

Annex 4: Action Fiche for the Republic of Moldova - AAP 2011

1. IDENTIFICATION

Title/Number	Support to the Justice Sector Policy Reforms in Moldova (CRIS: ENPI/2011/22680)		
Total cost	EUR10 million EU contribution		
Aid method / Method of implementation	Project approach – direct centralised management		
DAC-code	15130	Sector	Legal and Judicial Development

2. RATIONALE

2.1. Sector context

The proposed programme is consistent with the key sector policy and strategic documents of the Government of the Republic of Moldova (hereinafter Moldova). Moreover, it builds upon the objectives of the EU – Moldova Action Plan and the main lines of the current negotiations of the EU –Moldova Association Agreement.

The set up of the Republic of Moldova justice sector can be summarised under an umbrella of several main sets of problems¹. The main concern at this stage is the general lack of perception by various stakeholders in the justice field of belonging to a larger justice chain, which in turn has resulted in a lack of effective coordination of the sector reforms or a sector-wide strategy. While the Ministry of Justice (MOJ) is formally empowered to coordinate the justice sector reform efforts, it has to observe the constitutional structure of the country, the judiciary being managed independently by the Supreme Council of Magistrates (SCM), the prosecution being governed by the Supreme Council of Prosecutors (SCP), while other significant actors in the justice chain being dispersed throughout the variety of government departments in equivalent status to MOJ - such as the Ministry of Interior (MOI), or Moldova's Anti-Corruption Agency (CCECC) - or managed by private self-regulating corporations (Bar Council, Bailiffs Association). Similarly, donor activities in the justice field are carried out by a variety of international and domestic actors, without a coherent and regular coordination effort.

A second major area of concern is Moldova's criminal justice system, which has been marked by formal attempts to move away from the Soviet type of pre-trial procedures. However, these reforms have led to no substantial increase in efficiency, nor did they result in sufficient independence of criminal investigation and prosecution. The situation is exacerbated by the accusatorial perceptions, the lack of agency cooperation (task-force approach), and the outdated system of performance indicators in law enforcement. In spite of some amendments, the Special Investigative Techniques Act 1994 (SITA) is still formally disassociated from the

¹ See Interim Report of the Justice Sector Assessment (ECO, Brussels, 22 October 2010) p. 3, 'Criminal Justice Performance from a Human Rights Perspective. Assessing the Transformation of the Criminal Justice System in Moldova' (Soros Foundation, Chisinau, 2009); A. Cocirta, Judicial Reform in the Framework of the EU-Moldova Action Plan Implementation (ADEPT, Chisinau, 2009); Opinion of the Council of Europe Commissioner for Human Rights Thomas Hammarberg, concerning independent and effective determination of complaints against the police (OmmDH (2009) 4); CPT Report on the visit to Moldova carried out from 27 to 31 July 2009 (CPT/Inf (2009) 37).

criminal procedure. The so-called ‘operative officers’ do not share responsibility for the outcome of criminal procedures initiated by them, and are not encouraged to cooperate with the investigative and prosecuting authorities. Consequently, the special investigative techniques used in Moldova undermine the criminal justice system by decreasing its efficiency, while also failing to respect the relevant human rights standards of clarity and foreseeability. In order to encourage public confidence in the rule of law and demonstrate seriousness of the intent to combat ill-treatment, the Moldovan authorities have to ensure independent and effective determination of complaints against the police².

Despite various recent reforms in the judiciary, many problems remain, as attested in the cases brought before the European Court of Human Rights³ in relation to excessive length of proceedings, appeals in disguise and the lack of *res judicata*, unlawfulness and length of detention, arbitrary decisions in property matters, and the lack of judicial deterrents in the field of ill-treatment. The continuing corruption in the judiciary - albeit, admittedly, similar to that in other public sectors - may be assumed by reference to Moldova’s ranking at 105th place in the Corruption Perceptions Index 2010 published recently by Transparency International.

