



**“GREENING SOCIAL HOUSING IN
VARAŽDIN, CROATIA”**

ACTION PLAN FOR VARAŽDIN, CROATIA

March 2019

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List of Abbreviations

DHW – domestic hot water

ERDF – European Regional Development Fund

ESI fund – European Structural and Investment Funds

EU – European Union

FP – financing period

IP – Investment priority

IPCC – Intergovernmental Panel on Climate Change

CF – Cohesion Fund

LSG – Local Stakeholder Group

MA – managing authority

ROP – Regional Operational Programme

OPCC – Operational Programme „Competitiveness and Cohesion“

POS – State-Subsidized Housing Construction

REA North – Regional energy agency North

Introduction

According to the Intergovernmental Panel on Climate Change (IPCC), the building sector has the highest potential to reduce energy use (and resultant carbon dioxide emissions) at the lowest cost. For example, in Croatia, most of the housing stock was built before 1987, which means they do not even meet current basic technical regulations and have poor if any, thermal insulation. As a result, these types of buildings typically require over 200 kWh/m² of energy. If compared to a normal standard of modern construction with less than 100kWh/m², or with low energy houses with less than 40 kWh/m², energy reduction potential is evident.

During the transition in the 1990s, the Croatian social housing sector was almost completely transformed. In the socialist era, most of the multi-apartment building stock was social (owned by the state) and after 1990, the State decided to offer citizens living in apartments to buy them under more favorable conditions. That move caused a dramatic decrease in the number of social housing units and leaving social housing to be the sole responsibility of local authorities. Nowadays, social housing in Croatia is characterized by apartments scattered in numerous buildings and only sporadic cases of buildings entirely dedicated to social housing. The situation, where the building is owned by many private owners and decision on investments in building (especially energy retrofit projects) needs to be made by the majority of owners is in many cases prohibitive thus resulting in a low ratio of retrofitted buildings.

The aim of greening the social housing sector, as part of the building sector, is not only to reduce energy use and thus GHG emission but also to improve general health conditions of the social housing residents. Within the framework of the Social Green project (Regional Policies towards Greening the Social Housing Sector), this action plan was developed to fulfill the main objective of the project – the improvement of energy efficiency in the social housing sector through mutual learning and development of improved regional policies. In the development of this action plan, various stakeholders have participated (from the local to the national level) who deal, directly or indirectly, with social housing sector whether they participate in the retrofitting process of building stock, policy-changing or managing the social housing stock. Inputs from project meetings with other Social Green partners and the overall interregional learning process have provided useful knowledge and ideas which REA North has used and addressed in local stakeholder group meetings.

This document is divided into two major parts, **Background**, with sections: (1) policy instruments addressed by REA North, (2) interregional learning and involvement of local stakeholders, (3) SWOT analysis for greening social housing, (4) the key findings from self-assessment report related to retrofitting social housing sector, (5) identification of available and/or expected financial resources for implementation of actions, and the second part, **Actions**, containing several sections, i.e. actions: (1) Action 1: Improving the program of retrofitting family houses (with additional criteria related to social housing), (2) Action 2: Improving the program for energy retrofit of multi-apartment buildings and (3) Action 3: Improving the existing policies on State-Subsidized Housing Construction and developing new policy instruments.

Background

According to the European Social Charter, EU member states have an obligation to provide their citizens with universal access to decent and affordable housing. In general, social housing implies solving housing issues for the most vulnerable groups. Lately, the term refers to providing adequate housing for all vulnerable groups who have no adequate housing conditions and are unable to provide them under market conditions. Green retrofit of the social housing sector has been proven to contribute to the achievement of the EU 2020 and 2030 goals and stimulates employment, social inclusion and directly reduces energy poverty.

The Social Green project is oriented to jointly tackle the topic of housing deprivation and energy efficiency in the scope of the social housing sector towards a low carbon economy. The overall objective of the project is to improve existing national and regional development policies oriented to the promotion of greening the social housing sector, through the enhancement of energy efficiency and use of renewable energy sources providing at the same time a healthy and sustainable environment for all citizens. The focus of the project is also on interregional cooperation where regions identify, share and transfer innovative methodologies, processes and good practices in developing and implementing greener social housing sector policies, targeting new constructions or retrofitting existing buildings.

