

Initial developments in the CLLD approach in nine urban communities in Romania

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Abbreviations

MA	Management authority
PA	Partnership Agreement
PA	Priority Axis
WB	World Bank
WSCC	Wide Selection Common Committee
RSCC	Restricted Selection Common Committee
CLLD	Community Locally-Lead Development
EFRD	European Fund for Regional Development
SIEF	Structural and Investments European Funds
ESF	European Social Fund
LAG	Local Action Group
AG	Application Guide
MRDPA	Ministry of Regional Development and Public Administration
MEF	Ministry of European Funds
SO	Specific Objective
NPRD	National Programme for Rural Development
OPHC	Operational Programme for Human Capital
ROP	Regional Operational Program
LDS	Local Development Strategy
EU	European Union
MUZ	Marginalised Urban Zone

Summary

Over the 2014-2020 programming period, Romania, along with other states, is implementing the tool known as CLLD (Community-Led Local Development), the aim of which is to develop marginalised zones and involves the mobilisation of disadvantaged communities and local organisations so that they can participate actively in the process of identifying and implementing projects designed to achieve this goal, through the creation of a local partnerships – the Local Action Group (LAG) and the implementation of Local Development Strategies (LDSs) adopted by participatory methods. At urban level, CLLD applies to marginalised urban zones in towns with more than 20,000 inhabitants.

The report is based on research carried out in the nine ROMACT communities: Câmpina, Focșani, Gherla, Medgidia, Râmnicu Sărat, Reșița, Săcele, Turda and Vulcan, from July 2019 to February 2020. It looked at the way in which the CLLD approach was prepared for in these communities, in particular whether community involvement was real, when the implementation phase began, and the challenges that the local public authorities encountered. Lastly, having regard to the framework outlined by the documentation concerning the allocation of European funds to support the CLLD approach (guidelines, guides, instructions issued by the MA OPHC or the MA ROP), recommendations were made on (i) how to improve the efficiency of the mechanism efficiency, and (ii) the quality of projects and the relevance of outcomes to the quality of life of marginalised persons.

As regards the main challenges reported at system level, the first part of the Report gives details of the **inconsistency between the legislation and the CLLD mechanism in terms of land use planning and town planning**, in view of the fact that the specific legislation clearly states:

- 1) that *responsibility for land use planning and town planning lies with the local and central public authorities* (Article 6 of Law 350/2001 as subsequently amended and supplemented);
- 2) *defining urban zones, including functional ones, within the reference territorial unit-zone-subzone system, as found in the General Urban Plan (GUP) in each Local Authority Area (LAA), is the responsibility of the local public authorities and not another created body, such as the LAG, even if the local authority is a member of the LAG;*
- 3) *it is the Local Council that co-ordinates and is responsible for all town planning activity pursued within the LAA and therefore for establishing Marginalised Urban Zones (MUZs) and the Functional Urban Zone (FUZ) at LAG level by way of a decision of its managing body without a mandatory request for a Local Council Decision, and the existence of associated land use planning and town planning documentation adopted at local level is a legal inconsistency that makes the CLLD mechanism vulnerable, complicates the process of developing and implementing projects, and impacts the sustainability of outcomes.*

The *inconsistencies between the housing-related documents in the CLLD mechanism and the existing legislative framework* are also reflected in the Report, as social housing beneficiaries must be persons within the target group, i.e. persons living in MUZs, as stated in the MA OPHC Guide. This is in a context where there is a legislative framework, which, though inconsistent (as outlined in detail in the Guide for local public authorities entitled “Criterii pentru atribuirea de

locuințe sociale” [Social Housing Allocation Criteria] published in 2019 by the ROMACT team), *drawing up the categories of applicants who are eligible for social housing and deciding on the criteria for granting/allocating such housing is the responsibility of Local Councils*. To ensure equal access to housing, social housing must be allocated on the basis of criteria adopted at local level and not on the basis of the criterion set in the guides to the CLLD mechanism, or persons living in MUZs.

The consequence of this inconsistency has also been reported in the field, i.e. the fact that migration of the target group has made it difficult to achieve the aims of the CLLD mechanism at urban level. The Report presents **migration** and **segregation** as two issues that are missing from the approach established in the mechanism created by the MA OPHC and the MA ROP, and the only recommendations made are based on the EC Guide “Guidance for Member States on the use of European Structural and Investment Funds in tackling educational and spatial segregation”.

The preparation and consultation processes were analysed in the field research, and *the short amount of time allocated for preparation – three months – was deemed insufficient for a proper consultation process*. There was also *inconsistency between the steps taken by the two management authorities involved*, i.e. the MA ROP and the MA OPHC, which led to a situation where, 18 months after the Local Development Strategy had been produced and more than 20 months following the community consultation, no Calls for projects had been issued. The interviewees gave details of the process of producing the LDS and the community consultation, which were carried out as per the guidance in the documents published in the MA OPHC Call. Civil servants at some town halls stated that the innovative nature of the type of measure laid down by the CLLD mechanism had slowed activity down. *The excessive interval between consultation and project implementation leads to a loss of community faith in the benefits of consultation and the fairness of the action taken*.

The way in which the Local Action Groups worked is analysed in the Report, and most of the interviewees felt that *the lack of financial resources and skilled human resources made it difficult for LAGs to operate*, with town halls having provided operating premises and equipment in many cases. *The relationship with the management authorities was considered to be difficult, with communication occurring late, without any real support, and the suggestions received were insubstantial, although they were improved over time*. The lack of skilled human resources meant that LAG members had to clarify the need for facilitators and experts to be trained on specialised courses, and the capacity to generate projects at local level was considered to be limited. With regard to infrastructure projects, problems were reported in relation to the inadequacy of the budget, which had been poorly estimated when the LDS was developed (also bearing in mind the fact that not even a minimal amount of technical and economic documentation was requested), and the excessive interval between the adoption of the LDS and the time when investments were made (LDS adopted in 2017, calls for investment projects issued in 2020, with probable completion in 2023).

In the field research, particular focus was placed on HOUSING and the SOCIAL ECONOMY, and *several possible challenges in the implementation of the LDS and project implementation* were identified:

- Demand exceeds supply, and disadvantaged persons made personal or household-related requests during the consultations;
- The need for decent housing is great, whereas the number of homes that can be built/renovated through CLLD is limited;
- Social housing allocation is an issue that is affected by mismatches (migration, segregation), and there needs to be a transparent process through which the criteria for selecting social housing beneficiaries at local level will be known (they require a far-reaching approach, to prevent discrimination and ensure equal access to housing);
- Issues such as relocation and eviction are not addressed, even though such situations do arise in the nine communities included in this Report;
- The social economy is not a mandatory component for all projects, and was proposed as a measure where it was identified during the process of preparing the strategy as a solution to expand and diversify economic and entrepreneurial activity at community level. One particular feature of the framework created by the MA ROP for the financing of social economy insertion enterprises is that it applies the territorial principle, and it maintains the type of legal entity and CAEN [National Economic Activities Classification] class for 10 years – *requirements which are difficult to meet.*

The Report's main conclusions are: **community animation** was a process that added value to the process of implementing the LDS, the major difficulty is the **long delay before starting to implement projects due to** internal procedures and the less than swift communication with the Management Authorities, and the lack of financial and human resources. The involvement of Roma communities in LAGs is significant in terms of both their number and the message that this conveys, and the added value of the CLLD mechanism proved to be significant for at least three reasons: the zones addressed by this mechanism are zones in which no other significant ROP-type projects have been implemented, the approach is comprehensive, and beneficiaries were involved in the process of planning interventions.

