

## IV. CORRUPTION IN THE BUSINESS SECTOR

In 2014, the Bulgarian public saw first-hand indicators of the **formidable scope and scale of political corruption** and its corrosive impact on the economy:

- The rise and fall of the Corporate Commercial Bank has demonstrated that **state capture** has firmly gripped even the most powerful law enforcement public institutions such as the public prosecution, the financial intelligence, as well as the central bank. Bulgarian public institutions have been paralysed for months, leaving small depositors stranded in a bank under special supervision, while two powerful moguls have been disputing ownership over the bank and its assets.
- The **South Stream saga** at the same time has revealed the depth of corruption reach in public institutions, as third country interests have been able to dictate terms on the Bulgarian parliament and the Bulgarian government at the expense of Bulgaria's financial and European interests. In the face of rising economic and political risks to the project government ministers have acted haphazardly to ensure ways for more than BGN 1 billion of public funds to be irreversibly committed to the project. This has happened against the backdrop of a continuing rise of indebtedness of state-owned energy companies, with National Electric Company debts towering over BGN 3.5 billion, while Bulgargas and gas dependent central heating companies have been constantly scrambling for cash to ensure adequate gas and heating supply.
- The lack of control over public spending in 2013 and 2014 coupled with long leadership vacuum at key revenue agencies and the de-facto blocking of anti-corruption law enforcement has resulted in the **rise of public procurement and administrative corruption**. Ultimately, Bulgaria has entered a spiral of rising debt, with the Ministry of Finance proposal from October 2014 for the total allowable debt ceiling for 2014 rising from 22% to 28% of GDP in a matter of six months. Total government debt stood at 14% of GDP at the end of 2009. Public expenditures have kept crawling up in 2014 according to plan, although revenues have continuously fallen short of expectations.

### The CCB Case

In the CCB affair public institutions have been pitched against one another at the expense of the general public interest, with the net public welfare loss likely to rise well above 5% of Bulgaria's GDP, or comparable to the EU funds the country was entitled to receive in the 2007 – 2013 period. The case has revealed the very high level of political and oligarchic control of the Bulgarian economy in key sectors such as fuel trading, telecommunications, media, etc.

State-capture symptoms, which have so far surfaced in the affair:

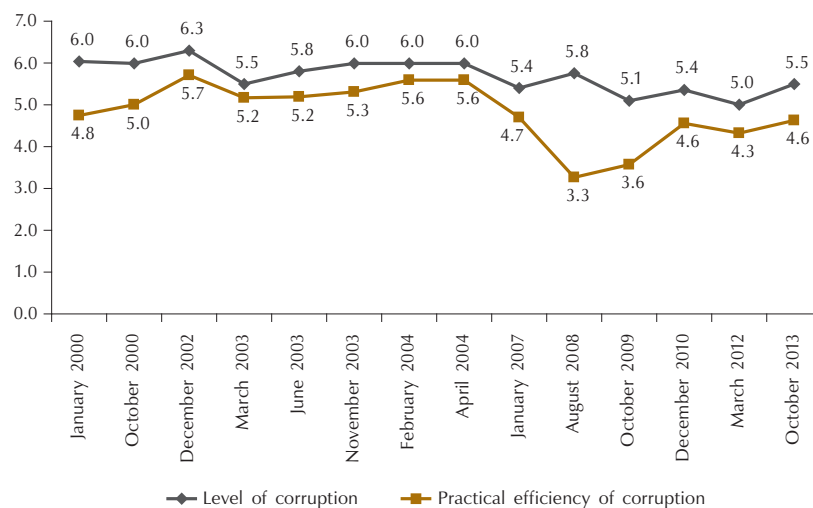
- The Bulgarian prosecution, MoI, and SANS have launched a coordinated highly publicized attack on companies close to the bank a week before its placement under special supervision in June 2014. The attack has coincided with media outbursts against the stability of the bank from one of the large media groups in the country, and with the start of criminal investigations against the deputy governor of the central bank in charge of banking supervision. It is unlikely that professionals from the law enforcement institutions would not consider very carefully the full effect of their actions on the stability of the bank and the banking system as a whole.
- The Bulgarian National Bank has appeared incapacitated and unwilling to act swiftly and with resolve to shore up the bank, and to stop the panic from spreading, preferring instead to continuously appeal to politicians for action. It has issued numerous conflicting statements over the health of the bank in a very short period of time, and has chosen to withhold important pieces of information from the bank's review following its placement under special supervision. The bank has been initially evaluated as well capitalised, liquid, and stable by the central bank, which has been confirmed by the CCB withstanding withdrawals of up to BGN 1 billion in the week before the bank's placement under special supervision. The subsequent revision of the bank's loan portfolio, requested but not disclosed publicly by the central bank, revealed a potential loss of asset value to the tune of BGN 4.5 billion. Claimed irregularities are so blatant that it is inconceivable for them not to have been noticed in advance by the central bank and law enforcement bodies.
- In a final accord the newly convened Bulgarian parliament decided to consider scenarios for saving CCB in an apparent act of rebuttal of central bank authority and trust.

