

PL/CPER/03110



The independent interim evaluation and monitoring services of PHARE

Country: POLAND

**Programmes covered:
1999-2002**

**Reporting period:
01/08/2001 to 31/07/2003**

Author: EMS Poland

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Signed:.....



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This review has been prepared by the EMS consortium contracted under the Phare programme.

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ABSTRACT

Scope of the review

The Country Phare Evaluation Review covers the findings of 21 interim evaluations undertaken by the EMS Consortium in Poland between August 2001 and July 2003. Assistance with a value of M€ 1,142 was evaluated (the majority in economic and social cohesion, and justice and home affairs).

Key achievements and findings

Phare assistance has successfully supported Poland's accession process. Successes have been noted, particularly where there was a clear national strategy and action plan, and the beneficiaries were well organised with dedicated and experienced staff with previous knowledge of Phare.

Phare programmes were generally *relevant* to sectoral needs but there were substantial shortcomings in the design of the evaluated programmes, including inadequate analysis of beneficiaries' absorption capacity, poorly developed indicators of achievement and unenforceable or unenforced conditionalities.

In half the monitoring sectors, Phare assistance was implemented with acceptable *efficiency*. A twinning project aimed at transfer of knowledge to regional and local authorities on how to manage the EU structural funds produced particularly positive results. Efficiency was however limited by inadequate co-operation between stakeholders, low quality of submitted documents and insufficient preparation of direct beneficiaries at local level.

Five of the eight monitoring sectors were rated satisfactory for achievement of the objectives. Supply of Phare-funded equipment has been crucial in the area of justice and home affairs, in particular for border control and police. However, a problem reducing *effectiveness*, particularly in institutional capacity building, is co-financing where commitment and conditionalities were not always respected.

A number of programmes have investment components that are expected to have a significant beneficial *impact*, in particular in the environment sector.

The prospects for *sustainability* of all the evaluated programmes are mixed. Sustainability of twinning projects has been enhanced by the establishment of long-standing co-operation between Polish and the twinning partner EU Member States.

Recommendations and key lessons learned

Recommendations include:

- Focus on to the development of the Integrated Administration and Control System and building capacity to manage EU structural and cohesion funds;
- Ensure quality of tender documentation through regular training and tighter quality control, and improve exchange of information between the involved parties;
- Quality assurance of programme design and improved local ability to monitor project implementation;
- Strengthen local capability to carry out interim evaluation and improve decentralised monitoring.

Lessons learned include:

- Good programme design requires the presence of a clear national plan, realistically stated objectives, strong links between the beneficiaries' policy, strategy and organisational structures, and Phare implementation institutions, a practical knowledge of project cycle management, and the development of a logical framework.
- The success of twinning was due to a good understanding of the needs, institutions being ready for the changes envisaged, Pre-Accession Advisors good at project management and communication, dedicated staff on both sides, and highly experienced EU experts.
- The 2000 Phare ESC programme proved to be a very effective and efficient way to train a relatively large number of beneficiaries, and familiarise them with structural and cohesion fund-type projects.
- Some implementing agencies provided beneficiaries with technical assistance aimed at improving the quality of documentation which helped reduce the delay in contracting.

PHARE SUMMARY SHEET

POLAND

Monitoring Sector	Total Phare (1999-2002)										Total within IE Reports (01/08/01 – 31/07/03)	
	Total Funding (M€)	Total Number of Programmes	Commitment (%)				Disbursement (%)				Total Funding (M€)	Total Number of Programmes
			1999	2000	2001	2002	1999	2000	2001	2002		
Agriculture	139.262	11	53	99	29	10	37	74	14	0	70.39	6
Transport	76.100	8	99	99	0	0	98	62	0	0	73.00	6
Public Administration	186.692	15	98	98	39	12	89	70	22	1	182.47	9
Justice and Home Affairs	217.830	6	77	94	34	1	75	86	19	0	146.51	5
Internal Market	120.827	10	98	98	41	18	61	54	24	0	103.72	5
Environment	97.799	9	82	99	27	20	81	65	10	0	78.00	4
Regional Policy and Cross-Border Cooperation	716.005	24	96	99	39	2	95	59	7	0	488.60	18
Total¹	1,554.515	83	89	98	35	6	83	65	12	0	1,142.69	53

Interest accrued included. Source: Perseus, dated 31 October 2003.

¹ Excludes double counting of programmes evaluated more than once.

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GLOSSARY OF ACRONYMS

AP	Accession Partnership
CAP	Common Agricultural Policy
CAR	Country Assessment Review
CBC	Cross-Border Co-operation
CFCU	Central Finance and Contracts Unit
CIS	Centralised Implementation System
CPER	Country Phare Evaluation Review
CSHQ	Commission Services at Headquarters
DIS	Decentralised Implementation System
EBRD	European Bank for Reconstruction and Development
EC	European Community
EEC	European Economic Community
ECD	European Commission Delegation
EDIS	Extended Decentralised Implementation System
ESC	Economic and Social Cohesion
EU	European Union
HRD	Human Resources Development
IACS	Integrated Administration and Control System
IE	Interim Evaluation
IoA	Indicator of Achievement
ISPA	Instrument for Structural Policy for Pre-Accession
JMC	Joint Monitoring Committee
KIE	Committee for European Integration
LFPM	Logical Framework Planning Matrix
MARD	Ministry of Agriculture and Rural Development
MoELSP	Ministry of Economy, Labour and Social Policy
MR	Monitoring Report
M€	million of euro
NAC	National Aid Co-ordinator
NAO	National Authorising Officer
NGO	Non-Governmental Organisation
NF	National Fund
NPAA	National Programme for Adoption of <i>Acquis</i>
NPPM	National Programme of Preparation for Membership
PAO	Programme Authorising Officer
RFI	Regional Financing Institution
SAPARD	Structural pre-Accession Programme for Agriculture and Rural Development
SME	Small and Medium-sized Enterprise
SMSC	Sectoral Monitoring Sub-Committee
SPF	Small Projects Fund
TA	Technical assistance
UKIE	Office of the Committee for European Integration
€	euro

PREFACE

This Country Phare Evaluation Review² (CPER) is an overview of the implementation of Phare programmes in Poland, highlighting key successes, effectiveness and impact of the instrument in supporting the accession process. It is based on Interim Evaluations (IE) of Phare programmes in Poland carried out by the EMS Consortium between August 2001 and July 2003, and covering 1999, 2000, 2001 and 2002 programmes. In total, 21 IE reports were produced across 8 monitoring sectors in Poland, and two overarching summary reports for public administration and agriculture. A total of 53 programmes were evaluated with a value of M€ 1,142.69. This represents 67% of the Phare assistance to Poland.

The CPER also makes use of a number of multi-country and thematic reports produced by the EMS Consortium, and external reports, such as *ex-post* evaluations, reports of the Court of Auditors, and Monitoring & Assessment Reports and the Country Assessment Review of April 2001, prepared by the OMAS Consortium.

The programmes evaluated in the IE Reports were those set out in the EMS Work Plan, agreed with the National Aid Co-ordinator and the European Commission Delegation (ECD), and endorsed by the Joint Monitoring Committee (JMC).

The IE Reports followed a standard methodology, which developed over time and took account of changing needs. They were designed to be management tools. Evaluation was normally of a cluster of Phare programmes grouped by sector or sub-sector. The clusters included all the Phare programmes that were ongoing at the time of each evaluation. Implementation was evaluated on the basis of the five criteria: relevance, efficiency, effectiveness, impact and sustainability. Comments were sought from key actors on both the fact base and the evaluation itself. Based on the evaluation, conclusions and recommendations were made. Debriefing meetings followed the issue of the report and were the basis for follow-up actions.

² The report has been written by John Barker in co-operation with Martin White. The Report was reviewed at EMS Central Office by Richard Haines.

Monitoring Sector	IE Report Number	Programmes/Components Covered	Date of issue of IE Report	Date of debriefing
1. Internal Market	R/PL/STD/01028	PL-9905.01	13/09/01	17/10/01
	R/PL/INT/02094	PL-9905.02, PL-9905.03, PL-9905.04	26/09/02	08/11/02
	R/PL/INT/02101	PL-9903, PL-0003.07&12, PL-0004.02-05, PL-0101.06, PL-0102.02,03,05,06,08,&09	11/04/03	21/07/03
2. Public Administration	R/PL/CUS/01029	PL-9904.01	13/09/01	17/10/01
	R/PL/PAD/01029	PL-9904.03	30/01/02	04/03/02
	R/PL/PAD/02096	PL-9904.01,02,03,06,07, PL-9910, PL-9915, PL-9919, PL-0001.01, PL-0003.01-06,10,11,13-15, PL-0004.01, PL-0101.01-15	12/12/02	23-30/01/03
	R/PL/PAD/03029	PL-0003.04, PL-0101.13, PL-0101.14, PL-0002.01, PL-0101.10, PL-0101.11	23/06/03	23/07/03
	R/PL/PAD/03099	PL-0003.01,03, PL-0101.01,02,04,.05,07-09,12,15, PL-0102.07	03/07/03	08/09/03
3. Environment	R/PL/ENV/02001	PL-9907, PL-9912	07/03/02	19/04/02
	R/PL/ENV/02097	PL-9907.01,02, PL-9912.02,03, PL-0007.01-03, PL-0105.01-07	30/01/03	12/03/03
4. Transport	R/PL/TRA/02092	PL-9807, PL-9809, PL-9908	31/05/02	05/08/02
	R/PL/TRA/02099	PL-9908.03.01, PL-0003.09, PL-0101.03	26/03/03	20/05/03
5. Regional Policy	R/PL/REG/02091	PL-9909.01, PL-9918	04/06/02	04/07/02
	R/PL/REG/03028	PL-0003.13, PL-0008, PL-00106, PL-0112	25/06/03	14/07/03
6. Justice and Home Affairs	R/PL/JHA/02093	PL-9804.01, PL-9904.04, PL-0005.01	19/09/02	19/11/02
	R/PL/JHA/02100	PL-0005, PL-0013, PL-0103	09/04/03	27/05/03
7. Agriculture	R/PL/AGR/02095	PL-9906.01-04, PL-0003.08, PL-0006, PL-0104	30/12/02	17/02/03
	R/PL/AGR/03030	PL-9906.01, PL-0006.05, PL-0006.06	26/05/03	28/07/03
	R/PL/AGR/03101	PL-9906.03, PL-0003.08, PL-0006.04, PL-0006.07, PL-0102.04, PL-0104.01, PL-0104.03-6	24/06/03	28/07/03
	R/PL/AGR/03102	PL-0006.01-03,08,09, PL-0104.02,07-10	23/07/03	28/07/03
8. Cross Border Cooperation	R/PL/CBC/02098	PL-9911, PL-9913, PL-9917, PL-0009, PL-0010, PL-0011, PL-0014, PL-0015, PL-0108, PL-0109, PL-0110, PL-0111	23/12/02	20/02/03

