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**Summary of the Ex-ante Evaluation of Version 5 of the  
CZ National Strategic Reference Framework 2007-13  
Final Report No. III for Project 2/05-1  
November 2006**

Developed by Berman Group  
For the Ministry for Regional Development

# **SUMMARY THE EX-ANTE EVALUATION**

**Version 5 (modified)  
CZ National Strategic Reference Framework  
for 2007 to 2013  
of 7 November 2006**

**Project Final Report No. III**

**2/05-1 Ex-ante evaluation of programme documents for  
programming period 2007-2013 -  
updated NDP and NSRF**



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## Summary of the Ex-ante Evaluation of the CZ NSRF for 2007-13.

The fifth draft of the NSRF (version 5 of 7 November 2006) is a well balanced and logically structured document that includes all relevant issues important from the perspective of the Czech Republic as well as in terms of the links to other documents, in particular CSG, Economic Growth Strategy and National Lisbon Programme (NPR) for 2005-2008.

### 1. The NSRF Development Process and its Ex-ante Evaluation.

The preparation for the NSRF evaluation process started in parallel with the development of the programme document in the first quarter of 2005. The evaluator, Berman Group, služby ekonomického rozvoje s.r.o., headed by RNDr. Jan Vozáb, PhD, was chosen by open tender. The ex-ante evaluation formally started on the date of the contract signature by the evaluator, that was on 10 August 2005, however, the position papers and inputs related to the NSRF were already made available to the ex-ante evaluator in June 2005.

The evaluation is arranged as a process that runs in parallel with the NSRF development. That means that the ex-ante evaluators can immediately react to the completed parts and subsections of the NSRF, they can discuss these outputs with the NSRF developers and co-ordinator, they can be involved in the work of the MCC working groups and participate in the MCC meetings and provide on-going consultation both to the NSRF developers and co-ordinator (that is the Ministry for Regional Development, CSF Department) and „moderate technical assistance“. This is the reason why the evaluator not only delivers the Evaluation Reports but also delivers inputs (mainly in the form of analyses, reports and drafts) that provide the guidelines for the National Strategic Reference Framework development

The ex-ante evaluation focused on several key aspects of the NSRF:

- Most effort was concentrated on the issues of methodology and design of the NSRF
- The evaluators paid attention to the contents of each NSRF chapter
- The evaluation also dealt with the formal and administrative requirements for the NSRF

The evaluators believe that, at present, there are still the following main problems in the NSRF:

- There is still a mismatch and confusion between the NSRF and OP indicators;
- The regional dimension of interventions in the Thematic Operational Programmes that is required and expected in the NSRF is not adequately reflected in the TOP;
- There is no clear mechanism for the co-ordination of interventions between different Operational Programmes in order to achieve synergy of the OP interventions and this also relates to the fact that the NSRF does not respond to the unfinished (or inadequately developed) OP Implementation Systems.

The evaluators would like to point out that, in addition to the shortcomings resulting from the wording of the NSRF and/or OP, there are many other shortcomings and lacking conditions that do not have to

be directly seen in the text of the programme documents, but they are significant for the future implementation programmes such as (listed regardless of their significance):

- Inadequately developed co-ordination structures and mechanisms to ensure synergy between the SF and national programmes
- Inappropriate choice of tools for the implementation of interventions on the level of „implementation documents“ – too many grant schemes in the pipeline that can significantly reduce the Czech absorption capacity
- Weak or unavailable vehicles for implementation, so called delivery chains, particularly in the case of ESF Programmes, OP R&D, IOP, and uncertainty around ROP; either these delivery chains are not being built or it is assumed that the structures and implementation procedures, already now inadequate, will be maintained

## **2. Evaluation of the Consultation Process during the NDP and NSRF Development.**

From the view of the ex-ante evaluation the MCC and working groups are an adequate representation of different interests of stakeholders in the economic and social cohesion policy. In NDP/NSRF negotiations these bodies played their consultation role very well. Through these bodies all the important stakeholders were represented in the important decision-making. The consultation, negotiation and review processes of NDP/NSRF and OP were extensive and thorough for the entire period of the document's development. The engagement of the relevant social partners can be deemed adequate.

The consultations contributed to the better understanding of the content of NSRF interventions and their incorporation into the priorities and relevant OPs, thus making it possible to meet one of the important objectives of the ex-ante evaluation (and issues in the NSRF and OP development).

