12 Administrative and political embeddedness

How to improve the institutional environments dealing with the management and implementation of EU Structural and Investment Funds? The experience of new member states¹

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Introduction

Time and time again, administrative capacity has been identified as a key feature of the successful management and implementation of EU funds. However, the capacity of national authorities to implement European funding instruments varies from country to country and from region to region. The integration of Central and Eastern European countries into the EU has contributed to an increase in this variation. Different styles of management, issues of public administration and a lack of experience have generally affected the ability of new member states to manage funding. Many studies have examined the administrative capacity of EU member states vis-à-vis European Cohesion Policy implementation (Boeckhout et al., 2002; Horvat and Maier, 2004; Sumpíková et al., 2004; Milio, 2007; Bachtler and McMaster, 2008; Bachtler et al., 2013; Ferry, 2013; Petzold et al., 2015). Recently, new correlations have emerged between the quality of governance in EU countries and their capacity and performance to absorb EU funds (Boijmans. 2013; Charron et al., 2014). As a consequence, it is often hinted that "good governance" can play an important role in this respect (European Commission, 2014). As emphasized by the sixth European Cohesion report, good governance may be an underlying condition necessary for sustained economic and social development, as well as for a modern public administration (European Commission, 2014: 160-1). However, little remains known about the formal and informal dimensions of domestic governance and the role and influence of political factors over formal mechanisms for the management of EU Structural Funds (SF). At the same time, there is little discussion about the institutional environment in which Managing and Control Institutions² are embedded.

Consequently, this chapter investigates the extent to which domestic governance interferes with the development of administrative capacity. It questions, in theoretical and practical terms, how issues of domestic governance may affect administrative capacity processes and the domestic institutional actors

in charge of the implementation. The chapter provides a snapshot of some of the domestic barriers affecting the management of EU funding. It does so by developing the concept of administrative and political embeddedness in order to explain why the environment in which Managing and Control Institutions are situated matters.

Reflections are based on an analysis of qualitative evidence gathered from two new member states, Bulgaria and Romania. More than 60 in-depth, semi-structured interviews were carried out over the course of 2013 and 2014, with representatives from Managing and Control Institutions in both countries as well as with Brussels-based officials. Several interviewees provided valuable evidence on how the domestic political and administrative environment shapes the overall administrative capacity of the countries and determines shortcomings at the different stages of the absorption process. It is this type of evidence that may help us to grasp some of the mechanisms that affect national implementation systems. This evidence was corroborated with a detailed analysis of key primary documents such as national implementation reports, audit reports and external evaluations, as well as of a digest of media coverage on EU funds in both countries and the reports of different civil society stakeholders on the subject.

The chapter is structured as follows. After a brief presentation of some of the theoretical debates on administrative capacity and governance, the main section defines and provides empirical instances of administrative and political embeddedness. The concluding section sketches several recommendations for how to counteract the effects of these factors. Some of the measures discussed may be essential to improve the performance of policy instruments such as the EU Structural and Investment Funds during the 2014–20 period.

Administrative capacity and governance: an ever-growing link

Administrative capacity is a key concept in the specialized literature dealing with Cohesion Policy implementation and with the governance of Structural and Cohesion Funds. Its theoretical development can enable policymakers and practitioners to further understand why some Managing and Control Institutions or beneficiaries have been more successful than others in implementing EU-funded projects. There is a growing body of evidence with regard to the implementation of SF based on the experience of Central and Eastern European countries (Horvat and Maier, 2004; Sumpíková *et al.*, 2004; Bachtler *et al.*, 2013; Ferry and McMaster, 2013; Dabrowski, 2014; Surubaru, 2014). Similarly, at the national level in the two countries under discussion, several analysts have examined the key obstacles and deficiencies for SF implementation (Georgescu, 2008; Zaman and Georgescu, 2009; Berica, 2010; Cace *et al.*, 2010; Stefanov *et al.*, 2010; Zaman and Cristea, 2011; Tsachevsky, 2012; Hristova Kurzydlowski, 2013).

On the one hand, there are more and more studies that seek to define what administrative capacity is in relation to the management of EU funds (Boeckhout *et al.*, 2002; Milio, 2007; Petzold *et al.*, 2015), although there is no universally accepted definition of the term (Addison, 2009). Some see administrative capacity as the "organizational structures, adequacy and quality of human resources and administrative adaptability" employed by states at the different stages of the absorption process (Bachtler *et al.*, 2013: 14). Others envision administrative capacity as "an essential component of good governance, although not limited only to it" (Marinov, 2011: 20). With all this, the boundaries and inter-linkages between administrative capacity and governance are still an important source of debate.