MAIN REPORT

1 INTRODUCTION

1.1 The EU - Poland Relationship: Co-operation to Accession

1 Official diplomatic relations between Poland and the European Economic Community (EEC) was established in September 1988. At the beginning negotiations related to agreement on trade and economic co-operation, which was signed in Warsaw on 19th September 1989. Implementation of this agreement resulted in rapid growth of economic co-operation between Poland and the EEC so that already in 1990 the EEC Member States became Poland's biggest trade partner.

2 Main facts from the history of Poland-EU relations are presented in the following table:

Date	Event
July 1989	Poland's diplomatic agency at the European Community (EC) was established (first Ambassador of Poland was accredited in 1990)
25 th May 1990	Poland officially requested commencement of negotiations on an Association Agreement with the EC (European Agreement)
26 th January 1991	Plenipotentiary of the Polish Government on European Integration and Foreign Aid was appointed
16 th December 1991	European Agreement between Poland and the EC was signed
8 th April 1994	During the Athens Summit of the EC, Polish Foreign Minister submitted an official document expressing Poland's will to join the European Union (EU).
8 th August 1996	Committee for European Integration (KIE) was established (its first meeting took place on 12 th November 1996). KIE is composed of ministers indicated by a special Act, and is responsible for the process of Poland's integration with the EU.
16 th October 1996	Plenipotentiary of the Polish Government on European Integration and Foreign Aid was replaced by the Office of the Committee for European Integration (UKIE). UKIE is the governmental institution servicing KIE.
28 th January 1997	Polish Council of Ministers adopted National Strategy for Integration, a document identifying actions to be taken in the pre-accession period.
31 st March 1998	Poland commenced negotiations on accession to the EU
4 th May 1999	Public Information Programme
13 th December 2002	Poland completed negotiations on accession to the EU
16 th April 2003	Accession Treaty signed during the Athens Summit of the EU
7-8 June 2003	Referendum on Poland's accession to the EU

3 In its 2002 Regular Report on Poland's Progress Towards Accession,³ the European Commission congratulated Poland on its progress in fulfilling the Copenhagen political criteria, as well as deepening the stability of its institutions guaranteeing democracy. However, the Report noted also the disparity between progress in the adoption of legislation and the reinforcement of administrative capacity. There still remain formidable and intractable problems with respect to alignment that must be overcome to ensure full compliance with the

³ Brussels, 9th October 2002, {COM(2002)700 final}.

acquis from the date of accession. This message is reinforced in the regular Reports⁴ that are prepared to assess continuing progress in preparations for Poland's accession.

1.2 National Strategies and Action Plans

4 Details of basic strategic documents and Action Plans adopted by Polish authorities in relation to European integration and Poland's accession to the EU are presented below:

Date	Document
3 rd June 1997	Polish Council of Ministers adopted Timetable for Implementation of National Strategy for Integration
March 1998	Polish Council of Ministers adopted National Programmes of Preparation for Membership in the European Union (NPPM), which is the Polish version of the National Programme for Adoption of <i>Acquis</i> adopted in other Candidate Countries. NPPM is annually updated to ensure that it is in line with the current annual edition of the Accession Partnership and reflect progress in accession negotiations between Poland and the EU.
4 th May 1999	Public Information Programme – Polish Integration with EU adopted by the KIE
13 th June 2000	Second National Environment Policy adopted by the Council of Ministers
15 th November 2001	European Strategy of the Government of the Republic of Poland adopted by the Council of Ministers
10 th April 2002	Report on Poland's institutional approximation activities for the requirements of the Membership in the EU adopted by KIE
16 th April 2002	Action Plan on Strengthening of Administration and Judiciary in Poland adopted by Council of Ministers
14 th January 2003	National Development Programme 2004-2006 adopted by Council of Ministers

1.3 Changes in Phare Procedures

5 When Phare started, it was managed centrally by the Commission Services at Headquarters (CSHQ). In the late 1990s, the Decentralised Implementation System (DIS) was introduced, transferring responsibility for management and contracting to the Polish side. In December 1998, the primary responsibility for supervising the implementation of Phare programmes was transferred from the CSHQ to the EC Delegation (ECD) in Warsaw. In 2001, the procurement part of DIS was replaced by a "Practical Guide to Phare ISPA and SAPARD contract procedure" (PRAG), which provided procedures and standard documents for awarding services, supplies and works contracts.⁵

6 In 1999, the Commission Services introduced the concept of an Extended Decentralised Implementation System (EDIS), under which responsibility for ex ante approval for project selection, tendering and contracting will be waived to the new member states after they have achieved accreditation from the CSHQ.⁶ In 2002, Poland started activities aimed at the accreditation for EDIS. Commission Document 'Roadmap to EDIS for Phare and ISPA' identified four stages for the Commission to take its decision to grant EDIS: 1-Gap Assessment, 2-Gap Plugging, 3-Compliance Assessment and 4-Preparation for Commission decision. The Gap Plugging phase has almost been completed for Polish administration institutions. Stage III Compliance Assessment started in October 2003. Also, the relevant Department within the Office of the Committee for European Integration (UKIE) is planning to

⁴ Warsaw, June 2003, Poland Regular Report.

⁵ ISPA = Instrument for Structural Policy for Pre-Accession. SAPARD = Structural pre-Accession Programme for Agriculture and Rural Development.

⁶ The *ex-ante* control of projects and financial management of funds are similar to the requirements for EU structural and cohesion funds.

develop capacity for managing Phare evaluation in the future. However, the precise structure of the evaluation capacity has not yet been agreed and there is still lack of financial resources to cover the IE exercise.

1.4 Phare Management System in Poland

7 In 1998, management of Phare programmes became the responsibility of the Committee for European Integration (KIE). Since April 1999, a National Fund (NF), structured around the State Treasury and located at the Ministry of Finance, has been the central body through which Phare and other EU funds are channelled. The NF, headed by the National Authorising Officer (NAO), has overall responsibility for financial management of funds and ensures that Phare procurement rules, reporting and financial management procedures are respected. The NF also ensures the flow of national co-financing. Project Authorising Officers (PAO) bear responsibility for the effective implementation of Phare programmes as well as the economic, effective use of funds and the observation of the principles of sound financial management.

8 The Undersecretary of State at the Office of the Committee for European Integration (UKIE) is the National Aid-Co-ordinator (NAC) in Poland. The NAC has overall responsibility for the co-ordination and management of Phare in accordance with DIS Rules. UKIE was created by a law passed on 8th August 1996 and started operations on 10th October 1996. UKIE coordinates the works of all ministries and institutions directly engaged in the process of Poland's integration with the European Union. Within UKIE, the *Foreign Assistance Co-ordinating and Monitoring Department (DPZ)* is responsible for programming and monitoring the use of funds issued within the framework of non-refundable foreign aid, co-ordinating the receipt of pre-accession assistance within the Phare, ISPA, and SAPARD programmes and co-ordinating actions aimed at preparing Poland for participation in Structural Funds.

9 Direct responsibility for financing and contracting of Phare institution building programmes was transferred to a Central Finance and Contracting Unit (CFCU) which was established in August 1999. The line ministries (assisted by Project Implementation Units) became responsible for technical aspects of project implementation. Cross-border co-operation programmes and the majority of infrastructure investment programmes are implemented by Implementing Authority for Phare CBC Programmes and Polish Agency for Enterprise Development.

10 In order to prepare Poland's administrative structures for future programming, project selection, contracting, and implementation of EU structural funds, a new programming, management and implementation system was established for the Phare 2000, 2001 and 2002 ESC programmes. Under this system, direct beneficiaries, supervised by *Marshal* Offices (regional self-governmental authorities), have overall responsibility for programming, selection of projects, preparation of necessary documents. Implementing Agencies at central level have the main responsibility for contracting. *Voivodship* Offices (regional governmental structures) are responsible for financial management of contracted projects. Both *Marshal* and *Voivodship* Offices report to implementing agencies that are responsible for the entire process of programme implementation. This system is compatible with Poland's devolved system of local government. However, there are frequent problems of communication and co-ordination between the partners.

