

**PROGRAM SAPARD – COMMITMENTS AND PAYMENTS  
ACCORDING TO INDIVIDUAL PROVISIONS BEFORE THE  
ACCEPTANCE OF THE SLOVAK REPUBLIC INTO THE  
EUROPEAN UNION**

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**Abstract:** This article explains the technique of redistribution of public resources from the SAPARD programme under individual provisions and regions of the Slovak Republic. Moreover, the article clarifies reasons of failure of individual project plans. Profit-making projects and reasons of rejections of applications for financial support under the SAPARD programme were subject to deeper analysis. On the basis of analysed data there can be observed the flow of public resources to areas with profit-making agriculture (Nitra and Trnava regions). The disproportion of drawing the financial resources during the monitored period of 2003 and 2004 was only confirmed and probably will be deepening in next years in disadvantage of companies economising in worse natural conditions. The most surprising was the inability of agricultural subjects covering the breeding of the livestock as well as the production and processing of fruits and vegetables to submit a complete project under the provision no. 1, that could be acceptable from the formal aspect to the SAPARD Agency (up to 43 applications were incomplete).

**Key words:** agricultural enterprises, SAPARD, APA, commitment, payment, public expenditure, approved projects

**Introduction**

The reason behind Slovak Republic's decision to take advantage of the aid of pre-accession and structural funds is the fact that the majority of aid-recipients does not dispose of sufficiency of the financial capital for realisation of the intended investment.

The ineffectiveness of existing agrarian policies in implementation of the market transformation of agriculture in the Slovak Republic, manifested in the low productivity and unattractiveness of this subdivision, delaying of structural changes, weakening of the competitive ability of the subdivision on the domestic and foreign market required evolvement of different programmes for support of agro-entrepreneurs. Financial resources received via these programmes by entrepreneurial subjects are a controversial and highly discussed topic of all economic debates. Irrecoverable financial contributions in any form, the production or direct appropriations on land, distort market prices of agriculture output, however, not taking the advantage of this offered opportunity would be a massive mistake for the Slovak Republic and all of us.

The extent of capability of depleting the financial resources from the pre-accession programme SAPARD was contrary to media proclaimed awareness of applicants

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not satisfactory enough. It was possible to receive a maximum of 50 per cent of the valid final expenses from the SAPARD programme concerning profit-making projects (provisions no. 1, 2, 4a, 5). These consist of three-quarters granted by the European Union and a quarter granted by the Slovak Republic. SAPARD was able to defray mostly all valid final expenses for non-profit making projects (provisions no. 3, 4b, 6, 7, 8, 9). However, these defrayable expenses were similarly granted by three-quarter by the European budget and the native country granted the rest of the costs.

### Material and Method

References were taken from the Ministry of Agriculture websites, the official methodological directions and information sources of the SAPARD agency (current APA – agricultural payment agency).

From the point of view of content this article analyses the drawing of financial resources in the scope of the SAPARD programme on the territory of the Slovak Republic up to May 31, 2004 according to selected provisions as well as regional division. The article tries to explain the method of redistribution of public resources from the SAPARD programme as well as reasons leading to failure of individual project plans. Profit-making projects (provisions no. 1, 2, 4a, 5) and reasons for eliminating individual applications were subjected to a more profound analysis.

During the evaluation process standard mathematical-statistical patterns and numerical calculations were used.

### Results and Discussion

The mission of the SAPARD Agency is to enable applicants from the Slovak Republic to exploit European Union (EU) resources for development of agriculture and rural areas in adaptation of the Slovak Republic to the Common Agricultural Policy of the EU in the pre-accession period via the SAPARD (Special Accession Programme for Agriculture and Rural Development) programme. The final invitation of applications for irrecoverable financial contributions was in the period till December 19, 2003 (9<sup>th</sup> round of invitations).