With the entry into force of the new Bailiffs Act (15 September 2010) and the new Enforcement Code (7 September 2010), Moldova radically remodelled its system of enforcement of civil court judgments by creating the profession of a private bailiff. More than 200 persons have already obtained a license from MOJ to become private bailiffs. At the same time, less than 50 have already set up offices. The National Union of Bailiffs (NUB) and its management board were elected to regulate and supervise the exercise of the profession. At the same time, a separate Directorate is to be created within MOJ to oversee the process. Therefore, while the new system has already started functioning, it faces a considerable number of problems of structural, theoretical and practical nature, such as a lack of: coherent private corporation or self-regulating capacity; methodology or guidelines on the functioning of a private bailiff; effective and foreseeable regulatory mechanisms and procedural tools with regard to the party’s (debtor’s) assets etc.

Another set of problems relates to the dire state of the probation and rehabilitation systems. A recent reform of the civil enforcement system (see above) also directly affected the Central Probation Office (CPO), which was moved to function under the auspices of the Penitentiary Department of MOJ. However, probation officers are under-paid and lack necessary qualifications, experience or methodology. Moreover, the service is lacking institutional and functional independence. The weakness of the probation and rehabilitation systems is due also to the performance indicators of the prosecutors, encouraging seeking of incarceration rather than the use of alternative measures or the exercise of a mediating role. The general emphasis on punitive measures rather than social work or reintegration of the former prisoners into the society is still prevalent.

² See authorities mentioned in footnote 1 above. Also see the draft Concept of the reform of the Ministry of Interior as submitted to its Government in October 2010; EU-Republic of Moldova Visa Dialogue, “Gap Analysis Report” of the relevant conditions for visa-free travel of Moldovan citizens to the EU as a long-term goal, October 2010; also see inter alia the problems on the relevant issues identified by ECHR in the cases of Iordachi and Others (cited above), Colibaba (23 October 2007), among many other ECHR authorities; Opinion adopted by the European Commission for Democracy through Law (Venice Commission) at its 75th Plenary Session (Venice, 13-14 June 2008); E. Svanidze, Combating Ill-treatment and Impunity and Effective Investigation of Ill-treatment, Country Report on Moldova (Council of Europe, 2010, para. 59); R. Roche, Report on the Reform Concept for the Ministry of Internal Affairs as Submitted to the Government of the Republic of Moldova (Council of Europe, 2010, para. 6.11).

³ See Interim Report of the Justice Sector Assessment (ECO, Brussels, 22 October 2010) and ECHR cases against the Republic of Moldova: *Rosca* (20 October 2009); *Popov* (06 March 2006); *Paladi* (10 March 2009), *Leva* (15 March 2010); *Oferta Plus* (23 May 2007), *Dacia* (14 February 2009); *Corsacov* (04 July 2006); *Holomiov* (07 February 2007).

2.2. Lessons Learnt

The elaboration of this programme is based on the analysis of the needs of the justice sector in the Republic of Moldova⁴ and its readiness for sector-wide reforms. A justice sector assessment was carried on in 2010 by independent experts in close consultations with the Government, the judiciary and the civil society. Therefore, the programme was designed in an unbiased way so that to incorporate local ownership. In addition, the action addresses one of the core problems of the justice sector by strengthening the capacity of a Government-led institution to efficiently steer and coordinate the reform via the development and implementation of a sector-wide strategy and action plan. The Programme itself has a sector-wide approach, providing active support to a variety of actors in the justice chain, including the Government, the judiciary and other corporations.

On the other hand, the action builds on the results of the past and ongoing EU and other donor-funded projects in the Republic of Moldova. For instance, the results-oriented monitoring of two joint Projects with the Council of Europe (COE)⁵ showed that several aspects need to be taken into account in future activities: sustainability of the action in relation to the National Institute of Justice (NIJ) and MOJ, and efficiency of the action via increased involvement in the management of the project of the relevant technical-level stakeholders rather than only the high-level ones. Also, projects lacking focus - namely having too diverse or cross-cutting components - are to be avoided. Under the current action, four projects are envisaged to be contracted.

The experience with UNDP in the "Support to Strengthening the National Preventive Mechanism as per OPCAT Provisions" Project also showed that clear measurable indicators of the results should be defined from the start of the programme.

2.3. Complementary Actions

The programme complements the efforts of the Government for increased efficiency of the justice sector and reforming the judiciary and penitentiary as stated in the National Development Strategy of the Republic of Moldova (2008 – 2011), the Strategy and Plan of Actions on Strengthening the Judiciary (2007-2010), and the Strategy and Action Plan on the Development of the Enforcement System (2007-2011).