The recommendations made concern:

1. Housing

The criteria in the guides of the management authorities involved need to be made consistent with the legal provisions so that the way in which social housing beneficiaries in MUZs are selected will not contravene the legislation that establishes equal rights and uniform criteria for all citizens within the LAA, including the MUZ as part of the LAA.

The issue of housing is a complex one and should not be addressed solely from the perspective of activities that are eligible for funding. Local authorities should be encouraged to address the issue as a whole.

2. Making LAGs more efficient

The times taken to draw up planning documents (LDSs) should allow for proper consultation of the community, and a campaign to inform the whole community, at LAA level. LAG operating procedures should be evaluated and improved so that the duties and responsibilities assigned by the legislation are fulfilled. Increasing the level of expertise is essential to ensure that outcomes are sustainable and to carry out an evaluation of the implementation of the CLLD mechanism over the 2014-2020 period. Establish a system to monitor the entire process of developing and implementing the LDS in order to check whether there is (or can be maintained) a real balance of power within the LAG.

3. Strengthening local NGOs for better involvement in community life

Develop “small wins” support schemes for local NGOs so that the confidence in the consultation process that is generated will be maintained until implementation of the projects that are included in the Strategy and financed with European funds.

4. Data used

Create a system to collect and update the data used, having regard to the lengthy duration of the intervention and the migration of disadvantaged persons.

Carry out a detailed analysis of risks, including those relating to migration with effects on age groups.

5. Improving the CLLD mechanism

It is necessary to increase the importance of the **stage of animating** the target area, which must begin with providing information to the whole community/across the LAA so that the principles are understood by all persons, thereby reducing the risk of hostility later on. This can be done by giving the LAG more freedom to choose relevant activities, and relaxing the requirements laid down by the guide developed by the MA.

The relevant authorities must ensure that up-to-date data is available; it is therefore recommended that there be co-operation between MAs and the National Statistics Institute to ensure that real, dynamic data is available so that changes in migration and its effects can be monitored.

Make the requirements for the operation and development of the LAG flexible so that adequate human resources can be employed.

The LDS must reflect the problems and the solutions proposed for the MUZ as part of the LAA and not merely respond to opportunities to obtain financing available from European funds. This means that the MA should not ask solely for projects that can be financed through the ERDF-ESF mechanism to be included in the LDS or for outcome indicators imposed by the funder to be adopted.

Introduction

The ROMACT Programme has been actively operating in Romania since 2013, and its purpose is to support the local public authorities by addressing issues that disadvantaged communities are facing. The ROMACT programme within the CLLD mechanism is specifically interested in a series of common elements which interact between the two programmes, respectively:

- Encouraging dialogue between local authorities and representatives of the disadvantaged community;
- Establishment of a representative group within the community;
- Supporting local authorities with different professional development programmes in order to help address the issues they are confronted with;
- Creating a working/action plan and providing support for its implementation;
- Common areas of interest like improving living conditions and economic growth within the communities.

During the ROMACT Programme implementation, several weaknesses were identified at the local level which impede the community's sustainable development. These are: lack of knowledge or experience of human resources at the local level in regards to project design and implementation; limited representation of civil society organisation in poorer communities; a lack of community consultation upon the implementation of local development plans. All the points mentioned above are essential for successful CLLD implementation. This study analyses these aspects in nine municipalities which have been involved in the ROMACT process, bringing to light the weaknesses and challenges in the field and, as a result, formulating a series of recommendations to improve implementation of the CLLD mechanism in the following programming period commencing 2021-2027.

Methodology and challenges

The general objective of this study was to document the LAG consultation processes in order to make suggestions regarding efficient LAG implementation of the LDSs. Specific objectives identified were to support local public authorities (PLA) and LAGs for CLLD strategic implementation; identifying good practices - how CLLD strategy contributes to improved living conditions and the integration of the MUZ population; identifying changes which have occurred in the intervals between strategic elaboration and subsequent research in regard to the results; identifying the needs and challenges of LAG support in implementing housing measures; gathering data aimed at improving the living conditions in the ROMACT communities through CLLD strategic implementation and analysing the degree of Roma involvement within the LAGs.

The hypotheses were as follows:

- 1) The strategic elaboration process adhered to the Guide's instructions; however, the beneficiaries did not know which projects would be further developed and for whose benefit;
- 2) Consultation did take place during the initial elaboration of the strategy, however this process was rather formal and the results were more in alignment with the intentions of City Hall than that of the local communities;
- 3) Difficulties were noted in the CLLD implementation process, both at the administrative and social levels;
- 4) Communication within the GAL was not always efficient, especially in relation to the target group.

Qualitative research was conducted between July 2019 and February 2020 and comprised of two stages: Analysis of the ROMACT municipalities' LDSs and the semi-structured field interviews which applied to four types of participants, namely: LAG representative, City Hall representative, Roma community representatives and NGOs representatives within the LAG.

Among the LAGs, responses were very different, depending upon the relationship between LAG personnel and City Hall. Most LAGs and City Hall representatives in the LAG were transparent in answering the questions, offering information regarding how LAG functions. Others were rather reticent, whereby it was not possible to have discussions with other LAG members. The representatives of two LAGs, for instance, did not wish to be interviewed (one of these LAGs discussions were held with only Roma representatives).

An important feature identified since the beginning was that often, although the LAG is in fact an independent NGO, in reality, the mayor's approval was required before an interview could take place.

Quick overview of the CLLD mechanism

Out of 95 urban areas with more than 20,000 inhabitants (which, according to the World Bank's 2014 Marginalised Urban Zones Map, include 605 MUZ), only 49 cities and municipalities have been graced by an LDS elaborate and LDS', and out of these 49, only 37 have been approved for funding. These envisage interventions funded through PA9 ROP and PA5 OPHC for a total of 132 MUZ. The nine ROMACT municipalities with LDS' envisage interventions total 35 MUZ (only 26,51%), according to Annex 1.

The CLLD mechanism may be broken down into three stages, respectively:

- *Stage I. "LDS elaboration"* - finalised by the end of November 2017 by the LAG. This stage included:
 - Establishing an urban LAG/adapting the pre-existing LAG created according to CLLD requirements for the 2014-2020 programming period (which is now ending).

