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### Key Problems and Gaps in the EU Funds Absorption for Heritage Attractions Development: the Case of Bulgaria

Marinov, V.\*  
Assenova, M.†  
Dogramadjieva, E.‡  
University of Sofia (Bulgaria)

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#### ABSTRACT

Heritage tourism has always been considered an important part of Bulgarian tourism portfolio and a significant regional development driver. It is officially set as a priority in a number of strategic documents at a national, regional and local level. Substantial financial resources for heritage socialization have been allocated after the accession of the country to the EU in 2007. A special scheme for tourism attractions development was implemented within the Operational Program “Regional Development” (OPRD) 2007-2013, with approved funding for a total of 120 heritage sites throughout the country. Yet, the EU funded projects have raised a fierce public debate regarding the delicate balance between heritage commodification and conservation as well as the disputable costs and benefits in terms of heritage protection, tourism development and its regional impacts. Based on the understanding that attractions are the core element of a competitive tourism product, the paper presents a brief review of the OPRD 2007-2013 supported projects and analyzes the experience gained in the process of projects’ selection and implementation.

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**Keywords:** Heritage Attractions; Public Projects; Evaluation

В България туризмът, основан на наследството, винаги е бил считан за важна част от националния туристически продукт и съществен фактор за регионално развитие. Той е обявен за официален приоритет в редица стратегически документи на национално, регионално и местно ниво. Сериозни финансови

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\* E-mail address: [vasil.marinov@gmail.com](mailto:vasil.marinov@gmail.com)

† E-mail address: [mariana.assenova@gmail.com](mailto:mariana.assenova@gmail.com)

‡ E-mail address: [elidogramadjieva@gmail.com](mailto:elidogramadjieva@gmail.com)

ресурси за социализация на културното и природното наследство бяха изразходвани след присъединяването на страната към ЕС през 2007 г. В рамките на Оперативна програма „Регионално развитие“ (2007-2013) беше приложена специална схема в подкрепа на туристическите атракции, с одобрено финансиране на 120 културни и природни обекта в различни части на страната. Същевременно, европейските проекти предизвикаха ожесточен публичен дебат относно деликатния баланс между комерсиализацията и опазването на наследството; спорното съотношение между разходите и ползите в контекста на опазването на наследството, развитието на туризма и ефектите за регионалното развитие. Изхождайки от разбирането, че атракциите са ключов елемент на успешния туристическия продукт, статията представя преглед на подкрепените проекти от ОПРР 2007-2013 и анализира придобития опит в процеса на техния подбор и реализация.

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**Keywords:** Културно и природно наследство; атракции; публични проекти; оценка

## Introduction

Tourism is a key sector of Bulgarian economy generating 3.3% direct contribution and more than 12% total contribution to the country's GDP in 2015 (WTTC, 2016). Traditionally known as a mass seaside and ski tourism destination, Bulgaria relies on diverse natural and cultural heritage including nine UNESCO Heritage Sites as well as 4,100 caves (12 of them adapted for tourist visits), more than 600 mineral springs, 30 thousand historic monuments, 160 monasteries, 36 architecture reserves, unique folklore, national cuisine and quality wines.

Heritage tourism has always been considered an important part of Bulgarian tourism product and a significant regional development driver. It is officially set as a priority in a number of strategic documents at a national, regional and local level which all stress the need for diversification and adding value to traditional tourism products as well as improving the spatial balance of tourism development.

Public financial support for heritage-based attractions development in Bulgaria is regarded as the main public policy tool for regional tourism development. Rough estimates indicate that public investments in support of Bulgarian tourism in 2000-2006 would hardly reach EUR 40-50 million and were provided mainly by the pre-accession funds of PHARE and SAPARD, as well as other international donor programs. In contrast, during the first EU post-accession period (2007-2013) the volume of public investments for direct support of tourism was assessed to be 8-10 times higher, with the main financial source being the Operational Program "Regional Development" (OPRD) with intended budget for tourism-related operations worth of EUR 218 million. This second period marked the transition from "policy-making without money" to "policy-making with a lot of money" which posed new challenges to Bulgarian tourism policy (Marinov, 2007, p. 2).

