EUROPEANIZATION OF REGIONAL POLICY IN BULGARIA – THE ESTABLISHMENT OF A REGIONAL LEVEL OF GOVERNANCE

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List of Abbreviations:

CEECs – Central and Eastern European Countries
EC – European Commission
ERDF - European Regional Development Fund
ESF - European Social Fund
EU – European Union
HI – Historical Institutionalism
MLG – Multi-level Governance
MRDPW - Ministry of regional development and public works
NUTS - Nomenclature of Territorial Units for Statistics
OP – Operational Programme
RD – Regional development
RDA – Regional Development Act
RP - Regional policy
ABSTRACT

The study has intended to analyze the Europeanization of the institutional structure for regional policy in Bulgaria after the first programming period of the country as a full-fledged member state of the EU. Bulgaria joined the EU in 2007 as part of the so-called ‘Eastern Enlargement’ that was characterized by power asymmetry and strong conditionality. The study employs two research methods – document analysis of key policy documents and legislation, as well as qualitative interviews with key respondents with involvement or experience in the field of regional policy and development in Bulgaria. The analysis is underpinned by the concept of Europeanization and historical institutionalism which complement each other in order to explain the changes and the reasons for them. The main findings show that the EU requirements are only ‘accommodated’ in the already existing institutional structure of Bulgaria and real transformation has not occurred. The established regional level still does not have a significant role in the regional policy of the country because it represents neither self-government, nor administrative unit. The research suggests directions for future reform and refinement of the current institutional system with regard to the better formulation and implementation of regional policy in the country.
INTRODUCTION

The Cohesion Policy is one of the most debated policy areas of the European Union. The overarching objective of EU regional policy is striving for socio-economic cohesion by reducing disparities in development between regions and improving competitiveness of the poorest areas of the EU. The European integration process has provoked serious debates in the academic literature on the question whether and to what extent the domestic regional policies and governance arrangements have been transformed by it. This research seeks to explore the ‘Europeanization’ effects on the institutional structure of the policies in the field of regional development in the case of one Eastern-European member state – Bulgaria. Following the communist regime, the country was characterized by strongly centralized policies aiming at sectoral development rather than territorial cohesion, in other words, there were no regional development policies as such. The incentive for the transformation was given in relation to the pre-accession process (1991-2005) of Bulgaria to become a member-state of the EU. The aim to join the Union was the real catalyst for domestic change not only in Bulgaria but in all Central and Eastern European countries (CEECs) sharing common features in their historical background. In this regard, Bulgaria has started slowly the transformation towards regionalization which became part of the official political program of the European Commission after 1997 when all candidate states were obliged to implement the “Acquis Communautaire”. Thus, the role of the EU was substantial in the formulation of regional policy in Bulgaria. As a result of the difficult years of transition towards democracy after 1989, the EU was seen not only as an opportunity for financial support but as a model of successful policies, good practices and, in general, hope for better future. Consequently, the Cohesion policy has been employed as a benchmark for designing approaches and instruments and defining priorities for regional development in Bulgaria.

The complexity of the process of mutual influence between the EU and the member states has been captured by the concept of “Europeanization”. The concept was successfully ‘transferred’ to explain the relations between the supranational actor and the new member states after the major ‘Eastern’ enlargement in 2004, and the further enlargement in 2007 when Bulgaria and Romania joined the Union. A number of academic papers have been published that are theorizing and analyzing these processes, and debates on the relation between Europeanization and the regionalization of the new EU member-states has emerged.
as something novel and opposite to the aforementioned centralized unitary states. The establishment of regions and the mobilization of the actors on this level refer to the creation of a system of multi-level governance which is another modern concept in the context of the EU.

As already mentioned, the Europeanization concept has been an inspiration for a number of studies in different policy areas in the member states. The complexity of the process has also been studied in the case of Bulgaria by several authors mainly during the pre-accession period or at the beginning of the membership of the country in the EU. These papers, although investigating variable aspects of the Europeanization and presenting useful information, were based on preconceptions and initial steps towards transformation of the institutional system due to the time period they were carried out. Consequently, the present study aims to provide current analysis of the situation of the institutional structure for regional development in Bulgaria after the first programming period as a full-fledged member of the EU and thus filling the ‘gap’ in the literature. But “simply doing what no one else has done is not sufficient” (Pratt, M., 2009, p. 858) and for this reason the rationale for the research is presented. Analyzing the effects of the Europeanization in Bulgaria at the end of the first programing period of the country as a full-fledged member is of high relevance. The reason is that the 2007–2013 period can be defined as a transitional one between the pre-accession period, which was focused on capacity building, and the current period 2014-2020 where the main emphasis is now on improving the regional economic development of the country. Thus, a thorough analysis of the institutional structure pointing out its strengths and weaknesses is necessary to allow functioning regional policy in the period 2014-2020. Moreover, the complex relations between the local, regional and national level in the institutional framework for policy implementation in each country are unique, regarding the variety of political systems in the EU and, therefore, their in-depth analysis is important for the better understanding of their functioning because there is no right or wrong model. The rationale for carrying out this research is further justified in the following paragraphs.

OBJECTIVES AND RESEARCH QUESTION

The Europeanization process in the member states has been an interesting topic for a number of studies, furthermore, during the last several years it has been analyzed as a process influencing countries even beyond the official borders of the EU (see Schimmelfennig, 2009).
The Europeanization concept is further discussed in the following chapter but, generally, it refers to the changes occurring as a result of the mutual interaction between the EU and the member-states. The objective of the current study is to investigate whether, and if so how, the institutional arrangements for regional policy in Bulgaria have become ‘Europeanized’ during the pre-accession period and the first programming period (2007-2013) for the country as a full-fledged member of the EU. More specifically, the analysis pays special attention to the role of the established regional level in formulation and implementation of the regional policy. ‘Regions’ did not exist in Bulgaria before the accession to the EU. The main objective of the study is thus to analyze the role of the regional level, however, this is not possible without the first step of in-depth analysis of the Europeanization of the institutional arrangements for regional policy. The research is based on analysis of official documents and laws. Furthermore, the author has the ambition to go beyond the formal practices and relations between the different actors from the local, regional, national and supranational levels as stated in the official legislation and to examine the institutional structure from the actor’s perspective which requires empirical research by interviewing key informants. Thus, the study seeks to grasp the perceptions of the people working in the system or related to it in order to better understand the institutional arrangements, and, this way to draw up conclusions based on two different sources of information.

In order to accomplish the objectives of the research and with regard to the comprehensiveness of the paper, the work is steered by the following central research question:

*What are the effects of the Europeanization process on the institutional framework for regional policy in Bulgaria and what are its current challenges and opportunities?*

This broad question is divided into a set of sub-questions in order to facilitate the author’s endeavor to carry out a comprehensive research:

1. Which legislative changes took place in Bulgaria as a result of the Europeanization process and the EU requirements (as set out in the *acquis communautaire*) in the field of regional policy?
2. What changes took place in the Bulgarian institutional arrangements for regional policy as a result of the Europeanization process (from the start of the pre-accession period to the end of the first programming period of Bulgaria as a member-state of the EU)?
3. What is the current institutional structure for regional policy in Bulgaria and what is the explanation behind its design?

4. What is the role of the established regional level of government in the institutional system for regional development and how has this become Europeanized over the past years?

5. How is the institutional system for regional development perceived by stakeholders and Bulgarian experts on regional policy with regard to its performance in formulating and implementing the regional policy in the country?

SOCIAL AND SCIENTIFIC RELEVANCE OF THE RESEARCH

Addressing the aforementioned research questions and accomplishing the objectives of the study will contribute to a better understanding of the functioning of the institutional framework for policy-making and implementation of the regional policies in Bulgaria. The country is still lagging behind in terms of economic development and is considered one of the poorest countries in the EU (Eurostat, 2014) which is an important reason for investigating how significant EU Cohesion Policy funding is being managed and implemented. Thus, the in-depth analysis of the institutional system is the first step towards addressing the current challenges in formulating and implementing regional policy in Bulgaria, therefore, it has high societal relevance. Moreover, it could be employed by the policy-makers and all stakeholders as a useful source of information linking the theory and practice in relation to the institutional arrangements for regional policy in the country. The topic is also highly relevant at the beginning of the new programming period 2014-2020 allowing the outlining of problematic areas and capitalizing on the previous experiences that should be addressed by the Bulgarian politicians. Moreover, based on the findings of the study, the author presents options for future changes in the current institutional systems aiming at its better performance in terms of regional policy that makes real results on the ground. The study puts on the agenda the debate of the state of decentralization in the country. Thus, the better understanding of the arrangements for regional policy in Bulgaria is important not only for the national government as the main entity responsible for this policy, but also for the sub-national actors that would be directly affected by eventual reform. The social relevance of the present research can also be positioned in the broader picture of the EU, where understanding of the Bulgarian regional
The scientific relevance of the paper is no less important than the societal one. The paper contributes to the general discussion on the Europeanization process and is to shed light on the follow-up processes in this particular Eastern European member state. Thus, the study addresses the existing gap in the literature regarding the analysis of the current state of the institutional structure in Bulgaria. It would provide important information for the further theorizing on this complex process happening in each country of the EU. The in-depth analysis of the evolution of the regional policy arrangements in Bulgaria as a response to the Europeanization process could be useful for the further refining of the Europeanization concept in the direction of capturing the particularities of the process in the CEECs. The combination of the Europeanization concept and the historical institutionalism employed in the study gives insight in, both, formal and informal institutions and thus contributes to the discussion on the tension between a uniform EU policy framework and the challenges to adjust this to vastly different contexts across the EU. Thus, the research is of high significance for the EU policy-making in the light of the increasingly diverse EU. The research could also be a useful source for the future member states of the Union, such as Serbia, Montenegro and Turkey, which are likely to undergo similar transformations in their institutional arrangements for regional policy.

**STRUCTURE OF THE RESEARCH**

The research is organized in seven chapters. The following chapter presents a review on the relevant literature on the topic and presents the basic concepts underlining the research. Based on this, the theoretical framework is elaborated including the Europeanization concept and the theory of historical institutionalism. The study continues with a discussion of the methodology employed in order to achieve the objectives set. The chapter outlines the ontological and epistemological underpinnings of the study, presents the research strategy and designs and reveals the particular research methods adopted for the study, together with justification for their choice. Chapter 4 starts with a brief historical background of the institutional arrangements in the country, and continues with the analysis of the changes and
the current state of this structure based on official documents and legislation. The fifth chapter builds upon that and presents the results and findings of the empirical research based on interviews. The last chapter summarizes the main conclusions of the study and gives recommendations for possible futures changes in the institutional structure for regional policy in Bulgaria.

**LITERATURE REVIEW AND THEORETICAL PERSPECTIVES**

The section presents a critical review of the relevant academic literature in relation to the topic of discussion and the theoretical perspectives employed in the study. The aim of this exercise is to position the current research among the available academic works, and, at the same time, to analyze the existing knowledge on the topic in order to lay down the foundation of the paper. To make the critical review comprehensive, the section starts with three sub-sections that are particularly relevant: The concept of Europeanization, Europeanization process in other member states, Europeanization of the regional policy in Bulgaria (Fig. 1). After that the definition employed for the analysis of the paper is presented as an operationalization of the concept. This is followed by completion of the theoretical framework by presentation of the historical institutionalism.

![Figure 1. Structure of the literature review](image-url)
‘Europeanization’ has been very fashionable term in the social science researches over the past decades, used to shed light on the variety of changes occurring as a result of the interaction of the European policy and the member states. The aim of this section is to reveal the general ideas and the development of this concept in the literature. The concept of Europeanization has significantly evolved over time and its wide scope encompasses several aspects of the process of mutual influence between the EU and the member states. Bache (2005, pp. 3-4) presents useful categorization of the approaches towards Europeanization used in the literature, emphasizing the fact that some of them overlap to some extent:

“1. The top down impact of the EU on its member states.

2. The accumulation of policy competences at the EU level.

3. The growing importance of the EU as a reference point for national and sub-national actors.

4. The horizontal transfer of concepts and policies in the EU between member states.

5. The two-way interaction between states and the EU.

6. A discursively constructed external constraint on national autonomy or ‘smokescreen’ for domestic political manoeuvres.”

