

**REPLY TO EUROPEAN COMMISSION COMMENTS ON A DRAFT
FOOD AND BASIC MATERIAL SUPPORT PROGRAMME
2021-2027**

EC COMMENT	MA OPINION	EC COMMENTS - 22.03.2021	MA OPINION
GENERAL OBSERVATIONS			
<p>In the first part, in addition to the comprehensive analysis of the main development challenges and policy responses in Bulgaria, it could be included also the rural/urban context.</p>	<p>Comment accepted. The analysis of the main development challenges and policy responses in section 1 of the programme template will be complemented with the following information: The results of the Structured Survey of the final recipients under the programme for the period 2014-2020 show that more than a half (53%) of the assisted people with hot lunch live in smaller towns. Approximately equal shares of service users are residents of regional cities (23%) and villages (20%). An insignificant share (3%) of the beneficiaries live in the capital. In respect to people receiving food packages the most numerous is the group living in small towns – 42 %. The next group are the people living in regional towns – 41% of all beneficiaries of the assistance. 11% live in villages and 7 % live in the</p>	<p>It will be relevant to update all the reference figures from Eurostat or national statistics with the newest data available before the Programme submission.</p> <p>In the text of the Programme (section 1: strategy), please add a commitment to continue the implementation in line with the same territorial approach in line with the actual needs, also covering small cities and villages.</p> <p>Please also add reference to the poverty line as general additional reference for support, in addition to the national rules for social support.</p> <p>To avoid frequent future amendments, please add in the strategy section that in case the national regulation is amended in terms of coverage and adequacy of the provided support, these changes will be also considered for the definition of the target groups for support.</p>	<p>Comment accepted In the text of the Programme (Section 1: Strategy), all statistics will be updated in line with 2019 statistics from the annual survey "Statistics on Income and Living Conditions (EU-SILC)" published on the NSI website and the latest information available from Eurostat.</p> <p>The Food and Basic Material Assistance Programme 2021-2027 will continue to be implemented throughout the country, in line with the territorial approach applied so far, also covering small cities and villages.</p> <p>Recommendations for additional texts are included in the Strategy section. The reference to the poverty line and the flexibility to ensure compliance with national legislation, if necessary, are foreseen for each type of assistance in the programme.</p>

	capital.		
<p>The Commission welcomes the approach that the OP could be seen as an entry point towards more comprehensive social inclusion measures for the most vulnerable people. To achieve this, it is important to develop as much as possible links through the accompanying measures with other EU programmes and mainstream national policies in order to move beyond emergency help and aim at real social inclusion. Therefore, we encourage the reinforcement of a larger range of accompanying measures as well as the individual assessment and follow-up approach when an end-recipient has been guided to the most relevant social services provided locally under the ESF plus</p>	<p>Comment accepted. The following information is added in section 1 of the programme template: The accompanying measures provided under the programme will be individually oriented to the needs of the covered persons and groups and will be the mechanism through which the assisted will be directed to concrete and complex social inclusion measures. A database with information for the assisted persons under the programme will be set up, including information for their specific social profile and the profile of their family members. As a result, the final beneficiaries will receive information and will be directed to specific measures and projects implemented with the support of the ESF + or under other programmes. The information on the results achieved for each targeted person will be reported back to the Managing Authority through a coordinated mechanism. This approach</p>	OK	

	<p>will be applied to all types of support implemented under the programme and will be an important starting point for coordination and planning of future measures to improve the quality of life of those most in need.</p> <p>In addition, an external evaluation of the effectiveness, efficiency and impact of the support provided will be carried out during the implementation of the programme, which will also assess the contribution of the measures implemented in changing the status of the target groups.</p>		
<p>We note that in the programme there is no explicit mentioning of the links and relations with the measures under the RRP/RRF. Therefore, please further elaborate how the coordination and demarcation of the type of support will be ensured.</p>	<p>Comment accepted The following information is added in section 1 of the template:</p> <p>The main goal of the Recovery and Resilience Plan of the Republic of Bulgaria (version of October 2020) is to help repair the economic and social damage caused by the coronavirus pandemic. In pursuit of this goal, the Government has grouped a set of measures and reforms that with a special focus on disadvantaged people and individuals in</p>	<p>Perhaps, instead of the part in yellow it is better to indicate that: <i>Through a coordinated mechanism the programme will contribute to the identification, targeting and follow-up of the people in need who have been referred to the most relevant social support measures provided under the ESF plus or RRF/RRP.</i></p>	<p>Comment accepted. That text has been replaced.</p>