Bulgaria has never had as many public financial resources available for the development of its heritage tourist attractions, as those provided in the years of its EU membership. Yet, the EU-funded projects have raised a fierce public debate regarding attractiveness vs. authenticity, the delicate balance between heritage commodification and conservation as well as the disputable costs and benefits in terms of heritage protection, tourism development and their regional impacts (Leshtarska, 2014; Stoilova & Yordanova, 2015). Moreover, serious concerns have been raised by a number of respected heritage experts stating that the implemented projects had already caused irreversible heritage damages, generously supported by European taxpayers (Borislavov, 2015; Gavrilova, 2015). This has led to the rise of civil society initiatives criticizing many of the implemented projects and insisting on more responsible (i.e. conservative) approach to heritage attractions development (Cultural Heritage Forum Declaration, 2015). In certain cases, sharpening the debate has even led to denial of the need for heritage attractions development (Koleva, 2015).

This paper seeks to implement a more balanced approach to the above important issue based on a literature review clarifying the nature and importance of heritage attractions for the development of competitive tourism products. The study methodology combines qualitative and quantitative approaches to the analysis of

OPRD 2007-2013 and the projects funded under the Program's specific operation, dedicated to the enhancement of heritage attractions and related infrastructure. More specifically, the implemented projects are analyzed in terms of both the spatial distribution and the type of supported attractions, and are assessed against the Program logic and objectives. Further, the Program ex-post evaluation is discussed with emphasis on the reported indicators and their target values. Finally, the OPRD 2007-2013 gaps and intentions regarding the current Operational Program "Regions in Growth" (OPRG 2014-2020) are summarized in five key problematic areas.

## 1. Literature review

Over the past decades the world has witnessed a proliferation of heritage sites development accompanied by intensifying academic debate concerning the concept of heritage and heritage attractions as a core element of the heritage tourism product. It has been fostered by the "strong and fertile links that have been established between heritage studies, museum studies and a wide range of professional and amateur heritage practitioners who are working at the 'sharp end' to conserve, present and interpret material in the present" (Harvey, 2001, p. 323).

Neither scholars nor practitioners are unanimous in regard to the essence, specifics and typology of the above terms. Heritage, for example, has received so many different definitions that Lowenthal claims it "all but defies definition" (1998, cited in Harvey, 2001, p. 319) which "in itself raises the question of whether we need a tight definition at all" (ibid.). Issac (2008, p. 14) summarizes that "*heritage* in its broader meaning is associated with the word *inheritance*; that is something transferred from one generation to another". In a narrower sense "it is not simply the past, but the modern-day use of elements of the past" (Timothy & Boyd, 2003, quoted in Issac, 2008, p. 14). Indeed, many scholars have viewed heritage as the endorsement of the past to serve various purposes in the present (Ashworth, 2003; Graham, 2002; Graham & Howard, 2008; McDowell, 2008; Peckham, 2003).

With respect to tourism, the word heritage has been used in both cultural and natural contexts, although heritage tourism is widely considered a part of cultural tourism (Issac, 2008; Paschinger, 2007; Smith, 2003). In a tourism perspective "in its raw state heritage is simply the natural, cultural and built environment of an area" (Millar, 2004, p. 3) while the heritage (tourism) industry "draws on the past for the benefit of the present and future whether in the form of ideas, images, stories, plays, traditions, buildings, artefacts or landscapes" (ibid.). Such an understanding is in line with the earlier statement of Swarbrooke (1994, p. 222) that "heritage is only heritage in tourism terms when it is of interest and accessible to tourists". This opinion is even more clearly stated by van der Borg and Costa (1996, p. 162): "Having heritage is one thing, using it another. It is the accessibility of heritage which makes the difference". Furthermore, Timothy and Boyd (2003, cited in Paschinger, 2007, p. 26) argue that heritage being interesting and accessible to tourists is one of the first steps towards the creation of a "heritage product". The second step lies in marketing heritage which is

valued as a commodity to tourists, leaving them with the final product, the “heritage tourism experience”.