Priorities and provisions specified in the Plan for the Development of the Agriculture and Rural Areas of the Slovak Republic as well as for the pre-accession period were as follows:

Priority no. 1: Improvement of the agricultural production sector including the food industry

*Provision no. 1:* Investments to agricultural enterprises (potential applicants included physical persons and juridical persons in the agricultural basic industry)

- investments in the sheep sector
- investments in the poultry sector
- investments in the cattle sector

- investments in the pig sector
  - investments in the fruit, vegetable aromatic and curative herbs sector
- Provision no. 2:* Improvement of processing and merchantability of agricultural products and products of the fishing industry (potential applicants included food industry subjects)

- investments in the meat processing industry
- investments in the poultry processing industry
- investments in the milk and dairy products processing industry
- investments in the fishing and fish products processing industry
- investments in the fruit, vegetable and ready meals processing industry

*Provision no. 3:* Assistance in founding sales organisations of producers (potential applicants included associations of agricultural producers created on the basis of Commercial Legal Code since January 1, 2000 recognised by the SAPARD Agency)

Priority no. 2: Continuing development of the rural areas

*Provision no. 4:* Diversification of activities in rural areas

- 4a – non-infrastructure investments, agro-tourism (potential applicants included non-state-owned agricultural and silvicultural subjects and their associations)
- 4b – infrastructure investments (potential applicants included municipalities and associations of municipalities up to 5000 inhabitants)

*Provision no. 5:* Silviculture (potential applicants included physical and juridical persons using forests)

- investments in devices, appliances and technologies used in forest tree nurseries, afforestation, logging, convergency, centralisation and transportation of timber
- investments in information systems, computing systems and software

*Provision no. 6:* Agricultural producing techniques leading to conservancy landscape (potential applicants included physical and judicial persons and associations of persons economising agricultural land resources)

*Provision no. 7:* Land reform (potential applicants included only the Ministry of Agriculture of the Slovak Republic)

Priority no. 3: Upgrading of human activities

*Provision no. 8:* Upgrading of human resources (potential applicants included only the Ministry of Agriculture of the Slovak Republic)

*Provision no. 9:* Technical assistance (potential applicants included only the Ministry of Agriculture of the Slovak Republic)

Applications for the largest amount of public finances, more than 2.68 billion SKK were recorded for projects falling under the provision no. 2, with applicants including subjects of the food industry (dairy, meat, poultry, manufacturers of fruits, vegetables and fish). The ceiling of public expenses concerning this provision was at 1.43 billion SKK, this being not sufficient to cover all the applications once they are approved.

The second largest amount of public finances was recorded for the provision no. 1 (1.99 billion SKK), with potential applicants including agricultural subjects engaged in breeding livestock, growing farming products as well as manufacturing of fruits and vegetables. It is essential to mention that the ceiling amount of public finances for this provision did not cover entirely all requirements of applicants although the percentage of approved projects exceeded the limit in more than 23 per cent.

**Table 1. Commitments and payments under the SAPARD programme according to individual provisions up to May 31, 2004 (in thousands of SKK)**

Provision	Entered projects		Public expenses ceiling	Approved projects			Realised payments			Finished projects
	Planned valid expenses	Overall public expenses		From public resources		% of annual ceilings	From public expenses		% of annual ceilings	
				Overall	From EU		Overall	From EU		Disbursed amount
<b>No. 1</b>	4 033 238	1 997 312	1 329 159	1 642 844	1 232 133	123,6%	186 018	139 513	14,0%	160 646
<b>No. 2</b>	5 470 482	2 684 722	1 437 029	1 459 443	1 094 582	101,6%	548 117	411 088	38,1%	453 760
<b>No. 3</b>	79 244	79 244	29 760	29 760	22 320	100,0%	0	0	0,0%	0
<b>No. 4a</b>	1 166 570	587 726	210 230	213 433	160 075	101,5%	47 220	35 415	22,5%	33 299
<b>No. 4b</b>	991 370	991 370	728 093	730 065	547 549	100,3%	11 393	8 545	1,6%	0
<b>No. 5</b>	189 683	94 555	61 081	82 657	61 993	135,3%	25 456	19 092	41,7%	19 417
<b>No. 6</b>	307 213	307 213	54 408	54 408	40 806	100,0%	0	0	0,0%	0
<b>No. 7</b>	421 464	421 464	460 310	460 900	345 675	100,1%	58 423	43 817	12,7%	0
<b>No. 8</b>	4 975	4 975	5 000	4 975	3 731	99,5%	0	0	0,0%	0
<b>No. 9</b>	28 977	28 977	28 949	28 908	23 126	99,9%	0	0	0,0%	0
<b>Together AS</b>	12 693 215	7 197 556	4 344 018	4 707 393	3 531 990	108,4%	876 627	657 470	20,2%	667 122

