

BULGARIA 13 "Hristo Botev" St., Veliko Tarnovo, 5000, PO Box 1 tel./fax: (+359) (062) 600224, (+359) 0888 681134 CENTER AMALIPE
CENTER FOR INTER-ETHNIC DIALOGUE AND TOLERANCE

www.amalipe.com -

The important asset of this process is that NGOs participate in it in a transparent way. There was a procedure for selecting NGO representatives in the Working groups who were elected by the groups of NGOs. After this procedure the NGO representatives participate on equal basis in the Working groups that prepare the Partnership contract and the Programs.

Another asset is the fact that the European Commission representatives and the Minister on EU Funds several times announced that Roma integration and the implementation of NRIS should be a strong priority for the next Programs. This was one of the main messages of the Follow-up event "Assessment of The Use of EU Funds For The National Strategies For Roma Integration", organized by the European Commission in Sofia on May 22, 2012 (see: http://www.amalipe.com/index.php?nav=news&id=1203&lang=2). The message was further developed by the Minister on EU Funds Donchev, the Minister on Regional Development, Pavlova, the Minister of Health Care, Desislava Atanasova, the Deputy Minister of Labor and Social Policy, Zornitsa Rusinova, the Deputy Minister of Education, Petya Evtimova, the Deputy Minister of Agriculture, Svetlana Boyanova, the head of the European Commission Representation in Bulgaria, Zinaida Zlatanova, the Chairman of the National Association of Municipalities, Todor Popov, on June 15, 2012 during the conference (see: http://www.amalipe.com/index.php?nav=news&id=1224&lang=2).

Until the end of 2012 the following results were achieved:

- In the Working group for preparing the Partnership contract was elected the Director of Roma Program at OSI, Maria Metodieva, as representative of the group of social organizations.
- In the Working group for preparing the new HRD OP were elected Deyan Kolev (Amalipe) and Gancho Iliev (World Without Borders Association) as representatives of the group of Roma organizations. In addition, the first draft of the HRD OP contains the investment priority "Integration of Marginalized Communities Such as Roma", that is a very important asset.
- In the Working group for preparing the new RADP was elected Yulia Grigorova (representative of WWF and Amalipe).
- Unfortunately no representative of Roma NGOs was elected in the Working group for preparing the new RD OP (Regions in Development OP).

The active preparation of the new Programs will happen in 2013. The first steps in 2012 are promising. It is necessary the European Commission to support and to guarantee the efforts for Roma integration to become strong priority in the next Programs. A possible framework for this could include:

- Incorporating the investment priority "Integration of Marginalized Communities Such as Roma" as one of the 4 main priorities for thematic concentration in the new HRDOP or as priority axes. Within this priority, funds could be provided for: multilateral projects for implementation of the Municipal Roma Integration Plans, NGO projects for activating the local Roma communities, funds for applying the standardized Integration interventions.
- Defining delegated budgets for Roma integration interventions in the new RDOP, RADP and Science and Education OP. These interventions should be linked with the investment priority "Integration of Marginalized Communities Such as Roma" from HRDOP.
- Dedicating funds for raising the capacity of the Roma NGOs as well as of the institutions engaged with Roma integration in the new Good Governance OP.
- Establishing an administrative unit that could coordinate the multi-funded operations and the fluent cooperation among different Programs with regard to Roma. This is strongly necessary to guarantee that the European funds would contribute for the implementation of the NRIS in a systemic way.

THE ENGAGEMENT OF ROMA CIVIL SOCIETY WITH THE NRIS

The EU Framework for NRISs requires a "close cooperation and continuous dialogue with the Roma civil society". As outlined in Amalipe's assessment of the

NRIS from February 2012 this task was only partly achieved during the process of NRIS implementation.