The above opinions highlight the indisputable importance of visitor (heritage) attractions to tourism which has been recognized since the 1970s (Lew, 1987). Attractions are fundamental to the very existence of tourism as they are the basic element on which it is developed, having the drawing power and serving as a motivator for tourists to travel to a particular destination. As defined by Lew (1987, p. 554):

Tourist attractions consist of all those elements of a “non-home” place that draw discretionary travelers away from their homes. They usually include landscapes to observe, activities to participate in and experiences to remember (...) attraction in its widest context would include not only the historic sites, amusement parks, and spectacular scenery, which are normally associated with the word, but also the services and facilities which cater to the everyday needs of tourists.

In a narrow sense attractions are identified with those resource assets and facilities that are commercialized to a certain degree (Holloway, 2002). Thus, it is stressed not only on the initial driving force of attractive tourism resources but also on the ultimate necessity of their adoption through adequate facilities and services for tourists. Lew points out that “no site or event is an attraction in itself: for it to draw tourists, it has to be marked as such” (2000, p. 36). This is closely related to the above cited concept of heritage accessibility to tourists (Swarbrooke, 1994), considering both physical and intellectual accessibility, the latter being provided mainly by means of adequate tourist interpretation and animation techniques (Richards, 1996a; Shackley, 1998, cited in Paschinger, 2007, p. 38).

It is widely accepted that attractions form the core element of cultural and heritage tourism product (Munsters, 2004; Swarbrooke, 1994, 1995). Among the main challenges to successful product development is to cope with the “ongoing conflict between conserving the heritage and allowing access to visitors” (Leask & Yeoman, 2004, p. ix). Besides the specifics of the heritage assets, product development and management should also consider the needs and requirements of the customers ensuring a participatory and relevant experience and making the heritage come alive (Richards, 1996a; McKercher & du Cros, 2002; Poria et al., 2003, 2004, 2006). Furthermore, planning, management and control considerations need to be taken into account when heritage assets are to be transformed into attractions and/or complete tourism products (Paschinger, 2007, p. 156). In this respect it is also worth mentioning several criteria that make up successful heritage attractions as identified by Garrod and Fyall (2000, p. 686): 1) inexpensive and visitor-friendly; 2) physically and intellectually accessible; 3) balanced in terms of the needs of the visitors and the need for conservation; 4) providing authenticity and integrity; 5) value for money. Some of these criteria are very difficult to achieve and it is often expected that public authorities will ensure the required balance between commodification on the one hand, and quality and public interest on the other.

Another important aspect of heritage attractions development related to tourism policy and to our analysis is the growing number of attractions, their spatial distribution and marketing strength. Richards (1996a) points out that the supply of

cultural attractions throughout Europe has grown rapidly, which has created a situation where supply is outstripping demand. Among the main reasons for this situation is that cultural (heritage) tourism at European level is viewed as a convenient marketing solution to the problems of spatial and temporal concentration of tourism. It is often seen as a way of “enticing tourists to as yet undiscovered regions releasing pressure on tourist ‘honeypots’, particularly in the high season” (1996a, p. 235). In many countries, however, “the cultural attraction market is becoming increasingly polarized between a few major attractions which attract millions of visitors every year, and a growing number of smaller attractions, which must share a declining pool of visitors between them” (Richards, 1996a, p. 240). Furthermore, the problem of “serial reproduction” appears (Richards & Wilson, 2006, quoted in Richards, 2009, p. 2) leading to the loss of identity and substitution effect: “There is a certain irony in destinations seeking to develop their uniqueness through cultural tourism. In fact, many places follow similar strategies in order to achieve their uniqueness, which ends up making those places feel and look the same.” (Richards, 1996a, p. 240). Additionally, the experience of the UK, for example, has shown that the efforts put by provincial centres to develop heritage attractions and use tourism as an engine for economic development and image enhancement “have not resulted in a significant geographic shift in the pattern of cultural tourism consumption” (Richards, 1996b, p. 50).