The implementation of the current action will be closely coordinated with the implementation of Comprehensive Institution Building Programme (CIB), particularly as concerns the Public Prosecutor's Service Reform.

Some aspects relating to the problem of ill-treatment in Moldova are currently tackled by the Joint EU and COE regional Programme on Combating Ill-treatment and Impunity in Armenia, Azerbaijan, Georgia, Moldova and Ukraine (2009-2011). At present, other international donors, including NORLAM, UNDP, OSCE and U.S. Embassy, have been contributing to a gradual improvement of matters in the investigation and prosecution sub-sector.

Without being a Beneficiary of any specifically dedicated project, Moldova's courts have received various donor contributions in the last few years. Some of the major recent and ongoing donor activities have been given in the context of:

⁴ See Interim Report of the Justice Sector Assessment (ECO, Brussels, 22 October 2010).

⁵ ROM Report Nr. MR-040569.04 of 18.03.2010, Project Increased independence, transparency and efficiency of judiciary in Moldova and ROM Report nr. MR-040572.04 of 26.03.2010, Project against Corruption, money-laundering and terrorism financing

- a) Joint Programme by EU and COE on Increased Independence, Transparency and Efficiency of Judiciary in Moldova (EUR 3.3 million), which, among other things, helped create the National Institute of Justice (ended in 2010);
- b) Joint EU and COE Democracy Support Programme (EUR 4 million) mentioned above - built around the idea of the need to prevent issues attested by the April 2009 events - which started in 2010 and includes certain capacity building segments for judges;
- c) Threshold Country Program (TCP) by the Millennium Challenge Corporation (implemented by USAID, among other U.S. actors), which had the total budget of USD 24.7 million and was carried out from 2007 to 2009, including components on anti-corruption, improvement of the court facilities, and most notably, helping build the Electronic Judicial System;
- d) Trial Monitoring Project (EUR 300,000) carried out by OSCE in cooperation with ODIHR from 2006 to 2009, which produced valuable statistics on the prevalent procedural realities.

UNDP, UNICEF, ABA, NORLAM, SIDA and Soros Foundation, among others, have been carrying out activities with a focus on the capacity building, performance and efficiency of the Moldovan courts. The reform of the system of bailiffs received a contribution from the Joint EU and COE Project on Increased Independence, Transparency and Efficiency of Judiciary (see above). Some support was received by the probation and rehabilitation services from UNICEF, German, Dutch, Norwegian, Swedish and other donors. At the same time, neither the civil nor criminal execution systems have been the object of any larger assistance project. Other notable efforts are currently being undertaken by Soros Foundation in the sphere of legal aid and juvenile justice (together with UNICEF), and German Partners (IRZ) in the context of the twinning activity in Moldova in the penitentiary sector.

The programme reconsiders certain well-targeted conceptual statutory and institutional issues, which have not yet been tackled by donor support. Moreover, in view of the need to optimise the use of resources, the programme leaves untouched those areas which are either being dealt with by strong and targeted efforts of the international and domestic actors (such as the ongoing reform of the legal aid system and support for a stronger Bar Council, juvenile justice, or conditions at penitentiary facilities), or those areas which - at least at this stage - would not permit a clear focus or a sufficient prospect of tangible results in view of the prevalent socio-juridical, political and economic realities (i.e. streamlining of legislative process, lawfulness of detention, or creation of a formalised system of direct application of the European Convention on Human Rights).

2.4. Donor Coordination

There is a lack of efficient donor coordination in the justice field in the Republic of Moldova. The programme will support the implementation of the Government Decision No.12 of 19 January 2010 on the set up of the mechanism of donor coordination and the creation of a Sector Coordination Council for coordinating the external assistance in the area of justice sector reform.

To ensure that the programme does not overlap with other donor activities both ongoing and planned, the identification process was conducted in full consultation with the beneficiary institutions, all the donors and projects mentioned at 2.3 above.

3. DESCRIPTION

3.1. Overall and Specific Objectives

The overall Objective is to accelerate a sustainable justice sector reform in Moldova and to increase the efficiency of the judiciary and other agencies in the justice chain. The specific objectives are:

Component 1 To align major justice sector stakeholders' policies and reform priorities in a coherent sector-wide reform strategy, supported by an implementation plan and a multi-annual financing programme secured by a Government's decision and to create a viable sector coordination structure.

