

Annex 2: Action Fiche for Georgia AAP 2011

1. Identification

Title/Number	Support to conflict affected/displaced population and host communities (CRIS: ENPI/2011/22671)		
Total cost	EUR 19 million		
Aid method / Method of implementation	Sector Policy Support Programme: - Budget support (centralised management): EUR 10 million - Project mode (centralised /joint management): EUR 9 million		
DAC-code	73010	Sector	Reconstruction, relief and rehabilitation

2. Rationale and country context

2.1. Country context and rationale for SPSP

2.1.1. Economic and social situation and poverty analysis

Georgia, a small developing economy of 4.6 million people and a gross national income (GNI) per capita of USD 2560 has undertaken deep economic, social and governance reforms over the past seven years. These include impressive progress in reforming the role of the state, dramatically reducing corruption, and strengthening the business environment. Sound fiscal and monetary policies supported by structural reforms have positively impacted economic growth in larger Georgian cities, e.g. Batumi and Tbilisi. Despite sharp decreases in foreign investments after the 2008 conflict, the economy is recovering. Projections for GDP growth are about 6.5% in 2010 and 4.5% in 2011. Current account deficit remains high at 12.7% of GDP which with fast growing foreign public debt may challenge fiscal stability in the medium term.

Poverty and unemployment remains high at 27.8% and 16.7% following the August 2008 conflict and global financial crises. Rural poverty is almost twice that in urban areas. Agricultural production remains low, outdated and largely subsistence accounting for 11% of GDP but employing almost 60% of the population. Consequently 40% of the population's consumer expenditure - is below the official minimum subsistence level with average consumption of the poor 14% lower than the subsistence level. 60% of the poor live in rural areas.

2.1.2. National development policy

Reducing Georgia's regional disparities is a key objective of the Government in its "Georgia without Poverty" and Basic Directions and Data (BDD) programmes. The BDD outlines the medium term reform program, its objectives, medium-term macroeconomic forecast, fiscal resources and allocations, and descriptions of line ministry strategies. The latest draft BDD2011-14 stressing the link between growth and poverty reduction was submitted to Parliament in November 2010.

2.2. Sector context: policies and challenges

Georgia's declaration of independence in 1991 following the Soviet Union's breakup was followed by internal and external armed conflicts and significant economic decline and corruption. 256,400 IDPs¹ from Georgia's breakaway regions of Abkhazia and South Ossetia occupied Government and private buildings or were sheltered by friends and relatives, mainly in urban areas such as Zugdidi and Tbilisi. In 2007 a change in Government policy saw moves to re-integrate IDPs into mainstream Georgian society and the first IDP Action Plan (AP) was developed. The Brussels donor conference prioritized Durable Housing Solutions (DHS) and Georgia, with international support accelerated the development and operationalization of a new AP which is revised annually. The latest revision is scheduled for May 2011.

2009 saw New Caseload (NCL) IDP expediently provided with housing contrasting with the lack of past action to mitigate the plight of the Old Case Load (OCL), who mainly continued to live in dire conditions. 2010 focussed on addressing the worst of the OCL IDP housing by rehabilitating apartments and buildings or building new accommodation. Significant progress in these and socio economic integration sectors has been achieved with EU funding under the three previous financing agreements supporting the implementation of the AP. According to the Government of Georgia², most of the 7,900 NCL and 16,000 OCL IDP have received some sort of DHS, while it is estimated that 7,500 OCL IDP are not in need of DHS. There remain 16,000 families living in Collective Centres (CCs) and 39,000 more living in private accommodation.

A challenge recognised under IDP III was to channel the support to IDP livelihoods. The Ministry of Refugees and Accommodations (MRA), understood livelihoods but lacked the capacity to address the issues. The Ministry of Regional Development and Infrastructures (MRDI) was selected as the next most appropriate Ministry. However, with an emphasis firmly set on macro infrastructure development the MRDI has been unable (and unwilling) to address the IDP livelihood problem directly. Meanwhile, through the EU funded Technical Cooperation programme the MRA's capacity has increased significantly. It now understands fully the IDP livelihood situation and, with support, is able to manage and operate a livelihood support mechanism for IDPs and host communities. Under Georgian legislation this type of initiative in a Ministry requires a Legal Entity under Public Law (LEPL).