Most of the above statements directly correspond to the state of affairs in Bulgaria, although the topic of heritage attractions is rather new here both in tourism research and in tourism policy and planning. It has entered the academic debate in the past decade, mainly in regards to the recognized need for better utilization of diverse heritage assets (Assenova, 2005; Dogramadjieva and Ivanova, 2008). Recently it has become quite important due to the concerns regarding the EU-funded projects for heritage attractions development (Marinov et al., 2014; Mileva, 2015).

## **2. OPRD 2007-2013 in support to heritage attractions development: implementation and results**

The Operational Program Regional Development was guided by the principle that public interventions should address market failures (OPRD, 2007, p. 68). The analysis of tourism development in Bulgaria concluded that the lack of developed attractions and the limited and fragmented marketing activities were the main market failures preventing the diversification of the product mix and the more balanced spatial development of tourism (OPRD, 2007, p. 117). This conclusion drove the design of the specific interventions along the tourism priority axis within OPRD. It was focused on identification and support of bigger projects, that would develop and market strategically located competitive tourism products based on cultural and natural heritage, outside the highly developed tourism centers. They should be able to attract significant number of visitors and to have impact on national and regional tourism growth and on the spatial structure of tourism.

More specifically, activities to be supported under the sustainable tourism development priority (Priority Axis 3) were structured in three operations (Table 1). The first operation with the highest financial allocation emphasized heritage tourism by the development of natural, cultural and historical attractions (e.g. renovation, conservation, exhibition, equipment, introduction of interpretation and animation techniques and programs, etc.) and related infrastructure. In the Guidelines for applicants (2009) tourist attractions were defined as tourist sites that represent a complex tourism product or experience. Although the definition is quite broad, it matches up with the above discussed idea that heritage attractions are the core of the product and represent an amalgam of resources, facilities and services ensuring the tourist experience.

**Table 1:** Operations within the OPRD Priority Axis 3 and their financial allocation

Operations within the Priority Axis 3	Financial allocation
Operation 3.1: Enhancement of Tourist Attractions and Related Infrastructure	EUR 152.7 million
Operation 3.2: Regional Tourism Product Development and Destinations Marketing	EUR 32.7 million
Operation 3.3: National Tourism Marketing	EUR 32.7 million

Source: OPRD 2007-2013

Four grant schemes worth a total of EUR 102.3 million (actually paid) were launched in the period 2008-2011 within the Operation 3.1 (Table 2).

**Table 2:** Launched grant schemes within Operation 3.1 of OPRD 2007-2013

Grant schemes	Year of launching	Eligible beneficiaries	Number of supported projects	Projects cost (EUR)
Support to heritage sites of national and international importance	2008	Ministry of Culture	10	14.2 million
Support to tourist attractions enhancement	2009	148 municipalities	14	13.4 million
Support to natural and cultural heritage sites	2010	161 municipalities	46	70.2 million
Restoration and conservation of the Evksinograd Palace and its park	2011	Council of Ministers	1	4.5 million

Source: The Unified Management Information System for the EU Structural Instruments in Bulgaria, 2016.

By the end of 2015 seventy-one projects were implemented within Operation 3.1 and 120 heritage sites (116 cultural and 4 natural) were modernized and adopted for tourist visits. The projects were implemented within 65 municipalities (out of 265 municipalities in Bulgaria), thus supporting the enhancement of tourist attractions in areas with various types of tourism development, predominantly in the country interior and especially in mountain areas notable for their rich and diverse tourism potential (Figure 1). Only one project was usually implemented within a municipality. Yet, four municipalities of outstanding cultural heritage were an exception having implemented a greater number of projects funded by different grant schemes within Operation 3.1:

Veliko Turnovo (4 projects); Sofia, Stara Zagora, and Ruse (2 projects each). Supported projects could be classified in nine groups according to the type of attractions included (Table 3). The greatest majority of projects (52%) were aimed at socializing archeological and historical sites from Ancient and Medieval times which could be explained by the country's abundance of such resources as well as by their poor tourism utilization until then. However, the large number of reconstructed and often newly built fortresses could be seen as a problem in terms of both heritage protection (violated authenticity) and competitive potential (substitution effect in tourist visits).