In this context the project's sub-objectives were:

1. To understand the role of the green building intervention in the social housing sector and the link with the energy poverty.
2. To identify measures for greening the social housing sector.
3. To identify, share and transfer experiences and good practices.
4. To develop strategic guidelines and policy instruments recommendations as an integrated toolkit for regional and local authorities, fostering greening the social housing sector, oriented to new and retrofitting existing buildings.
5. To improve national/regional/local policy instruments by introducing best practices into EU mainstream programmes in order to contribute towards fostering the competitiveness, sustainability and social cohesion of cities, regions and the EU.

Policy instruments addressed

The main objectives of the Operational Programme "Competitiveness and Cohesion" 2014 – 2020 (OPCC 2014 – 2020) are to boost economic competitiveness, support alignment with the EU environmental acquis, invest in transport and network infrastructure. The EU allocation for the programme period 2014 – 2020 amounts to 6.8 billion EUR (4.3 billion from the European Regional and Development Fund (ERDF) and 2.5 billion from the Cohesion Fund (CF)).

One share of the ERDF allocation is allocated to priority axis related to this action plan – investments in the development of energy efficiency in public buildings and housing, as well as the production of renewable energy resources at the local level – with total of 531 million EUR. Specific actions included in this action plan have set under the investment priority 4c “Supporting energy efficiency, smart energy management and renewable energy use in public infrastructure, including in public buildings, and in the housing sector”, for which allocated funds amount 411 million EUR. At the moment, there is no special allocation of the funds exclusively for greening the social housing sector, but specific actions can be financed through latter investment priority.

Existing framework for retrofitting buildings includes only one “social” criterion – the development index of the local authority where a building is located (the most underdeveloped areas will get double as big support as the most developed areas). Other criteria related to social housing are still not recognized. What needs to be considered is that a large share of the social housing stock is in fact in developed areas and owned by local authorities and thus are not specifically classified for any financial support. In order to overcome this issue, there is a need for establishing additional criteria that will better address social housing stock owned by local authorities and increase the budget for its retrofitting. The latter has been selected as the self-defined performance indicator of this action plan.

The improvements of existing policy instrument proposed by this action plan are mainly focused on facilitating the retrofit of the social housing sector by their inclusion in current and upcoming programmes for both family houses and multi-apartment buildings and increase the number of retrofit projects funded from investment priority 4c and supporting the achievement of defined goals of the programme.

Interregional learning and local stakeholder involvement

The development of this action plan was based on the interregional cooperation between partners of the Social Green project as well as the participation of various stakeholders both from the local and national level working, directly or indirectly, with the social housing sector.

Interregional cooperation enabled Social Green partners to identify, share and transfer knowledge, good practices, and innovative methodologies to develop and implement greener social housing policy instruments, either to construct new or retrofit existing building stock. Activities conducted under the principle of interregional cooperation are:

- (1) Interregional learning events, held in Matosinhos (Portugal, 25th-27th October 2016), Mizil (Romania, 25th-27th April 2017), Varaždin (Croatia, 26th-28th September 2017), Tartu/Tallinn (Estonia, 16th-17th January 2018) and Alba Iulia (Romania, 12th-13th June 2018), and have comprised presentations of local social housing initiatives, study visits to retrofitted social housing buildings and good practices workshops.

- (2) Good practice examples of public interventions in the social housing sector which have been carried out in each project partner's country, whether on a local, regional or national level. After the identification of these good practices, focused mainly on the greening of the social housing sector and financing mechanisms, they have been submitted and published on the Policy Learning Platform of the Interreg Europe's programme website.

Besides interregional cooperation, the major role in sharing knowledge and experience played the representatives of local, regional and national level who were part of **Local Stakeholder Group (LSG)**, established right after the beginning of the project. LSG members included representative of the Ministry of Construction and Physical Planning that acts as the policymaker for energy retrofitting of entire building stock and directly influences the MA of OPCC 2014-2020, as well as other ministries who are, directly or indirectly, connected with social housing issue (Ministry of Demographics, Family, Youth and Social Policy and Ministry of Environmental Protection and Energy). Furthermore, the responsible body for allocation of the EU funds based on public tenders (Environmental Protection and Energy Efficiency Fund) also participated as an active member of LSG. Technical and scientific expertise in social housing stock, as well as good practice examples, were provided by several institutions: Society for Sustainable Development Design, Croatian Green Building Council and Agency of Transactions and Mediation in Immovable Properties. In order to investigate the real situation in the social housing sector, City of Varaždin, as a bright example of social housing in Croatia, was also included in LSG. For the purpose of managing social housing stock in their jurisdiction, the City of Varaždin established a company named Public Institution „City Apartments Varaždin" whose representatives were members of LSG. ZTB Stan Ltd., one of the companies that also manages a large portion of multi-apartment building stock including buildings with social apartments, was also part of this group.

