



MINISTRY OF REGIONAL DEVELOPMENT
AND PUBLIC ADMINISTRATION



ROMANIA BULGARIA



Interreg 

MINISTRY OF REGIONAL
DEVELOPMENT AND
PUBLIC WORKS



DECISION no. 22
of 11th of May 2018

Regarding the complaints lodged against the Monitoring Committee Decision no. 72 of 22nd of March 2018, approving the List of approved and rejected projects submitted under the third call for proposals for the Interreg V-A Romania-Bulgaria Programme - deadline 23rd of October 2017,

Having regard to the following:

- Monitoring Committee Decision no. 51 of 2nd of August 2017 approving the Complaint Panel for the Eols and full applications submitted under the 3rd call for proposals, priority axes 1-3, Interreg V-A Romania-Bulgaria Programme, step 1 and 2,
- The Complaint Procedure of Interreg V-A Romania-Bulgaria,

the Complaint Panel of Interreg V-A Romania-Bulgaria Programme has adopted this:

DECISION

Article 1. The present document rejects the complaint lodged by Yatrus Foundation, lead beneficiary of the project "Virtual Reality for Tourism" - code 258 and registered by CBC ROC with the number 7130/16.04.2018, appealing the rejection of the project by the Monitoring Committee.

Article 2. The applicant provided a self-assessment of the application. Although the received scores were contested, the applicant did not provide information regarding the scores resulted from the self-assessment.

- a) On criterion Q4 - granted score by the assessors is 3 points. The applicant has provided a Matrix with information and calculus without specifying which will be the score for the respective criterion from the provided self-assessment.

Based on the information provided within AF, the project proposal declares contribution to Programme output indicator I9 "Number of integrated tourism products/services created" with 3 tourist products, which represents 6.99% of the Programme Target to be reached, using 1.44% of

the available funds. The project proposal declares contribution to Programme output indicator I10 "Number of common strategies, policies or management plans for valorising (including raising awareness) the cultural and natural heritage through its restoration and promotion for sustainable economic uses" 1 common strategy, which represents 4.35% of the Programme Target to be reached, using 1.44% of the available funds. During the evaluation process, a request for clarification was submitted regarding the unjustified increase of the contribution to indicators from Eol stage, when it was declared that 1 tourist product will be created while within the full AF, 3 integrated tourist products were considered without specifying what exactly these 3 integrated touristic products represent. The applicant stated that the 3 integrated tourist products are the following: 1. the tourist centers of the future; 2. the content created for the tourist virtual centers; 3. mobile stations for production and advertising of virtual products. According to the presented information and the definition included within the AG related to the meaning of "Integrated tourist product", it was concluded that these 3 "products" are an integrated part of one product - The tourist centres of the future, as the content created for the virtual centers is undividable part of it. Moreover, according to the information included in the response to clarification, regarding the location of the tourist centers, the applicant has replied that central parts of the cities will be chosen and the equipment can be assembled for 3 to 5 days and the current given address can be changed by the applicant at any given point. This leads to the conclusion that there can be a difference between the tourist center and the mobile stations, nevertheless, the information is not presented in clear manner. Therefore, the contribution to indicator I9 was considered overestimated and 1 integrated tourist product will be created by the project proposal, namely the tourist centers of the future. The information provided by the applicant within the AF and the response to the clarification regarding the contribution to the output indicators is not sufficient and a proper justification for the modification was not provided.

Analyzing the provisions of the Assessor's Guide regarding the scoring for this criterion, 3 points are to be granted if *"3-4 points - unsatisfactory evidence and measurement of the project contribution to the accomplishment of at least one of the outputs proposed (the description does not present enough reliable justification how the project will contribute to the relevant axis/objective in correlation with indicative budget and expected outputs by activities; the description of the activities has no clear reference between the financial resources needed by activity and the listed outputs)"*, corroborated with information regarding the scoring from the assessment grid (Annex C - Evaluation Grids of the Application Form of the Applicant's Guide) "Points between 0 and 10 can

be granted, based on the opinion of the assessors on the extent to which the project is contributing to the indicators, the Complaint Panel rejects the complaint for this criterion.

- b) On criterion Q5 - granted score by the assessors is 0. The applicant has not provided information regarding the score resulted from self-assessment. The applicant claims that the project proposes at least two green solutions, namely the digitization and the purchase of a photo voltaic system. Nevertheless, these activities are not presented within the AF as being green solutions. Regarding the purchase of the photovoltaic system, the information provided within the AF states that "MOBILE PHOTOVOLTAIC SYSTEM - Field work may require sleeping in nature with tents, in the absence of a charging system with which all technical devices work. This decision makes the digital product manufacturing team completely independent". It results that this system is not actually described as a green solution and more like necessary if the project team needs to sleep in nature with tents.