Analyzing these categories we can conclude that the Europeanization concept includes bottom-up and top-down perspective on the complex process of interaction between the EU and the member states. However, here we can see that a horizontal dimension is also added, showing the existing exchange of ideas, beliefs or concepts between the member states in the commonly shared arena represented by the EU (Dühr, Colomb, & Nadin, 2010) (Fig. 2).
Up to the 1980s the term ‘Europeanization’ has been mentioned very rarely, while at the 80s and especially the 90s its use has grown exponentially with a number of researches trying to explain difficult processes in the context of the European Union (Featherstone & Radaelli eds., 2003). We can differentiate two main periods in the studies on this topic, referred to as the ‘two generations’ of the Europeanization analyses (Dyson & Goetz, 2003): first generation around the 1970s till 1990s - focusing on the formal aspects of changes in relation to the EU, and, second generation emerging after the 1990s analyzing the process in a broader way, analyzing the effect on informal institutions such as ideas and discourses (Bache, 2003). Another significant difference between the two generations is that the first one analyses the Europeanization as a top-down vertical approach, while the second generation employs the term already as a two-way process of top-down and bottom-up, as well as horizontal interactions between the actors of the different levels.

Another categorization of the analyses on Europeanization in the literature can be delineated on the direction of the studied phenomena that were already mentioned – whether bottom-up or top-down perspective has been employed. Bottom-up dimension or the ‘uploading’ perspective on Europeanization analyzes the institutional building and the
emergence of policies on the EU level as a result of the involvement of the member states. For instance, Cowles et al. (2001, p. 3) have defined Europeanization as “the emergence and development at the European level of distinct structures of governance, that is, of political, legal, and social institutions associated with political problem solving that formalize interactions among the actors, and of policy networks specializing in the creation of authoritative European rules”. Moreover, George (2001, p. 1) deliberates that “member states are not simply passive recipients of pressures from the EU; they also try to project national policy preferences upwards”.

On the other hand, top-down approach or ‘download’ perspective on Europeanization suggests that domestic change has taken place as a result of the pressure coming from the EU. Most of the researches on Europeanization have been studying this perspective. Moreover, increasingly the analysis of the top-down approach includes also the sub-national actors, not only the national level. Although there is a growing interest on all different aspects of the Europeanization process, the top-down perspective is still broadly used in the academic papers (Dühr et al. 2010). Especially, in the case of the negotiations of the CEECs with the EU during the ‘East’ enlargement, the conditionality was strengthened and thus the asymmetry between the supranational and national actors has resulted in limited possibility for uploading domestic preferences. All counties, including Bulgaria had to adjust their institutional systems through implementation of the requirements set by the EU, which represents the download perspective of the Europeanization process. Bulgaria, as other CEECs, had to introduce a regional level of government; hence, in this case the Europeanization and the regionalization processes are directly related. Thus, the download perspective provides a suitable theoretical framework for investigation of the domestic responses to the influence of the EU and, therefore, it is highly appropriate for the objectives of the current study. Bulgaria has undergone great changes in the institutional arrangements as a response to the EU requirements during the pre-accession period, thus applying the Europeanization concept allows the author to examine the domestic change. However, in order to do so, a further operationalization of the download approach of the concept is provided in the next sections.

EUROPEANIZATION PROCESS IN OTHER MEMBER STATES

The concept of Europeanization has been employed in a number of studies in order to analyze the interactions between the EU and the member states. Most of the papers investigating the
Europeanization in the context of a particular member state have employed the ‘download’ perspective or what is the impact on the national level in terms of policies, polity or politics (Bulmer & Burch, 2001; Héritier, et al. 2001; Radaelli, 2000) and what is the domestic response to this pressure (Börzel & Risse, 2000; Börzel, 2002, Wishlade, 2003). In this line, various definitions of the concept have been presented, for instance, Börzel (1999) in her study on the impact of Europeanization on the territorial institutions of Spain and Germany, has defined the process as “process whereby domestic policy areas become increasingly subject to European policy making”.

Employing different definitions of Europeanization, the studies on this topic have usually adopt a very particular focus (Bomberg & Peterson, 2000), for instance, specific investigation of a specific area of policy or development of specific institutions or the change of social ideas and beliefs. In most of the existing literature the analysis is focused on one or few member states. For instance, Soetendorp and Hanf (1998) analyze the Europeanization of small states; Schmidt (1997) compares the Europeanization in Germany, France and the UK; Börzel (1999) has studied the domestic adaptation to Europeanization in Spain and Germany. A lot of interest is paid to the EU-15 countries: Bulmer and Paterson (1987) – have analyzed the effects of the EU on Germany, Goetz (1995) – also Germany, Ladrech (1994) – studied France, Bulmer & Burch (1998) analyze the change in the British political machinery, Bache (2005) has studied the relation between multi-level governance and Europeanization in Britain, Gualini (2003) has explored the relationship between Europeanization and the Italian regional policy. In contrast to the analysis of separate or few countries, an interesting study of the Europeanization effects on the member states is presented by Wishlade, Yuill & Mendez (2003) where they analyze the competition policy and the regional policy in all member-states of the EU (EU-15). The study investigates how the EU regional aid and state aid regulations influence the member-states regional policies. It discusses the evolution of area designation as part of the EU competition and regional policies, shedding light on the dynamics of policy development. Important aspect for the present study is the designation for regional aid on the basis of the NUTS2 regions which is a key requirement for the accession of Bulgaria to the EU.

Moreover, it should be noted that the Europeanization concept when used to explore a specific country or group of countries is usually combined with other theory or concept in the aforementioned studies. For instance, there are a number of studies focusing on the institutional arrangements or governmental structures in the current or candidate member-
states that have combined the Europeanization concept with Multi-level governance or institutionalism - Andreou & Bache (2010), Bafoul (2010), Bailey & De Propris (2002), Börzel & Risse (2000), Bulmer & Burch (1998), Bruszt (2008), Ertugal (2010), Gualini, (2003), Gwiazda (2013) and others. For this reason, the MLG concept and the historical intuitionism are considered appropriate for this study.

The current paper would be best positioned among the studies analyzing the Europeanization of the Central and Eastern European countries. This part of the literature has developed and has been vastly growing since the 2004 and 2007 enlargements of the EU. Until then the studies have focused on analyzing the EU-15 member-states, while with the future enlargements the literature has extended to analyze applicant countries which have experienced similar pressures in their desire to become part of the Union (Grabbe, 2003). The Europeanization of the CEECs has been marked with the signs of “asymmetry and conditionality” (Dimitrova, 2002; Grabbe, 2001). Examples of this strand of literature are the following researches: Andreou & Bache (2010) – Slovenia, Buzogány & Korkut (2013) – Hungary, Dobre (2010) – Romania, Gwiazda (2013) – Poland, Lajh (2004) - Slovenia, Raagmaa, Kalvet, & Kasesalu (2014) – Estonia, and many others. This new dimension of the Europeanization in the CCECs in terms of conditionality and accession negotiations has been of great interest to scholars.

The aim of this overview was to show the variety of studies analyzing different aspects of the Europeanization process in order to provide broader background information for the study, to identify relevant theoretical underpinnings and to show key aspects of the Europeanization, relevant to the present research.

EUROPEANIZATION OF THE REGIONAL POLICY IN BULGARIA

Following this trend in the literature, Bulgaria has been a subject of study in the context of Europeanization, to date mainly analyzing the period before accession to the EU. The discussion of the Europeanization of the regional policy in Bulgaria has emerged in regard to the pre-accession negotiations of the country with the EU. In his paper Monastiriotis (2008) analyzes the Europeanization of the regional policy focusing on the social-economic aspects of the regional conditions in which the regional policy in Bulgaria has emerged. The author concludes that as a result of the historical background of the country, the regional policy has
faced various constraints. However, the country managed to develop a regional policy framework consistent with the EU legislation. The study has identified relative centralization in the implementation based on analysis of the pre-accession programmes in the country as PHARE and ISPA. Yanakiev (2010, p. 45) has also come up with a similar conclusion stating that the Europeanization of the regional policy in Bulgaria has resulted in “the creation of a weak system of multi-level governance dominated by the central government”.

Another interesting analysis is presented by Minkova (2004) in her paper “Defining the new role of the regions in overseeing and coordinating regional development in Bulgaria”. It explores in detail the changes in the regional development framework starting before 1989 until 2004. The investigation is based on national legislation and documents. In the end, the author presents different policy options for reforms on the policy. It provides an interesting perspective before the accession which could be taken into consideration in the analysis together with the real policy changes that have occurred after the paper was written.

In her paper, Nikolova (2007) examines the reforms in the sub-national governance in Bulgaria after the fall of the communist regime and during the pre-accession in relation to the Europeanisation and the domestic responses. The paper concludes that the EU has a crucial role on the development of the regional policy, however, the introduced formal changes had a limited impact on the informal understandings and beliefs on the ground. She emphasizes that “coherent regional policy did not exist in Bulgaria [before the start of the pre-accession negotiations] and when it was introduced it was largely inspired by the EU requirements” (Nikolova, 2007, p. 20)

The presented studies are very relevant sources of information and are employed in the analysis of the current research. It should be noted, however, that all of the presented studies are analyzing different aspects of the Europeanization of the regional policy in Bulgaria, not only the institutional change which is the main focus here. Moreover, the studies are focusing on the pre-accession period, while the present research takes the discussion forward by analyzing also the follow-up processes during the first programming-period of the country as an EU member-state. Thus, it fills the gap in the existing body of researches on the current state of the situation in Bulgaria after one programming period has elapsed.

On the basis of the literature review a suitable theoretical framework to serve the objectives of the study has been chosen. From the title of the research it’s obvious that the general theoretical foundation builds on the concept of Europeanization.
EMPLOYED DEFINITION AND OPERATIONALIZATION OF THE EUROPEANIZATION

As already shown, the literature presents a number of different definitions for Europeanization, each emphasizing different aspects of the process and indicating the lively academic debate on the concept. Ladrech (1994, p. 69) has been one of the first that have tried to define the process, elaborating that Europeanization is a “process reorienting the direction and shape of politics to the degree that EC political and economic dynamics become part of the organizational logic of national politics and policymaking”. However, more suitable definition guiding the analysis of the research is needed. Widely cited definition of Europeanization in recent years is provided by Bulmer and Radaelli (2004, p. 4), suggesting that Europeanization consists of “processes of a) construction b) diffusion and c) institutionalisation of formal and informal rules, procedures, policy paradigms, styles, “ways of doing things” and shared beliefs and norms which are first defined and consolidated in the EU policy process and then incorporated in the logic of domestic (national and subnational) discourse, political structures and public policies”. This explanation of the concept is useful for the current paper because it emphasizes the top-down perspective of the process. At the same time, it provides a useful framework for analysis on member states because it segregates the process of Europeanization into three components which facilitate the analyses of different aspects of the process.

Although acknowledging that the Europeanization is a two-way process (and also has a horizontal dimension) the paper strictly delimits itself to the top-down perspective of the process in line with the suggested research questions and, therefore, understands it as a “process by which domestic policy areas become increasingly subject to European policy-making” (Börzel, 1999, p. 574). Bomberg & Peterson (2000, p. 5) and Börzel & Risse (2000, pp. 3-4) elaborate that the EU can influence three main domains in the domestic arena: policies, politics and polity. The objectives of the study refer to the polity domain which includes the impacts on the political institutions, therefore the polity domain of the Bulgarian regional policy is concerned.

In order to fully operationalize the concept of Europeanization, the author adopts the conceptual framework for the analysis of the domestic responses towards the influence of the EU developed by Börzel & Risse (2000). Starting point in this framework is the concept of ‘misfit’ between the “European and domestic policies, processes, and institutions” (p. 5, see
also Duina, 1999). The authors suggest that the higher the misfit between the EU and the member state, the higher the adaptational pressure on the domestic level. Therefore, misfit to some extent is a necessary condition for domestic change. However, this is not the only factor influencing the change - it depends on the actors and institutions responding to the adaptational pressure (Börzel & Risse, 2000). Thus, the analysis of the institutional change in Bulgaria follows the presented conceptual framework which includes some aspects of institutionalism which is discussed in the next section (Fig. 3). Börzel & Risse (2000) present systematically the domestic change into three categories corresponding to the degree of the change:

- **Absorption**: low degree of change where the misfit between the European and domestic policies, processes, and institutions is not high and the member states don’t need to conduct substantial readjustments;
- **Accommodation**: medium degree of change where there is adaptational pressure on the member states and they ‘incorporate’ new policies and institutions onto existing ones without changing the latter;
- **Transformation**: high degree of domestic change where the member states replace existing policies, processes, and institutions by new or alter existing ones substantially.

Employing the aforementioned criteria and ideas for assessing the domestic change the analysis of the Bulgarian institutional arrangement starts by demonstrating the misfit between the domestic and EU institutions, followed by investigation of their transformations in order to define the degree of change.
As already presented the download perspective of the Europeanization is a suitable concept to underpin the analysis on the changes of the institutional structure for regional policy in Bulgaria. However, it is not sufficient to accomplish the objectives of the study because it does not provide basis for the analysis to explain the current institutional framework in the context of the EU and also does not contribute to reveal the role of the regional level.
introduced in the country. In order to address these limitations the author employs another influential theory in the field of political science – historical institutionalism.