**Figure 1:** Heritage sites in Bulgaria supported under Operation 3.1 of the OPRD 2007-2013.

Source: Ministry of Regional Development of Bulgaria

The second biggest group of projects (14%) is also focused on archaeological and historical heritage, though in combination with architectural or religious sites from different periods. In third place are projects directed towards enhancement of museums and crafts exhibitions (11%). Their limited number reflects the initially set restrictions regarding interventions in museums (not eligible in the beginning) that were eliminated only in the third grant scheme launched in 2010. Next come projects supporting the renovation and conservation of architectural sites presenting typical examples of Ottoman, Bulgarian Revival or neoclassical architecture (8%), followed by those dealing particularly with religious sites (6%). Memorials and industrial sites are among the less popular ones to be converted to tourist attractions as they form the core of just two projects. Somewhat surprisingly, few projects deal with the enhancement of nature-based attractions, either of pure natural heritage or valuable nature and historical sites integrated in common tourism products.



**Table 3:** Grouping of implemented projects by the type of supported attractions

Type of attractions	Number of projects	Share of projects
Ancient and medieval archaeological & historical sites	37	52%
Mixed cultural heritage sites (various types from different periods)	10	14%
Museums and craft exhibitions	8	11%
Architecture sites	6	8%
Religious sites	4	6%
Mixed natural & cultural heritage sites	2	3%
Natural sites	2	3%
Memorials	1	1%
Industrial sites	1	1%
<b>TOTAL</b>	<b>71</b>	<b>100%</b>

Source: Grouping by the authors based on information from the Ministry of Regional Development

### 3. The ex-post evaluation of the Program

The ex-post impact evaluation of OPRD 2007-2013 was carried out in 2015 (ECORYS, 2015). While ascertaining the high effectiveness of interventions, especially in the tourism priority axis, it emphasized the significant gaps regarding indicators and their target values that should be taken into account in the interpretation. The issues related to indicators include gaps in programming (the program and/or the design of specific schemes), the lack of manual on indicators (specification of methodology, etc.), and the lack of clear guidance in the Guidelines for applicants. The issues of target values relate to the appointment of too high values or too low values along with the implementation of different methodologies for defining the target values and their reporting. Another problematic element, relevant especially to tourism interventions, is the requirement for the beneficiaries to provide data available from reliable sources (such as the national statistics) which could not be influenced by their projects only. The latter refers especially to the impact indicators “Net income from international tourism” (provided in the Balance of payments) and “Bed-occupancy of accommodation” (provided by the National Statistical Institute at municipal level) indicating that no distinction has been made between the evaluation at the project and the program level.

The estimate of the net impact of OPRD on the real GDP by 2014 is 1.1% (i.e. the real GDP by 2014 would have been lower by 1.1% in the absence of OPRD interventions). The contribution of tourism interventions (the whole priority axis) by the end of 2013 seems to be low but broadly corresponds to their share in the OPRD financial resources. For example, the contribution of tourism interventions to GDP accounts for 0.05% (6.6% of the total program contribution by 2013); to the private investments – 0.13% (5.1% of the total program); to the export of goods and services – 0.02% (8% of the total program).

The more specific observations regarding tourism-related indicators include:

- The targets for all output indicators have been achieved and exceeded.
- The target for the impact indicator “Net income from international tourism” (EUR 1,475 million) was achieved in 2010 when no single tourism project had been implemented, i.e. it was not influenced by the program. This resulted from the fact that the negative impact of the financial and economic crisis was higher for outbound than for inbound tourism. While in 2005-2010 the net income increased by EUR 901 million (almost twice), in 2010-2013 the increase was only EUR 93 million.
- The target for the impact indicator “Bed-occupancy of accommodation” (45%) has not been achieved – in 2013 it was 37% and in 2014 – 35%. The evaluators believe that the set target was too high in view of the financial and economic crisis in 2008-2009. However, in our understanding it was very low in international comparison, and the explanations for underperformance may be different: 1) the small number of finalized projects by 2013-2014 and 2) the supported attractions did not generate an additional flow of overnight visitors especially at national scale but have only led to their redistribution by increasing the set of opportunities during their stay (i.e. the substitution effect).
- The target for the result indicator “Additional annual number of visitors in supported attractions (500 thousand) has been exceeded: it was nearly 900 thousand in 2014. However, the data reliability makes the result questionable. Project beneficiaries have provided in their reports data from different sources (the attractions operators, local authorities, regional statistical offices, tourism associations, etc.) without any guidance, common methodology for different types of attractions or ongoing verification by the managing authority.
- The target for the result indicator “Visitors’ satisfaction with attractions and information services” (80%) has been exceeded. In 2014 the satisfaction with attractions measured as the sum of very positive and positive assessments was 97%, while the satisfaction with information services was lower; it was 86%. The quality of information materials received the lowest score.