In 2012 improvement was achieved:

- -The Secretariat of the NCCEII as focal point for the NRIS begin a stronger cooperation with the Roma organizations; for organizing conferences and other events, in the process of steering the Municipal Roma Integration Plans preparation and so on. Although more should be done in this direction, the steps undertaken are positive.
- the Minister on EU Funds initiated transparent procedure for electing Roma NGO representatives in the Inter-ministerial Working Group for Resources Provision of Roma Integration. The Roma NGO representatives play a very active role in the Group and define its agenda on equal basis with the institutions.
- The Managing authorities of some Programs and the Minister on EU Funds initiated transparent procedure for electing NGO representatives in the Working groups for preparing the Partnership Contract and the new Programs. In the Group for preparing the new HRDOP, Roma NGOs were defined as separate category and elected its representatives. The Roma representatives play a very active role in the Group and define its agenda on equal basis with the institutions.
- The representatives of Roma NGOs in the Monitoring Committee of HRDOP play an active role and contribute significantly for linking the Program with the NRIS within the present period.

THE POSITIVE TREND FROM 2012 COULD BE FURTHER DEVELOPED THROUGH:

- -The NCCEII and its Secretariat could delegate certain activities and responsibilities of NGOs. As members of the NCCEII these organizations could represent the Council.
- Roma NGOs could be defined as specific group that elects its representatives in the Monitoring Committees of HRD OP, RD OP, Science and Education OP, Good Governance OP and the RADP.
- Ensuring stronger NGO participation in the implementation of the next Programs would have crucial impact. This could happen through envisaging global grants implemented by Roma NGOs, projects for activating the local Roma communities implemented by Roma organizations, and dedicating funds for capacity building of Roma NGOs.

DEVELOPING MONITORING AND EVALUATION FRAMEWORK

No advance in developing robust M&E framework was achieved in Bulgaria in 2012. The NRIS envisages only the so-called "administrative monitoring" and a sentence that allows other forms of M&E. Nevertheless, no efforts were done in this direction in 2012.

On June 26, AMALIPE Center for Interethnic Dialogue and Tolerance (Bulgaria), Romani CRISS (Romania), National Roma Centrum (Macedonia), European Roma Information Office (Brussels), in cooperation with European Economic and Social Committee organized a Hearing "Monitoring and Evaluation of The NRISs: Accent on Bulgaria and Romania", in Brussels. Representatives of the European Commission, Fundamental Rights Agency, member of European Parliament, national governments of Bulgaria and Romania, national and European Roma organizations, OSF, UNICEF and other stakeholders discussed how to build comprehensive, multilayered and participatory monitoring and evaluation system of the National Roma Integration Strategies. They agreed on a set of suggestions for establishing methodological, administrative and financial framework for robust M&E of the NRISs. (More information see at:

http://www.amalipe.com/index.php?nav=news&id=1234&lang=2).

The implementation of these suggestions at European, national and local level would bring significant improvement in the monitoring framework of the NPIS





www.amalipe.com

THE IMPLEMENTATION OF THE NRIS IN BULGARIA IN 2012: STEPS FORWARD, MISSED AND NEW OPPORTUNITIES

Assessment of AMALIPE Center for Interethnic Dialogue and Tolerance



On December 21, 2011 the Bulgarian government approved the National Strategy of the Republic of Bulgaria for Roma Integration (NRIS) responding to the request of the EU Framework for National Roma Integration Strategies. On May 21st the European Commission published the new communication titled the "National Roma Integration Strategies: A Step Forward in The Implementation of The EU Framework" that assessed the NRISs submitted by 27 Member States and recommended actions to be followed to improve the quality of the strategies and their implementation.

