



Evaluation of the Twinning instrument in the period 2010-2017

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The opinions expressed in this document represent the authors' points of view
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LIST OF ACRONYMS

AA	Association Agreement
AO	Administrative Office
CA	Contracting Authority
CC	Candidate country
CFCE	Central Finance and Contracting Entity
CfP	Call for proposals
CoTE	Centre of Thematic Expertise
DCFTA	Deep and Comprehensive Free Trade Area
DG NEAR	Directorate-General for Neighbourhood and Enlargement Negotiations
DG REGIO	Directorate-General for Regional and Urban Policy
EC	European Commission
EGC	Economic Governance and Competitiveness
EEAS	European External Action Service
ENI	European Neighbourhood Instrument
ENP	European Neighbourhood Policy
ENPI	European Neighbourhood Partnership Instrument
EQ	Evaluation Question
ERDF	European Regional Development Fund
ESIF	European Structural and Investment Funds
EU	European Union
EUD	European Union Delegation
FA	Financing Agreement
FTA	Free trade area
FPI	Foreign Policy Instrument
FR	Financial Regulation
HRM	Human resources management
INTOSAI	International Organisation of Supreme Audit Institutions
IPA	Instrument for Pre-accession Assistance
IR	Implementing Rules
ISG	Inter-service Steering Group
ISSAI	International Standards of Supreme Audit Institutions
JC	Judgement criterion
JE	Junior Expert
MFF	Multiannual Financial Framework
MIPD	Multiannual Indicative Programming Document
MS	Member State
NCP	National contact point
NGO	Non-governmental Organisation
NHRI	National Human Rights Institution
OECD	Organisation for Economic Cooperation and Development
PAO	Programme Administration Office
PAR	Public administration reform
PCA	Partnership and Cooperation Agreement
PCC	Potential candidate country
PC	Partner country
PEFA	Public Expenditure and Financial Accountability
PFM	Public finance management
PL	Project leader
ROL	Rule of law
ROM	Results oriented monitoring

RTA	Resident Twinning Adviser
SAA	Stabilisation and Association Agreement
SAI	Supreme Audit Institution
SGUA	DG NEAR Support Group for Ukraine
SE	Senior Expert
SIGMA	Support to Improvement in Governance and Management
SPS	Sanitary and phytosanitary
SRSS	Structural Reform Support Service
STEs	Short-Term Experts
TADAT	Tax Administration Diagnostic Assessment Tool
TAIEX	Technical Assistance and Information Exchange
TBT	Technical barriers to trade
TCT	Trwinning Community Tool
TFR	Trwinning Final Report
TPF	Trwinning Project Fiche
TL	Team Leader
TM	Trwinning manual
TORs	Terms of Reference
TRM	Trwinning Review Mission
WTO	World Trade Organisation

1 EXECUTIVE SUMMARY

1.1 Objective and scope of the evaluation

The purpose of the evaluation is to provide an overall independent assessment of Twinning in the period 2010-2017. The findings, conclusions and recommendations of the report are intended to inform the debate on the future of Twinning as a delivery mechanism to support enlargement and neighbourhood countries in meeting their respective commitments in the framework of their relationships with the European Union (EU).

In accordance with the ToRs, the evaluation covered the period 2010-2017, and all EU Member States (MSs) and the 20 partner countries (PCs) that have benefited from at least one Twinning project over the period.

Carried out from February 2018 to February 2019, the evaluation was organised around five evaluation questions (EQs), namely two transversal questions reviewing the conditions for Twinning implementation over time and the relevance of Twinning as a mechanism to EU assistance (1. Regulatory framework and institutional set-up and 2. Added-value, complementarity and coherence) and three sectoral questions assessing the contribution of Twinning in building capacities for reforms in three priority sectors identified in the ToRs (3. Public finance management (PFM), 4. Rule of law and 5. Economic governance and competitiveness¹).

1.2 Introduction

Twinning was initiated by the European Commission in 1998 in an enlargement context, to help candidate countries to prepare for EU membership by strengthening their administrative and judicial capacity to transpose, implement and enforce the EU *acquis*. At the end of 2003, Twinning was extended to neighbourhood countries in the South that had signed Association Agreements with the EU, and in 2004 to the East, for countries that had concluded Partnership and Cooperation Agreements. In this context, Twinning aimed to upgrade the capacities of the partner country's public administration through staff training, support to reorganising structures, and assistance with approximating national laws, regulations and quality standards to those of EU MS.

1.3 Twinning projects in the years 2010-2017

639 Twinning project fiches were circulated over the period 2010-2017, which resulted in 527 projects implemented across 20 partner countries for a total contracted amount of €556.1m. There were 272 projects in enlargement countries (total contracted amount: €252.5m) and 255 projects in the neighbourhood region (total contracted amount: €303.6m), of which 129 in the South and 126 in the East.

The highest number of projects was recorded in Croatia (69), followed by Serbia (46), North Macedonia (42) and Turkey (37). The largest uptake of Twinning in ENI South was recorded in Tunisia (34 projects) and Algeria (28 projects). In the East, Ukraine and Azerbaijan came first and second with 34 projects and 33 projects respectively.

In total, the administrations of 24 EU MSs were involved in Twinning projects over the period, either as lead or junior partner. France implemented the highest number of projects as lead partner (101), of which 69 projects were in ENI South, representing more than half of all projects implemented in that region. Germany came second with 69 projects, of which 36 in IPA and 33 in ENI countries. Austria implemented the highest number of projects in the Western Balkans (43).

In total, 94 Twinning light projects (18% of the total number of projects) were implemented for €21m representing 4% of the total funding. The majority of them (84%) were implemented in the Western Balkans (including Croatia, which benefited from 42 Twinning light projects over the period).

Projects in the field of economic competitiveness and governance represented 46% of the total funding spent over the period followed by rule of law projects (24%) and public finance management projects (15%). Hence, the sectors that are the subject of their own EQs constitute 85% of all Twinning expenditure.

1.4 Main findings

- The FR and the guidance provided by the TM constitute a robust framework, which enabled the implementation of 527 Twinning projects across 20 partner countries. The TM was subject to a rigorous

¹ The focus of sectoral questions were narrowed down to tax and external audit (PFM), democratic institutions and fight against corruption (rule of law) and agriculture & fisheries and energy (economic governance & competitiveness)

review starting in 2014 and involving widespread and intensive consultation with EU MSs, EUDs and various Commission Services, as well as studies and analyses performed by DG NEAR, culminating in a new version that was published in 2017 and updated in November 2018. As well as simplifying procedures, increasing flexibility and harmonising rules and processes across IPA and ENI regions, TM 2017 puts more emphasis on results, and embeds the concept of mainstreaming public administration reform in the Twinning mechanism.

- Overall, stakeholders in both EU member states (MS) and partner countries (PC) are generally satisfied with the mechanism and appreciate the positive contributions it can make to reform processes as a capacity-building tool based on the exchange of public sector expertise. PCs recognise the added value of Twinning over other instruments, when the expertise required was only available in the public sector and/or the peer-to-peer cooperation was more suited than TA to transfer know-how and gain access to the knowledge and experience of an entire institution, as well as foster partnerships between EU and PC public administrations.
- In recent years, statistics reveal a relative decline in the uptake of Twinning, with fewer TPFs being circulated and fewer EU MS submitting proposals. The factors underlying this trend include: the impact of budgetary constraints on staffing levels in public administrations, reducing EU MSs' ability and willingness to 'lose' key staff members for several years; shortcomings in Twinning-related legal and regulatory frameworks in some MS; geo-political developments resulting in weaker political commitments to reforms and/or less secure environments in some PCs; and the possibility for MS public administrations to be involved in other forms of peer-to-peer cooperation, avoiding the perceived complexity and restrictions of Twinning arrangements by means of action grants or delegation agreements.
- While most projects reviewed by this evaluation appear to have reached their mandatory results, strengthening the capacities of beneficiary institutions in their specific fields, evidence of long-term impact was more elusive, especially when projects tackled more complex sectors with a wide range of contributory factors outside their scope of intervention. This does not mean that projects have not had any impact.
- The evaluation identified a number of shortcomings in the Twinning project cycle, which affected the potential of the mechanism to deliver changes and partly explain the decline observed in the mechanism take-up, including: sub-optimal consultations in PC and at times inoperative communication channels in MS at design stage; weak intervention logics and performance frameworks; a lower interest of MS administrations narrowing the choice of partner countries; over-ambitious work plans (in pre TM 2017 period); and a lack of synergies with other initiatives.
- Given that TM 2017 was only recently introduced, the evaluation could not assess its impact on the performance of Twinning projects. While most stakeholders welcomed the new manual, there were also concerns about some of its innovations and a universal demand for more training and clarifications, including how to apply the principles of public administration about which there is limited knowledge among Twinning stakeholders.

1.5 Conclusions

The report drew the following 12 conclusions, which have been organised around four clusters.

Cluster 1: Overall performance, impact and results.

Conclusion 1: Twinning has made a positive contribution to achieving the EU's objectives through effective exchange of public sector expertise: By harnessing expertise from the public administration of 24 EU Member States through 527 Twinning projects implemented across 20 partner countries in 2010-2017, Twinning has been largely successful in helping to take forward the EU's enlargement and neighbourhood policies through institution-building.

Conclusion 2: Twinning is adaptable to contrasting policy contexts: Twinning has proven to be an adaptable delivery modality, applicable in different sectors as shown by the examples of PFM, RoL and ECG, although with varying degrees of impact.

Conclusion 3: Diminishing take-up of Twinning raises question about its future relevance, in the context of alternative modalities for peer-to-peer cooperation: Despite widespread satisfaction with Twinning, a

decline in the mechanism take-up, particularly in ‘old’ EU Member States, could present an ‘existential threat’ to Twinning in the face of alternative modalities.

Conclusion 4: *Twining is more appropriate when it responds to well-identified operational needs of the host administration in the context of advanced and comprehensive reform processes* : Twinning has proven its worth in helping PCs to put in place operational solutions to specific problems as well as stimulating a dialogue about policy options, in particular when the project is able to build on already existing capacities/frameworks in the context of a wider programme to support reforms in the sector through peer-to-peer partnerships.

Cluster 2: Regulatory framework and institutional set-up

Conclusion 5: *The Twinning framework in the evaluation period was robust, but often considered too rigid by stakeholders, who generally welcomed the simplification and harmonisation introduced in TM 2017*: Twinning benefited from a robust Twinning regulatory framework, but the rigidity of some of the rules, and more critically, the overly strict and excessive interpretation of them has often affected project performance and may partly explain the declining Twinning take-up among EU and PC administrations although they are many other contributory factors.

Conclusion 6: *The 2017 Twinning Manual is a step in the right direction, but it is too soon to evaluate its effects*: TM 2017 has already sought to address many of the concerns and constraints identified by the European Commission, MS’ and PCs in the evaluation period, by placing the emphasis on results and simplifying and harmonising project management. It is too early to say whether the improvements in the TM since 2017 will arrest the decline in take-up. However, it is clear that stakeholders are insufficiently acquainted with the changes introduced by the new TM.

Cluster 3: Added-value, complementarity and coherence

Conclusion 7: *Twining fills a niche in the range of EU instruments, which contributes to its added value. However, most partner countries and EU Delegations do not have a system in place to compare the advantages and disadvantages of Twinning with other implementation modalities*: Twinning adds a valuable modality to the EU’s range of instruments for conducting enlargement and neighbourhood policies, allowing close cooperation between peers in public administration and facilitating the adoption of the *acquis communautaire* and EU norms and standards. However, a systematic framework is currently lacking to select Twinning among the other implementation modalities.

Conclusion 8: *Twining complements other modalities and vice versa, but explicit coordination is less common*: While Twinning has its own distinct specificities, and hence there seems to be no overlap in the parameters of Twinning with other EU delivery mechanisms (TAIEX, SIGMA, delegation agreements under indirect management, action grants, budget support and technical assistance), there is complementarity, but less often overt coordination, i.e. a combined / sequenced deployment of assistance to achieve common specific objectives.

Conclusion 9: *There is limited awareness of public administration principles and a demand for more guidance on how to apply them in the context of Twinning*: While Twinning contributed in some cases to more accountable and efficient public administration (e.g. by improving governance and services to citizens), the application of the principles of public administration was weak, which sometimes undermined the impact and sustainability of TP results. This should change as the effects of the new TM are felt, but stakeholders appear in need of guidance how to put the principles into practice.

Cluster 4: Project design, selection and implementation

Conclusion 10: *The quality of Twinning project design is affected by insufficient assessment, consultation and dialogue, and weak intervention logic*: The design of TPs was undermined by insufficient inputs from external expertise and stakeholders, not always taking full account of absorption capacity in the PC, and flawed intervention logic. The TM 2017 emphasis on results rather than activities, and the clarification that ‘mandatory results’ means concrete operational results, which should be expressed in measurable terms, are both helpful and appropriate.

Conclusion 11: *Lower interest from MS administrations and a lack of information about MSs systems undermined the process of matching PC needs with MS expertise*: Statistics are showing increasingly diminishing response from MS administrations, with a growth of solo or zero bids and a strong presence of a

limited number of MSs in some countries and sectors. PCs often lack reference points (MS performance in these policy areas) to make an informed judgement on MS applications.

Conclusion 12: Opportunities are not being maximised to extract full value from Twinning's achievements, during and after project implementation: Twinning achievements are not sufficiently capitalised, publicised and disseminated. This starts with inadequate monitoring of ongoing TP performance, and lack of follow-up of completed projects to assess the achievement of mandatory results and other effects. It also reflects low-key promotion and low visibility of Twinning, and the lack of effective exchange tools to highlight inspiring practices and results.

1.6 Recommendations

The report made the following twelve recommendations organised in three clusters:

Cluster 1: Regulatory framework and institutional set-up

Recommendation 1: Increase awareness and understanding of the provisions of TM 2017 by guiding, training and supporting both PC and MS administrations, and address the divergent understanding of how to interpret TM provisions, making the most of the network of NCPs.

Recommendation 2: Address Member State barriers to officials' involvement in Twinning by improving MS legal and institutional environment for Twinning.

Recommendation 3: Reinforce European Commission's capacities at headquarters and in delegations to manage Twinning and implement recommendations contained in this report.

Cluster 2 Added-value, complementarity and coherence

Recommendation 4: Optimise Twinning's synergies with other modalities to strengthen its contribution to realising reform goals by ensuring that Twinning is embedded in more extensive and long-term sector programmes.

Recommendation 5: Provide support to PCs in applying the principles of public administration in TPs, particularly in the programming of Twinning and preparation of TPFs and ensure their application during implementation.

Cluster 3 Project design, selection and implementation

Recommendation 6: Help PCs improve the quality of Twinning project design, to increase the relevance and focus of Twinning projects and improve the likelihood of impact and sustainability.

Recommendation 7: Promote EU benchmarking tools to PC administrations to guide PC administrations in their choice of MS partners.

Recommendation 8: Encourage consortiums and exchange of expertise across TPs to broaden the perspectives of PC administrations, including by enabling projects to transfer experience from one PC to another.

Recommendation 9: Build a comprehensive management information system (MIS) for the benefit of the entire Twinning community and promote monitoring and evaluation practices, including (but not only) by means of TRMs.

Recommendation 10: Capitalise the results of Twinning and promote exchange of inspiring practices to make more effective use of lessons learned from recent and ongoing Twinning projects and generate interest in designing new TPs to replicate or follow-up their successes.

Recommendation 11: Improve visibility of Twinning and the EU's role to raise the profile of Twinning among EU MS, PCs and stakeholders and elicit greater interest and recognition.

Recommendation 12: Review Twinning's state of play in 2021 and explore the merits of alternative scenarios which would strengthen the interest of MS administrations and their engagement in Twinning, thereby increasing Twinning relevance and effectiveness in matching PC needs with MS public sector expertise. Such a review is essential to ensure the future of the mechanism, particularly in the context of a possible geographical extension of Twinning beyond the enlargement and neighbourhood regions.

1 Résumé exécutif

1.1 Objectif et portée de l'évaluation

L'objectif de l'évaluation est d'évaluer de façon indépendante la performance globale du mécanisme de jumelage administratif durant la période 2010-2017. Les constats, conclusions et recommandations du rapport sont destinés à alimenter le débat sur l'avenir de l'instrument de jumelage en tant que modalité de mise en œuvre destinée à aider les pays de l'élargissement et du voisinage à tenir leurs engagements respectifs dans le cadre de leurs relations avec l'Union européenne (UE).

Conformément aux termes de référence, l'évaluation couvre la période 2010-2017 ainsi que tous les États membres de l'UE et les 20 pays partenaires qui ont bénéficié d'au moins un projet de jumelage au cours de cette période.

Réalisée de février 2018 à février 2019, l'évaluation s'articule autour de cinq questions d'évaluation (QE), à savoir deux questions transversales examinant les conditions de mise en œuvre du jumelage dans le temps et la pertinence du jumelage en tant que mécanisme d'assistance communautaire (*QE 1. Cadre réglementaire et dispositif institutionnel* et *QE 2. Valeur ajoutée, complémentarité et cohérence*) et trois questions sectorielles évaluant la contribution du jumelage au renforcement des capacités de réforme dans trois secteurs prioritaires identifiés dans les termes de référence (*QE 3. Gestion des finances publiques*, *QE 4. État de droit* et *QE 5. Gouvernance économique et compétitivité*²).

1.2 Introduction

Le jumelage, en tant que modalité de mise en œuvre de l'aide externe de l'UE, a été lancé par la Commission européenne en 1998 dans le contexte de l'élargissement afin d'aider les pays candidats à se préparer à l'adhésion à l'UE en renforçant notamment leur capacité administrative et judiciaire à transposer, mettre en œuvre et appliquer l'acquis communautaire. Par la suite, le jumelage a été étendu aux pays participant à la politique européenne de voisinage (PEV), tout d'abord, en 2003, avec les partenaires méditerranéens ayant un accord d'association avec l'UE (PEV-Sud) et, ensuite en 2004, avec les pays du partenariat oriental (PEV-Est). Dans ce contexte, le jumelage vise à renforcer les capacités de l'administration publique des pays partenaires grâce à la formation du personnel et au soutien institutionnel et au rapprochement de la législation, des réglementations et des normes nationales avec celles des États membres de l'Union européenne.

1.3 Projets de jumelage au cours de la période 2010-2017

639 fiches de projets de jumelage ont été circulées au cours de la période 2010-2017 permettant la mise en œuvre de 527 projets à travers 20 pays partenaires pour un montant total de 556,1 Mio EUR. 272 projets ont été mis en œuvre dans les pays de l'élargissement (montant total des contrats : 252,5 Mio EUR) et 255 projets dans la région du voisinage (montant total des contrats : 303,6 Mio EUR), dont 129 dans la zone Sud et 126 dans la zone Est.

Le plus grand nombre de projets a été recensé en Croatie (69), suivie par la Serbie (46), la Macédoine du Nord (42) et la Turquie (37). Le plus grand nombre de jumelages dans les pays PEV-Sud a été enregistré en Tunisie (34 projets) et en Algérie (28 projets). À l'Est, l'Ukraine et l'Azerbaïdjan se sont classés premier (34 projets) et deuxième (33 projets) respectivement.

Au total, les administrations de 24 États membres de l'UE ont pris part à des projets de jumelage au cours de la période, en tant que chef de file ou partenaire junior. La France a mis en œuvre le plus grand nombre de projets en tant que chef de file (101), dont 69 dans les pays PEV-Sud, soit plus de la moitié des projets mis en œuvre dans cette région. L'Allemagne arrive en deuxième position avec 69 projets, dont 36 dans les pays de l'élargissement et 33 dans les pays PEV. L'Autriche a mis en œuvre le plus grand nombre de projets dans les Balkans occidentaux (43).

Au total, 94 projets de jumelage «léger» (18% du nombre total de projets) ont été mis en œuvre pour un montant total de 21 M€, soit 4% du financement global alloué au jumelage. La majorité d'entre eux (84 %) ont été mis en œuvre dans les Balkans occidentaux (y compris la Croatie, qui a bénéficié de 42 projets de jumelage léger sur la période).

² Les questions sectorielles se sont limitées à la fiscalité et à l'audit externe (PFM), aux institutions démocratiques et à la lutte contre la corruption (État de droit), à l'agriculture et la pêche et à l'énergie (gouvernance économique et compétitivité).

Les projets dans le domaine de la compétitivité économique et de la gouvernance ont représenté 46 % du financement total déboursé au cours de la période, suivi par les projets relatifs à l'État de droit (24 %) et à la gestion des finances publiques (15 %). Par conséquent, les projets qui font l'objet des questions sectorielles représentent 85 % de toutes les dépenses de jumelage.

1.4 Principaux constats

- Le Règlement Financier et les instructions du Manuel de Jumelage (MJ) constituent un cadre solide qui a permis la mise en œuvre de 527 projets de jumelage au travers de 20 pays partenaires. Le MJ a fait l'objet d'un examen rigoureux à partir de 2014 sur la base d'une consultation étendue et intensive avec les États membres de l'UE, les Délégations de l'UE (DEU) et divers services de la Commission, qui complémentèrent les analyses réalisées par la DG NEAR. Cet effort aboutit à une nouvelle version du manuel publiée en 2017 et actualisée en novembre 2018. Outre qu'il simplifie les procédures, accroît la flexibilité et harmonise les règles et les processus entre les régions de l'élargissement et du voisinage, le MJ 2017 met davantage l'accent sur les résultats et intègre les principes de la réforme de l'administration publique dans le mécanisme de jumelage.
- Dans l'ensemble, les parties prenantes des États membres et des pays partenaires (PP) de l'UE sont satisfaites du mécanisme et apprécient les contributions positives qu'il peut apporter aux processus de réforme en tant qu'outil de renforcement des capacités fondé sur l'échange de compétences du secteur public. Les PP reconnaissent la valeur ajoutée du jumelage par rapport à d'autres instruments de l'UE, en particulier lorsque l'expertise recherchée n'est disponible que dans le secteur public et/ou lorsque la coopération entre pairs s'avère plus adaptée que l'assistance technique pour transférer le savoir-faire et accéder aux connaissances et à l'expérience d'une institution dans son ensemble, ainsi que pour encourager les partenariats entre les administrations publiques européennes et celles des pays partenaires.
- Les statistiques, ces dernières années, révèlent un déclin relatif du jumelage, qui se traduit par une circulation moindre des fiches de jumelage (FJ) et une diminution du nombre de candidatures par les administrations des États membres de l'UE en réponse aux appels à propositions. Les facteurs qui expliquent cette évolution sont nombreux : il s'agit entre autres de l'impact des contraintes budgétaires sur les effectifs des administrations publiques, d'une réticence grandissante des États membres de l'UE à se priver de membres-clés du personnel pendant plusieurs années, de dispositions juridiques et réglementaires inappropriées au jumelage dans certains États membres, des évolutions géopolitiques entraînant une diminution de la volonté politique en faveur des réformes et/ou un environnement moins sûr dans certains PP, de la possibilité dont bénéficient les administrations publiques des PP d'être associées à d'autres formes de coopération entre pairs ainsi que de contourner la complexité et les restrictions (perçues ou non) du mécanisme de jumelage en ayant recours à d'autres modalités de mise en œuvre (subvention ou convention de délégation).
- Si la plupart des projets examinés dans le cadre de la présente évaluation semblent avoir atteint les résultats exigés par les accords de jumelage, contribuant ainsi au renforcement des capacités des institutions bénéficiaires dans leurs domaines spécifiques, les preuves d'un impact à long terme sont plus difficiles à établir, en particulier lorsque les projets concernent des secteurs complexes où un large éventail de facteurs externes ont pu jouer un rôle déterminant. Cela ne signifie pas, cependant, que ces projets n'aient pas eu d'impact.
- L'évaluation a mis en évidence un certain nombre de lacunes dans le cycle de projet de jumelage qui ont influé sur la capacité du mécanisme à apporter des changements et peuvent expliquer en partie la participation déclinante des États membres et des pays partenaires; consultations sous-optimales des pays partenaires et canaux de communication parfois inopérants au sein des EM au stade de la conception, des logiques d'intervention et des cadres de performance imparfaits, un intérêt moindre de la part des administrations des États Membres qui restreint le choix des administrations bénéficiaires, des plans de travail trop ambitieux; et un manque de synergies avec les initiatives connexes.
- L'évaluation n'a pas pu mesurer l'impact du nouveau manuel - introduit seulement en juillet 2017 - sur la performance des projets. Si les parties prenantes l'ont pour la plupart accueilli favorablement, nombre d'entre elles ont émis des réserves concernant certaines de ses innovations et souhaiteraient davantage de formation et de clarifications, notamment sur la manière d'appliquer les principes de l'administration publique, dont les porteurs de projets de jumelage sont peu familiers.

1.5 Conclusions

Le rapport formule douze conclusions organisées autour de quatre thèmes.

Thème 1: Performance générale, impact et résultats.

Conclusion 1 : Le jumelage a contribué de façon positive à la réalisation des objectifs de l'UE en favorisant un échange fructueux d'expertise au sein du secteur public: En mobilisant l'expertise de l'administration publique de 24 États membres de l'UE par le biais de 527 projets de jumelage mis en œuvre entre 2010 et 2017 dans 20 pays partenaires, le jumelage a permis de renforcer les capacités institutionnelles dans les pays partenaires, contribuant ainsi aux politiques d'élargissement et de voisinage de l'UE.

Conclusion 2 : Le jumelage s'est avéré adaptable à des contextes politiques contrastés : Le jumelage s'est avéré être une modalité de mise en œuvre souple, s'appliquant à différents domaines et contextes, tel que l'illustrent les exemples dans les secteurs de la gestion des finances publiques, de l'Etat de droit et de la gouvernance économique, avec cependant des degrés d'impact variables.

Conclusion 3 : La popularité décroissante du jumelage soulève la question de sa pertinence future en face de modalités alternatives pour organiser la coopération entre pairs : En dépit de la satisfaction générale à l'égard du jumelage, le mécanisme est de moins en moins sollicité, en particulier dans les "anciens" États membres de l'UE, ce qui pourrait représenter une "menace existentielle" pour le mécanisme face aux alternatives disponibles.

Conclusion 4 : Le jumelage est plus approprié quand il répond à des besoins opérationnels bien identifiés de l'administration hôte dans le contexte d'un processus avancé de réformes d'ensemble: le jumelage a fait ses preuves en aidant l'administration des pays partenaires à mettre en place des solutions opérationnelles à des problèmes spécifiques et en stimulant un dialogue sur les options politiques, notamment lorsque le projet peut s'appuyer sur un partenariat solide et des capacités et des structures déjà existantes dans le cadre d'un programme de réforme sectoriel d'ensemble.

Thème 2: Cadre réglementaire et dispositif institutionnel

Conclusion 5 : Le cadre du jumelage au cours de la période d'évaluation s'est révélé solide quoique souvent considéré trop rigide par les parties prenantes, qui ont salué la simplification et l'harmonisation introduites par la Manual de Jumelage 2017 : Le jumelage a bénéficié d'un cadre réglementaire solide, mais la rigidité de certaines règles, et surtout leur interprétation trop stricte ou excessive, a parfois affecté les performances des projets, contribuant en partie à la baisse de popularité du mécanisme auprès des administrations de l'UE et des pays partenaires, bien que d'autres facteurs ont également joué un rôle déterminant à cet égard.

Conclusion 6 : Le Manuel de jumelage 2017 est un pas dans la bonne direction, mais il est trop tôt pour en évaluer les effets : La MJ 2017 apporte une réponse à bon nombre des préoccupations et des contraintes identifiées par les parties prenantes au cours de cette évaluation, notamment en mettant l'accent sur les résultats et en simplifiant et en harmonisant la gestion des projets. Il est trop tôt pour dire si ces améliorations permettront d'enrayer la baisse d'intérêt observée pour le mécanisme de jumelage ces récentes années. Toutefois, il est clair que les parties prenantes ne sont pas suffisamment au courant des changements introduits par le nouveau manuel.

Thème 3 Valeur ajoutée, complémentarité et cohérence

Conclusion 7 : Le jumelage remplit un créneau dans la gamme des instruments de l'UE, ce qui participe à sa valeur ajoutée. Cependant, la plupart des pays partenaires et des Délégations de l'UE ne disposent d'aucun système leur permettant de comparer les avantages et les inconvénients du jumelage par rapport aux autres modalités de mise en œuvre: Le jumelage ajoute une modalité précieuse à la gamme des instruments dont dispose l'UE pour mener les politiques d'élargissement et de voisinage, permettant une coopération rapprochée entre pairs dans l'administration publique et facilitant l'adoption de l'acquis communautaire et des normes et standards de l'UE. Cependant, un cadre systématique fait actuellement défaut pour sélectionner le jumelage parmi les autres modalités de mise en œuvre.

Conclusion 8 : Le jumelage est complémentaire avec les autres modalités de l'UE et vice versa, mais une coordination explicite est plus rare : le jumelage ayant ses propres spécificités et paramètres, il n'y a pas de duplication apparente avec les autres mécanismes de mise en œuvre de l'UE (TAIEX, SIGMA, accords de délégation sous gestion indirecte, subventions d'action, soutien budgétaire et assistance technique). S'il existe

une complémentarité entre ces instruments, leur déploiement combiné / séquentiel dans le cadre d'objectifs communs est moins fréquent.