1.5 Decentralised Monitoring in Poland

11 Monitoring of the Phare Programme was decentralised at the end of 2000. In Poland, a Joint Monitoring Committee (JMC) and eight Sectoral Monitoring Sub-Committees (SMSC) were established. The aim of the JMC is to evaluate progress of Phare programme implementation in the achievement of their stated objectives, and assess whether Phare projects are in line with priorities of the Accession Partnership (AP) and targets of the National Programme of Preparation for Membership in the European Union (NPPM). The JMC is composed of the National Aid Co-ordinator (NAC) (UKIE), the National Authorising Officer (NAO) (Ministry of Finance), and the Commission Services. The JMC meets twice a year, and the most recent meeting was held on 17th December 2003.

12 SMSC meetings are organised twice a year (normally in Spring and Autumn) with the aim of assessing project and programme implementation, identifying risks and threats, and proposing to the JMC recommendations on necessary corrective actions. All parties interested in effective implementation of Phare programmes participate in SMSC meetings: the NAC, the NAO, relevant Programme Authorising Officers (PAO), representatives of implementing agencies, and the Commission Services. The eight SMSCs in Poland are:

- Agriculture;
- Cross-Border Co-operation;
- Environment;
- Internal Market;
- Justice and Home Affairs;
- Public Administration Development;
- Regional Development;
- Transport.

13 Overall, monitoring reports (MR) did not provide the factual basis for interim evaluation, or for project supervision by the EC Delegation or the SMSC. Although there is significant progress in the quality of monitoring reports compared to the past, there is little attempt to differentiate between detail and key issues, and in general, there is no differentiation between outputs, effects and expected impact. MRs may be out of date at the time of the interim evaluation by four to nine months.

14 Although the principle of co-financing was well established and was often a significant part of the total funding for assistance projects, there was no functioning formal mechanism to record the co-financing commitment and disbursement figures alongside the Phare commitment and disbursement figures produced by the UKIE and/or the CFCU. It is understood that a system has recently been developed.

1.6 The Interim Evaluation Process

15 Independent interim evaluation (IE) of the Phare assistance was undertaken by the EMS Consortium between October 2001 and July 2003.⁷ It was based on a Phare Interim Evaluation Guide issued by the Evaluation Unit of DG ELARG. This defined the approach, procedures, methodology and reporting, and provided annotated templates for the IE reports.

⁷ Between April 1996 and July 2001, the OMAS consortium undertook regular monitoring and assessment of Phare programmes using a methodology similar to that used by EMS, which evolved over time.

16 The standard format of IE reporting was changed on 1 August 2002 to enhance the transparency of the evaluation, by making use of the five standard evaluation criteria:⁸

- *Relevance*, whether the design of the project targets the needs of beneficiaries;
- *Efficiency*, whether the same results could have been achieved at lower costs;
- *Effectiveness*, whether the objectives have been achieved and the planned benefits were delivered;
- *Impact*, the extent to which the benefits received by the beneficiaries had a wider overall effect on the sector or region or in the country as a whole;
- *Sustainability*, whether the flow of benefits of the project is likely to continue after external funding ends.

17 The IEs are based on sectoral monitoring reports, previous evaluations, other key documents and interviews with main stakeholders. They are both ‘summative’ and ‘formative’, containing recommendations of on-going programmes and for improving the design of future programmes and projects.

The Interim Evaluation cycle starts with the JMC deciding on the EMS annual evaluation plan. This plan commonly comprises between 2-3 IEs per country team evaluator, together with a country summary report (CSR), input into miscellaneous thematic reports that are undertaken by EMS Central Office in Brussels, and the Country Phase Evaluation Review (CPEER) report at contract-end.

18 In July 2003, the EMS evaluation office was closed. However, as part of the EMS work programme in 2003, one local evaluator was assigned to work with the NAC for four months for know how transfer for taking over evaluation activities. In terms of progress, the general principle of segregation of duties between monitoring and evaluation functions within the Monitoring and Evaluation Section at the Office of the Committee for European Integration (OCEI) has been applied. An analysis of the “Strategy and action plan on monitoring and evaluation capacities”, preparation of the decentralised IE system has also been undertaken. In addition, Poland actively participates in the working groups of the Evaluation Advisory Group, whose role is to facilitate exchange of information in relation to monitoring and evaluation activities.

⁸ “*Evaluation in the European Commission*”, Brussels, 2001, and <http://www1.oecd.org/dac/Evaluation/htm/evalcrit.htm> from the Development Assistance Committee (DAC) of the OECD.

2 EVALUATION FINDINGS OF PHARE PROGRAMMES 2001-2003 BY SECTOR

2.1 Relevance

19 Phare assistance has reflected sectoral needs (both in relation to Government policy and accession priorities presented in succeeding editions of the NPPM and AP), in particular in the areas of cross-border co-operation, public administration development, environment, regional development, justice and home affairs and internal market. The key positive features are shown in the accompanying box.

Key factors where programme relevance has been rated 'Highly Satisfactory':

- Well identified sectoral needs and priorities, and strategic approach to the sector defined by National Strategy adopted by the Government;
- Accurate assessment of institutional and administrative capacity at the design stage;
- Beneficiaries having a clear vision of expected outputs and results of the assistance.

20 Time pressure on the approval of planning documents made compromises inevitable, often at the expense of good programme design.⁹ Furthermore, the time gap (1.5-2.5 years) between design and implementation created additional

Overall Programme and project design weaknesses:

- Inadequate analysis of beneficiaries' absorption capacity;
- Poorly developed indicators of achievement;
- Conditionalities poorly defined and/or not enforced.

problems so that often project implementation was achieved only thanks to the flexibility offered by vaguely formulated objectives. On the other hand, there were substantial shortcomings noted in the design of the evaluated programmes (over-ambitious and/or vague objectives often inappropriate for the allocated funds, over ambitious assessment of the beneficiaries' absorption capacity, and conditionalities unenforceable or unenforced). Insufficient attention was paid to the use of logframes as a project management tool. There is also still a need for better identified and more precisely stated indicators of achievement of programmes/project objectives, notwithstanding significant progress in the quality and relevance of indicators identified in programming documents for Phare 2001 and 2002 that could be used as a useful managerial tool.

21 In the **agriculture** sector, although Phare assistance was relevant to sectoral needs, the lack of overall direction and control of Phare assistance within the Ministry of Agriculture and Rural Development (MARD) adversely affected the planning and programming process. Much progress still needs to be achieved to prepare the agriculture sector for compliance with the *acquis*, both with respect to legal approximation and to ensure full participation in the Common Agricultural Policy (CAP). The link between MARD policy, strategy and organisational structure and Phare assistance remains weak.

22 In the area of **cross-border co-operation** Phare assistance was highly relevant to the sector needs. Wider and immediate objectives were identified through the process of bi- and multi-lateral international consultations, and addressed fields of crucial importance to the sector. However, the risks identified in programming documents were not fully oriented towards possible operational problems, specifically difficulties of co-ordination between

⁹ Most Financing Memoranda were signed during last week of December, just before the expiry of the relevant financial envelope.

different authorities and potential non-availability of co-financing. In general, these risks did not materialise. However, other factors impacted on implementation that were not identified as risks (e.g. insufficient number of eligible offers during tendering, and bankruptcies of contractors during implementation).

23 The evaluated assistance to the **environment** sector was relevant to sector needs. The investment programmes should contribute to the reduction of water and air pollution; the institutional capacity building programmes should contribute to monitoring, control and regulation capacity and compliance with EU environmental directives. The quality of programme design was highly variable. Programmes that focused on a few or a single issue were more coherent than those seeking to address multiple issues.

24 In the **internal market** sector, the evaluated assistance addressed a range of issues spanning eight negotiation chapters. The assistance was highly relevant to sectoral needs. The programmes have contributed positively to the implementation of a range of EU directives, including the New Approach Directives and those concerning market surveillance, pharmaceutical registration, copyright protection, competition, consumer protection, telecommunication and audio-visual policy. However, progress was limited in the area of audio-visual policy due to external factors rather than any deficiencies in Phare programming.

25 The evaluated assistance for **justice and home affairs** and **public administration development** was highly relevant to sectoral needs, and addressed areas of crucial importance identified in the Action Plan on Strengthening of Administration and Judiciary in Poland (of April 2002). However, planning and programming documents still need improvements. They do not give sufficient guidance to implementing agencies about expected outputs. Indicators of achievement for Phare 1999 were poorly drafted, but there has been a progress in Phare 2000, 2001 and 2002.

26 Phare programmes assisting the **regional development** and **transport** sectors were highly relevant to sector needs. Wider and immediate objectives are well structured, addressing fields of crucial importance to the sector (e.g. development of regional and sub-regional transport infrastructure, investment in environmental infrastructure, active employment policy, and support for small and medium-sized enterprises (SME)). The assistance builds upon the achievements of earlier Phare programmes. The indicators of achievement for the 2001 Economic and Social Cohesion (ESC) programme are well developed and can be used as a managerial and monitoring tool.

2.2 Efficiency

27 In half the monitoring sectors, Phare assistance was implemented with acceptable efficiency, but there were major shortcomings in the other half (**agriculture, environment, public administration, and regional development**).

28 The implementing agencies were mostly experienced and staffed with personnel properly skilled, trained and experienced in Phare programme implementation. Beneficiaries at central and regional level were usually well prepared for absorption of the EU funded assistance. However, beneficiaries at local (*gmina*) level were often not prepared for co-operation with EU structures and they did not have sufficient administrative and institutional capacity to cope with EU standards of project management, monitoring and implementation.