## Administrative Corruption

Bribes have in effect become part of the price for certain administrative services. In the business sector, the practical efficiency of corruption as a means to resolve problems and obtain access to services remains high, and has even been on the rise since 2008. The indexes for corruption pressure and involvement in corruption practices measuring the level of corruption in the business sector have not changed significantly in recent years. There is no notable change in perceptions of the corruptness of the business environments, either, i.e. no principle change of the business environment has been achieved.

According to the Eurobarometer survey 2013 and the *EU Anti-Corruption Report*, corruption is most likely to be considered a problem when doing business by companies in the Czech Republic (71%), Portugal (68%), Greece and Slovakia (both 66%). In Bulgaria, 51% of the companies consider

**FIGURE 16. PERCEPTIONS OF CORRUPTNESS OF SOCIETY AND PRACTICAL EFFICIENCY OF CORRUPTION IN THE BUSINESS SECTOR IN BULGARIA (TREND)**

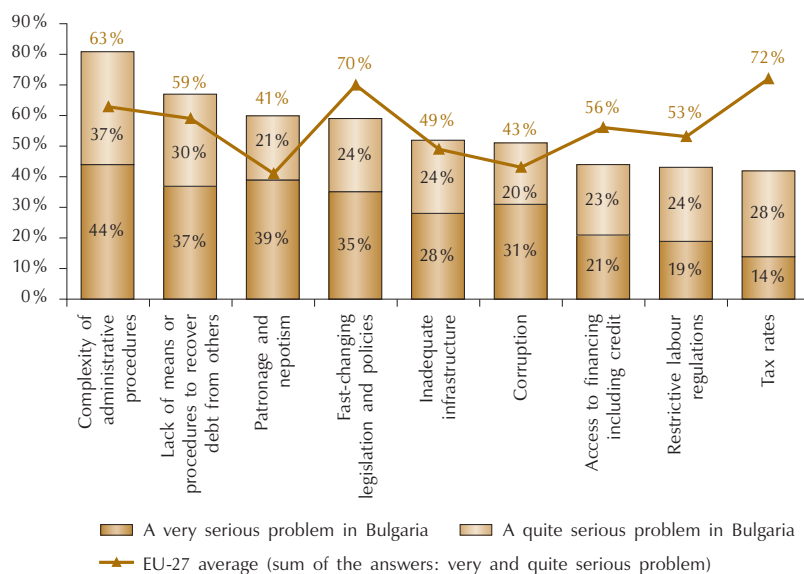


Source: CSD/SELDI Corruption Monitoring System.

corruption as a problem to their operation. This is slightly higher than the EU average. In addition, more than 60% of companies in Bulgaria consider patronage and nepotism to be quite serious and very serious problem to doing business in the country, as compared to only 40% on average in the EU. This is exacerbated by the higher complexity of administrative procedures companies face in Bulgaria compared to the EU.

In terms of types of corruption practices, Bulgarian companies are much more likely to encounter pecuniary forms of corruption than their EU counterparts, with bribes and kickbacks being the most widely spread corruption practices in the country. In Europe these are more likely to be replaced by favouritism of friends and family as well as different forms of fraud. Interestingly, buying political influence seems to be equally likely in Bulgaria and in the EU.

**FIGURE 17. PROBLEMS ENCOUNTERED IN DOING BUSINESS**



Source: Flash Eurobarometer – Business, EC, 2013.

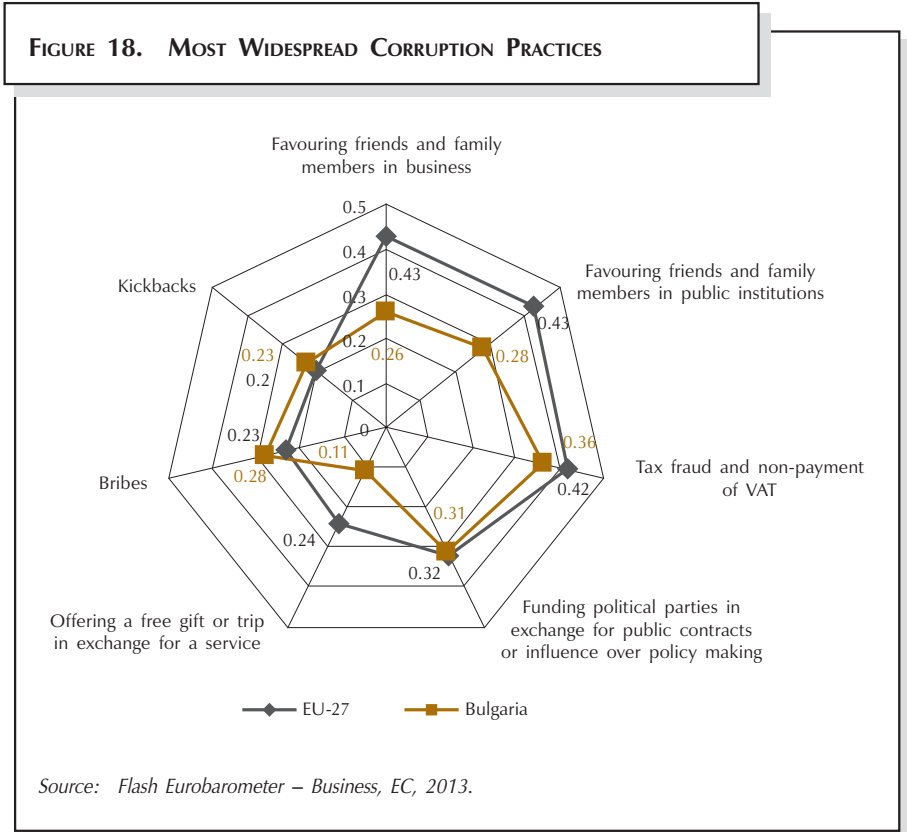
Several summary conclusions could be made regarding the impact of corruption on the business sector:

- Corruption is still an effective tool to resolve immediate business problems, e.g. dealing with competition pressure or avoiding a fine. Through corruption many businesses often make successful efforts to shield themselves from

the competition and/or obtain procurement contracts. In this respect countering corruption would be much more effective if economic, rather than criminal justice policies and measures are enforced, such as improvement in the anti-monopoly practice, ensuring higher transparency of key markets, etc.

- Companies lack confidence in the public institutions, and complain of lack of equal treatment by the legal system.

- E-Justice and e-government are far from operational despite the substantial amounts of public money spent on such projects. Most documents requested by the administration are considered official only if presented on paper. This puts additional administrative burden on the companies and citizens, slows down turnover, and generates corruption pressure.



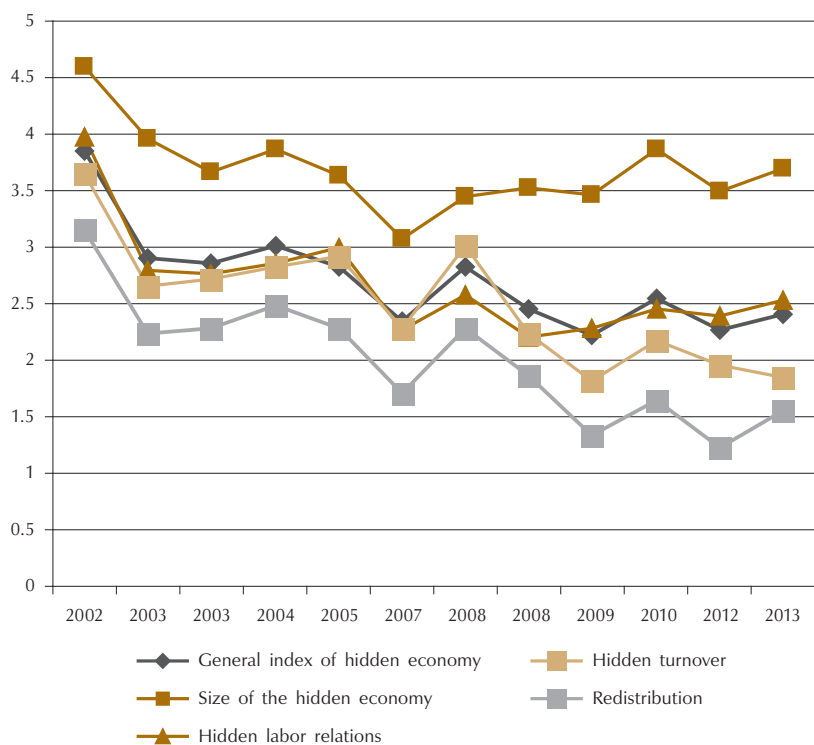
### Hidden Economy

According to various estimations, the hidden economy in Bulgaria is about 30% of GDP. The operation of businesses in the hidden economy is related, among others, to the use of bribes, mostly directed towards the public administration and the control bodies (social securities, tax, etc.). It should be noted that, as a positive trend over the last 10 years, the hidden economy has shrunk due to various economic factors, including the economic convergence with the EU, the deepening of the credit markets, the introduction of mandatory employment contract registration in 2003 and the real-time linking of fiscal devices with the National Revenue Agency (NRA) servers, as well as the performed follow-up checks.

Still, according to CSD's 2013 *Hidden Economy Index*, the share of the hidden economy in Bulgaria has increased slightly on an annual basis. This trend is likely to have persisted in 2014. The main reasons can be sought in the lack of improvement of the general economic sentiment and the continuing overall political instability, which has affected negatively the functioning of the control and compliance bodies. Estimates show that, according to rough approximations, almost BGN 1.45 bn annually is

lost to VAT evasion and social security contribution gaps, while the real figure could be even higher.<sup>57</sup>

FIGURE 19. HIDDEN ECONOMY INDEX 2002 – 2013



Source: *Hidden Economy Index*, Center for the Study of Democracy/Vitosha Research, 2013.