Conclusion 9 : *Il y a un manque de connaissance et de compréhension concernant les principes de l'administration publique parmi les parties prenantes qui souhaiteraient davantage d'informations et de conseils sur la manière de les appliquer dans le contexte du jumelage:* Si le jumelage, dans certains cas, a contribué à une administration publique plus responsable et plus efficace (par exemple en améliorant la gouvernance et les services aux citoyens), l'application des principes de l'administration publique a été faible, ce qui a parfois compromis l'impact et la durabilité des projets. Ceci devrait changer à mesure que les effets du nouveau manuel se font sentir, mais les parties prenantes semblent avoir besoin de conseils sur la manière de mettre ces principes en œuvre.

Thème 4 Conception, sélection et mise en œuvre des projets

Conclusion 10 : *Les projets de jumelage sont souvent affectés par un niveau insuffisant d'analyse, de concertation et de dialogue au moment de leur conception et par une logique d'intervention peu rigoureuse :* La conception des projets de jumelage a été fragilisée par un niveau insuffisant de consultation des parties prenantes et d'analyse des capacités d'absorption dans le pays partenaires, ainsi que par une logique d'intervention défectueuse. L'accent mis par le MJ 2017 sur les résultats plutôt que sur les activités, et la clarification du fait que les "résultats obligatoires" signifient des résultats opérationnels concrets devant être exprimés en termes mesurables, sont des améliorations bienvenues.

Conclusion 11 : *Un intérêt moindre de la part des administrations des Etats membres et un manque d'informations sur les systèmes en vigueur dans les États membres rendent plus ardu le processus par lequel les besoins des pays partenaires sont mis en rapport avec les compétences des États membres :* Les statistiques révèlent une réponse de plus en plus limitée des administrations des Etats membres, avec une croissance d'offres avec un seul Etat membre ou d'appels à propositions infructueux et une présence d'un nombre limité d'Etats membres dans certains pays et/ou secteurs. De plus, les pays partenaires manquent souvent de points de référence sur la performance des Etats membres dans les domaines d'action qui les intéressent, les empêchant de procéder à un choix pertinent.

Conclusion 12 : *Toutes les possibilités ne sont pas exploitées pour tirer pleinement parti des réalisations du jumelage pendant et après la mise en œuvre des projets :* Les résultats des jumelages ne sont pas suffisamment capitalisés, rendus publics et diffusés. En plus d'un suivi inadéquat de la performance des projets lors de leur mise en œuvre et d'une carence d'évaluation après leur achèvement, la visibilité du jumelage souffre d'un manque de promotion, ainsi que de l'absence d'outils d'échange efficaces pour mettre en lumière et diffuser les pratiques et les résultats probants.

1.6 Recommandations

Le rapport décline douze recommandations organisées autour de quatre thèmes.

Thème 1 : Cadre réglementaire et dispositif institutionnel

Recommandation 1 : Accroître la sensibilisation et la compréhension des dispositions du Manuel de Jumelage 2017 en guidant, en formant et en soutenant les administrations des pays partenaires et des Etats membres, et remédier à l'interprétation divergente des dispositions du manuel, en tirant le meilleur parti du réseau des Points de Contact Nationaux.

Recommandation 2 : Éliminer les obstacles qui s'opposent à la participation des fonctionnaires des États membres au jumelage en améliorant l'environnement juridique et institutionnel dans ces pays en faveur du jumelage.

Recommandation 3 : Renforcer les capacités de la Commission européenne tant au Siège que dans les délégations pour gérer le jumelage et mettre en œuvre les recommandations contenues dans ce rapport.

Thème 2 : Valeur ajoutée, complémentarité et cohérence

Recommandation 4 : Optimiser les synergies avec les autres modalités de mise en œuvre afin de renforcer la contribution du jumelage à la réalisation des objectifs de réformes en veillant à l'intégration des projets dans des programmes sectoriels à long terme plus vastes.

Recommandation 5 : Appuyer les pays partenaires dans l'application des principes de l'administration publique dans les projets de jumelage, depuis la préparation des fiches de projets jusqu'à la mise en œuvre des activités.

Thème 3 : Conception, sélection et mise en œuvre des projets

Recommandation 6 : Aider les pays partenaires à améliorer la qualité de la conception des jumelages, afin d'accroître la pertinence et le ciblage des projets et accroître la probabilité de leur impact et de leur durabilité.

Recommandation 7 : Encourager l'UE à développer des outils d'évaluation comparative afin de guider les administrations bénéficiaires dans le choix de leurs partenaires au sein des États membres.

Recommandation 8 : Stimuler les consortiums et l'échange d'expertise entre les projets de jumelage afin d'élargir les perspectives des administrations des pays partenaires, notamment en permettant aux projets de transférer leur expérience d'un pays partenaire à un autre.

Recommandation 9 : Mettre en place un système intégré de gestion de l'information au bénéfice de l'ensemble de la communauté des jumelages et promouvoir les pratiques de suivi et d'évaluation, notamment (mais pas seulement) au moyen de missions d'évaluation des jumelages.

Recommandation 10 : capitaliser les résultats des jumelages et promouvoir l'échange des bonnes pratiques afin de faire un usage plus efficace des enseignements tirés des projets récents et en cours et de susciter un intérêt pour la conception de nouveaux projets se basant sur les expériences réussies ou en relançant ces dernières.

Recommandation 11 : Améliorer la visibilité du jumelage et le rôle de l'UE pour mieux faire connaître le jumelage aux administrations des États membres et des pays partenaires et susciter un intérêt et une reconnaissance accrues.

Recommandation 12 : Effectuer un examen sur l'état d'avancement du jumelage en 2021 et explorer des scénarios alternatifs qui renforceraient l'intérêt des administrations des États membres et leur engagement dans le jumelage permettant ainsi d'accroître la pertinence et l'efficacité du mécanisme pour mobiliser les compétences du secteur public des États membres au profit de l'administration des pays partenaires. Un tel examen est essentiel pour assurer l'avenir du mécanisme, notamment dans le contexte d'une éventuelle extension géographique du jumelage au-delà des régions visées aujourd'hui par les politiques d'élargissement et de voisinage.

2 INTRODUCTION

2.1 Objectives and scope of the evaluation

The purpose of the evaluation is to provide an overall, independent, evidence-based assessment of the contribution that Twinning has made in supporting candidate and potential candidate beneficiaries and neighbourhood countries to meet their respective commitments in the framework of their relationships with the European Union (EU) in the period 2010-2017.

The results of the evaluation will serve to inform: (i) a potential technical or administrative reorientation of the Twinning mechanism itself; (ii) further steps to achieve greater synergies with the EU's political and reform objectives; as well as (iii) the overall programming of financial assistance having in mind the complementarity of the tools available for implementing assistance in Partner Countries.

The evaluation covered the period 2010-2017, and all EU Member States (including Croatia from 1 July 2013) and the following 20 partner countries/beneficiaries that have benefited from at least one Twinning project in the period under consideration:

TABLE 1: GEOGRAPHICAL SCOPE OF THE EVALUATION

Enlargement IPA	Neighbourhood South ENI South	Neighbourhood East ENI East
Albania (AL)	Algeria (DZ)	Armenia (AR)
Bosnia & Herzegovina (BA)	Egypt (EG)	Azerbaijan (AZ)
Croatia (HR) ³	Israel (IS)	Georgia (GE)
North Macedonia (MK)	Jordan (JO)	Moldova (MD)
Kosovo* (KS)	Lebanon (LB)	Ukraine (UA)
Montenegro (ME)	Morocco (MA)	
Serbia (RS)	Tunisia (TN)	
Turkey (TR)		

The evaluation was organised around three transversal and two sector questions:

EQ1 - Regulatory framework, institutional set-up, programming approach and other conditions of implementation

To what extent, and how, have the regulatory and institutional set-up, programming approach and implementation procedures of Twinning influenced the capacity of Twinning projects to generate the expected (mandatory) outputs and contribute to the achievement of outcomes and impacts? What other factors – organisational, human, technical or financial – have influenced the performance of Twinning? Have the changes introduced in this overall set up and approach over time been beneficial? Were they sufficient to enhance Twinning as an institutional-building tool?

EQ 2 - Added value, complementarity and coherence

To what extent has Twinning added value as an institution-building instrument, compared to other forms of EU assistance, and enhanced synergies with them as well as with other donors' initiatives? As evidence of added value, to what extent has the use of Twinning ensured coherence with and contributed to general public administration reform efforts?

EQ 3 - Public finance management

To what extent has the use of Twinning contributed to the improvement of sound public financial management in line with candidate countries, potential candidates and neighbourhood countries' public financial management strategies?

EQ 4 - Rule of law

To what extent has the use of Twinning in the area of rule of law contributed to strengthening the institutional setting in line with good governance principles and the effective functioning of the institutions guaranteeing democracy and rule of law in candidate countries, potential candidates and neighbourhood countries? In case this did not happen, what were the obstacles encountered?

³ Up to 30 June 2013

* This designation is without prejudice to positions on status and is in line with UNSCR 1244 and the ICJ Opinion on the Kosovo Declaration of Independence.

EQ 5 - Economic governance and competitiveness

To what extent has the use of Twinning in the area of trade and competitiveness contributed to the improvement of the relevant institutional frameworks and structures and therefore contributed to socio-economic development of candidate, potential candidate and neighbourhood countries by inter alia an improvement of the business climate, an increased competitiveness of the economy and a better economic integration with the EU? In case this did not happen, what were the obstacles encountered?

During the inception phase, the focus of the sectoral questions were narrowed down to the following areas:

- **PFM:** tax and external audit for PFM,
- **Rule of law:** democratic institutions and fight against corruption
- **Economic governance & competitiveness:** agriculture & fisheries and energy

2.2 Purpose and structure of the final report

The final report presents a synthesis of the work and analyses carried out during the inception, desk and field phases, which served as a basis for our conclusions about the performance of Twinning over the period – in terms of results, outcomes and impact achieved - and formulating recommendations for the future of the mechanism.

The report consists of nine sections.

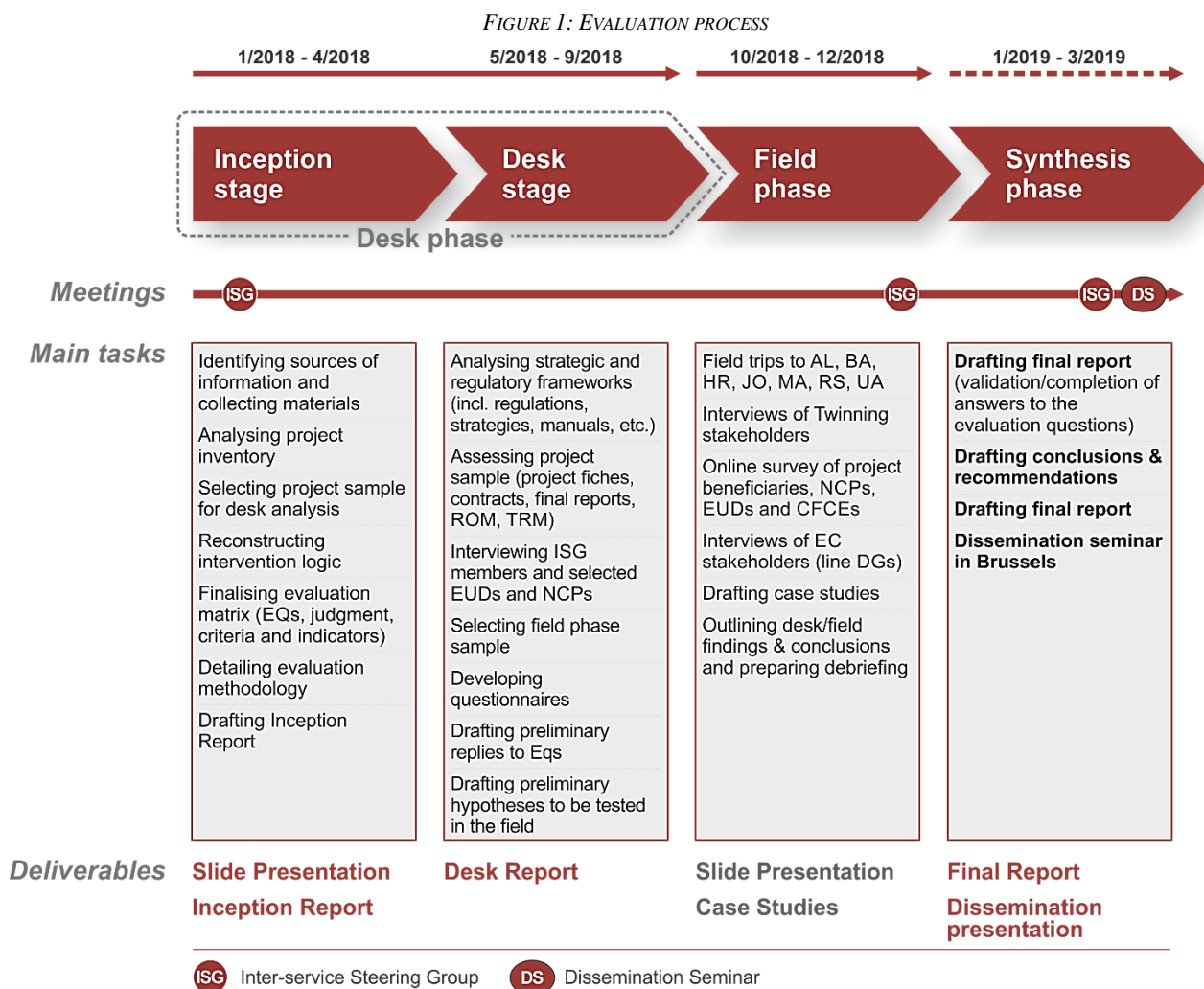
- **Section 1** is the executive summary presenting the evaluation's main findings, conclusions and recommendations.
- **Section 2** provides a reminder of the objectives and scope of the evaluation as set out in the ToR, and outlines the purpose and structure of the final report.
- **Section 3** describes the work carried out during each of the four evaluation phases, outlining the approach adopted and the tools used to collect and analyse information and data. It also presents the challenges faced by the evaluators in carrying out their activities and the limitations of the analysis in terms of data availability and sources of bias.
- **Section 4** describes the overall framework of Twinning in both the enlargement and neighbourhood regions, and its evolution over time, as well as the contextual factors influencing the use of Twinning in eligible countries.
- **Section 5** analyses the coverage of Twinning interventions per region, country and sector over the period under evaluation.
- **Section 6** presents the final answers to the five evaluation questions drawing on the analysis performed in the evaluation matrix against the agreed judgement criteria and indicators of achievement (See Volume II, Annex 4).
- **Section 7** articulates all the evaluation findings and conclusions to present an overall assessment of Twinning.
- **Section 8** draws conclusions on the relevance, conditions of implementation and performance of Twinning and identifies lessons learned, both positive and negative.
- Finally, **Section 9** formulates recommendations to address the weaknesses identified and sketches out the possible conditions for their implementation.

Annexes to the report are presented in Volume II.

3 KEY METHODOLOGICAL ELEMENTS

3.1 Overall evaluation approach and evaluation stages

The evaluation consisted of four phases in line with the TORs conducted under the supervision of DG NEAR MFF, Programming and Evaluation Unit A4. The evaluation team reported to an Inter-service Steering Group consisting of representatives from the EC and Twinning National Contact Points (NCPs) in EU Member States (MSs). Figure 1 shows the main steps of the evaluation process.



The **inception phase** (January-April 2018) set the parameters for the entire evaluation. Building on the draft evaluation questions and judgment criteria provided by the ISG, the evaluation team completed the evaluation matrix with full judgement criteria and indicators of achievement (See Volume II, Annex 3). The evaluation team collected and organised materials to be reviewed during the desk phase, including Twinning manuals, evaluation reports, country strategies, progress reports, action programmes and visibility and publicity materials. The evaluation team analysed the inventory of Twinning projects compiled by DG NEAR to give an overview of Twinning over the period in terms of expenditure, participation of MSs and PCs and geographical and sectoral coverage (see section 5). This analysis was the basis for selecting a sample of 36 projects for the desk review, of which 23 related to the three sector priorities identified in the ToR (PFM, rule of law, and economic competitiveness and governance)⁴. The scope of the evaluation was clarified during

⁴ The sample represented 7% of the total number of Twinning projects implemented over the period (527). The sample value amounted to €41.4m or 7% of the total budget of twinning projects implemented over the period. The sample covered 15 partner countries and 14 EU MSs (see Volume II, Annex 2.6)

discussions with stakeholders that took place on the occasion of the first ISG meeting (16 January 2018) and the Institution Building Days (6-7 February 2018). The inception report was approved on 28 April 2018.

During the **desk phase** (May-October 2018), the evaluation team collected the documentation available on our project sample from the EUDs and NCPs, including background materials on the political and economic context of partner countries. The team reviewed Twinning project fiches, contracts, final reports, ROM⁵ and TRM reports⁶. Each sampled project was assessed against the judgement criteria indicators, with the findings used to provide preliminary responses to the transversal and sectoral evaluation questions⁷. The evaluation team also reviewed all available twinning evaluation materials⁸ as well as mid-term evaluations of ENI and IPA instruments. To complete the analysis, interviews with selected Twinning stakeholders were organised via video conferences in early June 2018, including NCPs, PAOs, EUDs and CFCEs in three partner countries and six EU Member States. In addition, face-to-face interviews were held with ISG members, DG NEAR's Support Group for Ukraine and DG NEAR Unit C3⁹.

The evidence gathered through the desk analysis and the interviews was organised against the indicators of the evaluation matrix. This analysis was the basis for formulating preliminary replies to the evaluation questions and identify the hypotheses still to be tested during the field phase.

The desk report proposed a sample of countries and projects¹⁰ to be visited during the field phase. The sample aimed to ensure geographical and sectoral representativeness of Twinning projects implemented over the period with a focus on the priority sectors identified in the TOR i.e. PFM, rule of law and economic competitiveness and governance. To inform the replies to the sectoral evaluation questions, six case studies were selected in the following fields: external audit and revenue collection and administration for PFM, democratic institutions and anti-corruption policies for rule of law and energy and agriculture for economic competitiveness and governance. In total, the field phase sample included 33 projects¹¹ selected across seven partner countries¹².

Finally, a survey was designed to capture the views of the following stakeholders on their experience of Twinning: project partners (both from partner countries and EU MSs), NCPs, EUDs and CFCEs. The survey consisted of multiple-choice questions focusing on the topics raised in the evaluation questions. The survey was online from mid-October to the end of November 2018¹³.

The **field phase** (November-December 2018) allowed the evaluation team to gather further evidence for testing the hypotheses defined in the desk phase and replying to the transversal EQs. Six cases studies provided a more in-depth picture of several Twinning projects implemented in the three priority sectors as a basis for replying to the sectoral EQs.

Face-to-face interviews were held with Twinning beneficiaries of sampled projects, including Project Leaders (PLs), Resident Twinning Adviser (RTA) counterparts and other key beneficiaries from partner country administrations, as well as PLs and RTAs from EU MSs when available. Interviews with former EU MS lead partners (PL and/or RTA) were conducted by Skype/phone, and in some cases, face-to-face, for each project.

In every country visited, the evaluation team held meetings with the EUD and the NCP (as well as the CFCE in countries where projects were implemented in indirect management) to discuss their experience of Twinning design and implementation. The role of EU MS embassies in promoting and facilitating Twinning and the coordination with other donors were also queried during the field phase.

⁵ Given that only 13 sampled projects were monitored by ROM, 24 additional ROM reports were selected covering projects in the three priority sectors (PFM, ROL and EGC)

⁶ None of the 36 sampled projects was subject to a TRM. The evaluation team selected seven TRMs for review covering projects funded under 2010 onwards allocations.

⁷ The assessment is provided in Volume II, Annex 6

⁸ Including four Twinning country evaluations (AZ, GE, MA, and TR), three evaluations of TA programmes to support the implementation of Association Agreements in partner countries which also covered Twinning (DZ, TN, JO) and one review of Twinning projects carried out as part of the mid-term review (EG).

⁹ See Volume II, Annex 10

¹⁰ To achieve a more balanced coverage of regions and sectors one agriculture project from BiH and two taxation projects from Croatia were selected outside the original desk sample.

¹¹ Of which 18 related to the priority sectors. The full list of projects is provided in Volume II, Annex 2.6.1

¹² Four countries from IPA (Serbia, Croatia, Bosnia and Herzegovina and Albania), 2 countries from ENI South (Morocco and Jordan) and 1 country from ENI East (Ukraine). The rationale behind the choice of countries and interventions is provided in Volume II, Annex 2.6. Albania was added during the field phase (see below section 3.2).

¹³ See Volume II, Annex 5

The evaluation team also held meetings with EC stakeholders in early December to understand the involvement of line DGs in the implementation of Twinning¹⁴, as well as the experience of other services with peer-to-peer cooperation¹⁵. A final video conference call was organised to encourage NCPs who had not yet been interviewed to share their views.

After the completion of the field interviews, a team meeting was organised to exchange information among experts and review the desk report findings in the light of the field work. The team presented a summary of the evaluation findings and preliminary conclusions during a debriefing session to the ISG organised in Brussels on 13 December 2018. Comments received from ISG members were integrated into this report.

During the **synthesis phase** (January 2019), the team completed its findings, enriching the evaluation matrix with the evidence gathered during the field phase. Replies to the evaluation questions were reviewed and finalised on that basis. The overall assessment and conclusions presented at the debriefing meeting were refined, and recommendations were formulated, to address shortcomings identified in the conclusions with key steps/actions required for their implementation.

3.2 Challenges and limitations

The evaluation team faced some challenges with data collection, which slowed down evaluation work during the desk phase. The main challenge of the field phase was to **reach out to beneficiaries** involved in older projects, either through the online survey or during field visits. Overall, however, the findings, conclusions and recommendations of this evaluation supplemented desk analysis with a wide consultation of Twinning stakeholders including Twinning beneficiaries, NCPs, EUDs, CFCEs and EC line DGs¹⁶. As a result, the team is confident that the information and data used for this evaluation are sufficiently reliable and comprehensive to justify the analyses and conclusions presented in the report.

Gathering the documentation of the 36 projects that were sampled during the desk phase was time-consuming, as it required contacting the respective EUD and NCP in each partner country.

An additional issue was the **shortage of project monitoring and evaluation data**: of the 36 projects in the desk phase sample, only 13 were monitored by ROM and none of them was subject to a Twinning Review Mission (TRM). To enrich the analysis, the team reviewed an additional 24 ROM reports selected in the three priority areas (PFM, RoL and ECG) and seven TRM reports about projects funded since 2010¹⁷. It should be noted that ROM is a monitoring tool that can only provide a snapshot of the project, measuring its performance at a given moment in time, which might not correspond to its final achievements let alone its long-term impact. Similarly, TFRs are always drafted at the conclusion of the implementation period, before the project's full effects are clear, and typically include recommendations for follow-up action, which are usually crucial for the TP's impact and sustainability. TRM reports are more valuable sources in this respect, as the missions take place between 6 and 12 months after the TP's conclusion according to TM 2017, although the remit of the TRM is limited to the scope of the project, its delivery and mandatory results, rather than a wider impact assessment of the Twinning project's contribution to reform in the sector.

There were only four country evaluations dedicated to Twinning¹⁸, while three other country evaluations assessed the performance of Twinning as part of a wider evaluation of the EU-funded programmes supporting the implementation of Association Agreements with the EU¹⁹. While they provided useful overviews of Twinning arrangements and performance in partner countries, they provided limited information at project level and did not cover the priority sectors selected for this evaluation. Moreover, some of the reports were based on Twinning projects and Manuals dating back to a period not covered by the present evaluation²⁰.

To the extent possible, the evaluation team corrected and completed the information available in the project database, which contained a few inconsistencies and gaps (see Volume II, Annex 9). Data about TPF

14 Seven DGs were interviewed (DG DEVCO, DG GROW, DG JUST, DG AGRI, DG ENV, DG TAXUD, DG ENER)

15 DG DEVCO Eurosocial and Structural Reform Support Service

16 In total, the evaluation team reached out to 571 stakeholders, of which 230 through interviews (either face-to-face or by video conference/Skype) and 341 by means of online surveys. A full list of people and institutions interviewed is presented in Volume II, Annex 10. Please note, there is some overlap between the respondents to the online survey and the field interviews.

17 See project samples in Volume II, Annex 2.6.

18 AZ (Dec 2012), GE (Nov 2015), MA (Jan 2018) and TR (May 2011). In EG, the EUD and PAO carried out an assessment of Twinning projects as part of the mid-term review of the SAAP III and IV (2018).

19 DZ (Aug 2014), TN (Mar 2014) and JO (Dec 2011).

20 This was the case for the Turkish and Jordanian evaluations (2011), Twinning versus Technical Assistance (Ecorys, 2011) and the Evaluation of the Institutional Twinning Instrument in the Countries covered by the European Neighbourhood Policy (HTSPE, 2012).

circulation was only available from 2014, which reduced the scope of the analysis presented in section 5.6 regarding MS response to calls for proposals.

The response rate of project beneficiaries to the online survey was modest (273 respondents including both PC and MS Twinning partners). Given the time lapse, many of the email addresses provided by the EUDs were obsolete, especially for older projects. The evaluation team double-checked and updated whenever possible contact details, sent reminders and prolonged the duration of the survey by a month to achieve the highest response rate possible. A similar problem arose during the field phase with the beneficiaries of a few older projects not responding to the emails from the evaluation experts. To ensure that the field phase covered the number of projects agreed in the desk report, replacement projects were identified in time and agreed with the EC²¹.

The interviews held during the desk and field phases with Twinning stakeholders yielded a lot of information and provided an invaluable insight into the reality of Twinning implementation. In the context of a policy evaluation, it was crucial for the evaluators to clarify viewpoints, probe more deeply some of the issues raised in the evaluation questions and clarify the responses to the online survey. Without the possibility of complementing the desk analysis and the online survey with face-to-face interviews of a wide range of stakeholders, many of the findings of this report would have not emerged.

It is important to stress also that all projects reviewed during this evaluation were implemented under the 2009 and 2012 Twinning Manuals. As explained in our replies to the EQs, many of the shortcomings identified in the course of the evaluation regarding the design and implementation of Twinning projects are being addressed by the new Twinning Manual, which DG NEAR introduced in July 2017.

Last but not least, it is of course an implicit challenge to link changes at the sectoral level (EQs 3-5) to specific Twinning projects in complex political and economic environments.

²¹ See project sample in Volume II, Annex 3.3.

4 OVERALL FRAMEWORK OF EU SUPPORT AND ITS EVOLUTION IN THE GIVEN COUNTRY/REGION/THEMATIC AREA (INTENDED INTERVENTION LOGIC)

4.1 The origin of Twinning, its evolution and its wider context

4.1.1 *Twining - An Overview*

Twining is a form of institutional cooperation that mobilises expertise from public administrations and mandated bodies in EU Member States (EU MSs) for the benefit of non-EU partner countries (PCs)²², with the aim of sharing good practices and achieving specific mandatory results through peer-to-peer activities.

The principles of Twining²³ require that:

- **Twining is a shared commitment, not a one-way technical assistance instrument.** The partner country's administration should have sufficient staff and absorption capacity to work with a MS institution that has a similar structure and mandate, mobilise its staff, demonstrate enduring commitment and ownership, and take on board changes and best practices in a sustainable way.
- **Twining projects should be directed to achieving the mandatory results²⁴.** These are usually articulated in components and foresee a number of activities including workshops, training sessions, expert missions, study visits, internships and counselling. Twining centres on sharing of good practices and 'learning by doing'.

These distinctive features add up to a unique Twining set-up:

- It is a form of grant assistance designed solely to deliver a service (there are no supply or works components²⁵).
- As a modality rather than an instrument, Twining does not have its own EC regulation. It is governed directly by the EU's Financial Regulation (FR), and is referenced explicitly as a delivery mechanism for EU assistance in Regulation 236/2014 laying down common rules and procedures for implementing IPA II and ENI, inter alia. Hence, Twining follows management rules applying to grants funded by the EU, in line with the FR. The administrative aspects of implementation are articulated in the form of a Twining Manual (TM), which describes the institutional model, including National Contact Points, Project Leaders and Resident Twining Advisors (RTAs) providing a common programming and implementation structure for all Twining projects.
- It is applied in two political contexts, namely EU enlargement policy, which is geared towards increased democracy, rule of law and respect of fundamental rights, enhanced socio-economic development, and ultimately, preparing PCs for accession by fulfilling the Copenhagen criteria, and EU neighbourhood policy, which aims to strengthen cooperation, enable progressive economic integration between the EU and PCs, deep and sustainable democracy, and stronger partnership with societies. Twining must function within widely-differing legal and administrative cultures, and under direct or indirect management.