(1) Main findings of the assessment of the sector budget and its medium term financial perspectives

The MRA 2011 State budget allocation is 30,315,40 GEL, a decrease of 10 million from 2010 reflecting the process where, following privatization of collective centres the MRA is no longer obliged to pay utility bills and stipends – that responsibility falling to the MLHSA³. Should collective centres not be privatized at the planned rate the MRA could potentially face a deficit requiring addressing in the Governmental mid term financial review.

(2) Description of the coordination process with the beneficiary country and/or other donors, notably Member States, having in mind the Paris Declaration, the European Consensus on Development and EU Code of Conduct

The programme coordinates with the Government in accordance with the Paris declaration⁴, the European Consensus and Code of conduct: all actions are designed to follow Municipal, Regional and National development strategies including the MRA housing strategy and the IDP AP. All aspects of the programme have been discussed in detail with different Ministries and incorporate their priorities.

(3) Assessment of institutional capacity

¹ According to the GoG's "Housing Strategy and Working Plan", updated in December 2010. IDPs from the early 1990s are classified as Old Case Load (OCL). IDPs from 2008 are termed New Case Load (NCL) IDPs.

² "Housing Strategy and Working Plan", updated in December 2010.

³ Ministry of Labour, Health and Social Affairs

⁴ On 13 December 2010 the GoG officially announced its intention to sign the Paris declaration.

The MRA is undergoing a major TC programme funded by the EU and SIDA implemented by the Danish Refugees Council. This TC plus an existing World Bank-funded LEPL within the MRA means that the Ministry now possesses capacity to lead and administer future EU Livelihood funding. This programme proposes to channel those funds through the existing LEPL (set up by the WB) after it goes through comprehensive reforms to make it compatible with EU procedures and operational standards. The programme proposes to grant the livelihood component to a reformed LEPL that will be managed by a supervisory board consisting of EU, WB, MRA, MRDI and international experts. Relevant expertise to ensure proper set up and management of this component will be ensured through TC. The LEPL will coordinate, fund and evaluate initiatives in support of livelihood development implemented by State and non-State actors, in line with the IDP AP.

A contingency plan in the event of the above not being possible is for a new LEPL to be created within the MRA. However, legalisation and operationalisation of the new entity could take time. In addition it makes more sense to enhance existing capacities (provided that they can operate according to EU standards) than to create new ones, that could eventually bring about useless duplications.

The creation of this LEPL has come up -after discussions with MRA, MRDI, donors and implementing partners- as the best possible solution, given the facts that:

a) The MRDI focusing on major infrastructural development does not possess the capacity or strategy to implement 'grass roots' livelihoods programmes;

b) The MDF has good technical capacities in the construction sector but implementation of livelihood projects is beyond its core competencies;

c) The MRA has now the necessary expertise and sensitivity to implement these activities, however a Ministry is not allowed to accept this type of funding unless it is within the scope of a legal entity set up within its structure;

d) The channelling of funds through a LEPL will reduce risks, from the donor perspective, as the legal agreement provides the scopes within which it must operate and the tasks it addresses. This means that the department cannot be 'requested' to do something with its funding outside its ToRs and therefore can (must) concentrate on its task (therefore, not subject to changing directions/interests of senior Government staff). As stated before the EU Delegation will be represented in the supervisory board (or steering committee) that will give its consent to the general directions of the LEPL activities.

(4) Overall framework for performance monitoring for the implementation of sector policies and strategies; coherence with the overall government sector programme performance assessment framework; process of performance monitoring; means of verification; steps to strengthen performance measurement

The overall framework for performance monitoring for the implementation of sector policies and strategies is conducted by line ministries/institutions in coordination with the MoF; level of development is unequal depending on sectors.

(5) Public Financial Management and Macroeconomic framework

The government of Georgia is prioritising a gradual reduction of fiscal deficit and rebuilding investors' confidence. Tax revenues will increase by 15% assuming continuing economic recovery and enhancement of administrative tax measures.

Expenditure priorities remain the same. Large infrastructure projects remain the government priority in 2011. There is no major increase in financing different sectors. However, a slight budget increase for the Ministry of Agriculture is an indication that the government will focus more on agriculture development. (See Annex 1 for an analysis of the State Budget 2011).