- Setting the limits of the MUZ and the LDS territory;
- Mobilising the local partners and the marginalised community as targeted by the LDS;
- Elaboration of LDS and of the indicative list of interventions by which the LAG determines local development strategies to be achieved.
 - *Stage II. "Evaluation and selection of SLD"* - conducted by the Wide Common Selection Committee with ROP member representatives. This process ended in December 2017 when the selected list of 37 LDS' was published (out of 49 strategies submitted) for funding through the PA9ROP - PA5 OPHC financial integration mechanism, (The list of LAGs and LDS' selected for funding through the PA9ROP - PA5 OPHC mechanism are presented in Annex 2).
 - *Stage III. "Selection and implementation of projects under the approved LDS"* - this stage was in preparation at the moment of writing this report). In April 2019 the Document regarding the "Selection Procedure Guidelines for LAG preparation of projects/fiches for projects and monitoring of the projects funded through AP9ROP - AP5 OPHC" was published. Projects selected by the LAGs will be approved by the Restricted Selection Common Committee. Moreover, OPHC signed funding contracts for the everyday functioning of LAG.

These three stages were analysed by taking into consideration the difficulties generated by the institutional structure at the national level, as well as limitations in relation to the local structural capacity.

Chapter 1: Challenges in CLLD mechanism implementation

1.1. Lack of legal correlation

a) Definition of terms (definitions of MUZ and FUZ)

In 2015, when the Applicant Guide was initially launched by OPHC, it is mentioned that the territory covered by the Local Development Strategy (LDS) must include the Marginalised Urban Zone (MUZ) and the Functional Urban Zone (FUZ) to which it belongs, the latter being explicitly defined as *“the area around/near a territory upon which a/the marginalised community is located, having unitary and functional characteristics from a social, economic, and demographic etc. point of view”*¹.

This definition used and imposed by the MA OPHC has no legal correlation with specific legal provisions already in place at the moment that the aforementioned Guide was approved, respectively Law 350/2001 regarding territorial design and urbanism, with its modifications and addendums. This law presents the definition of the **functional zone** as being *“the portion of a territory of a locality **where, through the documentation regarding territorial design and urbanism**, the existing and future dominant functionality may be determined. The functional zone may emerge from more areas with the same dominant function (outlying area, industrial activity area, green belt area etc.). Functional zoning consists of the action of dividing the territory in functional zones”*.²

Therefore, as identified in the Applicant Guide, the absence of complying with a compulsory aspect, according to Law 350/2001, respectively the compulsory mentioning of the FUZ in the documentation related to the territorial design and urbanism, correlated with a lack of legal compliance in regards to the legal attributions in this respect.

b) LAG assumed local public authority attributions, in regard to territorial design and urbanism

According to the provisions of Article 25 of Law 350/2001, with its further amendments, the Local Council is the entity that coordinates and is in charge of all activities related to urbanism in the entire administrative-territorial area and ensures the compliance with the officially-approved documents on territorial and urban development for a given locality and its component units (communes, towns, districts etc.). Functional zoning, in correlation with the organisation of traffic network (FUZ) is set up through the General Urban Plan (GUP), which is a document approved by the Local Council after being proposed by the mayor both in its initial form as well as in the form of amendments.

Without the compulsory provision of a prior Local Council directive, the LAG Board is unable to make any MUZ(s) and FUZ territorial decisions as covered by the LDS. Doing so would represent a legal breach insofar that the Local Council’s authority has made special allowances for territorial and urban planning by the LAG. The lack of requirements and directives from Local Council

¹ Applicant’s Guide - Tendering for project proposals no. 3/2015 “Support for community animation within cities with over 20,000 inhabitants”, Chapter 1.3, p. 31

² Law no. 350/2001 with amendments, Annex 2, p.70

Decision to LAG Board decision should not imply that the prevailing legal provisions should not be followed. However, in reality, in some cases local municipalities often lack adequate human resources in order to follow the processes and protocol, including in the legal field.

From the nine LDSs adopted at the community level as covered by this report, the LDS adopted by the “Unirea Focsani” LAG states that: *“the targeted territory in the Focsani municipality, delimited on the basis of the provisions of the General Urban Plan (PUG) of the Focsani municipality, refers to the territorial areas of reference (TAR) no.’s 12 and 21, identifying two zones heavily affected by poverty, marginalisation and social exclusion - * Bahne marginalised urban zone and the South marginalised urban zone, * ghetto type zones”*.³

c) Allocation of social housing

As presented in the ROMACT Guide for local public authorities, *“allocation of social housing is conducted within a legislative framework characterised by inconsistencies and dissociations, applied by the local public authorities and often resulting in instances of social exclusion and discrimination”*.⁴

In addition to the pre-existing difficulties, for which recommendations have been proposed in the aforementioned Guide, other issues have been generated by funding provisions and documentation requirements for the marginalised urban zones (including the nine ROMACT communities), with the following results:

- During the Stage III of the CLLD mechanism, the target group’s support is conditioned by the residence/domicile within the CLLD territory (MUZ and the respective functional urban zone). Persons from the marginalised communities, who have no ID cards, but nevertheless live on this territory, may represent the eligible target group only if, following a complex analysis at the community level, it can be proven that they do indeed live in that respective marginalised community which is at risk for poverty and social exclusion;

The ROP Applicant Guide⁵ underlines, as a condition for eligibility, the fact that the project implementation location shall be situated in an urban area with a population of over 20,000 inhabitants, within the functional territory of the LDS selected for financing, in the developmental region where the application was initially registered;

- According to the same Guide, social housing structures are eligible;
- One of the project indicators, regarding the implementation monitoring and investment performance as proposed by the project, refers to **persons living in urban areas where local integrated development strategies have been implemented (in accordance with the required number of persons)**.

³ LAG Unirea Focșani, Local Development Strategy p.3

⁴ ROMACT, Guidelines for local public authorities “Social housing distribution criteria” 2019, p.6

⁵ Priority Axis 9, Investment priority 9.1. for the PROJECTS regarding Local Development Strategies approved for funding within Human Capital Operational Program - HCOP - 2014-2020, FINAL VERSION, Bidding tender for three projects, 2019

Therefore, in the same context by which the amended Housing Law no. 114/1996 establishes the categories of eligible applicants for social housing, the selection/allocation criteria decision in fact rests with the Local Councils, in conformity with the provisions of Article 21 of Governmental Decision no. 1275/2000 for the enforcement of Law 114/1996 and its amendments. Based on this, social housing built with financial support from ROP, PA 9.1, will be allocated pursuant with the specific legislation, guaranteeing equal access to housing. These directives also include Governmental Decision no.137/2000 regarding the prevention and sanctioning of all forms of discrimination, and not only to persons from the target group, as indicated in the Applicant Guide.