Throughout the period of this evaluation, 2010-2017, a distinction has been made between standard Twining and Twining light. Under the applicable TMs, Standard Twining lasted between 12 and 36 months and centred around one or more full-time Resident Twining Advisers (RTAs), seconded to the partner country administration for the entire duration of the implementation period to coordinate the project's activities. The RTAs were in turn supported by Medium-Term Experts (MTEs)²⁶ and Short-Term Experts (STEs) on mission. Under these TMs, Twining light was designed to offer a more flexible, medium-term approach and had a shorter duration of up to six months (or exceptionally, extended to eight) and involved STEs only. In both

²² The EU MSs that joined in 2004, 2007 and 2013 also benefitted from Twining under the Transition Facility, temporary post-accession financial assistance to strengthen the new Member States' administrative capacity to implement EU legislation and to encourage exchange of best practice among peers.

²³ The principles of Twining as set out in the 2012 and 2017 Twining manuals are presented in Volume II, Annex 2

²⁴ "Mandatory results are concrete operational results in connection with the Union acquis, EU standards/norms or other EU policies open for cooperation usually linked to a planned and agreed reform process in the Beneficiary country" (Twining Manual, 2017)

²⁵ Supplies/good are allowed by the TM only marginally: "The value of supplies/goods up to EUR 5 000 is eligible under the budget heading horizontal costs".

²⁶ Under TM 2017, MTEs have been replaced by Component Leaders (see TM 2017, Section 5.2.5)

cases, Twinning was overseen by two Project Leaders (PLs) one of each from the MS and PC sides. In this respect the PLs and RTAs were described by the Commission in the Twinning Manual as the “backbone” of Twinning projects.

The remainder of section 4.1 considers the contextual factors which may influence the way in which Twinning has been used by individual PCs. These are:

- **The cooperation context:** whether Twinning is employed under enlargement or neighbourhood policy, and the nature of the association, stabilisation, partnership and/or cooperation agreement that governs the relationship between the EU and the PC;
- **The funding framework:** whether Twinning is financed by IPA/IPA II (enlargement) or ENPI/ENI (neighbourhood);
- **The management mode of Twinning projects:** whether they are subject to centralised / direct or decentralised / indirect management; and
- **The political, socio-economic and fiscal context:** the exogenous factors that may have affected the needs and capacities of both PCs and EU MSs, including the potential impact of the 2007-2010 global economic and financial crisis and its aftermath, the Arab Spring, the conflict in Ukraine and other events in the region.

4.1.2 Cooperation context for Twinning

Twining was initiated by the European Commission in 1998 in an **enlargement** context, to help candidate countries to prepare for EU membership by strengthening their administrative and judicial capacity to transpose, implement and enforce the EU *acquis*, within the context of the following legal agreements:

- the Europe Agreements Establishing an Association (EAAs) signed with those candidate countries that joined in the 2004 and 2007 enlargement rounds²⁷;
- the Association Agreement (AA) with Turkey; and
- the Stabilisation and Association Agreements (SAAs) signed with the Western Balkans countries.

In this context, Twinning provides a mechanism to build long-term relationships between existing and future EU MSs.

At the end of 2003, Twinning was extended to neighbourhood countries in the South that had signed Association Agreements (AAs) with the EU, and in 2004 to the East, for countries that had concluded Partnership and Cooperation Agreements (PCAs)²⁸. In this context, Twinning aims to upgrade the capacities of the partner country’s public administration through staff training, support to reorganising structures, and assistance with approximating national laws, regulations and quality standards to those of EU Member States.

At the start of the evaluation period in 2010, 25 countries were eligible to participate in Twinning projects²⁹ as beneficiaries of the assistance. Over the period 2010-2017, one candidate country, Croatia, acceded to the EU, and henceforth participated in Twinning projects as a source of expertise for PCs.

The **EU enlargement policy framework** has remained largely constant throughout the period of the evaluation. The political, economic, and administrative & institutional capacity criteria for EU accession were defined at the 1993 European Council meeting in Copenhagen and have remained the basis for deciding whether the candidate country has met the conditions for membership throughout successive rounds of enlargement since then.

Since it was initiated in March 2003 by a Commission Communication, the **EU’s Neighbourhood Policy** (ENP) has been founded on a partnership approach of greater political cooperation and closer economic integration, underpinned by the values of democracy, rule of law and respect of human rights, to strengthen the prosperity, stability and security of all. However, the ENP was reviewed in 2011, following the 'Arab Spring' uprisings, which led to three innovations:

²⁷ Except Cyprus and Malta, which signed AAs

²⁸ See Volume, II Annex 2 for further details of EU relationships with partner countries.

²⁹ 10 ENI South countries (no participation from Libya, Syria and the Palestinian territories), 6 ENI East countries (no participation from Belarus) and 8 IPA countries (Iceland implemented one project. Croatia became an EU Member State in 2013)

- Increased differentiation, to respect the different aspirations of PCs and better respond to the interests of both the EU and its partners;
- 'More for more', whereby additional reform efforts by PCs were to be rewarded with additional financial and other support; and
- 'Less for less', whereby the EU would downgrade relations with governments engaged in violations of human rights and democracy standards.

Given significant further developments in the Neighbourhood Policy area since this time, a further review was launched in 2015 with a public consultation, leading to a Joint Communication from the Commission³⁰. The review has highlighted four domains: good governance, democracy, rule of law and human rights; economic development for stabilisation; security; and migration and mobility.

4.1.3 Funding framework

Historically, the **funding instruments** for Twinning were as follows:

- For the enlargement countries, Twinning projects were originally financed under the PHARE programme (1998-2003), the Transition Facility for new Member States in the 2004 enlargement round (2004-2006) and, for the countries of the Western Balkans, CARDS from 2001. For the 2007-2013 financial perspective, PHARE and CARDS were integrated with other funding instruments (ISPA and SAPARD) into a single Instrument for Pre-accession Assistance (IPA). IPA was retained for 2014-2020 with some modifications in the programming and management, as 'IPA II'.
- For the neighbourhood countries, the funding vehicle was initially the MEDA programme for the Mediterranean countries in the South and TACIS for the former Soviet Union States of the East. As with IPA, these two instruments were merged into one for 2007-2013 as the European Neighbourhood Policy Instrument (ENPI), which similarly evolved into the European Neighbourhood Instrument (ENI) for 2014-2020.

The funding framework has experienced its own evolution, as the approach to programming moved to a **sector approach for enlargement countries**. Until 2010, IPA component 1 Technical assistance and institution-building (including Twinning) was programmed on an annual and project-centred basis but from 2011, the Commission moved to the sector approach (PAR, transport, agriculture and rural development, etc.). With the adoption of IPA II in 2014, the sector approach was embedded fully into the programming process for partner countries, which are now required to prepare multi-annual Sector Planning Documents, as the basis for either Sector Support Actions or Stand-alone Actions.

The transition from ENPI to ENI was accompanied by a **streamlining of the scope for assistance in neighbourhood countries** for Twinning and other modalities (including technical assistance) from 26 areas (2007-2013) to just six (2014-2020).

4.1.4 Management mode under the funding instruments

As well as the parameters of the enlargement and neighbourhood funding instruments, including the sectoral focus of programming over the evaluation period, the PCs can also be distinguished by the applicable management mode for implementing these programmes, specifically with respect to grant scheme management (given that Twinning is grant assistance). Where the responsibilities for calls for proposals, contracting, financial and contract management are conferred on the national authorities, these duties are performed by the Administrative Office (AO) as the contracting authority³¹.

For the enlargement countries, preparation for accession also meant developing their administrative capacity to programme and implement EU funding, in expectation of managing the EU cohesion policy instruments, namely Structural Funds and the Cohesion Fund. The process of transition to EU standards enabled enlargement countries to take on greater responsibility for tendering, contracting and payment once they had demonstrated the systems and staffing were in place to do so. The default position is 'centralised management' (IPA) or 'direct management' (IPA II), whereby the EU Delegation (EUD) is responsible for procurement of

³⁰ Joint Communication to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions, Review of the European Neighbourhood Policy, SWD (2015) 500 final

³¹ From 2009 TM: "The administrative office (AO) is a body within the administration of the beneficiary country, which has been designated to retain the overall procedural, financial and contractual management of the Twinning projects. The actual scope of its responsibilities varies depending upon the geographical area and the applicable management system (See also PAO for ENPI Countries)."

works, services and/or supplies, grant calls for proposals, contracting and finance. When the Commission is satisfied that the designated national authorities have the required structures, systems and staff in place, the PC can move, to ‘decentralised management’ (IPA) or ‘indirect management’ (IPA II), in which accredited public bodies take on these responsibilities (‘conferral of management powers’), either with ex ante or ex post approvals by the EUD, depending on the assessment of readiness. Under decentralised / indirect management, the AO that is accredited with responsibility is known by the collective title ‘Central Finance and Contracting Entity’ (CFCE). For enlargement countries operating under indirect management in the 2014-2020 financial perspective, the Commission makes an annual review to confirm that the PC can be entrusted with management powers for the whole or part of the assistance programmes³².

Without the same expectation that they would graduate eventually to EU membership status (in which the mode for implementing the EU’s cohesion policy instruments is ‘shared management’), the Neighbourhood East countries operate under centralised management (ENPI) and direct management (ENI). The Neighbourhood South countries operate under decentralised management (ENPI) and indirect management (ENI), with either ex ante or ex post controls and with the European Commission, however, retaining the financial and contractual management of projects. The role of AO is taken by Programme Administration Offices (PAOs).

4.1.5 The political, socio-economic and fiscal context

Furthermore, PCs, EU MSs and EUDs have been affected over the evaluation period by the aftermath of the 2007-2010 global financial, economic and fiscal crisis, which led to many public administrations reducing their expenditure and, particularly their staffing levels³³. The EU’s public administration recorded 800,000 net job losses over 2008-2015, equivalent to around 5% of the headcount³⁴ through redundancy, (early) retirement and resignation, while many also instigated hiring freezes. In recent years, many public administrations have begun to recruit and expand their staffing again through the economic recovery, particularly in critical policy areas where demand has increased, such as migration and border management.

Moreover, the period under evaluation has been marked by radical political changes and challenges, including the Arab Spring and conflicts in Libya and Syria which fuelled an unprecedented migration crisis and the Ukrainian revolution which triggered major geo-political tensions with Russia. This has created a backdrop of social and economic turmoil (e.g. the 2014-2015 recession in Ukraine resulted in two-thirds currency devaluation) that fundamentally changed the context for public administration in affected countries.

4.2 The development of Twinning policy and guidance

To guide PCs and EU MSs through the process of preparing and implementing Twinning projects, the Commission developed a **Twining Manual (TM)** which has been regularly reviewed and revised. The common thread between all versions of the TM over 2010-2017 is that they describe the purpose and principles of Twinning and explain the practicalities of Twinning projects (from fiche preparation to project audit).

For the period of the evaluation, the first relevant iteration is the 2009 TM. Subsequent updates to the manual and its annexes were made in 2012. The templates for Twinning contracts that were presented in the 2012 TM were revised for the ‘update 2013-2014’ to align them with the new Financial Regulation (No 966/2012) based on PRAG 2013 models. These templates were revised again in 2016. The TM was subject to a rigorous review starting in 2014 and involving widespread and intensive consultation with EU MSs, EUDs and various Commission Services, as well as studies and analyses performed by DG NEAR, culminating in a new version that was published in 2017 and updated in November 2018³⁵.

As well as simplifying procedures (e.g. relating to contracting), defining unit costs and flat rates, harmonising rules and processes across IPA II and ENI, and setting out a more structured results-based approach (see section

³² The information in this paragraph and the chart below will be double-checked with the relevant ISG members and EUDs

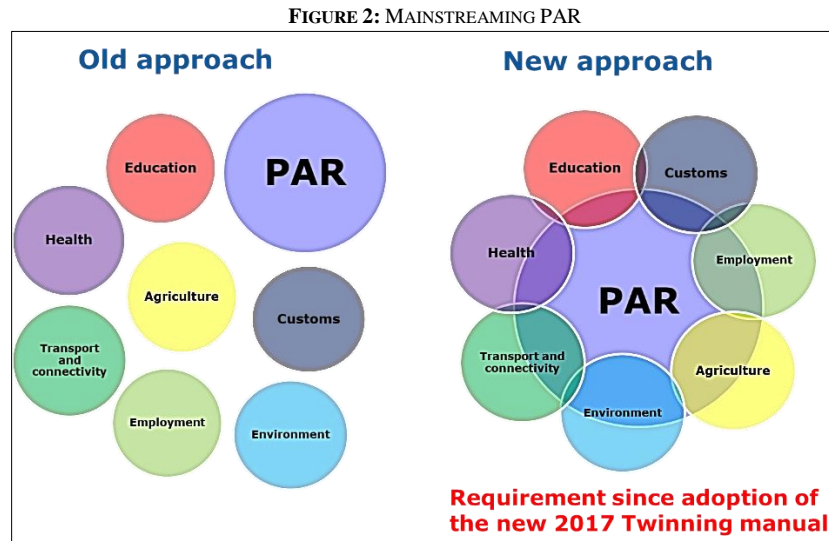
³³ See, for example, Eurofound (2015), [ERM Annual Report 2014: Restructuring in the Public Sector](#), Publications Office of the European Union, Luxembourg. The sharpest decline was seen in Latvia (-29%) but declines of more than 10% were also recorded in France and the UK. However, the pattern varied across the EU. Some countries prohibited staff lay-offs. Some, such as Hungary and Slovakia, recorded an increase in public administration jobs of over 20%.

³⁴ Eurofound’s European Restructuring Monitor recorded a sharp increase in the share of announced job loss in public administration in 2010-2011, accounting for more than a quarter of all employment cuts due to large-scale restructuring.

³⁵ The 2017 TM applies to Twinning grants awarded following calls for proposals published after 30 June 2017.

3), the latest **2017 edition** aligns the TM with DG NEAR policy developments (such as the use of Twinning’s in the design of Sector Budget Support programmes) and the ‘fundamentals first’ strategy.³⁶

In addition, the 2017 TM embeds the concept of **mainstreaming public administration reform**. This sees PAR not as a distinct sector that is separate from other fields, but instead as integral to the application of Twinning, as illustrated by the following diagram:



Source: Ms. Ritva Heikkinen, Centre of Thematic Expertise on Public Administration Reform, DG NEAR, Presentation to Institution Building Days, Brussels, 7 February 2018

This approach contrasts with the traditional view that, by building institutional capacity, Twinning automatically improves governance and contributes to PAR efforts. For example, the previous assumption was that any law drafted under Twinning must by definition be a good law that is implementable and enforceable, and any public official trained improves that organisation, even incrementally, and contributes to the strengthening of the public administration. The new perspective challenges these assumptions. For example, if the law was prepared and adopted too quickly, without proper inter-ministerial coordination, public consultation and impact assessment, it might have unexpected consequences, favour specific interests or require multiple amendments. Similarly, administrative capacity is about more than individual organisations, especially where there are overlapping or complementary responsibilities. Creating 'islands of excellence' can result in (more) fragmentation in the public administration through 'silo effect' unless it is also linked to better coordination in policy-making and implementation. Instead, the new approach places conditions on this correlation between intervention and institution-building, namely: “Twinning improves governance if it complies with key principles of public administration”.³⁷ It takes a systemic approach, based around the Principles of Public Administration that were first adopted in 2014, in six core areas: strategic framework of PAR; policy development and co-ordination; public service and human resources management; accountability; service delivery; and public finance management.

4.3 Reconstructed intervention logic

As Twinning does not have its own distinct legislation (unlike the funding instruments, IPA, IPA II, ENPI and ENI) or published strategy, the intervention logic of Twinning projects has been derived from the Twinning Manual, the Terms of Reference for the evaluation and the projects reviewed in the Twinning database.

Figure 3 overleaf shows the reconstructed intervention logic with the relationship between the inputs, activities, outputs, outcomes and impact of Twinning³⁸. The intervention logic flows from left to right in the diagram.

³⁶ Communication from The Commission to The European Parliament, The Council, The European Economic and Social Committee and The Committee of the Regions, 2016 Communication on EU Enlargement Policy, COM(2016) 715 final

³⁷ “Mainstreaming the Key Principles of Public Administration in Twinning (and other IB) projects”, presentation by Ms. Ritva Heikkinen, Centre of Thematic Expertise on PAR, DG NEAR, to the Annual Regional Conference on Institution Building, Kyiv, 7 December 2017.

³⁸ The intervention logic is the logical link between the problem that needs to be tackled (or the objective that needs to be pursued), the underlying drivers of the problem, and the available policy options (or the EU actions actually taken) to address the problem or achieve the objective. (EC Guidelines on Impact Assessment)

Inputs are used in project activities to achieve the outputs ('mandatory results') set out in the work plan in the contract. These immediate outputs from the Twinning contribute to the achievement of outcomes (sustainable benefits to the Twinning beneficiaries), which in turn feed into strategic impacts (political and economic reform, in line with PCs' agreements with the EU), in combination with other domestic and donor-funded interventions. The eventual achievement of impact will be dependent on other factors, outside the control of the Twinning project.

The **inputs** involve financial, human and material resources, in accordance with the applicable Twinning Manual. As Twinning does not have its own discrete budget, but instead is a grant mechanism for deploying resources under enlargement and neighbourhood policy instruments, the financial contribution is the total expenditure incurred on Twinning during the 2010-2017 period, both through EU and national co-financing under IPA/IPA II and ENPI/ENI. The human resource contribution takes the form of the time and expertise contributed by all partners and stakeholders. While the costs of RTAs, MTEs and STEs, and to some extent the EU MS Project Leaders (PLs) are met by the aforementioned funding instruments, other contributions are made by PC administrations (including National Contact Points and PLs), other MS staff, the European Commission and EEAS. The PC is also obliged to provide certain material resources as their contribution to the Twinning project.

These inputs are employed to carry out **activities**, in accordance with the applicable Twinning Manual, as specified in the Twinning work plan. These activities are implemented within the context and scope of eligible assistance under the relevant funding instrument, either IPA/IPA II or ENPI/ENI.

The anticipated **outputs** from these activities are laid down in the individual Twinning fiches and thereby the Twinning contracts in the form of 'mandatory results', which are by nature highly diverse given the sectoral coverage of the mechanism. These outputs / mandatory results are typically articulated as the direct consequence of the planned activities.

The outputs should contribute directly, and in combination, to attaining the expected **outcomes** from each Twinning project. Every Twinning fiche and contract (work plan) includes a project purpose (2009 and 2012 TMs) or specific objective (2017 TM), which generally equates with outcomes. Indeed, this is explicit in the 2017 TM, which refers to "specific objectives/outcomes", and describes them as "*the sustainable benefits that will be delivered to the project's target beneficiaries*" and "*the effects on the political, social, economic and environmental areas targeted by the EU intervention, as well as the changes in behaviour of beneficiaries of EU intervention*". The outcomes that arise from the Twinning projects outputs should enable the PC administration to adopt EU norms, standards and practices, *inter alia*. To reflect the EU's latest policy thinking, the outcomes in the reconstructed intervention logic are couched in the language of 'mainstreaming PAR' (see section 2.2).

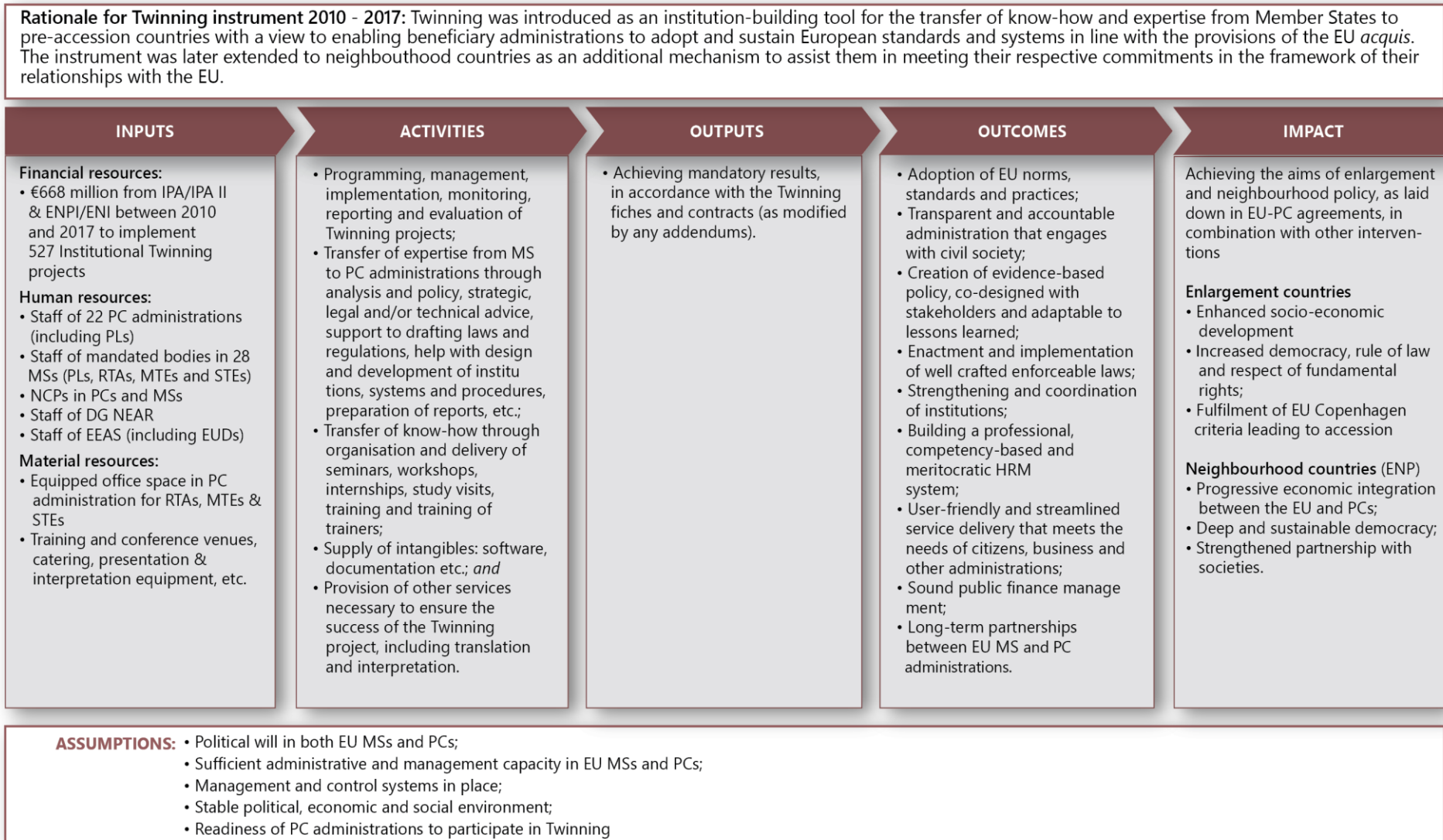
While individual Twinning projects each have their own purpose / specific objective, and hence outcomes, to which their mandatory results (outputs) are a stepping stone, the logic of Twinning as a whole should be systemic change, through the combined effects of Twinning with other reform modalities supported by the EU, other donors and national actions. Ultimately, the desired **impact** of Twinning as an institution-building tool should be revealed in achieving political and economic reform, as set out in the PCs' agreements with the EU.

According to TM 2009 and TM 2012, each Twinning project is expected to set out its overall objective beyond its immediate scope "*by referring to the longer-term benefits anticipated for direct beneficiaries, and to the wider benefits foreseen for the PC at large*" which "*will require the impact of other projects and programmes, and possibly actions by other donors as well*". The 2017 TM developed the concept further by characterising the overall objective as "*linked to the general sector reform in the beneficiary country, as agreed in the framework of the definition of cooperation with the EU. These are the changes in the political, social, economic and environmental global context which will stem from interventions of all relevant actors and stakeholders in the project. These require the involvement of third parties that were not direct beneficiaries of the intervention. Hence, changes are indirectly influenced by EU intervention*". In this context, the measures of impact in the intervention logic are defined by enlargement and neighbourhood policy objectives.

In the case of enlargement countries, the overarching goal is to fulfil the three so-called Copenhagen criteria as the key pre-condition for accession. In the case of neighbourhood countries, the goals are defined by ENP (see section 4.1), regarding closer political cooperation and economic integration with the EU, and deeper democracy and partnership with civil society, to strengthen their prosperity, stability and security. These goals

are realised through the parameters of the ENPI and ENI funding instruments and enhanced by the introduction of the Principles of PAR into TM guidance from 2015 onwards, and hence the impact of institutional Twinning in the neighbourhood will vary over time.

FIGURE 3: RECONSTRUCTED INTERVENTION LOGIC



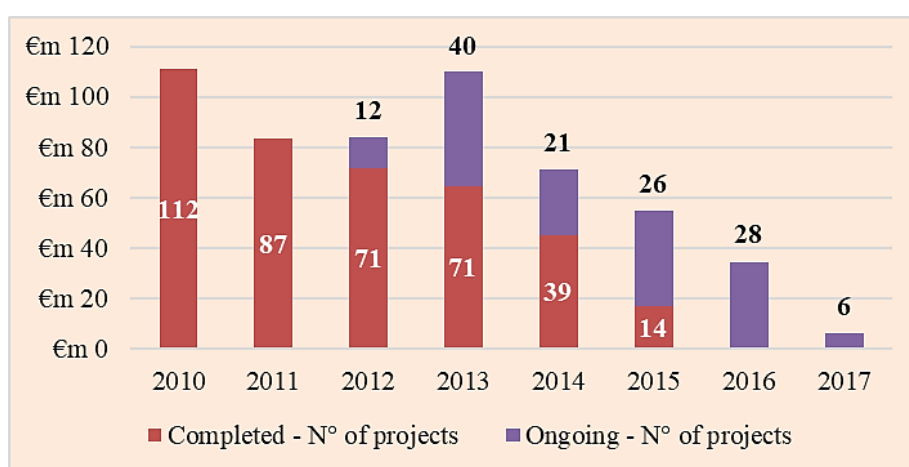
5 OVERVIEW OF REALISED INTERVENTION LOGIC (ANALYSIS OF INVENTORY OF ACTIONS)³⁹

5.1 Overview

Out of the 639 Twinning fiches circulated between 2010 and 2017, 527 projects were selected for implementation, of which 18% were Twinning light projects. The total value of implemented Twinning projects amounted to €555m over the period. The average budget was €1.2m for a standard Twinning project and €0.2m for a Twinning light project. There were only 12 standard Twinning projects with a budget above €2m.

By June 2017, the cut-off date for projects reviewed by this evaluation, 75% of projects awarded over the period had been completed and 25% were still under implementation. As shown in Figure 4 below, 12 projects funded under the 2012 allocations were still ongoing, which is an indication of the time lag between programming and implementation.

FIGURE 4: COMPLETED AND ONGOING TWINNING PROJECTS PER ALLOCATION YEAR

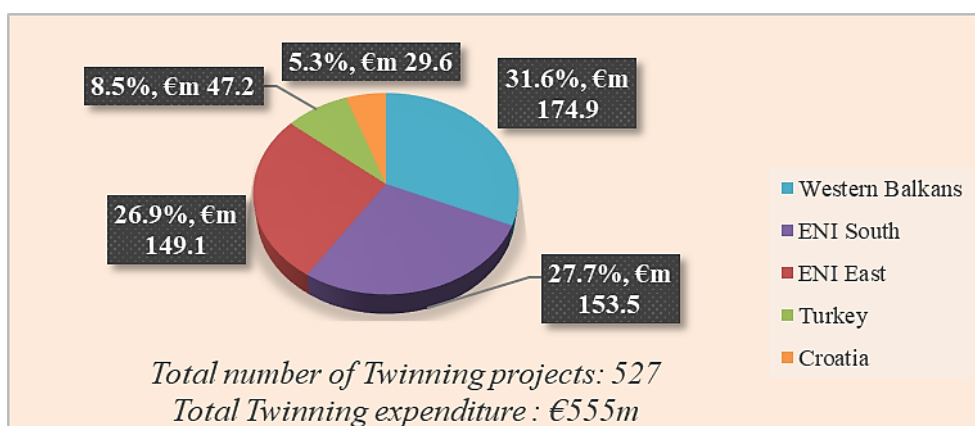


Source: DG NEAR, GDSI analysis

5.2 Geographical distribution

The geographical coverage of Twinning appears well balanced between IPA and ENI regions. Out of the 639 Twinning fiches circulated between 2010 and 2017⁴⁰, 339 originated from IPA countries and 300 from ENI countries. Looking at actual implementation, 49% of projects took place in ENI region compared to 52% in IPA countries, as shown on Figure 5. However, in terms of value, ENI projects represented 55% of the total Twinning expenditure against 45% for IPA, which indicates that ENI countries favoured larger projects.