2.3. Eligibility for budget support

Georgia is performing well in implementing structural reforms, managing to maintain macroeconomic stability and settle problems arising from the August 2008 conflict and the World Financial Crises. In 2009 the government reaffirmed its commitments to PFM reforms and set ambitious budgeting goals, evidenced by the approval of legislative documents modernising Public Finances. For four years Georgia has ranked high in the World Bank "Easy Doing Business" ratings. Transparency International Reports show corruption levels significantly decreasing since 2003. Georgia's position in "Open Budget Index" has markedly improved from 33% in 2006 to 55% in 2010.

The programme with the IMF and investment projects with IFIs (WB, ADB, EBRD, IFC, etc) is an indication that Georgia is a credible partner and can maintain a level of macroeconomic and fiscal stability and transparency.

2.4. Lessons learnt

54% of Georgians live below the poverty line and assistance to IDPs must address poverty of host communities in line with the Government's 'Georgia Without Poverty 2008 – 2012' programme, the State Strategy for IDPs and Action Plan and other complimentary programmes. Failure to do this risks creating inter community resentment and conflict.

Evidence shows housing alone is not a durable housing solution (DHS). Ownership of housing is culturally valued in Georgia and engenders a feeling of settlement. However, a psychological and physical need to be self supporting and provide for one's family is equally if not more important.

Experience from the IDP-3 programme has shown certain limits with regards to MRDI's (including the MDF) capacity to implement projects related to livelihood/socio-economic integration of IDPs.

Regular monitoring of the targeted BS programmes "Support to Georgia IDPs Action Plan: Part II" was undertaken by an independent monitoring body. Monthly reports were submitted on the implementation of the programme by the Government. 2 Review Mission Reports and 5 monthly Reports have been submitted. Similar monitoring has been carried out covering the IFS projects⁵.

2.5. Complementary actions

The current programme is a continuation and expansion of the activities undertaken under the three targeted budget support programmes funded by the EU from 2008 to 2010 ("Support to Georgia IDPs Action Plan: Parts I, II and III"). Implementation of the latter ("IDP-3") will last until 2013, hence overlapping with IDP-4. The objectives, indicators and conditions set up in the policy matrix (as part of the TAPs annexed to the Financing Decision) will complement and build on results expected under IDP-III.

- Two TA projects are envisaged under IDP-3 (one of them already contracted, the second contract expected early 2011):
 - (i) DHS Framework: supporting the MRA in the provision of DHS to IDP (development of a manual for DHS, selection of beneficiaries, supervision of construction and relocation of IDPs).
 - (ii) TA for Local and Regional Development in IDP populated regions: supporting PSD and infrastructure enhancement in line with the national regional development strategy.
- The TA "Capacity Development programme for the MRA" under the IDP-II BS programme is ongoing. This is instrumental for setting up processes, structures and capacities enabling the MRA to implement effectively the IDP AP, coordinate and manage donors' assistance.

⁵ The final report is due in March. It will be available in CRIS.

- "Economic Development for IDPs in Georgia" (DCI-HUM/2010/236-744) selected under the Investing in People 129-202 CfP contributes to poverty reduction and youth inclusion in IDP livelihood development, particularly through increasing agricultural productivity, inclusion of IDP farmers in the formal work sector and attracting youth to rural development activities. Synergies and links with the agricultural component of this SPSP will be sought.

A number of other EU-funded interventions directly or indirectly address IDP-issues in Georgia:

- Instrument for Stability (IfS) – EUR 36.850.000 has been committed by the EU through IfS to support Georgia to overcome the consequences of the 2008 conflict. EUR 14 million is allocated to supporting socio-economic integration of IDPs. Projects –mostly ongoing and implemented by local and international NGOs, cover a range of successful activities. This programme will incorporate and expand lessons learnt from them.
- In 2010 the EU contributed EUR 3 million to the Trust Fund for Emergency Rehabilitation and Construction (ENPI/2010/242716), administered by the World Bank Group. This project assists Georgia in restoring infrastructure and services and improves housing conditions for conflict affected people in "new IDP" settlements.

Multiple actors are active in this field. Most relevant are:

- USAID: ongoing USD 42 million programme aimed at IDP housing rehabilitation. Will be supplemented by an undecided sum for 2011. Preliminary meetings with USAID have shown that the sum provided for rehabilitation will decrease significantly. Emphasis will be on livelihoods and other socio-economic integration programmes.
- KfW has a budget allocation of approximately EUR 7 million currently targeted at re/construction. Exact allocation of those funds will be decided in January 2011.