*Source: internal data of the SAPARD Agency;  
average exchange rate is 1000 SKK = 23.5 EUR*

Overdraw of financial resources can be followed concerning the provision no. 5 (by 35 per cent). Anticipated reason for such action of the SAPARD Agency is to be traced to its experience that applicant in spite of the approval of the irrecoverable financial contribution does not start the subsequent realisation of the project.

It is important to notice that the foundation of the providing assistance through EU funds is the principle of reimbursement. In practical application this means that the resources from EU funds are not paid to the ultimate receiver in advance, but only on the basis of defrayed accounting records proving the realisation of the project. The company, therefore, has to declare the guaranteed minimal amount of co-financing of the capital expenditures. In reality it means that the entrepreneurially subject obtains even before the actual application the credit assurance from a bank or approved bank credit.

The resulting vicious circle does not enable the realisation of the intended project, because banks and other financial institutions are not ready to provide the required finances for intended projects although that these have successfully underwent the confirmation procedures.

Applications for the third largest amount of public finances, approximately 0.5 billion SKK were submitted according to the provision no. 4a by non-state-owned agricultural and silviculturally subjects. Projects endorsed in this provision were connected mostly with agro-tourism as well as with the development of additional productions and sales of local cuisine specialities. The ceiling of expenses for this provision was very low, 213 million SKK, and did not extend to the level to accommodate all applicants.