On the other hand the consultations can be seen as counter-productive in terms of better aiming of the programme documents and better specification of the intervention areas. The consultation process, in spite of all the effort, petrified the wide and very general specification of the programme document contents and their actions/operations.

The consultation process for the NSRF development did not help to identify any synergies and necessary functional links between the OPs and these remain to be insufficiently defined. Similarly, the effort failed to design mechanisms for common or co-ordinated delivery of the interventions the integration of which is necessary and desirable.

The shortcomings and difficulties that became obvious in the process of consultations among the partners point to the widespread problems that will turn out to be even more serious during implementation of the programmes and they can make some types of interventions extremely difficult or they can significantly limit the impact of some intervention results.

### 3. Evaluation of the Socio-economic and Regional Development Analyses.

The chapter „Socio-economic Analysis“ has been significantly redrafted when translating the NDP into the NSRF. The previous recommendations from the ex-ante evaluation have been largely reflected in the NSRF, nevertheless, some shortcomings still exist even in the currently evaluated version 5 of the NSRF. The biggest weakness of the Socio-economic Analysis and Regional Development chapters is the inconsistent and incoherent introduction of the main problems in the Czech Republic, which lacks a more detailed explanation of their root causes. This was the reason for the ex-ante evaluators' recommendation to modify both these chapters with a particular focus on the following:

- Emphasise the relevance in light of the Lisbon Strategy,
- Present the problems identified as linked with each other,
- Rank these problems by their significance,
- Sufficiently clarify their causes,
- Provide a consistent description of each topic and apply a uniform and well-defined structure.

There are only minor changes, primarily in wording, in the chapter on socio-economic issues in the most recent NSRF version (November 2006). The main recommendations of the evaluators to the May version of this chapter in the NSRF (see above) have not been adequately reflected and implemented. Although the socio-economic analysis in the existing wording serves as the basis for the strategic part of the NSRF, it is necessary to point out the absence of ranking the problems by their significance. Adequate identification of these problems and explanation of their causes is also missing. In many points the socio-economic analysis only duplicates the SWOT analysis.

In addition to the recommendations above, the NSRF ex-ante evaluation of June 2006 also contained 4.5 pages of very specific comments, recommendations and suggestions related to the text of each section of the socio-economic and regional development analyses. These recommendations have not been reflected. The annexes to the NSRF do not include any reference table comparing the CZ competitiveness factors with other countries as suggested by the ex-ante evaluator.

The fact that the tables and diagrams are not incorporated in the main body of the document but they are in separate annexes is acceptable; the references to them are in most cases correct and adequate and the tables and diagrams relate to the facts analysed and stated.

The description of the current status covers all important and necessary issues resulting from the analytical work carried out by the ex-ante evaluators, both for the purpose of the NSRF evaluation (see the draft „Analytical Background for the NSRF Evaluation“) and the inputs for the NDP development in 2005. Nevertheless the individual sections of the analytical chapters are not very well balanced. In light of all the reservations it can be stated that the text parts of the analytical chapters can serve as a sufficient basis for the development of other sections of the NSRF.

### 4. Evaluation of the SWOT Analysis.

The SWOT analysis, with respect to the complexity and comprehensiveness of the NSRF, is acceptable and can be used as a basis for the subsequent NSRF strategy. The current SWOT

analysis is the combination of the proposals of the controlling body and the alternative opinions of the evaluators. For the final version of the NSRF, the evaluators recommended shortening the SWOT analysis and ranking the SWOT findings by significance and this was fully reflected.

The evaluators recommended the modification of SWOT in a way that the internal analysis (SW) would deal with the issues that can be directly influenced by the SF interventions and the external analysis (OT) would deal with the issues outside the economic and social cohesion political framework. This recommendation was not reflected. Many findings of the external analysis (OT) relate to the area where there is a direct impact of the SF interventions and they are structured in a way that „doing/promoting something“ is an opportunity and „not doing/promoting“ is a threat. The evaluators consider such an approach to the external analysis as a lack of understanding of the methodology, meaning and purpose of this exercise. However, this failure has no direct consequences in the NSRF strategy.