2.6. Donor coordination

Coordination with EU Member States is led by the EU Delegation which hosts regular EU heads of mission meetings where, among other topics, IDP issues are regularly discussed.

Senior donor organisations and Government representatives⁶ coordinate closely in the MRA led IDP Steering Committee (SC) - a regular and formal high level mechanism of strategic coordination and joint planning/decision making. The SC is informed by Temporary Expert Groups (TEGs) comprising field based NGOs, Civil Society Organisations and independent experts. TEGs are given time bound tasks to provide answers and recommendations to the SCs questions. The composition and scope of work of the SC will be appropriately revised to reflect the needs and objectives of the EU programme.

The MRA conducts ad-hoc information conferences to donors/stakeholders (the last being December 6 2010 following the request of the EU Delegation). This practice will be encouraged and promoted (at least 2 information conferences per year).

Discussions are ongoing on the need to institutionalise an IDP donor-coordination mechanism. However, given the multiplicity of current coordination settings there is a risk of "*coordination fatigue*". This issue will be discussed with GoG and stakeholders prior to programme start.

⁶ The following institutions are permanent members of the Steering Committee: MRA, Ministry of Labour, Health and Social Affairs (MoLHSA), Ministry of Justice (MoJ), Ministry of Finance (MoF), MRDI, Ministry of Agriculture (MoA), MDF, EU, SDC, UNHCR, UNCT, USAid, World Bank, one international NGO and one local NGO.

Mechanisms to reinforce MRA-other ministries coordination and exchange of information will be investigated (coordination appears in the draft policy matrix as a condition for disbursement). However, as sole implementer of the BS programme final responsibility will lie with the GoG.

The enhancement of the WB-funded LEPL will reinforce donor coordination in one of the most important programmatic areas in the IDP AP.

The GoG has taken up a donor-agreed DHS ‘Road Map’ (attached as Annex 2) that provides a clear strategy for providing DHS and socio-economic integration of IDPs currently residing in collective centres scheduled for closure and will enable donors to align their funding strategies in an efficient, targeted and coordinated manner.

3. Description

3.1. General Objective

This programme aims to provide Durable Housing Solutions to IDPs and raise both them and their host communities out of extreme poverty and lessen their dependence on the State.

Specific Objective

The specific objective is to re/integrate IDPs into their host communities by providing rehabilitated or newly constructed housing to IDPs and opportunities for both communities to work and develop together to raise themselves out of poverty through sustainable livelihoods and societal development programmes.

3.2. Expected results and main activities

The **expected results** of the programme are:

- Improved GoG data collection/analysis systems, completed and accurate base line surveys;
- Operational system of transferring IDPs from status to needs based classification;
- Developed and operational GoG managed IDP privatization system;
- Rehabilitation/new construction of apartments;
- Closure of structurally dangerous collective centres and/or collective centres that need to be emptied for other reasons and IDPs re-housed;
- MRA LEPL administering livelihoods funds effectively and efficiently;
- IDPs and host community receive relevant livelihoods and psycho-social assistance;
- MRA increasingly efficient, effective and relevant to IDPs and host communities;

The expected results listed above will be achieved through five **main activities**:

1. Provision of DHS to IDPs via the construction/rehabilitation of apartments and/or houses through the MDF, MRA or other Government body;
2. Provision of livelihoods and Private Sector Development support;
3. Provision of Community Development Programmes;

4. Provision of agricultural support;
5. Provision of Technical Assistance in support of the above.

3.3. Risks and assumptions

Risks

- The potential for a change in the MRA Minister is a continual threat to stability. Changes in the leadership could harm the continuity in the implementation of the IDP AP;
- A return to armed conflict is a critical risk to the programme;
- Widespread political instability within Georgia is unlikely but could be a critical risk;
- High staff turnover in Ministries is a medium risk to programme effectiveness and one which is being addressed with some success by the TA programme operating in the MRA;
- Despite the fact that approval has already been granted at Ministerial level and due to internal political forces the GoG might fail to reform the existing LEPL see paragraph 2.2.(3) above). In that case a new MRA LEPL could be created.
- The possibility of channelling the funds through the MRA LEPL might be dismissed by the GoG in future negotiations.
- As in all programmes the risk of corruption is present. Georgia currently ranks 68th out of the 178 countries in the 2010 Transparency International Corruption Perceptions index. The Global Corruption Barometer (9th December 2010) found that Georgia had the highest number of respondents who considered their Government to be effective at combating corruption. Close coordination and collaboration combined with efficient independent monitoring and a commitment to transparency and accountability will mitigate corruption possibilities.
- In the framework of the ongoing decentralisation process, the GoG has envisaged to relocate some of the line ministries outside Tbilisi; more concretely the MRA is likely to be moved to Gori. This move will not make the regular and fluent EU Delegation-MRA dialogue easier.

