Contract N: 1532/03.07.2020

Executive Summary
Implementation Course - June 2021
2\textsuperscript{nd} Evaluation – Implementation of the Epirus Region OP 2014-2020

Conclusions and Recommendations of the Evaluation – Executive Summary
1. Summary OP Epirus 2014-2020


The Development Vision of the Region, which focused on the structure and structure of the OP "Epirus 2014-2020" is:

"To become sustainable, having out-ward looking development, focused on productive activities that are comparative advantages and reinforce the local identity, with respect to the environment, history and the citizen of Epirus".

In the context of achieving the above vision, special emphasis is given to the implementation of the Regional Strategy "Smart Specialization", with support focusing on the following areas of specialization:

- Primary sector - processing - agri-food - gastronomy
- Industry of experience: Tourism, Culture & Creative Economy
- Academic Institutions, ICT and Youth Entrepreneurship
- Health and Wellness.

The achievement of the vision of the OP "Epirus 2014-2020" is achieved through five (5) Strategic Objectives (SO):

- SS1: Enhancing regional competitiveness by developing innovation and ICT
- SS2: Environmental protection and sustainable development
- SS3: Strengthening of transport infrastructure
- SS4: Strengthening education, health and welfare infrastructures
- SS5: Human Resources Development, Social Inclusion and Anti-Discrimination

The resources allocated to the Programme based on the last revision, amounted to € 236.4 million Community Assistance (€ 295.5 million Public Expenditure), of which € 194.3 million CA from the ERDF (€ 242.9 million Public Expenditure (€ 52.6 € Public Expenditure).

In order to serve the central objective – vision of the Region, the Operational Programme was structured into 7 Priority Axis (PA), of which the first five PAs correspond to the five Strategic Objectives of the Programme and the last two PAs relate to the Technical Assistance ESF and ERDF of the Programme. In particular, the PAs of the OP "Epirus 2014-2020", with reference to the thematic objectives to which everyone is associated, are:

- **Priority Axis 1: Enhancing regional competitiveness by developing innovation and ICT**
  - TO 1. Strengthening Research, Technological Development and Innovation
  - TO 2. Improving access to Information and Communication Technologies (ICT), their use and quality
  - TO 3. Improving the competitiveness of small and medium-sized enterprises

- **Priority Axis 2: Environmental protection and sustainable development**
  - TO 4. Supporting the transition to a low-carbon economy in all sectors
  - TO 5. Promoting adaptation to climate change and risk prevention
2. Evaluation of the implementation course and effectiveness of the O.P. Epirus 2014-2020

Progress of implementation of the programme

The progress of the implementation of the Epirus Region OP is important both in terms of the implementation of the projects and for the implementation of the development policy and the objectives of the programme and also gives results to the significant development problems facing the region as a whole, as well as the productive stakeholders, workers and the unemployed.

Going through the eighth year of implementation of the OP, the progress of its implementation based on the financial data until 07.05.2021, can be summarized as follows:

- 91 actions have been specified with a total budget of € 411.91 million
- 103 Calls for a total public expenditure of € 454.52 million have been issued
- 5,378 projects with a total eligible public expenditure of € 478.4 million have been integrated.
- Legal Commitments amount to € 293.6 million
- Certified Expenditures amount to € 132.4 million

Overall, until 07.05.2021 the programme showed a high degree of activation and integrations (153,8% and 139,4% respectively), a relatively satisfactory degree of legal commitments (99,4%) but low degree of absorption (44.8% of programme resources).
In total, until 07.05.2021, the Programme had integrated:

- **224 public procurement projects** (non-state aid projects), of which **37 projects have been completed** (16.5% of the total), **137 are in progress and it is estimated that they will be completed** by the end of 2023 (61.2% of the total), **31 projects are ongoing projects** related to the operation of social structures whose funding from 01.01.2022 will be transferred to the programming period 2021-2027 (13.8% of the total), while **19 have been designated as transferable projects** for the new programming period

- **5,154 state aid projects**, of which **102 projects of total budget 943.8 k€ have already been completed**, while the rest are estimated to be completed on time by the end of 2023.