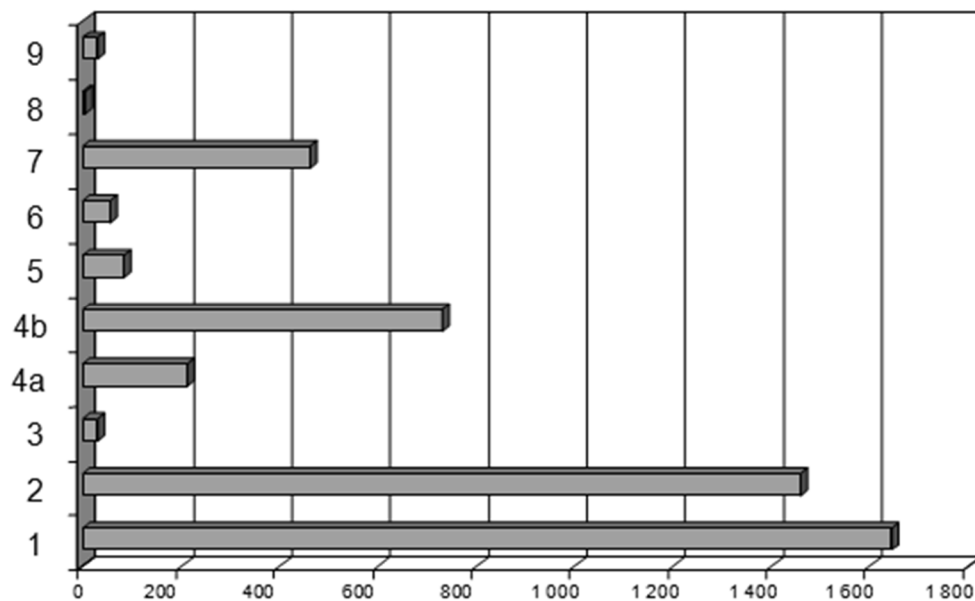


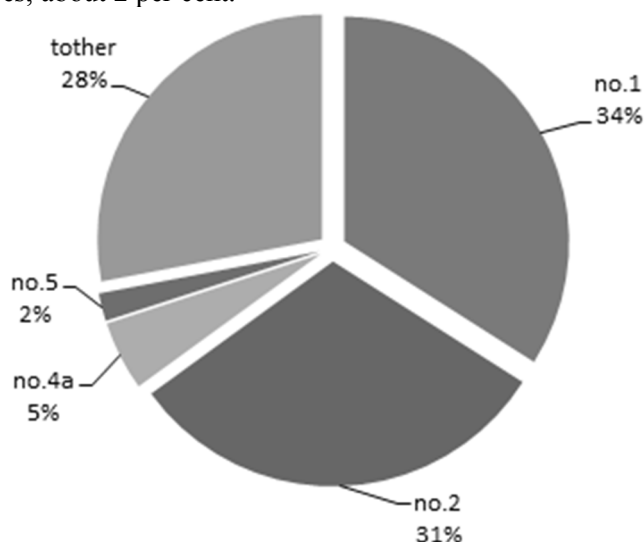
Figure 1. Amount of expenses for approved projects from public finances according to individual provisions in mil. SKK

Worth mentioning is the provision no. 4b according to which it was possible to support project in public interests, the applicants of which were municipalities and associations of municipalities and non-government organisation; and the supported project had to be located in a municipality with less than 5 000 inhabitants. The ceiling for this provision was from the point of view of municipalities insufficient and by far did not reach the desired amount that could accommodate all applicants. Here it is necessary to observe that the number of applications could have been a lot higher if the acceptance of applications had not been suspended.

The lowest amount of public expenses from the profit-making projects was monitored by the SAPARD Agency in connection with provision no. 5, where potential applicants included physical or juridical persons economising forests.

Most probable reason behind this lack of interest was the inability of applicants to obtain required financial resources for intended projects from banks and other financial institutions as well as unfinished transformational process of silviculture. Chart 1 provides a comprehensive overview of approved public resources in absolute numbers for individual provisions under the SAPARD programme.

From the overall amount of approved public resources (Chart 2) the highest percentage for the profit-making projects was obtained by subjects of agricultural basic industry, in relative numbers it stands for 34 per cent from all the public resources intended for the development of subjects under the provision no. 1 in the particular period (up to May 31, 2004) under the department of agriculture. Followed by projects under the provision no. 4b (31 per cent) submitted by subject of food industry (processors of basic agricultural production). The third rank is held, concerning profit-making projects, by applicants for the irrecoverable financial contribution under the provision no. 4a (5 per cent), investments covered agro-tourism, traditional manufacturing and local cuisine specialities. On the last position are subjects of forestry (provision no. 5) obtaining the lowest amount of public resources, about 2 per cent.

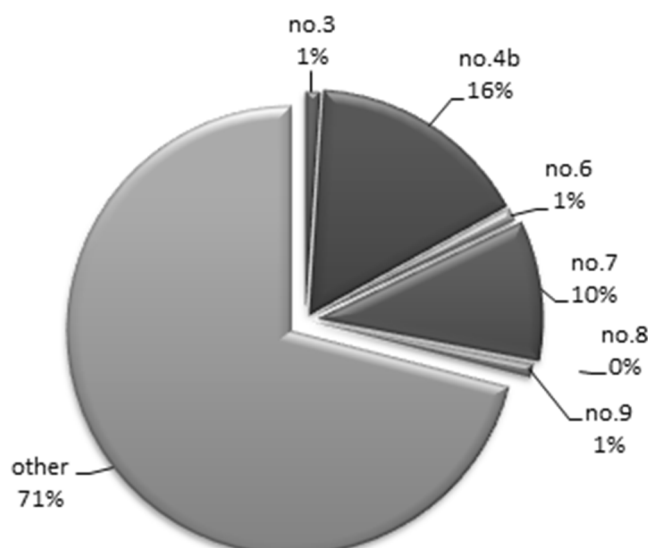


**Figure 2. Public expenses on approved projects of profit-making character in %**

The overview of drawing the financial assistance for non-profit-making projects shows priorities set up by the Ministry of Agriculture for redistribution of public resources under the pre-accession programme SAPARD.