Assumptions

This programme is based upon the assumptions that:

- The Government remains committed to the process of supporting the re/integration of IDPs and the necessary structures (MRA) are kept in place;
- The political situation within Georgia retains its current level of stability;
- The close coordination between donors and stakeholders in the DHS process remains strong;
- The Government keeps to the terms agreed in the programming document (FA, TAPs).

Rumours on changes at the highest level within the MRA are recurrent. Current programmes serve to minimise risks: the EU funded Technical Cooperation programme is institutionalising new HR systems which will minimise high staff turnover thus militate against disruption caused by changes of leadership. The Minister has lectured his staff on their responsibilities to continue working effectively following Ministerial changes. A policy of zero tolerance of corruption and nepotism will ensure immediate action should instances arise. Organisations such as Transparency International and GYLA permanently monitor the Government's actions.

3.4. Stakeholders

The MRA, IDPs, host communities and Municipal level authorities directly benefit from the programme and will work in close collaboration. They will enable participation at all levels of society in the decision making process including marginalized groups such as disabled.

The Technical Assistance component (EUR 2 million) will increase efficiencies at the MRA and local authorities and support the formulation, operationalisation and management of an efficient livelihood component within the MRA LEPL and enhance privatization and status transfer systems. To ensure synergy and complementarity between the MRDI and MRA the MRA led supervisory board designed to oversee LEPL livelihood activities will include MRDI representatives.

Programme activities will be coordinated in close coordination with:

- Other donors active in the field of IDP support (USAid, UNHCR, UNDP, SIDA, etc);
- Private sector associations and businesses, Chambers of Commerce;
- Central Government: MRA, MRDI;
- Regional and Municipal development strategies;
- Civil Society – national NGOs, IDP and host community representative bodies;
- International NGOs and Organizations.

3.5. Crosscutting Issues

Good Governance and Human Rights: The programme will promote the principles of transparency and accountability in Government, providing opportunities in an equitable and efficient manner in line with international and national IDP law and conventions.

Gender Balance: The programme will require women to be meaningfully involved in any decision making process. Opportunities provided under the programme will be open to male and female. Compliance reviews will entail an assessment of gender equalities.

Environment: Construction and rehabilitation will comply with GoG Rehabilitation standards which provide instructions on environmental safety and the use of hazardous materials. Trainings, PSD opportunities and agriculture programmes will prioritize environmental sustainability in any initiative.

Equality of Opportunity: Aside from housing rehabilitation, all elements of the programme will be open to both IDP and host communities providing equal access to programme opportunities.

4. Implementation issues

4.1. Method of implementation

- *Direct* centralised management – untargeted budget support and project approach.

Part of the funds will be allocated (tentatively EUR 10 million) through budget support and the remaining EUR 9 million will be committed following a project approach (see paragraph 4.3 for the estimated breakdown).

Tentatively EUR 5 million out of the EUR 9 million to be implemented through a project approach will be assigned to the MRA LEPL in the form of a directly awarded grant, in virtue of section 6.3.2 of

the PRAG, (specifically "for actions with specific characteristics that require a particular type of body on account of its technical competence, its high degree of specialization [...]).

This grant will be fully financed by the EU, as foreseen in article 253.1.d of the implementing rules of the Financial Regulations ("actions resulting from the implementation of financing agreements with third countries [...]). Financing in full of this component is in deed necessary in order to be able to achieve the expected results:

- i) it is essential to ensure that the LEPL is fully operational, has undergone the required reforms, has adequate human and material resources, and
- ii) shall co-funding be requested from the Georgian Government this might lead to lengthy delays or even the dismissal of the proposal.