The present paper evaluates the implementation of the National Strategy of the Republic of Bulgaria for Roma Integration in the light of the general and country specific recommendations set by the Communication "National Roma Integration Strategies: A Step Forward in The Implementation of The EU Framework" and its Staff Working Document

DEVELOPMENT OF LEGISLATIVE AND NORMATIVE FRAMEWORK FOR IMPLEMENTATION OF THE NRIS

In 2012, certain developments of the NRIS legislative and normative framework were observed:

1. The Strategy was approved with the Decision of the Parliament: this happened on March 1, 2012. The Strategy passed approval in 7 parliamentary commissions and finally was voted in the Parliament. It is considerable that the National Assembly approved the Strategy unanimously: all voted 'for', no one 'against' or 'abstention'. Even the anti-Roma nationalists preferred to not take part in the session instead of voting against the NRIS. For more information see: http://www.amalipe.com/index.php?nav=news&id=1101&lang=2.

In this way the NRIS became the first Roma integration document approved by the National Assembly¹, which is an important positive development (all previous documents were approved with decisions of the Council of Ministers). In this way the Strategy could oblige and engage broader set of institutions in its implementation, such as municipalities, etc.

At the same time, the Action Plan for NRIS implementation was not proposed for approval in the Parliament although many MPs raised the question about the Strategy implementation and its resources provision. The Action Plan implementation remains the responsibility of the executive power. According to

the Strategy, the implementation will be annually reported in the National Assembly. This provides a chance for a stronger and more diverse monitoring and evaluation framework.

2. A Working Group for suggesting normative changes with regards to the NRIS implementation was created with the Order of the Deputy Prime Minister Tzvetan Tzvetanov on July 25. The group was set at administrative (not political) level; composed by experts from all relevant ministries. Representatives of Roma NGOs were also included in the group. They were elected after a procedure in the National Council for Cooperation on Ethnic and Integration Issues. The Order set the end of December 2012 as the deadline for presenting suggestions for normative changes in the Council of Ministers.

The work of the Group has not been passed smoothly. According to NGO representative most of their essential suggestions were met by passivity and even rejection by the other members of the group (who are experts in different ministries). For example, the NGO suggestions for normative changes that would raise the number of health ensured people were rejected although this was also recommended in the Commission Staff Working Document from May 21, 2012. As a result of this, the NGO representatives in the sub-group for Health care Dr. Stefan Panayotov and Gancho Iliev decided to stop participating in the work of the Group since the consultative process was rather formal and it seemed to miss political will for more profound normative changes. Similar problems were met in the other sub-groups within the Working Group. At the end of December (as well as at present) the Group has not proposed normative changes.

The existence of the Working Group for suggesting normative changes with regards to the NRIS implementation is a positive fact. Nevertheless, its efficiency is very limited because of its composition (the group includes experts without political mandate to take decisions on deeper changes) and the lack of strong political guidance to know what kind of changes could be approved. As a result, at the moment its work is rather technical and does not "promise" significant normative changes.

3. The National Strategy of the Republic of Bulgaria for Roma Integration requires all municipalities to prepare and adopt Municipal Roma Integration Annual Plans. During the second half of 2012 the National Council for Cooperation on Ethnic and Integration Issues (NCCEII) initiated a process to prepare the Municipal Plans. Its necessity was announced during the conference "The National Roma Integration Strategy: One Look at The Next Programming Period", organized by Center Amalipe, the Minister on EU Funds Donchev and the NCCEII on June 15 (http://www.amalipe.com/index.php?nav=news&id=1224&lang=2). In October and November a pilot exercise was implemented in 3 municipalities in the Sofia-district. Ihtiman, Dolna Banya and Slivnitza prepared their Municipal Roma Integration Plans for 2013-2014, and at the same time District Strategy of Sofia-District for Roma Integration 2013-2020 was also prepared and approved. This exercise was steered by the Secretariat of the NCCEII, with participation of all relevant district and municipal institutions, NGOs and Roma activists.

On November 15 the Deputy Prime-minister and Chair of the NCCEII, Tzvetan Tzvetanov, issued an instruction package for preparing Municipal Plans and District Strategies for Roma Integration. The package contains also a template for the required documents. The instructions were announced during the special meeting of Tzvetanov with all district governors on November 15, and were also sent to all municipalities. The instructions envisaged two-stage-process:

- To prepare the Municipal plans for 2013-2014: until the end of January 2013. Later this deadline was extended to the end of February 2013.
- To prepare the Municipal plans for 2015-2020: until the end of 2014.