	<p>order to achieve more inclusive and sustainable growth. Within the framework of the activities set in the Plan for Recovery and Resilience in terms of social inclusion, the programme will contribute to the identification and targeting of the needy persons to the projects that are being implemented. Depending on their individual needs, people will be targeted to activities contributing to overcoming poverty, reducing social inequalities and active social inclusion, identified as priorities in the Plan. Thus, in addition to the provision of basic support - with food and material assistance, the programme will contribute to more sustainable poverty alleviation for a large group of people in need through comprehensive and targeted measures.</p>		
		<p>Please review the structure of table “Таблица 1 Т: Структура на програмата*” with the final indication of priorities and reference to SO.</p>	<p>Comment accepted The structure of 'Table 1 T: Programme Structure is consistent with the latest version set out in Annex V Template for programmes supported from ERDF (Investment for Growth and Jobs Objective, ESF+, SFP, Cohesion Fund and EMFF). The full text of the programme is set out in the latest updated version of Annex V.</p>
		<p>For a better analysis of the ambition of the</p>	<p>Comment accepted</p>

		<p>programme, it is requested that the authorities provide some estimation on the split of the amount in the programme foreseen for the different types of support.</p>	<p>In view of the compulsory fields to be filled in Annex V Template for programmes supported from the ERDF (Investment for growth and jobs objective, ESF+, CSF, Cohesion Fund and EMFF with regard to programmes under specific objective (xi) "Addressing material deprivation", information on the allocation of financial resources in the programme by type of support is presented in a separate document.</p>
<p>The draft OP is missing reference values for the common and programme-specific result indicators as requested by (draft) ESF+ regulation art 21(2): <i>‘The reference values for common and programme-specific result indicators shall be established.’</i> In particular, for specific objective xi, cumulative milestones, target values and baselines are not required, only reference values which may be used to assess performance. They should be based on historical achievements deemed relevant as comparison. It is expected that MS shall set reference values for those result indicators which represents the focus of the specific objective xi. In your case as the support is described as general food aid to most deprived without specifying target group, then</p>	<p>Comment accepted A query for additional guidance was sent to ESF+ Data Support Centre. Once the requested clarifications are received, the information will be provided in the programme.</p>	<p>We will be grateful to receive an overall table with the estimated indicators and underlining methodological document for the milestones and targets for each type of intervention.</p>	<p>Comment accepted In accordance with the instructions received from the EC Data Support Centre (DSC), reference values have been set for the result indicators MCR01 <i>Number of the end recipients receiving food support</i> and MCR10 <i>Number of end recipients receiving material support</i>. The reference values are based on previous similar interventions under the Operational Programme for Food and Basic Material Support.</p>