On the other hand, the growing debate on the governance of EU funds and the potential impact of Cohesion Policy has recently been acknowledged by the Barca report (2009), which provided evidence to policymakers of the increasing role of governance. Other reports have stressed that there is a need for strong continuity of staff working in the specialized bodies dealing with EU funds and a quality-oriented administration (World Bank, 2006: xii). In order to foster this, there needs to be a smooth relationship between the administrative and the political level (World Bank, 2006: xii).

Specifically, Charron *et al.* (2014) argue that there is a strong link between the quality of regional governance and administrative capacity. Rodríguez-Pose (2013) points to the way in which formal and informal institutional settings influence the environment for policy implementation. In addition, Dotti (2013) argues that the weakness of the EU institutional framework, combined with differential multi-level governance settings across the EU, as well as domestic political context and factors, adds to the complexity of managing the funds. Studying the Italian case, Milio (2008) is among the few scholars who have pointed to the importance of domestic political factors for creating an environment conducive to the successful implementation of the policy. More recently, it has been suggested that good governmental capacity accounts for a better absorption performance, specifically for the European Regional Development Funds (Tosun, 2014). Finally, political support has been identified as a key variable that may explain the differences in capacity and performance within and between new member states (Surubaru, 2014).

In parallel, the immense body of literature on post-Communist politics and transition underlines the strong grip of informal networks and clienteles on economic and political outputs (Dimitrova, 2010; Ganev, 2013). Moreover, the importance of administrative traditions and political leadership (Eriksen, 2007) and the slow pace of public-sector reforms (Verheijen, 1999) have crippled the potential for developing strong institutions. Consequently, 25 years since the fall of the Communist system, it may be argued that socio-political conditions and weak institutions have provided a significant handicap for new member states as regards the management of external aid. With all this, the strong variation between Central and Eastern European countries when it comes to the overall absorption of funding remains puzzling. For instance, Estonia, Lithuania and Poland are among the most efficient

with regard to the absorption of funds. Researching how administrative capacity may interact with domestic governance and institutional arrangements has become a critical area of inquiry in order to understand issues of performance.

The underlying assumption of this inquiry is that the political and administrative spheres affect the different stages of the absorption process. Understanding how technocratic issues specific to the absorption of EU funds may interact with domestic political factors can help us to specify how the latter impact on administrative capacity. Whether positive or negative, political factors do play a key role and should be more properly accounted for in analyses of the implementation of EU Cohesion Policy, as advocated by several authors (Milio, 2008; Surubaru, 2014).

Administrative and political embeddedness: what is it and how is it manifested?

This chapter's main contribution is to highlight instances of what is defined as administrative and political embeddedness in relation to EU Cohesion Policy management. "Embeddedness", be it administrative or political, is an ill-defined concept in political science and public administration. Several authors have used it in relation to management, business and organizational science (Cohen *et al.*, 1969; Uzzi, 1997; Welch and Wilkinson, 2004; Moran, 2005). Knill (1998) has developed the concept in relation to the issue of administrative traditions and national capacities for public administration reforms, as a means of explaining variation in the implementation of EU legislation. More recently, Chardas (2012) has used the concept to explain some of the problems that the Greek authorities have faced in implementing EU Cohesion Policy, linking the concept with socio-economic environments.

In order to assess the usefulness of this concept empirically, this section presents qualitative evidence on how domestic institutional and political environments affect the daily work of EU funds administrators in Bulgaria and Romania. These are two of the countries that have had numerous problems in the management of the funding, but that have also drifted apart in terms of performance. In the two sub-sections that follow, the empirical analysis concentrates principally on Managing Authorities as the primary stakeholders involved in the implementation of Operational Programmes (OPs). Several examples are presented in relation to what is referred to in the literature as administrative capacity-building and processes (Boeckhout *et al.*, 2002; Milio, 2007; Bachtler *et al.*, 2013; Petzold *et al.*, 2015). The two sub-sections provide concrete illustrations of how both administrative and political embeddedness is manifested and how it affects the work of the Bulgarian and Romanian authorities in charge of EU funds management.

Administrative embeddedness

Administrative embeddedness is widely defined here as the dependency of Managing and Control Institutions, from a bureaucratic and procedural point of view, on their institutional hosts. Often, Managing Authorities (MAs) have relied on the bureaucratic and procedural support of the ministries in which they resided. Several problems emerged concerning the interaction of the two sides, which ultimately led to deficiencies in administrative capacity-building and generally for the process of EU funds management.