29 The introduction of the PRAG regulations at short notice caused many problems for implementers across all sectors, with particular problems noted with investment projects. The complexity of procedures resulted in delays for many projects. The low quality of submitted documents (technical specifications, tender dossiers, tender evaluation committee's reports) and the time-consuming procedures for revision and approval resulted in late contracting (within last two months of the contracting period) and frequent requests for extension of disbursement period.

Elements negatively affecting efficiency of Phare support:

- Direct beneficiaries at local level insufficiently prepared to absorb EU funded assistance;
- Low quality of submitted documents;
- Co-operation is ineffective and inadequate between various parties involved in different stages of project programming, planning and implementation.

30 Efficiency was significantly limited by inadequate co-operation between various parties involved in the different stages of project programming, planning and implementation, between different levels of state administration, and between central, regional and local government structures. An inefficient system of exchange of information between involved parties also negatively affected project implementation. This affected particularly regional development and public administration programmes.

31 The efficiency of Phare **agriculture** programmes varied significantly, but most were implemented inefficiently. The contracting of investment components for all 2001 programmes is delayed and there is a high risk of failure. Although the same situation pertained for 2000 programmes, lessons do not appear to have been learned. Late availability of co-financing in 2002 impacted adversely on timing and delivery of outputs and hence efficiency, particularly for 2000 programmes.

32 The implementation of **cross-border co-operation** programmes for all border regions was well organised and properly managed. Although largely progressing in accordance with agreed plans, projects suffered from limiting factors, such as late contracting, delayed payments to the contractors and frequent bankruptcies of the contractors. Project monitoring was initially poor, but is improving.

33 The implementation of Phare programmes in the **environment** sector is well organised and in principle properly managed. However, the efficiency was rated "Unsatisfactory" as implementation of environment programmes was delayed due to:

- the beneficiaries' inexperience of preparing tendering documentation, necessitating repeated corrections;
- difficulties in obtaining construction permits;
- difficulties with securing twinning partnership, and the time needed to draft twinning covenants.

34 The efficiency of the assistance provided for **internal market** sector varies significantly between programmes, but on average was rated as "Satisfactory". There are programmes managed highly satisfactorily (PL-0102.09 '*Chemicals directives and administration*'), but at the same time efficiency of management of other programmes (PL-0003.07 '*National SME development*' and PL-0102.06 '*Audio-visual Policy*') was evaluated as "Unsatisfactory". Many of the programmes were implemented against a background of legislative and institutional changes. The necessary restructuring was achieved in support of programme implementation. There were some difficulties with the procurement of specialist equipment.

35 Phare assistance for the **justice and home affairs** sector was managed efficiently. The implementation of the evaluated programmes progressed in accordance with agreed plans, and was properly organised, although suffering slightly from late contracting. The latter reflects the late preparation of the necessary tender documentation and in some cases inadequate quality of the initial version of documents prepared by the beneficiaries.

36 Efficiency of Phare assistance provided to **public administration** sector was hardly sufficient. Programmes assisting with the preparation for EU structural and cohesion funds had to contend with the difficulty that many interrelated and independent elements needed to be put in place within a tight time frame and as programming and structures evolved. However, the 2001 programmes demonstrate an efficient use of resources and are characterised by flexibility and responsiveness to needs. *Access 2000* had liquidity problems and the 2001 grant schemes suffered delays partly due to unsuccessful TA contracting.

37 **Regional development** related programmes were not efficiently managed. The system of ESC programme implementation, prepared as a pilot for EU structural funds, is more complicated than the standard Phare system. There is therefore a need for co-ordination of activities by different Polish participants of the system (the MoELSP, implementing agencies, *Marshall* Offices, *Voivodship* Offices, and direct beneficiaries). Most activities under the 2000 ESC programme were contracted at the very end of the

Major delays in Phare-supported projects that have impact on efficiency:

- Excessive time required to obtain construction permits;
- Late contracting, requiring re-issuing of construction permits (valid only two years);
- Land acquisition problems with large infrastructure projects (particularly road transport sector);
- Problems with identification of appropriate twinning partner, resulting in late signature of twinning covenants;
- Delays in investment components have a 'knock on' effect on institution building components.

contracting period, making in many cases extension of the disbursement period necessary. The 2001 ESC programme will also be contracted at end of the contracting period. However, the *Flood Damage Reconstruction* project under PL-0112 is implemented efficiently and progresses according to agreed plans.

38 Efficiency varied significantly within the **transport** sector. Phare 1999 activities are producing cost-effective results, but some difficulties with 2000 projects adversely affected the efficiency of implementation, and there are delays in contracting 2001 projects.

2.3 Effectiveness

39 Five of the eight monitoring sectors were rated satisfactory for achievement of the programme objectives (**cross-border co-operation, environment, internal market, justice and home affairs, and public administration**). Two sectors were rated unsatisfactory (**regional development and transport**). One sector, **agriculture** was rated just sufficient.

40 A continuing problem reducing effectiveness and sustainability, particularly in institutional capacity building, is co-financing, where commitment and conditionalities were not always respected. Although Poland contributes significant co-financing, its provision to cover equipment or software has been problematic at times. In one case in the **environment** sector, Phare funding value M€ 8.1 was lost as a result of insufficient co-financing. On occasions, there was an expectation that shortcomings in local performance would be met with increased Phare funding.

41 In the **agriculture** sector, effectiveness of the assistance provided was poor in the veterinary area, as the preconditions for implementation were not met. The joint Phare/EBRD *Dairy Facility* (PL-9906.03) proved to be unattractive to potential beneficiaries and failed to realise its objectives. Also of particular concern has been the lack of impact in the crucially important 2000 project supporting the Integrated Administration and Control System (IACS), needed to be able to use CAP funds. The effectiveness of PL-0006.07 Food control administration and PL-0102.04 Food safety system was limited by unclear division of responsibilities for food safety between the MARD and the Ministry of Health. For Phare 2001, limited progress has been made towards achievement of objectives because of delays in contracting. Early warning notes have been issued about expected substantial risks affecting achievement of objectives for projects aimed at Animal Feeds Control System, IACS and Border Inspection Posts (veterinary legislation).

42 Implementation of Phare assistance provided throughout the **cross-border co-operation** sector is effective. Phare 1999 activities made good progress towards the achievement of immediate objectives. For Phare 2000 and 2001, however, limited progress has been made because of late contracting.

43 **Environment** sector Phare programmes were implemented effectively. The investment projects will achieve their objectives and, to a greater or lesser extent, contribute to reducing pollution. Despite setbacks, it is likely that most institution building projects will achieve most of their objectives, but this is more doubtful for programmes that have weak design (PL-0105.02 European Natura 2000 Network and PL-0105.07 Strengthening the local environment administration) or have suffered serious delays (PL-0007.03 Pollution Prevention and Control at Regional Level).

44 Most programmes in the **internal market** sector will achieve their objectives. Good progress is being made with the implementation of the New Approach Directives but non-procurement and the risk of non-procurement of specialist equipment limits the effectiveness of those programmes. The first wave of notified bodies are expected to be operational following the imminent Protocol for European Conformity Assessment (PECA) negotiations. Although good progress is being made, further strengthening of the institutional capacity for market surveillance is needed. The central and regional SME support system has been strengthened but, without an extension, it is highly optimistic that the increased funding of the SME grant schemes can be committed. The employment creation measures were not as successful as expected, due mainly to changes in the economic situation. An early warning note was issued referring risk that the *Audio-visual Policy* project (PL-0102.06) will not achieve its objectives.

45 Phare assistance provided to the **justice and home affairs** sector is effective. Projects assisting management of Poland's eastern border and visa policy were implemented effectively and contribute towards the achievement of immediate objectives. Activities providing support for the fight against organised crime, when completed, will satisfactorily contribute to the achievement of their immediate objectives. Although the implementation of activities supporting infrastructure at the border crossing points was affected by late contracting, there is no reason why these projects should not achieve their immediate objectives. Eastern border small projects facility was implemented according to agreed timelines and satisfactorily contributed towards the achievement of the immediate objectives.

46 Effectiveness of assistance provided under Phare programmes for the **public administration** development sector varied between projects. Assistance provided under 1999 programmes was effective. The 2001 programmes assisting with the development of the capacity to administer EU structural funds have already achieved good impact. Immediate objectives were achieved under previous programmes supporting NGOs and this is likely to be repeated.

47 The overall effectiveness in the **regional development** sector was rated as weak, because the assistance provided under 2000 and 2001 ESC programmes, which represent a large part of the evaluated programmes in this sector, was significantly limited by late contracting. However PL-0003.13 '*Strengthen regional policy administration*' certainly strengthened capacities of the regions to effectively manage Structural Funds. PL-0112 '*Flood Damage Reconstruction Programme*' will also achieve its objectives.

48 Assistance provided to the **transport** sector was implemented ineffectively, although the detailed rating substantially differs between projects and sub-sectors. Investment projects in road and railway transport were implemented very effectively. However, due to unsuccessful contracting procedures relating to the digital tachograph component, the entire PL-0003.09 Transport administration and *acquis* project will not achieve all its immediate and wider objectives. Activities aimed at restructuring of Polish Railways (PL-0101.03) are implemented slowly and ineffectively. Early warning notes were issued in respect of the PL-0003.09 and PL-0101.03 projects.

2.4 Impact

49 In spite of the difficulty to assess impacts at the time of IE, a number of programmes have investment components that are expected to have a significant beneficial impact, in particular in the **environment** sector. The majority of projects are still under implementation, but some have resulted already in a reduction of air and water pollution in various part of Poland. Phare activities supporting the **agricultural** sector have had limited impact. In particular the PL-9906.03 Joint Phare/EBRD *Dairy Facility* failed to attract the planned number of participating dairies. At the time of the last interim evaluation (cut-off date 31 March 2003) the long-term impact of PL-0104. 04 *Organic Farming* was questionable, as the activities implemented were insufficiently supported by actions undertaken by the Government.

