roma Community Center - Marchevo
46. Ternipe Association - Simitli
47. “Good Mother – good children” Mother center - Sandanski
48. Roma solidarity - Petrich
49. Integro Foundation - Ognyanovo
50. Roma information center - Ivanski

Appendix 2

Organizations which participated in the election of Roma representatives in the National strategic reference framework, the Operational programs and the National plan for development of rural areas

| | ORGANIZATION | PLACE |
|-----|--|----------------|
| 1. | Amalipe Center for Interethnic Dialogue and Tolerance | Veliko Turnovo |
| 2. | Diverse and Equal Association | Sofia |
| 3. | Future – 2006 Foundation | Rakitovo |
| 4. | New Road Association | Hayredin |
| 5. | Integro Association | Razgrad |
| 6. | O Romano Drom Association | Pernik |
| 7. | Jar i svetlina Association | Vratza |
| 8. | Kamala Alternative center for personal development Association | Vratza |
| 9. | Integration and development of minorities Foundation | Yambol |
| 10. | District Romani Union | Burgas |
| 11. | Roma Integration Foundation | Sofia |
| 12. | Simona 2002 Chitaliste | Sofia |
| 13. | United Roma Union | Sliven |
| 14. | Savore Foundation | Samokov |
| 15. | Open Society Institute Foundation | Sofia |
| 16. | World without Borders Association | Stara Zagora |
| 17. | Gyulchay Foundation | Sofia |
| 18. | Support for Roma Foundation | Sofia |
| 19. | Roma Initiative Foundation | Sofia |
| 20. | Simona – 2000 Chitaliste | Sofia |
| 21. | Vita Romano – 2001 Foundation | Sliven |
| 22. | Equal Opportunities Initiative Association | Sofia |
| 23. | Good People Association | Sofia |
| 24. | Sham Foundation | Montana |
| 25. | Yordan Tzvetkov – Public council | Sofia |
| 26. | Yovka Vasileva – Public council | Sofia |
| 27. | Emil Mihaylov – Public Council | Sofia |
| 28. | Alexander Dimitrov – Public Council | Sofia |
| 29. | R.O.M.I Youth Program | Sofia |
| 30. | Youth network for development | Simitli |
| 31. | Ethnocultural dialogue Foundation | Sofia |
| 32. | Aver Foundation | Sofia |
| 33. | Civic development of Hristo Botev neighbourhood Association | Sofia |
| 34. | Sveti Georgi National Roma Center | Sofia |
| 35. | Kupate Roma Public Council | Sofia |
| 36. | Regional Center for European Development | Pleven |
| 37. | National association of civil servants working on Roma issues in public administration | Vratza |

**EUROPEAN COMMISSION**

Employment, Social Affairs and Equal Opportunities DG

ESF, Monitoring of Corresponding National Policies I, Coordination
Bulgaria, Croatia, Hungary, Netherlands

9110 22.06.06

Brussels,
EMPL A/2/THB/BV D(2006) 12228Ms Teodora Krumova
Amalipe Center for Interethnic
dialogue and tolerance
Veliko Turnovo 5000
p.o. box 113
Sofia
Bulgaria**Subject: Your letter of 5 June 2006**

Dear Mrs Krumova,

Thank you very much for your above e-mail and letter. We were extremely pleased to learn about the genuine interest and concern that your organisation has in the Human Resource Development Operational Programme (HRD OP) and the initiatives for the Roma minority that might possibly be part of it.

At the moment, the Commission services are consulting with the Bulgarian authorities on the National Strategic Reference Framework (NSRF). We discuss the document, its strategic priorities and the vision for Structural Funds support during the programming period 2007 - 2013.

The integration of the Roma community is for the Commission one of the issues that has to be properly addressed in the NSRF. The NSRF should address the different aspects of disadvantages that Roma people are facing, taking into account the cross-linkages and the sometimes contradictory aspects of the ways to solve the problems within the Roma minority. The most representative NGOs, dealing with relevant policy issues, including Roma integration, should participate both in preparing the NSRF and during its implementation.

At a later stage, the negotiations between the Commission and the Bulgarian authorities will focus on the different Operational Programmes. This will be the stage at which the priorities and operations within the different OPs will be discussed. This is also the time when your organisation can efficiently support and work with the Managing Authority and its working group on the elaboration of the HRD OP.