#### **4. Key problematic areas and gaps in the EU funds absorption**

The above presented facts and figures make it clear that Operation 3.1 dedicated to tourism attractions enhancement within OPRD 2007-2013 was able to absorb its financial allocation. Significant number of attractions was developed and it could be expected that many of them will have an impact on changing the structure of tourism development in Bulgaria. However, significant doubts are raised regarding the “qualitative” absorption, because it is not only important that the money be simply absorbed within the fixed timeframe and formal rules and requirements but also that the funds are utilized in an effective and efficient way. The problematic areas and gaps could be summarized in several groups following the Program and the project cycle

(Table 4).

**Table 4.** Problematic areas and gaps in the EU funds absorption

Problematic area	OPRD 2007-2013 gaps	Intentions for OPRG 2014-2020 (Partnership Agreement, 2014)
Programming	<ul style="list-style-type: none"> <li>• Midterm change in the scope of eligible municipalities, allowing the most developed municipalities to be funded</li> <li>• Financial resources for tourism were significantly reduced</li> </ul>	<ul style="list-style-type: none"> <li>• To finance a limited number of pre-defined cultural, natural and religious sites forming regional products and having bigger potential for attracting tourists and generating growth and employment</li> </ul>
Sites selection	<ul style="list-style-type: none"> <li>• Lack of assessment and pre-selection of sites in terms of strategic location, attractiveness and uniqueness</li> <li>• Similarity of selected attractions and projects</li> </ul>	<ul style="list-style-type: none"> <li>• Focus on priority sites: pre-selected among 1400 cultural heritage sites of world and national importance and 25 natural landmarks with potential to attract tourists</li> </ul>
Grant scheme design and project selection	<ul style="list-style-type: none"> <li>• Support was provided to relatively small projects</li> <li>• Lack of flexibility regarding the projects duration depending on size and complexity</li> <li>• Project assessment criteria were not precisely defined</li> <li>• Environmental and social sustainability were not included in the assessment criteria</li> <li>• High weight of the price criterion in the selection of contractors</li> <li>• Lack of expertise and capacity of the evaluation committees</li> <li>• The two-stage selection procedure was applied for the first grant scheme only and later abandoned</li> </ul>	<ul style="list-style-type: none"> <li>• Integrated projects will be supported involving integrated solutions for preservation and conservation of the heritage site, its promotion and development</li> <li>• Grant support will be combined with financial instruments at project level</li> <li>• Sustainability implications will also be taken into consideration to prevent threat for cultural heritage</li> <li>• Necessary expertise in the field of cultural heritage will be required from the respective financial instrument with regards to project selection</li> </ul>
Project design and implementation	<ul style="list-style-type: none"> <li>• Imperfect design of the terms of reference</li> <li>• Poor project design leading to loss of authenticity and public criticism</li> <li>• Public discussions were not particularly required and carried out in advance</li> <li>• Project implementation was often delayed as a result of unrealistic planning</li> </ul>	<ul style="list-style-type: none"> <li>• Specific monitoring and control on implementation of the specific conservation and restoration activities will be ensured to guarantee the compliance with issued permits and regulations</li> </ul>

Project (and Program) evaluation	<ul style="list-style-type: none"> <li>• Ongoing evaluation of the Program was initially envisaged including respective methodology but most of the evaluations were not carried out</li> <li>• Inappropriate selection, specification and use of indicators for the evaluation of project outputs, results and impacts</li> </ul>	
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In terms of their nature the identified gaps could be classified as follows:

*Not knowing the real demand for heritage-based tourism, lack of strategic thinking and midterm change in the philosophy of the Program.* In 2010 the territorial scope was expanded to include the most developed municipalities with seaside and mountain resorts. Twelve of the funded projects (17%) using 26% of the financial resources were focused on already well-developed tourist municipalities. Financial resources in support of tourism were significantly reduced during the program implementation and were allocated to other priority axes: the initial budget for the whole priority was reduced from EUR 218 to 198 million, the contracted amount was EUR 137 million and the amount actually paid – EUR 133 million. For the Attractions Development Operation the initial allocation of EUR 153 million was reduced to a contracted amount of EUR 107 million while EUR 102 million were actually paid (a decline by 33%).

*Not selecting the right heritage sites to be supported.* Instead of pre-selecting a number of strategically located, attractive and unique sites to increase the number of visitors in the respective region and in Bulgaria as a whole, attractions that did not fulfil those requirements were supported which only complemented the existing tourism supply. Hence, significant displacement and/or substitution effects could be expected thus minimizing the overall impact on regional and national tourism.

*Not applying the appropriate grant scheme design and project selection.* The size of individual projects was limited to BGN 6 million (about EUR 3 million), thus preventing the implementation of larger projects with greater impact. Project assessment criteria were not precisely defined and required considerable tourism, heritage and design expertise to be applied. However, in most cases the evaluation committees did not have this expertise and the emphasis was put on budgets, procurement procedures, etc.

*Not delivering quality designed projects.* Many projects were criticized (after being completed) for their poor design, loss of authenticity and kitschiness, standing in contrast to the views of experts and/or local communities.

*Not matching performance to project proposals.* Quite often project implementation was delayed as a result of unrealistic planning (especially regarding public procurement), contested ownership and last but not least – the incompetence of

contractors. It resulted also from the high weight of the price criterion in the selection, pushing the applicants to compete on price being fully aware that the output could not be delivered in due time and/or with the required quality.

*Not matching the expectations to the achieved outputs, results and impacts.* Ongoing evaluation of the program was envisaged and a special ongoing evaluation plan was developed that included an evaluation of the impact of tourism projects as well as a methodology for evaluation of outputs, results and impacts of Program interventions. However, most of the evaluations have not been carried out and the opportunity for “learning” in the process of implementation and better preparation for the next programming period has been missed. Regarding the evaluation, the following observations of Mendez et al. (2011, pp. 98, pp. 104-105) seem to be both relevant and important to Bulgaria:

The new needs-based and flexible approach to ongoing evaluation in 2007-13 has led to wide variations in evaluation effort. Some Member States have set up an extensive evaluation plan covering specific policy areas as well as programs (...) but others have minimised their evaluation activity (e.g. Greece, Bulgaria, Cyprus and Slovakia) (...) impact analysis of interventions is underdeveloped. The scope for systemic learning, accountability and improvements in policy design is further hampered by the scarcity of public and high-level political debate about program achievements.

The analysis and the experience in the 2007-2013 period showed that more focused absorption of funds for the creation of completed competitive tourist product is needed to avoid partial financing of a large number of attractions and scattering the resources among a lot of objects of the same type. But in contrast with the good intentions to avoid the identified gaps presented in Table 4, the Operational Program “Regions in Growth” (OPRG) 2014-2020 (approved in 2015 but not launched yet) seems to repeat or magnify some mistakes from the previous period, for example:

- The Program is completely incomprehensible for anybody outside the program management community. This could be compensated through the Guidelines for applicants document, however, previous experience indicates that this is doubtful.
- The program is focused on cultural tourism and cultural heritage only but does not clarify the territorial scope and whether intangible cultural heritage could be involved. The Program states that “isolated or difficult to access sites without the potential to attract tourists will not be funded” but it does not even consider other aspects of attractiveness, such as the site’s cultural, historical or natural value, uniqueness, physical condition, services provided, etc.
- A special task force was established in 2013 for the pre-selection of projects but it substituted the European Commission’s recommendation to emphasize on pre-defined projects and focused on pre-selecting attractions (sites). It appointed all 165 sites in the national cultural heritage list with world and national importance as eligible for support. Such an approach did not consider important aspects such as real project demand (from potential beneficiaries),