50 Due to good programming and relevant programme design in the **cross-border co-operation** sector, the impact of the assistance delivered will be in line with the plans. The immediate objectives are well designed to contribute to support the progress towards the achievement of wider objectives.

51 The Phare programmes supporting the **internal market** sector are expected to produce a satisfactory positive impact, and will assist Poland's competitiveness and institutional capacity as a partner in the single internal market. Improvements in the SME sector will assist Poland complete the transition from command to market economy.

52 In most cases the full impact of the Phare assistance to the **justice and home affairs** sector will be only measurable a few years after project completion. However, due to the good programme design, where immediate objectives directly contribute towards the achievement of wider objectives, the impact of the evaluated assistance is likely to be in line with the plans.

53 Phare assistance for the **public administration** sector is producing moderate impacts. More and sustained progress needs to be made to achieve a fully functional system able to absorb Structural Funds is particularly important for Poland's immediate future.

There are two key elements supporting good impact of Phare assistance:

- appropriate programming process and good programme design, where immediate objectives directly contribute to the achievement of the wider objectives;
- Phare assistance plays only a supplementary part in a larger action of the Polish authorities;

54 Most of the evaluated programmes supporting the **regional development** sector in Poland were still under implementation and it was too early to evaluate impact. In many cases, impact assessment will be possible only a few years after project completion (transport and environmental infrastructure projects).

55 Assistance provided under the Phare 1999, 2000 and 2001 programmes supporting the **transport** sector in Poland should provide a tangible and in some cases significant impact at both the regional and state levels, particularly in the field of maritime safety, investment in transport infrastructure and strengthening of the administrative capacity and legislative alignment in transport.

2.5 Sustainability

56 The prospects for sustainability for all the evaluated programmes are mixed. Much depends on the long-term commitment from the Polish Government, further progress towards harmonisation with EU legislation, and the availability of State budget funds to meet revenue and co-financing commitments.

57 The sustainability of the assistance provided for the **agriculture** sector is acceptable. The sustainability of results produced by investment components should be high with a few exceptions, which are threatened by institutional anomalies, such as PL-0006.05 *Border Inspection Posts Phase II*. The results of 2000 and 2001 twinning and technical assistance (TA) activities should be sustainable, but only if the absorption capacity of beneficiary institutions is increased.

58 In general, the sustainability of Phare assistance for the **cross-border co-operation** sector is satisfactory. Sustainability of results produced by investment projects should be high. Sustainability of projects addressing people-to-people and business-to-business relations depends on continued efforts and stable policy on both sides of the border.

59 Under the **environment** sector, investment projects that will generate revenue should be sustainable through customer receipts. For other investments sustainability will be dependent on maintenance budgets. Pilot programmes could see sustainability through replication but this is likely to require external support. The results of the institution building programmes would best be sustained through the development and implementation of a human resources development strategy.

60 The results of the Phare assistance to the **internal market** sector are sustainable. There is every indication that the government will continue to support governmental institutions. Other institutions, which will have to compete in the market, will have to refocus their activities but should be competitive enough to ensure their sustainability.

61 In the **justice and home affairs** sector, sustainability of the border crossing point infrastructure should be high. Sustainability of information technology infrastructure depends on future allocations for necessary updates and modernisation of the equipment. Sustainability of twinning projects depends on continued funding, stability of staffing, and further legislative progress.

62 The Phare assistance provided for the **public administration** sector is expected to produce sustainable results. There are now indications that systems and structures for the administration of EU structural funds are being established at central level and that they will receive continued support from the government. The activities undertaken by NGOs should enable them to raise their profile and therefore should help secure future support.

63 The evaluated assistance for the **regional development** sector should be sustainable. Sustainability of infrastructure should be high. Sustainability of the institution building projects depends on long-term commitment of the Polish authorities to develop capabilities of the relevant services and on stable employment policy. Sustainability of results achieved under Human Resource Development (HRD) and SME projects depends on general economic situation in Poland and labour market and social policy of the Polish government.

64 Results of the assistance provided for the **transport** sector should be sustainable. However, in the longer term, sustainability of infrastructure will depend on commitment and funding for maintenance and renovation. This, to a large extent, will depend on whether or not an economically realistic pricing policy is introduced, enabling the operators of the facilities to generate enough funds for such actions.

2.6 Rating

65 The following ratings have been given to the different sectors of the Phare National programme:

Criterion Sector	Relevance	Efficiency	Effectiveness	Impact	Sustainability	Overall rating
Agriculture	1	-1	0	1	0	Unsatisfactory
Cross-Border Co-operation	2	0	1	1	1	Satisfactory
Environment	2	-1	1	1	1	Satisfactory
Internal Market	2	1	1	1	1	Satisfactory
Justice and Home Affairs	2	1	1	1	1	Satisfactory
Public Administration Development	2	0	1	1	1	Satisfactory
Regional Development	2	-1	-1	1	1	Unsatisfactory
Transport	1	0	-1	1	1	Satisfactory

<i>Unacceptable</i>	<i>Poor</i>	<i>Sufficient/ adequate or no rating possible</i>	<i>Good</i>	<i>Excellent</i>
-2	-1	0	1	2
<i>Highly Unsatisfactory</i>	<i>Unsatisfactory</i>	<i>No rating possible</i>	<i>Satisfactory</i>	<i>Highly Satisfactory</i>
<i>HU</i>	<i>U</i>	<i>N/A</i>	<i>S</i>	<i>HS</i>

66 A summary of the ratings for each IE Report is given in Annex 3, together with the value for each cluster. In Poland, 66% of the total value of the Phare assistance evaluated was rated 'satisfactory', and 34% 'unsatisfactory'. Despite the differences in sectors, overall it can be concluded from the IE reports that the performance of Poland has been average.

3 KEY FINDINGS/CROSS CUTTING SUBJECTS

3.1 Type of assistance

Technical Assistance.

67 Technical assistance (TA) has been generally effective. Most contractors have reacted flexibly and efficiently to changing circumstances, and shortening timescales. However, in some cases TA contractors were not able to provide the services at the required level (PL-0009 and PL-0108 Poland-Germany CBC programmes). Also in the case of regional development sector, beneficiaries faced problems with the appropriate quality and timing of the TA assistance. However, after the necessary corrective actions were undertaken, the new TA contractor under PL-0106 is providing the beneficiaries with appropriate assistance.

Twinning

68 Twinning has been successful in Poland. The Pre-Accession Advisors (PAA) and short-term experts were generally very experienced and were able to ensure the appropriate transfer of know-how, skills and knowledge in the field of their expertise. A particularly good example is PL-0003.13 '*Strengthen regional policy administration*', implemented within the framework of eleven twinning projects. Knowledge and experience on how to manage EU structural funds was transferred to Polish regional and local authorities, and long-term relations between Polish regional authorities and their equivalents in various EU member states were established.

Principal positive results of Twinning are:

- EU MS staff have, with a few exceptions, been highly experienced and helpful;
- Transfer of knowledge has been efficient;
- Long-term relationships have been built between Poland and EU Member States.

69 However, there were shortcomings in some twinning arrangements. In the case of PL-9905.04 *State Aid control*, due to lack of available experts on State aid in the member states, the signature and endorsement of the twinning covenant (TC) was delayed by 14 months, affecting all activities. Late endorsement of the TC delayed the preparation of the tender dossier for computer equipment and information technology systems so that

Twinning projects faced major difficulties when:

- Beneficiary had no clear vision of expected results and effects of the Twinning assistance;
- MS Twinning partner had insufficient knowledge and understanding of the Polish situation and tried to directly copy into Poland solutions working in the MS of his/her origin;
- Twinning project covered too complex area, and its objectives were over ambitious comparing to available time and resources;
- Objectives of the Twinning project were poorly formulated and/or skills and knowledge of the MS Twinning partner were inappropriate to the objectives.

contracting was no longer possible under the project. For State Aid, the PAA had insufficient experience and there was insufficient dialogue between the Polish and Swedish sides.

70 The Special Preparatory Programme in Poland was very ambitious and extremely complicated (8 PAAs and 6 Member States involved). Some of the project objectives (particularly the establishment of a legal and administrative basis for ISPA and SAPARD, Structural and Cohesion Funds) were not achieved. To a large extent this was due to the project complexity, in particular, the lack of clarity in procedures, administrative capacities, scope of competences and the role of organisations at regional level.

Investment in infrastructure.

71 The Phare programme is expected to be an effective and efficient tool to implement investment in infrastructure projects. Ongoing projects, mainly in the field of transportation and environment protection, when completed, will produce visible and sustainable results.

72 However, there were some significant shortcomings in the implementation of investment projects. There were problems with completion of documents necessary to commence construction activities (e.g. construction permits for PL-9907.02 *Bytom Waste Water Treatment Plant*) and with timely preparation of tender documentation of sufficient quality.

Implementation of infrastructure investment projects was negatively affected by:

- Delayed preparation and low quality of tender documentation;
- Difficulties related to land acquisition;
- Problems with obtaining (and validity) of necessary construction permits;
- Complicated procedures and time consuming system of document circulation;
- Poor co-operation between institutions involved in project implementation at various stages (programming, design, implementation, management, monitoring, supervision);
- Delayed payments to contractors.