## **5. Evaluation of the previous SF interventions.**

In their previous evaluation, the evaluators strongly recommended to finalise the chapter „Evaluation of the previous SF interventions“ so that it would include the conclusions of all previous evaluation studies focused on the SF spending and highlighting the reasons for limited achievements of the Czech Republic in this area. This recommendation has not been reflected apart from adding a paragraph mentioning the need to increase the administrative capacity and the need for reform of the public administration. The evaluators are of the opinion that this newly added paragraph is not enough.

The evaluators deem the findings and conclusions of the chapter „Evaluation of the History of Implementation of Structural Funds Programmes“ in version 5 of the NSRF to be unreasonably overoptimistic, in particular, the data stated in the table showing the prerequisites for meeting specific objectives.

The most serious issue the evaluators can see is the fact, that the weaknesses in the implementation system, as well as in the external environment for the delivery of SF interventions, are not addressed in preparation for the 2007-2013 programming period. The system for programme implementation and the delivery of the relevant interventions (the approach to the support of individual projects and the delivery mechanism) remain almost unchanged for the next period and, at the moment, no significant changes in them are envisaged. This can pose a serious threat to the intervention deliveries in the forthcoming period, particularly if these interventions will be different in nature compared with the existing ones or if they are to be delivered by new bodies.

## **6. Evaluation of the NSRF Strategies and Priorities.**

The previous recommendations made by the ex-ante evaluators in June 2006 were mainly aimed at the wording and explaining the NSRF strategy and at the formal structure and sequence of the strategy sections and priorities. In general these recommendations have been reflected and the chapter on the strategy underwent a significant change between May and November. The content of the NSRF strategy remains very close to the original version of May and that is viewed by the evaluators as correct. The focus and structure of the strategy and priorities are deemed to be relevant

in terms of the needs and problems in the Czech Republic in the area of economic and social cohesion.

In spite of the fact that the evaluators have no significant reservations on the content, focus and objectives of the NSRF strategy, they had, and they still have, many comments on its individual sections.

**Global Objective:** as for the content it is, in principle, well defined and it is obvious that it is supported by the strategic objectives. However, the ex-ante evaluators have been pointing out since December 2005 that the definition of the Global Objective is too lengthy and it tries to encompass all possible development aspects in a single statement. This is the reason why it is incomprehensible.

The evaluators suggest redrafting of the Global Objective definition in the following way:

The Global Objective of the NSRF is to enhance the attractiveness of the Czech Republic for investment, create excellent conditions for employment and offer people more opportunities for further development using the unprecedented economic growth in compliance with the principles of sustainable development.

**Strategic Objectives** for the *Competitive Economy and the Attractive Environment* are well defined and provided with adequate and measurable indicators. The Strategic Objectives for *Open, Flexible and Cohesive Society* and the *Balanced Territorial Development* are too complex and defined as multiple objectives.

We recommend making the definition of the objectives more consistent and similar to those in the Competitive Czech Economy, both in terms of better wording and graphical layout.

The explanation of the Strategic Objectives – the descriptive part – has been redrafted as recommended by the ex-ante evaluators; the text is now shorter, simpler and focused on the links between the strategic objectives and it highlights how the strategic objectives will contribute (jointly) to the achievement of the Global Objective.

Although this chapter has been significantly improved in version 5 of the NSRF against version 4, the evaluators recommend considering rewording in order to improve the explanation of how the proposed interventions link with the expected outcomes and how they contribute to meeting the intervention objectives.

**Strategic Objective: *Balanced Territorial Development*** – is an extremely important goal for the implementation of the NSRF strategy, as it strives to meet its objective to maintain and increase territorial cohesion. As it also focuses on the urban areas development it is an important element of the NSRF to meet the objectives of CSG.

The priorities of the *Balanced Territorial Development* are well identified and their content is now in line with the requirements resulting from other sections of the NSRF strategy as well as the needs of the entire Czech Republic.

However, the evaluators are not convinced that the requirements of this strategic objective are adequately and correctly reflected in the Thematic Operational Programmes even though in the text there is a description of the OPs' general contribution to this objective.

### **Focus of the NSRF in the Context of CSG and NRP.**

In general it can be stated that the NSRF priorities are well linked to the CSG and NRP priorities and that they represent a good basis for meeting the goals and objectives of CSG and NRP wherever it is desirable and possible. On the other hand, it cannot be stated without any doubts that the NSRF priorities will directly lead to the attainment of the CSG and NRP objectives, as this depends on many other factors and tools related to the relevant interventions and these can only be specified in the Operational Programmes and their implementing documents.