It should be noted that other donors might contribute by bringing additional funds to the LEPL once it is up and running for supporting complementary actions (eg. as mentioned in paragraph 2.5 above, USAid is expecting to allocate a still undetermined amount of funds to projects in promotion of livelihoods/socio economic integration).

- *Joint management* through the signature of an agreement with an international organisation.

A grant or joint management agreement will be signed with FAO for the implementation of the agriculture-related component.

Should the preferred MRA LEPL option or its contingency plan not materialise, the signature with an IO might be envisaged for the implementation of some components.

4.2. Procurement and grant award procedures

1) Contracts

All contracts implementing the action must 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 in question.

Participation in the award of contracts for the present action shall be open to all natural and legal persons covered by the ENPI. 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. 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. However in the case a grant is provided to the LEPL for the IDP livelihood component 100% financing is envisaged.

3) Joint management

In the case an agreement with an IO will take place all contracts implementing the action will be awarded and implemented in accordance with the procedures and standard documents laid down and published by the International Organisation concerned.

4.3. Budget and calendar

The programme will have two major components, with the following **estimated** financial distribution:

1) **Budget Support** – EUR 10 million allocated to provide DHS to conflict affected/displaced population and improve the living conditions of conflict affected/displaced population and the host communities.

This amount will **possibly**⁷ be allotted in 3 individual tranches, dependent on compliance with the general and specific conditions set up in the TAPs. Variable tranches will be disbursed on a 30-70% basis (30% on compliance with the general conditions and 70% on compliance with the specific sector-wide conditions).

The **indicative** calendar for disbursement is the following:

- Signature of Financing Agreement – 3rd^d quarter 2011
- Disbursement of first tranche (EUR 3 million) – 1st quarter 2012
- Disbursement of second tranche (EUR 3 million) – 1st quarter 2013
- Disbursement of third (variable) tranche (EUR 4 million) – 1st quarter 2014

Tranche Type	Year 1 (2011) (in EUR million)				Year 2 (2012) (in EUR million)				Year 3 (2013) (in EUR million)				Year 4 (2013) (in EUR million)				Total(in EUR million)
	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	
Fixed Tranches					3												3
Variable tranches									3				4				7
Area 1									1				1.5				
Area 2									1				1.5				
Area 3									1				1				
Total					3				3				4				10

2) **Project Approach** – EUR 9 million, which will cover the following sub-components:

- a) EUR 5 million grant to the reformed/established LEPL under the MRA [see paragraph 2.2 (3)] for the implementation of Livelihood/PSD projects. Shall the LEPL option prove unfeasible these funds will be channelled using one of the alternatives mentioned in paragraph 4.1 above.
- b) EUR 2 million grant or joint management agreement with an IO for the implementation of agricultural support projects (probably FAO).

⁷ Subject to further discussions both within EU services and with the Government of Georgia.

- c) Technical Assistance – EUR 2 million. TA projects are likely to be launched within 6 months from signature of the Financing Agreement (depending on negotiations with the government). Evaluation and external monitoring will be carried out under this component.

The estimated operational duration of the programme will be 36 months as from the date of signature of the Financing Agreement by the second party.

4.4. Performance monitoring and criteria for disbursement

There are no EuropeAid Standard Indicators defined for this sub-sector.

The General and Specific Conditions for disbursement of each of the individual tranches will be defined in detail in the policy matrix attached to the Financing Agreement⁸. Disbursements linked to the budget support component of the SPSP will be released only after positive assessment by an external and independent review carried out to assess the level of compliance with the general and specific conditions set up in the TAPs annexed to the FA. External independent monitoring for the implementation of the action will be sought.

4.5. Evaluation and audit

Audits, evaluations and monitoring will be carried out by the Commission.

Additional evaluations, verifications and/or audits of the TA projects under this programme can be requested by the EU at any time.

4.6. Communication and visibility

Communication should focus on the achievements and impact of the action. In order to maximise the impact of communication efforts, both the government and the implementers of the different projects under this programme should produce a communication and visibility plan in accordance with the EU Communication and Visibility guidelines (http://ec.europa.eu/europeaid/work/visibility/documents/communication_and_visibility_manual_en.pdf) within six months after the signature of the Financing Agreement. The communication plan will have to be agreed with the EU Delegation staff responsible for communication activities and the programme manager.

⁸ Still under negotiation with the GoG. The final version will be incorporated in the TAPs and annexed to the FA.