Until the end of 2012 the NCCEII organized training of municipal and district experts for the preparation of the Municipal plans and District Strategies for Roma Integration (http://www.amalipe.com/index.php?nav=news&id=1430&lang=2). District Working Groups were formed in all 28 districts and Municipal Working

¹ The initial text envisaged the NRIS implementation report to be approved by the Council of Ministers. During the debate in the parliamentary commissions Center Amalipe suggested the annual implementation report to be presented also in the National Assembly. The suggestion was approved by consensus.



BULGARIA

13 "Hristo Botev" St., Veliko Tarnovo, 5000, PO Box 113 tel./fax: (+359) (062) 600224, (+359) 0888 681134 e-mail: center_amaline@yahoo.com

CENTER AMALIPE CENTER FOR INTER-ETHNIC DIALOGUE AND TOLERANCE

www.amalipe.com -

Groups were established in most of the municipalities. According to the Instructions they incorporated representatives of district / municipal institutions and NGOs. Experts from the Secretariat of the NCCEII and Roma NGO representatives consulted actively the District / Municipal Groups. Although the process is still not completed, by the end of 2012 all districts and the big majority of municipalities have started the preparation of their District Strategies / Municipal Plans for Roma Integration.

The efforts to prepare the Municipal plans / District strategies for Roma integration are a step forward for engaging broader set of stakeholders, especially for engaging the local power that is crucial for making a difference in the entire integration process. It seems that the NCCEII and its chair Tzvetanov intend to have Municipal plans / District strategies with good quality and there is a strong political support for this. At the same time, certain weaknesses appeared even at this early stage:

- 1. There are no financial resources allocated for preparing these documents. It is expected that municipal and district administrations, NGOs and other stakeholders will participate in the process on voluntary basis and will use the information they have gathered before (within census, surveys and other means). In this way, the preparation process most probably would not bring new information and ideas but rather would summarize the existing ones. Most probably the added value of the documents would be limited to political messages and strategic intentions at the local / municipal level but not a profound analysis of the situation:
- 2. There is no vision for "fresh" (i.e. extra-) financial resources for implementing the Municipal plans, especially regarding the first exercise (Plans 2013-2014). The municipalities will not receive extra money to implement their integration activities but they are expected to dedicate money within their ordinary budgets. This approach proved to be inefficient at the national level during the previous 2 decades and there is no reason to expect better efficiency at the municipal level. Most probably the documents prepared would summarize mainstream activities implemented by the certain municipality with only few and limited Roma targeted activities. This means that the Municipal plans would be pedagogical rather than planning documents. This weakness was indicated regarding the NRIS Action Plan and it seems to be repeated regarding the Municipal Action Plans 2013-2014.
- 3. The participation of Roma community is recommended but not ensured. Although, the instruction package recommends Roma organizations and leaders to be included in the working groups, this could not ensure the effective Roma participation. It seems that only in the case of existing strong NGO or CBO plus existing good will by the side of the municipal/district administration that is in charge of preparing the document, ensures the real Roma participation could happen. Unfortunately this coincidence could happen only in certain cases and lacks in the big majority of the municipalities. The instruction package does not require special activities for informing the local Roma communities and for raising their activeness. No resources are dedicated for this purpose. Most probably this will mean that the real Roma participation would happen rather as an exception.