The main goal of forming such diverse group was to identify problems related to social housing in Croatia, both at the national and local level to see the biggest obstacles in managing the social housing stock as well as retrofitting it. To overcome such obstacles, existing good practice examples from Croatia and other EU countries were presented as potential solutions that can be transferred to the national or local level, mainly related to changing existing policy instruments to facilitate the retrofit of the social housing sector. Based on identified problems and good practice examples, LSG members suggested several solutions that can be transferred to Croatian policy instruments which are, in the end, included in this action plan.

The importance of the social housing topic was also recognized by the Ministry of Construction and Physical Planning. The Ministry established a national expert working group to address energy poverty issue and how to include energy poverty in existing and upcoming policy instruments. Members of the Social Green LSG were invited to join this working group and have the opportunity to address social housing challenges.

Except for organized LSG meetings, REA North collected some good practices and knowledge by participating in several meetings with social housing topic outside the framework of the Interreg Europe programme:

- (1) Social housing concept in the City of Zagreb, roundtable, 2017.
- (2) ManagEnergy Expert Mission, meeting of energy agencies from Croatia and energy agency from Ireland, discussion about energy retrofitting social housing in Ireland and Croatia.

Key findings from the self-assessment

Self-assessment report was used to collect data and knowledge about the state of the social housing sector in Croatia. The report was drawn up in close cooperation with local stakeholders in order to access important data and information they have while simultaneously increasing their awareness of the state of social housing in the country.

Currently, there is no clear definition of social housing in Croatia, only individual definitions given by local authorities. They classify social housing as the form of housing intended to the people who cannot afford the housing without additional financial support. It is usually the case that each local authority defines its own criteria for social housing. The criteria typically include the length of the residence in the local authorities' jurisdiction area (e.g. 10 years min.), that the residents do not own another property eligible for living, and that their monthly income does not exceed the amount which guarantees them financial assistance (defined by the Law on social welfare) etc. Other criteria that could be considered include the length of the work service, status of a single parent, percentage of physical/mental disability, participation in the Homeland war etc.

The physical characteristics of social housing vary from area to area, but generally, there aren't many social buildings dedicated only for socially vulnerable citizens. Usually "social apartments" are part of "non-social" buildings or a public non-residential building. While this creates a significant challenge in terms of initiating retrofitting projects using public funding, good practices have been identified in the Social Green project, including Region Norte in Portugal and Tartu, Estonia where local and managing authorities found ways to retrofit buildings with mixed ownership.

In terms of the energy retrofit, there aren't any "special" criteria defined for the social housing (e.g. higher subsidy ratio for social apartment buildings or buildings with social apartments), putting social buildings as well as their tenants in the same position with privately owned buildings/apartments. Cases where social apartment buildings are stand-alone (not a part of the non-social area) can be found in cities of Varaždin and Križevci where local authorities have more possibilities to influence the energy retrofitting process.

Besides the social buildings, there are some other forms of subsidized housing construction which provides affordable housing (mainly) for young families. Although they are not intended for the

socially endangered citizens, their business model or experience could under conditions be replicated on the social housing sector.

Local Strengths, weaknesses, opportunities & threats (SWOT analysis)

The information given in this SWOT analysis is related to the current situation in the city of Varaždin because this action plan is made for the mentioned city.