Component 2 To increase the efficiency of the judiciary and other agencies in the justice chain.

3.2 Expected Results and Main Activities

Expected results are:

Component 1:

1. Effective Government-led sector coordination is established and operational. Stakeholder responsibilities and "division of labour" are shared by all and secured in a form of a Memorandum of Understanding that should lay a foundation for the stakeholders' cooperation around the sector policy development.
2. Each sector stakeholder has developed its chapter of the sector strategy in cooperation with other sector's stakeholders and under coordination and guidance of the dedicated entity at the Government of Moldova. The strategy implementation plan with sector-wide and each stakeholder-specific benchmark is created.
3. Sector strategy implementation plan is supported by its implementation mechanism that, in the long run, should be supported by a multi-year financing programme enacted by the Government of Moldova or by a separate law that provides for multi-year budget allocations, depending on the national legislation.
4. The stakeholders possess adequate capacities to implement the sector strategy and are willing and capable to jointly implement the sector reforms. The main institutional weaknesses of each stakeholder are identified and the main needs for technical assistance are addressed.
5. A framework for the sector performance monitoring system is set up (e.g. a sound methodology for collecting statistical data, with a view to measure indicators of progress).

Component 2:

1. Redefined institutional and procedural set-up of the pre-trial stage, resulting in more efficient evidence collection, detection and prosecution of crime, while respecting human rights and fundamental freedoms.

2. Increased independence and specialization of the body for investigation of ill-treatment and other abuses committed by law enforcement officials. New independent and specialised body for the investigation of ill-treatment is set-up.
3. Improved legal framework on the access to and promotion within the profession of a judge. Self-regulating capacity of the judiciary to increase control over quality of performance by the judiciary at an individual and court level is developed. New mechanisms to evaluate the quality of the courts' performance by the society are created.
4. Improved regulatory and practical tools for more efficient court administration and management.
5. Effective, procedural and practical, mechanisms for ensuring greater accountability and transparency of the judiciary, including tools for fighting the judicial corruption are developed.
6. Stronger public relations capacity of the courts.
7. Reformed appeals system, including improved distribution of competence on facts and law between the courts at lower and higher levels, streamlined procedural regulation at all levels of jurisdiction, and an increased role of a hearing at first instance in civil and criminal matters.
8. Enhanced role of National Institute of Justice (NIJ) in initial training and qualification of judges. Wider role of NIJ in continuous training of all legal professionals.
9. Increased capacity of judges, prosecutors, investigators, bailiffs and probation officers to perform their work by applying modern and efficient methodologies.
10. Improved legal framework and procedures for regulation and oversight by the regulatory bodies of the judiciary, bailiffs and probation officers in ethical and disciplinary matters. Enhanced overall capacity of these regulating bodies.
11. Reformed legal framework to facilitate the work of probation officers. The punitive and rehabilitation policies and the relevant statutory basis are reviewed, including the relevant provisions of substantive and procedural criminal law.

The main activities include:

Component 1: Advice and expertise on the creation of a Justice Sector Coordination Body (JSCB) is provided. The European best practices on inter-Ministerial cooperation and information sharing is provided. Activities aimed at making JSCB operational and effective are conducted. Advice on drafting and negotiating of a Memorandum of Understanding is provided. Representatives of each individual stakeholder and JSCB are trained and assisted on developing separate chapters and the general strategy for the reform of the justice sector, the plan and mechanism of implementation supported by financial commitments. Thematic Working Groups (TWG) under JSCB in regard to each larger topic of reform contained in the justice sector strategy will be set up. A framework for the sector performance monitoring system will be set up. Statistical and analytical tools are developed to measure each TWG, stakeholder, and donor contribution to the strategy development and implementation. JSCB, TWG's and stakeholders are provided with supplies to assist these bodies in the implementation of their tasks.