1.2 Systemic dysfunction

Insufficient correlation at institutional level during the preparation of CLLD approach

As launched in 2015, the implementation process of this new approach envisaged the identification of MUZs that were to be covered by the LDS' intervention. This was based upon existing information gathered by the World Bank in the Marginalised Areas Atlas, or alternatively, based on relevant studies conducted at the local level. One of the fields analysed for setting the parameters of the marginalised areas, was that of housing, the questions asked referring to overcrowding or housing insecurity. Although useful, this information had no correlation with what was possible to be funded through ROP, respectively building, rehabilitating, modernising or equipping social housing. Hence, the LDS included data regarding privately owned houses, although what was really needed for prospective ROP funding was data social housing needs, based upon the filed requests. Although there are LAGs which did include social housing information in their LDS', an analysis of the needs is lacking, nor have any solutions been proposed, which often implies the need for a more complex approach or approaches, i.e. either for regulating informal settlements or for relocating the population.

Sustainability of NGOs members of LAGs

One possible structural problem of some NGOs members of LAGs is their sustainability and functioning on a long-term basis. Many NGOs identified in the field are small, with only a few staff members and very few projects. The need for sustainability was particularly expressed in small localities such as Ramnicu Sarat, Campina and Gherla. Some NGOs are local area branches of larger NGOs known for having access to financial resources, such as: The Red Cross (Focsani) or Partida Romilor (Campina). However, in reality, the help the LAGs receive from their headquarters is nearly non-existent or otherwise insignificant. For example, the Red Cross related branches function independently, or, in the case of Partida Romilor, provided only for office rent expenses. Taking into consideration the limited financial support received, these NGOs must access different financial sources in order to function, or work on a volunteer basis. They may, as result of LDS' approval within the CLLD framework mechanism, access the financial sources managed by the LAG as well as European funding, but for this purpose, they must have the ability to produce well-written projects.

The CLLD mechanism has taken into consideration the necessity for small NGOs at a local level to access funding and, in this regard, has organised more professional trainings for project elaboration. The overall systemic dysfunction emerges from the fact that these NGOs have been, up to that point, lacking experience in implementing medium or large projects; they lack human resources or adequately trained professionals while they are bound to receiving financing from structural funds without the knowledge or experience in dealing with them.

1.3. Unexpected or non-sufficiently addressed challenges

Migration⁶

Two localities were confronted with an unexpected situation - the migration of the MUZ's target group. In Resita, for example, the community migrated abroad in search of work. We consider that this type of situations may be foreseen if the initial analysis of the target group includes aspects referring to the risk of migration. In Focsani, for example, the ghetto-type apartment block was evacuated after utilities and rental contracts were cancelled and not prolonged. Many of the inhabitants went to live in other two blocks, which are also located within the MUZ, while the remainder left for other parts of the city. This type of situation, in which the target group is being evacuated from the MUZ (which has been proven to be illegal in many cases, by the Court), and the inclusion of some criteria at local level that block access to social housing (for example, the applicant must not have any unpaid tax debt), requires a correlation between the LDS with the plans that the local authority (namely, the building owner) has for the inhabitants of those blocks within the MUZ, taking into account the issues of illegal settling or of large debts in existence prior to the elaboration strategy.

Segregation

Although the MUZ apartment blocks are situated within the city proper and are not territorially segregated, there is also the case of social segregation. Often, the border of these communities is a symbolic one, and stigma has been built up over time. This phenomenon is the result of the lack of investment by the local authorities who have refused to improve the housing conditions. Some buildings are quite old (Ramnicu Sarat), or were built 25-30 years ago (Focsani-Bahne).

Non-segregation is a condition requirement for the sustainable development of the local communities, and the manner in which it is applied depends very much on the LAG and the local authorities. In regard to social housing construction, each municipality faces the issue of lack of available land. One example is Campina where one Roma representative within the LAG handed over to the municipality a plot of land for construction, located in a place where potential segregation was inevitable.

⁶ Although associated with school drop-out in the Guidelines for Bid Tenders launched by HCOP MA, migration risk was identified in two out of the nine LDSs via SWOT analysis (Reșița and Focșani). Nevertheless, as they were never taken into consideration, no possible measures were proposed.

The Romanian legislation has no clear criteria for defining and analysing territorial segregation, however, there are the guidelines and recommendations set out by the European Commission.⁷ In this regard, the MA OPHC also developed some recommendations in the field. During the monitoring period, building areas must be verified so that they do not succumb to territorial or ethnic segregation. In the case of renovations, soft measures have been encouraged to combat segregation.

Field respondents (either representatives of LAGs or of the local authorities) did not express many views on this subject, being treated as something of a less urgent matter, due to the fact that the more immediate issues were big delays in project implementation. Although those persons interviewed were familiar with the OPHC MA's field recommendations, the lack of clear legal provisions on territorial segregation leads to a less serious approach on the matter at the local level.

Preparation and consultation processes

The process of LDS' elaboration (completed only in three months in some cases) was highlighted as difficult, due to the short time available and the procedures that needed to be followed for the justification and elaboration of the project. Often times, outsourced consultant services were needed in order to analyse the problems and to develop the proposals for the LDS' according to Applicants' Guide requirements.

There have been delays in LDS project contracting procedures, caused by bureaucracy or by the precarious preparation of the entire process. For example, in July 2018, at the time of public consultation of guidelines launched by PA9 ROP, the ROP 2014-2020 was in the process of revision, including the PA9. In parallel, PA5 OPHC also required amendments to accommodate the Programme's procedures with the LDS. As a result, 18 months from the approval of LDS', no tendering of projects have yet to be launched.

Delays in project implementation, especially those intended for social infrastructure, leads to the community's loss of trust in its initiators or in their LAG representatives. Late implementation of the projects, often caused by administrative challenges, is very difficult to be explained to MUZ beneficiaries. Due to the prolonged process of starting the projects, some investments in MUZ (such as public lighting - Focsani) were conducted through other funds, with the money initially earmarked for other projects being ultimately re-directed towards other priorities.

The CLLD approach was generally something new for the civil servants from local administrations. Due to the fact that the issues of the Roma, or of disadvantaged communities, are usually dealt with only by certain departments (social assistance services), the bottom-up approach brought these groups' issues to the attention of several other departments at the municipal level. The approach was not a structural problem, but a new element for a system, which was, until then, not accustomed to conducting detailed consultation sessions with the actual beneficiaries of said projects. From the discussions with Roma representatives in the LAG, it may be concluded that the consultation process was conducted according to the guidelines. The beneficiaries, Roma and the NGOs from the LAG confirmed that the consultation steps were followed during the elaboration of the strategy, the meetings were not just formal, resulting in a properly illustrated scenario of the needs of the marginalised population in the document.