<p>you should set the reference value for the following result indicator ‘<i>Number of the end recipients receiving food support</i>’. However, in case you need additional guidance on the development of the reference values of the indicators, you could contact the Data Support Centre (DSC). More particularly, the DSC can comment on:</p> <ul style="list-style-type: none"> - the indicators proposed for a 2021-2027 ESF+ shared management programmes under negotiation; - the targets or reference values proposed by the MS. <p>The Data Support Centre can be reached at e-mail: support@esfsupport.eu as well as by telephone at: +32 2 313 99 42 (from 9:00 to 18:00 CET).</p>			
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Observations by Type of intervention Food and hygienic packages			
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<p>We welcome your approach that the food packages will include basic products for preparation of meals for the whole family. The national authorities are advised however to describe the mechanism which will</p>	<p>Comment accepted In Ordinance of the Minister of Labor and Social Policy for defining the main target groups for the respective type of support, a mechanism for determining the quantity of food and hygiene materials in</p>	<p>The choice of the intervention for each type of support should not only refer to the “experience from the past” and satisfaction of the public, but be primarily based on the analysis done. For example, on packages the starting reference should be that with those some of the primarily basic material needs will be covered as they will target</p>	<p>Comment accepted The text in section 2.1.2 regarding type of aid: Food and hygiene packages has been updated in line with the proposed remarks.</p>
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<p>determine the quantity of food in the package especially when families/households with more members benefit from it.</p>	<p>the packages will be set up based on the number of family or household members to benefit from it. The mechanism will be coordinated with all relevant stakeholders. Thus, a greater flexibility in providing assistance in accordance with the relevant social and economic situation in the country will be ensured.</p> <p>The explicit indication of types and quantities in the programme will limit the possibilities for response and timely addressing the specific problems that may arise in the seven-year period of implementation of the programme.</p>	<p>especially people in severe material deprivation situation... and then expose the rest of the arguments.</p> <p>The main reference criteria to be included in the Ministerial Ordinance should be present in the Programme text, both in terms of eligibility criteria as well as the content of the support provided. In all cases the text can make reference to a text such <i>“at minimum XXX and YYY groups of recipients will be covered”</i> or <i>“the products ZZZ or RRRR will be included in all cases”</i></p> <p>The text of the programme should include a commitment on the flexibility of the composition of the delivered support.</p> <p>It is not requested to indicate the specific amounts or quantities of individual products, but a commitment to ensure a balanced delivery of products in the different categories depending of the needs. In each operation text there is need to define ex-ante the content of each support. The programme cannot delegate all the subject matter to a Ministerial Ordinance that must be only defined on the basis of the ESF operation structure and content.</p>	
<p>Under the current FEAD OP, on average around 550 000 people receive food packages annually. The new OP envisages that the number of people will be on average around 350 000 annually.</p>	<p>We take into consideration the comment and provide the following explanations: In the programming period 2014-2020, more than 250 000 food packages were purchased annually, reaching</p>	<p>The explanation on this point remains unclear.</p> <p>The calculation of the supported number of people is a key output indicator also to be reported in the monitoring of the programme. For this reason, a clear</p>	<p>Comment accepted</p> <p>The focus of the proposed revision under "Type of aid: food and hygiene packages" is on the final recipients of the aid, not on the number of packages to be distributed. Based on data from the ASA on social benefits granted, it is expected that</p>

<p>How would you ensure that the envisaged number of food packages would be sufficient to cover the needs for food support and would you consider a further increase, if necessary?</p>	<p>on average around 550 000 people.</p> <p>In the programme text, section “PACKAGES OF FOOD AND HYGIENE MATERIALS” is pointed out that:</p> <p>Based on the annual data of the Agency for Social Assistance on the number of individuals and households who receive social benefits and the analysis of the trends in social assistance, more than 350 000 packages of food products and the same number of packages of hygiene materials are expected to be distributed on an average annual basis.</p> <p>The amount is indicative and refers to the number of packages, not the number of final aid recipients. The number of packages will be determined annually on the basis of data from the Social Assistance Agency for persons identified for assistance.</p> <p>Following the previous programming period approach, food packages and hygiene packages are defined as a predetermined and approved minimum set of types and quantities of</p>	<p>methodology is needed to evaluate the plausibility of the indicated participants and in view of the available financial resources for each type of operation, the average cost of a package and the average potential recipients in each household that can be beneficiary in the present rules and procedures.</p> <p>Even some estimations can be done to define the sub-indicators as children, people with disabilities, etc. the overall figure on supported participants should be based on objective criteria and calculation methods.</p> <p>The differentiated approach in terms of the content of the packages should be also clearly defined in the Programme text.</p> <p>This figure is not clear and it makes reference to an accumulative support for the whole period of per year. Also in the case of each type of intervention there is a need to define the expected number of recipients.</p>	<p>the packages purchased will reach about 530 000 people in need. These individuals are part of families with varying numbers of members, with one-, two- and three-person families predominating. About 10% of the total number of persons are in families with four or more members and a differentiated approach will be applied to them in terms of quantity of products and, if applicable, in terms of content. Corresponding additions have been made to the programme texts.</p> <p>Regarding the recommendation on defining sub-indicators such as children, people with disabilities, etc., our understanding is that sub-indicator defining in programme at that moment would limit the opportunity for flexibility. In addition, the definition of such sub-indicators in the programme is not a requirement under the draft ESF+ Regulation. Such indicators shall be reported as foreseen in ANNEX III - General indicators for ESF+ support to address material deprivation of the draft regulation.</p> <p>Our understanding is that material support under the programme addresses specific needs, competently assessed by national authorities according to objective criteria, at a specific time. Defining sub-indicators at this stage may therefore be restrictive.</p>
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	<p>individually packaged foods and / or hygiene materials to be provided to the most deprived persons. In the next programming period the quantities in the packages will be differentiated depending on the number of family or household members.</p> <p>In addition, in section 1 “Programme strategy: main development challenges and policy responses” is also mentioned that “for the 2021-2027 programming period, a level of 600,000 people living at risk of poverty that will be provided with food and material support will be achieved”.</p>		
<p>On the composition of the hygienic and cleaning products, the national authority are invited to analyze the possibility to have different composition of the packages (or adding additional items) depending on the needs of the families (e.g. include specific children/baby hygienic products, young girls’ sanitary napkins, etc.).</p>	<p>We take into consideration the comment and provide the following explanations:</p> <p>The types of hygiene products will be determined by taking into account the needs of the specific recipients of support and indicatively will contain - personal care products, cleaning products and detergents. The composition of the packages, their quantity including specific requirements will be indicated in the respective guidelines for applicants in order to have</p>	<p>Some basic reference to the categories of products in the case of food products or hygienic products should be present in the text of the programme. A wording as <i>“among other the following products XXX, YYY, ZZZ will be present”</i> or <i>“the products ZZZ or RRRR will be included in all cases”</i></p> <p>The provided specific support for new born is welcome in the new programme, however more specific support for children via the general provision of food and hygienic products also shall be envisaged as this support cover much wider group of the population.</p> <p>The beneficiary can allocate in the</p>	<p>Comment accepted.</p> <p>The following additions will be made to the programme text:</p> <p>1. Regarding food products:</p> <p>When determining the contents of the packages, a balance will be sought so that they contain products from the main food groups necessary for a healthy and varied diet, such as protein-rich foods, cereals, etc.</p> <p>2. Regarding hygiene products</p> <p>The types of hygiene products will be basic personal care and cleaning products used by the whole family. The content will be determined on the basis of an analysis of the structure of the assisted families and households - age, gender and other characteristics of the persons in need, as well</p>