One of the key factors, which can influence positively or negatively the development of the hidden economy and the corruption related to it is the functioning of the numerous control and compliance bodies in the public administration. In the past two years political oversight on the functioning of these bodies has been lax, increasing the risks of corruption. The control functions of these bodies are considered one of the most potent risk factors in business. Some of the key agencies have remained without management for an extended period of time, which has affected negatively their performance, e.g. revenue collection. Although the level of transparency and performance appraisal of most such agencies has improved, they remain predominantly focused on controlling, rather than servicing businesses. At the same time,

it is unlikely that negative attitude towards control and compliance bodies is replaced by more cooperative behaviour while large-scale displays of graft such as the CCB case remain unresolved.

## Public Procurement and Corruption

Economic difficulties after 2008 increased the competition among companies for public contracts and gave an additional lever to both politicians and the administration to extract corruption fees. Despite economic difficulties, the total value and number of procurement contracts has increased continuously, indicating an increase in corruption opportunities (Table 2). On the positive side, the number of awarding entities and the number of contractors has been increasing, which denotes a rising and vibrant market and competition. While this has improved the value for money proposition in competitive markets, it has also made it more difficult for compliance and control authorities to check for irregularities.

In the area of public procurement, a complex and ever changing legislative framework has made it even more difficult to create a culture of objectivity

<sup>57</sup> CSD Policy Brief 42: *The Hidden Economy in Bulgaria in 2013*, Center for the Study of Democracy, November 2013.

and rigour. The e-procurement system has been gaining traction in Bulgaria, but still has limited functionalities. The increasing responsibilities of the specialised Public Procurement Agency have not been matched with similar increase in its human capacity and budget. Thus, the positive idea to task the agency with ex-ante checks of larger procurement procedures has been limited in scope due to capacity constraints. The checks cover neither the decisions of contracting authorities to apply derogations to the application of EU procurement legislation, nor the technical specifications of the tenders. More importantly, there are doubts about the effective enforcement of rules and the application of sanctions in the public procurement process, which are confirmed in highly publicised cases of wasteful spending in the case of large energy projects, the acquisition of vehicles for government agencies and ministries, etc.

**TABLE 2. PUBLIC PROCUREMENT CONTRACTORS, ANNOUNCEMENTS AND CONTRACTS IN BULGARIA**

	2010	2011	2012	2013
Number of awarding entities	2,585	3,217	4,662	5,302
Number of contractors	14,700	16,347	18,257	20,490
Total number of public procurement announcements	7,404	8,194	10,129	11,939
out of them: above the EU threshold	1,599	2,022	2,570	3,653
out of them: with EU funding	951	1,210	2,421	3,012
Public procurement announcements in construction	1,056	1,177	1,552	1,791
Public procurement announcements in supplies	3,463	4,025	4,679	5,162
Public procurement announcements in services	2,877	2,989	3,888	4,986
Number of contracts	15,755	17,579	20,813	22,779
Total value of the contracts, in billions of BGN	4.00	5.78	5.97	8.04

Source: Public Procurement Agency.

Note: The number of contracts and the total value in Table 2 may differ from other sources, as the Public Procurement Registry is continuously updated.

The Flash Eurobarometer 2013 survey among 2,816 European companies shows that 58% of the Bulgarian firms claim corruption has prevented them from winning public tender or public procurement contract in the last 3 years. Closest to that are data for Slovakia (57%), Cyprus (55%) and the Czech Republic (51%). At EU-27 level an average of 32% of the companies that have participated in public tenders/public procurement say corruption prevented them from winning a contract. A total of 58% of the Bulgarian and 57% of the EU-27 firms consider that public procurements are tailor-made for specific companies.