⁷ "Guidance for Member States on the use of European Structural and Investment Funds in tackling educational and spatial segregation", https://ec.europa.eu/regional_policy/sources/docgener/informat/2014/thematic_guidance_fiche_segregation_en.pdf

Chapter 2: Proper functioning of the LAG

Needs identified by LAG

Some LAGs (Ramnicu Sarat, Gherla) highlighted the fact that the allocated budget for their functioning is too small. Although the overall amount seems high, when distributed by number of months and minimum number of personnel, it is not sufficient. The administrative costs of all 37 LAGs are limited to the 15% of OPHC PA5. In many cases, City Halls have helped to find office spaces and the necessary equipment. The LAGs may also obtain funding from other projects, like any other NGO, which presents a viable solution.

It is important to note the fact that financing agreements for LAG functioning expenses were signed, in the majority of cases, only at the end of 2018, and therefore, only subsequent to this date, were the LAGs in a position to hire the necessary personnel in order to implement the LDS.

Field research took place during the period in which LAGs were preparing the Bidding tenders for projects. Based upon the discussions held, the only fears expressed related to actually receiving applications for the Tenders. Moreover, due to limited resources and expertise, they are unable to support the Bid beneficiaries in overcoming potential difficulties.

Relationship with OPHC MA

At the moment of the field research, the Bidding tenders were not yet launched, since the elaboration guidelines remained ongoing. The task of elaborating upon the Applicant Guides turned out to be a challenging task for the LAG members. They needed more technical support from the central authorities (MA), however, support came on the basis of very lengthy communication. Many people said that the recommendation received in the Guides working documents had no real substance and, in most cases, they were referring to changing/replacing certain words. Despite challenges, the LAGs managed to elaborate the needed guidelines. Substantial support came from other LAGs, based on mutual communication between them, especially between LAGs in close proximity, whose members were already acquainted. They collaborated and exchanged know-how on dealing with both administrative as well as procedural difficulties.

Many LAGs signalled a rather long period of uncertainty and exchange of information with the MAs regarding the Tenders to be launched and the internal procedures for functioning and the selection of projects. Despite all this, no serious issues were reported on the elaboration of guidelines, and communication with the MAs considerably improved over time.

LAG members' needs

Some Roma representatives (Campina, Turda, Gherla) highlighted the need to hire more facilitators (directly chosen by the LAG itself) to work hands-on with the community. Considering the dimension of the MUZs, various situations and vulnerable groups, there is a possibility that certain LAGs needed more human resources. A viable argument is the fact that any kind of communication or consultation must be done in a transparent way with all community members or members of the MUZ.

There is a great need for training in the areas of writing and implementing project proposals. Many LAG members (Campina, Medgidia) highlighted this need, and some have already organised such trainings with European Union funding. The result shall be reflected in the quality of the applications submitted in the future.

LAG member turnover

There was no fluctuation in regard to LAG members leaving the structure. The research period was one in which they were still working on the elaboration of guidelines and of the Bidding Tenders. The atmosphere was one of novelty and the realization of a long-anticipated experience. All staff interviews (with Roma and non-Roma) indicated a good collaboration between the members of the LAGs. A good example regarding the increase in LAG membership is Ramnicu Sarat, where the number of Roma representatives grew from 11 to 36.

Possible difficulties in project implementation

The following difficulties in implementing the LDS were mentioned by LAG members:

- During field research, one of the main question marks is whether the LAG will receive enough projects, as well as qualitative ones, bearing in mind the small number of participants in certain localities;
- Another major problem is represented by the extension of every implementation phase, generating the risk of not finalising the implementation of the projects by the end of the CLLD implementation period. The causes were mainly of an administrative nature (obtaining permits, approvals etc.);
- Lack of proper documentation of the land/building status on which the social infrastructure⁸ is expected to be implemented. Not all localities could provide locations with a clear and verified status. After the approval of the LDS, various situations occurred, thereby determining the relocation of, or at least the reconsideration of the social infrastructure location;
- Some budget estimations (especially regarding ROP) were not very precise and there is a need for supplementary documents or reallocation of financial resources⁹. Besides inexact estimations, significant costs variation (for materials, labour force) may definitely occur, from the moment of strategy elaboration to the concrete onset of works, particularly within a period of 3-4 years that could pass prior to their realization.

⁸ This information was not requested by the HCOP MA PA5 and the imposed forms did not include information on the property documents in cases of project proposals which included such investments.

⁹ Although the intervention forms were attached to the LDS (elaborated within the Bidding Tenders managed by HCOP MA), the budget estimates for future investments financed by ROP had not been based on /technical evaluations (feasibility studies), as no request for estimated budget explanation, nor for details regarding the property where the investment was to take place. Hence, there is a need to extend certain streets (in Campina, for example), although there is no information regarding the technical possibility of making this possible, with no details presented regarding the land itself nor technical options, until identifying this solution.

Chapter 3: Housing

The construction/rehabilitation/modernisation/equipping of social housing remained eligible under ROP 2014-2020, PA9.1, as well as for other Priority Axes (PA 3 and PA 13). Investing in the location of project implementation, respectively covered by the LDS, renders the implementation of this particular axis rather unclear, **not correlated with the principle of equal access to housing at the level of the entire administrative territorial unit**. Hence, this measure, which was initially conceived to solve a local problem, may actually create difficulties for local public authority in fulfilling their roles in the area of social housing.

Housing was identified as being **the first or second most important issue** at the local level. This aspect also transpires from the analysis of community needs and from consultation sessions. This is an important matter for the local authority as well, since not a great deal of funding was dedicated to the topic of housing. Intervention areas are older communities, in areas where houses have not been renovated in a long time or where the target group is composed of people living in huts. In some areas, there has been no water supply since the inception of the settlements; as well as no sewerage system, nor asphalted streets.

Addressing the housing issue up to the implementation phase of the projects was very simple: the existing needs were documented. The solutions were obvious - rehabilitation or housing constructions, asphalt the roads, etc. However, there is also a social dimension in housing. In Romania there is a lack of qualified persons who can address the need for housing with experience in **a community involved approach in the planned projection of the future intervention** (participatory design). Local authorities are rather preoccupied with the technical aspect of the construction process.

Selecting the type of community intervention was made on the basis on field analysis and includes activities such as road renovation, repairs, apartment block rehabilitation or social housing construction. The choices were made based on the existing situation at local level: where there were communities living in a block of flats and if the block could be rehabilitated, it was decided in favour for this kind of intervention. In cases where the target group lived in individual houses, the choice was to build a block of flats. In other cases where communities were spread all over the city, housing intervention was not possible for all communities.

At the time of the field research, some possible implementation challenges were identified:

- The need is higher than what is currently being offered. Discussions held with Roma representatives in the LAG indicate that the community has a very good understanding of the CLLD process. In one locality (Ramnicu Sarat) it was mentioned that, at the beginning of consultation sessions, every community member presented his/her personal requests in relation to their own household. The need for decent living is very high and the number of houses that may be build/renovated, through the CLLD mechanism, is limited. We consider that there is a need for a **transparent process** of the beneficiaries' selection, a process that is known and also agreed upon by the entire community. The beneficiaries have not been announced at the beginning of the consultation sessions about all the measures in the LDS. This may lead to future disagreements and at the moment of allocation there might be a need for mediation and agreements with the community.
- On the other hand, **the selection criteria of the beneficiaries of social housing**, at the local level, do not always favour those disadvantaged persons which need housing the most. For example, if

one of the criteria is not having debts, there is a high probability that a large majority of the people living within the MUZ will not qualify as beneficiaries. Field discussions show that the local authority representatives in the LAG are not really concerned about this issue, being convinced that the problem will be resolved somehow.