73 The biggest problem in transport infrastructure projects, was with land acquisition. For example, PL-0008.05.04 '*Road to airport of Katowice*', was delayed due to significant problems with land acquisition and finally, in order to start project implementation, it was necessary to divide the project into two parts, where the Phare-assisted part was free of the land acquisition problem.

74 Implementation of some investment projects was delayed by the bankruptcies of contractors (for example, PL-9913.08 *Sewage treatment network for Dobra community*, Lot 002 and PL-9917.01 *Waste Water Treatment Plant in Ploty*) that led to the necessity to change contractors, and prepare and sign addenda to the relevant documents. The above situation reflects the general weakness of construction companies in Poland, but also reflects weakness of the tender evaluating system, which is based on the lowest-price principle.

75 Implementation of investment projects often suffered from delays due to late payments to the contractors. In some cases (PL-0008 ESC 2000 programme) this resulted from concentration of contracting into the last part of the contracting period, added to problems created by a complicated implementation system, time-consuming circulation of financial documents, weak prediction of expenses, and formal requirements of Phare rules for requesting transfer of funds from CSHQ to the NF ("trigger point").

Supplies.

76 Provision of equipment was a significant part of the expenditure in the home affairs and agricultural programmes. The equipment purchased under 1999 programmes is operational. Supply contracts are generally implemented supplementary to twinning and investment projects, and therefore effectiveness and impact of the supply contracts often depends on the efficiency, effectiveness and results of the "main" form of the assistance (in this case IB) provided to the beneficiary. For example, under PL-0005.09 '*Fight against drugs*', the planned investment element was conditional on the nomination of the members of the Council for Counteracting Drug Addition (CCDA) and the adoption of the National Drug Strategy 2000-2005. The nomination of members of the CCDA and the adoption of the strategy occurred very late, so that the tender for the investment project was not successful due to the late launch of the tender.

77 Some supply projects faced significant problems because the beneficiaries had difficulties in preparing compliant technical specifications. Another frequent problem was poor analysis of the supplier market and proposing lots that could not be addressed by suppliers. In some cases the quality of supplied equipment was far below the specifications and it was necessary to cancel the contract and re-allocate funds to another programme.

Small Grant Schemes

78 The “*Small-scale infrastructure investment*” projects financed under the PL-0008 ESC programme were of particular relevance to the beneficiaries’ needs. They supported projects of local and sub-regional importance, but the effects

‘The 2000 Small grant schemes, targeted at local level have had a wider effect and acted as ‘pilot projects’ for EU structural fund implementation’

of these projects are much wider. Beneficiaries appreciate the value of the projects extremely highly. Text box here. If understood as “pilot projects” and as an element of the experience gathering process for EU structural fund implementation, this is an effective way to improve beneficiaries’ skills, knowledge and institutional capabilities. These projects, which directly affect people in smaller municipalities and *gminas*, have high visibility and play an important educational role in preparation of Polish citizens for integration with the EU. Such projects are no longer financed under the subsequent 2001, 2002 and 2003 regional development programmes.

79 Assistance provided under 2000 and 2001 ESC programmes (PL-0008 and PL-0106) gives support to activities of SMEs through the small investment grants scheme, which co-finances small grants (from 5,000 up to 50,000 €). The investment grants are tied directly to bank loans (every applicant must co-finance the grant from bank loan). For Phare 2000, all the SME-related activities were contracted on 30th November 2002 (the last day of the contracting period) and should be completed by 31st August 2004. Although beneficiaries expressed their interest in participation in investment grant schemes, this interest was limited by the difficulties of participation (the necessity of a bank loan and the difficulties of obtaining it, finance only for brand-new equipment, late start of the scheme, etc.). As the investment grant scheme is relatively more popular than other SME related activities, it was allocated unused funds from other ESC 2000 components (savings from infrastructure investment projects and HRD).

80 The implementation of Small Project Fund (SPF) for all eligible border areas (Poland-Germany, Poland-Czech Republic, Poland-Slovak Republic, and the Baltic Sea region) was delayed by complicated, time-consuming and unclear procedures, differing from year-to-year and from border-to-border. The implementing agencies had to dedicate significant resources every year to prepare guidelines for SPF projects. The beneficiaries were disorientated by the changing rules and regulations, which reduced the effectiveness of the SPF projects.

ECOSOC

81 The system of ESC Programmes implementation in Poland is complex and the need for co-ordination of activities taken by different Polish participants of the system (Ministry of Economy Labour and Social Policy (MoELSP), Implementing Agencies, Marshall Offices, Voivodship Offices, direct Beneficiaries) is evident. Effectiveness of the assistance provided under 2000 and 2001 ESC Programmes is significantly limited by late contracting, however even there it is possible to assume that in most cases the assistance – within extended disbursement period – should achieve most of its immediate objectives. Phare programmes have already strongly improved the capacity to administer the Structural Funds. The system

developed, although complex, has been tested and shown to work. Sustainability of the results achieved under the infrastructure investment projects should be high, while for other projects – depending on future actions undertaken by the Polish authorities – should be satisfactory.

3.2 Purpose of assistance

Harmonisation of legislation

82 Good progress has been made in the adoption and harmonisation of legislation required by the *acquis communautaire* in all sectors, and most of the basic community regulations has been adopted in Polish law. Consequently, Poland has been accepted as a future member of the EU at the Copenhagen Conference in December 2002. However, it is recognised that significant work is still required in harmonising legislation in the sectors of veterinary control, environment and food safety.

Institution building

83 In the sectors evaluated since August 2001, there has been significant institutional building, and enhancement of administrative capacity. Since the European Commission launched twinning as the main instrument in 1998 to assist candidate countries in strengthening their administrative capacity, there has often been a perception that assistance for institution building was only through twinning projects.

84 As the member state administrations and public institutions have specific knowledge and experience concerning the implementation and enforcement of EU law, the introduction of twinning had a positive impact on Polish administration and acted as a catalyst in the process of legal harmonisation and of the adoption of the *acquis*. The collaboration of specialists from Poland and member states established foundations for long-term co-operation between Polish and member state institutions.

85 However, the institution building through twinning had also some shortcomings, including unrealistic and over-ambitious objectives or guaranteed results, insufficient local commitment and ownership (twinning projects were sometimes recognised as a “price paid for investment projects”), and management shortcomings in the member state administration.

Project preparation

86 Before 1999, projects had, in general, been poorly prepared, and Phare therefore funded a project preparation facility under PL-9918 (only for ESC programmes) to help with the preparation of feasibility studies, which would be pre-conditions for the 2000, 2001 and 2002 Phare programmes. There were also TA projects under PL-0008 ESC 2000 and PL-0106 ESC 2001 programmes aimed at facilitation of the project implementation process, increasing the impact of Phare ESC programme and support to the implementing agencies and beneficiaries in developing and strengthening their programme/project management, monitoring and supervision capacity at regional and national level. The projects, although facing some difficulties and showing shortcomings (insufficient quality of advice by the contractor, lack of appropriate communication channels between the parties involved, insufficient co-operation between beneficiaries and the TA contractor, etc.) showed that this kind of assistance is of great value for both beneficiaries and implementing agencies and should play an important part in the process of Poland’s preparation for effective and efficient implementation of EU structural funds.

3.3 Administrative and Judicial Capacity

87 Poland has made good progress in improving its administrative capacity to implement and enforce the *acquis*, although further improvements are still necessary. Actions planned by the Polish side to increase judicial and administrative capacity are presented in the “*Action Plan for strengthening the administration and judiciary in Poland*” approved on 16th April 2002 by the Polish Council of Ministers. Evaluated Phare programmes provided assistance for the process of increasing the administrative and judicial capacity in Poland and had a positive impact on Poland’s preparation for membership.

3.4 Public Administration Reform

88 The evaluated assistance provided to the public administration sector addressed a wide range of issues and continues to support initiatives defined at the onset of the Phare programme in 1989. The programmes address the priorities of the public administration sector and include institution building projects aimed at: (i) strengthening the capacity of the Polish public administration to implement the *acquis*; (ii) preparing Polish central, regional and local administration to programme and implement EU structural and cohesion funds; and (iii) support the development of civil society and the integration process.

89 Implementation has run later than planned and the efficiency of programme implementation was variable. Although some programmes have suffered significant delays, most twinning partnerships proceed in accordance with the agreed schedule. Improved financial planning and controls should have a positive impact, leading to savings in the state budget and help with economic development. The establishment of systems to absorb EU structural funds is particularly important for Poland’s immediate future. For a number of programmes, impacts will only be apparent in the future, and only if decisions are made at a higher level and strategies adopted.

90 If procurements are successful most programmes will achieve most of their objectives. The availability of more extensive socio-economic data and development of management systems should improve financial planning, supervision and public debt management with consequent benefits to public finance and facilitating reporting to European Union requirements. Where programmes provide advice and recommendations the benefits can only be realised if decisions are taken at a higher level and translated into actions, e.g. for PL-0101.08 and PL-0101.04. For PL-0102.07 co-operation is required between the Polish Customs Service and the Agricultural Markets Agency to establish operational structures and procedures concerning agricultural products at border crossings. For a number of programmes the full benefits may only be apparent in the medium or longer term e.g. the training strategy under PL-0102.07, and improving public confidence and trust in the tax administration. (No. R/PL/PAD/03.099)

3.5 Comparison of present situation with that at time of previous CAR

91 The major difference between the present situation and that at the time of the previous CAR (March 2003) is the closeness of accession. This has focussed attention on key areas such as financial control, the future external border of the EU (policing, veterinary and phytosanitary control), and the capacity to use EU funds (especially under CAP and structural and cohesion funds), where the objectives need to be achieved by May 2004. Whereas before 2001, delays in programmes could be accommodated, and CSHQ allowed a certain number of extensions to the commitment or disbursement period, now delays can have very serious consequences, and CSHQ is being very strict in maintaining the original deadlines for commitment and disbursement. Another difference is the extensive use of twinning.