Historical institutionalism (HI) is part of the so called ‘new institutionalism’ which also includes the rational choice institutionalism and sociological intuitionism that were developed during the 1960s and 1970s (Hall & Taylor, 1996). These schools of thought have emerged in line with the understanding that “‘institutions’ are key to the outcome of decision-making processes” (Dühr et al. 2010, p. 106). Thus, all three approaches aim to explain the role that institutions play in the determination of the social and political outcomes.

The main criticism on the rational choice and the sociological institutionalism was that they provide a static analysis of the situation. As a response, the historical institutionalism was developed, providing recognition of the institutions’ evolution over time. Thus, HI, along with sharing common features with both rational choice and sociological institutionalism, goes beyond them, emphasizing that “history matters”. For this reason it’s employed in the present study that aims to analyze the institutional evolution in Bulgaria. HI implies that “the paths chosen early on in the existence of an institution tend to be followed through the institution’s development” (Dühr et al. 2010, p. 107). As Schmidt (2006, p. 103) explains HI “works best at delineating the origins and development of institutional structures and processes over time”. This is one argument for the choice of the theory in the research – it provides an analytical framework for the changes over time that have resulted from the accession of Bulgaria to the EU. The following discussion on the theory provides more justification for the appropriateness of the HI for the aims of the research.

In order to understand better the historical institutionalists’ approach it is important to explain what is meant by ‘institutions’. Institutions are defined as “the formal or informal procedures, routines, norms and conventions embedded in the organizational structure of the polity” (Hall & Taylor, 1996, p. 938). Thus, the meaning of the term is broader than the understanding of institution in the EU context, e.g. the European Commission or the European Parliament. Another useful definition in this line is the one presented by North (1990) stating that “Institutions are the rules of the game in a society or, more formally, are the humanly devised constraints that shape human interaction”. This implies that there is an inevitable relation between the formal and informal institutions and the individual’s behavior. North also distinguished between formal (written rules, policies, and laws) and informal institutions (beliefs, customs, traditions). North (1990, p.36) states, “it is much easier to describe and be
precise about the formal rules that societies devise than to describe and be precise about the informal way by which human beings have structured human interaction”. However, the methodology of the study is developed with the attempt to overcome this limitation and to go beyond the formal arrangements and shed some light on the informal institutions by interviewing people working in the field of regional development. Due to the difficulties to measure and assess the informal institutions they will be used based on the respondent’s statements in order to understand the changes in the formal institutions.

Furthermore, more features of the HI other than the acknowledgement of the development of institutions over time and the understanding of the institutions as formal and informal make the approach suitable for the aims of this research. The first one is that the HI analyses the relationship between the institutions and individuals in generally broad terms. According to HI institutions affect the behavior of individuals in two ways that are called ‘calculus’ and ‘cultural’ approach (Hall & Taylor, 1996, p. 939; Schmidt, 2006, p. 107). The former suggests that the individuals will act strategically and from all options they will seek the one that is going to maximize their benefits. This approach also views the institutions as providing a framework for understanding the behavior of the other actors. Moreover, the calculus approach sees that institutions persist over time because individuals perceive the change as implying worse situation than keeping up the old patterns. On the other hand, the cultural approach doesn’t view the individual as always acting strategically but it rather depends on his/her worldview. This means that individuals often use paths that are already familiar to achieve their goals. The cultural approach focusing on the individual’s worldview suggests that the institutions provide the moral templates which underpin the human’s behavior. However, HI doesn’t view the two approaches as mutually exclusive. Thus, depending on the Bulgarian context they will be used to explain the choices from which the current institutional structure for regional development resulted.

A second distinctive feature of HI is that it suggests power asymmetries in the relations of different groups during the evolution of institutions. Thus, some social groups or interests are provided with uneven access to the decision-making process with the outcome that “some groups lose while others win” (Hall & Taylor, 1996, p. 941). Another characteristic of HI is that it acknowledges the importance of other factors besides the institutions to the political discourse. These are, for instance, the socioeconomic development and the diffusion of beliefs and ideas.
The final important aspect of HI which is important for the analysis of this research is the key concept of ‘path-dependency’. In this context, path-dependency can be understood as a concept suggesting that “the historical track of a given institution or polity will result in almost inevitable occurrences” (Dühr et al. 2010, p. 108). Moreover, it is implied that the same ‘operational forces’ will rarely generate the same results because a great influence on these process is played by the context of the particular situation which is “often inherited from the past” (Hall & Taylor, 1996, p. 941). In terms of the Europeanization of the Bulgarian framework for RD this is translated that the effects are likely to be different from these in other countries that have different historical background.

Although the effect of the path-dependency on the future institutional development is strong, “critical junctures” also take place (Hall & Taylor, 1996, p. 942). These are points in time when a substantial institutional change occurs. However, for this research the delineation between ‘critical juncture’ and ‘critical moments’ elaborated by Bulmer & Burch (2001) is employed. They argue that a ‘critical moment’ is when an opportunity for a significant change arises but whether this opportunity will be exploited is uncertain. If the opportunity is realized it becomes ‘critical juncture’ when the old patterns are substantially changed. This results in ‘branching points’ at which the development of the institution moves on a new path (Bulmer & Burch, 2001, p. 82). Usually, historical institutionalists suggest that the critical junctures result from economic crises or similar ‘shock events’. However, for the aims of the analysis we will understand the accession of Bulgaria in the EU as a ‘critical moment’ giving opportunity to institutional change.

Using these ideas in the analysis allows to explain how and why changes of the institutions have or haven’t occurred in Bulgaria. The HI is viewed as complementary to the Europeanization concept for this research because the response of Bulgaria to the adaptational pressure coming from the EU should be understood “as part of continuous process, and one in which informal institutional features, along with norms, are of considerable significance” (Bulmer & Burch, 2001, p. 74). Moreover, the Europeanization has effects on the distribution of power and competences among the administrations and actors from different territorial levels and the HI allows further analysis of this process.
SUMMARY OF THE THEORETICAL FRAMEWORK

Based on the literature review a theoretical framework was adopted. It serves as theoretical foundation of the following analysis and is based on two concepts – Europeanization and historical institutionalism. The Europeanization concept is applied in the research in order to analyze the domestic change by using the provided categories by Börzel & Risse (2000). Thus, the EU is the independent variable influencing the dependent variable which is the domestic change. Then, the discussion is underpinned by the concepts of HI such as critical junctures and path-dependency in order to explain the current institutional structure for regional development in Bulgaria. The Europeanization concept is used to investigate the changes in the institutional arrangements, including the establishment of the regional level and with the help of the HI the analysis define the role of this level.

METHODODOLOGY

In order to present a comprehensive research on the regional level of governance in Bulgaria as a result of the Europeanization, it is important to set the foundations by explaining the philosophical approach of the author towards the problem. For this reason, the ontology, epistemology and methodology of the research are delineated in this section. These three elements are seen as the parts of the paradigm which is defined as ‘basic belief system’ that directs the researcher in the interpretation of the research (Guba & Lincoln, 1994, p. 107). The ontology is belief about the nature of reality (how the world operates), the epistemology concerns the nature of knowledge that is acceptable by the researcher and it is inevitably related to the ontology, and, methodology refers to the strategy employed by the researcher for gaining knowledge (Saunders, Lewis, & Thornhill, 2009). These considerations on the study are very important because they are related and to some extent predetermine the results of it.

Taking into consideration the two main competing paradigms in social science – positivism and constructivism, I will point out that the former views the researcher as an external actor to the processes under investigation, which is not the case of this study (Bryman, 1984). On the contrary, the constructivist stance towards the ontology of this study is employed, meaning that the reality is viewed as socially constructed, thus the institutional framework for regional development in Bulgaria is a result of the interactions of social actors.
and the researcher is also part of this construction. Thus, the subjective view on the research problem implies that the Europeanization of the regional policy is a result of “the perceptions and consequent actions of social actors” and therefore it is a phenomenon under constant change (Saunders et al., 2009, p. 111).

Epistemologically, the research is steered by the interpretivist position because it seeks to understand the research problem rather than to explain it which is inherent in the positivist perspective (Bryman, 2012, p. 28). The interpretivism implies subjective perspective on the problem and views the researcher as linked to the problem. Here, the author is linked to the research topic first because she is Bulgarian, thus not indifferent to the regional policy of the country, and second, her professional and academic background is in the field of regional development and planning.

RESEARCH STRATEGY

The ontology and epistemology presented in the previous section provide the philosophical underpinnings of the research which are translated due to the methodology into specific steps and methods that steer the work of the author (Sarantakos, 2005). Thus, the discussed philosophical considerations are determining the methodology which is employed in the study in order to address the research question. Based on the purpose of the study, which is to understand the process of Europeanization in terms of the institutional framework for regional development in Bulgaria, it can be categorized as descriptive and at the same time exploratory research (Saunders et al., 2009). On the one hand, it is descriptive because it starts with depicting the historical events and processes that precede the current situation and, on the other hand, it is transformed into exploratory study analyzing the problems addressed in the research questions.

Reflecting on the research purpose, the study approach adopted is the one of the qualitative research which is usually “used in the exploration of meanings of social phenomena as experienced by individuals themselves, in their natural context” (Malterud, 2001, p. 483). Furthermore, as explained by Flyvbjerg (2006, p. 26) “Good social science is problem-driven and not methodology-driven” thus the choice of research strategy is justified by the problem under investigation itself. This is further supplemented by the statement that
“Qualitative research is an approach rather than a particular set of techniques and its appropriateness derives from the nature of the social phenomena to be explored” (Morgan & Smircich, 1980, p. 491). The qualitative research strategy, in contrast to the quantitative, is stressing the meaning of words rather than numbers in the data collection and interpretation, moreover, it reflects different epistemological and ontological positions (Bryman, 2012). This approach is usually employed in studies based on constructivist-interpretivist considerations, which is also the case of the current study, because it is deemed most suitable to interpret the world that is constructed by the social actors (Tuli, F., 2011).

**Research Design**

Following the discussion that has laid the epistemological and ontological foundations of this study together with the explanation of the rationale for choosing a qualitative research strategy, this section presents the employed research design. There are a number of different approaches used in the social science such as survey, case study, action research, grounded theory, ethnography (Saunders et al., 2009). In order to meet the research objective which is to analyze the institutional framework for regional development in Bulgaria with a focus on the regional level, a case study design is adopted. As defined by Yin (1994, p. 13) the case study is “an empirical inquiry that investigates a contemporary phenomenon within its real-life context, especially when the boundaries between phenomenon and context are not clearly evident”, which complies with the idea of the author to explore the Europeanization process of the regional policy framework in Bulgaria. Thus the case of this study is Bulgaria, where the phenomenon of the changes in the institutional framework for regional development in the context of the EU policy processes is examined but the boundaries between these two are blurred. The choice of design is justified also by the goal of the research to investigate in depth the features and particularities of this process in Bulgaria which is unique in every member state and thus to encompass the complexity of the phenomenon. The case study design is deemed appropriate because it emphasizes the importance of the context which is highly significant for the domestic changes in the institutional settings occurring as a result of the Europeanization because it predetermines to some extent this process. Thus, a “detailed and intensive analysis of a single case”, namely Bulgarian regional policy institutional framework, is carried out (Bryman, 2012, p. 66).
The paper is exploring the research problem through the single case study approach (Saunders et al., 2009). As already mentioned, the single case of this study is the institutional structure for regional development in Bulgaria in general. As Saunders et al. (2009, p. 146) explain, this approach is adopted when the study is focused on a “critical case or, alternatively, an extreme or unique case”. The case of Bulgaria can be seen as an extreme one in terms of the influence of the EU on the regional policy framework because it is considered one of the poorest states in the Union where all the six NUTS 2 regions are below the average GDP per capita (Eurostat, 2014). Another argumentation for the case study selection is that Bulgaria can be seen as a “typical case” that is “having similar characteristics to other cases of the same type” (May, 2011, p. 228) in the context of the Central and Eastern European countries which are usually analyzed as a distinct group with specific characteristics in terms of political history and development. More specifically, all CEE countries have shared the common characteristics of the centralized unitary states under the communist ideology before 1989, where there was no regionalization which is an important starting point for the analysis. A rationale for seeing Bulgaria as ‘exemplifying case’, as deliberated by Bryman (2012, p. 70), is because it “allows the researcher to examine key social processes” such as the institutional changes. Yet another reason, with practical considerations is that the author is Bulgarian which will allow easier access to information and will facilitate the data collection (e.g. in the interviews) which can otherwise be an important limitation for research carried out in Eastern European countries where there is often limited information available in English or accessible for foreign researchers.