First, given that MAs acted as independent departments within the state administration led to animosities between different types of civil servants. Giving a special status to administrators in charge of EU funding was seen as a way to strengthen their capacity. However, in some cases this also alienated the wider administration and generated a "state-within-a-state" phenomenon:

Because we operated under different rules, we operated within the ministry as a state within a state. Acting like that alienated us from the administration, and it took a lot of effort. It could be done. I've done it. But it took a lot of effort. This is a process that depends on people.

(Former Director of Bulgarian Managing Authority #2)

The above clearly illustrates the inter-dependence between the two categories of civil servants. On the one hand, several hundred administrators created an elite type of public administration body, with a higher degree of expertise and incentives. On the other, regular civil servants had to assist the former in their daily activities, particularly on legal, procedural and human resources matters. However, because MAs were part of the wider administration, they often had to wait for support. In some ministries, EU funds administrators did not receive any "priority treatment" as compared to other departments, which could have slowed down the absorption process (Director of Romanian Managing Authority #3; Director of Bulgarian Managing Authority #1).

Another example of dependency on the host institution, and with concrete implications for the development of administrative capacity, was that in some Romanian ministries the wider ministerial apparatus was responsible for the use of technical assistance funding. One Director of a Romanian Managing Authority (#2) expressed how poorly the management of this funding was understood:

With regard to new resources, we manage the technical assistance axis equivalent to €10 million. This was another difficult aspect given that it was difficult to explain at the beginning of the programming period that these funds need to be spent. The MA is not a credit co-ordinator. It is a department in a big ministry with many other departments and which has one or several credit co-ordinators. It was difficult that they [the Ministry] needed to co-finance [technical assistance projects] with 25 per cent [from the overall budget of the project] in order for the MA to develop, on the one hand to train its personnel, and on the other hand to provide the technical conditions and to use certain work techniques, to go and train and inform beneficiaries

through all sorts of events. The Commission only came in 2011 and decided to co-finance [these type of projects] with 85 per cent [of the overall budget].

Second, administrative embeddedness presumed a legal dependency on the institutional host. The fact that MAs were based in a national ministry meant that they did not have judicial status and could only be represented in various judicial processes by a minister. On the one hand, this was often useful because the ministry could engage and assume responsibility in various legal proceedings on behalf of the MA. On the other, as mentioned by a Former Director of a Bulgarian Managing Authority (#2): "It was never understood that the MAs need certain operational independence and legal independence. They considered that yes, they will be directorates and the minister will do everything and decide everything". The technical and operational legitimacy of MAs may have been damaged as a consequence of their lack of judicial status.

Third, the general discrepancies in terms of salaries between staff from Managing and Control Institutions and staff from domestic host structures provoked internal rows and processes of contestation from the latter, who often had to provide crucial support to EU funds administrators in various stages of the absorption process. The fact that state experts working on EU funds were paid much more highly than most other civil servants triggered tensions, as related by an official involved in the process:

There was always a tension. For example, if you work in a structure like the Central Co-ordination Unit (CCU) and you want some help from the legal department of the ministry, there is always a chance for some experts to say: "You have a double salary, deal with it yourself". The trouble is that two years ago this measure was removed from the Government because of this tension. Because we are in the European Union you have to apply the same approach to the whole administration.

(Head of Unit in the Bulgarian Central Co-ordination Unit #1)

Furthermore, as emphasized by one local Bulgarian Mayor (#1), another problem was the lack of alignment between salaries, standards and work-related conditions of the indirectly involved stakeholders: "The problem is that the salaries in the Bulgarian administration are not in accordance with the quality and efficiency and motivation that the European projects require". Furthermore, for a long period of time, there were significant discrepancies between and within similar structures managing OPs. This reflected the configuration and internal arrangements of the host institutions for each and every MA or Intermediate Body (IB). For instance, within the Romanian Human Resources Operational Programme, until 2014, there were problems with disparities between salaries of staff in the different IBs. The Ministry of Labour had its own territorially spread IBs, at the NUTS2 level, covering the priority axes related mainly to employment and training. The Ministry of Education had one central IB that

managed the education priority axis. Although situated in Bucharest, it operated at the regional level through staff working in affiliation with Education Inspectorates. As emphasized by someone working in these institutions, the differences in salaries and workloads, within the same Operational Programme, were very high:

Hierarchically we addressed [reported to] Bucharest and the Intermediate Body there. As in [to] us. The IB addressed or had to address [report to] the Ministry of Education. The Ministry of Labour could not do anything to us. We were the Ministry of Education and they were the Ministry of Labour. This was one of the problems. This is how [the system] was thought. We did not receive any financial bonuses, they received financial bonuses. Then they could reach 50 million LEI [approx. €1,200] or in some months even 60–70 million LEI [approx. €1,300–1,400] and we had the same money 17–18 million LEI [approx. €400]. For so many years it went on like this, apart from the fact that the workload was totally different [the quantity of work was higher for the latter].