FIGURE 5: TOTAL VALUE AND SHARE OF IMPLEMENTED PROJECTS BY AREA 2010-2017



Source: DG NEAR, GDSI analysis

³⁹ A full analysis is presented in Volume II, Section 5

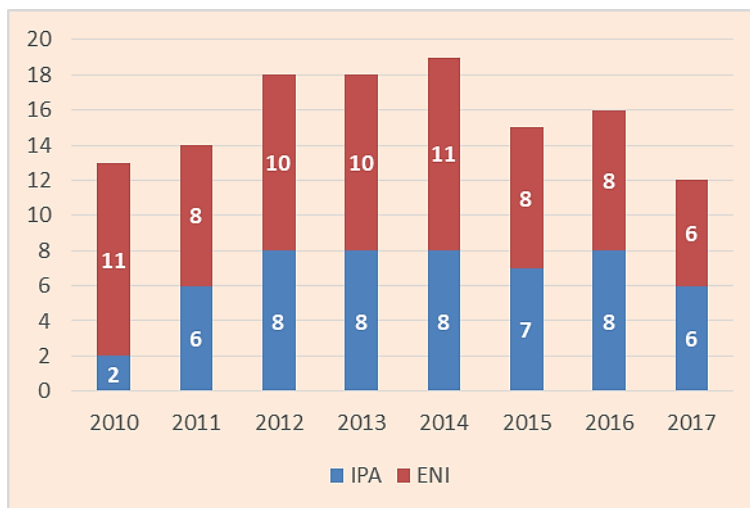
⁴⁰ The list of TPFs is available in Volume II, Annex 7

Following the accession of Croatia in 2013, the number of Twinning projects in the enlargement region dropped significantly from 75 in 2013 (Croatia: 24 projects) to 21 in 2014 (Croatia: 0 project). In contrast, it remained steady in the neighbourhood region.

5.3 Partner countries

In the years from 2014 to 2017, the number of partner countries launching a call for proposals increased until 2014 but has been declining since then as shown on Figure 6. Error! Not a valid bookmark self-reference.. Apart from 2010, most IPA countries (total: 8 countries) applied at least for one project each year. The take-up is much lower in ENI countries (total: 12 countries) in particular in recent years.

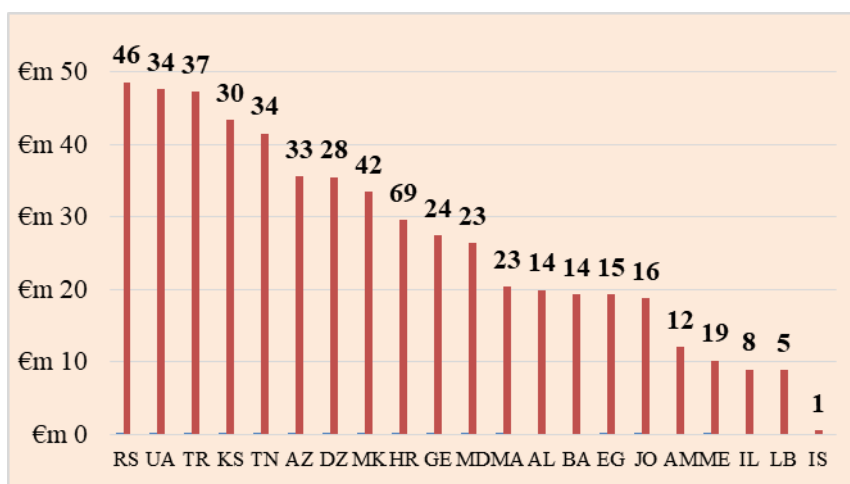
FIGURE 6 PARTNER COUNTRIES LAUNCHING CALLS FOR PROPOSALS



Source: DG NEAR, GDSI analysis

As shown on Figure 7 overleaf, the highest number of projects was recorded in Croatia (69) followed by Serbia (46), North Macedonia (42), Turkey (37) and Ukraine (34). However, in terms of project value Serbia, Ukraine and Turkey came top accounting altogether for 25% of the total Twinning expenditure, indicating a preference for larger projects in these countries. By contrast, the share of projects implemented in Israel and Lebanon was less than 2% of the total Twinning expenditure (€1.6m in each country).

FIGURE 7: VALUE AND NUMBER OF IMPLEMENTED PROJECTS BY PARTNER COUNTRIES



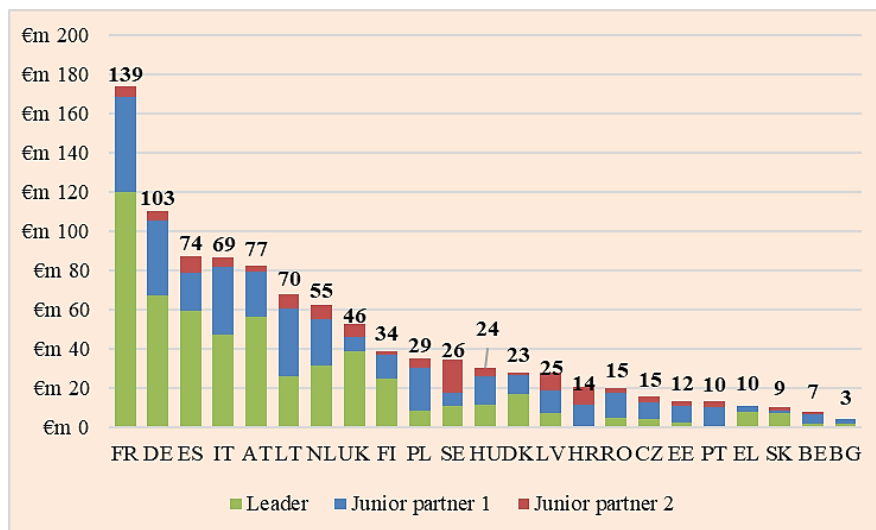
Source: DG NEAR, GDSI analysis

Until it joined the EU in July 2013, Croatia implemented the highest number of Twinning light projects (42) representing 40% of the total, highlighting the relevance of such modality in the context of accession. In contrast, only nine twinning light projects were implemented in ENI countries, of which five in Morocco, three in Tunisia and one in Moldova.

5.4 EU Member states

In total, the administrations of 24 EU MS were involved in Twinning projects over the period, either as lead or junior partner. As shown in Figure 8, larger EU MSs tend to win more projects although there are exceptions e.g. UK and Lithuania. France implemented the highest number of projects, both as lead partner (101) and junior partner (33). Germany came second both in terms of number and value of projects. Austria and Spain implemented about the same number of projects (77 and 74 respectively), but the value of Spanish projects was higher by €4m. Four EU MSs did not participate in any Twinning projects over the period (Ireland, Cyprus, Luxembourg and Malta), while Portugal participated only as a junior partner (10 projects). “Newer” MSs⁴¹ implemented 87 projects as lead partner out of a total of 527, including Croatia which implemented 14 projects since it joined the EU, of which one as lead partner.

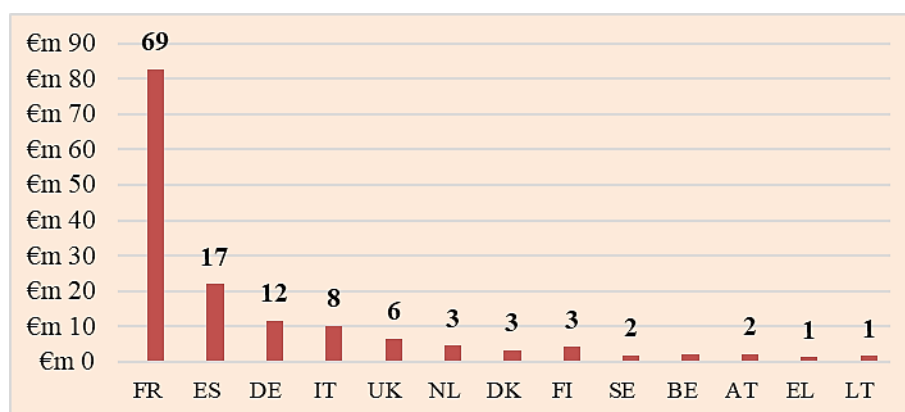
FIGURE 8: VALUE AND NUMBER OF TWINNING PROJECTS PER MS (AS LEADER AND/OR JUNIOR PARTNER ACROSS ALL COUNTRIES)



Source: DG NEAR, GDSI analysis

As shown in Figure 9, cultural and linguistic links are a strong determinant of the interest of EU MS for certain partner countries. About 69% of the total value of projects where France is lead partner are located in ENI South (compared to only 10% in Western Balkans, including Croatia).

FIGURE 9: TWINNING PROJECTS IN NEIGHBOURHOOD SOUTH (2010-2017)



Source: DG NEAR, GDSI analysis.

In contrast, Austria was principally involved in the Western Balkans/Croatia (71%) and ENI East (24%) with only limited activity in ENI South (4%).

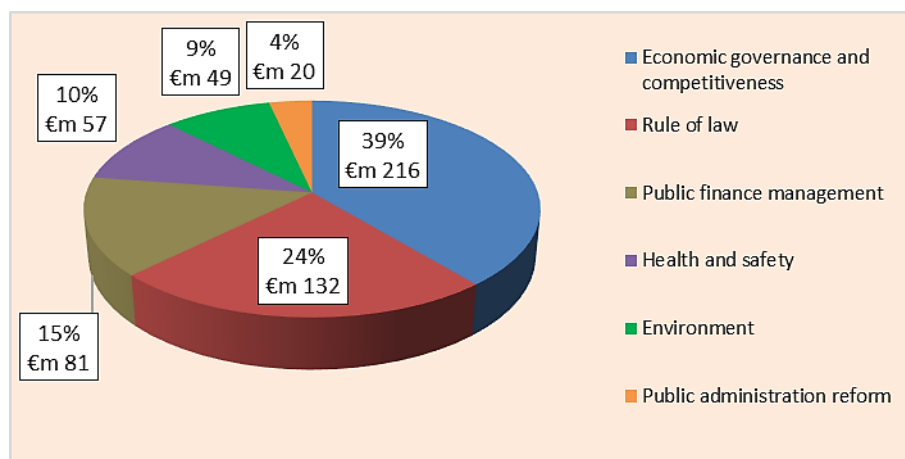
Only seven EU MSs were involved in all five regions as lead partner (DE, ES, FR, IT, LT, NL and UK). In contrast, six MSs covered one or two regions only (BE, BG, CZ, EE, HU and SI).

⁴¹ Those joining the EU from 2004 onwards;

5.5 Sectorial coverage

As shown in Figure 10, projects in the field of economic competitiveness and governance represented 39% of the total funding spent over the period followed by rule of law projects (24%) and public finance management projects (15%). This sectorial coverage reflects the priorities of EU-PC agreements. This explains why in enlargement countries rule of law and PFM represent half of the projects while 51% of projects in the Neighbourhood area are related to economic governance and competitiveness. It should be noted that the six sectors shown on Figure 10 can be broken into 39 sub-sectors, illustrating the range of topics to which Twinning was applied over the period.

FIGURE 10: TOTAL VALUE AND SHARE OF IMPLEMENTED PROJECTS PER SECTOR⁴²

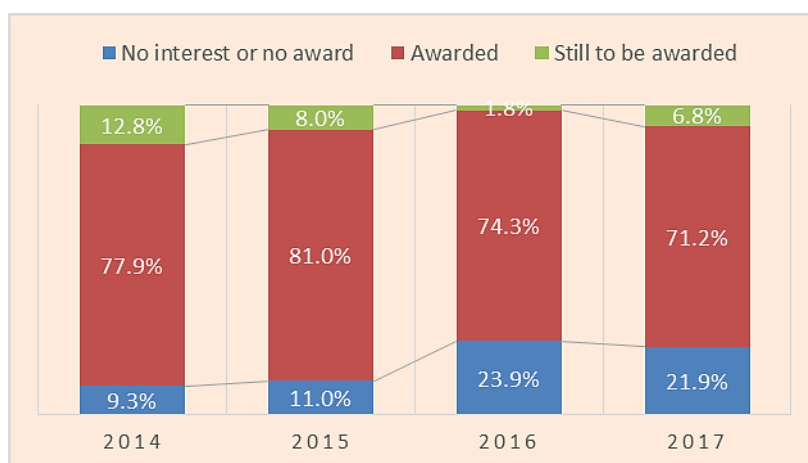


Source: DG NEAR, GDSI analysis

5.6 Response to calls for proposals

Looking at projects which were circulated but not implemented (112 out of 639 projects), there were 22 projects selected but not yet contracted and 86 projects which did not receive any proposal resulting in a re-launch (46 projects) or a cancellation (29 projects)⁴³. As shown in Figure 11, the percentage of unsuccessful calls for proposals (either no response or no award) has increased significantly in the last three years^{44 & 45}.

FIGURE 11: OUTCOME OF CALLS FOR PROPOSALS (% OF TOTAL TPFs CIRCULATED IN YEAR X)



Source: DG NEAR, GDSI analysis

The countries with the highest proportion of non-awarded projects (data 2014-2017) are Turkey, Croatia and Kosovo as shown in Figure 12:

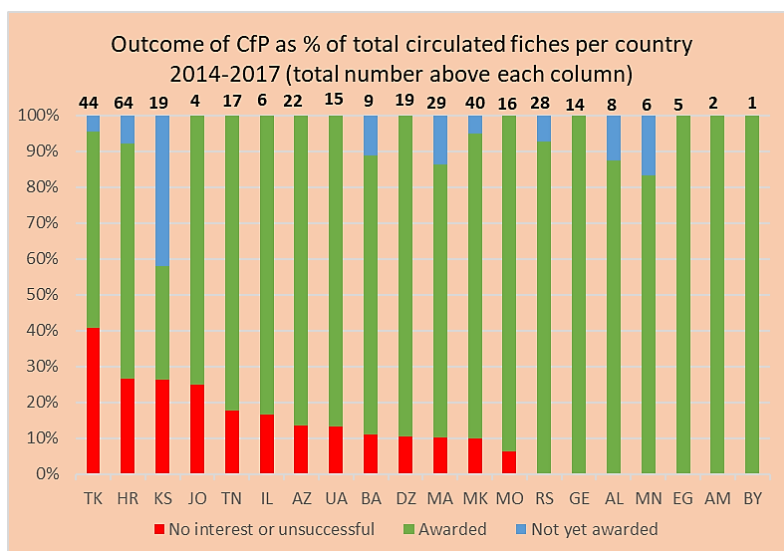
⁴² Public administration reform does not include PFM projects which are shown separately in the chart.

⁴³ 11 projects unsuccessfully circulated in 2017 had not yet been re-launched. The database also contains several projects whose status is unclear. Detailed figures regarding circulation of TPFs are available from 2014 onwards.

⁴⁴ Figures for 2017 run only until October. Data prior to 2014 not available.

⁴⁵ The reasons for the diminishing take-up are discussed in Section 6.1 EQ 1 and in Conclusion 3 (see matrix of factors).

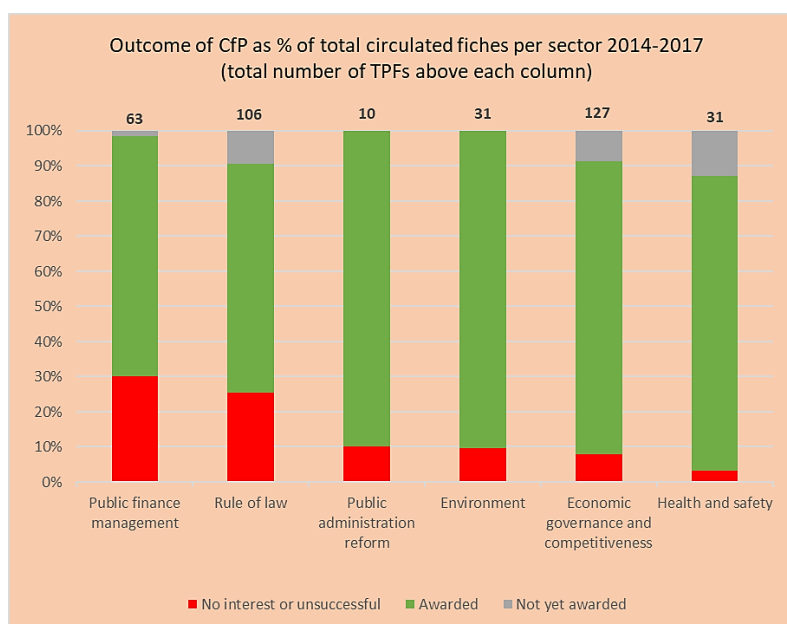
FIGURE 12: OUTCOME OF CALLS FOR PROPOSALS



Source: DG NEAR, GDSI analysis

PFM and RoL recorded the highest rate of non-awarded projects (data 201720147-2017) as shown in Figure 13 below:

FIGURE 13: OUTCOME OF CALLS FOR PROPOSALS PER SECTOR

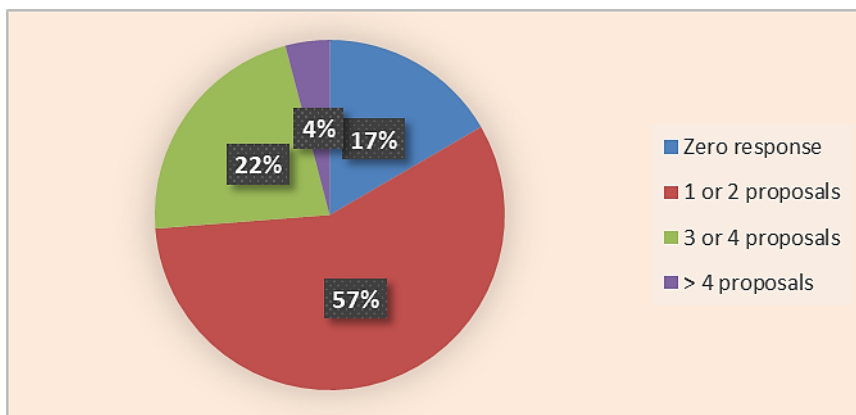


Source: DG NEAR, GDSI analysis

Looking at the number of proposals submitted in response to each call, figures for the years 2014-2017⁴⁶ show that 17% of calls for proposals did not generate any response while 52% only generated one or two proposals.

⁴⁶ Data not available for years before 2014. Projects not yet awarded are not included.

FIGURE 14: EU MS RESPONSE TO CALLS FOR PROPOSALS (2014-2017)



Source: DG NEAR, GDSI analysis

It is also interesting to note that over the same period, 51% of projects consisted of single-MS proposal.

6 ANSWERS TO THE EVALUATION QUESTIONS

6.1 Transversal evaluation questions

EQ 1 - *Regulatory framework, institutional set-up, programming approach and other conditions of implementation*

To what extent, and how, have the regulatory and institutional set-up, programming approach and implementation procedures of Twinning influenced the capacity of Twinning projects to generate the expected (mandatory) outputs and contribute to the achievement of outcomes and impacts? What other factors – organisational, human, technical or financial – have influenced the performance of Twinning? Have the changes introduced in this overall set up and approach over time been beneficial? Were they sufficient to enhance Twinning as an institutional-building tool?

Overall, the regulatory framework and institutional set-up provided a solid basis for the implementation of Twinning as an institution-building tool to support partner countries' reforms in line with EU-PC agreements

The Twinning regulatory framework and institutional set-up proved to be robust as testified by the range and achievements of projects funded over the 2010-2017 period⁴⁷. Most of the TPs reviewed during the evaluation were instrumental in strengthening institutional capacities and contributed in varying degrees to PCs' reforms (See Volume II, Annex 6 Review of desk sample and Annex 8 Case studies).

After the project, the staff had a better understanding of their duties and scope of work, becoming more realistic about what the Anti-Corruption Commission (ACC) can achieve. Thanks to standard operational procedures, the work of technical people became more organised and systematic and the efficiency of activities were enhanced. The TP also helped the management clarify priorities and actions for developing and strengthening the ACC. (Case study, Twinning and anti-corruption policies in Jordan).

In the best cases, projects induced deeper changes in organisational practices and behaviour beyond the mandatory results.

“Definitely, this Twinning is spoken also in terms of the behavioural change that it has engendered. Changes in organisational practices and culture, improvements in managerial styles, better communication and coordination between and within BC (beneficiary country) authorities, all of these are put forward as valuable by-products of the process of MS civil servants working closely alongside BC counterparts. These “unseen” benefits are multifarious and range from simple instances to more macro-level benefits such as a realisation that better inter-ministerial and inter-agency coordination is a vital necessity for progressing on implementation of the acquis and EU best practice, especially in this area” (TRM, MD/13/ENP/OT/15, Organization, Streamlining and Computerization Process in Mapping in the Republic of Moldova)

Most partner countries' stakeholders interviewed during the desk and field phases emphasised the importance of Twinning as a capacity-building tool, highlighting the unique contribution Twinning can make to reform processes when the right conditions are fulfilled i.e. when well-identified needs on the partner country's side are matched with relevant and high-quality expertise from MSs and there is a high degree of commitment on both sides to reach well-defined mandatory results.

Twinning proved suitable to both IPA and ENI very different contexts

As the use of Twinning in IPA countries is largely driven by the accession process, which dictates the scope and pace of legislative approximation, the outputs and outcomes of Twinning projects tend to be more measurable and visible as milestones towards acquis harmonisation, achievement of Copenhagen criteria and successes in chapter negotiations. This is clear also from the take-up of Twinning light projects, which were mostly implemented in the enlargement region, as a tool to speed up the alignment with the EU acquis. By contrast, partner countries in the Neighbourhood

⁴⁷ See below EQ 3-5 and Volume II, Annex 5 Review of desk sample and Annex 6 Case Studies

do not seek to align their entire legislation, standards and norms with the EU but simply to bring them closer according to their own needs, with no binding calendar and with less pressure to ensure enforcement. In this context, the alignment with EU legislation, standards and norms is often seen as a means to pursue national reform goals (as recognised in the EU agreements), in particular by improving public governance or ensuring access to EU markets.

While the regulatory framework was clearly laid down in the Twinning Manual (TM), many stakeholders complained about the complexity and insufficient flexibility of implementation rules and procedures, which the new TM introduced in 2017 seeks to address.

The administrative aspects of implementation are articulated in the form of a Twinning Manual (TM), which describes the institutional model, including National Contact Points, Project Leaders and, in the case of standard Twinning, Resident Twinning Advisors (RTAs), and provides a common programming and implementation structure for all Twinning projects. While they appreciated this framework, many stakeholders also complained that the performance of Twinning projects was undermined by often burdensome and inflexible rules and procedures.

DG NEAR introduced a new TM in July 2017 after a comprehensive review and widespread consultation (2014-2017). TM 2017 represents the most important effort to consolidate and adapt Twinning to an evolving environment for the last ten years. The reform clarified the regulatory and institutional set up, simplifying and harmonising implementation rules and approaches across ENI and IPA countries, increasing the flexibility and speed of procedures, and putting more emphasis on impact and sustainability, in particular through a more vigorous promotion of public administration principles to ensure that projects are better integrated in the overall reform framework of partner countries. Under the new rules, TPFs place more emphasis on the mandatory results and less on the activities. This effectively gives MS more scope to focus their proposals on the methodology, administrative model and added value. As a result, MS proposals are likely to be more different from each other, allowing for a real choice by the PCs. It also addresses a concern often voiced by MS that they are not sufficiently involved in the design of projects.

TM 2017 should simplify the implementation of projects. In particular, the extension of the use of simplified cost options should reduce the need for cumbersome book-keeping and auditing, the new procedures will speed up the selection and contracting stages, and flexibility will be enhanced with the six-month rolling work plans. Most stakeholders welcomed the reform of the TM although some reservations were expressed concerning specific innovations (e.g. the single flat-rate for expert fees or the inability for PCs to detail project activities in the TPFs). Interviewed stakeholders acknowledged that the implications of the new Manual are not yet fully clear, since the new rules apply only since July 2017 and have not yet been tested in all the implementation phases. Over two-thirds of both PC and MS administration respondents to the online survey stated that they had not used the 2017 Twinning Manual. Similarly, EUDs and NCPs did not have much experience with it either. There was a universal demand for additional training courses and information on the TM to adapt to new requirements (e.g. PA principles) and avoid conflicting interpretation of rules.

The level of consultation at the design stage was not always sufficiently wide-ranging, which was identified later on as the source of implementation issues and/or reduced impact

Although 60% of respondents to the online survey considered that there was sufficient involvement of partner country's stakeholders at design stage to ensure the quality of the project, the desk review and field interviews revealed that some of the implementation issues experienced by projects sometimes originated in the lack of consultations at design stage.

The TFR notes that the Ministry of Finance "did not play any role in the design or implementation of the project", despite the beneficiary administration being "totally dependent" on its decision-making, which was clearly to the detriment of some outcomes. (Desk review)

"The lack of involvement and sufficient awareness among stakeholders were a great weakness within this project - from the beginning to the end". (Online survey)

At present, a TP is the result of a dialogue during programming that is officially conducted between the PC and the EU institutions, including DG NEAR, EU Delegations and, to a lesser degree, line DGs. There appears to be limited scope for the latter to influence the key parameters of TPFs, which reach them very late in the design process.

Many MSs consider the involvement of their administrations at design stage insufficient. The new TM gives them more scope in defining activities

Some EU NCPs and EU MS administrations consider that EU MSs are not sufficiently involved in the design of TPs, especially when the project deals with policy areas that are solely within MS' competence, rather than the EU's. MS administrations identified TPFs which had misunderstood the concepts on which they were seeking acceptance and were faced with a 'take it or leave it' choice regarding whether to respond to the call for proposals.

"We often received requests that relate to EU acquis under shared competences. A recently circulated Twinning fiche related to terrorism and radicalisation in prisons pertains to the Common European Security Policy, where competences are shared between Member States and the EU, as is often the case with justice and home affairs matters. Early consultations of Member State administrations on such sensitive topics would increase interest and enhance the feasibility of projects" (Interview, NCP)

According to some MS stakeholders, the current set-up prevents PCs from benefiting from EU MS' expertise to rectify potential design flaws in the TPF, which are difficult to address later on, and to suggest more suitable approaches⁴⁸.

"Policy expertise was not sufficiently involved in the design of the Twinning project. The Twinning fiche was not clear about the context, terminology, etc." (Interview, MS Project Leader)

There is a counter-argument that EU MSs are, in fact, consulted – via their embassies - on the main parameters of TPFs during the programming process and have therefore a chance to exert some influence on the design of projects. Moreover, the new emphasis on mandatory results⁴⁹ introduced by the 2017 TM means that TFPs are only specifying outputs, giving more scope to the EU MS to define the approach and the activities as part of the selection and contracting processes. However, it appears that at least some PCs are concerned that, as they can no longer prescribe activities in the TPF for each mandatory result, they are losing control over the project in its earliest stages. This raises questions regarding the understanding of result-based projects based on mutual trust and long-term partnership and cooperation.

While TPFs provide usually comprehensive analyses of needs and challenges, there were many examples of weakly identified result chains and mandatory results, with similarly broad objectively verifiable indicators and benchmarks

Looking at the documentation of sampled projects, the evaluation found that many TPFs were based on a weak intervention logic. This includes: specific objectives that mirror the language of the overall objective (rather than reflecting the direct and indirect influence respectively of the intervention); mandatory results that do not correspond with the specific objective (outcome) and/or overall objective (impact); and/or indicators that were broad, vague or unrelated to the mandatory results.

The mandatory results - divided into three results / components - are coherent with each other and logical in their own terms. However, they concern capacity development for implementation and enforcement, whereas both the overall and specific objective specifically refer to harmonisation of the regulatory framework with EU standards, and hence they do not reflect the full scope of the purpose and objective. The ROM report finds that: "While the intervention logic is clear in context, it needs simplification and reformulation of the mandatory results, to reflect

⁴⁸ Even though MS are formally excluded from TPF preparation, according to the TM, the online survey found that almost three-quarters of respondents (73%) either agreed or strongly agreed that MS has sufficient involvement at design stage to ensure the quality of the project. This suggests either a misinterpretation of the question (which is indicated by some of the 'free text' responses), or they felt 'no involvement' was sufficient.

⁴⁹ TM 2017 defines "mandatory results" clearly as equivalent to "outputs", and presents the expected intervention logic from mandatory results to outcomes (at the level of specific objectives) and impact (at the level of overall objective) in the TM's Annex C1a.

the end-results, i.e. the adoption of the standards, and of the benchmarks, to clearly reflect the deliverables of the project. The design shows a number of weaknesses and the intervention seemingly underestimated several risks (bureaucratic processes and need for induction period) and did not fully take into account the needs for legal and technical translations. (Desk review)

There is limited evidence of rigorous analyses of administrative capacities of beneficiary institutions at design stage, including for projects with significant capacity-building components

PC beneficiary institutions rarely carried out an assessment of their own capacity to act as counterparts for the Twinning and sustain the mandatory results as part of the design stage, although this is crucial to ensure that projects are complying with the Twinning principles highlighted in the TM (see section 4.1.1). A few final reports explained implementation issues and/or weak impact and sustainability by referring to the insufficient consideration that was given to absorption capacities and the level of resources that PC administration were able to commit to TPFs.

It should be noted that none of the TPFs reviewed by the evaluation were drafted under the TM 2017, which includes clearer guidance on the intervention logic and revised templates⁵⁰ drawing on DG NEAR working documents on setting measurable indicators. In recent years, the EC has also increased its oversight of the Twinning design process, notably through the Centres of Thematic Expertise (CoTEs), which check whether TPFs comply with strategic EU orientations in given sectors. All these changes should contribute to better designed project fiches and hence, better projects, *ceteris paribus*.