**RESEARCH METHODS**

Research methods refer to the specific data collection and data analysis techniques and procedures that are used in the study to answer the research questions. Thus, the methodology section encompasses the overall scientific approach of investigating the research problem and all sub-sections of it are interrelated and have implications for the others. Therefore, the employed epistemological and ontological perspectives of the constructivist-interpretivist stance have consequences for the decision to adopt a qualitative single case study in the current research. As a consequence of the interpretivist position emphasizing the better understanding of the social phenomenon under study, data collection methods that are “sensitive to context” should be adopted (Tuli, F., 2011, p. 100). Additionally, the qualitative strategy in combination with case study design, according to Bryman (2012), is a typical form
of inquiry in which, usually, the qualitative interviewing is employed in order to gain deeper understanding of the problem through firsthand experience.

As follows, from the spectrum of data gathering techniques likely to be used in the qualitative research, such as observation, questionnaires, data analysis, using qualitative interviews were deemed most appropriate. In order to improve the validity of the study the triangulation approach is employed (Malterud, 2001). It suggests that two or more independent data collection techniques or data sources should be used in a research to confirm the results and thus make the research more reliable (Bryman, 2012, Saunders et al., 2009). For this reason, document analysis is also carried out which is further discussed. The two methods complement each other because they allow data collection from two different sources – formal (legislation, policy documents) and informal (respondents), and, this way achieve triangulation.

**Document Analysis**

In order to answer the research questions the study includes analysis of official policy documents and legal framework relevant to the research topic. The justification of the method derives from the objectives of the study to investigate the changes of the institutional arrangements in Bulgaria which inevitably requires analysis of the main normative regulations in the field of regional development. The selected laws are the Regional Development Act, the Administrative-territorial Division Act and the Constitution of Bulgaria because they lay down the formal regulations on the institutional structure for regional policy. A content analysis on the changes of these acts is provided in order to assess the degree of domestic change. Moreover, because the research investigates the Europeanization of the institutional structure for regional policy in Bulgaria, the study draws on documents from the European Commission part of the official communication between the two parties – Regular reports from the Commission on Bulgaria’s progress towards accession and the Comprehensive Monitoring Report (2005). The analysis of the reports is focused on the parts referring to the regional policy structure in Bulgaria in order to identify cause-and-effect relations between the reports and the changes of the laws. The documents employed from the Commission are mainly from the pre-accession period due to the fact that the EU requirements on the regional policy for the accession countries are very important and are deemed accomplished with the accession of the country. However, the changes in the Bulgarian legislation on the issue are
analyzed also in the period after the country became part of the EU. This analysis will allow drawing up conclusions based on formal institutions.

**QUALITATIVE INTERVIEWS**

In order to go beyond the formal institutions and to analyze the current situation and the practical conditions of the institutional arrangements and the role of the regions in Bulgaria, interviews are carried out as a second approach of data gathering. This is one of the most common qualitative data gathering techniques together with observation and archival information (Shah & Corley, 2006). The interview as a method is a purposeful conversation that aims to collect information from an interviewee in order to give better understanding of the phenomenon of interest (Kvale & Brinkmann, 2009). Deriving from the interpretivist-constructivist approach employed in the study the interviews are appropriate method that is “sensitive to context” (Tuli, F., 2011, p. 100) allowing to analyze the ‘constructions’ of the social actors by gathering their opinions and arguments.

The type of interviews selected for the study is that of semi-structured interviews. The approach allows the author to collect detailed information from the interviewees but at the same time it ensures a necessary degree of comparability between the results. The semi-structured interview is at the same time flexible enough to follow the direction in which the respondents answer but also to adjust the conversation and emphasize the focus of it (Bryman, 2012). The interviews carried out for the aims of the study were based on an interview guide (Annex 2) designed to be consistent with the research questions. The guide was developed in English and translated into Bulgarian afterwards because all interviews were carried out in Bulgarian in order to be conducive to the respondents.

The interview partners were identified through a snowballing technique, starting with the contacts of the author to identify key respondents with involvement or experience in the field of regional policy and development in Bulgaria based on her professional and academic background. Based on the snowball sampling the initial interviewees were asked to provide contacts of other people relevant to the study, who were then interviewed by the researcher (May, 2011). With regard to the issue under investigation the author has decided to interview people from different domains in order to avoid bias in the results. Particularly, if the selected interviewees represent only official institutions and administrations related to the regional policy, most probably they will present not their perceptions but those of the institution they belong to. Thus, people from the public administration, the academia and the business were
contacted in order to get the different perspectives. The snowball method was particularly useful to enable contacts with people from the public administration because they were initially contacted by e-mail but no reply was received.

All interviews were carried out face-to-face in May 2015. Serious problem faced by the author was the fact that in April and May 2015 there were a number of official holidays in Bulgaria. However, the author managed to carry out eleven interviews (Annex 1). All people contacted, representing the public administration, were purposefully chosen to be from all levels from one NUTS2 region. The particular region is not of importance because it serves to exemplify how the institutional system works in general in Bulgaria. Due to the snowball strategy this region turned out to be the North-Western region (Fig. 4). Thus, a representative from the public administration of each level, in relation to the regional policy, was interviewed – national, regional, district and local. The author aimed to gather comprehensive data and to improve the validity and reliability of the study by using this approach.

![North-West region of Bulgaria - one of the six NUTS2 regions in Bulgaria](image)

With regard to ethical considerations towards all participants in the study, an informed consent form was always provided before the start of the interview (Annex 3). In the beginning of the interview all necessary information for the research and the purpose of the interview was thoroughly explained to the participant. The voluntary nature of the interviews and the opportunity to withdraw at any stage were emphasized by the researcher. All
interviews with one exception were digitally recorded and then transcribed. Only three respondents preferred to stay anonymous and for this reason they are referred to as Interviewee 1, 2 and 3.

After being transcribed all interviews were analyzed according to the theoretical framework on the basis of the thematic analysis. The coding was carried out in Bulgarian in order to avoid losing information or misinterpreting the data. Only direct quotations were translated in English which were double-checked by a professional translator. Based on the content analysis of all interviews a number of codes were identified. They were all grouped into four themes that provide the basic structure of the empirical analysis.

**EUROPEANIZATION OF THE INSTITUTIONAL FRAMEWORK**

**HISTORICAL BACKGROUND**

This section is briefly outlining the prevailing institutional arrangements and inevitably related administrative division in Bulgaria in the political system before the pre-accession period has started. This is very important step, although it is not the focal point of the study, because it presents the rationale behind the ‘old’ communist system functioning in the country before 1989, emphasizing the difference between the centralized unitary state and the developed afterwards institutional structure. The delineation between these radically contrasting systems is necessary in order to better understand how significant the changes in the institutional settings are. Moreover, it provides essential foundation for the further analysis of the current institutional structure for regional development in Bulgaria.

Bulgaria, like most of the CEECs has experienced the communist regime for several decades (1944-1989) which resulted in a highly centralized government reflected in the administrative division of the country and its institutions. During this period the constitution of the country was changed twice, both strengthening the national level in terms of policy-making but at the same time “formally proclaimed the right of self-government for the local administrative units” (Yanakiev, 2010, p. 46). Following an administrative reform in 1959, the administrative-territorial structure of the country was established as consisting of two sub-national levels which still exist nowadays – namely districts and municipalities (Ganev & Primatarova, 2007). The districts represented regional level in the country without self-
The number of the districts has been changed to 28 which are still the same in the current administrative structure and generally their territory has remained (Fig. 5). However, this reform was performed during the communist regime and wasn’t aimed at real devolution of power or competences to the lower levels but it was rather convenient rhetoric in line with the decentralization tendencies in other countries. Thus the formulation of policies was still concentrated at the national level.

Figure 5 Districts of Peoples Republic of Bulgaria 1959 (Ganev & Primatarova, 2007)

The process of centralization was further deepened when in 1987 the 28 districts were merged into 9 regions (Monastiriotis, 2008) thus decreasing the horizontal units for easier control from the national level. Again, there were no real shifts in power between the three levels. On paper, this was act of shifting power towards the local level but actually it has strengthened even more the central government through the ‘thinning of vertical structures’ in the separate tiers of the administrative structures (Dimitrov, 1995, p.27). The local level “continued to have no other powers besides the implementation of the policies formulated by the communist party” (Yanakiev, 2010, p. 46). The intermediate level had no policy-making power but only coordination and straightforward implementation of the policies developed at the national level. This was the situation that was left as legacy when the following crisis in
the communist ideas and the economy in general resulted in the beginning of transition period towards market economy in 1989.

This brief section does not assess the impact of the processes occurring during the communist period as positive or negative rather aims to briefly depict the governmental structures that were inherited after the fall of this regime. It is important to emphasize that the steady and prolonged centralization of the government during the communist regime has been deeply embedded in the understanding and beliefs of the whole nation which still has impacts nowadays. The long shadow of the communist logic is still visible today which is further analyzed in the next chapters but it should be noted that this logic followed for decades cannot be changed in a day. Two years after the fall of the regime in 1991, the new Constitution of Bulgaria has proclaimed the local self-government, thus, giving impetus to the democratic changes in the country. In 1999 as part of the transition policies towards democracy the 28 districts (existing till 1987) were re-introduced and administrative decentralization towards this level was carried out.

**THE ‘MISFIT’**

As deliberated in the theoretical framework, in the adopted concept of Europeanization in terms of the domestic change, the point of departure is the ‘misfit’ between the European and the domestic practices and institutions. In order to define the misfit, it is important to clarify the context in which the accession negotiations of Bulgaria to become a member state of the EU have started. Bulgaria is part of the so called ‘Eastern enlargement’ of the EU during which in two phases (2004 and 2007) twelve CEECs have become full-fledged members. This enlargement was the largest expansion of the Union, and, more importantly, it was considering countries that due to historical reasons were less developed compared to the ‘old’ EU members, thus it was a big challenge to both the accession countries and the current (back then) MS. For this reason, the enlargement was marked by the sign of demanding conditionality, based on the Copenhagen criteria (from 1993) which set high economic and institutional requirements for the would-be members in order to fully comply with the *acquis communautaire* (Anastasakis & Bechev, 2003; Papadimitriou & Gateva, 2009). This way, the negotiation process between the EU and the accession countries in the case of the Eastern enlargement, and in particular in the case of Bulgaria, is presumed as process characterized by power asymmetries between the negotiating actors. Thus, the Europeanization here is understood as a top-down process, because Bulgaria was in situation of “only downloading
EU models and policy ideas” (Nikolova, 2007, p. 3) determined by its willingness to become a member of the EU.

In the name of accuracy, it is necessary to mention that along with the download perspective of the Europeanization process, also a horizontal dimension was evident through the implementation of Twinning projects, part of the PHARE programme available for the candidate countries. These projects were focused on the further refinement of the implementation of the EU legislation (EC, 2005a). In the field of the regional policies, Bulgaria was supported by Spain in the development of strategic documents (EC, 1999). In general, according to the Regular Report for Bulgaria (2005) 86 Twinning projects were carried out in the period 1998-2003 in various fields. However, no further information on influence from some particular member state for the development of the legislation and institutional structure for regional policy in Bulgaria was found. These projects were useful for the learning process and the capacity building concerning the implementation of Structural funds in the country in general. Thus, although the horizontal dimension of the Europeanization has also existed, we can argue that the institutional arrangements for regional policy are result of the download perspective of this process, which is elaborated in the following analysis.