Component 2: Various stakeholders are provided with long and short-term expertise on the relevant international standards and best European practices in the following fields:

- roles of an investigating and prosecuting bodies at the pre-trial stage;
- investigation of minor criminal (administrative) infractions, inter-agency cooperation (task-force approach) in specific cases;
- unified performance indicators and appraisal methodologies in law enforcement;
- providing sufficient safeguards to protect private life, and the rights to a fair trial and defence rights of potential targets of special investigative techniques;
- increasing the interoperability between the legal frameworks on special investigative techniques and criminal procedure;
- independent and effective investigation of law enforcement abuse, including the comparative experience in institutional design, and means used to increase the civil society participation and encourage collaboration of witnesses in reporting police abuse;
- qualification and promotion of judges, including performance indicators and procedures for filling vacant posts;
- courts' quality control policy and its implementation, including systems of surveys of 'user-evaluation' of the administration of justice;
- role of a unified centre for continuous training of all legal professionals, its curricula and methodologies, choice of trainers and training needs assessment;
- business processes needed to manage e-justice systems, the use of various automatic tools for greater efficiency and transparency of case management and hearings;
- budget formation and facilities management (procurement) of courts;
- ethical and disciplinary breaches by judges, bailiffs, probation officers, their consequences, procedures to be followed in examining them, and special bodies to be created for investigation purposes;
- more efficient ways of ensuring self-regulating capacity of courts and bailiffs, and regulation of probation services;
- prevention of judicial corruption by civil, administrative and criminal tools, including the questions relating to immunities;
- courts' obligation to inform the public and the media about their activities;
- distribution of competence on facts and law between the courts at lower and higher levels, for a more streamlined procedural regulation in civil and criminal appeals at all levels of jurisdiction;
- increased role of a hearing at first instance in civil and criminal matters;
- regulatory regimes, licensing, functioning and oversight of the profession of a private bailiff;
- more efficient tools of dealing with debtor assets to ensure enforcement;

- probation, rehabilitation and reintegration policies and their implementation.

Various stakeholders are provided with advice and assistance on drafting reports, guidelines and methodologies, organisational and managerial tasks, with the result that institutional and regulatory amendments are formulated in the areas mentioned above. Study-visits to examine the most appropriate regulatory regimes are carried out. The new proposed regulatory framework is adopted and followed by in-depth trainings of representatives of the stakeholders. Various awareness raising and PR activities, including the involvement by the civil society to conduct 'user satisfaction' surveys of the justice system, are carried out. Procurement and supply activities are provided particularly to assist with: infrastructure and office equipment for the newly created law-enforcement ill-treatment investigation body; the bailiffs self-regulating body; conditional infrastructure investment in NIJ, provided it accepts an enlarged role in continuous training of all legal professions, including private lawyers and bailiffs; IT equipment, video conferencing, other communication equipment, and analytical software and tools for law-enforcement, judiciary, bailiffs and probation officers. Feasibility studies of further possible investments and support initiatives are provided in various aspects of possible improvement of the penitentiary and rehabilitation systems.

3.3 Risks and assumptions

The main underlying assumption is that Moldova remains on a path of manifest and real commitment to reform its justice sector, following the upcoming elections and formation of new governing forces in early 2011. This assumption may be mitigated by the essential political neutrality of the proposals in this Programme. Awareness of the Moldovan authorities of the need to create such a framework - together with developing the justice sector reform strategy - in order to receive EU budget support, may serve as a certain mitigating factor in favour of such an assumption. Another action-specific risk relates to a variety of views of the major stakeholders on the possible models and solutions to the problems in issue. However, it may be mitigated by the unanimous acknowledgment of the need to address them. For any future support, there is also the necessity to carry out a thorough assessment of institutional capacity before embarking on more substantial support to the concerned institutions.

3.4 Crosscutting Issues

The programme will address a number of cross-cutting issues, including good governance and human rights, the need to tackle corruption, the rights of the juveniles and detained persons. At the same time, the programme will address the right of access to court, and to a fair and speedy trial. Improving the capacity of the Judiciary and the Ministry of Justice will ultimately ensure that the interests of the citizens are satisfied in an effective, qualitative, and timely manner.

3.5 Stakeholders

The programme suggests interventions in line with the two components revealed at the identification stage. It foresees the following primary beneficiaries/stakeholders: the Justice Sector Coordination Body (JSCB), Ministry of Justice (MOJ) and its relevant (penitentiary and probation) departments, Supreme Council of Magistrates (SCM), Supreme Court, Supreme Council of Prosecutors (SCP), Office of the Prosecutor General (PGO), Bar Council, Ministry of Interior (MOI) and its relevant (investigation and operative) departments, CCECC, Bailiffs Association, Constitutional Court, Parliament, Ministry of Finance, Centre for Legal Approximation (CLA), Government Chancellery Donor Coordination Unit (DCU). The Programme also allows room open for involvement of other primary beneficiaries, where

appropriate. The secondary (impact) beneficiaries are all members of legal professions in Moldova, representatives of the civil society and the media, detainees and vulnerable categories of persons.

