

Examples demonstrating bureaucracy in projects

A major problem is that the Guidelines can be changed at any moment; with retroactive relevance (it is difficult to imagine a greater legal uncertainty).

The Commission does not have a Single Contact Person, to whom one can report disputes (for example disputes with the project officer). In most countries, including Germany, such a person exists, e.g. at the Finance Ministry. In absence of such an office, the conditions for absolute arbitrariness of civil servants is created.

This means that every participant of a stimulus/subsidy program has to fulfil duties that could be changed any day, but is not provided with the corresponding rights. This is an example of inappropriate use of the rule of law. The main problem therefore is that there appear to be no rules for the Commission, except those which it creates itself.

The Commission implements such changes regularly and then breaks these amendments again when they are not fitting anymore.

An additional problem is the principally cascade-style review, given the fact that accountants among another are extremely ambitious when it comes to finding errors. Cost-effectively implemented random spot tests of a project will always leave (acceptable) deficits. In these, a subsequent accountant will find (often small) points of critique and with these will point out the deficiencies of his predecessor. This will then lead to a situation in which every accountant carries out an almost complete audit with an immense amount of effort, in order not to be embarrassed later on.

To add to the problem, many accountants are well-equipped with clear concepts of the enemy. A partner from Italy informed us, that the local Commission-authorized accountant had already in the first meeting stated that he assumed fraud and that he would prove that.

These are examples provided through a brief consultation with EUCAR's members. It is to be expected that a full investigation would certainly identify more issues of this type.