Historic, linguistic and geographic factors played an important role in the selection of Twinning partners and often explained the limited interest of Member states administrations in calls for proposals

Once the TPF is prepared and circulated (via NCPs), the process of Twinning has two aspects: MS must be willing to submit proposals, and PCs must be satisfied to select them. A review of the statistics indicates that MSs engagement tends to reflect historic, linguistic and cultural links (e.g. France with the Maghreb countries and Austria with the Western Balkans) and geographical proximity (e.g. Poland and Lithuania with Neighbourhood East, and Italy with the Western Balkans).

In the Western Balkans (including Croatia), projects led by Austria, Italy and Germany represented 40% of the total (93 projects out of 235; €91m) with Austria implementing almost half of them (42 projects; €40m). The correlation is also visible in the neighbourhood south region (see above section 5.4).

MS can also be motivated to respond to a call for proposals in certain fields in which they feel that have strengths and a ‘specialisation’. In some countries, the centre of government / NCP takes a strategic approach to extend the country’s Twinning coverage or encouraging administrations to apply for TPs in line with high-level decisions regarding strategic interests. These include Lithuania, which is increasingly looking to extend its Twinning coverage including Neighbourhood South, and Spain, where the NCP is encouraging administrations to apply for TPs in line with high-level decisions regarding strategic interests.

“Hungary has developed capacities in strengthening the role and functions of Parliament in the EU accession process. To date we have implemented seven projects in the Western Balkans because we know how to do it and we understand the needs of our partners, which are also our neighbours with a similar and often shared history” (Interview, EU MS stakeholder).

“We are aware that Denmark is very strong in statistics. They have a long experience of Twinning projects in that field, and unless we can join them, we don’t bother applying” (Interview, EU MS stakeholders)

Interviewees reported that it was difficult for outsiders to compete against countries with strong links with the PC issuing the TPF or with a strong track record of projects in a particular field. While, in theory, calls for proposals are open to all EU MS’ administrations, in reality only a few countries apply each time, with rarely more than two or three countries submitting a proposal in the best cases. Many PC

⁵⁰ Twinning Manual Annexes C1 and C1a

administrations complained that sometimes they are forced to opt for the only available proposal, so as not to risk losing the project. In other cases, they were content with the sole bid they received, but had no wider frame of reference for the choice, given the absence of interested member states administrations.

The ability of MSs to propose original activities and/or approaches in their offer was limited due to very prescriptive TPFs under the old TMs. This has been rectified under the new TM.

Prior to the introduction of TM 2017, the highly prescriptive TPF template left limited room for EU MSs to propose original solutions and differentiate from other applicants, given that both the mandatory results and the activities were pre-determined. When organised, interviews sometimes helped PCs decide between competing offers.

The call for proposals drew responses from two consortiums. Both on paper were good quality, addressed all needs, so it went to the decision at interview. The crucial difference was the RTA, they saw “super energy, very prepared, knew what we needed, knew about the law. It was also her first experience of Twinning”, which seems to have brought additional enthusiasm and commitment. The other candidate, by contrast, talked more about the home institution than the host. In the view of the beneficiary administration, the RTA is “very important – the spine” of the Twinning project. (Interview, PC administration)

It should be noted that the proposal’s originality and its relevance and suitability to the PC’s needs is likely to assume more importance in future selection processes, since TM 2017 requires MSs to describe the approach and added value of their proposals in greater length, including examples of activities, giving more substance to PCs on which to base their choices.

Partner country administrations did not always have the necessary knowledge to make an informed decision while selecting Twinning partners

Moreover, in some cases, PCs found it difficult to decide between different EU MS systems/models about which they knew little and lacked information about the most relevant EU experience for their needs.

“The most important for us when we selected the proposal was the proximity of the Member State with our own administrative system. This is why we selected [EU MS]. We are not sufficiently aware of how other administrations function”. (Interview, PC counterpart)

“We are not aware which countries in the EU have the best track record in implementing the EU acquis in our field and the systems that are best suited to ours. We would welcome this kind of information”. (Interview, PC counterpart)

“We would like to know which EU country recently transposed the directive we plan to adopt ourselves, which countries are most advanced in complying with the EU acquis in a given field. This would help us decide which partners is the best for us, and it is also important for selecting the destination of our study visits”. (Interview, PC counterpart)

Despite the wider range of experience and expertise they afford, less than half of the projects were consortium-based.

A further finding is that there was an almost equal number of consortium-based and single-MS projects. While consortium-based projects appear more demanding from an administrative point of view, they can also be more rewarding for the PCs - as they can access a wider range of expertise and experience through a single project - but also for the EU MS involved, especially when their resources and know-how are complementary, enabling them to respond better to the needs of their partner(s). There is evidence that PC administrations generally favour consortium-based TPs, in particular those combining the experience and expertise of older and newer MSs⁵¹. More and more projects utilise public officials from other than those involved in the Twinning partnership.

⁵¹ For PCs, they can enjoy the benefits of an EU MS with a common legal and administrative culture, possibly a shared history, a similar context (e.g. as members of the former Soviet Union, or economies in transition seeking accession to the EU) or the same language family, allied to another EU MS which brings a different perspective

Twinning projects were overall well managed with a majority of reviewed projects reaching their mandatory results.

Twinning projects appear to have been generally well managed with most projects reviewed during the desk and field phases reaching the mandatory results that were defined in their TPFs, either fully or partly. ROM reports also paint a positive picture of overall high levels of efficiency and effectiveness during implementation (See Volume II, Annex 4, Finding F43). Unsurprisingly, Twinning partners responding to the online survey shared this assessment, with over 80% of both PC and MS administration respondents agreeing that all the mandatory results of their project were achieved⁵².

Shortcomings in performance frameworks and M&E practices mean that it is often difficult to assess the performance of projects with accuracy.

However, as already noted, mandatory results are often formulated in broad and generic terms, and lack reliable indicators of achievements. In this context, there is a lack of hard evidence regarding the performance of projects beyond the production of outputs, and hence, it is difficult to assess with any accuracy their impact (see also EQs 3-5). Moreover, it should be noted that external monitoring and evaluation mechanisms appear to have been insufficiently used to draw lessons and enhance outcomes and impact of Twinning projects. Out of 36 sampled projects, just 13 were subjected to ROM and none to TRM. Between 2012 and 2017, just 57 TRMs were organised with the support of TAIEX. This represents a small proportion of projects implemented over the period. The new TM makes it mandatory to conduct a TRM upon project completion.

Twinning partners acknowledged the pivotal role played by the RTA in ensuring the smooth implementation of activities

Most stakeholders stress the importance played by the RTA in the success of the project. The RTAs are the main interface with the PC during standard Twinning projects. Experience from successful projects visited during the field phase show that the RTAs' and MS experts' commitment to the TP and their ability to build and maintain trust is essential, as well as an understanding of the PC administration's needs and constraints, and the overall country context. Most stakeholders interviewed in partner countries stressed that RTAs need the skills, knowledge and aptitude to manage the project, lead the STEs, provide expertise and communicate with counterparts from a different administrative context and culture. There are many examples of RTAs displaying the right competences and skills necessary for strong partnerships, but also some examples where there have been conflicts between the MS and PC sides.

It should be noted that projects often leave little room for the advisory role of the RTAs whose time is usually taken up by managerial and facilitating tasks. As a result, some PC administrations tend to look down on the RTA because of his/her daily involvement in Twinning activities.

“We were very happy with our RTA. His technical knowledge benefited tremendously our institution and we developed a strong relationship, which still lasts”. (Interview, PC counterpart)

“There was a high degree of involvement from the Project Leader, who even took part in the implementation of some project activities. The RTA was a seasoned project manager with previous experience in the region. This contributed to the high level of trust and understanding, which benefitted the project”. (Interview, PC counterpart)

“We are having difficulty to cooperate with our partner. The RTA does not inform us on time of the activities to be implemented and we have difficulty in mobilising staff. He is not aware how our administration works. This is a major problem for the project.” (Interview, PC counterpart)

⁵² There was less agreement about the impact of projects. Less than 50% of the MS respondents agreed that the recommendations from the Final Report were acted upon, compared to over 70% of PC respondents. Only 65% of MS respondents believed that the results were sustainable, compared to 85% of PC respondents.

“Our RTA is more an assistant than an advisor. She is doing a good job organising the activities, but we don’t need her to give us strategic advice”. (Interview, PC counterpart)

There were occasional negative feedbacks about the performance of some STEs and the quality of reporting by RTAs.

“We had to reject several times the progress reports submitted by the Twinning project. Some STEs performed poorly. It is more difficult to address these issues under a Twinning project. Replacement of experts are not as easy on a Twinning Project as it is on a TA contract”. (Interview, EUD)

“We have been disappointed with the quality of some STEs. Asking for their replacement always causes delays and can endanger the successful completion of activities”. (Interview, PC counterpart)

Successful Twinning projects required beneficiary institutions to have achieved a sufficient level of maturity

The success of Twinning equally depends on the capacity of PC administrations to mobilise their resources, cooperate and absorb the outputs from the TP within their structures and systems. This involves a combination of factors including staff readiness, motivation, experience and authority in decision-making. Several ROM and/or TFR reports highlighted occurrences of weak capacities affecting project performance.

“[PC administration] was ready for the project and they wanted it. There were capacity constraints, but they didn’t affect the Twinning. The partners were available when they were needed. We had a precise schedule and met [PC official] during every mission. He found time to mobilise people. There was a culture of public service. (Interview, MS)”

Country evaluations, project documentation, the online survey and interviews with Twinning beneficiaries have also highlighted various implementation challenges, including:

- Long timespan between needs identification and start of implementation affecting project relevance⁵³;
- Insufficient or over-ambitious planning;
- Inflexibility of partners;
- Sometimes frequent changes in staff;
- Not enough flexibility in adding or cancelling activities as circumstances change, in order to avoid over-lapping and/or similar activities;
- Constraints in reallocating budget items;
- Time-consuming identification and approval of STEs;
- Lack of preparedness of STEs curtailing the effective duration of missions;
- Language issues, including limits on translation and interpretation.

The pace of project implementation was often hectic with Twinning beneficiaries often complaining that too many activities are being crammed into a short period of time.

Because of heavy workloads, the beneficiary administrations had often difficulty to absorb the expertise received and/or adopt project recommendations. On the other hand, Twinning partners often find the implementation period too short when set against the long timescale required for reforms, which is sometimes underestimated at the TP design stage.

“Twinning activities eat up about three weeks of the month. There is very little time left to do our regular job. We can’t wait for the project to end because this is very demanding for the staff” (Interview, Twinning counterparts)

⁵³ A delaying factor is related to the signing of financing decision/agreement, which is often lengthy both from the Commission and PC’s side.

“Instead of building capacities, many projects saturate them. Why not envisage longer projects with a more flexible use of EU experts? It is not necessary to have an RTA full-time throughout the whole duration” (Interview PC NCP)

TM 2017 puts greater emphasis on the need for projects to be well sequenced and embedded into reform processes, notably by adhering to the principles of public administration.

While a proactive NCP is essential to generate interest in Twinning, guidance from the EUD is considered paramount during and beyond implementation.

The evaluation confirmed that a dedicated and pro-active NCP is essential for generating and maintaining interest for Twinning across the PC and EU administrations. Support from the EC (and in particular the EUDs) during project implementation is essential both from a management and a strategic point of view, as acknowledged by Twinning partners. The EUD is often the first contact point for RTAs in partner countries. EUD programme managers ensure that projects achieve and sustain the mandatory results/outputs. TM 2017 emphasises further the importance of the EC for project implementation, in particular by describing the role of the EUD in greater detail under each management mode.

Projects under indirect management were often more complex to implement

The evaluation found that implementation under indirect management tended to be more complex and burdensome, with contracting authorities of partner countries sometimes excessively procedural, reflecting their anxiety in managing EU funds under the supervision of EUDs. This created often tensions with EU MS administrations, dampening in some cases the latter’s interest in the Twinning mechanism.

In some cases, the division of responsibilities between the EUD and the contracting authority in the PC was not clear leading to conflicting interpretation of rules and/or delays in approval processes, which were detrimental to projects.

Irrespective of the management mode, the communication of TPs was often inexistent outside the kick-off and final events with insufficient acknowledgement of EU contribution.

Statistics show a relative decline in the uptake of Twinning in recent years with fewer TPFs being circulated and fewer MSs responding to calls. A variety of factors are behind this trend.

Of the 343 TPFs circulated in 2014-2017, 17% did not generate any response, and almost half resulted in 0-1 proposal being submitted (49%), while 52% only generated one or two proposals⁵⁴. As such, the failure of CfPs is becoming more common (see Figure 11 in section 5.6 above).

Excluding Croatia, which joined the EU in 2013, the number of PCs launching CfPs has fallen from 18 (2014) to just 13 (2017) of the 24 eligible enlargement and neighbourhood countries. Given Twinning is potentially applicable as a delivery modality in most sectors covered by IPA II and ENI funding, it is surprising that not all PCs have at least one TP every year.

Although this is not apparent from the online survey, which does not signal any decrease in the interest of respondents (see Volume II, Annex 7), interviews with Twinning stakeholders confirmed that there were fewer TPFs circulated and fewer proposals submitted by MS than previous years.

“There has been a general decline in interest amongst Member State institutions in Twinning as a whole. The number of applications received for individual Twinning projects keeps going down”. (Interview, PC NCP)

“The interest of Member States has been going down dramatically. While in the past we used to receive 5 or 6 proposals, nowadays it is more one or two in the best cases”. (Interview, CFCE)

The explanatory and contributory factors of this trend were queried during the desk and field phases. They can be divided into those that are internal and external to Twinning, and also those that are endogenous (within the European Commission’s

⁵⁴ Data from pre-2014 is not available, but the circulated fiches include TPs from the 2010-2013 allocation years.

sphere of influence, by changing the regulatory framework and institutional set-up) and those that are exogenous (either within the sphere of influence of EU MS and PCs, or outside the control of all the partners).

FIGURE 15: EXPLANATORY AND CONTRIBUTORY FACTORS FOR LOWER TWINNING TAKE-UP

	ENDOGENOUS (within EU's sphere of influence)	EXOGENOUS (outside EU's sphere of influence)
Internal (to Twinning)	<ul style="list-style-type: none"> -Limited timescales and fixed budgets (no scope for cost extension) leading to 'intensive' TPs Flat-rate fees below cost-recovery levels for some MS administrations Poorly designed TPFs (too many results / components / activities, insufficient understanding of EU acquis, standards or norms / MS competences) Prescription of activities in TPF (pre-2017) Inability to recover certain cost categories (e.g. in-country travel, foreign travel other than flights, catering for workshops) No detailed feedback on why EU MS proposals are rejected Deteriorating MS perception of risk-reward based on unavoidable upfront costs (time & resources taken to bid for Twinning versus likelihood and benefits of being selected) Over-strict and inconsistent interpretation of TM rules by and across (different) contracting authorities, especially under decentralised / indirect management 	<ul style="list-style-type: none"> EU MS laws, rules and systems that prevent or constrain public officials from participating in Twinning Near-monopoly positions taken by some MS administrations in individual countries and sub-sectors as 'repeat winners' EU MS administrations without central agencies managing Twinning on their behalf at comparative disadvantage
External (to Twinning)	<ul style="list-style-type: none"> Existence of alternative EU modalities to Twinning that enable peer-to-peer cooperation Proportionately lower administration costs against total budget for large TA projects and action grants under PRAG, PAGO DA projects, and (Sector) Budget Support than Twinning 	<ul style="list-style-type: none"> Bilateral funding programmes that enable EU MS to engage in peer-to-peer cooperation with PCs without competition Reduction in the size of public administrations in PCs and EU MSs leading to loss of capacity for Twinning EU MS focus on domestic priorities Perceived weaker commitment to reform in some PCs Political instability & perceived lack of personal security in some PCs

The main external and exogenous factor is the downsizing of public administrations, since the financial, economic and fiscal crisis of 2007-2010. This has affected both the absorption capacity of some PC administrations and the ability of some MS administrations to service Twinning. Both should be seen in the context of standard Twinning as an especially intensive form of collaboration (an endogenous factor), particularly from the PC perspective. In the case of MS administrations, some public bodies have taken strategic decisions to end their involvement in Twinning to focus on domestic priorities. In other cases, they cannot afford to 'let go' of key staff, irrespective of the potential benefits to the individual or the institution. In some cases, the attractiveness of Twinning has diminished due to (exogenous) geo-political developments, such as (perceived) weaker commitment to reform and/or a less secure environment in the PC. This is likely to weigh heavily on any plans to extend Twinning to third countries beyond the neighbourhood, as the same pool of public officials - finite in the short term at least, unless EU MS create a more favourable legal environment to participate in Twinning (see Conclusion 5) - will be spread more thinly.

“The economic crisis had certainly an impact on the capacity of our administration to respond to Twinning”. (Interview, MS NCP)”

“This period coincided with the great economic crash during which time the IMF essentially took control of the public finances, etc. In this period, the number of public servants declined significantly and of those that remained in the system, the primary focus was on domestic affairs. In other words, the resources available for external Twinning programmes significantly declined in this period”. (Interview, EUD).

“Interest in [neighbourhood country] is falling, because of the unstable situation, difficulties with corruption. We need a safe environment for experts” (Interview, MS NCP).

“New financial conditions are less attractive for our administrations. New Member States are at an advantage because their RTAs are less costly, and they are able to deploy more short term expert days than we are. One solution for us is to recruit competent RTAs from other countries but the link with the administration is lost”. (Interview, MS NCP).

“It is possible to award grants to a consortium of Member States though a negotiated agreement of a direct grant award. We are doing this for justice, public finance management and public administration reform”. (Interview, EUD)

The main downside of Twinning, especially under pre-2017 TMs, has been the rigidity of the timescales and especially the budgets, under the rules governing grant assistance (see also Conclusion 5).

The main benefit of Twinning to PC administrations is the direct access to Member State expertise, in other words the peer-to-peer element (cooperation is a working relationship that can be created under any modality, with goodwill and commitment).

Twinning is being ‘squeezed out’ by the availability of alternative modalities in PCs (external to Twinning, but endogenous to the EU) that can replicate or enhance some or all of the benefits, without some or all of the downsides.

As a modality, service agreements are more flexible than Twinning on timing (within the limits of framework and financing agreements) and especially budget. As grant assistance, there is no prospect of a cost extension under Twinning, whereas service contracts regularly include provisions to extend the length and budget by up to 100%. To advance the achievement of EU-PC agreements, the European Commission also employs action grants awarded to public or mandated bodies through a restricted calls for proposals⁵⁵ and governed by the same provisions of the FR as Twinning, but with the (EU MS) applicants able to propose their own vision of how to respond to the overall and specific objectives of the project within the fixed budget and limited timescale⁵⁶. Action grants with public or mandated bodies are also being used in third countries outside the enlargement and neighbourhood regions⁵⁷.

Increasingly, the European Commission is turning to indirect management delegation agreements with government bodies and other entities that have passed the [pillar assessments](#). The Pillar-Assessed Grant or Delegation Agreements (PAGoDAs) are typically larger and longer than Twinning projects⁵⁸.

The projects that are launched under these modalities represent alternative opportunities for the pool of MS public officials interested in working with public administrations in non-EU countries. In some cases, Member States can achieve their

⁵⁵ The latter launched under the PRAG and following the usual two-step process of concept note and full application, preceded by access to guidelines for applicants and an information session, open to all.

⁵⁶ Examples include the latest phases of the ‘Consolidation of the Justice System in Albania’ programme that has been running since 2005, EURALIUS V (€7.5 million, 2018-2021), and ‘Consolidation to Law Enforcement Agencies in Albania’, PAMECA V (€6 million, 2017-2020), which has been running since 2002 with €23 million of total EU funding. In both cases, those applicants that passed the concept note stage were invited to make an oral presentation and answer questions prior to consideration of their full application.

⁵⁷ For example, the 2nd phase of the ‘Rule of Law Programme in the Kyrgyz Republic - ROLPRO 2 (€12.2 million, 2018-2022).

⁵⁸ As illustrated by two projects that correspond with the case study sectors, namely [PRAVO-Justice](#) (€15 million, 3 years, 2017-2020) and the [Public Finance Management Support Programme for Ukraine – EU4PFM](#) (€55 million, 5 years, 2018-2023).

ambitions for supporting PC administrations through their own bilateral funding. This includes co-financing of indirect management⁵⁹.

According to some NCPs, the reduced number of circulated fiches (and ultimately implemented projects) may in the long term undermine the capacities and know-how that EU and PC line ministries had acquired over time by their participation in Twinning. Many EU MS NCPs said that they find it increasingly hard to ‘sell’ Twinning to their administrations for the reasons highlighted in the previous paragraph.

“There is less interest. Far fewer Twinning fiches are being launched. Certain ministries lose know-how, so we concentrate on other [fields]. It takes more time to convince them and explain the procedure” (Interview, MS NCP)

While the new TM addresses many of the shortcomings identified in this evaluation, it is not clear whether it can, on its own, maintain and consolidate the interest of MS and PC administrations.

EQ 2 - *Added value, complementarity and coherence*

To what extent has Twinning added value as an institution-building instrument, compared to other forms of EU assistance, and enhanced synergies with them as well as with other donors’ initiatives? As evidence of added value, to what extent has the use of Twinning ensured coherence with and contributed to general public administration reform efforts?

The Twinning implementation set-up and features appear to have added value to EU external actions, enabling a form of cooperation which, when circumstances are right, addresses partner countries’ needs better than other available EU delivery mechanisms and instruments.

There appears to have been a clear-cut case for Twinning compared with TA for many projects reviewed by the evaluation, with Twinning being the ‘superior option’ when the public sector has special competences not found in the private sector (e.g. managing parliamentary business, policing, air transport safety, surveillance of fish stocks, border control, etc.) and/or the legislative environment is evolving (e.g. cyber-security, data protection), or subject to change (e.g. immediately following introduction of a new EU directive or regulation) that practising public officials would be better equipped to proffer advice than, say, former officials working for private consultancies. In other cases (e.g. prison management, financial control, external audit), expertise resides in the private sector, but Twinning is the ‘preferable option’ to TA because the experience from public officials the political and operational environment of MS administrations is more relevant to the needs of PC administrations, as it provides more directly comparable and relevant insights. Sometimes a reluctance to share classified information with private consultants is also an argument in favour of an MS public sector relationship. In some cases, there is no alternative to engage with PC administrations in a non-intrusive way, as in the case of Parliaments and Ombudsmen (see case study on democratic institutions Volume II, Annex 8).

It is unlikely that the TP could have been implemented (or implemented as well) by TA or other forms of capacity building assistance. The subject matter (maritime safety) is something which is dealt with by public bodies, with the result that relevant expertise and experience is most readily sourced from such institutions. (Desk review)

Given the scope of the TP, and especially the focus on aligning [PC’s] VAT and excise systems with the EU’s, practical assistance with developing risk analysis and computer audit systems, and training of the [PC institution’s] young and inexperienced workforce, it is unlikely that TA or other forms of capacity-building assistance would have been appropriate. (Desk review)

⁵⁹ For example, EU4PFM is co-financed by Sweden’s SIDA, with €5 million of the total €55 million, which is also an implementing partner for the action.

At the same time, there are fields (or aspects of them) that could easily be justified as TA projects (e.g. environmental protection, legislative analysis, human resources management, ICT systems development), if each was a project in its own right. However, these elements are often bundled into a wider transformative package with other TP components in a way that makes the entire package indivisible.

In the IPA region, there are many examples of added value achieved by combining the management and technical experience of ‘old’ MSs with the greater administrative, cultural, linguistic and/or historic proximity that the ‘new’ MSs often share with the PC, including their experience of recently preparing for EU accession.

The evaluation also revealed an interest in peer-to-cooperation among MS administration themselves, such as the TAIEX missions regarding the management of the European Regional Development Fund and the Cohesion Fund within the cooperation framework of DG REGIO since 2015, and similar opportunities since under the EU Partnership Instrument, TAIEX Strategic, the Structural Reform Support Programme and the TAIEX-EIR (Environmental Implementation Review) tool.

The institutional partnership established through Twinning is a unique feature of the modality much valued by PCs but sometimes undermined by implementation arrangements

For PCs, Twinning is unique because it gives access to the knowledge and experience of an entire institution, allowing for a breadth of advice and contacts which could not be achieved under other institutional building tools based on the inputs of individual experts. In this respect, the increasing use of EU experts from outside the selected EU partner institutions (including the RTA), while generally welcomed by PCs eager to broaden the range of EU experience to which they are exposed during a project, has the effect of diluting the concept on which Twinning is based i.e. a partnership cooperation between public administrations. This is even more the case when projects are implemented by EU MS mandated bodies, specialised in project management and able to channel and broke individual expertise from all over the EU. Often these mandated bodies are also competing for projects implemented under other EC delivery mechanisms i.e. service contract, action grant or delegation agreements.

Another feature of the mechanism much appreciated by PCs is the role played by EU experts in facilitating policy discussions or consultation processes.

“We valued Twinning projects to benefit from the experience of counterpart administration from the Member State. This was effective not only to make progress with reforms, but also to bring new perspectives and facilitate change within the administration in a way that is not possible with private consultants” (Interview, CFCE)

Twinning experts were used to clarify or justify particular policy positions during various public consultation activities or during presentations of legislation and other policy documents to senior politicians. Several of the beneficiaries found the technical support of Twinning experts to be extremely valuable during such (often fraught) interactions with stakeholders and considered that they were often very helpful in finding sound practical ways to address comments and questions that arose during the consultation processes. (Case study Twinning in Ukraine energy sector)

Although MSs are the main provider of know-how and advice, benefits from Twinning can be reciprocal.

Looking from the other side, Twinning allows EU MS to showcase their administrative expertise, contributing sometimes to the development of their future or further bilateral cooperation with PCs.

“Twinning projects are important for promoting our expertise abroad. The role of the embassy is to capitalise on the contacts and partnerships established through a project to enrich bilateral cooperation. Our recent experience will help position our national institutions for future bilateral cooperation with [partner country]” (Interview, EU Embassy)

In some cases, the MS partners have found that Twinning not only benefits the PC with regards to institutional strengthening and reforms, but it has also provided an opportunity to reflect on their own policies and practices. As they are sometimes starting with a ‘clean slate’, they have been able to design strategies and systems that are more finely-tuned than the ones they have developed over time in their home administrations.

“We developed the [quality] system better than for ourselves! We don't have time for that process - we have all the elements, it's part of a mosaic. We are going to use that knowledge”. (Interview, MS)

In the enlargement area, the transition from recipient to provider has enabled ‘newer’ MS to continue benefiting from Twinning, including by cooperating with former partners in TP consortia.

There is no standard approach to select Twinning against other delivery modalities. Insufficient attention is being paid to pre-conditions that must be fulfilled to justify the use of Twinning.

During the programming phase, partner countries / EUDs consider the most suitable modality for delivering their objectives and reforms. Twinning should ideally be weighed up against other options (e.g. TAIEX, SIGMA, budget support, TA). The TM does not set out any instructions or guidelines as to the conditions in which Twinning should (or should not) be applied. There appears to be no standard approach when deciding whether Twinning is the best suited assistance delivery mechanism. Different methods are adopted in each partner country as part of the programming process. Even when a grid is being used to decide whether or not a Twinning project deserves funding, it does not weigh up the respective merits of Twinning against other delivery modalities.

“The identification of Twinning projects is organised through a call for interests. The EU Delegation and myself are using evaluation grids in order to assess and rank Twinning proposals. Although both are more or less using the same criteria, there are rather different in approach and detail” (Interview, PAO)

“Beneficiary administrations need advice on which instrument would fit best, and guidelines. There are no criteria about when to use service contract, when to use grants. Sometimes they don't understand when to use Twinning or other forms of cooperation. In some partner countries, there are no standards, it looks sometimes they very randomly chose why TA for one issue, why Twinning for another” (Interview, PC NCP)

In some cases, the choice of Twinning corresponds to a political or managerial decision, either from the EC or the PC as part of the programming process, but often without clear explanation of the reasoning.

The decision to use Twinning over other delivery modalities is not based on rigorous criteria

The lack of appraisal tool means that little attention is being paid at programming stage about the suitability of Twinning to the needs of the recipient administration and the capacity of the latter to uphold the principles and features of Twinning as set out in the TM and on which the added value of the modality depends i.e. well-targeted needs with a clear connection to EU acquis standards and norms corresponding to MS competences, and high levels of PC ownership and commitment and alignment with national reform goals, with adequate capacities in the recipient institution. The evaluation of Twinning in neighbourhood countries recommended that “during the project selection and preparation phase, both the EUDs and PAOs be a lot more rigorous in respect of twinning-related conditionalities. A clear understanding by the beneficiary stakeholders of what Twinning really entails in terms of commitment, workload, achievement of results and absorption capacity is key to achieving success”⁶⁰.

Interviewed stakeholders also noted that, as EUD staffing has been scaled down, there has been a trend towards larger assistance projects that makes Twinning projects less likely to be chosen as a support modality (given the relatively small

⁶⁰ Evaluation of the Institutional Twinning Instrument in the Countries covered by the European Neighbourhood Policy

budgets of Twinning projects). Further, there is a view that PCs very often find it easier to opt for traditional TA contracts which are less burdensome and involve fewer responsibilities.