Focusing on the download perspective of the Europeanization, the ‘misfit’ between the EU and the domestic institutional arrangements is depicted. The first Opinion on Bulgaria from the Commission discussing the readiness of the country for accession came out in 1997, two years after the country submitted its application to became a EU member (EC, 1997). It has identified a significant ‘misfit’ between Bulgaria and the EU level because in the section for regional policy and cohesion the country was assessed as generally having no regional policy, but rather separate regional initiatives that are “implemented within the framework of sectoral policies” (p. 93). One year after opening the accession negotiations in 2000, the negotiations on Chapter 21 of the acquis “Regional policy and co-ordination of structural instruments” have also started. This Chapter, characterized as one of the most difficult ones (Nikolova, 2007), contained all requirements concerning the regional policy, more specifically: development of legislative framework, establishment of territorial organization based on the NUTS classification for the implementation of Structural Funds, development of programming capacity, institutional and capacity building, as well as development of proper financial and budgetary management (EC, 2004a). All these requirements represented ‘misfits’ between the EU and Bulgaria which resulted in significant ‘adaptation pressure’.
This pressure, as already mentioned was not the only condition for domestic change (Börzel & Risse, 2000), but it was accompanied by the domestic actors and institutions’ response based on the country’s willingness and interest to join the EU. Therefore, a significant transformation in the legislative and institutional system regarding the regional policy in Bulgaria has occurred. However, Chapter 21 and the EU acquis in general, were quite scarce on how the specific requirements should be fulfilled. Thus the identified ‘misfit’ did not impose a specific model or polity structure to be adopted, rather this was left for Bulgaria to decide. This way, the ‘misfit’ concept doesn’t conflict with the ‘variety’ of political systems and state structures among the MS of the EU. However, with the specific requirements for the NUTS classification, in a way “the Commission is imposing a model” (Dehaene & Krok-Paszkowska, 2001, p. 121)

**LEGISLATION CHANGES AS A RESULT OF THE ‘ADAPTATIONAL PRESSURE’**

As a result of the ‘adaptational pressure’ coming from the EU a number of legislative changes were carried out in order to comply with the requirements. Moreover, the ‘harmonization’ of the domestic legislations with the European acquis, typical for every candidate member-state, was more than just harmonization in the case of Bulgaria. Namely, as already mentioned, according to the EC’ Opinion (EC, 1997), Bulgaria was lacking regional policy as such, therefore new legislation in the field of regional policy should be adopted in order to ensure the normative framework for these processes. Thus, as a result of the enhancement of the relations between Bulgaria and the EU and as a response to the adaptational pressure coming from the Union, a brand new Regional Development Act (RDA) was enforced in 1999.

The RDA from 1999 was the first effort to lay down the foundations of a regional policy in the country. The idea behind the following analysis of the changes of the legal framework for regional policy in Bulgaria aims to confirm the argument that it was developed and, afterwards, changed several times as a response to the EU requirements in this field. Even the draft of the first RDA in Bulgaria was “based on EC practices” according to the Opinion of the Commission (EC, 1997, p. 93). However, this law was based on the Constitution of Bulgaria from 1991, which have introduced the local self-government to the municipalities in line with the democratic transition, typical for all CEECs in this period (Ganev & Primatarova, 2007). The competencies for carrying out the regional policy have been still concentrated at the central level. According to the first Article of the new law, its aim was to “arrange the planning, the management and the resource ensuring of the regional
development” in Bulgaria (Art. 1). Moreover, the objectives of the law were defined as “to provide the prerequisites for sustainable and balances development of the regions in the country; to reduce the inter-regional disparities in terms of employment and income; and the implementation of the regional and cross-border cooperation and European integration.” (Art. 2). Thus, the law was explicitly stating that it is adopted to provide a legal framework for regional policy in Bulgaria that is consistent with the European requirements. Furthermore, it has provided the foundation for practical implementation of EU funded initiatives and programmes. This was ensured by the establishment of territorial units complying with the European NUTS classification. The RDA from 1999\(^1\) has introduced 6 regions in the country that were classified as NUTS2 level as well as areas for targeted support which were the most lagging areas in the country. However, the current NUTS division, together with the administrative-territorial division of the country and the corresponding plans and strategies for regional development are going to be explained in detail in the following sections. The RDA has also defined the institutional basis for the management of the regional policy with the main role of the Council of Ministers (namely the introduced Council for regional development) and the Ministry of regional development and public works (MRDPW). Another important element of the law was that it has established planning mechanisms for regional development – system of hierarchically subordinate regional development plans. The forth chapter of the RDA has specified that the projects and programmes included in these plans are funded by the state budget, the municipal budgets together with other international programmes and projects, envisaging generally the European funds.

More detailed analysis of the first RDA in Bulgaria is not necessary for the aims of this research. What is important to be stressed here is that the law has introduced an absolutely new approach for regional policy in the country based on plans and strategies as a result of the EU requirements. Moreover, it provided the legal basis for the implementation of projects and programmes funded by the European structural funds by defining the territorial levels in accordance with the NUTS classification as well as by establishing institutional bodies responsible for this policy.

However, as a first attempt to establish the legal framework for regional policy in Bulgaria, the law had limitations according to the EU requirements. This imposed further changes to the law in the following years. The change was underpinned by the critical

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\(^1\) In fact, the specific regions weren’t declared in the Act itself, but were presented in a separate document – Council of Ministers Decree No. 145.
assessment of the progress of Bulgaria in the field of regional policy stated in all Regular reports from the Commission from 2000 to 2003 (EC, 2000, 2001, 2002, 2003). They were stressing that further efforts are needed to establish appropriate administrative capacity to implement the Structural funds, appropriate system for financial management and control, also monitoring and evaluation bodies, proper statistical reporting including the regional level, as well as clarification of the competences and tasks of all institutions involved in the regional policy. In order to respond to the requirements of the EC, Bulgarian authorities have adopted new RDA in 2004. This was followed by the closure of the negotiations on Chapter 21 with the Commission (EC, 2004). This reaffirms that the changes in the Bulgarian regional policy legislation occurred as a result to the pressure of the EU.

Figure 6 Levels for Strategic planning

The new RDA has explicitly stated the aims and objectives of the regional policy in the country. Article 4 has defined the Regional Policy in Bulgaria as “system of normative regulative documents and tools, aimed at realization of the objectives of the regional development at the administrative-territorial units” (RDA, 2004, Art. 4). The law was
organized in seven chapters and it was significantly more detailed in comparison to the RDA from 1999. More clear system of strategic planning documents was presented in the new RDA, including four interrelated documents for different territorial units: National Regional Development Strategy, Regional Development Plans, District strategies and Municipal Development Plans (Fig. 6). According to the law, “Strategic planning of regional development shall comprise the development and updating of a system of documents for achieving sustainable integrated regional and local development”. This system was developed as a response to the EU requirements for regional development strategies. However, the planning documents are focused on the socioeconomic characteristics of the territories but are not related to the spatial planning. In relation to the comments of the Commission, Chapter Five was defining the competencies and task between the different bodies from different levels and how they interrelate. New collective advisory bodies were also established, as suggested by the Reports of the EC – Regional Development Councils (at NUTS2 level) and District Development Councils (at NUTS3 level). Moreover, the territorial organization was further refined, dividing the country in two NUTS1 regions, as well as, territorial centers were defined for the six NUTS2 regions which was important political decision. These six regions were defined as regions for planning of the regional development, thus, the national regional policy is decentralized in these territorial units. However, the NUTS2 regions don’t have administrative capacity, but only the aforementioned body for implementation of the state policy at regional level- the Regional Development Councils. The conclusion is that the regional policy remained to be governed by the national level.

Overall, Bulgaria has made a significant progress in developing appropriate legislative framework for regional development and, based on it, established the responsible institutions for regional development in the country with the RDA from 2004. This was evident in the positive comments by the Commission’s Regular report from 2004 (EC, 2004) and the closure of Chapter 21 in the end of 2004. Thus, officially the country was meeting the EU requirements in the field of regional policy. However, the Comprehensive report (EC, 2005) has concluded that further efforts in Bulgaria are needed in order to provide well-functioning structure for programming, monitoring and evaluation of the regional policy, i.e. to strengthen the administrative capacity, to ensure the quality of the produced strategic documents and to further regulate the regional development process through additional normative acts.

However, in 2006 – just months before Bulgaria joined the EU, the RDA was changed again (Fig. 7). The reason for this was the need for further clarification of certain parts of the
law according to the EU requirements, as well as, the need to comply with the requirement for the NUTS classification. Although Bulgaria has met this requirements in the RDA from 2004, due to demographic changes in the NUTS2 regions in Bulgaria some of them fell under the minimum threshold of population. The specific requirement is stated in Article 3 of Regulation (EC) 1059/2003, according to which the population of a NUTS2 region should not be below 800,000. Thus, some districts were shifted away from one NUTS2 region to another in order to meet the minimum requirements for population. This shift in the territorial areas of the NUTS2 level clearly indicates that these regions in Bulgaria doesn’t represent historically established regions with specific functional interrelation within their territory, but rather areas ‘created’ on paper to comply with EU requirements to adopt the NUTS classification. The issue is further emphasized in the following sections of the research. The RDA was changed again in 2008 introducing new territorial units of the MRDPW in the NUTS2 regions. Again – it was not an act of decentralization of competencies for the regional policy from the central level, but facilitating the coordination process.

**Figure 7 Changes in the territories of the NUTS2 regions in 2006 (borders are shown in black)**

The lack of specific conditions and guidelines from the Commission for establishment of institutional framework for the regional policy of Bulgaria (valid for all CEECs) can be defined as an obstacle for the Bulgarian authorities. Without having traditions in the field, they have faced the difficult task to create new framework and, for this reason, they were following the EU requirements as directly as possible, translating them straight into domestic legislation. This is evident in the establishment and the following changes in the RDA where all the requirements form the EC are followed. It is important to note here that in the beginning of the accession process the Commission was aiming at creating Europe of the
regions, i.e. establishing strong regional levels in Bulgaria, but over the process the focus was changed on strengthening the central levels to manage the structural funds (Nikolova, 2007). Thus the impetus for creation of strong regional level has abated because it was no longer required by the EU.

To sum up, the section answered the first two research sub-questions. For the short period of nine years, Bulgarian authorities have enforced the first RDA regulating the regional policy in the country, and have changed it twice in order to meet all requirements of the EU. Together with the RDA, a number of related laws were introduced or changed – Spatial Planning Act from 2001, Public Procurement Act from 2004, Spatial Planning Act from 2001, Municipal Budgets Act from 1998, Territorial-administrative division Act of Republic Bulgaria, Environmental Protection Act from 2002 and many others, as well as related secondary legislation. However, detailed analysis of these documents is not deemed relevant because, although, they have direct link to the regional policy in general, they do not refer to the institutional arrangements for this policy field. Only the Territorial-administrative division Act is referred in the following sections of the analysis.

CURRENT INSTITUTIONAL ARRANGEMENTS FOR REGIONAL POLICY

For the aims of the study it is important to examine the territorial levels at which the regional policy is implemented and the corresponding institutions. There are at present four territorial levels – national, regional, district and municipal, on the basis of which the strategic planning is carried out (Fig. 6). On the national level one of the most important institutions in terms of formulating and implementing the regional policy is the Council of Ministers. According to Article 16 from the RDA the Council has the overall responsibility for the regional policy because it adopts all strategic documents of the national and the regional level, approve the measures and means of implementation of activities in the areas for targeted support and adopts all regulations concerning the terms and deadlines for preparation and implementation of the strategic documents. Another important institution is the Ministry of Finance. It performs the functions of Certifying Authority and Body responsible for receiving funds from the ERDF, ESF and the Cohesion Fund in the programming period 2007-2013. Furthermore, a very important role in managing and implementing the regional policy on the central level is played by the MRDPW. According to Article 17 of the RDA, the Minister of regional development has number of competences including the organization of the elaboration of the National Strategy for Regional Development as well as the Regional
development plans, ensuring the coordination of the RP with other structural policies, to provide methodological instructions for the development and implementation of the documents. During the pre-accession period and at the beginning of the membership of the country in the EU, within the MRDPW new units and bodies were established, aimed at improvement of the planning and coordination of the RD following the EU requirements. One of them is the Chief Directorate “Strategic planning of the regional development and Administrative-territorial Division” where later, in 2002, a new department for programming and coordination was created (Minkova, 2004) which afterwards became a separate Chief Directorate. In December 2014, a Council for regional policy was established as an expert consulting body based on the partnership principle between the central government, the bodies responsible for local self-government and NGOs (MRDWP, 2014).

In vertical dimension, the second NUTS level is represented, as already mentioned, by 6 regions: Northwestern region, North Central region, Northeastern region, Southeastern region, Southwestern region and South-central region (Art. 4) (Fig. 8).

Figure 8 Regions from NUTS 2 level and districts (NUTS 3) in Bulgaria (MRDPW, 2015)
Important characteristic of the NUTS2 level is that it is not an administrative level in the country. The implementation of the regional policy on this territorial level is supported by six Regional Developments Councils (RDCs) in which representatives of all territorial levels are presented – one representative of each relevant Ministry, representatives of all districts in the particular region, representatives of the municipalities, as well as other stakeholders and NGOs. The RDCs are chaired by the district governors on a rotation principle over 6 months and the Deputy Chairman is a municipality mayor. The main competences of the Councils are discussion and adoption of strategic documents both on the regional and the district level and also coordination of the national Operational programme for regional development. However, the RDCs are not permanent bodies that are functioning in the region, therefore, the meetings are carried out periodically. In this line, in 2008 with the new RDA territorial units of the MRDPW were set up in each NUTS2 region in order to enhance the coordination of the regional policy among the different actors and also to facilitate the process of drafting strategic documents for the regional level.