(Head of Romanian North-East Intermediate Body)

Overall, a general lack of financial incentives caused many other problems during the implementation stage of the projects. Quite often, domestic internal restrictions and salary caps affected the motivation among personnel and increased staff turnover. In the context of political instability and institutional turmoil, as well as in light of the effects of the austerity measures adopted by the governments of Emil Boc (2008-12), many administrators from Romanian MAs were tempted by the prospect of working in consultancies for salaries two or three times higher (Director of Romanian Managing Authority #2). The austerity measures entailed cuts of 25 per cent in the wages of all public-sector employees. Given that they applied equally to administrators managing EU funding, they were widely seen as 'contextual blockages' with important negative consequences for staff morale (Director in Romanian Audit Authority #1; Romanian MA Programme Evaluations Officer #3; Former Romanian EU Affairs Minister). Restrictions on hiring new staff was also a systemic problem, found in both countries, that affected all OPs, predominantly those in which the level of technical expertise required was high (for example, Environment and Transport) (Romanian MA Programme Evaluations Officer #1).

Overall, the fact that these institutions were administratively embedded in the national structures increased their vulnerability. However, added to this, political embeddedness also proved a negative factor for many of the staff involved in the absorption process.

Political embeddedness

Administrative embeddedness was manifested mainly at the legal/bureaucratic level and had a concrete operational dimension attached to it. Political embeddedness

entails a stronger political component. Very often, internal political dynamics and interests could affect the work of the Managing and Control Institutions.

First, being judicially dependent often made it difficult for MAs to react quickly to various developments. As pointed out by a Romanian Expert (#2), this was particularly the case when administrators required a validation at the political level:

The fact is that MAs were part of the ministries because they lack a judicial status. In general, to engage a ministry as a judicial actor is much more difficult. Although most communications were between MAs, if strategic issues arose, they could even reach the minister.

This enforced a dependency on politicians and limited the room for manoeuvre of administrators, as emphasized by a Former Director of a Bulgarian Managing Authority (#2):

By the way, an important perspective, one other fact that regards MAs as structures of the administration is the fact that being a director I am not of a public body under Bulgarian law. I had a status of a director as a civil servant relationship. But still, as a public body, judicially in relation with other bodies outside the ministry, I don't have entity [judicial status]. The entity [judicial status] is carried by the minister and the deputy minister, they are the [judicial] entities under Bulgarian [law and] administration. It creates problems because I cannot do a lot of my job without the minister.

One key argument for an enhanced political dependency was that these Managing and Control Institutions need to be politically accountable. Nevertheless, interviewees signalled that due to this, and the administrative tradition affiliated to it, many of the institutions involved in the process did not take the initiative and often waited for political leadership and guidance (Bulgarian Expert #2; Romanian Expert #1). This increased the importance of decisions taken by political representatives such as ministers, deputy ministers (Bulgaria) or secretaries of state (Romania). As a consequence, internal politics has played an equally important role in the management of the funds. One of the interesting examples given was that counsellors or political aides of ministers often acted as 'veto players'. They had the role of intermediaries between EU funds administrators and the minister. They also had the ability to convince politicians of the utility of different courses of action. However, if counsellors followed their own agenda or different political interests, then they could influence the opinion of the minister in a negative manner (Director of Romanian Managing Authority #2).

Despite all this, some have argued that over the years, relations between politicians and administrators improved, especially at the local level, where politicians often saw the political opportunities associated with EU funds developments:

We have cooperated well and we discovered that it can be done. You can have a good relation with different politicians, of different colours and

different types. In 15 years a lot of them changed. Some were more difficult than others and we cooperated well with them given the same reasons and because we did our job well and because they couldn't intervene. They don't have the necessary levers to intervene and do what they want. Here there are some rules they need to respect. We did our job and we protected them as well.

