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POSITION STATEMENT
ON
THE DRAFT RECOVERY AND RESILIENCE PLAN OF THE REPUBLIC OF
BULGARIA

Integro Association held a special seminar for discussing the draft Recovery and Resilience Plan (RRP) with a wide range of representatives of Roma communities, Community Active Groups, municipal officials and local authorities who participate in the ROMACT Program of the EC and the Council of Europe.

The opinions of the participants in the seminar are summarized in the following points:

1. The presented document is not developed as a strategic plan with a detailed analysis of needs, difficulties and opportunities. It doesn't include detailed targets, indicators, deadlines and it lacks concrete interventions for implementation; there is no information on how these activities will help achieve the formulated main goal for overcoming the negative socio-economic consequences of the Covid -19 pandemic. This comment applies, to a great extent, to the actions in the field of social inclusion.

2. In general, the plan does not mention territories with a higher concentration of vulnerable ethnic communities and marginalized groups. Representatives of these groups and communities are not targeted in any of the planned interventions and, therefore, the RRP will not contribute to solving their problems and needs, although there is solid evidence proving Roma as one of the most affected groups in the Covid-19 pandemic. During the state of emergency, many Roma

fell into a humanitarian crisis because they lost all opportunities to earn their living. People in these groups are not subject to social assistance and do not have permanent employment, their income is often from work in unregulated activities such as collecting scraps, collecting herbs and mushrooms; seasonal work in agriculture or tourism; work on private construction sites and in private homes without an employment contract, etc. The pandemic crisis has drastically limited their access to these opportunities, putting their physical survival at risk.

3. Improper allocation of the planned resources in relation to energy efficiency activities will be allowed: the plan for activities targeting energy efficiency focuses on groups and communities with good social and economic opportunities. In the same time, it neglects energy-poor families and households, which have a very large share of the population in small settlements and rural areas.

People from vulnerable ethnic communities are not only part of the group of energy-poor households, but often they don't even have access to electricity, running water and sewage. Gas or central heating are not even to be mentioned. In order to provide heating during the winter, these people rely on burning wood in the best case, while often they use for heating all kinds of waste, which greatly pollutes the atmosphere and contributes to the increase of fine dust particles. Despite of this fact, these vulnerable groups are not targeted in any programs and projects for energy efficiency and decarbonisation.

4. The presented plan, as a whole, is not related to the direct consequences of Covid 19. It does not provide clarity on how it would contribute for solving the problems that would arise in case of a continuation of the Covid-19 pandemic. There is not clarity on WHO and HOW could benefit from these funds. The opportunities for various stakeholders to access these funds are not clearly defined.

5. The possibility for developing a social economy is strongly underestimated in the RRP of the Republic of Bulgaria. The resources allocated to support starting new social enterprises or developing the existing ones are small and disproportionate to the needs for this type of economy, especially in smaller settlements, where social services and business investments are severely limited and opportunities for permanent, quality employment are negligible. In such settlements, social enterprises could create sustainable employment for discouraged, long-term

unemployed people, including Roma women and young people who are among those, positioned furthest from the labor market. Roma young people make up a significant proportion of young people who are not in employment, education or training (NEETs).

The seminar makes the following recommendations for the draft RRP of Bulgaria:

1. The Plan needs to be developed in a more detailed way, setting specific goals and activities to achieve concrete results. It is, also, necessary to make a more detailed justification of the defined objectives and measures, as well as to develop a system of clear and measurable indicators that allow accurate reporting of the results achieved and the **impacts** of the measures taken. The Plan must, in particular, identify potential beneficiaries and users of resources under the various programs and projects.
2. The scope of individuals and families in disadvantaged position must include vulnerable ethnic groups, which are very much affected by the Covid-19 crisis, while in the same time they are excluded from the measures taken to mitigate the effects of the crisis. It is necessary to plan specific measures to address the problems of these groups, especially in small settlements, because so far they are not included either in the developed Operational Programs or in the current Recovery and Resilience Plan (RRP).
3. When planning energy efficiency measures, it is necessary to focus primarily on the state of the buildings of energy-poor families, and only for them public funding should be 100% of the grant. At the same time, activities and resources should be provided for these families to switch to more environment friendly heating sources.
4. Expand the scope and the allocated resources for the social economy by planning a separate financial line for starting and developing social enterprises to create sustainable employment for the long-term unemployed Roma community members, for Roma women and youth. They should be involved especially in environmental and nature protection spheres and this type of activities will contribute to the objectives of the Green Deal. This will not only create sustainable employment for these groups, but will also improve their social inclusion and

participation in the economic life of the country. The plan should envisage eligibility of municipalities and non-governmental organizations representing the most vulnerable Roma communities for the establishment of social economy enterprises.

5. The Plan should provide a special line for financing the construction of a water supply system in neighborhoods where families with children and elderly people have been living for decades without access to clean drinking water. This **should not be related to** the requirement for the number of population units, because it is a basic human right, and also, access to clean drinking water is one of the goals for sustainable development.

November 29, 2020