The six regions consist of four or five districts which represent the NUTS3 level and according to the Territorial division Act of Bulgaria they are an administrative territorial unit. Currently, they are 28 districts in Bulgaria (Fig. 9). At the district level the central executive power is de-concentrated by law and, therefore, the district governors are directly appointed by the Council of Ministers. They have the general responsibility of implementing the regional policy decided on the central level and harmonizing the national and local interests.

![Figure 9 Districts of Bulgaria since 1999](image)
Each district consists of the territories of the municipalities in it, that are currently 265 and also represent an administrative units in Bulgaria. According to the Constitution of Bulgaria the municipality is the basic territorial unit in which the local self-government is carried out (Article 136). The mayor of the municipality is the executive authority within it and he is the body responsible for the implementation of the regional policy in place. Part of his competences is the organization of the elaboration of strategic documents for the municipality, also, he manages and controls all activities necessary for the implementation of those documents.

<table>
<thead>
<tr>
<th>Territorial Level</th>
<th>Responsible institution for the regional policy</th>
<th>Strategic document for regional development</th>
</tr>
</thead>
</table>
| National level          | • Council of Ministers  
                         • Ministry of Regional Development and Public Works  
                         • Ministries are competent for specific issues, e.g. Ministry of Transport, information technology and communications is competent on infrastructural issues | • National Development Plan;  
                         • National Strategic Reference Framework;  
                         • Operational Programs co-financed by the funds of the European Union;  
                         • National Strategy for Regional Development |
| Regional level – not administrative level | • Regional Development Councils  
                         • Territorial units of the MRDPW | • Regional development plans |
| Districts level         | • District governor  
                         • District Councils | • District development strategies |
| Local level - municipalities | • Mayor  
                         • Municipality Council | • Municipal development plans |

*Table 1 Territorial Levels and corresponding institutions for regional policy in Bulgaria*

*Source: Author’s own*
To conclude, the institutional arrangements for RP in Bulgaria are directly related to the administrative-territorial division of the country, supplemented by the regions of NUTS2 level (Table 1). From the discussion so far, it is evident that the most important levels in terms of RP are the national and the local level. The national level holds the main tools for the formulation and implementation of the RP, while, at the same time, the local level, as a representation of the self-government, also holds a strong voice. However, the general approach in the formulation of the regional policy in the country is top-down – starting with the national objectives and priorities stated in the strategic documents for the whole country (which are consistent with the EU priorities for the particular programming period), all documents for the hierarchically subordinate levels should comply with them. Thus, although the local level has the authority to define its place-based objectives and interest they should be consistent with the national ones.

However, the two intermediate levels (regions and districts) of government in Bulgaria should be examined in further details. As already stated, the regional level is not an administrative-territorial level in the country but it is the territorial basis for carrying out the RP. Thus, it has quite specific status because there is no administration on this level, nor budgeting on it. The RDCs are comprised of actors from the other levels, thus there are no representatives of the region’s interests. On the other hand, the district level is administrative-territorial unit with districts administration but it is “actually de-concentration of central government power rather than self-government” (Ganev, & Primatarova, 2006, p. 10). The districts governors therefore represent the executive power of the state in the district level and therefore their actions are expression of the national government in place. Thus, both levels are dominated by the central government by appointing the actors functioning on the regional and districts level, that are not directly elected by the citizens and therefore they promote the policies formulated on the national level. However, the point here is not to define the status of the intermediate levels as not appropriate, because as already mentioned in the EU there is a variety of political structures. Rather the author aims to emphasize that the changes in the institutional structure for regional policy in Bulgaria as a result of the Europeanization were envisaged to promote decentralization and regional self-governance, especially with the establishment of the NUTS2 (Nikolova, 2007; Yanakiev, 2010). However, this is not the case neither at the regions from NUTS2 level, nor the district level. Namely, for the first programming period, based on the official legislation in the field of RP in Bulgaria, the NUTS2 regions are nothing more than a statistical level for which a Regional Development
Plan is elaborated with the help of territorial unit of the MRDPW that coordinates the process. There is no authority or competences on formulating or decision-making in the field of RP on this territorial level. Moreover, the general institutional arrangements for the RP in Bulgaria can be defined as rather complex, with too many institutions sharing competences among four levels in the field of regional development. At the same time, the two sub-national levels have rather weak role in the formulation of the policy. The existence of the regional level can be justified only because of the EU requirements.

Based on the analysis in this chapter, we can conclude that according to the presented conceptual framework the domestic change in Bulgaria concerning the regional policy can be defined as ‘accommodation’ (Börzel & Risse 2000). A completely new legislative framework for RP was elaborated and a number of related laws have been changed. Furthermore, Bulgaria has developed completely new approach in the field of regional policy as a result of the relations of the country with the EU. However, the most significant change in terms of institutions was the introduction of the regional level which was embedded in the already existing structure of national, district and local level. The NUTS2 level was not defined as administrative level, nor was it entitled with administration. Thus, it started playing role for the regional policy in Bulgaria because it was defined as territorial basis for its implementation; however this role was left quite unclear during the programming period 2006-2013. Moreover, the institutional system for RD was artificially transformed to more complex one, having one more intermediate level without argumentation other than the compliance with the EU requirements. Thus, the changes in Bulgaria represent ‘adjustment’ of the domestic arrangements for regional development to the EU requirements. The following empirical analysis, based on elite interview aims to shed more light on the practical role of the regional level in Bulgaria, based on the perceptions of the people working in the field of regional development.
EMPIRICAL ANALYSIS OF THE INSTITUTIONAL FRAMEWORK FOR REGIONAL POLICY—RESULTS AND FINDINGS

This chapter aims to go deeper in the analysis of the institutional arrangements for RP in Bulgaria and the changes that took place based on interviews.

THEME 1: INFLUENCE OF THE EU ON THE INSTITUTIONAL AND ADMINISTRATIVE-TERRITORIAL STRUCTURE FOR REGIONAL POLICY

The influence of the EU on the institutional and administrative-territorial structure for regional policy in Bulgaria was a topic that was directly asked during the interviews. Most of the respondents (9 out of 11) have argued that the influence is quite significant. The arguments provided were focused on the changes that took place during the pre-accession period as well as after 2007. The respondents have emphasized that the EU was the reason for the development of the regional policy in the country as it is today:

“The influence was significant, it totally formulated the ways in which we implement the regional policy and the ways of planning and management of the regional development.” (Int. 3, 2015);

“…..after the accession of Bulgaria in the EU the term ‘regional development’ has begun to exist in the country...the regional development [as a policy field] has been established” (Todorova, 2015).

Although most of the respondents shared the opinion that the influence on the institutional structure for RP in Bulgaria has been significant it should be noted that the arguments provided were mainly emphasizing the introduction of the new RDA, together with the adjustment of other legislation in compliance with the EU acquis and based on that, the introduction of the NUTS classification in the country. However, as already stated in the previous chapter all these normative changes, though numerous, didn’t result in real transformation of the institutions.
One respondent shared that the influence was ‘medium’ (Tsekova, 2015) based on the fact that the main novelty was the introduction of NUTS levels. Two responses were rather negative, saying that the influence was weak:

“To be honest, [the influence is] weak. I see no difference. The only thing is, to say, the EU funds....” (Purvanov, 2015);

“In general, I believe that the EU did not influence the administrative-territorial structure for regional development at all, due to the only reason that Bulgaria joined the EU with this system and flatly refused to reform the administrative-territorial units and to adapt to the problems and policies of the EU. The only thing that Bulgaria did was to quickly prepare [the word used in Bulgarian in the interview for ‘prepare’ is in dialect and it is used with negative connotation by the respondent] the NUTS 2 regions.” (Stoichev, 2015)

Thus, the respondents sharing the opinion that there is no significant change are not contradictory to the others, they rather have different understanding of the word ‘change’ implying the real effects, not the normative alternations. The administrative-territorial structure for government of the country has stayed the same only ‘accommodating’ the regional level.

It has been mentioned by almost every interviewee that the territorial range of the NUTS2 regions has been changed twice in order to be consistent with Regulation 1059/2003 and more specifically the requirement for minimum population:

“One of the important changes that took place during the pre-accession period is the adjustment of the regions in Bulgaria in accordance with Regulation 1059, which was one of the main requirements to prepare the country for EU membership and then the territorial range of the regions from NUTS2 level was defined. However, these territories, defined in the pre-accession period, have subsequently, at the beginning of our membership, been changed, since some areas felt below the minimum threshold of population that is required by the Regulation and this underpinned the changes.” (Int. 1, 2015)

Thus, the changes represented the required minimum for Bulgaria in order to ‘accommodate’ the EU requirements in the existing institutions. No substantial changes, shifting competences towards the regions, took place, but only territorial changes. In order to answer the research questions it is important to analyze the explanation of this. Deriving from
the institutionalist perspective, we need to underline that “...pressures for change, whether
generated externally or internally, usually lead to the adaptation of existing institutions rather
than creation of new ones” (Bulmer & Burch, 2001, p. 81). Thus, incremental changes have
occurred more often than radical ones. In the case of Bulgaria this can be further justified by
the speed and the intensity of the accession process. The political actors were in difficult
situation to implement a number of legislative changes in short time in order to comply with
the requirements of the EU for regional policy that were disparate in comparison to the
existing separate initiatives for regional development based on sectoral policies in Bulgaria at
that time.

Moreover, the transformation of an institutional structure is directly dependent on the
political will in the country, and most commonly the political actors are not willing to launch
measures that will lead to shifts in powers/competences, especially in the case of centralized
unitary state as Bulgaria. This is explained by the ‘path-dependency’ concept, meaning that
the model of strong centralized policies where the national level has the main role tends to be
followed even after the accession of Bulgaria in the EU. All changes can be translated as
incremental in terms of institutional arrangements, even the introduction of completely new
legislation in the field of RP – the RDA, because they haven’t led to real transformation.
However, from the HI perspective these incremental changes accumulate and over time can
result in transformative change. Based on the analysis so far, we can say that the accession of
Bulgaria to the EU was a ‘critical moment’ when the opportunity for significant change in the
institutional structure for RP has arisen, though it was not realized and resulted in incremental
changes because this was the way to comply with the EU requirements with minimum efforts
and within the limited time period.

All in all, based on the interviews results the influence of the EU on the institutional
arrangements in terms of normative changes to comply with the requirements was significant,
however, it didn’t result in substantial transformation of the already existing structure. Thus,
the critical moments at the start of the pre-accession negotiations and the actual accession of
Bulgaria to the EU haven’t become ‘critical junctures’ completely reforming the existing
structure. The institutional arrangements for regional policy have witnessed a ‘path-
dependent’ change.
THEME 2: STRATEGIC PLANNING AS THE MAIN TOOL FOR REGIONAL POLICY

When speaking about the structure for regional policy in Bulgaria during the interviews there was a clear cleavage between the responses of the representatives of the public administration and those from the business and the academia domains. The former and especially the representatives of the district and the regional level have generally paraphrased the RDA explaining what the structure according to the legislation was and therefore, that it was appropriate. However, the members of the MRDPW have acknowledged some weaknesses in the current structure, saying that it is a bit ‘clumsy’ right now (Int.1, 2015). The general trend on this issue was that the structure for RP is not perfect, with the exception of the responses from the district and regional level that didn’t really express personal opinion beyond what was expected based on their professional occupation.

It is here necessary to explain that the direct question in the interviews concerning the structure for regional policy in Bulgaria was intentionally formulated to ask specifically for the strategic planning which is one of the main tools together with the programming for implementing the regional policy in the country. Specifically, the question was “How do you look upon the current structure of 4 levels of government – national, regional, district and municipal level- is it appropriate for the needs of the strategic planning in the regional policy in Bulgaria”. Most of the respondents acknowledged that the administrative structure for regional development had 3 levels:

“If we speak about the administrative system of the country – it is 3-level system – municipality, district and central, where the district level in practice is administrative regionalism – it doesn’t have functions of self-governance, it is deconcentrated central power over the territory of the country. Thus, we have 2 basic levels – municipal where there is self-government and central, which defines the regional policy.” (Stefanova, 2015)

However, as already explained in the previous chapter for the purpose of the strategic planning and the statistics, the regional NUTS2 level is part of the planning system of the country. This is another confirmation that the institutional structure for regional policy only ‘accommodated’ the EU requirements by introducing the regional NUTS2. However, this level has never become administrative unit in the country. It is relevant only for the strategic planning as already explained. The rationale behind that, based on the HI perspective can be found in the calculus approach. Adopting it, we can explain that the formal institutional
structure has persisted over time, only accommodating the NUTS2 level, even not as part of the administrative structure, because eventual radical change imposed from external actors (the EU) could potentially lead to worse situation for the individuals. For instance, by establishing new system that is not appropriate for the domestic context. Moreover, the decision on the introduction of the NUTS2 level and, at the same time, keeping the old structure as it was, is translated as maximization of the benefits (accession to the EU) with minimum efforts.