3.6 Analysis of actions taken in response to the recommendations in previous CAR

92 A full description of the identified actions taken, which can be indirectly linked with the recommendations in the previous CAR, is given in Annex 1. In the course of the interim evaluation exercise the Evaluators have identified corrective actions taken by both ECD and Polish authorities that are in line with the suggestions recommended in the previous CAR. In some cases, due to changed environment, re-focused Phare assistance and/or changed priorities and Phare implementation system, the recommendations are no longer relevant.

93 Introduction of PRAG can be understood as implementation of the recommendation asking for introduction of sound project appraisal procedures (project documentation not meeting PRAG requirements is not approved by the ECD).

94 The project implementation and management system is still subject to continuous changes, modifications and clarifications. Recently the attention of the Polish side focused on the development of the project identification, selection, implementation and management system for EU structural and cohesion funds. This system has been tested through implementation of the 2000 and 2001 ESC programme, which proved that the system, although relatively complicated, works. However, it still needs additional improvements and clarification of responsibilities and establishment of information exchange channels.

95 Some recommendations were addressed by actions taken by the Polish authorities and by CSHQ, and can be considered as fully implemented:

- Conditionality, where well structured and clearly stated, are effectively enforced by the ECD;
- Although there is still room for minor improvements, the number and structure of agencies directly responsible for management and implementation of Phare programmes has been largely optimised;
- More assistance is directed to support large infrastructure projects in order to achieve effects that are visible and can result in improved quality of local/regional environment. However, some projects are still accompanied by over-ambitious and excessively broad objectives.

96 Some problems remain and need to be addressed:

- The quality of Monitoring Reports is still insufficient and needs improvement. The NAC currently prepares a 'sector sheet' to complement individual project monitoring reports;
- Notwithstanding significant progress in the matter, there is still a need for better identified and more precisely stated indicators of achievement of programme/project objectives;
- Problems with project cash flow still need to be solved.

4 CONCLUSIONS AND RECOMMENDATIONS

REF:	CONCLUSION	SEE PARA#:	RECOMMENDATION
1	The SMSC focuses its attention on current activities and operational problems affecting implementation of particular Programmes, and is not provided with a sectoral overview.	13	<ul style="list-style-type: none"> SMSC should be more focused on sectoral problems rather than on managerial problems faced by particular projects.
2	The Monitoring Reports do not provide sufficient factual basis for this Interim Evaluation, as well as information on the progress of implementation to other bodies, such as the ECD, CSH and SMSC.	13	<ul style="list-style-type: none"> Time-gap between MR's cut-off date and the date of SMSC meeting should be reduced by both, more effective MR's preparation and by avoiding concentration of all SMSC within one/ two weeks UKIE should re-consider whether or not the current template for MRs should be revised and replaced by more relevant to needs; Additional training for those involved in the MRs preparation is required in order to increase their knowledge on monitoring methodology, terminology, aims and expected results.
3	Although there is significant progress in quality of programming documents, there is still need for better developed indicators of achievement of programmes objectives and for establishing of an on-going system of monitoring progress towards the achievement of the objectives of the assistance.	20	<ul style="list-style-type: none"> Beneficiaries should be provided with sufficient training on possible use and ways of identification of indicators of achievement; System for monitoring and measurement of progress towards the achievement of the objectives of assistance during the life of projects and after that, until the objectives are fully met, should be established and maintained by the Polish authorities.
4	Precise structure for the interim evaluation run by Polish authorities has not yet been agreed and there is still lack of financial resources to cover the IE exercise. Additionally, currently the interim evaluation process has had little impact on either the CSH, ECD or the Polish beneficiaries.	6	<ul style="list-style-type: none"> Current IE system lacks clear definition, whether it is expected to be used as a managerial tool (then: it should be 'assessment' rather than 'evaluation' system), and therefore its impact on key stakeholders is limited. UKIE should revise and re-construct the interim evaluation concept with a view to increase its impact on key parties involved in Phare implementation.
5	Objectives are often over ambitious considering the timelines and the financial and technical inputs provided for their achievement.	20	<ul style="list-style-type: none"> Objectives of the assistance should be identified and defined keeping in mind the value of the assistance and potential impact of implemented projects.
6	For most of Phare programmes in Poland, the contracting process, comparing to timelines presented in programming documents, is significantly delayed	29, 37	<ul style="list-style-type: none"> The analysis of the purposes of the delayed contracting should be carried out and conclusions presented during the next SMSC meeting; Financial procedures (including "trigger point" rule) should be reviewed in order to find the appropriate way to simplify the existing procedures.
7	Preparation of Polish authorities to programme and implement Structural Funds, Cohesion Fund and instruments of Common Agricultural Policy creates the most important	41,47, 53	<ul style="list-style-type: none"> Phare assistance should be focused on facilitating the introduction of Structural Funds and Cohesion Fund implementation during the Transition Period (2004-2006); UKIE and ECD should carefully monitor preparation for CAP measures implementation

REF:	CONCLUSION	SEE PARA#:	RECOMMENDATION
	challenge for the Polish administration.		(with particular attention for IACS development), and – if necessary – decide on corrective actions, including re-allocation of funds from other Phare projects to support IACS implementation.

5. KEY LESSONS LEARNED AND GOOD PRACTICE

LESSON 1: Good programme design requires:

- a). the presence of a clear national policy or strategy adopted by the relevant authorities;
- b). the involvement of all stakeholders;
- c). realistically stated objectives of the assistance, with the expected results proportional to the available resources;
- d). a practical knowledge of Project Cycle Management and the development of a logical framework, including indicators of achievement.

a). National policy or action plan. It is recognised that in the situation where there is an adopted national policy/sectoral strategy, it is easier to design the Phare intervention in line with the sectoral needs and in a way that is complementary to the national budget funded actions. Even in particularly complex sectors (like regional development) use of existing strategies (even if far from perfect) has helped to make Phare assistance relevant to the sector needs. However, a national strategy may be difficult to develop in the complex areas either due to a lack of political consensus, or because the EU requirements are not clear. There is an opportunity for line DGs and the current EU Member States to produce road maps to assist new member states both in the development of national strategies, and in programme design.

b). Involvement of stakeholders. In programmes involving a single centralised implementing agencies, it is relatively easy to involve all stakeholders. However, there have been problems where more than one ministry is involved, or where implementation is to take place in the regions (see 36). It requires a strong co-ordinating body to insist that all stakeholders are involved in the process of programming assistance. A particularly good example of all stakeholders' involvement is the cross-border co-operation programmes (see 22), where the design process involved not only local, regional and national consultations but also bi- and multi-lateral consultations.

c). Realistically stated objectives. When the objectives of the assistance are unclear or are over-ambitious compared to the available resources (see 19) it is very difficult to link results of the assistance funded with progress towards the achievement of the stated objectives. Sometimes it is even difficult to link particular activities with the relevant objectives. The need to identify objectives that are clearly stated and proportional to the available resources is becoming understood among Polish authorities and those who are responsible for programming of the EU assistance in Poland.

d). Development of a logical framework (including indicators of achievement). Although project cycle management and the logical framework are cornerstones of Phare programme design, actual designs have in many cases been weak, with over-ambitious objectives and poor indicators of achievement. At the same time, implementing agencies consider that they are familiar with the techniques required. It is therefore necessary to broadcast the message that a theoretical knowledge of project cycle management and the Logframe approach is not sufficient on its own. Programme designers should have regular access to practical training in preparing Logframe matrices and selecting relevant indicators of achievement.

LESSON 2 – Where the problems of project implementation are so severe that the objectives will not be achieved, and there is no prospect of being able to save the project, it should be cancelled. There seems to be a great reluctance to cancel any project, however ineffective.

LESSON 3 - The success of twinning was due to a good understanding of the needs, institutions being ready for the changes envisaged, Pre-Accession Advisors good at project management and communication, dedicated staff on both sides, and highly experienced EU experts (see 68). However, in some cases implementation of twinning projects faced serious difficulties, when the beneficiaries had no clear vision of expected results, the Twinning partner had insufficient knowledge and understanding of the specific Polish situation or the twinning project was designed to cover a too complex area and had over-ambitious objectives (see 69).

LESSON 4 – Co-operation between the various parties involved in different stages of project programming, planning, management and implementation is crucial to achieve efficiency and effectiveness (see 30). Lessons learned in this respect during the implementation of 2000 and 2001 Phare ESC programmes were taken into account when structures and procedures for the future EU structural and cohesion funds were designed. ESC programmes have proved (see 36) that these structures, which are more complicated than the standard Phare structures, can be effective only when relationships between various parties involved at the regional level are properly defined and information exchange channels established.

LESSON 5 - The delay in contracting of Phare assistance results from low quality of tender documentation submitted to the ECD for approval, inappropriate format of submitted documents, inadequate advice for beneficiaries and from insufficient exchange of information between various institutions involved in the process of project selection/implementation. A long and time-consuming approval process by the ECD added up to 3-5 months to this process. To avoid this situation some implementing agencies provided the beneficiaries with technical assistance aimed at improving the quality of documentation prepared and submitted for approval to the ECD. This system has proved its effectiveness and should be considered for replication in all new accession countries.