Example: In 11 municipalities in Bulgaria (Byala Slatina, Kneia, Paylikeni, Veliko Turnovo, Strajitza, Novi Pazar, Kameno, Radnevo, Peshtera, Etropole and Dolna Banya) Center Amalipe has established Community Development Centers (CDCs) as a mode for strengthening the self-organization, empowerment and development of the local Roma communities. Since June the CDCs and Amalipe initiated a participatory process for the preparing of the Municipal Roma Integration Plans. In June, training of local activists in every municipality was organized to get them informed, to brainstorm ideas for Municipal plans and to make them engaged with the process. At the end of July a special camp was organized for municipal officials, other stakeholders (school principals general doctors), Roma leaders and community moderators from the CDCs. They were informed about the necessity for preparing Municipal Roma Integration Plans and started to think together how to organize the process at the municipal level (see http://www.amalipe.com/index.php?nav=news&id=1265&lang=2). In September the community moderators from CDCs organized local meetings in the biggest villages in these 11 municipalities to inform the local communities and to get them involved. This participatory process gave good results. One of the municipalities – Dolna banya – was included in the pilot exercise in October - November and was pointed by Tzvetanov as the best example for preparing the Municipal Roma Integration Plans. In 9 out of 11 municipalities with CDCs the communities were activated and managed to influence the process.

It could be concluded that when targeted activities for activating the local communities are undertaken and resources are directed, the results are more than promising.

FOR RAISING THE EFFECTIVENESS OF THE NEXT MUNICIPAL ROMA INTEGRATION PLANS (2015-2020) CERTAIN STEPS SHOULD BE UNDERTAKEN:

- 1. A clear and strong political guarantee that the Municipal Plans will be financially backed up with specific funds that are an addition to the set in placed municipal budgets. The most realistic option is for these funds to be provided by Human Resources Development OP, Regional Development OP and the Rural Areas Development Program. Funds from the state budget are also necessary. To ensure this, the Bulgarian government should initiate:
 - To include the existence of the Municipal Roma Integration Plan as ex-ante conditionality before every municipality that intends to absorb funds from HRDOP, RDOP and RADP;
 - To include in the HRD OP priority area or priority axes "Integration of Marginalized Communities Such as Roma" and the indicative activity "Multilateral Projects for Implementation of Municipal Roma Integration Plans". In this way the Municipal Plans 2015-2020 would be prepared in a much more effective way in order to become the necessary basis for multilateral Roma integration municipal projects.
 - To include in the RD OP and in the RADP delegated budgets for the implementation of the "hard components" of the Municipal Roma Integration Plans.
 - To include in Good Governance OP or in HRD OP funds for assigning Roma NGOs at regional basis to implement activities for pioneering the local Roma communities (developing CDCs, campaigns at grassroot level, etc.) and funds for capacity building of the Roma organizations.
- To allocate specific funds for the preparation of the Municipal Roma Integration Plans 2015-2020. This could be done within the present Administrative capacity OP or the future Good Governance OP.
- 3. To employ more specific attention at ensuring the real Roma participation during the process of preparing the Municipal Roma Integration Plans 2015-2020
- DEVELOPMENT OF INSTITUTIONAL FRAMEWORK FOR THE IMPLEMENTATION OF THE NRIS

As outlined in Amalipe's assessment of the NRIS from February 2012, Part "VII. Mechanisms For The Implementation of The Integration Policy" from the Strategy, re-affirms the existing institutional framework and division of responsibilities. The institutions of the executive power maintain their role to manage the integration policy in a certain field (for example, Ministry of education is responsible for educational integration, etc.). The coordinating role of the National Council for Cooperation on Ethnic and Integration Issues is also re-affirmed. The Strategy calls for "forming and maintaining the necessary administrative capacity in the key responsible institutions" that is an obvious need since taking into account the lack of any administrative infrastructure that deals with Roma integration in the key ministries at the present. In fact, the NRIS only re-affirms the institutional infrastructure for Roma integration at central and municipal levels without developing it in one of the two possible directions: establishing body / institutions with managing responsibilities (not only coordinating ones) or forming administrative units that deal mainly with Roma integration with the focal institutions. The only exception was a sentence in the Action Plan that envisaged a political level Inter-Ministerial Working Group for Resources Provision of Roma Integration to be established under the patronage of the Minister on EU Funds.