Another important thing that was not elaborated so far in the research and was mentioned by some of the interviewees is that, along with the strategic planning, the other main tool for RP in Bulgaria is the programming. According to the RDA, Article 8 the programming is the process of development of Operational Programmes based on the strategic documents, which programmes are funded mainly by the EU (in both programming periods 2007-2014 and 2014-2020 the EU funding of OP ‘Regional Development’ represents 85% of the total funding):

“In Bulgaria, the systems of strategic planning and programming are designed in a way so that they complement each other. With the means of strategic planning we prove needs ... and with the means of the OPs we give opportunity to the beneficiaries, when we can say that here we have the bottom-up approach, to generate particular projects.” (Int. 1, 2015)

However, the OPs are not developed by each NUTS2 region but there is only one common OP for regional development for the territory of the whole country. Thus, it turns out that the regions are the territorial basis only for strategic documents but not for programming. Stefanova (2015) shared that during the last programming period Bulgaria was one of the four countries in the EU without OP based on the regional level, together with Cyprus, Malta and Luxemburg with territories small enough to be covered by one programme. Her explanation is that ‘these are the fears of our politicians’ because a serious funding is needed in order to develop management bodies for the programmes as well as administration in each region.

Generally most of the respondents shared the opinion that the current structure for strategic planning is “complex” (Todorova, 2015), also that “the communication is lost in the middle of the scheme” (Todorov, 2015) meaning that the intermediate levels are not functioning properly. Some responses were even extreme saying that “practically only two levels existed – national and municipal, the others are just statistical levels” (Stoichev, 2015).
The coordination between the levels in term of regional policy was elaborated by most of the interviewees as based on the top-down approach. The representatives of the MRDPW have shared that during the pre-accession period the bottom-up approach was initially adopted. However, this resulted in a ‘long wish-list of projects’ (Int. 1, 2015) on national level that was supposed to provide the foundation for the National regional development strategy. Thus, based on this experience, after the accession of Bulgaria to the EU the approach is top-down represented in the hierarchically sub-ordinate strategic documents that should be all consistent with the national priorities and objectives for RP.

Here, we can acknowledge the power asymmetries emphasized by the HI, between the national, regional and local actors that are evident during the evolution of the institutions for RP. The communication during the accession process of Bulgaria with the EC was dominated by the national level. This, together with the historical reasons resulting in weak civil society and weak regional identity, explains why the opportunity to create strong regional level in the country was not exploited by the actors from all levels. The sub-national levels were not really given an access to the decision-making process on this issue. Thus, referring to Hall & Taylor (1996) the national level ‘won’ while the sub-national actors ‘lost’ in terms of architecting the structure for RP in the country. The examples provided from practice by the interviewees confirm that the sub-national level remains rather that is explained by the path-dependency and the power asymmetries in the process of evolution of the structure.

However, as mentioned by Int. 2 (2015) there is also a bottom-up approach in the current system of coordination between the different levels represented by the discussion involving either representatives of all levels as well as all relevant stakeholders during the elaboration process of the strategic document. On the contrary, several respondents and all of the business sector representatives have shared the opinion that ‘feedback from municipalities to national level is lacking’ (Todorova, 2015). Most of the interviewees have also stated examples of lack of communication or problem from their professional experiences. The two intermediate levels have elaborated that the coordination could be defined as good and that it was improved by the new RDA from 2008 introducing the territorial units of the MRDPW in all 6 planning regions.

The HI provides yet another explanation for the reasons based on which the current institutional arrangements were constructed - socioeconomic development and the diffusion of beliefs and ideas. In this regard, extremely important is to pay the necessary attention to the
socioeconomic situation of the country underpinning the institutional structure for RP. As stressed by some interviewees the budgeting of the different levels represents a serious problem. In general, the funding for regional policy under the OP ‘Regional development’ is 85% provided from the EU. Thus, the national co-financing rate is very low, therefore the country relies on external funding to carry out effective regional policy. This explains why the approach and the structure for this policy in Bulgaria are so consistent with the EU Cohesion policy. On the other hand, the municipalities have small budgets, as elaborated by Stefanova (2015) “From all 264 municipalities (back then) we have only 17, in 2013 – the last official data from the Ministry of Finance that is public, which, in their budget the own-sources revenues are above 50%, which is considered the critical threshold for real self-government”. Thus, we can hardly speak about real place-based regional policy based on the interests and needs of the municipalities because literally speaking they are not self-governing in terms of regional development, but complying with the national aims and objectives which, on the other hand, are dependent on the EU directions of development. The tendency is directly reflected also on the coordination between the levels. In the discussion we can deliberately skip the regional and the district level, because the former has no allocated budget and the later has small budgets for administration. Thus, as stated by many of the participants in the interviews the levels really functioning in terms of regional policy are the national and the municipal ones.

To sum up, the current structure of regional policy based on the data from the interviews is path-dependent, still maintaining the domination of the national level. This was also influenced by the power asymmetries in favor of the central government during the process of evolution of the institutions in regard to the accession to the EU. The socioeconomic factors, mainly the high reliance on external funding for regional policy, have further strengthened the process, making the national and the municipal level the only properly functioning levels in practice.

**Theme 3: The role of the regional NUTS2 level among the institutional and administrative-territorial structure**

All of the respondents with the exception of the representatives of the regional and district levels have shared the opinion that the role of the NUTS2 level in Bulgaria in the institutional
structure for regional policy is not significant. The interviewees from the MRDPW haven’t expressed positive or negative attitude towards the role of the NUTS levels. They have objectively elaborated that the NUTS2 level in Bulgaria “serves as a territorial unit for the statistics” as well as “it is a level in which a strategic planning is carried out” (Int.1, 2015). However, it was naturally expected that the representatives of the regional and the district levels would elaborate the role of the NUTS2 level according to the legislation supplementing what was stated above and listing the tasks of the Regional Development Councils and the territorial unit of the MRDPW.

The representatives from the academia as well as those from the business have shared quite extreme opinions on the issue:

“Actually, the regions for planning are not administrative-territorial units, there is no institutionalized regional self-government, and in practice, as of today, they have only the role of statistical units for the gathering of information for Eurostat.” (Stefanova, 2015)

“No role is the short answer” (Stoichev, 2015)

“As of today, the role is only statistical” (Todorov, 2015)

The results from the interviews have demonstrated that in practice the NUTS2 level doesn’t have a significant role in the institutional arrangements for regional policy in the country. Although there are Regional Development Councils, they do not have the influence on the policy making process and also they are comprised by representatives from all other levels. Together with the fact that the territorial units in each NUTS2 region are nothing more than projection of the central level on the territory, we can conclude that there is no regional authority. There is no institution or body elected by the citizens that represents the regional interests. It can be stated that those councils and regional bodies exist only because the NUTS2 level is envisaged by the RDA to be the territorial basis for strategic planning.

According to the question ‘Do you think that the role of the EU in regional policy has led to power shifts between the domestic levels of government?’ all interviewees have shared the opinion that the main influence was related to the diffusion of the ideas and priorities of the European politics of decentralization and aims towards real democracy and greater citizen participation in the policy-making. Some of the interviewees, mainly from the academia and the business, elaborated that in practice, there were no real shifts in power and competences
between the domestic levels. As already explained the EU has never imposed directly
decentralization or regional level of self-governance and this is evident by the variety of
institutional and administrative structures among all member states. However, in Bulgaria, as
mentioned by some interviewees, the accession to the EU has indirectly influenced the
changes in the institutional structure, first, with the dissemination of ideas as decentralization
and closer involvement of the citizens to the policy-making, as well as, with the aim to
develop strong multi-level structure. The later tendency, however, has changed over the pre-
accession period and was redirected towards the establishment of strong central level to be
able to implement the structural funds. Stefanova (2015) has stressed that a Decentralization
Strategy “was one of the requirements for our accession to the EU”. As stated in the
introduction of the Strategy itself it is developed in line with the recommendations of the
Commission stated in the Comprehensive report (2005). However, in the strategy, expiring
this year, the NUTS2 regions were not considered. Only the local and district levels are
referred to.

The issue of the representation of the Bulgarian regions was also referred to during the
interviews. All respondents explained that according to the normative framework the national
level is the one expressing the interest of the whole country and thus influencing the
formulation and decision-making in the EC. Most of the interviewees, with the exception of
the two intermediate levels, has elaborated that it is better that the national level defends the
interests of all regions on the European arena, based on the current institutional structure and
the administrative capacities responsible for regional policy in the country. An interesting fact
was discussed by one of the representatives of the MRDPW:

“There is a paradox about Bulgaria, that in the Committee of the Regions are participating
representatives of the local authorities of Bulgaria, which are not regional authorities
according to the common logic of the EU, and this is due to the fact that there are no direct
elections on the regional level” (Int 2, 2015).

As argued by the HI the ‘history matters’ in the case of Bulgaria. The established
formal and informal institutions are difficult to be changed in a day. The informal institution
of strong centralization of policies and the belief that the ‘state’ should take care of everything
is evident in the current polity structure. The ‘weak’ role of the NUTS 2 regions is indicating
the strong resistance of the formal institutions for changes. Furthermore, as already
mentioned, there is a lack of political will to implement changes towards real decentralization
and “we found an excuse with the crisis from 2008” to work in this direction (Stefanova, 2015). The socioeconomic factor of lack of financial resources in the country is another very significant obstacle of this process.

**Theme 4: Necessary Change in the Institutional Structure for Regional Policy?**

According to the empirical data, the said so far suggests that the current institutional structure for regional policy in Bulgaria has its own strengths and weaknesses. One of the strengths is that the structure provides ‘some form of subordination between the national and the sub-national levels’ and, also, it “maintains the unity of Bulgaria as administrative and political integrity” (Stoichev, 2015). Most of the respondents have underlined that during the period from the start of the pre-accession negotiation till today, a significant progress in terms of administrative capacity and quality of documents and projects is obvious:

“One of the strengths is that already a second cycle we develop strategic documents for regional development and to a great extent there is a serious progress in the quality of those strategic documents, therefore, of the basis on which we plan and manage the regional development” (Int. 3, 2015)

“There is a tangible progress over the last years.” (Todorova, 2015)

Thus, the process of evolution of the institutional structure in Bulgaria is evident and signs for this are all incremental changes that in the end have resulted in positive outputs as development of qualified administrative capacity, learning process and production of quality documents. However, weaknesses as already discussed in the previous themes, were also addressed by the respondents. With exception of the representatives of the two intermediate levels only, all respondents acknowledged, in one way or another, that there is some problem in between the national and the local levels. As elaborated by Int.1 (2015) “Implementation of policy is a process, i.e. you can always look for improvement of this process on the basis of what you’ve done so far and you found out does not work efficiently enough…”. In this line, there is the necessary precondition for an eventual change – the existence of a problematic area in the institutional structure, thus the accumulation of incremental changes over time can
result in a transformative change. But what form could this eventual transformative change take?

The respondents, based on their opinion and argumentations have elaborated three potential scenarios:

1) Institutional reform towards regional self-government in the 6 regions - NUTS2 level;
2) Institutional reform towards regional self-government in the 28 districts - NUTS3 level;
3) Complete change in the existing institutional and administrative territorial structure in Bulgaria.

All interviewees have defended to a different extent these options while some of them didn’t express opinion on the matter, namely the representative of the NUTS2 level. The district governor that was interviewed shared the opinion that: “The introduction of regional self-government is not a formal requirement and therefore its absence is not an obstacle in the process of European integration, however it limits the effectiveness of the regional development policy.”

Based on the analysis on the formal documents, as well as on the interviews that were carried out for this research, the author argues that the reform towards regional self-government is probably the optimal option. There are several arguments for this statement. First, the territories of the NUTS2 regions will allow the effective strategic planning because they are big enough, including 4-5 districts with different natural and socio-economic characteristics. Thus, the disparities within these regions can be balanced better in terms of regional policy and elaboration of integrated strategies for regional development. This will result in more sensitive approach towards the regions’ specific characteristics and problems. Second, this will facilitate the administration because at the current state “one NUTS2 region is comprised of 4 or 5 districts which have common and specialized administration” and if there is administration and self-government at NUTS2 level “there will be only one common administration” for all included districts (Int.1, 2015). Moreover, this may provide better wages and therefore better motivation for the people working in the administration, which therefore, affects the quality of work. Third, self-government on NUTS2 level would hamper eventual risk of ethnic conflicts because some districts in Bulgaria have prevailing minority population (Stefanova, 2015).
The argumentation provided simultaneously presents the points for self-government on NUTS2 level and against self-government on district level. The third scenario is not elaborated because it requires radical changes over the whole institutional structure, thus it is not deemed possible in near future. However, as mentioned by most of the interviewees the reforms are a question of ‘political will’. Stefanova (2015) has shared that “5-6 years ago the parties in their pre-election platforms had touched upon the issue of decentralization in one way or another…but they become silent lately…no one has carried out particular measures”. Thus, the political asymmetries in the process of evolution of the institutional framework for regional development are very influential. The political actors in the country, representing the central government are not willing so far to make changes in the direction of devolution of powers to the lower levels. The local level as elaborated by the Mayor of Chiprovci has also issues with the domination of the central level, because as he shared, the local self-government in the country is not in its full sense “a self-government” because most of the municipalities are dependent on the national budget. Potential re-shifting of the competences between the different levels will thus allow more balanced structure in terms of power and influence of one level over the others.