Chart 3 shows that the highest amount of public expenses for non-profit-making projects was obtained by applicants for irrecoverable financial contribution under the provision no. 4b (municipalities up to 5 000 inhabitants) that obtained more than 15 per cent of overall amount of public expenses. It is worth to mention, that the second highest amount, more than 9 per cent, is allotted to projects under the

provision no. 7 covering land reform with the only potential applicant being the Ministry of Agriculture of the Slovak Republic. The amount of approved public resources for the rest of non-profit-making projects is in this comparison very small and in principle it does not exceed 1.5 per cent of the overall amount of all public resources from the pre-accession programme SAPARD.



**Figure 3. Public expenses for approved projects of non-profit-making character in %**

The final invitation, round 9, of applications for the irrecoverable financial contribution from the pre-accession SAPARD programme is at this time closed and numbers of submitted projects under individual provisions signalises a certain trend of increasing activity of applicant from the agricultural subjects.

Tables 2 and 3 provide a comprehensive overview of the particular period showing the final numbers of submitted and approved projects up to August 31, 2003 and to the final number on May 31, 2004.

**Table 2. Number of accepted and approved projects under individual provisions up to May 31, 2004**

Provision	Accepted projects	Declined projects	Approved projects	Realised payments	Finished projects	Approved projects in %	Variation in years (04-03)
Provision no. 1	450	79	371	66	35	82,4%	376
Provision no. 2	393	189	204	116	84	51,9%	240
Provision no. 3	7	1	6	0	0	85,7%	57
Provision no. 4a	102	64	38	24	10	37,3%	0
Provision no. 4b	165	15	150	5	0	90,9%	22

Provision no. 5	43	7	36	17	14	83,7%	-
Provision no. 6	12	2	10	0	0	83,3%	-
Provision no. 7	110	0	110	106	0	100,0%	-
Provision no. 8	4	0	4	0	0	100,0%	-
Provision no. 9	20	1	19	0	0	95,0%	-
<b>Together for the SAPARD Agency</b>	1306	358	948	334	143	72,6%	789

Source: Internal data of the SAPARD Agency

**Table 3. Number of accepted and approved projects under individual provision up to August 31, 2003**

Provision	Accepted projects	Approved projects	Approved projects in %	Started projects	Finished projects
Provision no. 1	74	40	54,05%	19	11
Provision no. 2	153	99	64,71%	32	24
Provision no. 4a	45	20	44,44%	6	2
Provision no. 4b	165	121	73,33%	0	0
Provision no. 5	21	13	61,90%	5	5
<b>Together for the SAPARD Agency</b>	517	351	67,89%	62	42

Source: Internal data of the SAPARD Agency

The highest number of applied projects, 450 applications, was recorded by the SAPARD Agency under the provision no. 1 (agricultural basic production). The smallest number of applied projects were recorded under the provision no. 4b (municipalities), however, the reason was not the indifference of these municipalities but the fact that financial ceilings assigned for this provision were already exhausted by the previous invitation for applications for the irrecoverable financial contribution. The highest number of successfully approved projects, more than 82 per cent, was recorded surprisingly under the provision no. 1 that belonged to the least successful in the previous year. Contrary to this, the lowest degree of successfulness, only 37 per cent, acquired projects under the provision no. 4a that confirmed the position of the worst developed projects.

From the input data follows that the highest growth of projects was recorded under the provision no. 1, which in absolute numbers represents the growth of 376 projects compared with 2003. This growth is caused by the information campaign of the department of agriculture that exerted the necessary pressure on the activation of the agro-entrepreneurs at the eleventh hour. Threat of not drawing the financial resources is still relevant, because the approval of the application does not represent the realisation of the investment plan. The negative trend showing the inability of subjects of agricultural basic production to finance the investment plan



is visible; this fact supports the small number of finished projects in the period up to May 31, 2004.