The above data, with analysis in the 7 Priority Axes (PA) of the programme, are presented below:

**Under Priority Axis 1, "Enhancing regional competitiveness through the development of innovation and ICT"**, are being implemented actions aimed at strengthening regional competitiveness (with a focus on SMEs), through the development of innovation and ICT. The PA has a budget of **€ 43.76 million** and represents almost **14.8%** of the total budget of the OP.

4,986 projects have been integrated in PA1 (of which 3,992 relate to the new action for the support of small and very small Enterprises affected by the Covid-19 pandemic).

PA1 shows the highest degrees of activation, integration and legal commitment (228.7%, 210.7% and 206.1% respectively) which essentially reflect the activation of the new action of COVID-19, but the projects have not yet been implemented in order to absorb expenditures, leaving the degree of absorption of the programme resources at very low levels (13.2%).

Within the framework of **Priority Axis 2, "Environmental protection and sustainable development"**, actions aimed at environmental protection and sustainable development are implemented. The axis has a budget of **€ 105.2 million** and represents almost **35.6%** of the total budget of the OP. It shows a high degree of activation and integration (82 projects with a total eligible public expenditure of € 187.4 million have been integrated, which corresponds to 178.1% of its budget), a relatively satisfactory degree of legal Commitments (74.4%) and a moderate degree of absorption of programme resources (47.8%). A significant acceleration was observed in the integration of projects in the year 2020, which gave a small impetus to the legal commitments, but without a corresponding continuation in the first four months of the current year.

Within the framework of **Priority Axis 3, "Strengthening of transport infrastructure"**, are implemented actions aimed at enhancing transport infrastructure. The axis has a budget of € 55.1 million and represents 18.7% of the total budget of the OP. It shows a high degree of activation (177.5%) and integrations 141.4%), but a moderate degree of legal commitments (51.9%).

Within the framework of **Priority Axis 4, "Strengthening education, health and welfare infrastructure"**, have been integrated 24 education, health, and welfare and vocational education infrastructure support projects. The axis has a budget of **€ 33.59 million** and represents **11.4%** of the total budget of the OP. It shows over-commitment to integrated projects (120.9%), high degree of legal commitments (95.9%) and high rate of absorption of its programme resources (83.9%).

**Under Priority Axis 5, "Human Resources Development, Social Inclusion and the Fight against Discrimination"**, are being implemented 264 projects aimed at enhancing employment and worker mobility and social inclusion and combating discrimination. The axis has a budget of **€ 51.8 million** and represents **17.5%** of the total budget of the
Final Summary

OP. It shows over-commitment to integrations (141.3%) and legal commitments (116.8%) and a relatively high degree of absorption of programme resources (59.1%).

Under Priority Axis 6, "ESF Technical Assistance", are implemented actions that aim to implement the ESF actions under Priority Axis 5 and are included actions in order to strengthen the systems and the procedures of the Managing Authority, the supporting structures of the system as well as the Beneficiaries and the other stakeholders in order to effectively implement the ESF actions of the Operational Programme. The axis has a budget of € 786.27 thousand and represents only 0.27% of the total budget of the OP. It shows full activation and integration, but very low degree of legal commitments (12%) and absorption of programme resources (6%).

The Priority Axis 7, "ERDF Technical Assistance", concerns the Technical Assistance of the Programme for the implementation of ERDF actions implemented under Priority Axes 1 to 4 and includes actions to strengthen the systems and procedures of the Managing Authority, the support structures of the management system, as well as the Beneficiaries and other stakeholders in order to effectively implement the ERDF actions of the Operational Programme. The axis has a budget of € 5.2 million and represents only 1.8% of the total budget of the OP. Displays full activation and integrations. It also shows a relatively high degree of legal commitments (70.8%) and absorption of programme resources (58.1%).