Analyzing the provisions of the Assessor's Guide, the Complaint Panel rejects the complaint for this criterion.

- c) On criterion Q6 - granted score by the assessors is 1. The applicant has not provided information regarding the score resulted from self-assessment. According to the provisions of the AG, *Joint staffing* - means that the project should not duplicate functions on either side of the border. Therefore, regardless of where the person is located, there should be one joint project manager, one joint financial manager etc., (of course more staff may be required for larger projects). These staff will be responsible for project activities on both sides of the border. The Lead Beneficiary is generally the employer of core project staff. Based on the information provided within AF, AWG clarification letters and the provided responses, it was considered that the Joint staffing criterion was not fulfilled.

Analyzing the provisions of the Assessor's Guide corroborated with the information regarding the scoring from the assessment grid for this criterion, which states that "*there will be granted 2 points for projects accomplishing all 4 cooperation criteria and the projects accomplishing only 3 cooperation criteria will be granted with 1 point*" (Annex C - Evaluation Grids of the Application Form of the Applicant's Guide), the Complaint Panel rejects the complaint for this criterion.

- d) On criterion Q7- granted score by the assessors is 0. The applicant has not provided information regarding the score resulted from self-assessment. The applicant states as justification for granting of 2 points that "This judgment does not take into account the set in the application form goals, activities, events. It refuses to consider Annex A.F.1 COST BENEFIT ANALYSIS. The project is created to be CBC and without being such, it loses

its value. We are the only ones we know of that planned a digital strategy for the eligible regions of Bulgaria and Romania for the two program cycles. The project foresees a minimum of twenty meetings with a minimum of 250 participants (at the policy-making stage and a coherent strategy according to the bottom up approach). At implementation stage, it could have helped to dozens of SMEs from the CBC region and give them the opportunity to place attractive content, as well as providing a direct link and order for a hotel, restaurant, tourist service. Many hotels, restaurants, sports clubs will become known in Bulgaria and Romania. In addition to a huge cross-border impact, there is a huge transnational impact. All planned project activities indicate measures show cross-border impact. Furthermore, we clearly explained in the application form that the content we were going to create for the tourist centers would be based on the history and culture of the whole CBC region". According to the information provided within the AF it was considered that a common challenge is addressed in the programme area, still it cannot be considered that the added value of project is showing a strong cross border character. The minimum criteria foreseen by the regulations (2+1 joint criteria) is fulfilled.

Analyzing the provisions of the Assessor's Guide regarding the scoring for this criterion *"there will be granted score between 0 and 2 points, based on the opinion of the assessors on the extent to which the project is showing a strong cross border character"*, corroborated with information regarding scoring from the assessment grid (Annex C - Evaluation Grids of the Application Form of the Applicant's Guide) *"The baseline (0 points) is when the minimum criteria foreseen by the regulations (2+1 joint criteria are fulfilled) and the target (maximum) is when the project shows that a wider joint problem is tackled by the project with a joint solution which brings benefits to the border area."*, the Complaint Panel rejects the complaint.

- e) On criterion Q9 - granted score by the assessors is 0. The applicant has not provided information regarding the score resulted from self-assessment. The applicant states that *"we give equal opportunities for men and women to participate in our project as volunteers in the teams we intended to create or as visitors to the tourist centers. However, creating digital products which we have envisioned as part of the activities of our project allows flexible worktime and thus provides women with the opportunity for easier reconciliation of personal and professional life. The envisaged measures concern all project activities."* Following the analysis of the AF, it can be concluded that the applicant does not provide any relevant specific measure for equality between men and woman, only the ones required by law.

Analyzing the provisions of the Assessor's Guide regarding the scoring for this criterion *"there will be granted between 1 point and 0 points, were 1 point represents at least one specific measure foreseen"*, corroborated with information regarding scoring from the assessment grid (Annex C - Evaluation Grids of the Application Form of the Applicant's Guide) *"1*

point if at least one specific measure is foreseen; 0 points if only neutral (minimum required by law) measures are foreseen", the Complaint Panel rejects the complaint for this criterion.

- f) On criterion Q10 - granted score by the assessors is 0. The applicant has not provided information regarding the score resulted from self-assessment. The applicant quotes the European Parliament resolution of 29 October 2015 on new challenges and strategies for stimulating tourism in Europe (2014/2241 (INI) in order to fundament its complaint. Nevertheless, when analyzing the information provided within the AF, the project is not proposing any relevant specific measure for promotion of sustainable development, only the ones required by law.