The enriched overview of the number of submitted and approved projects for individual regions is shown in Table 4.

**Table 4. Submitted projects, commitments and payments under the SAPARD programme according to regional divisions up to May 31, 2004 (in thousands of SKK)**

Region	Submitted projects			Approved projects			Realised payments			Finished projects	
	Number	Planned valid expenses	Overall public expenses	From public resources			From public expenses			Number	Paid amount
				Number	overall	From EU	Number	Overall	From EU		
BB	150	1656619	983838	94	561757	421317	28	106 645	79 984	17	89 414
KE	143	1271374	764091	77	379871	284903	19	52 636	39 477	9	26 691
NR	256	2616311	1415207	197	958440	718830	49	158 666	119 000	33	148 712
PO	129	1443224	791942	92	473602	355202	31	141 141	105 856	20	117 810
TN	100	1073905	572569	71	391010	293257	17	83 884	62 913	10	70 867
TT	276	3059005	1594194	202	1062889	797167	45	143 176	107 382	27	100 544
ZA	118	1117362	620300	82	385042	288781	39	132 055	99 041	27	113 084
Headquarters (BA)	134	455415	455415	133	494782	372532	106	58423	43817	0	0
<b>Together AS</b>	<b>1306</b>	<b>12693215</b>	<b>7197556</b>	<b>948</b>	<b>4707393</b>	<b>3531990</b>	<b>334</b>	<b>876 627</b>	<b>657470</b>	<b>143</b>	<b>667122</b>

Source: Internal data of the SAPARD Agency; average exchange rate is 1000 SKK = 23.5 EUR

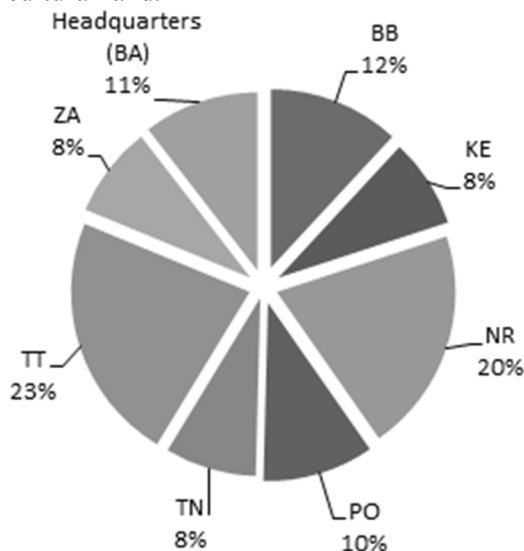
From the point of view of regional division the highest number of submitted projects 276 is recorded in the Trnava region, which successfulness is, on contrary with the previous period, comparing with other regions one of the highest. The highest amount of public expenses was obtained by the Trnava region in the amount of 1 billion SKK.

The smallest number of submitted projects was recorded in the Trenčín region (100) which together with Žilina and Košice regions obtains the smallest amounts of public resources.

The lowest successfulness of approval of projects compared to submitted projects is recorded in the Košice region (53.8 per cent) and Banská Bystrica region (62.6 per cent).

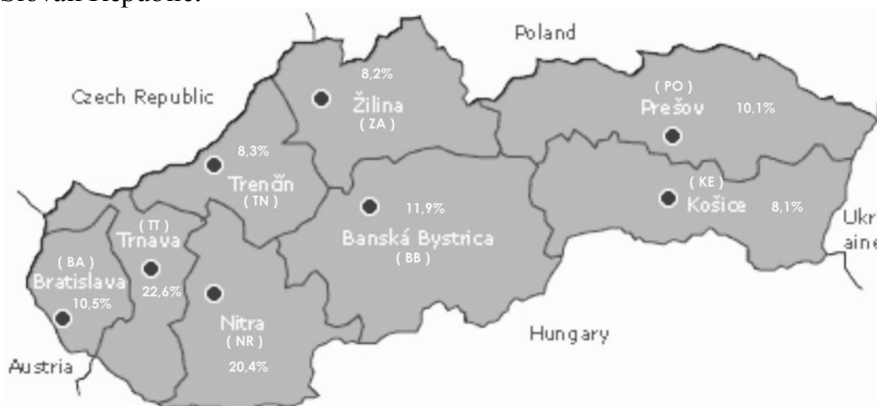
Concerning the share of the public resources at the financing of projects on the basis of regional differentiation the highest share was recorded by regions with the most fertile agricultural land, namely Trnava region (22.6 per cent) and Nitra region (20.4 per cent). The smallest share of the public resources was obtained by projects from Košice region (6 per cent) and Žilina region (8 per cent). Chart 4