	<p>more flexibility and to be able to meet people's needs to the greatest extent. This form of support should have a universal character in terms of its content. Products that are used by the whole household and meet the identified needs will be selected. Thus allowing for the release of funds from the family budget to meet other basic needs.</p> <p>As part of the support to measures for early child development within the programme, packages will be purchased of basic products needed for new-born children from poor and vulnerable families as identified by the social assistance authorities. Indicatively, the packages will include baby diapers, wipes, baby cosmetics and other products that are consistent with the basic need and the age of the child.</p>	<p>packages such specific products depending of the presence or not of children in the household following the data provided by the Social services.</p>	<p>as taking into account their specific needs. The packages will indicatively contain - personal care products, cleaning products and detergents.</p> <p>3. The following texts will be also provided:</p> <p>A differentiated approach will be applied with regard to the quantity and, if applicable, the content of the packages, depending on the number of household members, age or other specific characteristics of the persons in need, so that the assistance is sufficient and corresponds to identified needs. The support will be based on an individual approach, needs assessment and an objective assessment of the degree of vulnerability of individuals.</p>
<p>Accompanying measures under the food and hygienic packages are elaborated in much greater detail than the other measures. However, you describe also the basic accompanying measures for the different types of</p>	<p>We accept the comment and provide the following explanations:</p> <p>The concept for implementation of accompanying measures for each type of assistance under</p>		