(Director in Romanian North-East Development Agency)

Yet, Romanian Regional Development Agencies tended to be institutional exceptions. Given their non-governmental and contractual status, they were separate from the overall institutional system, which allowed them to employ staff on a meritocratic basis, adopt a private-sector-oriented approach and improve their internal processes. Their success was widely recognized by both national and European officials. Such administrators could notice differences between the operation of their organization operated and that of those institutions embedded in the wider public administration.

Another key issue highlighted was that the lack of assumed responsibility went hand in hand with bureaucratization and unnecessary paperwork (Director in Romanian North-East Development Agency). Not only was there a dependency on procedural aspects but also on the official signing and validation of these documents. As stressed by an administrator, this caused significant delays in the process: "The following scenario is illogical: when the credit co-ordinators [elected officials] determine delays because they are gone for three weeks. Everything is blocked and no one can sign for them. This leads to delays" (Former Director of Romanian Intermediate Body #1).

Furthermore, there were also significant differences between ministries concerning the level of involvement of political actors. Several interviewees argued that some ministries provided a better working environment than others:

Yes, the Ministry of Regional Development has the investment logic and the necessary structures. You are not asked. You don't have to defend an Additional Act [amendment to a signed contract]. You make a payment and you send it to the credit officer. In the Ministry of the Interior, there were secretaries of state who required explanations for the payments we made. If there were ineligible payments, we had to argue why. Issues that didn't make sense and that took a lot of time.

(Director of Romanian Managing Authority #2)

Given the wider context and governance-related conditions in which these institutions had to operate, issues of administrative and political embeddedness affected their strategic abilities to carry out their work. Often, the strategic capacity of the public administration as a whole was poor or subject to political interference. For instance, in Romania the lack of a governmental commitment, as well as a general decrease in administrative capacity after 2007, affected the ability of the public administration to think strategically (EC Head of Sector #1; Former Romanian EU Affairs Minister). All of these examples show that the wider administrative and political context in which these institutions were situated was often key for their operational functioning.

It must be mentioned at this point that administrative and political embeddedness not only characterized Managing and Control Institutions but also public beneficiaries, in particular the structures managing EU funds at the municipality level which, in Bulgaria and Romania, are generally part of the local or regional public administration apparatus. Many municipalities had to rely on the decisions taken by mayors or municipal councils (Bulgarian EU Funds Co-ordinator for South-West Region #1; Bulgarian Municipality EU Funds Director #2). In addition, projects had to develop in line with the development strategies of the municipalities (Bulgarian Mayor #1; Romanian Expert #1). All of this added considerable pressure and increased the complexity of the management process.

Conclusions and recommendations

Drawing on evidence from the management and implementation of Cohesion Policy in Bulgaria and Romania, this chapter has argued that in order to comprehend what affects administrative capacity-building processes and performance, we must examine more thoroughly the administrative and political environments in which institutions responsible for EU funds management are embedded. Administrative and political embeddedness entails not only the settings and characteristics of local institutional environments and processes but also a general dependency of institutions managing EU funding on their host environment from several points of view (for example, financial and human resources, judicial support, technical expertise, political support). Consequently, embeddedness can affect the room for manoeuvre of Managing and Control Institutions and their inner workings and performance.

There was reasonable qualitative evidence, corroborated by various other official documents (Bulgarian Council of Ministers, 2013; Government of Romania, 2014) and independent evaluations (KPMG Romania *et al.*, 2010), to suggest that host institutional environments can often have a detrimental effect on the functioning of Managing and Control Institutions. In this respect, the very fact that administrators were dependent on the resources or willingness of domestic administrations and political representatives or did not receive sufficient support for everyday activities is a strong indication of the phenomenon of embeddedness. However, the above scenarios are by no means representative of all Managing and Control Institutions in the EU28 countries. They provide a glimpse of the internal workings and inter-dependencies of the institutional ecosystems analysed. It may be that many of these patterns of cooperation between, on the one hand, EU funds administrators and regular civil servants, and on the other, between EU funds administrators and national political actors may be found in other cases as well.

Overall, the fact that in some cases Managing and Control Institutions were dependent on the political leadership of their host institution may broadly reflect

the political and organizational culture of those institutions. On paper, the MAs had the necessary independence, yet in practice, given administrative and political embeddedness, their functions were often limited. Capacity-building processes need to be tackled not only within MAs but also in relation to the host administrative and institutional environments in which the MAs are situated. In other words, addressing the needs of the institutional ecosystems that host Managing and Control Institutions can potentially improve their functioning. In this respect, several measures can mitigate the role of the domestic institutional hosts and improve capacity and performance-related processes.