During 2012 the only significant change in the institutional framework for the NRIS implementation was that the Working Group for Resources Provision of Roma Integration was formally established with the order of the Prime Minister P-193/02.08.2012. The Group is established at a political level: it is lead by the Minister on EU Funds Donchev and is composed by Deputy-ministers and executive directors who oversee the Managing authorities and Intermediate bodies. This is an important asset and precondition for taking important political decisions. Another important asset is that the Group incorporates also representatives of Roma NGOs elected after a special nomination procedure. In this way the Roma participation in this political level Group is guaranteed. (For more information go at:

http://www.amalipe.com/index.php?nav=news&id=1275&lang=2).



Hristo Botev" St., Veliko Tarnovo, 5000, PO (Hristo Botev) St., Veliko Tarnovo, 5000, PO (Hristo Botev) (14359

SPECIAL*

FOITION

www.amalipe.com

During the last 4 months of 2012 the Group started active work in two important directions:

- To ensure standardized financial instruments for integration. The idea to prepare methodology and financial standards for several models called "Integration Interventions" was proposed by the Roma NGOs and approved by the Group. In addition, during the session from December 11, 2012 the Group approved the first two Integration Interventions, namely the Community Center and Intervention for Decreasing the Early School Drop-Out-Rate (more information see at: http://www.amalipe.com/index.php?nav=news&id=1413&lang=2). Methodology and financial standards will be prepared for these interventions as well as for several more. After this, funds for their concrete utilization will be ensured with the support of HRDOP, REDOP, RADP.
- To update and approve the Appendix "Programs for Implementation of The NRIS". As pointed in Amalipe's assessment of the NRIS from February 2012 the Appendix was the most concrete part of the NRIS. Nevertheless, it was not approved (neither rejected) by the Council of Ministers and its status was rather unclear. During 2012 Amalipe and the other Roma organizations brought out to the surface the status of this Appendix. During its session on October 31, 2012, the Working Group for Resources Provision of Roma Integration decided by consensus to update the Appendix
- (http://www.amalipe.com/index.php?nav=news&id=1359&lang=2) In December 2012 an updated version was prepared and in January 2013 all ministries provided feed-back on it. It is expected that the final version will be approved by the end of February or the beginning of March 2013.

Unlike these positive developments, very few were done for developing the institutional set-up for the Roma integration. The key ministries did not develop its capacity for managing Roma integration. The only positive development was that Ministry of Education started to invest in the Center for Educational Integration of Children and Students from the Ethnic Minorities (that is a structure of MoE) including the Centers in projects financed by HRD OP and Bulgarian-Swiss Cooperation.

It seems that the key ministries and other institutions with managing responsibilities would not further develop their institutional set-up for Roma integration. Investing in Roma targeted structures (as the NCCEII and its Secretariat, the Center for Educational Integration of Children and Students from the Ethnic Minorities, as well as in the Working Group for Resources Provision of Roma Integration and its possible administrative unite) seems as a more useful option at present.

DEVELOPMENT OF FINANCIAL FRAMEWORK FOR IMPLEMENTATION OF THE NRIS

State budget: Special budget allocations for implementing the NRIS were not included in the state budget for 2012. Unfortunately, such item was not envisaged also in the Budget 2013. This is a discouraging sign for a low political engagement.

The only modest support from the state budget for Roma integration activities was for:

- The implementation of the Health Strategy for People Belonging to Vulnerable Ethnic Minorities. The Action Plan for this Strategy, approved in July 2011, envisaged 1,051, 000 BGN (or 539,000 Euros) for 2012, to be provided by the State budget. Unfortunately even this modest amount was not fully absorbed. The Ministry of Health did not organize the necessary public tenders at time and most of the money was not taken in.
- State delegated financing for the work of Roma health mediators. This important achievement remained in 2012. The state budget provided financing for 105 mediators; exactly the same number as in 2011 although much bigger need to increase the number was identified.
- Financing for the work of the Center for Educational Integration of Children and Students From The Ethnic Minorities. The amount did not exceed the amount from 2011.