Strengths	Weaknesses
Local authorities usually have dedicated organizational unit for management of its social housing stock	Local authorities' budget is not enough for energy retrofitting of complete social housing stock
Policies and policy instruments related to social housing including the energy retrofitting exist	Most tenants of social apartments are not familiar with the term energy efficiency and rational usage of energy
Policy instrument(s) for energy retrofitting of multi-apartment buildings consisting of individual social apartments exist	Energy bills of social apartments are in many cases paid by local authorities
	Social apartments scattered in many multi-apartment buildings prevent local authorities to retrofit its social housing stock
	Legal framework and lack of consistent tools to enforce its social housing policies

Opportunities	Threats
The inclusion of additional criteria into existing energy retrofitting programs to boost investments in social housing stock	Imprecise definition of social criteria
The establishment of a compulsory education system for potential beneficiaries of social housing	Geographical imbalance of social housing policies – national focus on energy retrofitting in underdeveloped regions
Consolidation and exchange of data between state institutions and local authorities to prevent fraud	Unequal local social housing policies that could lead to a more financial burden for local authorities with more favorable social housing conditions (migration to cities with better social housing conditions)
Improvements in asset management policies to reduce the number of scattered social apartments and aggregation thereof.	No (further) development of national policy instruments related to the social housing sector
	Further reduction of local authorities' revenues by changing national tax policies
	No consolidation of existing or no development of new data to prevent fraud in entitlement to use social housing

Financial resources

It is most common that multiple funding sources will be used to complete a project. For example, a local authority will typically use a portion of its own funds, which in fact is mandatory for obtaining Operational Programme (OP) funding (the Social Green project fundamentally aims to develop action plans for implementing OP funds to improve social housing in the partner regions). They could combine these resources with available European or national funds, which may or may not flow through OPs, and could take the form of grants or other funding schemes, such as preferential loans administered together with national or European lending institutions. A key point in this connection, however, is the role of the local authorities, which commonly are responsible for owning and managing the social housing stocks in their jurisdiction. Therefore, local authorities are a key broker in the process of developing and implementing green social housing projects.

Objectives and Actions

Social housing sector in Croatia has been completely transformed during the 1990s and only a fraction of social housing stock has remained in the ownership of local authorities, mostly in the form of apartments scattered in numerous buildings. There are only isolated examples of (well) organized social housing where local authorities decided to build new dwellings to meet social housing needs on their territory. Hence, the existing policy instruments do not specifically address the social housing sector, but they also don't significantly restrict social apartments (or buildings) to be included in the energy retrofitting projects (exemption includes social family houses as part of the social housing stock which is not addressed in existing instruments). Learning from other partner countries in the project where significant progress in the greening of existing social housing stock has been made thanks to the stronger emphasis on social housing and declaring social housing as a specific category in policy instruments, it was clear that Croatian policy instruments need to address social housing stock as its explicit part.

This section contains all relevant information about proposals for changing existing policy instruments (namely existing and upcoming calls within OPCC 2014 - 2020) to facilitate retrofitting social housing sector and constructing new social buildings.

Objective	Action
<p>Objective 1: Improving policies for social housing in Croatia, particularly by multi-level governance approach where local, regional and national bodies cooperate to achieve defined goals.</p>	<p>Action 1: Improving the program of retrofitting family houses (with additional criteria related to social housing)</p>
	<p>Action 2: Improving the program for energy retrofits of multi-apartment buildings</p>

	Action 3: Improving the existing policies on State-Subsidized Housing Construction and developing new policy instruments
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Actions

Action 1 Improving the program of energy retrofitting of family houses (with additional criteria related to social housing)

1. The background

Social housing stock owners (mostly local authorities) from Croatia, wishing to obtain EU support to develop their retrofit projects, have to apply to tenders launched by Managing Authority of OPCC 2014 - 2020. In all so far open national funded tenders, local authorities, as owners of houses intended for social housing, did not have the opportunity to apply for national funds for energy retrofitting because of the policy instrument eligibility rules that ruled out local authorities as owners of family houses.

Even though there were no many good practice examples from interregional learning regarding this particular action, mostly because most of the partners' countries (including other EU countries) do not have single-family houses intended explicitly for social housing, the need for further development of this action was emphasized during interregional learning events.

At several LSG meetings, held in Croatia, the need for improving this policy instrument by including additional criteria have been expressed by several group members. Even though this particular program already contributed to reducing energy consumption in housing stock, it does not apply on part of the social housing stock. Another issue is the lack of structured data on single-family houses stock for social housing purposes in Croatia and the estimation of financial resources required for retrofitting. LSG members eventually concluded that there is no need for a new program for retrofitting of "social single-family houses" but additional criteria should be incorporated in an existing program.

2. Action details

This action addresses the upcoming public call expected to be open later this year. The upcoming public call will be part of the OPCC 2014-2020 and it is the plan to include social family houses to be eligible for a subsidy.