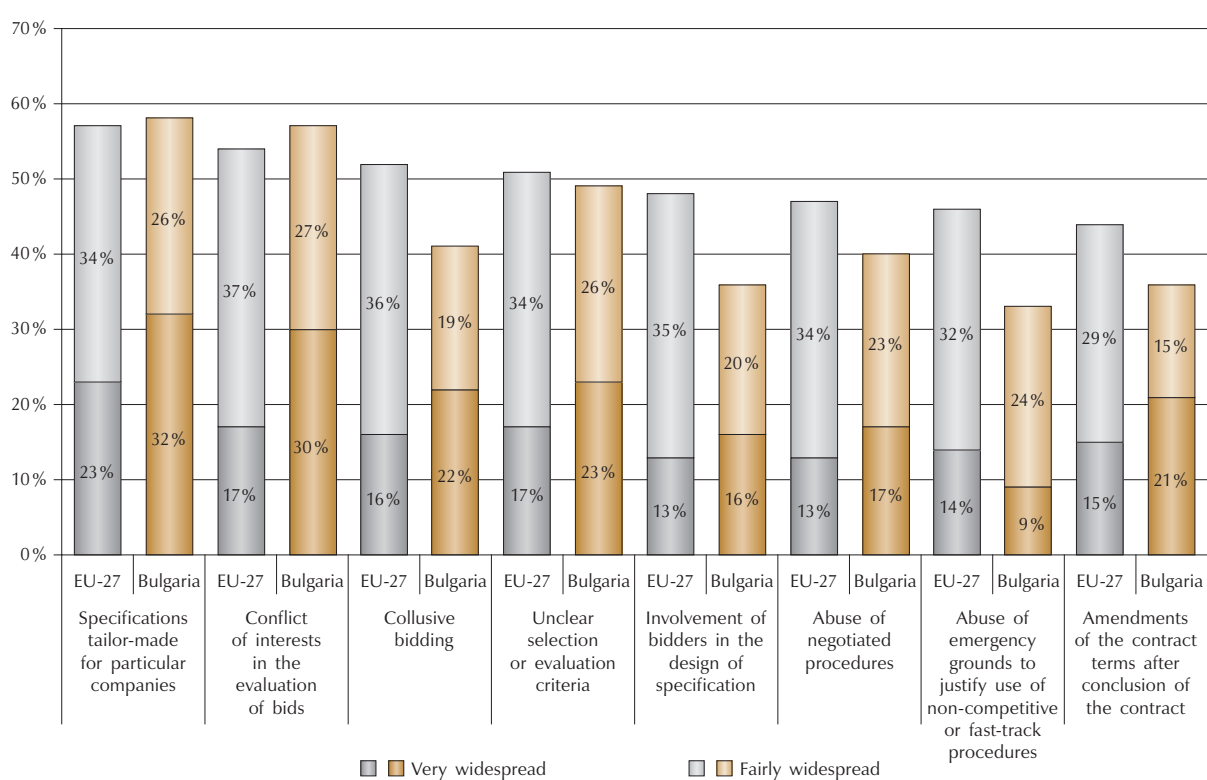
Checks by the Public Procurement Agency, the Public Financial Inspection Agency (PFIA) and the national Audit Office prove key instruments in ensuring transparency in public procurement. The violations of the public procurement law and procedures uncovered by the PFIA remain very high. The capacity of the Agency to tackle problematic public



procurement increases, but its deterrence and prevention effects are very limited and violations continue to be widespread. One reason is the constant political interference in the work of the agency, in particular in bigger public procurement contracts.<sup>58</sup>

An issue of concern remains the **share of non-competitive procedures** among the announced public procurements (25% in 2012 and 26.3% in 2013), including negotiated procedure with and without publication of a contract notice, which are generally considered an instrument particularly exposed to fraud and corruption.

**FIGURE 20. MOST COMMON IRREGULARITIES IN PUBLIC PROCUREMENT ACCORDING TO BUSINESSES**



Source: Flash Eurobarometer – Business, EC, 2013.

**TABLE 3. VOLUME AND NUMBER OF INSPECTED PUBLIC PROCUREMENT CONTRACTS PER YEAR (2007 – 2013)**

Year	Volume of the inspected PP contracts (million BGN)	Number	Volume of the PP contracts with discovered violations (million BGN)
2013	4,562	2,484	1,795
2012	2,044	2,446	1,488

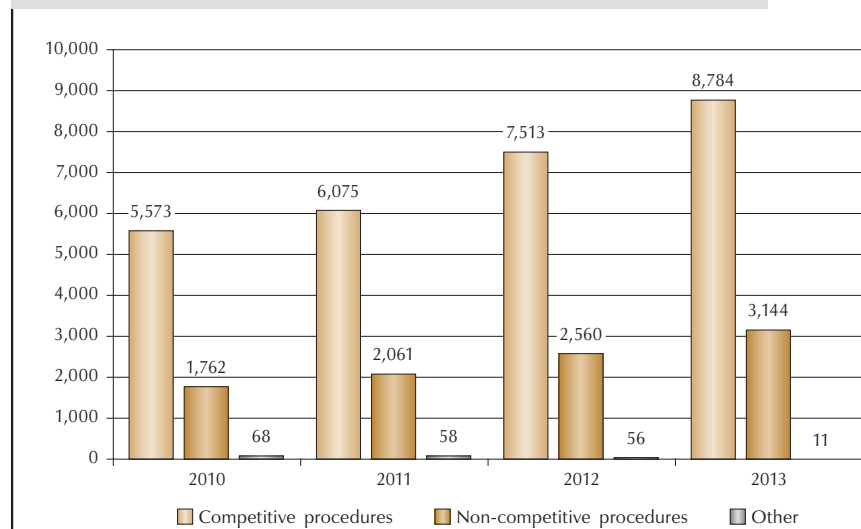
<sup>58</sup> Source: Stoyanov, A., R. Stefanov, and B. Velcheva. *Bulgarian anti-corruption reforms: a lost decade?* ERCAS Working paper #42 (2014).

**TABLE 3. VOLUME AND NUMBER OF INSPECTED PUBLIC PROCUREMENT CONTRACTS PER YEAR (2007 – 2013) (CONTINUED)**

Year	Volume of the inspected PP contracts (million BGN)	Number	Volume of the PP contracts with discovered violations (million BGN)
2011	1,459	1,368	1,060
2010	2,203	1,391	1,191
2009	1,084	1,140	660
2008	636	1,364	306
2007	1,031	1,529	601

Source: PPA Annual Reports; PFIA Annual Reports, 2013.