Some of the people living within the MUZ **do not have a permanent residence in the MUZ or at least in the respective locality**. Restoration of the apartment blocks where they live will represent a good pretext for their expulsion by the authorities, bearing in mind that the allocation of social housing is bound by the legal proof of permanent residence. We did not obtain a clear stance of the local authorities in regard to this issue. Based on what was learned in the field, there are **no solutions, for the time being, for the relocation of the beneficiaries**, during the planned restoration/rehabilitation of the buildings.

Another factor frequently mentioned is that the works are very likely to be delayed due to the **extended period in which technical permits are issued**, as well as permits needed for ROP interventions. The implementation of housing measures requires a certain type of expertise that refers to the involvement of the community in selecting and implementing the solutions. This process has to be correlated with the technical solutions (the building has to respond to beneficiaries' needs). LAGs do not have this type of expertise, therefore the inherent risk of processes being ignored or insufficiently implemented is likely.

Chapter 4: Social economy

According to documents for the Bidding Tender launched for the PA 9.1, ROP 2014-2020, the social economy structures of insertion are eligible, as stated in the MRDPA Decision no 2587/2019 referring to the *approval of a de minimis aid scheme for the support of social economy of insertion in the ROP 2014-2020 framework*. These enterprises have to fulfil the following criteria: 1) to prove they obtained a social brand through application for a social brand certificate in the pre-contracting phase and 2) to base their headquarters or other offices within the development region/on the LDS territory/the functional zone of the LDS where the project is being implemented. Besides this territoriality aspect, they must:

- maintain the type of legal profile as social enterprise of insertion, according to the amended Law 219/2015 on social economy, as well as
- maintain the CAEN classification unchanged and as specified in the application for which the financing contract is awarded;
- keep detailed accounts of the grant contract for a minimum of 10 fiscal years as of the date of the financing agreement or until the official closure of the Programme, whichever one occurs first¹⁰;

These conditions will lead to caution in applying or will lead to a smaller number of applicants.

Based on the findings during the field research, social economy is one component of CLLD projects, which is seen as a possible solution for solving the employment issue of persons that come from marginalised communities, who are at risk of poverty or social exclusion, alongside support measures that ensure access and sustainability in the labour market. As part and parcel of the CLLD mechanism, this is one of the support measures for entrepreneurial initiatives at the community level, used as means of growth and the diversification of income sources for community members.

Social economy is not a compulsory component for all CLLD projects. It became a measure in cases where it was considered to be a solution during the strategic elaboration process, in order to grow and diversify the economic and entrepreneurial economic activity at the community level (Campina, Gherla, Medgidia, Ramnicu Sarat, Resita, Sacele, Turda). Social entrepreneurship is seen as an innovative measure taking into account that social economy is a relatively new concept and not yet sufficiently known or developed in Romania.

Strategies include establishing and developing social enterprises of insertion in order to employ disadvantaged persons from the community. On one hand, support will be provided for establishing and developing social enterprises of insertion, and on the other hand, these will be possible to be properly equipped through the *de minimis* financial support scheme.

However, it is obvious that while these appear everywhere in the Local Development Strategies, there is no clear understanding of the difference between entrepreneurship in general and social entrepreneurship or social economy. Therefore, the legal restrictive criteria presented above do not represent (as of yet) valid topics of concern for the LAGs.

¹⁰ According to 06 Annex 7 - Financing agreement. Special terms PA 9, from the Applicant Guidelines package.

Chapter 5: Conclusions and recommendations

Currently, the primary challenge is related to **the lengthy delay in the implementation of projects**. This was caused mainly by the internal procedures and the rather slow communication with the MAs and the IROs.

According to discussions with all participants, the **mobilisation of the community** was a process which added value to the strategy development demarche, in the sense that the communication with the community comprised a significant part of the future beneficiaries and their needs and requests were reflected in the strategies. Due to the fact that this was a new process for the authorities, there was the risk that these consultations did not stir up local interest and debates, moreover since the relationship between authorities and the inhabitants of the targeted areas has not traditionally been known for good collaboration. In our opinion, the significantly positive outcome is due to the compulsory minimum criteria that this process was entailed to follow and to the dedicated participation of relevant members and community leaders.

Involvement of the Roma communities in the LAG is significant both in number (the initial number tripled in one of the localities) as well as in its contribution (these people were not ignored when they presented the needs of the community).

The added value of the CLLD mechanism transpired as important for at least three reasons: the areas addressed by the mechanism are areas where no significant ROP type of projects had been previously implemented (or had been implemented in recent years); the approach is a comprehensive one; and, last but not least, the beneficiaries were actively involved during the intervention planning process.

The ROMACT programme has been active since earlier times and, as such, has developed several working methods that are similar to the CLLD approach. During the research, we observed that most of the stakeholders (representatives of public authorities and the community) have benefited from the experience gained in the ROMACT and used it for developing and implementing a new programme using EU funds. The most relevant ways in which ROMACT has facilitated the implementation of CLLD are:

- It raised awareness in the community about the importance of conducting consultations and a common, strong voice while maintaining dialogues with the authorities – this is what the community action group has been doing and it was easy for the community to continue the dialogue under the CLLD framework. In both programmes it was important for the Roma communities to know and promote their priorities for community intervention. Consultations in the ROMACT programme contributed to setting priorities for CLLD as well.
- Having a facilitator between community and local authorities has proven to be useful for both the local authorities and for the community in CLLD implementation. The network of people from the community involved in ROMACT programme has also been involved in consultations during the CLLD and will continue to be involved in the future projects.
- The ROMACT programme has documented the situation in the Roma communities and has presented it to the local authorities (sometimes using specialists in different fields or organising meetings with representatives of the local council, addressing different

departments of municipalities, as well as with representatives of the ministries). This has generated improved knowledge and a better understanding of the way Roma communities may be developed in the future. During the interviews, representatives of the local authorities mentioned situations/geographical areas/problems that had already been indicated or addressed under ROMACT.