The main focus of the action is related to the application process issues that exclude public bodies that own houses intended for social housing, whose retrofitting would significantly reduce the cost for heating/cooling, domestic hot water usage (DHW), electricity etc. This action does not contribute to increasing the financial envelope under OPCC 2014 – 2020 but proposes changes in the distribution of existing resources.

The implementation of this action directly affects the policy instrument addressed by Social Green project (OPCC 2014 – 2020.). By changing this level and allowing public bodies to apply for tenders, a number of social housing units could be retrofitted what ultimately leads to a more energy-efficient social housing sector as well as the reduction of energy consumption.

For the implementation of this action, it is necessary only to incorporate additional criteria for social housing in the existing policy instrument in order to extend the list of eligible beneficiaries who want to retrofit their home or homes in their ownership.

3. Players involved

Ministry of construction and physical planning

- Including criteria for social family housing stock in policy instruments.

Environmental Protection and Energy Efficiency Fund

- Support the responsible ministry in adjustment/development of the policy instrument by providing information and experience from previous programs for energy retrofits of the housing stock.

Regional energy agency North

- Proposing and elaborating actions to initiate changes to existing policy instrument(s) to relevant stakeholders, primarily the Ministry of Construction and Physical Planning.

Local authorities

- Providers of relevant info related to the social housing sector.

4. Timeframe

June/July 2019 – December 2020

5. Costs and funding

The nature of this action is amending the existing policy instrument (OPCC 2014-2020) and influence on policy instruments for next programming period to facilitate the retrofit of social housing stock owned by public bodies and all costs incurred through the implementation of activities should not incur additional costs or funding but merely change distribution of existing available funds.

Funding sources

OPCC 2014 – 2020

Local authorities' budget

6. Success criteria/result indicators

Additional social criteria added in the future public calls in order to co-finance the energy retrofit of the social family houses owned by the local authorities.

Action 2 Improving the program for energy retrofits of multi-apartment buildings

1. The background

A significant proportion of multi-apartment buildings in Europe were built in the 1970s and 1980s. Today, many of them require significant retrofits. The retrofitting of such buildings, including the required improvements in energy efficiency, may present challenges, especially due to the:

- Lack of available funds for retrofitting the social building sector (Portugal, Spain, and Croatia).
- Need for substantial upfront financial effort for retrofitting social housing sector (Estonia and Romania).
- Mixed ownership of the building (Croatia, Spain, Portugal).

As one of the solutions stand out Estonian support scheme, managed by national financing institute KredEx, which is a combined grant and loan scheme that is being administered using funds from the Estonian ROP in order to support retrofitting in existing building stock. The scheme is open to homeowner associations in multi-apartment buildings as well as local authorities, provided that they own more than half of the apartments in the building. On the other hand, the urban regeneration of Villa d'Este in Portugal is an example of the sustainable development measures implemented by the Municipality of Gaia. This retrofit focused on the buildings owned by both the municipality and individual private owners. The project was financed by the "ON.2 – North Regional Operational Programme (QREN)", within the framework of the program "Cities Policy - Partnerships for Urban Regeneration". The combination of social inclusion and EE measures were an important focus for transferability for other municipal and governance structures, due to their relevance under the EU policy framework that considers the need for energy efficiency policies combined with social policies to fight energy poverty.

Moreover, particular challenges related to retrofitting social housing stock have also been identified in LSG meetings organized in Croatia. Members pointed out the need for retrofitting social housing stock since it is generally in bad condition and consumes a lot of energy. Furthermore, the LSG members discussed that the point is not to exclusively prioritize social housing stock over the rest of the housing stock, but to prioritize the retrofits of multi-apartment buildings with mixed ownership to prevent social deprivation by direct involvement of local authorities in supporting investments that resembles the local authorities' ownership share.

2. Action details

This action aims to boost energy retrofit of multi-apartment buildings containing social apartments by changing (existing) policy instruments (OPCC 2014-2020) through defining and adding criteria to upcoming public calls related to the existence of social housing units in such buildings.

For the implementation of this action, it is necessary only to incorporate additional criteria for social housing in the existing policy instrument in order to extend the list of eligible beneficiaries wanted to retrofit their apartments as part of multi-apartment buildings.

3. Players involved

Ministry of construction and physical planning

- changing existing policy instruments.

