



Complaint¹ procedure

of the Interreg VI-A Romania-Bulgaria Programme in relation to the assessment of the Integrated Territorial Strategy

Article 1 (Scope of the complaint procedure)

1. These rules define the procedure for treating complaints against decisions taken by the Monitoring Committee regarding the assessment of the Integrated Territorial Strategy² and the invitation for selected project ideas to proceed to the second step (the development of the full application), following the prioritization by the Strategy Board. The purpose of the procedure is to ensure effective examination of complaints.
2. This complaint procedure does not address and cannot be used to appeal against the Strategy Board's own decisions on approving the results of the assessment and the ITS portfolio of project ideas.

Article 2 (Right to complain)

The interested parties may file a complaint against the decision of the Monitoring Committee. Within the scope of the current procedure, interested party may be:

- a. The Strategy Board, represented by both Co-Chairs, or
- b. lead partners who submitted concept notes, part of the List of project ideas recommended for funding under the Interreg VI-A Ro-Bg Programme (annex 1 to the Strategy Board Decision no. 17/30.09.2025) and which were subject of the assessment process of the Programme structures in-line with the provisions of *Considerations and Methodology for the assessment of the Integrated Territorial Strategy*. It is the task of the Lead Partner to collect and bring forward the complaint reasons from all their project partners, as the case may be.

Article 3 (Scope of the complaint)

The interested parties should refer to the Considerations and Methodology for the assessment of the Integrated Territorial Strategy approved by the Monitoring Committee and justify their complaint through explaining and demonstrating:

- a. why the Monitoring Committee decision does not correspond to the information provided within the Integrated Territorial Strategy and within the project ideas recommended for funding under the Interreg VI-A Romania-Bulgaria Programme and/or

¹ The term „complaint” should be understood as different from the term „appeal“. The term “complaint” refers to a procedure within the Programme which does not replace an appeal in a court of justice, but it may help to avoid such an appeal.

² The Integrated Territorial Strategy refers to Integrated Territorial Strategy for the Romania-Bulgaria cross-border area (ITS), as approved by the Strategy Board and published here: <https://interregviarobg.eu/sti1>.



- b. why the process failed to comply with specific procedures, indicating the exact rules which were, in their views, not respected. The interested parties should equally demonstrate through their complaint how the supposed procedural breach materially affected or could have materially affected the contested decision.

Article 4 (Lodging the complaint and formal requirements)

1. The complaint against the Monitoring Committee decision should be lodged in writing, by e-mail, within maximum 5 working days from the date when the notification about the assessment of the Integrated Territorial Strategy was sent to the interested party³, to the indicated email.
2. The complaint should include:
 - a. name of the interested party and/or of their representative(s);
 - b. clearly indicated reasons for the complaint (grounds), including proper justifications for each ground, in line and limited to those situations indicated under Article 3;
3. If the complaint does not contain any justification, if it does not refer to the Monitoring Committee decision or if it does not refer to the applicable rules, the complaint may be considered inadmissible and rejected.
4. The complaint may include relevant supporting documents, if needed. The supporting documentation shall be provided for the sole purpose of supporting the complaint and may not alter the quality or content of the assessed strategy or project ideas (no supplementary documents will be considered, other than the ones initially submitted together with the concept note or requested by evaluators during the assessment process).
5. During the examination of the complaint, only the grounds indicated as per Article 4.2.b will be taken into account.

Article 5 (Rejection without examination)

A complaint will be rejected without further examination if submitted after the deadline set in Article 4.1 or if the formal requirements set in Article 4.2 are not observed.

Article 6 (Handling and examination of the complaint)

1. The Monitoring Committee decides upon any complaint filed according to this procedure after considering the recommendations of the Complaint Panel, a group of experts specifically designated for the prior review of the complaint by the Head of the Managing Authority.
2. For each filed complaint, the Monitoring Committee adopts a *complaint solution decision*.
3. The Complaint Panel is tasked to review the complaint and to issue a written report containing its recommendations, which are not binding for the Monitoring Committee. The report is communicated to the Monitoring Committee together with the complaint and other relevant documents, as the case may be. For the purpose of performing its tasks, the Complaint Panel is granted full access to documents and it should examine any relevant document, including, without

³ The date of the communication is considered to be the date when the e-mail was sent.



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limitation: the complaint, the Integrated Territorial Strategy, the project ideas, and all their supporting documents, the record of the Monitoring Committee's decision, as well as and other documents related to the assessment of the Integrated Territorial Strategy.

Article 7 (Final Provisions)

1. The complaint solution decision should be issued within 45 days from complaint filing. In justified cases, the Monitoring Committee may allow more time for solving the complaint and the Joint Secretariat informs accordingly, in advance, the interested parties.
2. The complaint procedure and the summary of results of the complaint examination, adopted by the Monitoring Committee, will be published on the official website of the Programme - www.interregviarobg.eu.