All the beneficiaries, including NGOs and the civil society, have been consulted during the formulation phase, having shown an explicit commitment towards the objectives of the programme.

4. IMPLEMENTATION ISSUES

4.1. Method of implementation

The implementation method will be direct centralised management, through the signature of service and supply contracts and/or grant agreements.

4.2. Procurement and grant award procedures

1) Contracts

All contracts implementing the action will be awarded and implemented in accordance with the procedures and standard documents laid down and published by the Commission for the implementation of external operations, in force at the time of the launch of the procedure.

Participation in the award of contracts for the present action shall be open to all natural and legal persons covered by Financial Regulation applicable to general budget. Further extensions of this participation to other natural or legal persons by the concerned authorising officer shall be subject to the conditions provided for in Article 21(7) of the ENPI Regulation.

2) Specific rules for grants

The essential selection and award criteria for the award of grants are laid down in the Practical Guide to contract procedures for EU external actions. They are established in accordance with the principles set out in Title VI 'Grants' of the Financial Regulation applicable to the general budget. When derogations to these principles are applied, they shall be justified, in particular in the following cases:

- Financing in full (derogation to the principle of co-financing): the maximum possible rate of co-financing for grants is 80%. Full financing may only be applied in the cases provided for in Article 253 of the Commission Regulation (EC, Euratom) No 2342/2002 of 23 December 2002 laying down detailed rules for the implementation of the Financial Regulation applicable to the general budget of the European Communities.
- Derogation to the principle of non-retroactivity: a grant may be awarded for an action which has already begun only if the applicant can demonstrate the need to start the action before the grant is awarded, in accordance with Article 112 of the Financial Regulation applicable to the general budget.

4.3. Budget and calendar

Estimated breakdown of the overall amount by the main components and the calendar

Components of the action	Indicative EU Budget in EUR	Duration
Component I	2,800,000	
Creation of the Sector Coordination Body and Development of the Strategy on the Justice Sector Reform	Services 90% Supply 10%	36 months
Component II		
Increased Efficiency of the Justice System		
1. Support to the Pre-trial Investigative Set-up in Moldova	2,000,000 Services 75 % Supply 25%	36 months
2. Increased Efficiency, Accountability and Transparency of Courts in Moldova	3,000,000 Services 60% Supply 40%	36 months
3. Support to the Enforcement, Probation and Rehabilitation Systems in Moldova	2,000,000 Services 75% Supply 25%	36 months
Audit and Evaluation, Contingencies.	200,000	
Total Budget in Euros	10,000,000	

The foreseen operational duration is 36 months from the signature of the contracts.

4.4. Performance monitoring

All the results of the project will be measured against the findings/deficiencies identified by the assessment of justice sector mentioned at 2.2 above. The programme's overall objectively verifiable indicators (OVI) are: (i) operational, efficient and sustainable Government-led coordination JSCB, plus officially approved strategy and action plan on the reform of the justice sector; and (ii) setting up (or improvement) of an objective and efficient system of measurement of the efficiency of the judiciary, and increased efficiency of the judiciary and other agencies of the justice chain.

The programme will ensure that the activities to be undertaken for the achievement of the project results and the benchmarks will be updated by the implementer in consultation with the beneficiary and approved by the EU Delegation before the start of implementation. This requirement shall form part of the contracts for awarding the action.

The monitoring of the day-to-day implementation will be carried out by the European Commission under its standard procedures. It includes periodic assessment of progress and delivery of the specified project results towards the achievement of project objectives.

4.5. Evaluation and audit

Mid-term and final evaluation of the programme implementation will be commissioned by the European Commission to assess the project performance, achievements and impact. A provision is set aside for this purpose within the allocated budget.

4.6. Communication and visibility

Proper communication and visibility of the programme will be achieved via widespread dissemination of the project achievements and results (to be developed by the implementers following the EU visibility guidelines, and annexed to the Description of the Action). Additional visibility will be achieved through public events (project's opening, annual and closing conferences) and updates published on the EU Delegation's website. A reasonable communication budget will be set aside for promotion of the action in the implementing projects.