**FIGURE 21. NUMBER OF ANNOUNCED PUBLIC PROCUREMENTS BY TYPE OF PROCEDURE (2010 – 2013)**



Source: Public Procurement Agency.<sup>59</sup>

### The Price of Public Procurement Corruption in Bulgaria

The exact value of the losses due to corruption in public procurement in Bulgaria is hard to estimate. According to PFIA data, the volume of the public procurement contracts with discovered violations range from 601 million BGN in 2007 to 1,795 million BGN in 2013. The introduced ex-ante control of PPA on certain public procurement procedures of increased public interest has shown that about a third of the submitted

<sup>59</sup> Note: Non-competitive procedures include: (a) restricted procedures (incl. restricted fast-track procedures); (b) negotiated procedure (with the publication of a contract notice, fast-track negotiation with the publication of a contract notice, negotiation without publication of a contract notice) and (c) negotiated procedure following an invitation under the RSSPP (repealed). Competitive procedures include: (a) open procedure (incl. framework agreement) and (b) open contest under the RSSPP (repealed). Other procedures include (a) ex-ante selection systems; (b) project competition (open or restricted) and (c) project competition under the RSSPP (repealed).



documents did not comply with the requirements of the law, indicating high corruption potential from lack of professional capacity.

The European Commission has requested a study on the costs of fraud and corruption in public procurement in the EU, which has taken an alternative approach to estimate the losses from public procurement irregularities.<sup>60</sup> The report notes that out of the 18% calculated budget volume loss from corrupt/grey public procurements in the 8 analysed Member States, 13% of budgets' loss involved can be attributed to corruption. According to very rough estimations, if the same methodology is applied to Bulgaria, corrected with the country's score in Transparency International's Corruption Perception Index 2013 scores, the direct cost of corruption in public procurement as share of the overall value of the published public procurement contracts for 2013 could be assessed to be between BGN 334.1 mn and BGN 506.91 mn.

**TABLE 4. EX-ANTE CONTROL OF THE DOCUMENTS FROM PUBLIC PROCUREMENTS ACCORDING TO ART. 20B OF THE LAW ON PUBLIC PROCUREMENT (NEGOTIATED PROCEDURE WITHOUT NOTICE), IN FORCE FROM 1 JANUARY 2009**

	Number of procurement documents
The selected procedure is lawful	2,070
The selected procedure could be considered lawful if the Contractor presents sufficient evidence	419
The selected procedure cannot be considered lawful or the evidence is not sufficient	359
The selected procedure is illegal	132
No position available (suspended procedure)	127
<b>Total</b>	<b>3,107</b>

Source: Public Procurement Agency.<sup>61</sup>

## Corruption in the Energy Sector

The energy sector, an unliberalized market with few large privatized monopoly electric distribution companies, presents an **example for high political corruption risk** in Bulgaria. There are considerable economic interests at stake in the sector, with strong political lobbies and substantial financial resources involved. About one in four public procurement contracts relates to the energy sector, which renders it one of the biggest spenders of taxpayer money. While transparency has improved in

<sup>60</sup> Identifying and Reducing Corruption in Public Procurement in the EU, PricewaterhouseCoopers (PWC), Ecorys, June 2013.

<sup>61</sup> Note: Ex-ante control is implemented for EU Funds beneficiaries that procure in the areas of (a) construction – from BGN 264,000 to BGN 2.64 million or for (b) supplies, services and design contests – from BGN 66,000 to the respective threshold defined in Art. 45a, para. 2 of the Public Procurement Law.

recent years, the sector remains largely captured by vested interests and with large information asymmetries at the detriment of the consumers. Malpractices in the sector's governance are abundant in all its subsectors, but several **manifestations of the corruption risk** in the last three years should be noted:

- The findings of the 41st Parliament about serious malpractices in the energy sector, including the procedures for the construction of the Belene nuclear power plant have so far remained without any consequences. The publicized arrests of officials who took part in the project, without a clear picture of the general direction of the investigation, raised suspicions that these measures have been selective and politically motivated.
- The non-transparent model of decision making in the Belene Nuclear Power Plant (NPP) has been continued more recently in the handling of the South Stream gas pipeline project. Each of these projects is worth as much as the annual value of public tenders in Bulgaria. Yet, both projects have been developed without a clear strategic framework and without cost-benefit analysis. In the case of South Stream there have been clear signs of state capture, as the project has been continuously pushed forward by separate cabinet members in the end of 2013 and the first half of 2014, even though there have been increasing signs of rising risks to the project.
- The decision of the Bulgarian Parliament from 4 April 2014 to adopt at first reading the amendments in the *Energy Law*, which grants South Stream special status highlights the lack of logic in the national energy policy and compounds the impression that public interest is not the driving force behind the proposed changes. The subsequent revelations that this decision has been taken on proposal by the contractor are a very serious sign of state capture. Avoiding established procedures for coordination and consensus-building in the executive and circumventing common EU rules, the amendments to the *Energy Law*, which concern enormous public resources and long-term interests, have been introduced by two Members of Parliament (MPs).<sup>62</sup>
- In the electricity sector, the state-owned enterprises have continued to pile debts, squeezed by politically motivated freeze in the process and state-guaranteed private sector profits and subsidies. Frequent shuffles in the top management of the State Energy and Water Regulatory Commission, and changes in the energy-pricing model create opportunities for illegal access to regulatory decisions and two-way corruption pressure between the regulator and the business sector. There have been repeated signs that state-owned enterprises disregard important decisions, with hundreds of millions of public funds at stake, of their owner – the state, as represented by the respective line ministry. The government and the regulator have repeatedly failed to solve pricing frictions in the case of long-term contracts in the coal and renewables sectors, at the expense of the public purse.