Effectiveness of the programme

The effectiveness of the program, amounted to 0.3331, (marking an increase of about 7% compared to the performance recorded in the first edition of the evaluation of 31.07.2020 (- 0.3116). The level of the Index is estimated as low for the implementation period of the Programme approximately 2.5 years before the end of the current programming period). This is mainly due to the low efficiency of PA 2 (0.2977), which has the highest financial weight in the budget of the integrated projects (39.2%), as well as the low efficiency of PA1 (0, 2875) and the even lower efficiency of PA3 (0.1127), which bind 19.3% and 16.3% respectively of the budget of the projects integrated in the programme. However, PA 5 contributes positively to the effectiveness of the OP, which shows an efficiency index of 0.4830 and at the same time has a significant financial weight in the programme (15.3%), while the high value of its efficiency index does not significantly affect the overall effectiveness of the PA 4 (0.73), due to its low financial weight (8.5%).

In more detail, per PA:

- PA 1 presents an efficiency index of 0.2875, which is mainly due to the progress of the physical implementation of the projects under the TO 3 (efficiency index 0.3455). TO 3 has a high financial weight on the axis (73.26 %).

- The Efficiency Index of PA 2 amounts to 0.2977 and is mainly due to the relatively high percentage of physical implementation of the interventions of TO 6 (0.4170), which binds 61.12% of the budget of integrated projects of the axis.

- The progress of the implementation of the projects of PA 3 is particularly low (efficiency index 0.1127), with 48.1% of the budget of the integrated projects not having yet been contracted.

- PA 4 presents the highest efficiency index (0.7303), which is mainly due to the significant progress of the implementation of the interventions of TO 9 (0.7744), which constitute 59.07% of the total budget of the
included projects on the Axis. Respectively, the interventions of TO 10 show a satisfactory progress of implementation (efficiency index 0.6666).

- **PA 5** presents the 2nd highest efficiency index in the Programme (0.4830), due almost exclusively to the progress of the implementation of the interventions of TO 9 funded by the ESF (efficiency index 0.5129).

- **PA 6 and 7** concerning Technical Assistance, have limited financial weight, as the relatively high efficiency of the second (0.5119) and the low efficiency of the first (0.1070) do not significantly affect the overall course of the Program.

The main conclusions from the analysis of the effectiveness of the Program are as follows:

**PA 1: Enhancing regional competitiveness through the development of innovation and ICT**

The implementation course of PA1 highlights the problem of "delayed" activation and implementation of Research, Technological Development and Innovation actions (TO 1), actions to improve access and use of ICT (TO 2), as well as actions for the improvement of competitiveness of small and medium-sized enterprises (TO 3).

The relative acceleration observed in the processes of integration and contracting of projects during the years 2018 - 2019, has not had a significant effect in the absorption rate of PA 1, while the new additions in 2021 in the context of strengthening the companies of the Epirus Region affected from the Covid-19 pandemic, are expected to contribute directly to the absorption of available axis program resources.

The progress of PA 1 interventions has been influenced by many factors including:

- the difficulties presented in the mandatory use of the State Aid Information System, which significantly affected the progress of the implementation of state aid actions of TO 1, 2 & 3
- the activation of the interventions of TO 1 & 2 was significantly delayed due to the relevant conditionalities and self-commitment.
- the activation of interventions of TO 2 were further burdened by the implementation of the new evaluation process and their approval by the General Secretariat for Digital Policy.
- the legal difficulties encountered in the process of selecting an Intermediary Body
- the introduction of the new regulatory framework for Financial Instruments for the period 2014-2020 and the actions required to update their ex-ante evaluations, which delayed their implementation.
PA 2: Environmental protection and sustainable development.

The high rate of progress of the integrations is not accompanied by a similar development in the rate of contracting and absorption of the OP’s budget. The main inhibitors of the smooth implementation of the projects of PA2 were the following:

- The progress of the implementation some of the interventions of Thematic Objective 4 was significantly affected by the delay in the fulfillment of conditionality 4.1 (introduction of measures to ensure the minimum requirements for the energy efficiency of buildings), which was covered by the publication of the Common Ministerial Decision for the approval of “energy performance of buildings” (“KENAK”) regulation in June 2017. Also, the launch of the “Exoikonomo” Program II required many time-consuming preparatory actions, such as the redesign of the selection / inclusion criteria of the households, the updating of the required supporting documents in the framework of the new, the required modification of the information system of the Energy Performance Certificates, due to the new KENAK, as well as the development of a unified information system for submitting applications. The above resulted in the submission of applications to the Program to begin in March 2018.