### **Evaluation of the NSRF and OP Indicators.**

The system of indicators proposed in the NSRF version of May was for the first time well integrated. The ex-ante evaluators significantly contributed to its design. Their suggestions have been largely accepted by the NSRF developers.

The recommendations of the ex-ante evaluators of June 2006 have been reflected only in some cases. Those recommendations that were (deliberately) in conflict with the proposed CORE and Lisbon indicators were rejected. The set of indicators measuring the results in the area of Research and Development has been significantly improved.

One indicator, which the evaluators required to be added to the Strategic Objective, has not been incorporated. This was the indicator showing the relative number of people in an age cohort starting tertiary education, which is viewed as a key indicator for the Education priority. The evaluators insist on adding this indicator. The impact indicator at the level of the Global Objective that measures the relative number of people who attained tertiary education in the cohort of 15 (?!) to 64 years old is not viewed by the evaluators as appropriate.

In the Strategic Objective for the Attractive Environment, the indicators monitoring the outcomes and impacts of the interventions in transport infrastructure were to be added. The indicator monitoring the performance of railway transport and the indicator monitoring the availability of integrated public transport at the local level have been incorporated.

However, the indicator considered by the evaluators as the most important one has not been added. This indicator relates to the significant funds aimed at transport infrastructure and monitors the accessibility of regional capitals via the motorway network. The evaluators strongly recommend adding this indicator or replacing it with a similar one that monitors the specific transport infrastructure projects to be implemented (motorways and class I roads). For example a dual carriage road between Hradec Králové and Olomouc, and Ostrava and the state border towards Žilina etc.

A detailed analysis of links – both material and quantitative – between the NSRF and OP indicators showed that the entire system of indicators is not sufficiently integrated and there are serious shortcomings in this respect. This will cause tremendous difficulties in aggregating and projecting the results of the OP interventions to the NSRF level that has proved to be difficult already in the current programming period.

## 7. Evaluation of the Impacts of the NSRF Interventions.

The impacts of the NSRF interventions are monitored by means of macroeconomic modelling using the HERMIN model. This modelling is driven by the requirement of the European Commission guidelines for NSRF evaluation and it is the subject matter of a separate project.

However, the ex-ante evaluators are of the opinion that the impacts of each intervention should also be measured at the qualitative level that goes beyond the macroeconomic modelling. As the NSRF is implemented through OPs, the measurement can be carried out using the evaluation of the Operational Programmes or, at least, with respect to the Operational Programmes priorities and their content. For more details and explanation see the full text of the ex-ante evaluation; this Summary includes only the most important findings.

### ***NSRF Strategic Objective: Competitive Czech Economy.***

The impacts of the interventions falling under this objective will happen with some significant time delay; therefore the main concern is that the outcomes and results will not deliver the expected scope of impacts at the NSRF level due to the identified hurdles.

### ***Strategic Objective: Open, Flexible and Cohesive Society.***

Interventions falling under the OP HR and Employment priorities will lead to successful delivery of the NSRF priority, provided that the hurdles, primarily of institutional and legal nature, are removed. **Therefore these priorities are not feasible as such** in spite of the comments on the quality of training and re-training programmes. **However, the evaluators strongly believe that the existing Czech welfare system can in fact interfere with the aim of the Employment Policy Action.** This can be documented by the worsening structure of the unemployed that is not only due to the lack of jobs and skilled labour among the unemployed. The chance to achieve the targets in this area is significantly limited by the nature of the welfare system.

The general issue with the ESF Programmes that is not addressed by the OPs is the fact that ESF Programmes are focused on specific problems and they cover only some multifaceted aspects (for example nursery care for family members so that the carer could increase his/her qualification and enter the labour market) or cover only a limited scope. They do not take on board an integrated approach to the supply side and demand side but only address some of their aspects and even these aspects are not fully grasped by them. On top of that, these programmes are not linked to the relevant actions in the reform of public administration that could indirectly lead to changes in legislation to stimulate and activate the work force.