Analyzing the provisions of the Assessor's Guide regarding scoring for this criterion *"there will be granted between 1 point and 0 points, were 1 point represents at least one specific measure foreseen", corroborated with information regarding scoring from the assessment grid (Annex C - Evaluation Grids of the Application Form of the Applicant's Guide) "1 point if at least one specific measure is foreseen; 0 points if only neutral (minimum required by law) measures are foreseen", the Complaint Panel rejects the complaint for this criterion.*

- g) On criterion Q 14 - granted score by the assessors is 4,5 points. The applicant has provided an "ornogram" without specifying which will be the score for the respective criterion from the provided self-assessment. The applicant states that "the logical frame is visible when drawing the ornogram. It is easy to see from each European audit authority the links between challenges, goals, activities and outcomes. The project covers almost all specific objectives of Priority Axis 2, it refers to European and national regulations that are in line with the project specificity. The project is innovative and creates "new tourist products" that are not currently available in CBC. For the first time, a new type of STRATEGY - a digital strategy is being proposed that practically INTEGRIZES both types of outputs (6c.2 - Number of common strategies, policies or management plans for valorisation and 6c.1 - Number of integrated tourism products / services created). In addition, a digital marketing strategy for will be presented in a version of Semantic Web 3.0, which is not currently available in CBC." Based on the information provided within AF, the AWG clarification letters and provided responses, it was considered that the project is not well structured and the logical link between problems, objectives, resources, activities, outputs and results is weak. A lot of the information provided in the AF has a general character and is not relevant.

Analyzing the provisions of the Assessor's Guide regarding scoring for this criterion *"The project is appropriately structured and shows strong and convincing logical link between problems, objectives, resources, activities, outputs and results - 15 points; Although the project structure is not*

appropriate enough the logical link between problems, objectives, resources, activities, outputs and results is considered satisfactory - 10 points; The project is not well structured and the logical link between problems, objectives, resources, activities, outputs and results is weak - 5 points; The project is not appropriately structured and there is no link between problems, objectives, resources, activities, outputs - 0 points.", corroborated with information regarding scoring from the assessment grid (Annex C - Evaluation Grids of the Application Form of the Applicant's Guide), the Complaint Panel rejects the complaint for this criterion.

- h) On criterion Q15 - granted score by the assessors is 4,5 points. The applicant has not specified which will be the score for the respective criterion from the provided self-assessment. The applicant's opinion is that there is no logical link between Q15 and the comments of the assessors. The assessors scored the initial information provided in the Application form, the clarifications were made in order to understand some issues which were not properly explained. Based on the information provided within AF, AWG clarification letters and provided responses, it is concluded that the description of the activities is not satisfactory but they seem achievable and therefore the project could be considered as consistent from technical point of view.

Analyzing the provisions of the Assessor's Guide regarding scoring for this criterion *"there will be granted score between 0 and 15 points, as follow: The project is realistic and consistent from a technical point of view, its activities are clearly described, realistic and achievable - 15 points; The project is realistic and consistent from a technical point of view, its activities are realistic and achievable but could be better structured and described - 10 points; The description of the activities is not satisfactory but they seem achievable and therefore the project could be considered as consistent from technical point of view - 5 points; The activities are not well described and the project seems unrealistic and not consistent from a technical point of view - 0 points"* corroborated with information regarding scoring from the assessment grid (Annex C - Evaluation Grids of the Application Form of the Applicant's Guide), the Complaint Panel rejects the complaint for this criterion.

- i) On criterion Q17 - granted score by the assessors is 0. The applicant has not specified which will be the score for the respective criterion from the provided self-assessment. The applicant declares in the section "Target groups" that the project aims to reach the full population of the region (2,750,000 people). In the argumentation, they state that: "The project accepts that all citizens of both countries have access to the Internet and they are potential beneficiaries in different qualities: business owners, employees, students etc." Furthermore, the information continues with: "Their participation can be traced through the visits to the ready-made WEB platform. It is expected to be fully prepared at the 15th month of project implementation, with visits estimated at around 50,000 by the end of the project." This way, the applicant gives confirmation only for about 50,000 visitors per year to the platform, or in total 250,000 by the end of

the sustainability period of the project, which is very far from the declared 2.75 million.