- The progress of the implementation of the interventions of TO 6 was significantly affected by the requirement of fulfillment of Conditions 6.1 for the water sector (existence of a) pricing policy for water and b) adequate contribution of the various uses of water in recovering the cost of water services, at the rate specified in the approved river basin management plan for investments supported by the projects) & 6.2 for the waste sector (promotion of economically and environmentally sustainable investments in the waste sector, in particular through the preparation of waste management plans in accordance with Directive 2008/98 / EC and on the basis of waste prioritization).

- An additional inhibiting factor was the reform of the Institutional Framework of Public Procurement - Law 4412/2016 (and the required time of adaptation of the Beneficiaries to it), as well as the delay in the start of operation of the Register of Members of Tender Committees - (Feb 2018), which influenced the auction of projects with the system "Design - Construction".

- Also, the required maturation time of the Integrated Territorial Investment Interventions (ITII) should be noted as an inhibiting factor. The implementation of spatial development tools is governed by complex requirements and procedures and requires sufficient maturation time to implement the relevant strategies. The enhanced role of the civil authorities is a positive element, however, time is needed for the consultation of the citizens, in order on the one hand to ensure the role of the civil authority and on the other hand to achieve the optimal and smooth implementation of the interventions.

- Finally, the delay observed over time in the implementation of the interventions of PA2 (contracts, costs) is due to the large percentages of discounts (50%-60%) during the bidding procedures.

PA 3: Strengthening transport infrastructure

Key factors that influenced the smooth implementation of the Axis interventions in the transport sector are:

- The lack of maturity of the projects for the calls for proposals
- The time-consuming expropriation procedures, which are necessary preparatory actions for the bidding of the projects.
- The reform of the Institutional Framework of Public Procurement - Law 4412/2016: the changes brought by the Law in the procedures of the tenders, the delay in the issuance of the necessary interpretative circulars and decisions for the implementation of the tender procedure, as well as its EADISY models for the submission of tender documents, significantly delayed the tender procedures of the projects.
PA 4: Strengthening education, health and welfare infrastructures

The progress of the implementation of the interventions of the axis is particularly satisfactory and is mainly due to the significant progress of the implementation of the interventions of TO 9, which constitute 59% of the total budget of the integrated projects. Respectively, the interventions of TS 10, which concern the development of education and vocational training infrastructures (IP 10a), present satisfactory progress of implementation.

The IP 9b "Providing support for the physical, economic and social revitalization of deprived communities within urban and rural areas" has not yet been activated, as it is expected the resolution of the property status by the Special Secretariat for Roma Social Inclusion.

PA 5: Human Resources Development, Social Inclusion and Anti-Discrimination

PA 5 shows over-commitment to integrations and legal commitments and a relatively high rate of absorption of programme resources.

For the activation of actions for the entrepreneurship in the framework of the IPs 8i and 8v, the Development Planning Department of Epirus Region was appointed as an Intermediate Body. IP 8i was activated with the issuance of the call for business support for the employment of unemployed people with high formal qualifications (79/2019), in the framework of which have been integrated until 07.05.21 188 projects, with a total budget of public expenditure of EURO 5.04 million.

At the same time, the training activities of IP 9i and Local Development Initiative of Local Communities 9vi have been activated and the relevant calls have been issued, following the issuance of the general guidelines for the design and implementation of continuing vocational training programs for the unemployed in October 2018 by EAS.

IP 9v was activated with the issuance of a relevant call for the subsidy of Social and Solidarity Economy Actors/ Bodies by the MA, after the negative response of Intermediate Body of Business Program Competitiveness and Entrepreneurship and the Epirus Region’s Development Planning Department, but also the non-response of NSRF Staff Structure of the Ministry of Labor and Social Affairs, Sector of Employment and Social Economy, to a relevant question to be appointed as Intermediate Body.

PA 6 & 7: Technical Assistance (ESF and ERDF)

PA 6 shows full activation and integration, but a very low degree of legal commitment and absorption of program resources. The acceleration observed in the project integration processes in 2017 has not, so far, provided the required momentum in the implementation of PA 6.