The decision to finance Twinning projects may also reflect the capacity of beneficiaries to get involved, rather than the most urgent needs of the sector. Interviewed stakeholders revealed that experienced administrations are more likely to apply for projects and receive assistance, as they are more adept at demonstrating the link between their project and the broad priorities of the EU-PC agreements, while more pressing needs may remain unaddressed for want of a body capable of articulating them into a project.

“We are working with a limited number of line ministries which have sufficient capacities to articulate their needs and develop a project fiche with our support” (Interview, PC NCP)

“This is our third Twinning project. Contrary to other ministries, we are very experienced with the mechanism, which suits our institution. It was a learning process: at first it was difficult but the experience we gained on the first project was crucial to apply a second and third time” (Interview, PC stakeholders)

While there is no obvious overlap with other EU delivery mechanisms, the potential for synergies was insufficiently seized

Twining is often seen as a standalone tool, but its benefits can be accentuated by combining it with other instruments. These synergies should ideally be identified during programming. The evaluation provides some evidence of complementarity⁶¹, in the sense that other interventions are typically referenced explicitly in the TPF but clear cooperation/coordination mechanisms are rarely envisaged and described.

Listing other relevant assistance in the TPF is also no guarantee that the Twinning team will liaise or coordinate with them. While project documentation often refers to related ongoing interventions, it provides limited evidence of interaction during implementation, although in the best cases as revealed during the field phase, mechanisms were put in place, often at the initiative of the RTA. There are also examples of TAIEX being used to prepare a Twinning project or to follow up on some recommendations. However, direct coordination i.e. a combined/sequenced deployment of assistance to achieve common specific objectives have rarely occurred.

The TM 2017 is likely to improve the strategic positioning and complementarity of Twinning in line with the PA principles

Evidence from the case studies⁶² show the importance of positioning the TP within the broader reform process and articulating it with other national initiatives and policies and donor’s programmes. As argued by one EU NCP: “The strategic approach should be in place - from the planning phase to long after the twinning project has finished”. This chimes with the guidance introduced in the new TM to ensure better linkages of Twinning with the country’s overall reform process and related initiatives. The new template requires a more rigorous analysis of the country’s efforts in sector reforms and a more detailed description of the framework in which the TP takes places. The integration of PA principles into the 2017 TM, as well as the new Guidelines on Budget Support, should also contribute to a more strategic positioning of TPs within the reform process and complementarity with other EU/international donor initiatives.

In principle, Twinning can trigger new projects or donor-funded initiatives, including those financed under EU support interventions, which contribute to their impact and sustainability as a result. Evidence from the case studies show that successful Twinning projects generated or helped maintain the momentum for sector reforms in partner countries.

There is evidence that the work of Twinning project had a long-term positive influence on the direction of the reform process. The project successfully developed

⁶¹ See Volume II, Annex 4, Finding 72

⁶² See Volume II, Annex 8

regulations on the energy labelling of 3 home appliances, another seven regulations were developed after the end of the project, using the original work of the Twinners as a template. Moreover, the original work of the project on the labelling of domestic appliances was later used by the beneficiary as a guide to the energy labelling of manufacturing equipment. Similarly, a later EBRD project on the transposition of the Directive 125 built on the results of the twinning project to a large extent. (Case study Twinning and Ukraine energy sector)

The Twinning project was instrumental in opening up the ACC to the civil society creating the conditions for a more effective cooperation. Since the project ended, the ACC has been maintaining a dialogue with NGOs involved in the sector, which is crucial for the success of anti-corruption policies. Moreover, the project prepared the ground for a major USAID programme to strengthen the rule of law in Jordan, including further support to the Anti-Corruption Commission (Case study Twinning and Jordan anti-corruption policies).

Continuation of partnerships established by Twinning projects are rare, although there are examples of informal contacts being maintained between individuals long after the project ended.

“Many Twinning partnerships end with the project. We should request Twinning partners to outline an exit strategy in their Final Report. However, there are counter-examples. Recently Poland and Albania signed a MoU to continue the cooperation initiated by the Twinning project” (Interview, EUD)

“Continued cooperation takes place on a personal basis. One German expert who worked on the project in 2012-2013 continues to advise the agency on World Bank and other projects more than five years later. This long-term continuity may help to embed messages and allow follow-up on issues that could not be resolved through the original Twinning project” (Interview, PC NCP)

Since the Twinning, the CTA and the Bavarian State Tax Office (BSTO) have concluded an agreement and have performed joint tax audits of corporate tax, “working very closely together on inspections”. This reflects the multinational nature of business – companies have establishments in both Germany and Croatia. The BSTO performs joint audits with Italy, Austria and Croatia, which would not have happened with the CTA if it had not been for the TP. These joint audits are encouraged by the European Commission and the OECD and are still going on. Alongside this official arrangement, the CTA and BSTO has maintained informal relationships. (Case study Twinning and Croatian revenue collection and administration).

There is little evidence of PA principles being taken into account at design stage and during implementation.

As an institution-building tool for public administrations, Twinning should be implemented in line with PAR objectives set by partner countries, while contributing to the promotion of SIGMA’s principles of public administration (PA). Prior to TM 2017, the TPF template did not require PCs to describe ongoing horizontal public administration reforms. Hence, unsurprisingly, no such description was provided in the reviewed projects, except for TPs which are entirely focused on PAR⁶³.

It is difficult to assess the extent to which reviewed projects have applied these principles during implementation, as reporting on them was not built into ROM, TFR and TRM templates.

There is evidence that Twinning contributed to more accountable and efficient public administration (e.g. by improving governance and services to citizens), one of the PA principles. There are also examples of implementation problems caused by the

⁶³ They were six comprehensive PAR TPs funded during the evaluation period: AL 12 IB OT 01 Support to Albanian Civil Service Reform; AZ/15/ENP/OT/40 Support to the Civil Service Commission in further reforms of the civil service system in Azerbaijan; KS 11 IB OT 01 R Further Support to public administration reform; MD/14/ENP/OT/18 Support to the Civil Service Reform in the Republic of Moldova in line with EU Best practices; MK 10 IB OT 01 Support to the Civil Service and Public Administration Reform and UA10/ENP-PCA/OT/23 Support to civil service development in Ukraine.

insufficient involvement of key reform players, highlighting the importance of another PA principle - policy planning & coordination - for the success and long-term impact of projects.

Overall, however, there is limited evidence from the fieldwork that Twinning activities were implemented taking into account the key principles of PA e.g.

- Sector policies, strategies and action plans are developed in line with general administrative process and quality criteria and the better regulation approach;
- Policy and legislative development (including acquis alignment) involve inter-ministerial coordination, public consultations, regulatory and fiscal impact assessments;
- New public administration institutions are established in line with general regulation for state administration and the organisation of Government structures;
- Job descriptions and internal procedure manual are drafted in compliance with formal decrees on the organisational structure and job requirements and other by-laws;
- Training is coordinated with national training institute for the public sector;
- Developed IT systems are sustainable and interoperable with the rest of the administration, etc.

PA reform has been given more prominence with TM 2017, with clear instructions and tools to ensure that new projects are designed taking into account the PA principles. The ROM and TRM reports do not yet reflect these changes

In line with the mainstreaming of PAR in EU sectoral assistance, the 2017 TM makes direct reference to PA principles that promote good governance and includes clear instructions and tools to ensure that new projects are designed and implemented taking these principles into account. Stakeholders are, for example, invited to “*take into consideration the broader reform picture in the Beneficiary country, aiming at ensuring coherence and coordination between the project and other actions, especially ongoing horizontal public administration reform efforts and sectorial activities that could have an impact on the project*”⁶⁴. The TPF must refer to horizontal PAR efforts and design the project in line with PA principles (for example, by foreseeing short-term expertise to carry out regulatory assessments). Likewise, the final report must now include concrete recommendations and strategies for safeguarding the achievement of the mandatory results and must explain how the project has ensured compliance with and/or contributed to the general public administration reform efforts in the country.

Moreover, all TPFs are to be screened by the PAR coordinator in the EUD and/or the PAR-responsible entity in the PC using the PAR mainstreaming checklist developed by DG NEAR A3. Last but not least, the EC set up the COTE on Public Administration, which is responsible for providing advice and quality-check of TPFs in the light of PA principles.

It should be noted that the ROM and TRM reports do not yet reflect mainstreaming of PA principles.

⁶⁴ TM 2017, section 5.2.4

6.2 Sectoral evaluation questions

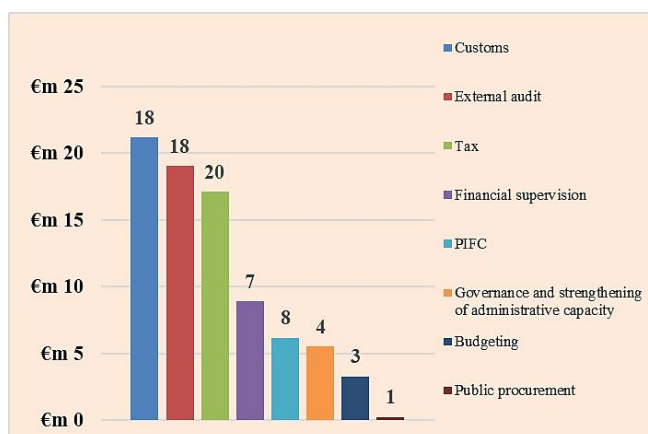
EQ 3 - Public finance management

To what extent has the use of Twinning contributed to the improvement of sound public financial management in line with candidate countries, potential candidates and neighbourhood countries' public financial management strategies?

Over 70% of PFM projects were in the sub-sectors of revenue management and external audit.

This evaluation has focused on two aspects of sound public finance management (PFM), namely efficient revenue collection and administration ('tax' and 'customs' in Figure 16⁶⁵), and a fully independent and effective supreme audit institution (SAI). Together, these two sub-sectors constitute 56 of the 79 Twinning projects on PFM, as Figure 16 shows:

FIGURE 16: TWINNING PROJECTS IN THE FIELD OF PFM (2010-2017)



Twinning has contributed to strengthening laws, strategies, systems, competencies and communications

The evaluation team examined six Twinning projects in five different national tax/customs administrations in enlargement and neighbourhood countries, namely: Croatia (as the case study country), Egypt, Georgia, North Macedonia, and Serbia. Within the scope of these projects, Twinning can be characterised as covering one or more of the following elements:

- Reviewing and enhancing the legal and regulatory framework, in line with EU acquis (harmonisation / approximation) and international standards, within the national policy and administrative context;
- Developing the strategy and systems of the tax/customs administration in line with the legal and regulatory framework, introducing new partnerships, techniques, methodologies, processes, and procedures, and documenting them in plans, models, guidelines, instructions and manuals;
- Building administrative and operational capacity to implement and enforce tax/customs legislation, and to facilitate continuous improvement and modernisation, through staff training, coaching and study visits, as well as strengthening support functions, including human resources management (HRM);
- Improving taxpayer communication and access to services, including awareness of changes, and use of online media to enable taxpayers to find information and interact with the tax/customs administration.

Given the scope of revenue management, Twinning tends to be focused in narrow fields and functions

Given the vast scope of revenue administration, with regard to different types of tax and excise covered by the EU acquis and national legislation, and the full range of functions performed by designated administrations, the sampled projects typically focused more on specific fields and functions, such as property tax, VAT and excise, customs laboratories, criminal tax acts, taxpayers' services, IT applications and HRM

Based on reviewed documentation and interviews, each TP appears to have achieved most or all of its mandatory results. Some were not fulfilled, due in part to extenuating circumstances (e.g. uprising, change of government and security

⁶⁵ Customs administrations are not responsible solely for revenue collection and administration (taxes and duties), they are also engaged in matters of security and facilitating trade. For this evaluation, TPs concerned with customs administration are assigned to PFM.

situation in Egypt); in another case, the TP was successful in producing detailed recommendations, but there is no high-level commitment as yet to financing their implementation. From this, we can conclude that Twinning has strengthened institutional know-how in the specific fields of focus, but that this does not necessarily translate into impact, at least in the short term.

Capacity-building should strengthen performance in revenue out-turn and reduce arrears.

In principle, the theory of change is that this enhanced capacity should feed through into better performance in revenue out-turn and hence reduced arrears, *all other things being equal*, which will enable the country to become fiscally stronger and invest in public services.

In the Croatian case study, for example, the tax administration benefited from a Twinning light on criminal tax acts, which has improved internal systems, but also included the organisation of joint audits with the Member State partner which have continued through a formal agreement, making it more likely they will uncover errors in corporate tax, whether intentional or unintentional. Indeed, a common thread among several of the TPs is cooperation with other stakeholders, given the effective identification and correction of undeclared revenue requires partnerships with interior ministries, police forces, anti-corruption & anti-money laundering agencies and public prosecutors. From a situation where there was no structured dialogue between agencies, the joint training activities under the Twinning resulted in the Croatian Tax Administration signing a formal agreement with the police and the State Attorney to work together closely. The creation of sustainable relationships, both within the partner country and with international counterparts, is crucial to longer-term impact.

“Information is the central value good of a tax administration ... It is always an advantage to know persons in another administration. [My colleagues] now have a framework of information exchange.” (Interview, MS)

Too many factors to attribute impact to Twinning intervention, but some changes put in train should shape taxpayers' behaviour down the line.

Typically, tax/customs administrations have strategic development plans that spell out the wide array of actions that are required to achieve their overall goal of greater effectiveness and efficiency, as measured by increased collection rates and client service satisfaction. In practice, it is very difficult to attribute impact on the nation's revenue and debt levels to small-scale and specific interventions, given the many other contributing macro-factors, most notably economic conditions, the security situation and the rule of law⁶⁶. Nevertheless, changes set in train by Twinning might bear fruit in the medium-long term through downstream ‘ripple effects’, whereby the introduction of new or revised laws, procedures and/or practices trigger second-order changes which have further consequences down the line. For example, the TFR of Egypt's real estate tax administration project makes a compelling case that its limited results could be far-reaching and sustained beyond the TP by affecting the behaviour of taxpayers, and in turn, the tax administration itself.

A truly independent SAI with a full mandate is essential to PFM and the quality of public administration.

The Supreme Audit Institutions (SAIs) play an essential role in improving the quality of public administrations and their service delivery. In a functioning democracy, a transparent and accountable PFM system requires a fully independent SAI, reporting to Parliament, which is capable of professional scrutiny of the executive's management of public funds. For enlargement countries, this is a pre-requisite for EU membership.⁶⁷ SAIs should be legally protected by a supreme court and able to carry out a full mandate (financial, compliance and performance audits) across all public financial operations, regardless of whether and/or how they are reflected in the national budget, without undue direction and interference by the executive or legislature in their operations. The appointment and removal of the head and

⁶⁶ As argued in the ROM and TFR reports

⁶⁷ The principles and parameters of a fully independent SAI were set out in the International Organization of Supreme Audit Institutions (INTOSAI)'s 1997 Lima Declaration and 2007 Mexico Declaration on SAI independence, and the International Standards of Supreme Audit Institutions (ISSAI).

Twinning can help to build functional and operational independence

members should follow due legal process and the executive should have no direct control or direction over the SAI's budget formulation and approval.

To meet these principles in full, the SAI must be independent *de jure* and *de facto*. Twinning cannot directly influence the *legal and financial independence* of the SAIs, which are matters for the PCs' legislature and executive alone, subject to the political pressures exerted through the enlargement and neighbourhood policies, especially the accession (chapter negotiation) process, and could be seen as pre-requisites for Twinning to achieve an impact. Interviews raised concerns that the appointments of Auditor-Generals in partner countries was becoming increasingly tied to party interests, raising the prospect of political interference in choice of audited institutions and topics, although there is no direct evidence as such. What Twinning can do, however, is contribute towards supporting their *functional and operational independence* by developing the SAI's technical capacity and professional competence.

During the desk and field phases, the evaluation team examined five TPs in the enlargement and neighbourhood (east) regions, namely Twinning with the SAIs for Kosovo*, Moldova, Montenegro and, as a case study, Serbia. Within the scope of these projects, Twinning can be characterised as covering one or more of the following elements, according to needs and circumstances:

- Reviewing the legal framework to ensure it aligns with EU standards and the ISSAIs adopted by INTOSAI Congress;
- Supporting organisational development (including restructuring) and human resources management (e.g. through job descriptions, recruitment, appraisals, career planning, training and development, and other systems);
- Developing methodologies, instructions, guidelines, checklists and manuals for adoption by the SAI, including quality control and assurance procedures;
- Coaching and training staff in the new processes, including training of trainers to create a multiplier effect, and study visits to see practices in place in Member States;
- Conducting pilot audits alongside the trained staff, to test the new techniques and facilitate learning-by-doing;
- Introducing computer-assisted auditing, to increase the SAI's efficiency;
- Improving the SAI's visibility on a national and international level, to consolidate its independence, give prominence to its role and findings, and access global expertise.

Given the focused remit of SAIs, Twinning can have a measurable effect on capacity and performance

Compared to tax/customs administrations, which are complex organisation with many different functions, Twinning can have a more noticeable and measurable effect on SAIs' capacity and performance, given their narrower and more focused remit. Moreover, the sampled SAIs were in the early stages of development or transition, and given the tradition of financial management in the PCs, they tend to be more familiar with regulatory compliance than the techniques of risk-based financial audit or performance audit, and hence ripe for expert input. The main constraint on Twinning's impact is the fact that audits are planned, executed and followed up on an annual fiscal cycle, and hence a 24-month standard Twinning would not allow sufficient time to complete more than one cycle in full.

Based on evidence from the evaluation, Twinning has helped to underpin the functional and operational independence of SAIs and contributed to change management, as well as a technical exchange of know-how. The example of Serbia's SAI, with two TPs implemented over 2012-2018, is a case in point (see annex 7). As

a maturing and expanding organisation established in 2005, the SAI was able with the help of Twinning to:

- Fulfil its audit mandate by extending its financial audit coverage (into local government, mandatory insurance funds and the central bank), shortening the process to include more auditees, introducing performance audits for the first time (and has now moved from two per year to 12 next year), and separating out compliance audits to improve efficiency;
- Improve its quality control and assurance, thereby increasing the credibility of its audit reports and enhancing its reputation; and
- Raise its profile with the parliament and the public, thereby increasing the transparency and accountability of the public administration.

As with other TPs, these enhancements did not occur in isolation, as the SAI also benefited from EU-funded and other technical assistance, as well as SIGMA support.

Twining's ultimate impact requires audited institutions to apply SAI findings

Ultimately, Twinning's impact is conditional on the willingness and ability of audited institutions to accept and apply the SAI's findings. Unsurprisingly, the process of fomenting and cementing SAIs' relationship with their Parliaments, so that they ensure implementation of audit recommendations, takes longer and is subject to factors typically beyond the TP's control. Similarly, the ability of audited institutions to take on board the changes required by audit reports will depend on their own capacity, not least the strength of public internal financial control (PIFC) systems. However, it is also clear that building a reputation based on quality earns SAI's respect and enables it to exert greater influence.

“There is now 100% acceptance of audit findings. In 2017, there was 75% implementation of our recommendations. It is not possible to compare directly year-on-year, as there are different bodies audited each year but you can see the improvement in both compliance and financial audits. For example, the accounts of the mandatory social insurance funds received qualified audit opinions – now they are unqualified opinions”. (Interview, DRI)

Ongoing exchange of experience happens through international SAI forums

Looking beyond the individual TPs, the relationship between Twinning partners seems to be sustained less by bilateral contacts, and more through membership of INTOSAI and its regional equivalents, EUROSAI and AFROSAI, as the umbrella bodies for all SAIs. Regular meetings, committees, working groups, task forces and training events provide the fora for ongoing exchange of experience.

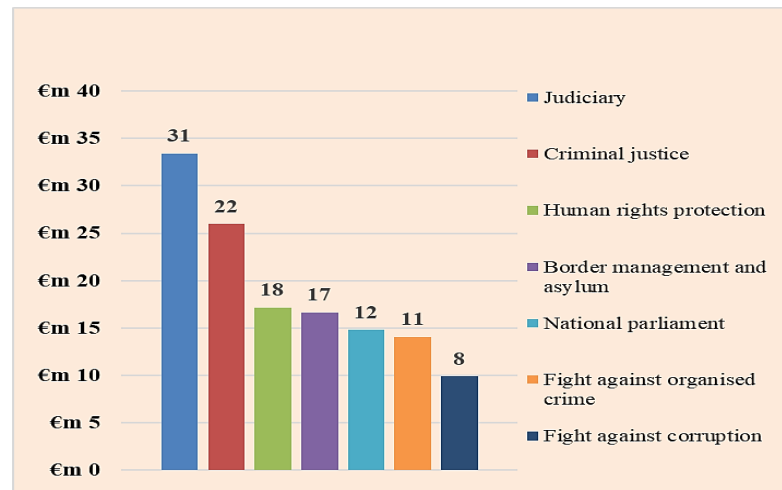
EQ 4 - Rule of law

To what extent has the use of Twinning in the area of rule of law contributed to strengthening the institutional setting in line with good governance principles and the effective functioning of the institutions guaranteeing democracy and rule of law in candidate countries, potential candidates and neighbourhood countries? In case this did not happen, what were the obstacles encountered?

A fifth of Twinning projects in the sector of rule of law helped strengthen democratic institutions and fight corruption in partner countries

Over the period 2010-2017, a total of 119 projects for a total value of €132m were implemented in the field of rule of law across 17 partner countries (90 in IPA and 29 in ENI countries). The bulk of the support went to reforms of the justice sector, including criminal justice (see Figure 17). The focus of EQ4 was on Twinning

FIGURE 17: TWINNING PROJECTS IN THE FIELD OF RULE OF LAW (2010-2017)



projects targeting institutions guaranteeing democracy (parliaments and national human rights institutions/ombudsmen) and national agencies in charge of anti-corruption policies.

Projects addressed capacity and institution building needs to enhance the performance of targeted institutions

In the field of democratic institutions, the evaluation team examined six Twinning projects in the enlargement and neighbourhood regions, namely, Albania (as the case study country), Morocco and Bosnia and Herzegovina for Parliaments; and Morocco⁶⁸ and North Macedonia for NHRIs/Ombudsmen⁶⁹. Within the scope of these projects, Twinning can be characterised as covering one or more of the following elements:

- Strengthening the institutional framework for the protection of human rights in partner countries in line with the Paris principles⁷⁰ and building administrative and operational capacity of NHRIs/Ombudsman offices to promote fundamental rights and freedoms;
- Reinforcing the performance of anti-corruption bodies in preventing, detecting, investigating and prosecuting corruption in cooperation with other stakeholders; and
- Enhancing the role of Parliaments by improving law-making (including drafting and reviewing legislation), strengthening oversight activities of government action and public policies and promoting greater budgetary autonomy, through amendments to legislative and regulatory frameworks, capacity building of

⁶⁸ AL 10 IB OT 01 Strengthening the Assembly of Albania, AL 14 IPA JH 01 16 Further Strengthening the Assembly of Albania in the context of EU Accession, BA 12 IB JH 01 Enhancing the role of parliaments in Bosnia and Herzegovina in the EU integration context, BA 13 IPA JH 01 16 TWL Support to the administrative structures for EU integration related tasks of the Parliaments of Bosnia and Herzegovina and MA41 Appui à la Chambre des Représentants du Royaume du Maroc

⁶⁹ MK 11 IB JH 01 TWL Promotion of the Ombudsman competences and enhancement of its capacities; MA/14/ENP-AP/OT/32 Renforcement des capacités du Conseil National des Droits de l'Homme (CNDH) du Royaume du Maroc à exercer ses missions de protection et de promotion des Droits de l'Homme

⁷⁰ The Paris principles relating to the Status of National Institutions is a UN-sponsored charter laying out the competence, responsibilities, composition, autonomy and methods of operations of national human rights institutions.

administrative and operational staff and advice and recommendations on HR management, communication policies and information systems.

Twinning support towards NHRIs/Ombudsmen coincided with genuine reforms engaged by partner countries

The three NHRIs/Ombudsmen projects reviewed were instrumental in building capacities through training and showcasing of EU best practices. Morocco was one of only two ENI South countries implementing a Twinning project in the field of human rights protection⁷¹. It contributed to strengthen the National Human Rights Council (NHRC) which was granted new powers after the constitutional reform of 2011. The advice and the exchanges between EU and Moroccan experts, which the Twinning made possible, helped firm up the NHRC reform agenda and built its operational capacities to address human right abuses across the country. These achievements were acknowledged in a recent report by Human Rights Without Frontiers praising NHRC's work in connection with tackling domestic violence and promoting women's and children's rights: *'The NHRC and its regional branches have been instrumental in reporting and disseminating information about violations as well as bringing together stakeholders to collaborate on solutions'*

Achievements remain fragile and dependent on adequate funding to sustain the operations of the recipient institutions

The profile and visibility of Ombudsmen office were strengthened, in particular through outreach and awareness campaigns. However, budgetary constraints and lack of political support often weakened the day-to-day operations of Ombudsman offices, reducing their ability to respond to violations of citizens' rights in an independent and effective way. In North Macedonia, for example, the Final Report of a Twinning Light project implemented with the Austrian Ombudsman Board⁷² noted that while the project "enhanced the capacity of the Ombudsman and the quality of the staff in line with the international standards and best practices, there was a need for political support, including through the allocation of sufficient financial means to ensure that Ombudsman Office could carry out its functions as intended by law".

The four Twinning projects supporting legislative bodies appeared well aligned with national reforms and responded to genuine technical and organisational needs linked to the enlarged competencies granted to national legislatures in the context of democratic reforms (ENI) and EU accession process (IPA).

Twinning in the IPA region provided much needed support to enhance the work of the legislature in the context of EU accession

In IPA countries, Twinning contributed to improve democratic governance by strengthening oversight functions and budgetary autonomy of parliaments in line with the Copenhagen criteria, enabling also a more efficient law-making process in the context of EU accession. This assistance was crucial for national assemblies to cope with the growing legislative workload connected with EU approximation, which required improved and faster legislative procedures. This was the case in Albania, for example, which benefited from two Twinning projects taking place six years apart⁷³. The first one was implemented with Hungary⁷⁴ at a time when the Albanian assembly had only limited experience with EU matters. Combining training, practical exercises and recommendations for improving the legal and regulatory framework, the project laid the ground for a stronger control of the executive and a more active involvement of standing committees in the European integration process. The second project implemented with Greece took place in a different context, after Albania had become a candidate country in 2014 and a new law regulating the role of the Parliament had been adopted. The project helped adapt parliamentary procedures to this new legal framework while further strengthening the capacities of standing committees in approximating EU legislation and overseeing the executive, with some activities already geared towards preparing the Assembly for EU accession negotiations. The insufficient involvement of MPs and decision-makers in the projects was noted as a major weakness for the sustainability

⁷¹ The other one being Tunisia. The project was led by France in consortium Austria and the Netherland

⁷² Together with the Ludwig Boltzmann Institute of Human Rights.

⁷³ See Volume II, Annex 8 Case study

⁷⁴ It is interesting to note that six out of the nine parliamentary projects in the enlargement region were implemented with the Hungarian National Assembly as lead partner.

of project results. Both TFRs included a long list of recommendations requiring political decision to consolidate outcomes and achieve long-term impact. However, it is undeniable that the Albanian legislature has improved in recent years as acknowledged by the EC itself. The EC Progress Report 2009 remarked that “Parliament only partially exercised its oversight over the executive. To progress on approximation of legislation, parliament will have to strengthen administrative capacities to perform its control functions over the legislative process”. In contrast, the 2018 EU progress report noted that the Parliament: “Overall, the role of the Parliament in initiating and amending legislative proposals, as well as consultations in parliamentary committees, has increased”,

Although fewer in number, TPs supporting parliaments in the ENI region were just as timely, responding to the needs of national assemblies as they adjusted to new constitutional arrangements

There were only two Twinning parliamentary projects implemented in ENI, one in Tunisia and the other one in Morocco. Both projects involved France as lead partner and sought to reinforce the role of national assemblies in the context of constitutional reforms, carried out in the wake of the Arab spring, which shifted the power relationship between the Parliament and the executive. Twinning provided much-needed expertise to reinforce parliamentary scrutiny over the executive, promote the assemblies’ administrative and financial autonomy and improve transparency and communication towards the citizens. The advice and recommendations from EU experts were timely, given that the assemblies in both countries were newly elected with many first-time MPs lacking the experience and knowledge of how an empowered parliament should operate. The projects enhanced the administrative capacities of both assemblies, adapting rules of procedure to reflect constitutional changes and promoting the use of new management and information tools to enhance the efficiency of the legislative process. By providing this important technical advice and support, Twinning helped assemblies adapt to the new constitutional arrangements, which was crucial for consolidating democratic reforms in both countries.

Twinning appears particularly well-suited to support parliamentary reforms in partner countries although the fact that only a few of them chose to implement projects in this field illustrates the sensitivities of providing external assistance to the sector, which is not possible without a strong political commitment. However, all interviewed project beneficiaries agreed that such projects are very valuable, not only for their capacity building outcomes, but also for the closer working links they helped forge between institutions and individuals involved.