- ownership, project preparedness, etc.
- The program repeats the eligible activities from the 2007-2013 period, trying to combine in an extremely inconsistent way the previous two operations related to “enhancement of attractions” and “regional product development and destination marketing” (e.g. landscaping activities are combined with impact assessment, visitor surveys, development of marketing and promotion strategies, etc.). The only “innovation” is the option to support small scale income-generating activities in a cultural site’s vicinity (accommodation, catering, recreational facilities, etc.) by using “financial instruments”. Concerns are raised regarding public ownership of heritage sites and the possibility of public bodies’ involvement as well as the ability to cope with the complexity of financial instruments without specific capacity development measures.
  - The only result indicator is “Internal tourism consumption”, which is difficult to measure and interpret, and by no means could be regionalized; in addition, very small increase is envisaged – EUR 37 million (from EUR 3,663 million to EUR 3,700 million). Two output indicators are defined that seem not to be well specified and are probably not measurable: 1) “increase in the expected number of visitors to supported sites of cultural and natural heritage and attractions”, and 2) “developed tourist products for cultural heritage of national and world importance”.

## Conclusion

Based on the above analysis it could be generally concluded that during the first period of Bulgarian EU accession (2007-2013) the country’s administration was successful in EU Funds absorption with reference to budgets and administrative procedures. However, it was not successful enough in terms of “qualitative” absorption, mainly due to the lack of strategic thinking and insufficient capacity of both the managing authorities and the beneficiaries. This is particularly valid of heritage tourism attractions that have never been better funded in Bulgaria.

Although the specially designed within the OPRD (2007-2013) Operation 3.1 was able to fully absorb its allocation through the support provided to a significant number of heritage sites, the projects impact was doubtful in terms of tourism policy strategic targets, especially regarding the spatial structure of tourism. There were significant gaps not as much in the Program logic and philosophy but in the design of the grant schemes and the procedures of project selection and implementation. Unfortunately, the opportunity to learn lessons from the implementation of the Program was missed, which poses significant challenges for the future.

The analysis of the Program shows that, in line with theoretical views, attractions are correctly regarded as the core of the complex tourism product that would be able to ensure the tourist experience. Furthermore, it is clearly understood that the creation of attractions in itself is not enough, they need to be adapted and promoted in order to attract visitors. At the same time, the nature of the tourist attraction is not strictly

defined and not enough attention is paid to important aspects of their development and management such as attractiveness, accessibility, authenticity and degree of commercialization. Assessing the appeal of attractions – their ability to attract visitors – is underestimated. Developing project proposals for tourist attraction is very often seen as a possibility simply for attracting financial resources to the municipality and infrastructure development.

In the current programming period (2014-2020) tourism is not a specific priority at the EU level (European Commission, 2012). This is reflected in the new Operational Program “Regions in Growth” in which the total financial allocation for tourism-related activities is reduced by 50% (EUR 100 million), however, the amount allocated for heritage-based tourism attractions development remains almost the same as for the previous period. Among the main reasons for this development are the conclusions of the European Court of Auditors stating that EU funded support to tourism projects across all member states was characterized by limited impact, isolated and not well-targeted interventions (European Commission, 2012) as well as the disputable “real” prioritization of tourism at national scale. Meanwhile, considerable negative attitudes towards tourism-supporting interventions have already appeared in Bulgaria while no change concerning the problematic approach to heritage attractions development is notable in the early phase of implementation of the new OPRG (2014-2020).

Hopefully, this time Bulgaria will be much more effective in the “learning by doing” process regarding the absorption of EU funds for development and marketing of successful and sustainable tourism attractions. Yet, the “learning by doing” approach will not eliminate the crucial need for strategic approach and better justification of interventions as well as for proper-timed monitoring and evaluation not only of the financial absorption, procedures and outputs, but also of projects’ results and impacts.

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