Environmental Protection and Energy Efficiency Fund

- Support the responsible ministry in adjustment/development of the policy instrument by providing information and experience from previous programs for energy retrofits of the housing stock.

Regional energy agency North

- Proposing and elaborating actions to initiate changes to existing policy instrument(s) to relevant stakeholders, primarily the Ministry of Construction and Physical Planning.

4. Timeframe

January 2019 – December 2020

5. Costs and funding

The nature of this action is amending the existing policy instrument (OPCC 2014-2020) and influence on policy instruments for next programming period to facilitate the retrofit of social housing stock owned by public bodies and all costs incurred through the implementation of activities should not incur additional costs or funding but merely change distribution of existing available funds.

Funding sources

OPCC 2014 – 2020

Local authorities' budget

Success criteria/result indicators

Emphasize (explicitly mention) the acceptability to retrofit social housing sector as well as the apartments that are the part of non-social multi-apartment buildings.

Action 3 Improving the existing policies on State-Subsidized Housing Construction and developing new policy instruments

1. The background

State-Subsidized Housing Construction (POS) is the national program aimed to help families to purchase a dwelling according to defined criteria. This model is available to all citizens of the Republic of Croatia with the purpose of solving their housing needs, and also to all local authorities and other legal entities with headquarters in the Republic of Croatia.

Regardless of the POS programme, Croatia does not have any acts or existing policy instrument in OPCC 2014 – 2020 that consider the retrofits of existing and/or development of new social housing stock. For example, Region Norte's (Portugal) ROP – Norte 2020 – includes investment priority 4c (IP 4c), which stipulates that public authorities can apply for funding to conduct energy efficiency upgrades to public buildings. For social housing, this is offered in Objective 3.2.2 (support for energy efficiency, intelligent energy management and renewable energy for social housing) through a grant covering 85% of the total cost of the project.

The lack of a dedicated legal framework for social housing was also the topic discussed widely on LSG meetings held in Croatia. This is one of the main reasons why social housing is not specifically addressed in policy instruments in Croatia. LSG members agreed that the abovementioned legal framework could be improved to address social housing stock as well as the process of its retrofit. Although this is not a prerequisite for greening the social housing stock, it would improve the process of development and retrofit in various ways. Social housing would be addressed in a legal framework and thus policy instruments would be easier to develop and implement whereas the implementation would be facilitated by the existing institution with vast experience and capacities.

2. Action details

This action aims to provide directions for possible amendments of named Act. The intent of such amendments is to facilitate and support the construction of new social buildings. More specifically, the idea is to encourage local authorities to invest in the construction of new social buildings. As a complementary source of funding, relevant ministries could propose an allocation of a certain amount of money in ESI funds, particularly the Cohesion Fund through new policy instrument.

The construction of the new social building is based on a strategic document, containing information about current needs for constructing new social buildings as well as the number of the interested local authorities to participate in this activity.

The tasks involved in the implementation of this action are:

- (1) Identification of the current needs for the construction of new social buildings.
- (2) Collecting information about local authorities' interest.

- (3) Preparation of the strategic document (situation analysis) containing all information about social housing stock in Croatia.*
- (4) Assess how many funds should be allocated for constructing new social buildings.

3. Players involved

Ministry of construction and physical planning

- Defining a new policy instrument.
- Development of national analysis on social housing stock and plan for greening the social housing sector.

Environmental Protection and Energy Efficiency Fund

- Support the responsible ministry in the development of the policy instrument by providing information and experience from previous programs for energy retrofits of the housing stock.

Local authorities

- Cooperation with relevant ministry regarding the identification of current needs by providing necessary data.
- Establishing local policy instruments for the construction of new social buildings.

Regional energy agency North

- Proposing and elaborating actions to develop a new policy instrument to relevant stakeholders, primarily the Ministry of Construction and Physical Planning.

4. Timeframe

June 2019 – December 2020

5. Costs and funding

Estimated costs for preparation of the new strategic document (situation analysis) is 100,000 €. The budget needs to be planned in a relevant ministry.

The funding required for construction of new buildings will be defined in the abovementioned document and will be the basis for the next FP of the ESI funds (e.g. Cohesion Fund).

Funding sources

ESI funds (Cohesion Fund)

Local authorities' budget

Success criteria/result indicators

* The strategic document will be the basis for changing addressed policy instruments or defining new

Launching discussion related to new policy instruments and creating the document that precedes new policy instruments.