PA 7 shows full activation and integration and a relatively high degree of contracting and absorption of program resources.

3. Results from the analysis of the Performance Framework

Based on the analysis of the Performance Framework by Priority Axis that took place in the evaluation, the following conclusions emerged:

- For Priority Axis 1, it is estimated that all the indicators of the Performance Framework will fully achieve or even exceed the target for 2023, as well as the financial indicator.
- For Priority Axis 2, it is estimated that all the indicators of the Performance Framework will be fully achieved or even will exceed the target for 2023. An exception is the CO19 indicator "Wastewater treatment: Additional population served by improved wastewater treatment", which is expected to achieve a target of
more than 85%, but not be fully achieved, as some of the integrated projects that contribute to the index are expected not to be completed within the current programming period.

- For **Priority Axis 3**, it is estimated that the output framework of the Performance Framework will achieve a target of more than 85%, but not full achievement, as one of the integrated operations contributing to the index is expected not to be completed within the current programming period. The F100 financial index of the axis is estimated to be achieved at a rate of around 61%.

- For **Priority Axis 4**, it is estimated that all the indicators of the Performance Framework will be fully achieved or even will exceed the target for 2023.

- For **Priority Axis 5**, it is estimated that all the indicators of the Performance Framework will be fully achieved or even will exceed the target for 2023.

In other words, it seems that all the Priority Axes will successfully achieve the objectives of the Performance Framework for 2023, except for **Priority Axis 3**, which will need to consider revising the target values of the indicators for in 2023.

4. Efficiency of the Program

In terms of **efficiency of the Programme**, i.e. based on the ratio of physical (efficiency) to financial implementation, **Epirus OP** shows a value slightly higher than one, **1.1666**, since the progress of implementation of the physical object of the integrated projects (efficiency index) is followed from slightly smaller, but corresponding absorption rate.

The highest efficiency is shown by the interventions implemented under **PA 1 (2.1235)**, as they have a lower absorption (13.54%) compared to the degree of their completion (28.75%), which should be interpreted as a result of the backlog of declaration of expenses in individual projects of the axis and not due to their economic implementation. It is pointed out that the above result of PA 1 is formed mainly by the action of strengthening the companies of the Region of Epirus affected by the pandemic Covid-19, which shows zero absorption, while the progress rate of implementation of the physical object was estimated at 35% (on 07.05.21), taking into account that the companies that have integrated projects are supported for the working capital of the year 2021.

Respectively, **PA 6 (1.7578)** shows a high efficiency index, given that the ESF Technical Assistance actions implemented under the PA, show lower absorption (6.09%) compared to their degree of physical integration (10.70%), as a result of the backlog of expenditure declarations in individual projects.

In the other Priority Axes, the progress of the implementation of the projects is followed by a corresponding progress of the financial absorption, with the result that the efficiency index is formed a little above one.

5. Conclusions from the analysis of logical intervention

The analysis of the internal logic of the **EPIRUS OP 2014-2020** takes into account the needs in the policy areas and the Strategic Objectives of the Programme, the Specific Objectives and the expected results of the interventions of the Investment Priorities, the actions corresponding to specific Investment Priorities, as well as the Result and Output Indicators selected for measuring / yielding the desired results.

The following conclusions emerge from the evaluation of the intervention logic of the Programme:

- The **strategy of the OP** is characterized by **satisfactory logic** and **programmatic continuity** from the upper to the lower level of targeting.
The formulated development needs reflect the critical issues that the Region is called to face, while where necessary, the needs that are foreseen to be covered by other Operational Programs of the current programming period are usually indicated.

The Strategic Objectives of the OP derive smoothly and are fully in line with the logic of the General Development Objective / Vision of the Epirus Region and in turn are equally specialized by the specific objectives that have been set at the PA level.

The Specific Objectives at the PA level are compatible with the Strategic Objectives and the expected results are in line with the identified needs and challenges of the political responsibility areas of the Programme.

The envisaged Action Categories as categorized in Investment Priorities are compatible with the Specific Objectives of the OP, while confirming through them the contribution of the Programme in addressing the needs and achieving the desired results.