Twinning helped anti-corruption bodies fulfil their mandate by raising capacities and strengthening the legal framework

In the field of anti-corruption policies, the evaluation reviewed three Twinning projects, one in Jordan and two in Montenegro⁷⁵. Twinning support was geared towards strengthening the institutional framework and helping anti-corruption bodies fulfil their mandate in cooperation with key policy players through advice and recommendations, training and study tours. The Jordanian project was the only anti-corruption Twinning project funded in the ENI South. Involving Finland as a lead partner, it helped strengthen the Anti-Corruption Commission, which Jordan established a few years earlier as part of a national strategy to tackle corruption. The project developed rules of procedures and built staff capacities, in particular in the fields of investigation, complaints handling and whistle-blowing while raising the awareness of stakeholders about the need for anti-corruption policies and effective responses from the administration⁷⁶. The TFR included a long list of recommendations to tighten further the anti-corruption framework which the project could only improve marginally because of its limited scope.

In the IPA region, two Twinning projects were delivered to anti-corruption bodies in Montenegro⁷⁷. According to the ROM report, the first project with Germany

⁷⁵ JO/10/ENP-AP/JH/16 Support the implementation of the Anti-Corruption Commission's Strategy in Jordan; MN 10 IB JH 03 Support the implementation of the anti-corruption strategy and action plan; MN 14 IPA JH 01 16 Support the implementation of integrity measure

⁷⁶ See Annex 8 Case studies

⁷⁷ The first one implemented from 2012 to 2014 and the second one starting in late 2016 for 22 months. Since the project is ongoing, there is no TFR and it is not possible to make a preliminary assessment of results achieved until present

provided critical institutional support to anti-corruption policies in the country. However, the project struggled to achieve coordination between the two bodies which shared competencies in fighting corruption. They were eventually merged into one Anti-Corruption Agency becoming operational in January 2016 and whose capacities are now being strengthened by an ongoing project with Italy.

While this support made a worthwhile contribution to the fight against corruption, it was insufficient on its own to curb corruption levels in partner countries

As in Jordan, the support appears not sufficient to change dramatically the situation on the ground. According to the EC, anti-corruption reforms have not yet borne their fruits: *‘while progress has been noted in establishing an initial track record in the area of repression of high-level corruption and some forms of organised crime, in several areas the impact of legislative and institutional reforms is not yet entirely visible, and the results in terms of track records still remain limited. This applies in particular to some areas of prevention of corruption, seizure and confiscation of criminal assets. In those areas convincing results are still awaited or sanctions foreseen by the law are not yet effectively applied’*⁷⁸.

While Twinning had no significant influence on the actual incidence of corruption as well as perceived levels⁷⁹, as acknowledged by beneficiaries themselves, given the limited scope of the projects and the number of factors nurturing corruption, there was a consensus that the projects, in addition to immediate capacity building outcomes, helped build consensus among national stakeholders regarding policy options and the scope of further reforms needed to put effective law enforcement and prevention mechanisms in place. More generally, it was felt that EU assistance was instrumental in maintaining the momentum of anti-corruption reforms in the country. However, impact was lost because projects tended to be isolated instead of addressing corruption from different angles and targeting a wider range of stakeholders through a more comprehensive reform programme. Projects also lacked strong links to the strategic framework defined at national and international levels (e.g. UNCAC) to which partner countries committed.

A common weakness of reviewed projects was that too little space was available during implementation to ensure that the knowledge and advice provided by EU experts were effectively absorbed by the recipient organisations, often due to heavy workloads resulting from an overambitious number of activities.

⁷⁸ Non-paper on the state of play regarding chapters 23 and 24 for Montenegro (May 2017)

⁷⁹ This is the case in Jordan which implemented its Twinning between 2011 and 2013. According to Transparency International’s 2016 Corruption Perceptions Index, Jordan’s score stood at 45 registering a drop of 5 points compared to the year before, pushing Jordan 12 places down the ranking list. In 2006, Jordan scored even higher at 40.

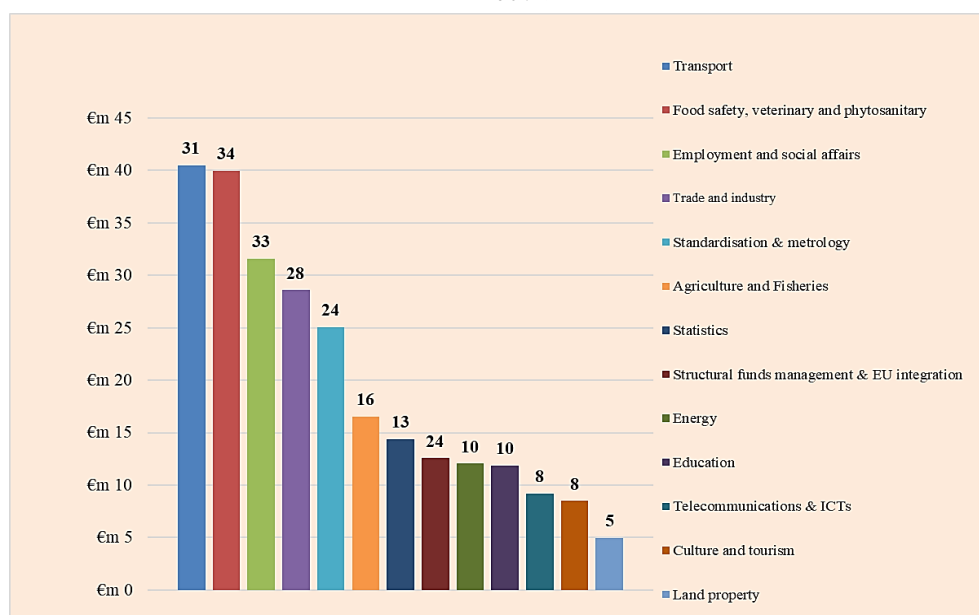
EQ 5 - Economic governance and competitiveness

To what extent has the use of Twinning in the area of trade and competitiveness contributed to the improvement of the relevant institutional frameworks and structures and therefore contributed to socio-economic development of candidate, potential candidate and neighbourhood countries by inter alia an improvement of the business climate, an increased competitiveness of the economy and a better economic integration with the EU? In case this did not happen, what were the obstacles encountered?

About 20% of EGC projects were connected with agriculture and fisheries including phyto-sanitary. Only 10 projects supported energy reforms over the period

Over the period 2010-2017, a total of 244 projects for a total value of €256m were implemented in the field of economic competitiveness and governance⁸⁰ across 20 partner countries (97 projects in IPA countries and 147 projects in ENI countries). The bulk of the support went to reforms in the sectors of transport, employment and social affairs and social affairs and food safety and phytosanitary (see Figure 18).

FIGURE 18: TWINNING PROJECTS IN THE FIELD OF ECONOMIC GOVERNANCE AND COMPETITIVENESS (2010-



The focus of EQ5 was on Twinning projects targeting agriculture and fisheries (including phyto-sanitary) and energy. In total, there were 34 food safety and phytosanitary projects and 16 projects in the field of agriculture and fisheries while ten projects supported reforms in the field energy.

The sample included four energy-related TPs (beneficiaries comprising agencies responsible for the regulation of energy or the management of electricity supply in Jordan, Serbia and Ukraine⁸¹); four agriculture/fisheries-related TPs (beneficiaries including bodies responsible for fisheries management and SPS measures in Bosnia and Herzegovina, Moldova and Turkey); and TPs concerned with transport (maritime safety in Azerbaijan) and the environment (flood management in Turkey).

For all TPs, the framework agreements with partner countries provided the overall enabling structures for TP intervention and these agreements reference the long-term objective of closer EU economic integration/relations (SAA for Western Balkans and the European Neighbourhood Policy). The partner countries have signed up to harmonise legislation and introduce the necessary institutional reforms to improve economic governance and competitiveness and thereby access some or all EU markets (industrial goods, agricultural products, etc.) by a progressive removal of customs tariffs and quotas, and an extensive harmonisation of laws, norms and regulations in various trade-related sectors. The framework agreements are supplemented by other agreement such as the Energy Community, which brings

The main economic governance support Twinning activities were assessment of primary/secondary legislation, drafting of subsidiary documentation and institutional building support

⁸⁰ Including projects in the field of food safety, veterinary and phytosanitary

⁸¹ See Volume II, Annex 5 Case study Twinning

together the EU and Western Balkans and some Eastern Partnership countries to create an integrated pan-European energy market.

The main support provided by those TPs reviewed to answer this question involved: 1) assessment of primary/secondary legislation, 2) drafting of subsidiary documentation/secondary legislation and 3) capacity /institutional building support.

Twinning has proved an effective modality to build enabling institutional frameworks to support economic competitiveness

Broadly, the TP interventions have been successful in contributing to the improvement of the relevant enabling institutional frameworks and structures. The majority of TP mandatory results were achieved. Those results that were not achieved was mainly due to institutional malfunctions beyond the remit of the TP to address and/or lack of political support to affect the required changes. Evidence to confirm whether this institutional improvement resulted in positive business climate change, economic competitiveness or closer integration with the EU proved more elusive. This was the case for two reasons. In the first instance, it is broadly recognised that there is a time lag between institutional support actions and affected economic change, particularly with economic actors, such as SMEs. This is understandable. Public institutions require time to adapt to and enforce new standards and economic actors to change their production and quality assurance processes, accordingly. The change dynamic can prove even more time exacting when dealing with sensitive sectors involving energy production/supply, food quality, public health or meeting stringent export conditions. Secondly, the necessary commitment of public and private actors to follow through and capture the economic benefits facilitated by the TPs through institutional change failed to materialize.

Long-term competitiveness improvements after Twinning were dependent on reforms being fully actioned

In the case of the standard TP “*Support the National Energy and Utilities Regulatory Commission (NEURC) of Ukraine in the Process of Electricity Market Reform*”, the project objective was to align the electricity market to Energy Community legal requirements. All mandatory results were achieved according to the TFR including the drafting of secondary legislation and capacity building support. The TFR report also noted a strong commitment from the government and full involvement of relevant stakeholders. The field phase however did not identify the impact of the TP outputs on the competitiveness of the sector in Ukraine and specifically impact of the most important mandatory result which was the – “*design of a contractual system through which market participants would gain non-discriminatory and transparent access to the transmission and distribution networks*”. It can be argued, however, that the institutional building and training has brought Ukraine closer to the European Energy Community but until the reforms are fully actioned, the business climate and economic productivity gains will not be realised.

Comparably, the Jordanian TP ‘Institutional building support to the National Electric Power Company (NEPCO)’ also facilitated competitiveness impact change. The partner country has limited natural resources and the Ministry of Energy & Mineral Resources (MEMR) is opening up the market for private investors in the renewable energy sector through the enabling regulatory framework of the Renewable Energy & Energy Efficiency Law. The TP contributed to improved load management on the national electricity grid and the increased integration of renewable power sources. TP outputs supported the regulatory business environment to attract private sector investment and supply diversification. Jordan is keen to increase foreign private investment in the energy market to reduce reliance on multilateral loans and thereby better manage the national debt.

In the agriculture sector, evidence of TP institutional building directly resulting in improved business competitiveness and closer integration with EU markets was identified. The EU food market is a major target for third country producers, worth over €101bn in 2017, with the fresh food and processed dairy are major sub-sectors of the market. Meeting the technical trade barriers to supplying these market sectors is complex and demanding. TPs in BiH have supported competitiveness and EU economic integration through alignment with EU food safety production standards,

Twinning works best by carrying forward approved economic strategies and/or primary legislation, before project start.

increased testing capabilities by institutions and training support to Food Business Operators (FBOs). This has resulted in EU approvals FBOs supplying EU markets.

The TP ‘*Support to enhancing export potential of agricultural and food products to the EU*’ (09/2014 - 03/2015) aimed explicitly at economic integration with the EU, with the overall objective of “removing trade barriers with the EU and countries in the region”. As confirmed in the field phase the project directly contributed to the EC decision in 2015 to put BiH on the A and B list of countries allowed to export liquid milk and dairy products to EU markets. Specifically, the project contributed to meeting HACCP, GHP and GMP hygiene standards. The project provided training to health and safety bodies at State, Entity and Brcko District levels to ensure food and feed quality standards. It included the Food Safety Agency of BiH and, State Veterinary Office of BiH as the project leaders on the side of the Beneficiary that acted in cooperation with other competent authorities at Entities and Brcko District levels, including line ministries, the Federation of BiH Inspection Administration and Republika Srpska Inspection Administration. Milk and dairy product exports in 2016 increased by 11% compared to exports from the previous year. The BiH dairy industry is expanding high market value foodstuffs for EU markets, such as cheeses, sour cream, yoghurt and other fermented products.

Access to EU dairy markets is a direct result of the twinning project. BiH can also export liquid milk which has more demanding standards than processed dairy products. We want to repeat this success with other sectors and the expansion of poultry sector exports is our next target by repeating the same quality system for the dairy sector. We will use twinning again for other sectors.⁸²

To a similar degree, the BiH TP IPA 2012 Twinning Project “*Further strengthening the phytosanitary sector capacities in the field of plant protection products*” also had a direct impact on the competitiveness of the agriculture sector. Beneficiary interviewees in the field confirmed that the institutional building supported the setting up of the regulatory framework for plant health, seed/seedlings and plant health and the organizational structure to carry out phytosanitary inspections and monitoring. The regulatory and testing framework introduced EU and ISO standards (bacteria, GMO, fungus) allowing Bosnian potatoes to enter EU markets. In 2015, BiH received approval from the EU’s Food and Veterinary Office which has opened up high value EU markets for producers in South BiH producing early spring potatoes.

While there is evidence of TP institutional building having a direct impact on business competitiveness this is conditional to individual cases. TP beneficiary institutions may not have the political support to action institutional reforms, or the relevant business sector may not be in a position to respond to higher productivity requirements. In these cases, TP results have laid the foundation for future national or donor supported action to realise the economic or business competitiveness change. This was underlined during EUD interviews in BiH that identified the positive consensus support feature of TPs when RTAs/experts deal with diverse political institutions with separate mandates and objectives.

Because of the complex political institutional situation in BiH, TPs have been successful in bringing different political actors together to come to a consensus on regulations and training support, this is an achievement in itself and service contracts would not be as effective as an RTA acting as a facilitator. The direct results may not be straightaway, but the understanding created provides a higher chance of success.⁸³

⁸² Interview Food Safety Agency of BiH, November 2018

⁸³ Interview EUD November 2018

Twinning interventions must be followed up with political support and regulatory enforcement to ensure economic competitiveness benefits are achieved and sustained.

Clearly, institutional building is a process and direct change should not be expected immediately once a TP has concluded. It should be noted that the success of TP agriculture competitiveness change in BiH was built on a foundation of previous regulatory change donor interventions including support from the Czech Republic.

The main obstacles noted in institutional frameworks facilitating tangible economic change are the absence of political support, changes in policy priorities and lack of financing and resources (particularly for regulatory enforcement/checking). As in the case of BiH, despite the complex political situation, tangible business change did occur in the agriculture sector with the business community and business and public sector regulators working effectively together to increase agri-food exports.

7 OVERALL ASSESSMENT

The evaluation has highlighted the solid performance of Twinning to exchange public sector expertise and build the capacities of PC administrations in line with EU-PC agreements.

The impressive number and range of projects implemented over the period in both enlargement and neighbourhood regions shows the capacity of Twinning to respond to the variety of needs of PC administrations.

The spur of the accession process was an important ingredient in the success of projects implemented in enlargement countries; the transposition of the EU acquis provides a clear framework for organising MS-PC cooperation. By contrast, ENI countries are not under the same pressure to align their legislation and systems with the EU. However, the expected socio-economic benefits to be derived from access to EU markets can be a strong motivation for (partial) EU convergence. The desire to learn from EU models in order to strengthen domestic institutions and improve governance is another important motivation for ENI countries where Twinning has proved its value. To be successful, this transfer of know-how requires solid foundations in terms of PC's legislative and institutional frameworks, which also puts a limit on the envisaged geographical extension of the modality.

BOX 1 KEY SUCCESS FACTORS OF TWINNING PROJECTS

The evaluation identified key success factors for the implementation of Twinning and the long-term impact of TP results, including:

1. A clear-cut demand for up-to-date EU public sector expertise to address well-defined operational needs in the host administration, especially where public administrations have special competences that are not found in the private sector, and/or the legislative environment is evolving or subject to change;
2. Robust policy and reform frameworks already in place in the sector;
3. A clear positioning of the TP within the public administration reform process;
4. A strong and continuous political will in the PC to commit resources, implement activities, adopt outputs and fulfil recommendations;
5. A clear mandate of the host administration in the sector with sufficient capacities (particularly staffing) to participate in Twinning activities;
6. A combined / sequenced deployment of Twinning with other initiatives/assistance available to reach PC reform objectives;
7. Well-qualified RTA with an understanding of the PC administration's needs and constraints, and the overall country context, strong management and interpersonal skills, and the ability to build and maintain strong institutional links between the EU and the PC, including through a well-defined exit strategy;
8. The possibility to access expertise from across the EU to enhance the sharing and transfer of knowledge in the field of the project;
9. An effective deployment of EU expertise through an early identification and preparation of committed STEs;
10. A vigorous visibility and communication strategy to engage with stakeholders, enlist their support and promote and sustain results;
11. A sensible and practical interpretation of implementation rules by the contracting authority;
12. Pro-active support and advice from the EUD Task manager to steer the project, foster linkages and ensure follow up.

In both regions, the role of the RTA was considered central to the effective deployment of EU expertise, with the partner administrations often prizing not only the RTA's technical and managerial expertise, but also his/her cultural empathy towards the host country and the ability to build trust and to understand the needs

and constraints of the administration, while bringing fresh perspectives on the issues tackled by the project.

In the best cases, it was felt that Twinning facilitated dialogue within the institution and encouraged beneficiaries to reflect on their work practices, thereby contributing to organisational change beyond the immediate achievement of mandatory results.

Stakeholders found value in both standard Twinning and Twinning light projects, with the former more adapted to demanding reform goals, while the greater simplicity and rapidity of the latter was appreciated to address well-circumscribed needs or to follow up on a standard TP. The Twinning light modality was clearly suited to the EU accession process, as evidenced by the high number of projects implemented in Croatia in the run-up to accession and shortly after, and the fact that only a few Twinning light projects were implemented in the ENI region. There was no evidence of a difference in performance between the two types of Twinning.

Despite widespread support for Twinning, the evaluation has revealed that the interest of both EU MS and PCs in the delivery modality has been declining in recent years. A number of factors explain this trend, among which the budgetary constraints on EU MS public administrations experienced since the 2007-2010 financial and economic crisis certainly play an important role. Geo-political developments during the period have also led EU MS to reconsider their involvement in some countries, where commitments to reforms appear less firm or there is a perceived deterioration in security conditions. Twinning has also faced the competition of alternative peer-to-peer mechanisms, which are increasingly used by the EC to address reform needs of partner countries, including action grants and delegation agreements. While the latter allow greater flexibility in terms of duration and budget, they also tend to dilute the peer-to-peer element present in Twinning, with the cooperation taking place at the level of individual experts rather than institutions. Finally, it appears that the regulatory and institutional framework in some MS' is not ideal for the participation of civil servants in Twinning projects.

Twinning has experienced a relative decline in recent years with fewer calls for proposals and fewer MS applying.

The evaluation also identified obstacles and deficiencies in the mechanism itself, which affected the performance of projects and in some cases may also lie behind the declining uptake.

Looking at the programming and design stages, there appears to be no standard approach to deciding about the best-suited assistance delivery mechanism for supporting reforms in partner countries. The choice of Twinning did not always seem to be based on an extensive analysis of pros and cons with clear criteria to decide whether the mechanism is adapted to the needs and capacities of the beneficiary institution. There is hardly any evidence of institutional capacity assessment being carried out before or at the onset of a project to calibrate the level of support and focus activities on the most pressing needs.

The evaluation revealed a number of shortcomings that affected the performance of Twinning at various stages of the project cycle

Many TPFs were based on a weak intervention logic with mandatory results expressed in broad and vague terms and without robust indicators of achievement. A limited level of consultation of national stakeholders often undermined the quality of projects, causing implementation issues further down the line. Some EU MS argued that their administrations should be more involved in the design of TPs to ensure that the projects were correctly focused and feasible, with realistic mandatory results and achievable targets.

Concerning the selection process, the highly prescriptive TPF template left limited room for EU MSs to propose original solutions. PCs often found they are not best placed to decide between different EU MS systems/models about which they know little. As a result, the selection of Twinning partners tended to reflect historic and cultural relations. While, in theory, calls for proposals are opened to all EU MSs administration, in reality only a few countries apply each time, with rarely more than two or three countries submitting a proposal in the best cases. Some EU MS were

disincentivised to apply, because they found the procedure too demanding and their chances of winning too slim, particularly when competing with a country benefiting from strong geographical, cultural and/or administrative links with the partner country.

While Twinning projects appear to have been generally well managed, the pace of project implementation was often hectic, with overambitious work plans leaving insufficient time for the PC administrations to absorb the expertise received and/or adopt project recommendations. Twinning partners also complained about the lack of flexibility in adding or cancelling activities as circumstances change; constraints in reallocating budget items and the time-consuming identification and approval of STEs; the limited possibility to employ local experts; the lack of preparedness of STEs curtailing the effective duration of missions; and logistic issues, including limits on translation and interpretation and recovery of costs linked to Twinning events. Support from the EU (and in particular the EUDs), both from a management and a strategic point of view, together with a dedicated and pro-active National Contact Point (NCP), were considered essential for generating interest in Twinning and facilitate project implementation. The implementation of projects under indirect management appeared to have been more burdensome given the tendency of contracting authorities to take an overly strict interpretation of rules.

Overall Twinning projects appear effective. Evidence of impact was less easy to capture, especially for complex sectors involving a multiplicity of contributory factors

While most projects reviewed by the evaluation appear to have reached their mandatory results, strengthening the capacities of beneficiary institutions in their specific fields, evidence of long-term impact was more elusive, especially when projects tackled more complex sectors with a wide range of contributory factors outside the scope of intervention, as was the case for revenue collection and administration and anti-corruption projects. In contrast, the impact was more tangible when the beneficiary institution had a well-defined and narrow remit as in the case of projects supporting parliaments or supreme audit institutions. Twinning contributed to socio-economic development when there was a clear commitment to reforms in the partner country, as observed in the energy efficiency project in Ukraine, or a desire to seize the economic benefits of the EU-PC partnership agreement, as in the case of the agriculture project in BiH, where Twinning enabled stakeholders to overcome obstacles linked to the country's fragmented political landscape. These achievements were not always well publicised and disseminated. The evaluation identified a lack of mechanisms to share and capitalise on Twinning results, starting with weak monitoring and evaluation practices.

Twinning achievements were not always well publicised and disseminated

While other interventions were typically referenced explicitly in the TPF, Twinning was usually used as a standalone tool. A combined/sequenced deployment of the available assistance to achieve common specific objectives usually occurred when the Twinning project was part of a comprehensive EU programme of assistance targeting reforms in a specific sector. While TAIEX often helped pave the way for a Twinning project or to follow up on some recommendations, the connection with SIGMA assistance appears to have been very loose.

The evaluation revealed a weak understanding of public administration principles, which were insufficiently applied both at design and implementation stages.

There is evidence that Twinning contributed to more accountable and efficient public administration (e.g. by improving governance and services to citizens), one of the PA principles. There are also examples of implementation problems caused by the insufficient involvement of key reform players, highlighting the importance of another PA principle - policy planning & coordination - for the success and long-term impact of projects. Overall, however, there is limited evidence from the fieldwork that Twinning activities were implemented taking into account the key principles of PA.

The new TM addresses many of the shortcomings identified in this evaluation. However, a majority of stakeholders appear unaware of its innovations or uncertain how to apply them.

The new TM adopted in 2017 after a broad consultation and review process addresses many of the shortcomings highlighted in the evaluation. In addition to simplifying and harmonising implementation rules and approaches across ENI and IPA countries, the TM increases the flexibility and speed of procedures, while putting more emphasis on impact and sustainability, in particular through a more vigorous promotion of public administration principles. Although the feedback on some innovations was not always positive, interviewed stakeholders acknowledged that the implications of the new Manual are not yet fully clear, since the new rules have not yet been tested in all the implementation phases. Moreover, there was a widespread demand for more training and clarifications regarding the TM 2017 to ensure a correct and consistent application of its provisions.

8 CONCLUSIONS

8.1 Introduction

The following conclusions are presented in four clusters: overall performance, impact and results; regulatory framework and institutional set-up; added value, complementarity & coherence and public administration principles; and project design, selection and implementation. Each conclusion is summarised in brief, related to the findings under specific EQs, and described in more detail below.

8.2 Cluster 1: Overall performance, impact and results

Conclusion 1 **Twinning has made a positive contribution to achieving the EU's objectives through effective exchange of public sector expertise**

By harnessing the expertise of the public administration from 24 EU Member States through 521 Twinning projects across 20 partner countries in 2010-2017, Twinning has been largely successful in helping to take forward the EU's enlargement and neighbourhood policies through institution-building.

This conclusion is based on all EQs.

Twinning is a means to an end, and ultimately this end is helping to realise the objectives of the EU's stabilisation, association, partnership and cooperation agreements with partner countries. Since it was launched in 1998, the purpose of Twinning in the enlargement region has been to help pre-accession candidates in preparing for EU membership. Based on the experience of 2010-2017, Twinning continues to fulfil that role by providing access to the most appropriate source of expertise for harmonising with the EU acquis, namely those residing in Member State administrations. In the case of the neighbourhood east and south regions, the EU's policy is to foster the political and economic reform process, and to promote closer economic integration, legal & technical approximation, and sustainable development. Through TPs implemented in 2010-2017, Twinning has helped beneficiary administrations to progress their national reform agendas in line with the priorities of EU-PC agreements, to develop systems that enable them to comply with EU standards and increase market access to facilitate higher levels of socio-economic development.

As the TM makes explicit, Twinning is intended as a tool of institution-building, not an investment vehicle. There are no supplies, works, or grants to NGOs and enterprises. It brings together peer administrations in the same policy area as a conduit for change. In most cases, the exchange of experience and expertise is essentially one-way, from EU MS to PC, but MS interviewees have also reported reciprocal benefits, as they 'brought home' practices developed in the host administration.

Institution-building is a continuous process. Given the evolving socio-economic and policy environment, the EU's acquis and standards/norms provide (regularly-updated) benchmarks for assessing progress and achieving development goals, for example in the context of economic trade, citizen safety and security, environmental protection, and other policy priorities that are important to both the EU and its partners. It should be noted, however, that the selection of Twinning partner(s) is made without any reference to the MS' performance in reaching those benchmarks themselves.

In some cases, the capacity-building of public institutions through TPs might seem marginal, involving 'small steps' that are proportionate to the scale of resources that Twinning can offer. In other cases, the evaluation has found examples of Twinning enabling 'big leaps forward' by bringing together MS expertise with capable and committed PC partners at key moments in the organisation's development.

It should be noted, however, in light of the principles of public administration, that good governance is about more than strengthening the administrative capacity of individual institutions, but also requires a systemic approach (see Conclusion 9).

Conclusion 2 **Twinning is adaptable to contrasting policy contexts**

Twinning has proven to be an adaptable delivery modality, applicable in different sectors as shown by the examples of PFM, RoL and ECG, although with varying degrees of impact.

This conclusion is based mainly on EQs 3, 4 & 5.

The broad sectorial coverage in the 20 partner countries over 2010-2017 shows the flexibility of Twinning as a delivery modality in the context of Conclusion 1. There are few areas of public policy that are not suited to peer-to-peer cooperation, even those where national governments might be wary of sharing access to privileged information or sensitive procedures with public officials from another country, for example in the areas of security, taxation, and anti-corruption. The main exception is defence, unsurprisingly. Otherwise PC administrations appear to be open to cooperation with their MS peers. Twinning is seen as most suitable in sectors in which there are specific or highly technical requirements as regards the EU acquis, such as environment, agriculture, justice and home affairs.

The extent to which this cooperation translates activities into more than just mandatory results and is capable of creating lasting change, varies across policy sectors and Twinning projects.

In the PFM sector, for example, the scope for Twinning to intervene extensively in revenue collection and administration is limited by the sheer scale of the sub-sector, given the diversity of revenue sources and the complexity of tax/customs processes. Hence, the sampled TPs are illustrative in pursuing narrower ambitions, such as strengthening the investigation of criminal tax acts or developing IT applications for internal use by public officials and online access to information by the public. The potential for Twinning to achieve a measurable step-change in actual collected revenue or client satisfaction with taxpayers is minimal, especially in light of other contributory factors. The PFM sector does, however, provide a counter-case. SAIs are similarly sophisticated organisations, but their remit is arguably much narrower than revenue administrations, focused on maximum three types of audit (financial, compliance and/or performance) applied to a finite number of institutions (rather than potentially millions of taxpayers). The sampled SAIs were all relatively young and growing organisations, where Twinning's intervention could offer greater proportionate effects than more mature institutions with already well developed systems and staff.