<p>interventions, which are most suitable for each type of final recipient and the possible reference to relevant ESF plus services. Could you also describe the mechanism to ensure follow-up approach in case the end recipients have been guided to the relevant social, employment or health service under the ESF plus.</p>	<p>the program is based on an individual approach to the needs of the covered persons. The programme focuses on providing basic needs support to those in need, but no less significant is its contribution to identify those specific people who are most in need of complex and long-term support to get out of the vicious circle of poverty. As it was already mentioned, in the course of the measures implementation, a mechanism for data exchange and provision of information by and to beneficiaries and other managing authorities will be established for provision of specific measures in support of the target groups representatives where possible and according to their profile. The final recipients of the assistance under the programme will be directed as a target group of various specific measures and projects implemented with the support of ESF + under other programmes, where the results achieved will be follow up subsequently. An element of the information exchange mechanism will be the provision of feedback on</p>		
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	<p>the results of the support provided after the referral of the neediest people. Validation of the achieved social inclusion results of the covered persons will be ensured through an external evaluation of the programme. In this regard, in section <i>Types of support:</i> PACKAGES OF FOOD AND HYGIENE MATERIALS, <i>Complementarity with other measures under ESF+ and national support schemes,</i> the following information is added:</p> <p>For each end user that have been referred/covered a feedback on the results achieved will be reported back, where applicable.</p>		
HOT LUNCH			
		<p>The text of the section must address better the challenge to which this type of support will respond and not put the focus on the potential beneficiaries or on the budgetary implication beyond the need for “additionally” compared with the ordinary budgetary allocations for the function “Социално осигуряване, подпомагане и грижи”.</p>	<p>Comment accepted The text in section 2.1.2 regarding type of aid: Hot lunch will be updated in line with the proposed remarks.</p>
<p>On the hot lunch provision, we take note that the main and additional target groups will</p>	<p>We take into consideration the comment and provide the following explanations:</p>	<p>From the provided explanation it is not clear if there will be any differentiated criteria between the target group getting</p>	<p>Comment accepted With regard to the target groups, we would like to clarify that the basic understanding embedded in</p>

<p>be defined in national ordinance as for the other types of support. The national authorities are invited to describe what would be the differentiated approach and main criteria used compared with the food packages support and if there would be possible complementarity in the cases where this is relevant</p>	<p>In the programme text, section "HOT LUNCH support type" is pointed out that:</p> <p>A hot lunch will be provided as a priority to persons that are subject to social assistance, people with self-service difficulties, low-income people, homeless people, etc., for whom the local social assistance authority has identified a high risk of poverty and social exclusion. Subject of assistance may also be persons who get into difficulty as a result of natural disasters, pandemics and others, force majeure in order to handle the emergency situations. Priority will be given to persons for whom the day-to-day support is vital. The frequency of support will allow for continued and systematic contact with persons in need, which in turn will also extend the possibilities of providing accompanying support according to the needs, including provision of complementary support with other measures under</p>	<p>packages and hot lunches. There is a need to insist that the hot lunch might also have a component of urgency and flexible access in view of the daily delivery.</p> <p>As indicated in the previous type of intervention, the Ministerial Ordinance must group and detail the eligibility criteria as implementation rules, but the programme should include the main criteria on which the operation will be based and not just refer to the Ordinance as such for the definition of the criteria.</p>	<p>the formulation of the hot lunch support is that this assistance is provided to people from the groups indicatively defined in the programme who have a daily need for it, which will be established by the social assistance authorities.</p> <p>The following text will be added to the programme texts:</p> <p>"Flexibility will be allowed to ensure that support is provided in the size, quantity and frequency required, including where urgent and immediate needs are identified."</p>
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	<p>the programme, where necessary”.</p>		
<p>It will be useful to clearly define the scope of intervention of the national Social Protection Fund in the financing of renovation of premises and equipment for the delivery of hot meals and avoid any overlaps with delivery of hot meals on the ground.</p>	<p>Comment accepted Pursuant to article 25 of Social assistance act Social Protection Fund with the Minister of Labour and Social Policy is established a as a second-level spending unit. Annual cost estimate of the Fund is based on the Governing Board decision. After endorsement of the budget of the Fund by the Minister of Labor and Social Policy, the Governing Board of the Fund decides on opening a call for proposals, adopts criteria for projects evaluation and determines the purpose of social benefits and target groups that will be granted. The described mechanism of financing and defining the specific objectives enables Fund measures complementarities with all other instruments for assistance of the neediest people to be performed in a flexible way according to the identified specific problems. In this regard in section “Hot lunch type of support - <i>Decryption of the national or regional schemes of support</i>”</p>	<p>There is still need to clarify the exclusive delivery of this type of support by the municipalities in view of their regulatory competence to deliver social support on their territory and responsible for the management of services funded by the state budget. Therefore, could be useful to include in the text of the programme the specific conditionality provided by the national law which justifies their pre-selection.</p>	<p>We accept the comment and we offer the following explanation; Pursuant to Social services act municipalities as public entities and self-government bodies are the main service providers in the country. Social services at municipal level are provided to meet the needs of the population in the municipality. Municipal councils shall determine the municipal policy in the field of social services in accordance with the established needs at municipal level and the priorities in the state policy. The Social Services Act regulates all the rights and obligations of state and local authorities related to the provision of social services, and in addition stipulates and systematizes the rights and obligations of municipalities not only as the main provider of social services but also as local self-government body. It is the responsibility of the Mayors of municipalities to analyze the needs of social services in the municipality and conduct the municipal policy in the field of social services in accordance with the decisions of the municipal council. Under the Food and Basic Material Assistance Programme 2021-2027, support to the most deprived persons in the form of hot lunches is to be implemented by municipalities and districts of municipalities. In order to receive funding, municipalities have to implement the service on the basis of a decision of the relevant municipal council. In this way, the hot lunch operation will become part of the targeted social policy that municipalities develop to support people living in material deprivation and at risk of social exclusion. Hot lunch support is not defined as a service solely related to the provision of food to persons in need.</p>