First and foremost, the importance of the domestic institutional environments must be acknowledged in both theoretical and practical terms. Keeping the two separate or disregarding the roles and differences in domestic institutional environments diminishes the ability of scholars and practitioners to understand the complexity of EU funds management processes. As argued, the inconsistencies and inefficiencies of the general environment in which MAs operated often hindered the development of an adequate capacity and led to poor performance. In this respect, measures that seek to build capacity should target not only Managing and Control Institutions but also domestic institutional environments (for example, central ministries that host or act as MAs). Generally, it has been up to the Administrative Capacity OP in both Bulgaria and Romania to seek to improve the quality of domestic public administration. However, more co-ordinated measures are needed, as are synergies between the Administrative Capacity and Technical Assistance OPs, in order to address administrative capacity for the administration as a whole. For instance, financial incentives may also be provided to staff who are tangentially involved in the management of EU funding. This may be done through an enhanced use of technical assistance funding (for example, the development of training curricula for EU funds and normal administrators), irrespective of national political judgements on the utility of such funding. Overall, a more targeted and uniform use of technical assistance could help to ensure more adequate capacity for OP implementation and help to boost administrative capacity-building processes.

Second, to counteract political influence and embeddedness, several courses of action may be needed. In this respect, better defined arrangements within Managing and Control Institutions may help to clarify the role and prerogatives of administrators and politicians. For instance, political agreements or memorandums may be useful in order to ensure administrative stability and safeguard senior and middle management staff from negative interference or practices of political clientelism. Another solution may be to enhance the legal protection of personnel working in MAs and IBs, balancing provision regarding their political and administrative accountability. Overall, one of the key principles behind these actions would be to restrict the prerogatives of political representatives to only those dimensions of the absorption process that entail a political contribution. Empowering administrators with regard to all procedural aspects in ministries hosting MAs and IBs may be another avenue worth pursuing. Decreasing the administrative dependence of administrators on the signing

and approval of documents may be a concrete example that can be introduced in future EU regulations.

Finally, more measures are needed to tackle an increased politicization of the use of EU funds. In recent years, many political representatives have sought to use EU funds to their advantage. Political clienteles have generated many bottlenecks in the selection and implementation of projects in Bulgaria and Romania, especially in the area of public procurement, which has often triggered funding suspensions and financial corrections from Brussels (Surubaru, 2014). To counter this, the independence of project selection must be reinforced and EU funds administrators need to track, prevent and eliminate potential conflicts of interest. Support for beneficiaries, transparency at all stages of the process, more protection for whistle-blowers and accessible open data for researchers could also help to achieve this.

Notes

- 1 This chapter is based on a paper presented at the 2nd EU Cohesion Policy Conference, Riga, Latvia, 4–6 February 2015. The author is grateful for a research grant provided by the Ratiu Family Charitable Foundation in support of data collection.
- 2 'Managing and Control Institutions' will henceforth refer to all of the main institutions that are part of the management and control systems of EU funding: Managing Authorities, Intermediate Bodies, the Certifying and Payment Authority, the Audit Authority and other public institutions involved in the EU funds management and control process.

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List of selected interviews

Bulgarian Expert #2, 19 May 2014

Bulgarian EU Funds Co-ordinator for South-West Region #1, 26 May 2014

Bulgarian Mayor #1, 5 June 2014

Bulgarian Municipality EU Funds Director #1, 4 June 2014

Director of Bulgarian Managing Authority #1, 30 April 2014

Director in Romanian Audit Authority #1, 14 April 2014

Director of Romanian Managing Authority #2, 7 March 2014

Director of Romanian Managing Authority #3, 14 April 2014

Director in Romanian North-East Regional Development Agency, 17 April 2014

European Commission (EC) Head of Sector #1, 16 October 2013

Former Director of Bulgarian Managing Authority #2, 16 May 2014

Former Director of Romanian Intermediate Body #1, 19 March 2014

Former Romanian Minister of EU Affairs, 27 March 2014

Head of Romanian North-East Intermediate Body #1, 17 April 2014

Head of Unit of Bulgarian Managing Authority #1, 7 May 2014

Romanian Expert #1, 18 March 2014

Romanian Expert #2, 11 April 2014

Romanian MA Programme Evaluations Officer #1, 12 March 2014

Romanian MA Programme Evaluations Officer #3, 11 April 2014