The system of indicators of the Programme, after its successive modifications, consistently reflects the desired result of the interventions that have been designed and implemented during the implementation of the Programme.

Individual minor issues identified by the analysis made during the preparation of the evaluation study improve the overall intervention logic of the Programme and relate to the need:

1. Of adjustment to the wording of the needs that the Programme is called upon to address
2. Of adjustments to the options of individual Investment Priorities, which are no longer a priority for the Programme
3. Of adaptation of the Specific Objective 10.1.1, by adapting the vocabulary of the Specific Objective 10.1.1 to “Development of (modern) education and lifelong learning infrastructures”, a vocabulary that is consistent with the desired results
4. Of individual adaptations of the Programme’s indicator system, with the abolition of 2 output indicators and modification of 2 calls with the addition of an equal number of output indicators
5. Of adding "Covid" indicators to the business indicators of the programme.

6. Conclusions - Proposal for the revision of the OP Epirus 2014-2020

Based on the evaluation results regarding the degree of completion of the Regional OP at the end of the Programming Period 2014-2020 and taking into account the evaluation of the degree of risk of the individual projects (integrated and new) there is a need to revise the OP Epirus 2014-2020, arising from the following reasons:

the need to strengthen the enterprises of the Region to deal with the consequences of the COVID-19 pandemic,

ensuring the possibility of generating expenditures at the end of the Programme at a rate that will amount to 110% of the total public expenditure at the level of Fund / Priority Axis,

settlement of the over-commitments of the Programme in order to minimize the risk of significant burden of the non-co-financed part of the Public Resources Programme (need to reduce the risk of losing resources at the end of the Programme),

need for optimal utilization of the available resources of the Programme, by strengthening the Priority Axes that present or are expected to present higher rates of absorption, with resources from other PAs of the same Fund that present or are projected to present lower performance.

The main points of the proposed revision are the following:
A. Internal redistribution of resources within the Programme by modifying its financial tables

- Increase of the co-financed public expenditure of Priority Axis 1 by € 29,600,000 (+ 67.6%)
- Reduction of the co-financed public expenditure of Priority Axis 2 by € 2,500,000 (-2.4%)
- Reduction of the co-financed public expenditure of Priority Axis 3 by € 24,000,000 (-43.5%)
- Reduction of the co-financed public expenditure of Priority Axis 4 by € 2,100,000 (-6.3%)
- Small increase of the co-financed public expenditure of Priority Axis 5 by € 500,000 (+ 1.0%)
- Reduction of the co-financed expenditure of Priority Axis 6 (ESF Technical Assistance) by 500,000 (-63.6%) and Priority Axis 7 (ERDF Technical Assistance) by 1,000,000 (-19.2%).

B. Modification of the Output and Result Indicators of the RDP

- Minor corrections in the target values of various output and outcome indicators in selected investment priorities of the programme
- Deletions of output indicators and results from various investment priorities
- Adding "Covid" output and result ratios to selected investment priorities

Γ. Modification of the Performance Framework of the RDP

- Minor corrections of selected indicators of the Performance Framework and the F100 index in all Priority Axes (AP 1-5)

Δ. Analysis of the proposal for redistribution of resources

Based on the revision proposal, for the completion of the integrated projects of the Programme and those that are foreseen to be included within 2021, total ERDF resources of € 275 million (compared to the available € 242.93 million) are required, resulting in a burden on national resources in the amount of € 32 million (113.2%). Respectively, the ESF requires total resources of € 65.37 million (compared to the available € 52.6 million) resulting in a burden on national resources of € 12.8 million (124.3%). Thus, the total burden on national resources amounts to € 44.82 million and the over-commitment at the end of the Programme reaches 115.2%, taking into account the possibility of early "closure" of the social structures of the ESF (Community Centers, Day Care Center for the Elderly, Daily Care Center, Poverty Structures) and transfer of their funding from 01.01.2022, to the next Programming Period 2021-2027.

It is pointed out that the estimates of completion of the implemented and new projects result in discrepancies in relation to the existing financial planning for all Priority Axes and Thematic Objectives, which in most cases are greater than 110%, which is the percentage of over-commitment of secure closing of Programmes of the NSRF 2014-2020.