### ***Strategic Objective: Attractive Environment.***

**The ex-ante evaluators have doubts about the feasibility of the transport infrastructure projects in the scope outlined in Priority 2 of the OP Transport. Either the outcome indicators are overestimated by many times, that is the total length of newly built motorways and dual carriageway roads or the costs of these projects are seriously underestimated. The ex-ante**

**evaluators are convinced that the impact of the interventions proposed will not be delivered by the OP Transport support and this puts the objectives of the NSRF Priority – Improved Accessibility through Transport Infrastructure - under threat.**

Similarly in Priority 4 of the OP Transport (Enhancement of Class I Roads outside TEN-T) and in priorities of ROP (Class II and III Roads and Local Roads) for South West, North West, North East and Moravia-Silesia the expected length of the newly built or enhanced roads is overestimated if current costs of similar projects in the Czech Republic are compared with the financial allocations under the relevant priorities. Even in these cases, meeting the objectives of these priorities and subsequently the NSRF priority is very uncertain.

***Strategic Objective: Balanced Territorial Development.***

**The IOP still contains numerous intervention areas that are not well integrated. Nonetheless, the IOP contains some subsections that are well designed and where a significant impact can be expected in terms of meeting specific NSRF priorities. Particularly Priority 1 Public Administration Enhancement and the support targeted to the revitalisation of pre-cast slab housing developments can significantly contribute to the implementation of the NSRF. The interventions aimed at the social services infrastructure are necessary within the NSRF, however, their impacts will become visible only if closely integrated with other programmes focused on the utilisation of the infrastructure.**

**Interventions proposed in the ROP's priorities for Regional Transport Infrastructure** will deliver the outcomes that will contribute to meeting the ROP's relevant specific objectives. The proposed interventions will put technical prerequisites in place to reduce the adverse environmental impacts of transport, however, these prerequisites will assist to meet this rather complex and intertwined objective only if the public transport becomes more attractive and there will be more integrated transport systems, for which no prerequisites have been put in place in the Czech Republic at the moment.

**In the case of Tourism**, the importance of incoming foreign visitors is overemphasised. The evaluators are of the opinion that the potential of domestic tourism is not fully appreciated in all ROPs. So called soft interventions in tourism are proposed in a very general way. As there is a lack of integration it can be expected that the impact of the interventions in this area will be highly limited.

In case of **Integrated Territorial Development**, it can be stated that, although a delay in the implementation of the Integrated Development Plan is expected, it will be possible to design a system of interventions that will only support large projects with an integrated approach to the territory or subject matter. There is nothing what would technically prevent this approach as the ROP includes all actions needed for the implementation of the Integrated Development Plans in the area of urban regeneration and urban social infrastructure development.

However, the main challenge here is the readiness and willingness of the stakeholders, including local governments and municipalities, to implement these actions in a truly integrated manner either from the aspect of the territory or subject matter. **So far it has appeared that the municipalities and their representatives are going to develop the Integrated Development Plans as a series of loosely linked interventions that later will be integrated through an explanatory strategy or in a better**

**case, presented as a project under the earlier developed and relatively broadly conceived urban development strategies.**

## **8. Operational Programmes: the Implementing Instrument for the NSRF.**

The Operational Programmes have evolved significantly from June to November 2006. The chapter in the NSRF dealing with the Operational Programmes is well drafted, clear and includes information required at this level.

From August to November many overlaps in the Operational Programmes have been removed, the interventions to be implemented under the ROPs received better funding and the Integrated Operational Programme has been redesigned.

**The number of Operational Programmes, the allocation of interventions to these programmes and their link with the NSRF priorities are acceptable, in the ex-ante evaluator's view, and in principle they comply with the requirements and recommendations stated in the previous ex-ante evaluations with the two following exceptions:**

- The priorities of the NSRF strategic objective Balanced Territorial Development must be supported by the specifications of regional and urban interventions in the Thematic Operational Programmes as it has been recommended several times in the ex-ante evaluations and this has not been done so far.
- The Integrated Operational Programme, in spite of significant improvements and a more concentrated focus, is still only loosely linked to the NSRF priorities and only some of its interventions contribute to their objectives.

The strategic reasoning for all Operational Programmes (with the exception of the Integrated Operational Programme) relies on the logics of the content and requirements of the NSRF priorities and it also takes into account the administration system and delegation of power (competences) both at the national level (ministries) and regional/local level.

There is a certain problem that the areas of interventions/priority and their description/operation proposed by the OP are mainly conceived as „enablers“ in spite of the positive changes made in the last versions of OPs and better foreseen situation than it is in the current programming period. The definition of the intervention areas specifies where the SF moneys can be (in theory) spent but it does not speak about the specific interventions/operations to be implemented and supported in practice.