As far as the Commission services are informed, the working group on the HRD OP comprises a large spectrum of representatives from different institutions and social

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partners and they have been invited to the meetings of the working group. There will be a public debate on the HRD OP as well where you could also participate actively. The Managing Authority respects the partnership principle and – as we believe - will take into consideration the valuable ideas of the civil society. This includes continued efforts to strengthen the capacity of the NGOs and I interpret your pro-active contribution on the draft HRD OP as a proof that institutional and managerial capacities have already been reinforced.

However, let me draw your attention to the fact that in our view, Roma issues should not exclusively be dealt with by the HRD OP but that in fact the other OPs will need to address the integration of the Roma communities as well. This holds in particular, though not exclusively, true for the Administrative Capacity and for the Regional Development OPs and we will communicate this to the Bulgarian authorities. At the same time, we would encourage you to also pay attention to other draft OPs.

I would like to thank you again for your letter and hope that we can rely on your active participation during the further elaboration of the Structural Funds OPs.

Yours sincerely



Thomas Bender
Head of Unit

c.c.: Mr. Unterwurzacher, Mr van Oel (DG Regional Policy)

**EUROPEAN COMMISSION**

Employment, Social Affairs and Equal Opportunities DG

ESF, Monitoring of Corresponding National Policies I, Coordinator
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03067 01.03.07

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Dear Mr Kolev,

I would like to thank you very much for your letter dated 16 February 2007, in which you share with us your observations and concerns regarding the Operational Programme Human Resources Development (HRD OP). It is encouraging to see that these points are shared among other NGOs.

As you know, in the current version of the HRD OP the horizontal chapter 6 deals with assistance to the Roma community in Bulgaria. I trust that the importance of the challenges outlined in this chapter will be appropriately mirrored into the operational part of the HRD OP to be soon submitted to the European Commission.

The Commission has noted that the Strategic Report on Social Protection and Social Inclusion for Bulgaria, adopted by the Council of Ministers before its formal submission, identifies concrete targets in the field of Roma inclusion (please visit: http://ec.europa.eu/employment_social/social_inclusion/jrep_en.htm#joint_report). The OP HRD is one of the financial instruments for achieving these targets and in this context your recommendations could be useful for the Managing Authority in designing the appropriate operations to meet the targets set by the Council of Ministers of Bulgaria.

Having said this, under the EC Regulations 1083/2006 governing the Structural Funds and 1081/2006 on the ESF, it is the responsibility of the Member States themselves to establish the operational design of their programmes within the requirements set out in the relevant regulations. In this view, I note that ensuring *"equality of treatment and of opportunities for participation in the public life"* figures among the objectives of the Bulgarian law on protection against discrimination (art.2).

In this view, and in line with the provisions of Art. 11 of EC Regulation 1083/2006 and Art. 6 of EC Regulation 1081/2006, there is a clearly defined role for civil society representatives in the monitoring process, as a guarantee for transparency and respect of the partnership principle. Establishing the composition of the monitoring committee to include, on the basis of a transparent selection procedure, such representatives will reflect the spirit of the Structural Funds Regulations and will serve as a mechanism for prevention of discrimination. Furthermore, over the last couple of years, the NGO sector

in Bulgaria has accumulated experience and knowledge that could be useful for achieving social and economic cohesion in an ethnically diverse society.

Roma organisations should of course also be consulted on the drafting of the Operational Programmes until their final version is submitted formally to the European Commission. I understand that this has been the case in Bulgaria as far as the HRD OP is concerned.

I would like to encourage you to continue your dialogue with the Ministry of Labour and Social Policy. At the same time, the challenge of building cohesive societies goes beyond employment, education and social policies. Equal attention needs to be paid to other public policies and Structural Funds interventions capable of contributing towards the improvement of the situation of the Roma community. Therefore, without prejudice to the importance of the HRD OP to improving the social inclusion of the Roma minority, the principles of partnership and equal opportunities should be respected and promoted within all relevant operational programmes.

May I kindly ask you to send this letter to all your partner organisations listed in your letter of 16 February 2007.

Yours sincerely,



Thomas Bender
Head of Unit

Cc : Mrs Czarnota (SG, EC)
Mr Walker (DG REGIO, EC)
Ms Raeva, Ministry of State Administration and State Reform
Mr Popov, Ministry of Labour and Social Policy