LESSON 6 – Small-scale infrastructure investment projects financed under the 2000 Phare ESC programme (see 78) proved to be a very effective and efficient way to train a relatively large number of beneficiaries (compared with allocation), and familiarise them with structural and cohesion fund-type projects. These sorts of ‘pilot’ projects are recommended for the process of preparing new accession countries for the implementation of EU structural and cohesion funds.

ANNEXES

ANNEX 1. Response to recommendations from previous review (CAR)

Ref.	Recommendation	Action taken
4.1	<p>The Polish authorities should be advised to commit sufficient resources for programming, design, management and implementation of Phare programmes addressing the key accession-related areas. If necessary, technical assistance and training should be provided for Implementing agencies in such areas as project identification, logical planning matrix preparation, identification of proper indicators of achievement with quantification, benchmarking and timetabling, and project/programme monitoring. The Commission Services should not accept projects whose design does not meet these requirements.</p>	<p>The Polish authorities took some actions in line with this recommendation. Training on Project Cycle Management has been delivered. Technical assistance to beneficiaries was provided to improve quality of project documentation, in particular of tender dossier, and to speed up project implementation process.</p> <p>Notwithstanding significant progress, problem of proper identification and presentation of measurable and verifiable indicators of achievement is still unsolved. Recently, using knowledge and experience of EMS Evaluators, UKIE is trying to improve quality of indicators.</p> <p>The Commission Services are accepting projects with poor documentation, description and insufficiently detailed and/or precise presentation of conditionalities, risk/assumption analysis and badly designed indicators of achievement.</p>
4.2	<p>The Commission Services at the Delegation should address the continuing weaknesses in programme design through a process of identifying good practice, promoting it and disseminating it. This would enhance and build on the effects of the decentralisation of Monitoring, whereby the Implementing Agencies will themselves become aware at an early stage of design deficiencies and their impact on performance. Staff with particular expertise in this area should be identified and given responsibility for reviewing draft designs and advising on improvements.</p>	<p>Monitoring Reports do not fulfil their aim of providing SMSC, JMC and other relevant bodies/processes (including Interim Evaluation process) with reliable, coherent, well-structured and up-to-date information about progress in project/programme implementation. There is no information produced about sectoral development (presented in form of Sectoral Monitoring Reports).</p> <p>Some actions were taken to inform Polish authorities on desired results from monitoring (training, workshop) it wasn't enough. Recently, the Polish side plans to review template, content and process of Monitoring Reports, but results are unknown yet.</p>
4.3	<p>Supervision of the quality of the documents provided by beneficiaries is the responsibility of the Commission Services, and it is an extremely important element of the programme design process, strongly affecting future programme implementation. It also sets out the quality standards for the Beneficiary side. Therefore, the Commission Services should adopt sound project appraisal procedures that would allow comprehensive project assessment, including a review of its technical preparation, financing, identification and assessment of institutional and political risks, and a definition of programme management structures, with allocated Counterpart responsibilities.</p>	<p>Introduction of Practical Guide can be understood as response to this recommendation. The Commission Services, introducing Practical Guide regulations, approves only these project documents that meets requirements. However, due to low quality of documents submitted to the ECD for approval, ECD often refuses to accept these documents. Process of "improving" is extremely time consuming and causes delays in projects' contracting.</p> <p>On the other hand, the process of introduction the revised version of Practical Guide in June 2003 was far from being perfect.</p>

Ref.	Recommendation	Action taken
4.4	A general failure by the Commission Services to enforce those conditionalities that threaten withdrawal of Phare funds or refusal to make further commitments has undermined the serious nature of the commitment that the beneficiaries should make to effective programme implementation. The Commission Services should ensure that precise conditionalities are agreed with beneficiaries and built into Programming documents and are then rigorously enforced.	Generally, the conditionalities are still not precise enough and, therefore, very difficult to be enforced. However, it should be noted that in some cases the Commission Services very effectively and efficiently had enforced the conditionalities, refusing to accept next project stage before completion of the activities presented as conditional for the project implementation.
4.5	The Polish Government should be advised to strengthen and clarify project management structures. It is recommended to introduce a clear division of responsibilities for programme management between various agencies, including CFCU, National Fund, Implementing Agencies, UKIE and line ministries. In particular, the part played by UKIE and line ministries should be better defined, and UKIE should be encouraged to increase its direct involvement in programme management. If necessary, the Government should commit more resources (including human resources) to UKIE.	The implementation and project management system is still a subject of continuous changes, modifications and clarifications. Recently the attention of the Polish side focuses on development of the project identification, selection, implementation and management system for Structural and Cohesion Funds. This system has been tested through implementation of the 2000 and 2001 ESC programme, which proved that the system, although relatively complicated, works, but still needs additional improvements and clarification of responsibilities and establishment of information exchange channels.
4.6	The Commission Services should discuss with the Polish authorities how to optimise the number of agencies directly responsible for management and implementation of Phare programmes. Their structure and legal status should be carefully reviewed. It is recommended that a greater proportion of programmes should be managed and implemented by line ministries under direct ministerial supervision.	Number of Implementing Agencies has been significantly reduced and optimised. In some cases the legal status of the Implementing Agency needs still some changes/revisions to enable its development and better preparation for implementation of delegated tasks.
4.7	The Polish authorities are also advised to re-consider the general way in which some Phare programmes are implemented. It is worth considering whether a large number of relatively small projects having a small impact on a large number of beneficiaries is more effective and efficient than a smaller number of substantial projects able to significantly improve the situation for a more limited group of beneficiaries. Further, the Commission Services should be more realistic when defining programmes' objectives. Objectives should be in proportion to the scale of intervention. Therefore, it is strongly recommended to avoid the situation where over-ambitious and excessively broad objectives are developed for small-scale intervention.	The recommendation is in line with the general development of the Phare programme and, therefore, it is fully implemented.
4.8	In order to avoid the situation when cash-flow problems faced by the Commission Services at Headquarters block programme implementation, the Commission Services should pay more attention to realistic financial planning.	There are still problems with effective transfers of funds. This, on one hand, reflects difficult Phare regulations ("trigger point" principle), and, on the other hand, it results from poor financial predictions and cumulated contracting at the very end of the contracting period.

ANNEX 2. Response to recommendations from previous CSR (17 March 2003)

REF:	KEY ISSUE	RECOMMENDATION	Extract from JMC Minutes (14 April 2003)
1	Implementation is significantly delayed, and often results in need for re-allocation of funds.	<ul style="list-style-type: none"> Great care is essential to ensure that re-allocation is based on need and value, rather than capacity to quickly absorb additional funding. 	<ul style="list-style-type: none"> NAC disagreed with the EMS negative opinion concerning the reallocation of funds to particular programmes (SME).
2	Capacity to design and implement post accession programmes remains weak.	<ul style="list-style-type: none"> More training to local stakeholders on post accession programme design and implementation. 	<ul style="list-style-type: none"> In general agreed
3	The excessive time required to obtain construction permits is delaying Phare-supported public works projects in the environment, transport and regional development sectors.	<ul style="list-style-type: none"> Obtaining construction permits should be an enforceable condition of Phare programmes in Poland. Efforts should be made to extend the two-year time limit associated with construction permits. 	<ul style="list-style-type: none"> In general agreed
4	Co-financing conditionalities are not respected, leading to under-funded Phare programmes where the achievement of objectives is jeopardised. Current accounting systems result in a lack of transparency on the levels and types of co-financing.	<ul style="list-style-type: none"> Adherence to co-financing conditionalities. More transparent accounting procedures on co-financing should be developed. 	<ul style="list-style-type: none"> In general agreed
5	Frequent delays in finalising Twinning Covenants and lack of specific outputs.	<ul style="list-style-type: none"> Twining partners should be supported in their development of Covenants, with particular reference to Project Fiches and Financing memoranda. A properly designed LFM should form part of the Covenant. 	<ul style="list-style-type: none"> In general agreed
6	Supervision of Phare programmes provides inadequate information for key stakeholders.	<ul style="list-style-type: none"> SMSC meetings should be provided with a sectoral overview to complement individual project monitoring reports. Speedy preparations should continue to develop capacity for independent evaluation of programmes, in co-ordination with an improved monitoring system. 	<ul style="list-style-type: none"> COM recommends that in future overview of progress of sectors is prepared for SMSCs. NAC to consider the possibility of preparing "sector sheets" for the purpose of the SMSC meetings. NAC informed about the current stage of preparation for the decentralisation of the Interim Evaluation.

ANNEX 3. Summary of ratings for each IE Report

Monitoring Sector	Report Number	Total Phare allocated (M€)	Overall rating
Public Administration	R/PL/CUS/01029	4.00	S
	R/PL/PAD/01029	4.00	S
	R/PL/PAD/02096	161.60	S
	R/PL/PAD/03029	18.60	S
	R/PL/PAD/03099	54.01	S
Internal Market	R/PL/STD/01028	3.50	S
	R/PL/INT/02094	6.90	S
	R/PL/INT/02101	93.32	S
Transport	R/PL/TRA/02092	66.00	S
	R/PL/TRA/02099	45.00	S
Environment	R/PL/ENV/02001	48.70	S
	R/PL/ENV/02097	57.00	S
Regional Policy	R/PL/REG/02091	16.65	U
	R/PL/REG/03028	321.95	U
Justice and home Affairs	R/PL/JHA/02093	22.00	S
	R/PL/JHA/02100	141.48	S
Agriculture	R/PL/AGR/02095	104.12	U
	R/PL/AGR/03030	10.96	S
	R/PL/AGR/03101	40.55	S
	R/PL/AGR/03102	36.98	U
Cross Border Cooperation	R/PL/CBC/02098	150.00	S
Total		1407.33	