In line with the General Regulations for SF all OPs are designed as a single fund programme. The single fund approach to the programmes, their wide focus and in some cases links to the interventions (e.g. OP R&D and OP Education, OP Environment and ROP) will require very close co-operation between the programmes.

**This is a challenging situation in terms of co-operation and co-ordination of the programme implementing bodies. The evaluators are of the opinion that in the case of operational programmes the necessary conditions have not been created for this kind of co-operation.**

The ex-ante evaluators believe that it would be useful to add some requirements for the co-ordination of the OP interventions in the description of some OPs (e.g. OP R&D and OP EDUCATION). However, not all the links have been captured. The evaluators are of the opinion that the requirements driven by the NSRF are not adequately developed and do not provide a required level of details in the relevant OPs which poses a risk that they will not be taken into consideration while implementing the OPs.

## 9. Evaluation of the Community Horizontal Policies in the NSRF.

The ex-ante evaluators recommended adding a new chapter into the NSRF that would address the issue of horizontal themes. This chapter has been included and its focus is adequate for the purpose of the NSRF.

In addition to this chapter on horizontal policies in the NSRF strategy, this issue should also be reflected in relevant Operational Programmes.

## 10. Evaluation of Chapter: Management and Co-ordination of the Cohesion Policy in ČR in 2007-2013.

The final version of the NSRF of November 2006 includes a comprehensive outline of the institutional structure and mechanisms that are currently being developed for the management and co-ordination of the Cohesion Policy at the national level in the forthcoming programming period.

The deficiency of this chapter is that it concentrates too much on a detailed overview of powers and responsibilities of the bodies at the top level of the implementation, financial management and monitoring systems rather than emphasising the strategic and design principles that could help in dealing with the existing problems experienced in the implementation of the Economic and Social Cohesion Policy. In this version, unlike in the version of May 2006, the key elements have been better developed that directly respond to the existing problems and their inadequacy also received negative criticism in the previous evaluation – (i) change in the system of financial flows, (ii) human resources and capacities development or in other words the human resource policy in the area covered by the Economic and Social Cohesion Policy.

In the current wording of the NSRF the issue of administrative and absorption capacity in relation to the final beneficiaries is also addressed. However, some doubts are raised by the following statement: “The absorption capacity reaching the regional level *should be* ensured by creating a wide network of contact points, the role of which will be to communicate all operational programmes and types of support and assist the applicants in the region.” (Page 94). **The evaluators strongly believe that the contact points – as a purely technical measure – are in no case an adequate tool for addressing the absorption capacity problems in the Czech Republic.**

Nevertheless, the ex-ante evaluators are of the opinion that the wording of the chapter in spite of some minor deficiencies meets the requirements set out for this part of the NSRF.

## **11. The Evaluation of the Chapter: System of the SF and CF Financial Flows through the National Budget.**

The chapter „System of the SF and CF Financial Flows ....“ is very brief and outlines the changes aimed at very desirable acceleration of the financial flows to the final beneficiaries.

The understanding of the method of calculation of the national share of co-financing has improved as the calculation in the forthcoming programming period will not relate to the total eligible costs but only to the costs funded from the public funds. This approach eliminates a great deal of uncertainty in estimating the potential share of final beneficiaries in co-financing.

The statement at page 103 „The National Programmes will support only those areas that cannot be co-financed from the European funds“ will have far reaching consequences. This rule is generally welcome, however, in some cases it can be applied in an inappropriate manner.

A new chapter dealing with the ex-ante evaluation of additionality has been added to the final version of the NSRF. From the methodological point of view, the analysis is based on determining the relevant spending in the same structure as in the calculation of additionality for 2004 – 2006 period, excluding the support for agriculture and rural development that are not going to be covered by, Structural Funds interventions in 2007 – 2013 period. On the other hand, a new item - the spending to support housing - has been included.

We must point to the fact that there has been a sharp increase in additionality (by approx. 70%) against the current programming period, particularly due to the higher capital expenditures in the transport infrastructure, increase in the eligible projects funded at the regional level and the fact that the spending in housing was higher than in agriculture and rural development.

**The position of the ex-ante evaluators is that the chapters reviewed meet the requirements of the NSRF. However, we would like to point out the need to clarify the approach to the integration of National and European Programmes, in particular specify the way of ensuring their additionality whilst adhering to the additionality principle in each specific case.**