- Improvement of living conditions proved to be a top priority for all the communities and was placed high on the agenda for both the ROMACT and CLLD programmes. In some localities (like Focsani), ROMACT collected supplementary information regarding housing that was not obligatory in the CLLD strategies (like the level of debts for each apartment in a ghetto block), conducted several debates with representatives of different departments and local councillors, and recommended future actions. Moreover, in the area of housing, ROMACT has created a guide related to the criteria of social housing allocation, a guide that has been a source of debate among all representatives of the ROMACT municipalities. Before addressing housing in CLLD strategies, ROMACT municipalities have been exposed to a great deal of knowledge related to possible administrative, legislative and practical impediments to successful housing intervention. During the interviews, representatives of local municipalities were shown to be aware of this knowledge. Still, issues like relocations or allocation of new housing did not seem to be high on their agenda. Now, however, this is probably due to the huge delay in implementation of the entire programme.
- Increasing the capacities and building upon self-reliance local municipalities has been an ongoing need. ROMACT has addressed this by providing trainings on issues of general interest (i.e., how to write a good project proposal or how to run administrative procedures), focusing on the needs of the local authorities. In CLLD, the need for training was also addressed by the LAGs by developing member training sessions.

Recommendations

1. Housing

In order to properly prepare the ROP projects for implementation, there is need for a better/clearer communication with the community, at least in preparation of two important processes:

- *The selection of social housing beneficiaries, taking into consideration the relevant legislation at the municipal level and the fact that the MUZ is indeed part of the municipality.* The community representatives in the LAG and the community itself have to be acquainted with the distribution criteria of the social housing and accept the criteria; and, in order to facilitate solutions to possible controversial situations, a task force may be established with representatives of ROP MA or IO/RDA, civil society representatives, NCCD and other experts; it is also recommended that the ROMACT Guide for the allocation criteria of social housing be utilized;
- *The relocation process must be carefully managed* - identifying reasonable solutions for relocation, then communicating these solutions to the community and receiving its concurrence; clarifying the housing situation of MUZ inhabitants who are to be relocated is very important – these inhabitants who do not have lease contracts may experience difficulties in receiving social housing, especially if they are not registered in the respective locality.

For the authorities' point of view, the process of improving people's living conditions is very much linked to administrative processes related to construction/renovation works. During this period, issues such as relocation (during the works), clarifying the types of housing agreements (lease contracts) or possible evictions, do not seem to be a priority for the people interviewed on the ground level. Alongside beneficiary selection for the new facilities, these represent processes that require prior preparation and community consultation. All these steps must be included and documented in the intervention process for social housing.

2. Streamlining procedures for the next programming period

In order to efficiently implement the strategy, every LAG procedure, for the next period, should be analysed from the point of view of allocated time period and efficiency. This includes setting the LAG and its functioning regulations, needs analysis, consultation with the community, guidelines elaboration, consultation process with the MA and IO as a planned process. There is no need for these steps to be reinvented, but there is a need to have them analysed and improved upon. This analysis will identify the reasons for delays in starting the projects; and if a lack of LAG personnel is among these reasons, then the proposal to allocate a budget increase for the proper functioning of the LAG.

For the next programming period, at least six months' time will be allocated for the elaboration of the LDS as well as rigorous timeframe planning by the MAs. This timeframe needs to be respected in order to avoid the creation of false expectations by the community, a fact which, ultimately, may lead to demobilisation.

In 2021, there will be a national census in all EU Member States and, from the perspective of the Europe 2020 Strategy, this may serve the objective of the government to reduce poverty in Romania. This could represent an important source of data for the integrated mechanism of PA9 ROP – PA5 OPHC which refers to the impact of the implemented projects and the needs of the targeted group. A possible correlation

with the National Institute for Statistics could offer relevant data for analysis on the impact of PA9 ROP – PA5 OPHC interventions for the MUZ/FUZ territories.

It is recommended that the needs and priorities included in the strategies be updated, considering the long period of time between the reference study elaboration - the LDS - and the actual implementation of measures.

Moreover, through the census, it will be possible to identify MUZs, hence avoiding the situation that occurred from 2011 to 2017 when this exercise was repeated three times.

3. Recommendations for improved CLLD implementation

During the community mobilisation activities, an information and awareness campaign for the community could be of real use, prior to the needs' assessment stage. This could attract the targeted persons to participate more effectively in the meetings. Such information should be provided for the entire locality to avoid controversial/accusatory behaviours towards the local public authority. A much easier process of community mobilisation would require looser conditions imposed by the Applicant Guide and more freedom of action for LAG to be able to select the most suitable mobilisation/animation methods, or employ a larger number of community facilitators, especially if the LDS comprises of more MUZs. Approaching the media as a partner in these demarches could be also considered.

In order to conduct a relevant analysis that would comply with the quality criteria imposed by the Applicant Guide, it would be recommendable to verify first the availability of statistical data at the level of NSI/County Statistics Departments, before publishing the Guide.

There is need for more flexibility given to the LAGs to be able to hire the necessary human resources, without any constraint regarding the number or the type of experts that may be involved, especially where there are more MUZs in a LDS territory (for example, it is very difficult for a single person to cover the entire mobilisation process where there are more than two MUZs).

In the ROP component of the Applicant Guide, there are measures dedicated to social inclusion enterprises of insertion, while in OPHC, there are measures for the newly created businesses. In case in which, at the level of the researched communities, there was also a need for support for the development of the already existing businesses. Furthermore, the requirements for the social enterprises of insertion are difficult to fulfil by the entrepreneurs, while the knowledge and understanding of social business is limited.

The LDS targeting the inclusion of the MUZ should be determined by the local needs and should not respond only to the available EU financing opportunities; therefore, it should not only comprise projects that may be financed through the FEDR-ESF mechanism, but should envisage also funding from the local budgets. The LDS should reflect the needs of the local community, as well as the objectives that the community wants to achieve for itself in a given period of time, not limiting itself therefore to only copying the results indicators determined by the donors.

The target group of the public interventions covered by the approved LDS (especially the one in the MUZ) could experience major changes during the time period passed between the identification of needs (October 2017) and the finalisation of projects submitted for funding (end of 2021 the earliest for projects financed from PA9 ROP). From this point of view, it may be necessary to re-evaluate the target group's

needs in order to validate the options included in the LDS for October 2017, without going through the entire complex process conducted prior to the approval of the LDS.

4. Strengthening the local NGOs for a better community involvement

Generally speaking, MUZs are areas where there was no solid intervention for a very long time. As a consequence, the community's trust in the LAG or in the local authorities is very low. Community participation is necessary since the programming phase of the intervention; however, if the programming/approval process and the starting date of the intervention take too long, then the community's trust in the process will diminish significantly.

Therefore, it is recommended that, until the starting date of the bigger projects (like community centre, houses etc.), the community must be able to benefit from small projects ("small wins"), according to local needs, in order to maintain trust and cooperation with the local authorities. These types of interventions would also be beneficial to local NGOs, often with low implementation capacity, but with strong relationships within the community.

5. Conducting a demographic analysis

Since the implementation of the strategy is a lengthy process, there is a need for a risk analysis, especially in regards to the risk for migration. Moreover, there is also a need for an analysis based on age groups, since it is possible that over a long period of time, the problems identified at the moment of the initial analysis (e.g.: lack of kindergartens, schools) might no longer be relevant four years later.