CONCLUSION

The research has attempted to investigate the Europeanization of the institutional arrangements for regional policy in Bulgaria, and, based on that, to define the role of the NUTS2 level. Bulgaria is an interesting case study for the research because it joined the EU as part of the so called ‘Eastern enlargement’ that was marked by a number of characteristic features. Under demanding conditionality and evident power asymmetries during the pre-accession negotiation process, Bulgaria has accessed the EU in 2007 after a long period of difficult adjustments and harmonization with the EU requirements as set in the acquis communautaire. The study aimed to make a contribution to the literature of the Europeanization by analyzing the institutional situation in Bulgaria, as one of the CEECs, one programming period after its accession.

The study employed two basic approaches in the investigation – analysis of official documents and legislation, and empirical analysis based on interviews with key informants working or directly related to the institutional structures for regional policy in Bulgaria. The idea of the author behind that was to be able to differentiate between the formal and informal
institutions influencing the evolution of the arrangements for regional policy, as well as, to be able to conclude what is the state of the actual functioning structure in practice. Based on the analysis of official documents the research has concluded that a brand new legislation was elaborated in the field of regional policy in Bulgaria, changing the old sectoral initiatives with indicative approach towards the planning and management of the regional development and the territory. The legislation provided the legal basis for the implementation of the Structural funds in Bulgaria and has introduced the NUTS classification to the country. The RDA and a number of other related documents were changed several times in order to comply with the EU requirements. Although the process of negotiations with the EC was long and filled with number of novelties in terms of normative regulations, it did not cause a substantial change in the institutional arrangements in the country. The Bulgarian institutions ‘accommodated’ all requirements of the EU, such as the NUTS2 level and other institutional bodies that were established for the implementation and coordination of the regional policy, without greatly transforming themselves. Serious changes in the institutional structure didn’t occur after 2007. Thus, the main driving force behind the changes was the EU and, more precisely, the accession to the EU. The established NUTS2 level is one of the levels for which strategic documents for regional development are elaborated. Moreover, on this level a territorial unit of the MRDPW and a Regional Development Council are functioning.

The empirical analysis of the interviews has further elaborated the discussion on the institutional structure in Bulgaria. According to the results and based on the historical institutionalist perspective the author concluded that the changes in the institutional structure for regional policy are path-dependent and marked by power asymmetries dominated by the central government. The interviews contributed to the analysis showing that the levels of real relevance to the regional policy in Bulgaria in practice are the national and the local. The two intermediate levels – the NUTS2 and the district level are practically directed by the national government policies in the field. The ‘critical moment’ of the accession of Bulgaria to the EU didn’t result in substantial transformation. That is further underpinned, as presented in the empirical analysis, by socioeconomic factors such as the low or not existing budget for regional policy on sub-national levels and the general reliance of the country on external funding for carrying out the regional policy.

To conclude, according to the main question ‘What are the effects of the Europeanization process on the institutional framework for regional policy in Bulgaria and what are its current challenges and opportunities?’, the study has shown that there were a number of changes that Europeanized the institutional arrangements in the country, however,
they did not present a substantial change in the distribution of competences among the
different levels. The findings demonstrate that after the accession of the country to the EU in
2007 almost any changes have taken place towards empowering the regional or the district
level in relation to the implementation of the regional policy. Connecting back to the wider
theoretical debate, compared with the previous studies on the topic, the findings are similar
and show that even after the first programming period there is no substantial change. This
means that either political impetus or strong societal pressure and involvement for further
change is lacking in the country. The analysis of the formal legislation has shown that there is
a working institutional system on paper, but according to the interview insight in practice only
two levels really can influence the regional policy. The employment of the Europeanization
and the historical institutionalism concepts have enhanced the analysis, however, they didn’t
provide analytical tools to reflect all factors influencing the institutional structure. Namely,
the historical institutionalism acknowledges the effects of ‘other socioeconomic factors’ but
doesn’t provide an explanation of how they influence the evolution of institutions over time.
In the case of Bulgaria, such factors are found to be the low national budgets for regional
policy and the demographic situation, including the ethnic distribution over the territory of the
country. Thus, the study touched upon these factors but failed to reveal the extent of their
importance which seems to be significant. Another limitation of the study is that it doesn’t
account factors such as corruption and personal influence that have a strong impact on the
institutional structure in Bulgaria but are difficult for examination. All aforementioned
limitations could represent interesting areas for future research.

The study should also acknowledge some practical limitations. The topic has
encompassed various aspects that were difficult to be grasped in the time limits of the
research. In order to present more comprehensive conclusions that can be generalized with
certainty the study needed a larger sample that was not possible to be realized in the period in
which the research was carried out. Moreover, the institutional arrangements turn out to be a
difficult topic for an open discussion with people representing this structure itself. In this
regard, the interviewees representing the business domain and the academia provided much
more useful insight on the topic. Looking back at the research process, the author
acknowledges that it could have been useful to pay more attention to the socioeconomic
factors in the analysis. Furthermore, the findings could have benefitted from interviews with
external actors, i.e. people working in the EC or any other European institution, providing
different perspective on the issue under investigation.
Based on the identified weaknesses and limitations in the institutional structure in terms of appropriate functioning of the regional policy, the study suggests recommendations for the policy-makers in Bulgaria. As elaborated by the interviewees, further refinement of the institutional structure can be carried out. Although aware of the constraints for such a reform, such as financial resources, Constitutional changes and most of all political will, the author suggests that some form of decentralization towards the NUTS2 level or the district level is necessary. The argumentation presented in the study favors the former option. Such a reform would facilitate the implementation and coordination of the regional policy in Bulgaria which most probably will result in more efficient regional development. A regional level (either NUTS2 or district) should be given competences in regional policy in order to better defend the regional interest and to fulfill the regional policy with a real regional ‘content’.
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**ANNEX 1 – TABLE OF INTERVIEWS**

<table>
<thead>
<tr>
<th>Interviewee</th>
<th>Code</th>
<th>Date</th>
<th>Organization</th>
</tr>
</thead>
<tbody>
<tr>
<td>Elena Todorova</td>
<td>Todorova</td>
<td>06.05.2015</td>
<td>Private consultancy company in the field of regional development</td>
</tr>
<tr>
<td>Michaela Tsekova</td>
<td>Tsekova</td>
<td>05.05.2015</td>
<td>Private consultancy company in the field of regional development</td>
</tr>
<tr>
<td>Leonid Todorov</td>
<td>Todorov</td>
<td>06.05.2015</td>
<td>Private consultancy company in the field of regional development</td>
</tr>
<tr>
<td>Interviewee 1</td>
<td>Int. 1</td>
<td>04.05.2015</td>
<td>Ministry of Regional Development and Public Works</td>
</tr>
<tr>
<td>Interviewee 2</td>
<td>Int.2</td>
<td>04.05.2015</td>
<td>Ministry of Regional Development and Public Works</td>
</tr>
<tr>
<td>Ivailo Petrov</td>
<td>Petrov</td>
<td>15.05.2015</td>
<td>District Governor of Montana District – NUTS3</td>
</tr>
<tr>
<td>Irina Mihailova</td>
<td>Mihailova</td>
<td>15.05.2015</td>
<td>Head of Department “Strategic planning and coordination of regional development in North-West region” – NUTS2</td>
</tr>
<tr>
<td>Anatoli Purvanov</td>
<td>Purvanov</td>
<td>16.05.2015</td>
<td>Mayor of Chiprovci Municipality</td>
</tr>
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<td>Interviewee 3</td>
<td>Int. 3</td>
<td>05.05.2015</td>
<td>Sofia University St. Kliment Ohridski</td>
</tr>
<tr>
<td>Kosio Stoichev</td>
<td>Stoichev</td>
<td>08.05.2015</td>
<td>Sofia University St. Kliment Ohridski</td>
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<tr>
<td>Milena Stefanova</td>
<td>Stefanova</td>
<td>08.05.2015</td>
<td>Sofia University St. Kliment Ohridski</td>
</tr>
</tbody>
</table>
Interview guide

Date:
Approximate duration of the interview:
Organization:
Name/Code of participant:

Before the interview:
- Check the background of the organization and adjust the questions towards the interview partner;
- Brief introduction of the topic and answering any questions that the participant might have before starting the interview;
- Ask the partner to sign the Consent Form and ask for permission to record the interview.

General questions:
1. Could you tell me something about yourself? What is your current occupation?
2. What is your professional and academic background and what is your relation to the regional policy in Bulgaria?

Topic 1: Impact of the EU on the institutional framework in Bulgaria
3. Could you explain in what way the EU had impact on the establishment of the changes of the institutional system and administrative structure for regional development in Bulgaria (in the pre-accession period and afterwards)? How would you define it — strong/medium/weak?
4. In your opinion, what are the most significant changes in the institutional structure, the legislation, processes, practices, etc. for regional policy in Bulgaria in relation to the accession of the country in the EU?

Topic 2: Levels of government and the establishment of regional level of government (NUTS 2 level)

Europeanization of Regional Policy In Bulgaria – The Establishment of a Regional Level of Governance
1. How do you look upon the current structure of 4 levels of government – national, regional, district and municipal (local) level? Is it appropriate for the needs of the strategic planning in the regional policy in Bulgaria? Why?
2. How is coordination achieved between the different levels? What are, in your opinion, the shortcomings or barriers that are seen?
3. In your personal experience, have you encountered lack of coordination between the different levels, or a lack of clarity among actors about which level is competent for a certain issue?
4. How do you look upon the existing division of competences between the four levels? Would you give/take power to/from particular level and what is the argumentation for this?
5. Do you think that the role of the EU in the regional policy has led (or should lead) to power shifts between the domestic levels of government?
6. What is the role of the regional level (NUTS 2) in the institutional structure for regional policy in Bulgaria?
7. The Bulgarian Ministry of regional development is involved in policy and decision-making processes of the EU through the Council. In your experience, how can sub-national levels of government in Bulgaria influence EU policy frameworks for regional policy, or should or could they be given a stronger role in these EU processes?

Topic 3: Future developments of the institutional framework for regional development in Bulgaria and recommendations

8. In your opinion, what are the strengths and weaknesses in the current institutional structure for regional policy?
9. Would there, in your opinion and experience, be any changes to the current institutional structure desirable to ensure a more efficient or effective implementation of regional policy?
10. Do you have any recommendations, suggestions or comments related to the topic that were not covered by the questions in the interview?

After the interview:

- Ask for contacts of other people that might be useful for the purpose of the study.

*Europeanisation of Regional Policy in Bulgaria – The Establishment of a Regional Level of Governance*
Consent Form

Title of the master thesis:
"Europeanization of regional policy in Bulgaria – the establishment of a regional level of governance"

I understand and voluntarily agree to participate in a research conducted by Ana Dimitrova (student) which analyses the institutional structure for regional development in Bulgaria, established as a result of the accession of the country to the EU, with focus on the regional level (NUTS2). I understand and voluntarily agree to participate in a research interview the purpose of which is to explore the perceptions of actors with involvement or experience in the institutional system for regional development in Bulgaria, in order to allow analysis beyond the formal legislation and assessment of the real situation of the issue under investigation to be carried out.

I understand and voluntarily agree that the information gathered will be described and analyzed by the student and published on the websites of two universities (Radboud University and Blekinge Institute of Technology) through the master thesis of the student, and in subsequent publications.

I grant permission/ I don’t grant permission for the interview to be recorded.

I grant permission my name to be cited in the master thesis. / I prefer to be anonymous.

I understand that the interview is completely voluntary and I can choose to withdraw at any stage of the interview without giving explanation.

Name and signature of the student: __________________________

Name and signature of the participant: __________________________

__________________________  __________________________
(date)  (Place)

Europeanization of Regional Policy In Bulgaria – The Establishment of a Regional Level of Governance