Analyzing the provisions of the Assessor's Guide regarding scoring for this criterion "*0 points - there is no relevance between the number and the type of the information tools and the indicative number and type of the target groups planned to be reached and involved in the project; 1 point - there is partial relevance between the number and the type of the information tools and the indicative number and type of the target groups planned to be reached and involved in the project; 2 points - there is full relevance between the number and the type of the information tools and the indicative number and type of the target groups planned to be reached and involved in the project.*" corroborated with information regarding scoring from the assessment grid (Annex C - Evaluation Grids of the Application Form of the Applicant's Guide), the Complaint Panel rejects the complaint for this criterion.

- j) On criterion Q19 - granted score by the assessors is 5 points. The applicant has not specified which will be the score for the respective criterion from the provided self-assessment. Based on the information provided within Application form, it was considered that the project results can be achieved and measured with the proposed activities scope, schedule and budget, but there is a weak or only general description presented. The project contributes to one result indicator « Number of tourist overnights in the CBC region) with 10.000, which represents 1.11% of the target result indicator to be achieved by the present call. The Beneficiaries claim that accordingly to Cost Benefit Analysis the number of the tourist overnights until 2023 will be 93.000.

Analyzing the provisions of the Assessor's Guide regarding the scoring for this criterion "*there will be granted score between 0 and 10 points, as follow: 0 points - the project results cannot be achieved and measured with the proposed activities scope, schedule and budget and there is no evidence mentioned; 1-3 points - the project results could be achieved and measured with the proposed activities scope, schedule and budget but the planning is risky and there is not enough evidence how the results will be achieved; 4-6 points - the project results can be achieved and measured with the proposed activities scope, schedule and budget and there but there is weak or only general description presented; 7-9 points - the project results can be achieved and measured with the proposed activities scope, schedule and budget but the descriptions are not enough detailed and coherent; 10 points - the project results can be achieved and measured with the proposed activities scope, schedule and budget and these are proven by detailed and coherent descriptions*", corroborated with information regarding scoring from the assessment grid (Annex C - Evaluation Grids of the Application Form of the Applicant's Guide), the Complaint Panel rejects the complaint for this criterion.

- k) On criterion Q21 - granted score by the assessors is 2 points. The applicant has not specified which will be the score for the respective criterion from the provided self-assessment. Based on the information provided within AF, AWG clarification letters, provided responses, it was considered that the AF offers a general (raw) description of the correlation between the target groups needs and the problems tackled by the project activities.

Analyzing the provisions of the Assessor's Guide regarding scoring for this criterion *"0 points - no correlation between the target groups needs and the problems tackled by the project activities; 1 point - weak explanation of the correlation between the target groups needs and the problems tackled by the project activities; 2 points - general (raw) description of the correlation between the target groups needs and the problems tackled by the project activities; 3 points - detailed description of the correlation between the target groups needs and the problems tackled by the project activities."*, corroborated with information regarding scoring from the assessment grid (Annex C - Evaluation Grids of the Application Form of the Applicant's Guide), the Complaint Panel rejects the complaint for this criterion.

- l) On criterion Q23 - granted score by the assessors is 9 points. The applicant has not specified which will be the score for the respective criterion from the provided self-assessment. Based on the information provided within AF, AWG clarification letters and provided responses it was considered that correlation between activities and budget exists and the budget is sufficiently justified. Analyzing the provisions of the Assessor's Guide regarding scoring for this criterion *"there will be granted score between 0 and 15 points, as follow: 15 points in case there is a full correlation between activities and budget and the budget is very well justified; 10 points in case sufficient correlation between activities and budget exists and the budget is sufficiently justified; 5 points in case there is a proposal to reduce the total budget of the application of minimum 30 % and maximum 50%; 0 points in case the activities and the budget are not correlated or the budget is proposed to be reduced more than 50% of the initial proposal."*, corroborated with information regarding scoring from the assessment grid (Annex C - Evaluation Grids of the Application Form of the Applicant's Guide), the Complaint Panel rejects the complaint for this criterion. Awarded score was based on the initially provided information.

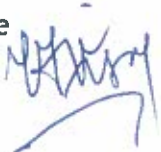
Article 3. The decision of the Complaint Panel is final, binding to all parties and not subject of any further complaint proceedings within the Programme.

Signed by

Members of the Complaint Panel

Member 1 of Complaint Panel - Managing Authority representative, Ministry of Regional Development and Public Administration, Romania

Signature



Member 2 of Complaint Panel - National Authority representative, Ministry of Regional Administration and Public Works, Bulgaria

Signature



Member 3 of Complaint Panel - External expert (from the Evaluation Unit), Ministry of Regional Development and Public Administration, Romania

Signature