6. Balance of Power within the LAG

One of the fundamental principles of the LAGs is to maintain a balance between the public sector and the NGOs. The NGO sector is not very developed in small, poor communities, due to the lack of funding for such organisations. Their main activity is to deliver social services to the community, and not to be "watch dogs". In this context, it is very unlikely that civil society organisations (within the LAG) will be able to counter-balance local political power. The recommendation in this case would be to closely monitor the entire process of strategy elaboration and implementation and to observe the power balance within the LAG. Presently, some dynamics hint to a rather high LAG dependency on City Hall. In small towns, the mayor had to intervene to stimulate the creation of the LAG (gathering the members, mainly those from the private sector) as well as to render the LAG functional (ensuring an office space, appointing a City Hall representative in the LAG). Up until the establishment of the LAG and the recognition of its activity, there is a need for a person/entity to negotiate with all the other actors; City Hall holds the best position for such tasks. Nevertheless, when this person/entity uses its power to influence the agenda of the LAG and the LDS, without prior consensus with the other actors, the power balance is no longer respected. Even if the representatives of the public sector are present in a more limited number than those of the private sector in the LAG, there is the risk that the NGOs or the private companies will be influenced by the public sector. This research did not particularly focus on this matter and cannot confirm the existence of such situations, although such cases are difficult to capture in this type of study.

Annex 1

No.	Name of LAG	City	County	No. of inhabitants	No. of inhabitants LDS	Total no of MUZ	Total no of inhabitants of MUZ	No of LAG founding member
1	Campina Community led - Local Development Association	Câmpina	Prahova	37,258	37,258	5	883	3
2	„Unirea” Focșani Local Action Group Association	Focșani	Vrancea	93,877	25,051	2	2,771	8
3	“Land of Somes” Local Action Group Association	Gherla	Cluj	20,982	18,700	1	18,700	3
4	Medgidia Urban Local Action Group	Medgidia	Constanța	46,106	13,315	3	695	14
5	„Sus Râmnicul Local Action Group” Association	Râmnicu Sărat	Buzău	40,189	40,189	8	8,347	11
6	Local Action Group Association Reșița	Reșița	Caraș-Severin	88,613	19,444	5	2,244	16
7	Local Action Group Association Gârcini	Săcele	Brașov	36,185	13,622	1	5,384	11
8	Urban Local Action Group Association Turda	Turda	Cluj	57,341	57,341	5	1,427	7
9	Local Action Group Association Vulcan municipality	Vulcan	Hunedoara	28,693	12,433	5	8,805	5
	TOTAL					35		

Source: Data was processed by LDSs and available documentation as found on the AM website

Annex 2

LAGs and LDSs selected for financing through PA5 OPHC - PA9 ROP integrated mechanism

No.	Name of LAG	Place	No. Of inhabitants	County	Development region
1	LAG Timișoara	Timișoara	332983	Timiș	West
2	LAG FREIDORF	Timișoara	332983	Timiș	West
3	LAG We think and act on local level	District 4 - Bucharest	321763	Bucharest	Bucharest Ilfov
4	LAG STRATEGAL	Galați	304340	Galați	South East
5	LAG Together we develop the 5th District	District 5- Bucharest	298816	Bucharest	Bucharest Ilfov
6	LAG Sustainable development of Ploiesti MUZ	Ploiești	233663	Prahova	South Muntenia
7	LAG Innovation and sustainable development	Bacău	196883	Bacău	North East
8	LAG Târgu Mureș	Târgu Mureș	150191	Mureș	Centre
9	LAG Baia Mare	Baia Mare	147801	Maramureș	North West
10	LAG Botoșani for the future	Botoșani	122311	Botoșani	North East
11	LAG Unirea Focșani	Focșani	94408	Vrancea	South East
12	LAG Târgoviște Equality of chance	Târgoviște	93563	Dâmbovița	South Muntenia
13	LAG Reșița	Reșița	88533	Caraș Severin	West
14	LAG Alba Iulia	Alba Iulia	74233	Alba	Centre
15	LAG Urban Corvinia Hunedoara	Hunedoara	74142	Hunedoara	West
16	LAG Giurgiu	Giurgiu	69051	Giurgiu	South Muntenia
17	SEPSI	Sfântu Gheorghe	65080	Covasna	Centre
18	LAG ZUM Mediaș	Mediaș	58571	Sibiu	Centre
19	Asociația LAG Urban Turda	Turda	57304	Cluj	North West
20	LAG Slobozia 2017	Slobozia	53085	Ialomița	South Muntenia
21	LAG Lugoj	Lugoj	47702	Timiș	West
22	LAG Urban Medgidia	Medgidia	46045	Constanța	South East
23	Sus Râmnicul	Râmnicu Sărat	40821	Buzău	South East
24	LAG Dej	Dej	38970	Cluj	North West

25	LAG CLLD Câmpina	Câmpina	37553	Prahova	South Muntenia
26	LAG Câmpulung Muscel	Câmpulung	36944	Argeş	South West Oltenia
27	Gârcini	Săcele	36028	Braşov	Centru
28	LAG Heart of Romanaşiu	Caracal	35207	Olt	South West Oltenia
29	LAG Urban Rădăuţi	Rădăuţi	33169	Suceava	North East
30	LAG Sebeş	Sebeş	32531	Alba	Centre
31	LAG Huşi –Inclusive community	Huşi	30484	Bacău	North East
32	LAG Turnu 21	Turnu Măgurele	29974	Teleorman	South Muntenia
33	LAG Municipal Vulcan	Vulcan	28927	Hunedoara	West
34	LAG Codlea	Codlea	26068	Braşov	Centre
35	Social commitment LAG-AS Moineşti	Moineşti	24684	Bacău	North East
36	LAG Carei for social Cohesion	Carei	24590	Satu Mare	North West
37	LAG Land of Someş	Gherla	23235	Cluj	North West

NOTE:

- the table is sorted by the number of inhabitants, the primary eligibility criteria
- data source: NIS
- **ROMACT communities** (highlighted in green)

Research sources

1. Development strategy of Câmpina, <http://clldcampina.ro/>
2. Development strategy Focşani municipality, <http://www.galunireafocsani.ro/resources/SDL-Focsani.pdf>
3. MUZ Local Development strategy of Gherla municipality. Get involved now! Change the future!<http://plaiurisomesene.ro/>
4. Marginalised Urban Zones development strategy of Medgidia municipality, <https://primaria-medgidia.ro/>
5. Local Development Strategy of Râmnicu Sărat municipality, <http://galsusramnicul.ro/>
6. Local development strategy of the Local Action Group Resita, <https://galresita.ro/>
7. Local Development Strategy of Gârcini community, Săcele municipality, <https://gal-garcini.ro/>
8. Development strategy of Turda municipality, <https://galturda.ro/>
9. 2017-2020 Local Development Strategy of Vulcan, <http://www.gal-vulcan.ro/>
10. <http://mfe.gov.ro/>
11. <http://inforegio.ro/ro/>