provides the proportional share of public resources according to submitted applications to regional offices of the SAPARD Agency in individual regions. According to the comparison of the data from the particular period it is possible to notice the raising trend of influx of money from public resources to regions with the most fertile agricultural land.



**Figure 4. Proportional share of approved public resources on projects according to individual regions of the Slovak Republic**

For a better imagination of the regional division of the Slovak republic, the Picture 5 is provided, representing the map of the Slovak Republic with the proportional share of approved public resources on projects according to individual regions of the Slovak Republic.



**Figure 5. Proportional share of approved public finances on projects according to regional division of the Slovak Republic**

**Table 5. Statistics of rejected applications according to the reason of rejection and according to individual provisions in SKK**

Num.	Reason of rejection	Number of applications	Provision									Amount from SAPARD (SKK)	Amount from SAPARD (EUR)	
			1	2	3	4a	4b	5	6	7	8			9
1	Unsupported investments	1		1									2 123 000	48 712
2	Ineligibility of applicants	2		2									8 167 000	187 389
3	Non-fulfilling of criteria of economic viability	6	4	1		1							30098000	518 229
4	Non-fulfilling of criteria of Government Resolution 989/2002	6					6						60000000	1 440 000
5	Applications not meeting the overall evaluation according to results of the selection matrix	9	9										76477714	1 754 760
6	Incongruities notice by OPK	11	6			3		2					77515000	1 736 571
7	Withdrawal of the application from the SAPARD programme	12	5	1		2		3					38646000	886 722
8	Non-fulfilling the criteria of PRPaV (general and/or specific)	27	12	4	1	5	3	1	1				131833630	3 226 909
9	Incompleteness of the application	61	43	6		4	6	1	1				263235955	6 180 217
10	Exhausting of the amount of financial resources under the provision	223		174		49							1415778670	32484654
	<b>Together</b>	<b>358</b>	<b>79</b>	<b>189</b>	<b>1</b>	<b>64</b>	<b>15</b>	<b>7</b>	<b>2</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>2103874969</b>	<b>48464163</b>

Source: Internal data of the SAPARD Agency

Statistics of rejected applications according to the reason of rejection (Table 5) shows that the highest number of applications (223 applications) was rejected because of the lack of financial resources of the SAPARD programme; moreover it shows that more than 135 applications were unprofessionally prepared. Such a high number of incompetently developed projects suggest that applicants for the financial contribution do not use services of consulting companies eligible for the consulting with the accredited certificate. It is astounding to notice that contrary to clearly defined criteria of economic viability 6 entrepreneur subjects submitted developed projects regardless of non-fulfilling those criteria. On the other hand, there was a high number of submitted projects (61 applications) rejected from a further consideration because of an incomplete application.

**Table 6. Statistics of rejected applications according to regional division**

Abbreviation	Regional office	Number of applications	Amount from SAPARD (SKK)	Amount from SAPARD (EUR)
Headquarters (BA)	Headquarters of the SAPARD Agency	1	70 000	1 606
TN	Trnava	29	171 452 520	3 944 484
ZA	Žilina	36	167 121 500	3 834 556
PO	Prešov	37	296 701 887	6 807 743
BB	Banská Bystrica	56	319 902 581	7 655 675
NR	Nitra	59	417 132 226	9 570 983
KE	Košice	66	306 919 255	6 958 260
TT	Trenčín	74	424 575 000	9 690 857
	<b>Together</b>	<b>358</b>	<b>2 103 874 969</b>	<b>48 464 163</b>

Source: Internal data of the SAPARD Agency

A more interesting overview of the issue of rejecting applications shows Table 6, in which it is possible to see the statistics of rejecting of applications according to regional division. On the basis of reviewed data emerged that the highest number of rejected applications was in the Trenčín region (74) and Košice region (66). The most successful region according the approval of applications is the Trnava region.