	<p><i>is stated that:</i> “The measure will complement the activities implemented under the Public Canteens targeted programme of the Social Protection Fund. In order to ensure complementarity, The Fund will finance renovation of the premises and the equipment for food preparation, in particular at places where the equipment for the implementation of such activities is missing or obsolete”.</p> <p>For greater clarity, the following information will be added:</p> <p>Given the financing mechanism of the Social protection fond and the annual determination of the parameters of the its support, the complementarity between the two instruments will be defined at the level of announcement of guidelines for applicant procedures and will be monitored at the level of implementation. Double assistance with hot lunch from different sources at the same time will not be allowed. That is the main requirement to be monitor under the Food and Basic Material support program</p>		<p>Through the accompanying measures provided, in addition to the provision of a hot lunch, the activity relates to social services implemented at local level in order to overcome the effects of poverty. The accompanying support is a mechanism for referring hot lunch users to different forms of social services, which are also implemented by municipalities. This approach ensures better follow-up of the results of the implemented accompanying measures for each individual user. This approach, which proved its advantages in the previous programming period, gives confidence that the aid will be provided throughout the country on equal terms for both the beneficiaries and the final recipients of the aid and will not allow a concentration of the service in certain territories at the expense of others where there is no interest from other providers.</p> <p>In addition, according to art.29 (1) of Social services act the provision of social services shall be ensured by the municipalities through:</p> <ol style="list-style-type: none"> 1. independently organizing and implementing all activities related to the direct provision of social services; 2. legal entities specially created by the municipality for the provision of social services; 3. Assigning the provision of social services to private providers of social services. <p>According to the Social services act only municipalities can assign the provision of social services to private providers of social services. Those opportunities that the legislator has provided will also be made available in the application documents. This will enable local collaboration and the involvement of other providers in the provision of hot lunches.</p> <p>In this regard, the programme text will be</p>
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	2021-2027.		<p>complemented as follow: Pursuant to Social services act municipalities as public entities and self-government bodies are the main service providers in the country and only the municipalities can assign the provision of social services to private providers of social services. As local government bodies, municipalities are responsible for the analysis of needs, the implementation of policies for the provision of social services, as well as for their organization and management. In this way, the hot lunch activity will become part of the targeted local social policy that municipalities develop to support people living in material deprivation and at risk of social exclusion. The legal possibilities that municipal have to assign the service will also be used in the implementation of the operation, thus creating conditions for fresh food to be provided on equal terms throughout the country</p>
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BABY/CHILDREN MEAL