European Funds: HRDOP and partly RDOP continued to be the highest (although still modest) source for financing the Roma integration policy. This was done mainly through the Roma / minorities targeted aims and in much lesser degree through the mainstream aims. In 2012 five Roma targeted aims were implemented within HRD OP and a new was approved. Within RDOP one targeted aim was in its preparatory stage of implementation. Two assets could be outlined:

- For the first time multilateral and multi-funded operation for Roma integration was prepared and approved. This was the operation for social housing for marginalized communities initiated by the Minister on EU funds Donchev. The operation combines "hard component" (building social houses) financed by RDOP with "soft component" (improving the access to labor market, general education and VET, social and health care services) financed by HRDOP. Since the operation is still in its preparatory stage, it is not possible to analyze its implementation. Nevertheless, the design is good.
- There is an improvement in the engagement of the Managing authorities and Intermediate bodies to announce Roma targeted aims. 4 out of 5 targeted aims implemented in 2012 were proposed by the representative of Roma NGOs in the HRDOP Monitoring Committee; Deyan Kolev in 2009 and 2011. Initially there were a lot of objections by the side of HRD OP Intermediate bodies (and even by the side of the Managing authorities) to have minorities / Roma targeted aims. Gradually these objections were partly overcome and in 2012 the institutions suggested to increase the budget of 2 aims.

As an important weakness it could be pointed out that the RDOP continued to stay aside from the topic of Roma integration and to not contribute for the implementation of the NRIS; although 60 % of Roma in Bulgaria live in rural areas. The only modest RDOP contribution was in certain cases when municipalities and NGOs prepared projects directed at Roma.

The MtM Consortium in Bulgaria and Center Amalipe helped certain rural municipalities to prepare Strategies for Local Development within the LEADER approach that include Roma as a specific target group. Some of them were financed by the Ministry of Agriculture. It seems that this is the only structural contribution of RADP to the integration of Roma in the rural greas.

In 2012 two additional European (but not EU) sources prepared to contribute for the implementation of NRIS. These were:

- EEA Financial Mechanism & Norwegian FM (http://eufunds.bg/en/page/22). In 5 Priority fields in contains the requirement for at least 10 % of the money to be dedicated to the Roma people. In 2012 these priority areas were still in its preparatory stage and did not contribute to the field. Nevertheless, most of the operators undertook consultations with NGOs regarding their concrete priorities. This is a positive fact.
- Swiss Contribution to Bulgaria (http://eufunds.bg/en/page/20).It has a specific Roma component. In 2012, Project Management Unite for this component was chosen after a long selection procedure. This was DG "Structural funds" within the Ministry of Labor and Social Policy. The fact that no institution with a focus on Roma in Bulgaria was selected by the Swiss government to be the Managing body for the Roma component is a proxy-indicator that these institutions need serious capacity building.

We can conclude that no financial framework for NRIS implementation was built in Bulgaria in 2012. The state budget is not engaged. The support of the European funds is a positive fact but it is limited in the scope and the extent that it does not follow systematic framework. Its directions are rather shaped by the activeness of Roma NGOs and the good will of certain Managing authorities / Intermediate bodies. The possible approval of the Appendix "Programs for Implementation of The NRIS" could change this situation by engaging the European financial support as well as the state budget support with the implementation of NRIS in a systematic way.

NRIS AND THE EU FUNDS PROGRAM FOR THE NEW PLANNING PERIOD

In 2012 Bulgaria started to prepare its programs for the next planning period. The process is managed by the respective Managing authorities and by the Minister on EU funds. Until the end of 2012 the Partnership Contract, the HRD OP and RD OP had first or second / third draft; the RADP and some other programs begin the process in 2013.