### Summary

On the basis of analysed data it is possible to observe the flow of public finances into areas with profit-making agriculture and with better natural conditions (Nitra and Trnava regions). In principle it is understandable because the pre-accession assistance from the SAPARD programme was granted only to viable entrepreneur companies that during the last 2 years showed mostly positive results. The disproportion of drawing the financial resources during the monitored period of

2003 and 2004 was only confirmed and probably will be deepening in next years in disadvantage of companies economising in worse natural conditions. From the overall amount of approved public resources, the highest proportion for profit-making projects was obtained by subjects of agricultural basic production, in relative numbers it stands for the provision no. 1 up to 34 per cent of all public resources.

On the other hand there is seen a great number of municipal areas interested in obtaining the pre-accession assistance under the provision no. 4b (reconstruction of roads, footbridges, pavements, bridges and historical buildings, etc.) manifested in the high number of accepted projects up to 165. However, there was not enough public resources reserved for this provision under the SAPARD programme and in the 9<sup>th</sup> round of invitations, applications for these projects were stopped because of the lack of financial resources.

The most surprising was the inability of agricultural subjects covering the breeding of the livestock as well as the production and processing of fruits and vegetables to submit a complete project under the provision no. 1, that could be acceptable from the formal aspect to the SAPARD Agency (up to 43 applications were incomplete).

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## PROGRAM SAPARD - ZOBOWIĄZANIA I PŁATNOŚCI W ZALEŻNOŚCI OD POSZCZEGÓLNYCH PRZEPISÓW PRZED ODEBRANIEM SŁOWACJI DO UNII EUROPEJSKIEJ

**Streszczenie:** W artykule opisano techniki redystrybucji środków publicznych z programu SAPARD na podstawie poszczególnych przepisów i regionów Republiki Słowackiej. Ponadto, artykuł wyjaśnia przyczyny awarii indywidualnych planów projektu. Profit-tworzenie projektów i przyczyny odrzucenia wniosków o wsparcie finansowe w ramach programu SAPARD były przedmiotem głębszej analizy. Na podstawie analizowanych danych nie można obserwować przepływ środków publicznych na obszarach o zysk rolnictwa (regionach Nitra i Trnava). Dysproporcja rysunku środków finansowych w okresie podlegającym kontroli z 2003 i 2004 zostało to jedynie potwierdzone i prawdopodobnie będzie pogłębienie w najbliższych latach w niekorzystnej sytuacji przedsiębiorstw oszczędzania w gorszych warunkach naturalnych. Najbardziej zaskakująca była niezdolność rolnych tematy dotyczące hodowli zwierząt gospodarskich, a także produkcji i przetwórstwa owoców i warzyw do złożenia pełnego projektu w ramach świadczenia numer 1, które mogą być przyjęte z formalnym do Agencji SAPARD (do 43 wnioski były niekompletne).

### SAPARD计划-根据前斯洛伐克共和国加入欧盟前接受的个别条款的承诺及支付问题

**摘要:** 本文阐述了关于斯洛伐克公共资源再分配的SAPARD计划。此外, 文章还阐明了个别项目失败的原因。盈利项目和SAPARD计划下财政支持申请的失败原因已被深入分析。我们可以从数据分析中看出公共资源的流动和盈利农牧业(Nitra and Trnava地区)。2003, 2004年财政资源状况比例失调, 并且在下一年度一些条件差的公司可能会更加恶化。更使人吃惊的是, 涵盖了畜牧养殖水果加工等内容的项目已被提交, SAPARD应该正式介绍它们, 并且将此作为首要部分。