The proposed redistributions of resources between TOs are as follows:
While the degree of coverage of the thematic concentration requirements of the ERDF is presented in the table below:

<table>
<thead>
<tr>
<th>Programme Resources</th>
<th>THEMATIC CONCENTRATION OBLIGATIONS</th>
<th>Min 50% of ERDF resources in Thematic Objectives 1, 2, 3 and 4</th>
<th>Min 12% of resources in Thematic Objective 4</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total EC without TA</td>
<td>190.172.368,00</td>
<td>190.172.368,00</td>
<td></td>
</tr>
<tr>
<td>Regulation Requirement for Thematic Concentration</td>
<td>95.086.184,00</td>
<td>22.820.684,16</td>
<td></td>
</tr>
<tr>
<td>Thematic Concentration</td>
<td>55.208.204,80</td>
<td>20.197.031,20</td>
<td></td>
</tr>
<tr>
<td>%</td>
<td>29,03%</td>
<td>10,62%</td>
<td></td>
</tr>
<tr>
<td>BASED ON THE REVIEW PROPOSAL</td>
<td>Total EC without TA</td>
<td>190.172.368,00</td>
<td>190.172.368,00</td>
</tr>
<tr>
<td>Regulation Requirement for Thematic Concentration</td>
<td>95.086.184,00</td>
<td>22.820.684,16</td>
<td></td>
</tr>
<tr>
<td>Thematic Concentration</td>
<td>83.688.204,80</td>
<td>24.997.031,20</td>
<td></td>
</tr>
<tr>
<td>%</td>
<td>43,82%</td>
<td>13,09%</td>
<td></td>
</tr>
<tr>
<td>Difference</td>
<td>-11.797.979,20</td>
<td>2.080.347,04</td>
<td></td>
</tr>
</tbody>
</table>
It is pointed out that the thematic concentration requirements of the ERDF should be covered at national level, while at the same time the use of the derogation provided in paragraph 2 of Article 4 of Reg. 1301/2013 is allowed, according to which the minimum percentage of ERDF available for a category of regions may be less than what is required under the thematic concentration obligation, provided that this reduction is offset by an increase in the percentage available in other categories of regions.

Finally, the degree of coverage of the ESF thematic concentration obligations is listed in the following Table:

<table>
<thead>
<tr>
<th>Programme Resources</th>
<th>THEMATIC CONCENTRATION OBLIGATIONS</th>
<th>At least 20% of the ESF’s total resources should be allocated to the TO 9</th>
<th>Min 60% of ESF resources at Operational Programme level, up to five (5) ESF investment priorities</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Total EC without TA</td>
<td>42.062.715,20</td>
<td>42.062.715,20</td>
</tr>
<tr>
<td></td>
<td>Regulation Requirement for Thematic Concentration</td>
<td>8.412.543,04</td>
<td>25.237.629,12</td>
</tr>
<tr>
<td></td>
<td>Thematic Concentration</td>
<td>38.883.140,00</td>
<td>37.683.140,00*</td>
</tr>
<tr>
<td></td>
<td>%</td>
<td>92,44%</td>
<td>89,59%</td>
</tr>
<tr>
<td></td>
<td>Difference</td>
<td>30.470.596,96</td>
<td>12.445.510,88</td>
</tr>
<tr>
<td>BASED ON THE REVIEW PROPOSAL</td>
<td>Total EC</td>
<td>42.062.715,20</td>
<td>42.062.715,20</td>
</tr>
<tr>
<td></td>
<td>Regulation Requirement for Thematic Concentration</td>
<td>8.412.543,04</td>
<td>25.237.629,12</td>
</tr>
<tr>
<td></td>
<td>Thematic Concentration</td>
<td>36.083.140,00</td>
<td>34.803.140,00*</td>
</tr>
<tr>
<td></td>
<td>%</td>
<td>85,78%</td>
<td>82,74%</td>
</tr>
<tr>
<td></td>
<td>Difference</td>
<td>27.670.596,96</td>
<td>9.565.510,88</td>
</tr>
</tbody>
</table>

* IPs 9i, 9ii, 9iii, 9iv, 9v