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<sup>62</sup> CSD Media note: *Energy in(security): the parliament's decision on the South Stream pipeline increases the risks for Bulgaria's energy security*, April 4, 2014.

- In the fuels sector, the lack of transparency as to the compliance of the national refinery with the requirements of installing metering devices on inflows and outflows of products has continued to hang in the air after a spate of public confrontation between the refinery and customs authorities in 2012. Regular check-ups by the National Revenue Agency in the past three years have demonstrated that the share of illegal fuel market has not shrunk despite control measures, hinting at structural problems.

Over half of the public tenders in the energy sector are conducted through closed procedures. When audited, most of these procedures are found to contain irregularities and other abuses.<sup>63</sup> The most big energy projects (e.g. Belene NPP, Tsankov Kamak HPP and the rehabilitation of facilities) can serve as examples of the abuse of public procurement mechanisms.<sup>64</sup> In addition, previous CSD analysis of the management of key energy projects (Belene NPP, the Tzankov Kamak Hydro Power Plant (HPP) project, Maritsa Iztok 2 Thermal Power Plant (TPP), Toplofikacia Sofia, etc.) has revealed complete disregard for even basic rules of good governance, leading to skyrocketing project costs. The **failure of the checks and balances system** raises legitimate concerns about the state's ability to manage large-scale infrastructure projects worth over EUR 500 million.<sup>65</sup> There are several important trends that could be derived from the available data.<sup>66</sup>

#### Measures for Improving Governance in the Energy Sector<sup>67</sup>

- A detailed review of the financial control system of state-owned energy companies is necessary. It may include, among others, annual energy policy review by the National Assembly.
- The ex-ante and ex-post control should be strengthened; the number of inspections of public procurements in the energy sector should be increased, in particular the ones performed by the Public Financial Inspection Agency.
- Improving the functioning and management of state-owned energy enterprises by reducing political control over energy enterprises.
- Developing an emergency bailout plan for Bulgaria's energy sector in order for catastrophic scenarios to be avoided, implementing controlled wind-down of main financial strains such as long-term subsidies, followed by subsequent market restructuring, as well as introducing a liberalised market.

<sup>63</sup> CSD Policy Brief 43: *Corruption and Anti-Corruption in Bulgaria (2012 – 2013)*, CSD, November 2013.

<sup>64</sup> CSD (2013) *Addressing the Threat of Fraud and Corruption in Public Procurement: Review of State of the Art Approaches, Compendium*, and CSD (2011) *Anti-Corruption in Public Procurement: Balancing the Policies*.

<sup>65</sup> CSD (2011) *Energy and Good Governance in Bulgaria. Trends and Policy Options*.

<sup>66</sup> CSD (2014) *Good Governance and Energy (In)Security in Bulgaria*.

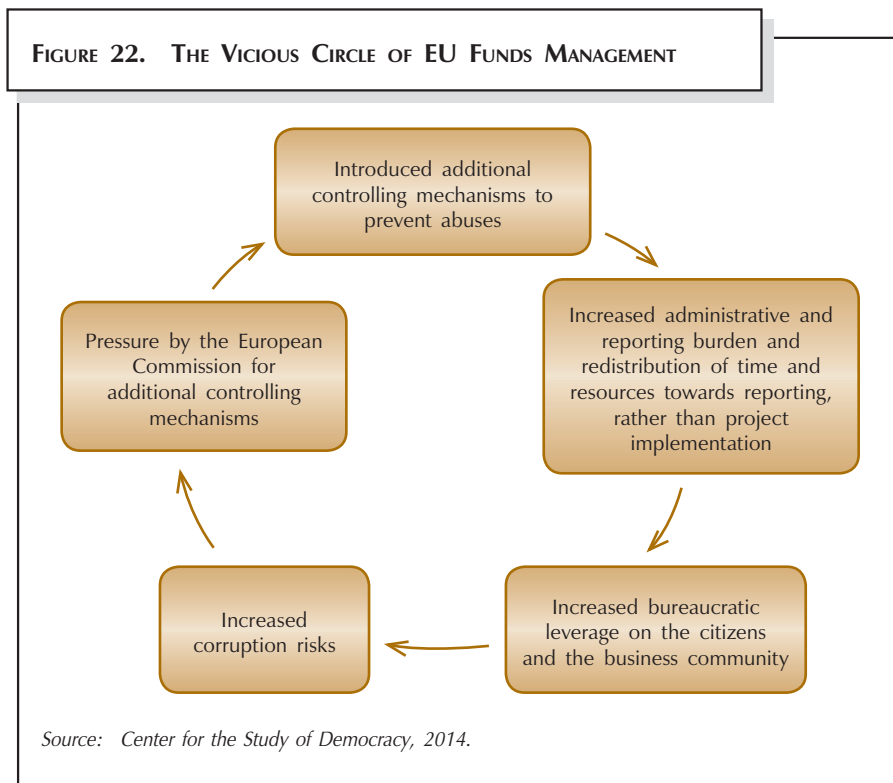
<sup>67</sup> Ibid.