<p>The Commission analysed the idea to provide baby/children meals to children from 10 months to 3 years age old who come from poor and disadvantaged families. In view of the fact that at present already such initiative is ongoing for many years in many municipalities, there is a need to provide a clear justification on the intervention mode and the intention to include new additional users who could only to be covered by ESF</p>	<p>We accept the comments and, after discussion with stakeholders, we propose an amendment to the operation text. The changes are reflected in the programme and affect the mechanism for implementation of the operation, the way of</p>	<p>The main eligibility groups should be part of the programme text, the Ministerial Ordinance is in all cases a consequence of the criteria of the operation and can provide details and procedures for selection.</p> <p>The procedure for delivery of the new-born packages is still unclear un terms of responsible authority and potential beneficiaries in view of the needed follow up actions defined in the programme.</p> <p>It is acknowledged the intention of the authorities to use the system of vouchers for the provision of baby meal type of</p>	<p>Comments accepted The text in section 2.1.2 regarding type of aid: baby/children's meal has been updated in line with the suggested comments and clarifications have been made to the questions raised.</p>
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<p>plus operation As regards the taxes paid by parents to benefit from this service, at present those are defined by the municipalities themselves and in most cases no social criteria is used. More information on the rules and procedures for the parents' taxes is requested in order to evaluate their pertinence. In view to ensure a comprehensive approach, instead of grants to municipalities, the authorities are advised to consider using electronic vouchers for the baby/children meals which will be directly provided to the eligible families. In this way, the support measure could avoid additional administrative burden for the municipalities and on the contrary could ensure a more continued follow-up for the different users.</p>	<p>providing support and the way in which the results of the provided support will be implemented and monitored.</p>	<p>assistance. As explained in the past it is still unclear on what basis the taxes for parents, that will be subject to be covered with the vouchers, are defined by the municipalities.</p> <p>Also, it is not clear how the overall costing and complementarity of the ESF compared with the nationally funded measures will be done.</p> <p>If vouchers are implemented in this type of operation, there won't be need to certify the expenditure on meals as such but only the effective delivery of food (and usage of the vouchers) such. In the text, there is a contradiction of the process to be followed as still now we have a unit cost per meal per day...instead of a voucher amount.</p> <p>The estimation that 10.000 children will be supported under the ESF operation remains unclear. Are those on top of the usual 25500 users or they are within this general group?</p> <p>There is still need to clarify the exclusive delivery of this type of support by the municipalities in view of their regulatory competence and technical availability of infrastructure to deliver social support on their territory and responsible for the management of services funded by the state budget. Therefore, could be useful to include in the text of the programme the specific conditionality provided by the national law which justifies their pre-</p>	
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		selection.	
		Tables on categories of intervention must be completed in accordance for all relevant cases.	Comment accepted. The relevant additions have been made.
		The table with financial plan per year needs to be completed in accordance with the final version of the programme template agree in the CPR.	Comment accepted. The relevant additions have been made.
		It is observed that funds only from the category of regions “Less developed regions” are used for this programme, however there is no justification of this in the strategy part, in view of the possible support also in the Transition region of South West.	Comment accepted The relevant amendments have been made to the programme text. The programme support will not be limited to a specific region or municipality. The guiding criterion will be the need for support. In this regard, financial resources have been envisaged for the Transition region of South West. The MA calculations show that if the resources under the programme (189 450 000 euro EU funding) are distributed evenly among the 6 regions, taking into account the scope of the programme, the South-West region should be granted an indicative amount of 31 575 000 euro of EU funding or 16.7% of the total resources. It should be borne in mind that pursuant to Article 9 of the draft ESF+ Regulation, the co-financing rate for the programmes aimed at tackling material deprivation shall be 90%, i.e. with the national co-financing, the funds for the region in transition would amount approximately to 35.1 million euro in total.

		The requested co-financing rate must be aligned with the final dispositions of the CPR as agreed by the co-legislators.	Comment accepted. The relevant additions have been made.
		The table with bodies responsible for the programme must be completed with the names and contacts of the responsible people.	Comment accepted. The relevant additions have been made.
		The section 6 on Partnership: should be re-defined removing part of the actual administrative text on the followed procedures, maybe with just a reference to it. The main part of the text should clarify the details if the consultation carried, who replied, when the programme was in public consultation, how the comments were addressed by the authorises, etc. Also, it is relevant to defined how this collaboration will continue during the implementation, monitoring and evaluation of the programme operations.	Comment accepted. The relevant additions have been made.
		It is recommended to re-define the information of the Unit costs to be used in the operations as part of the programme in Section 6 with the provision of an adequate methodology for their definition. The annex A at present only defines some of the main components of the planned unit cost for Hot meals, but is not delivering a methodology for its calculation. The flat rates to be added for accompanying measures and administration if pertinent must be assessed	MA is ready to prepare a Methodology for determining the value of a voucher/card for a baby meal. In this connection, the relevant amendments will be made to Annex A

		independently from the main methodology for the calculation of the unit cost.	
		<p>The information in Annex B should be revised in accordance of the previous comments. Some of the lines should be revised so to respond to the requested information.</p> <p>The methodology fixing the unit cost should be included in the document. A single reference to the national social hot meals, seems insufficient for the definition of this unit cost in the Programme text.</p>	<p>Comment accepted. Annex B has been amended accordingly.</p>