- The current model of centralized administration and excess electricity production should give way to decentralized production, liberalization of the energy market, and adequate mechanisms to cushion vulnerable energy-poor groups against the transition.
- Decisions concerning major investment projects in the energy sector must incorporate comprehensive and transparent financial, economic, social, and environmental impact assessments. It is paramount that the current practice of signing contracts and agreements for large energy projects in the absence of information about the total costs is discontinued.
- Creating an energy information system and database, as well as registry of public procurement contracts of state-owned energy enterprises.

## EU Funds Management

The distribution of EU funds in Bulgaria is associated with **red tape and corruption vulnerabilities**. Although the managing authorities (MAs) perform strict technical and financial checks, various official evaluation reports and mid-term reviews note the continuing lack of administrative capacity and technical knowledge in the public administration.

One of the major identified shortcomings of the process is the focus placed on the documentation checks, and not on the evaluation of the actual impact and benefits of the money spent. The process is a typical vicious circle – the pressure by the European Commission leads to additional controlling mechanisms to prevent abuses, however this strengthens the “bargaining position” of the administration and increases its bureaucratic leverage on the citizens and the business community and increases corruption risks.



The corruption risks can be sought in several areas:

- **Large projects** are associated with corruption risks, similar to large public procurement contracts. The online information system for management and oversight of the EU Structural Instruments in Bulgaria (UMIS) presents data on the largest OP beneficiaries (mostly public entities), some of them awarded with 40 – 80 projects each for amounts ranging between BGN 500,000 (EUR 255,645) and BGN 2 million (EUR 1.02 million).

- **Burdensome administrative procedures.** The OPs application and implementation remain a relatively complex process due to excessive control procedures by the national authorities in order to prevent rule violations.
- **Public procurement contracts** requirements from EU funds beneficiaries impose an additional burden on the implementation and increase the risks of formal non-compliance. During the economic crisis this has resulted in the freezing of a number of procedures and the introduction of penalties which have been discretionarily taken up or not by the national budget. This has increased corruption risks, in particular among large-scale contractors and municipalities.
- **Lack of understanding on the technical specifics** of the implemented projects can easily lead to misinterpretation of the results. Although the MAs use external experts in different areas for evaluation of project applications, expert knowledge and consultations are not readily available on all stages of the project monitoring process.
- **Achieving fast absorption for the 2007 – 2013 period** and preparing for the next 2014 – 2020 programming period is another corruption risk factor. The end of the programming period 2007 – 2013 was marked by an increase of the number and value of contracts, as well as by increased payments, to compensate for the initial low absorption rates. This led to less control and a shift from competitive distribution of funds to direct contracting.<sup>68</sup>

According to the latest available report by the AFCOS Directorate to the Bulgarian Ministry of Interior, the forefront institution to protect EU financial interests, the following irregularities with EU Funds should be noted, although they date back to 2011 (the time of the latest available report).<sup>69</sup>

- European Agricultural Guarantee Fund and European Fund for Rural Development: 149 cases of financial irregularities for EUR 5,356,732.
- Structural Funds (European Regional Development Fund and European Social Fund): 49 cases of financial irregularities for EUR 5,423,511.
- Cohesion Fund: 2 cases of financial irregularities for EUR 571,350.

**Examples of needed improvement** in the cooperation of AFCOS with EU funds' directorates include:

- Introduction of timelier relaying and investigation of signals rather than work only on planned inspections.
- Lack of timely updates to the information entered in the records of received signals for irregularities.
- The follow-up activities and other changes in previously reported cases of irregularities are not reported to AFCOS.
- Delays in taking measures for forced recovery of undue or over-payments, as well as unduly or improperly utilized resources.

<sup>68</sup> Resume of the mid-term evaluation of Operational Programme "Environment" for the period 2010 – 2010, Association European Analyses and Evaluations, 2012, [http://ope.moew.government.bg/files/useruploads/files/Evaluation/resume\\_interim\\_evaluation.pdf](http://ope.moew.government.bg/files/useruploads/files/Evaluation/resume_interim_evaluation.pdf)

<sup>69</sup> AFCOS Directorate to the Ministry of Interior, 2011 Annual report, [http://afcos.bg/upload/docs/2012-06/Doklad\\_2011\\_final.pdf](http://afcos.bg/upload/docs/2012-06/Doklad_2011_final.pdf)