In the rule of law sector, the picture is similarly mixed. The situation in democratic institutions is comparable to SAIs, in that they are relatively 'standalone' with tightly specified mandates for legislation, regulation and/or oversight, and often young and evolving organisations, meaning that Twinning can achieve more substantial results within relatively short timescales. By contrast, anti-corruption is multi-faceted, the causes and effects are complex and there is no universal consensus concerning solutions. In this context, it is highly improbable that Twinning can make anything other than a marginal contribution to what is a long-term reform process in enlargement and neighbourhood countries.

With ECG, the twinning instrument was favoured by beneficiaries over other modalities e.g. service contracts due to its adaptability, not only in technical terms but also in responding to complex public administration/political environments. Clearly, the peer-to-peer dimension was important but even more so the ability of twinning support to convert technical capacity building support directly into business climate changes. Twinning support to the Agriculture sector in BiH is a good example of this adaptability and suitability. Support resulted in direct business competitiveness improvements and access to EU markets. The EUD and beneficiary institutions in BiH concurred that this success would not have been possible with a service contract. It should be noted, however, that Twinning is only effective if beneficiary institutions have the necessary capacities (particularly staffing) and that it does not start from zero, but builds on previous interventions, with policies and/or regulatory frameworks in place.

Conclusion 3 Diminishing take-up of Twinning raises question about its future relevance, in the context of alternative modalities for peer-to-peer cooperation

Despite widespread satisfaction with Twinning, a decline in the mechanism take-up, particularly among 'old' EU member states, could present an 'existential threat' to Twinning in the face of alternative modalities, such as large-scale technical assistance), action grants under PRAG and delegation agreements (This raises questions about the future relevance of Twinning in the portfolio of enlargement and neighbourhood assistance, and the realism of extending it in ever more countries and contexts outside Europe.

This conclusion is based mainly on EQ 1.

There is a widespread satisfaction with Twinning as a modality among both PCs and EU MSs, based on positive experiences of peer-to-peer cooperation. The main success factors, often repeated, have been the quality of the Twinning team (PL, RTAs, MTE and STEs), the relationship with counterparts, political and managerial commitment, and the positive support afforded by NCPs, EUDs and CFCs.

Despite this feedback from the frontline, the statistics show a story of recent decline. In the last 4-5 years, the number of EU MS responding to these requests has been falling despite a more active participation of ‘new’ MS in the IPA region. The transition of Croatia from PC to EU MS (which reduces the number of potential bidders) provide only a partial explanation. The use of consortiums also limits the potential number of bidders, obviously, but has proven popular with PCs although it has not noticeably increased. The picture is not uniform, as some PCs continue to issue Twinning calls at a largely undiminished rate. However, there does appear to be a general pattern of diminishing interest, which was confirmed by the fieldwork, including an increase in single bids, or nil response and re-launch. The explanatory and contributory factors can be divided into those that are internal and external to Twinning, and also those that are endogenous (within the European Commission’s sphere of influence, by changing the regulatory framework and institutional set-up) and those that are exogenous (either within the sphere of influence of EU MS and PCs, or outside the control of all the partners) (see above Section 6.1, EQ 1 for a detailed presentation of explanatory and contributory factors).

FIGURE 19: EXPLANATORY AND CONTRIBUTORY FACTORS FOR LOWER TWINNING TAKE-UP

	ENDOGENOUS (within EU's sphere of influence)	EXOGENOUS (outside EU's sphere of influence)
Internal (to Twinning)	<ul style="list-style-type: none"> ·Limited timescales and fixed budgets (no scope for cost extension) leading to 'intensive' TPs <hr/> Flat-rate fees below cost-recovery levels for some MS administrations <hr/> Poorly designed TPFs (too many results / components / activities, insufficient understanding of EU acquis, standards or norms / MS competences) <hr/> Prescription of activities in TPF (pre-2017) <hr/> Inability to recover certain cost categories (e.g. in-country travel, foreign travel other than flights, catering for workshops) <hr/> No detailed feedback on why EU MS proposals are rejected <hr/> Deteriorating MS perception of risk-reward based on unavoidable upfront costs (time & resources taken to bid for Twinning versus likelihood and benefits of being selected) <hr/> Over-strict and inconsistent interpretation of TM rules by and across (different) contracting authorities, especially under decentralised / indirect management 	<ul style="list-style-type: none"> EU MS laws, rules and systems that prevent or constrain public officials from participating in Twinning <hr/> Near-monopoly positions taken by some MS administrations in individual countries and sub-sectors as 'repeat winners' <hr/> EU MS administrations without central agencies managing Twinning on their behalf at comparative disadvantage
External (to Twinning)	<ul style="list-style-type: none"> Existence of alternative EU modalities to Twinning that enable peer-to-peer cooperation <hr/> Proportionately lower administration costs against total budget for large TA projects and action grants under PRAG, PAGO DA projects, and (Sector) Budget Support than Twinning 	<ul style="list-style-type: none"> Bilateral funding programmes that enable EU MS to engage in peer-to-peer cooperation with PCs without competition <hr/> Reduction in the size of public administrations in PCs and EU MSs leading to loss of capacity for Twinning <hr/> EU MS focus on domestic priorities <hr/> Perceived weaker commitment to reform in some PCs <hr/> Political instability & perceived lack of personal security in some PCs

One of the consequences of fewer PC calls for proposals and fewer MS responses is that the capacity of individual MS institutions to manage Twinning is being eroded, and that this role is increasingly being taken on by EU MS specialist agencies (e.g. Germany’s GIZ, Expertise France, Spain’s FIIAPP, and Lithuania’s Central Project Management Agency, Austria’s AEI and Finland’s HAUS), which manage projects on behalf of the whole MS administration, from proposal development to contract implementation.

In some of the sampled TPs we have reviewed, the Twinning contract is with the general management body, rather than specific ministries in the MS administration. We recognise that it is difficult for many ministries to manage TPs and hence these management bodies can play a valuable role, but it carries a risk that the TP

will be implemented without the full engagement of the relevant sectoral ministries or agencies. In the field phase, we have seen cases where the latter's involvement in the TP was apparent and other cases where it was less clear. The institution-to-institution link is likely to be strongest where the PL (and RTA for standard Twinning) is a senior official from a relevant MS ministry, and a majority of STEs are drawn from the ministry (or ministries in a consortium), which would signify political / management commitment to the cooperation, increasing the likelihood it will be sustained.

In some TPs, these general management bodies have proven adept at finding MS experts from across several institutions, and sometimes several countries; PC administrations have expressed appreciation in the field phase for MS' willingness to be flexible and find the most suitable experts to fulfil a particular need by looking outside their own administrations / countries (see conclusion 12). It does, nevertheless, involve a movement away from the concept of Twinning as peer-to-peer cooperation between institutions and focus more on the individual experts.

Moreover, many of these general management bodies are able to deliver technical assistance through the whole range of EC delivery mechanisms i.e. under Twinning, delegation agreements, action grants and TA contracts (in the latter case, either in direct competition to private providers or in consortiums with them, although they often then sub-contract to private consultants, including former officials⁸⁴).

Conclusion 4 Twinning is more appropriate when it responds to well-identified operational needs of the host administration in the context of advanced and comprehensive reform processes

Twinning has proven its worth in helping PCs to address operational needs of host administrations in particular when the project is able to build on already existing capacities/frameworks in the context of a wider programme to support reforms in the sector, as well as stimulating dialogue about policy options through peer-to-peer partnerships. However, the short timescales and high intensity of projects, as experienced by PC administrations, are not always ideal both from the point of view of building administrative capacities and achieving the institutional change necessary to reach long-term and more complex reform goals.

This conclusion is based mainly on EQs 1, 3, 4 & 5

Twinning is well-suited to short, targeted interventions, to transfer knowledge and develop operational PC-MS solutions together, and where needed to identify policy options, to specific priorities. However, Twinning has its practical limitations. As has been seen, PC administrations often feel “saturated”, as summed up by one interviewee, by the intensity of the intervention, as capacity is absorbed by managing the TP’s administration. The rules of standard Twinning oblige the RTA to be present throughout the TP’s duration, without the option of a phased withdrawal or time away from the host administration to allow the PC to absorb the knowledge and follow up on recommendations. The rigid timescales allow little time to try and apply the advice, techniques and tools that the TP develops, before the project finishes and the MS partner departs. Moreover, Twinning’s value is undermined by the large time gap between design and implementation despite shorter deadlines for the selection and contracting processes introduced by the new TM. In many cases, part of the TP design was no longer relevant when the implementation started, including where the PC administration could not wait and moved ahead either through their own initiative or with another support.

There is a wealth of evidence that public policy reforms take many years to embed and take effect, especially when they have complex causes, require engagement with multiple actors, and do not have ‘one size fits all’ or ‘silver bullet’ solutions, such as tackling endemic corruption and other systemic challenges that cannot be addressed solely through laws and procedures. Vested interests can be resistant to change and resilient in the face of attempts to reform. These messages can be found, for example, in the World Bank’s 2000 report on “Reforming public institutions and strengthening governance”, the OECD’s 2008 paper on “Managing Change in OECD Governments”⁸⁵, the 2017 World Bank report on “Governance and the Law”, as well as

⁸⁴ For example, Expertise France is a partner in the EUR €3.74 million, 3-year project ‘[Support to the implementation of the Association Agreement and of the National Strategy in the Transport Sector in Ukraine](#)’ led by Dornier Consulting GmbH.

⁸⁵ “Public sector reforms are complex, in many cases unpopular, contested, fraught with risk, and require a long time to produce results and prove their benefits ... They can be supported or opposed by people depending on their point of view; may produce unintended results; may be difficult to implement; may generate the need for further reforms; or simply may not work at all endangering the survival and legitimacy of public organisations and its

country studies such as the 2018 Chatham House research paper, “Rebuilding Ukraine: An Assessment of EU Assistance”⁸⁶, financed by Horizon 2020, and sector studies in PCs such as the 2013 USAID study “Jordan: Rule of Law and Anti-Corruption Assessment” (see case studies, volume II, annex 8). In principle, the introduction of the sector approach to programming in 2014-2020, and the greater emphasis on donor coordination, provides a more robust framework for interventions. Twinning’s typically 6-24 month assignments can contribute towards a longer reform agenda, if carefully designed and executed within a broader, long-term sectorial and institutional strategy.

8.3 Cluster 2: Regulatory framework and institutional set-up

Conclusion 5 **The Twinning framework in the evaluation period was robust, but often considered too rigid by stakeholders, who generally welcomed the simplification and harmonisation introduced in TM 2017.**

Twinning benefited from a robust Twinning regulatory framework, with well-defined roles and rules, but the rigidity of some of the rules, and more critically, the overly strict and excessive interpretation of them by contracting authorities, especially under decentralised / indirect management, has often affected project performance and may partly explain the declining Twinning take-up among EU and PC administrations although civil service laws and employment environment in MS are also contributory factors. This potential for inflexibility was effectively acknowledged in the review that led to TM 2017’s simplification and harmonisation of the rules.

This conclusion is based mainly on EQ 1

Twinning is governed solely by the Financial Regulation, and its interpretation through the Twinning Manual. This has articulated well the roles of NCPs, PLs, RTAs and experts, and set out a transparent process for preparing Twinning fiches, selecting EU MS proposals, and implementing their provisions. This has been subject to review and reflection regularly since Twinning was launched in 1998, including the 2010-2017 period, culminating in the new 2017 TM and its revision in 2018. However, this robustness, and resilience to change, is accompanied by rigidity in several ways, to the detriment of TPs.

First, as Twinning is a form of grant assistance, the amount is locked-in when the agreement is signed. Budgets are based on funding envelopes, rather than estimated costs. There is no prospect of budgetary increase to reflect higher or unforeseen costs, in order to better achieve the objectives through expanded or new activities. There is more latitude around timescale, set out in the TMs governing 2010-2017, which allow for some time extension. However, the combination of inflexible budgets and limited room to lengthen the duration has meant that many TPs have been designed and implemented intensively, trying to squeeze as much as possible into the timespan of the Twinning, leading to over-ambitious work plans with too many mandatory results / components and activities. This has put particular pressure on the PC administration, especially the RTA counterparts, by increasing their workload – managing the Twinning alongside their regular duties. The workload on PC administrations, which arises in part from the desire to extract as much value as possible out of the time-limited and budget-constrained Twinning, allied to staffing cuts in some cases, acts as a disincentive to further TPs, when compared with TA for example which is seen as less intrusive from the PC’s perspective.

The time constraints have been relaxed in TM 2017, with Twinning light extended to 8 months, exceptionally 10 (from the previous 6 and 8), and standard Twinning no longer specifying a time limit, although implying three years (as the maximum duration for an RTA). This demonstrates that Twinning rules can be adjusted, as there is no restriction on those matters in the Financial Regulation, which is the ultimate yardstick for what is and is not possible under Twinning. Whether the extension of time limits is sufficient to release the pressure on PC administrations remains to be seen, as the interviewees are inexperienced in the application of TM 2017 (see Conclusion 6). Furthermore, longer standard TPs might

managerial and political leadership”. O. Huerta Melchor (2008), Managing Change in OECD Governments: An Introductory Framework, OECD Working Papers on Public Governance, No. 12, OECD publishing.

⁸⁶ “At the micro level, much of the EU’s support is in the form of technical assistance projects [including Twinning (page 11)]. These can be effective in transferring specific technical knowledge and skills, but their narrow focus and short time scales are far less beneficial for institution-building”. By contrast, the study cited the benefits of the EU championing a more strategic approach that embraces whole sectors and coordination with various donors. “The sector-based approach allows for a comprehensive strategy - from capacity-building to policy implementation - that is more effective than isolated and sporadic interventions aimed at single state institutions or policy measures ... The sectoral approach also requires strong coordination with other international donors that seek to support the same sectors”.

not be conceivable for MS, unless there is more flexibility in deploying the RTAs, so that they are not required to be present full-time throughout the assignment.

Second, the TM rules are largely clear on many matters, but there are inevitably open questions in places. The issue here is less about rigidity in the regulatory framework, but rather in its implementation. As PC and MS administrations have highlighted, and even CFCEs themselves, there have been cases of contracting authorities taking an overly strict interpretation and ‘gold-plating’ the TM’s provisions, placing obstacles in the way of TP execution and deterring some EU MS from Twinning⁸⁷. Furthermore, different contracting authorities have conflicting perspectives on these rules, which creates uncertainty and extra workload among MS administrations that are active in more than one PC.

Third, there is a perception among some MS administrations that they face an excessive level of controls by contracting authorities, given their status as MS (and hence subject to shared management for other EU monies, such as Structural Funds). This reflects the application of rules governing action grants in the FR that were designed more with NGOs in mind.

Fourth, financial restrictions in the TMs appear to act as a disincentive on both the EU MS and PC sides in different ways, according to feedback during the evaluation. In some cases, this might be due to misconceptions or lack of awareness about what can and cannot be covered by the TM’s provisions⁸⁸, and in others, it might be because of over-strict interpretation by contracting authorities, as noted above. As the Twinning is financed through a grant to the MS, it covers just costs to the PC administration when beneficiary PC officials participate in activities outside the PC (e.g. study visits to the MS), whereas interviewed PC administrations reported challenges in financing their in-country costs, such as travel, accommodation and catering at workshops. For the MS administrations, the main cause of concern is the costs they feel are not covered by the TP budget. Under TM 2009 and TM 2012, these indirect costs were covered by the Twinning management costs compensation of 150% of all fees included in the budget for short and medium-term expertise (including fees for MS PL)⁸⁹. Under TM 2017, the MS administration receives compensation through the 6% flat rate (of total eligible direct costs) for “indirect costs”⁹⁰, plus “Twinning project support costs”, which are financed at 136% of the €350 flat rate daily allowance for STEs⁹¹. Given all the management and overhead items that must be financed from these compensatory allowances, the *perception* is that there is little headroom to cover the home-based time spent by MS experts on preparing for missions or addressing questions from PC counterparts. For some MS administrations, especially those with higher salary levels, the TM 2017 flat rate fee of €350 for experts, even with the additional 136%, is seen as making Twinning cost-ineffective. In these cases, EU MS have stated that they can no longer afford to participate in Twinning as they are not able to cover their costs. It was also highlighted by some PCs that Twinning only covers the costs of MS experts, not the PC officials whose time is involved intensively.

Some of these factors are not under the jurisdiction of the EU, but rather the regulatory framework and institutional set-up in the Member States themselves. In some countries, there are barriers in the path of public officials that create problems for their participation in Twinning, such as having to use their holiday entitlement or take unpaid leave to act as STEs on TPs, taxation on allowances, etc. There are also comparative (dis)advantages across MS, which reflect their different levels of development. The newer MS

⁸⁷ In at least one case, an MS administration has been so negatively affected by the CFCE’s application of the TM, to the point where delayed payments forced it to cancel activities ‘back home’, that the head of the institution has directed the organisation to no longer apply for Twinning in that particular PC and to consider carefully in the future whether to operate in countries where Twinning is under indirect management.

⁸⁸ For example, one issue raised was the inability to cover international travel costs other than flights, whereas other options (car, train) are acceptable, subject to conditions.

⁸⁹ “For tasks performed outside the BC for the benefit of the Twinning project by MS civil servants or mandated body experts, the financial contribution to the home administration or mandated body will be the Twinning management costs compensation detailed under section 5.8”. (TM 2009, section 5.4). “For work performed in the MS for the benefit of the Twinning project, the MS receives a financial contribution in the form of Twinning management costs compensation as detailed under section 5.8”. (TM 2012, section 5.4). According to section 5.8 of both TMs, the budget must not include expert or any other fees corresponding to work performed outside the BC, no matter what its nature, including preparation or follow-up of mission, accompaniment of study visit, delivery of seminars, coordination, logistical management (accounts) overheads or any other incidental costs.

⁹⁰ This covers “costs related to time devoted to support the drafting of interim and final reports; other costs such as training provided to officials, office space and equipment, human resources management, general management and administrative costs of the Member state grantee linked, among other things, to accounting or book-keeping or invoicing” (TM 2017, section 3.11)

⁹¹ Note, the €350 flat rate daily allowance for STEs is supplemented by an extra 136% to compensate for “TP Support Costs” under TM2017. As the TM makes clear, “Twinning does not remunerate the experts mobilised, but compensates the Member State administration which, for certain periods of time, cannot expect that its officials perform the work for which it pays them”. This is paid for each day of work in the PC, and this 136% covers “other eligible costs”, which includes time spent by officials preparing and following up their missions in the PC; time spent by the MS PL coordinating project implementation from his/her home administration without being seconded from his/her post; time spent and other costs incurred for the delivery of activities during study visits of PC officials or agents in a MS; time devoted to logistical arrangements necessary for the organisation of activities in the PC (section 3.10).

tend to have less costly RTAs and can therefore direct more of the fixed budget envelope to offering more STE days, which distorts the competition between MS. As a remedy, some older MSs have been proposing RTAs from newer MS.

For many MS administrations, however, the balance of risk and return in bidding for Twinning is not favourable, as the upfront costs are fixed, namely the time and resources to prepare a proposal, to find an RTA candidate (in the case of standard Twinning) and a replacement during his or her time on the TP. This remains the case, despite the 'lighter' process of preparing the proposal for standard Twinning under TM 2017, as the MS administration no longer needs to commit to a detailed work plan. In principle, the reduction in numbers of likely bidders should improve the risk-reward calculation in favour of the remaining MS, but there remains a sense that certain MS administrations have taken a dominant position in some sectors and countries (e.g. FR in Maghreb countries, IT in anti-corruption in the Western Balkans, HU in parliamentary TPs, DK in statistics, etc.), whatever the reality might be, and hence there is no point in trying to compete. In these cases, the best chance is seen as participating as junior partner in a consortium led by the dominant player.

There is also the comparative element, namely that PC administrations and EUDs are opting to select alternative modalities (see Conclusion 3) at the programming stage that involve proportionately lower administrative costs and less complexity than Twinning, and hence some MS administrations are drawn more towards these opportunities, which are also more flexible and cost-effective (as the teams involve a mix of MS public officials and staff from the PC).

Conclusion 6 The 2017 Twinning Manual is a step in the right direction, but it is too soon to evaluate its effects

TM 2017 has already sought to address many of the concerns and constraints identified by the European Commission, MS' and PCs in the evaluation period, by placing the emphasis on results and simplifying and harmonising project management. It is too early to say whether the improvements in the TM since 2017 will arrest the decline in take-up. However, it is clear that stakeholders remain insufficiently acquainted with the changes introduced by the new TM.

This conclusion is based mainly on EQ 1.

The 2017 Twinning Manual was subject to extensive review and widespread consultation, and sought to address perceived deficiencies by simplifying the rules, to ensure a more uniform application of the regulatory framework in both enlargement and neighbourhood regions, and to strengthen the impact of Twinning by introducing the principles of public administration (see Conclusion 10).

The online survey found that more than 75% of respondents had not yet used TM 2017. Hence, it is too early to speculate about the effects of the changes, and whether and how it will affect behaviour.

The picture that emerged from the field phase was mixed. Interviewees in some PCs indicated that they were aware of the provisions of the TM, thanks to the workshops of DG NEAR's TAIEX and Twinning Unit, and the briefing and training activities of EUDs, CFCEs and NCPs. In other PCs, just a few stakeholders were familiar with the changes introduced and wanted more information and training.

In general, there has been widespread support for TM 2017's simplified arrangements, with some exceptions and caveats.

First, the streamlining of expert fee rates from three bands, reflecting varying levels of seniority, to just one (€350), is seen as a disincentive to participation by several MS (see Conclusion 5).

Second, the emphasis on achieving results is also widely welcomed, but there have been conflicting reactions to the new provision that standard Twinning fiches no longer include detailed activities and MS proposals no longer require detailed work plans, the proposed plans will be provisional, rather than hardwired into the Twinning contract, and will be firmed up in the inception phase as rolling plans that will be revised during the TP's duration. This is appreciated by the MS administrations, and many PCs too, as it reduces preparation time and allows the work programme to be jointly planned, in the spirit of partnership that should underpin Twinning. However, some PCs would prefer to continue detailing activities in advance in the TP fiche, in order to retain control over the MS plans in much the same way as TA projects. Some MS have argued that this often remains the case *de facto*, where TP fiches lay down prescriptive indicators which allow very limited room to manoeuvre to achieve the mandatory results. There are also valid concerns, when TPs start close to the end of the fiscal year, about the effect of shifting TP work planning from the

proposal to the inception phase. This creates challenges for PCs with annual budgeting, as the administration is unable to budget ahead for PC costs (e.g. workshops, in-country travel) when it does not know which activities will take place.

Third, there is concern that TM 2017 creates a discrepancy between standard Twinning and Twinning light, as the latter still requires PCs to set out detailed activities in the TP fiche, and MS administrations to commit to work plans in their proposals and contracts. This is understandable, given Twinning light is maximum 10 months, and hence the Twinning team is expected to ‘hit the ground running’, but it means that unfortunately there is no easing of the process of proposal preparation, compared with standard Twinning.

8.4 Cluster 3: Added value, complementarity & coherence and public administration principles

Conclusion 7 Twinning adds value in its niche role, but most PCs and EUDs lack a system for weighing up its pros and cons against other options

Twinning fulfils a niche role in the portfolio of EU assistance to enlargement or neighbourhood regions, adding value through peer-to-peer cooperation, especially when it is clearly linked to EU acquis or standards/norms, but most PCs lack a systematic framework for selecting Twinning over other modalities.

This conclusion is based mainly on EQs 1 & 2.

Twinning has proven its value within its parameters, as set out in the TMs (see Conclusion 1). It fulfils a particular role in the portfolio of EU assistance in enlargement and neighbourhood regions, which is distinguishable from other delivery modes. As a form of peer-to-peer cooperation between public administrations, lasting 6-8 or 24-36 months (2010-2017), Twinning adds most value when it is targeted on EU acquis or standards / norms, as reflected in the objective, mandatory results and activities.

Given the options available in partner countries, which include SIGMA assessments and assistance, TAIEX workshops and missions (including strategic TAIEX), the procurement of services (technical assistance) and supplies, and the agreement of (sector) budget support, it is essential to have clarity on the strengths and weaknesses of each modality, and its applicability in different scenarios, in order to make a sound selection, either individually or in combination (see Conclusion 9).

Under EQ2, the report sets out a rationale for Twinning relative to TA that builds on the criteria in the TM, whereby Twinning is either the ‘superior option’ (where the public sector has a specific competence not found in the private sector, or the legislative environment is specialised and evolving, or subject to change for a defined period, that public officials are better placed to proffer advice, assistance and training) or the ‘preferable option’ (where expertise might also reside in the private sector, but public officials have more relevant insights due to the political and operational environment). During the field phase, interviewees made the compelling argument that, unlike TA, the PC can benefit from access to the whole MS institution, not just the individual members of the Twinning team (PL, RTA, MTEs and/or STEs), with regards to its systems, procedures and *modus operandi*, strengthening further the ‘preferable option’ justification.

In practice, however, it appears rare for the PC and European Commission to make a systematic analysis of the pros and cons of Twinning against other options during the programming process. In some cases, there has been an edict from a higher political or managerial level to “use more Twinning”, which has just as quickly been dropped or reversed. There are examples of TPs where the PC administration has requested TA as the modality and been instructed to use Twinning, and vice versa, but without a clear explanation of the reasoning. In other instances, the PC has specifically requested Twinning, based on past positive experiences, without discussion around the alternatives.

Exceptionally, there are examples of PCs where the arguments in favour of different modalities is subject to evaluation grids to assess and rank Twinning proposals.

Furthermore, the field phase found that the decision to finance TPs sometimes favoured those experienced beneficiaries with the capacity and inclination to ‘make the case’ for Twinning, while other potential priorities under the EU-PC agreements might be overlooked in the absence of an advocate and ready host administration for them.

Conclusion 8 Twinning complements other modalities and vice versa, but explicit coordination is less common

While Twinning has its own distinct specificities, and hence there seems to be no overlap in the parameters of Twinning with other EU delivery mechanisms (TAIEX, SIGMA, delegation agreements under indirect management, action grants, budget support and technical assistance), there is complementarity, but less often overt coordination, i.e. a combined / sequenced deployment of assistance to achieve common specific objectives.

This conclusion is based mainly on EQ 2.

Each of the delivery modes available to PCs with EU financial assistance has specific characteristics, which make the case for applying them in certain circumstances. They also complement each other. For example, TAIEX is appropriate for short expert missions, which can give PC administrations a ‘taste’ of what a longer peer-to-peer cooperation might offer, especially Twinning. Many Twinning projects include ‘elements’ that could be provided under other modalities, the most obvious being study visits to MS administrations, which exist on a standalone basis under TAIEX, and are also integrated into TA contracts. Some Twinning components could be delivered by TA contracts, such as legal analysis, IT development, communication strategies and promotional activities. Nevertheless, there is little direct overlap in the delivery modes’ design.⁹²

The evaluation found examples of complementary modalities being applied in concert with each other. For example, Twinning projects use the MS-PC knowledge of the administrative environment, and set the overall framework for TA (such as the Croatian TP in the PFM case study on developing IT applications for tax administration). However, these tend to be the exception rather than the rule. Many PC administrations have benefited over time from TAIEX, SIGMA and TA, as well as Twinning, often concurrently. There are examples of the modalities being combined in an overall programming strategy, but this is relatively rare.

Moreover, while sector budget support (SBS) is sometimes combined with service contracts, for example to support monitoring of the SBS performance indicators and/or to ensure communication and visibility, there are rare instances of PCs seizing the opportunity to blend SBS with Twinning, (e.g. Albania in the sectors of PFM, PAR and anti-corruption) to assist the PC administration to realise SBS objectives and achieve expected results, although this is encouraged by the SBS guidance.

Conclusion 9 There is limited awareness of public administration principles and a demand for more guidance on how to apply them in the context of Twinning

While Twinning contributed in some cases to more accountable and efficient public administration (e.g. by improving governance and services to citizens), the application of the principles of public administration was weak, which sometimes undermined the impact and sustainability of TP results. This should change as the effects of the new TM are felt, but stakeholders appear unaware of how to put the principles into practice.

This conclusion is based mainly on EQ 2.

The review of Twinning in 2010-2017 has shown that some TPs have improved accountability and transparency, by giving policy and services more visibility and engaging with citizens and businesses. They have strengthened public services in design and delivery. These achievements align with the principles of public administration, which were developed first for the enlargement region, before being extended to the neighbourhood countries. However, there were other aspects of the principles of public administration where there was limited evidence of applicability, (e.g. use of the better regulation approach, inter-ministerial coordination, public consultation, government-wide HRM systems, coordinated training, interoperable IT development, etc.) More positively, these principles and practices have now been given due prominence in TM 2017.

In attempting to assess the impact of Twinning, the evaluation team has been conscious of the underlying logic of the principles of public administration and the advice of DG NEAR’s CoTE on PAR. For example, the adoption of new legislation does not necessarily imply progress, if the law has been drafted in haste, without a rigorous impact assessment or consultation, and benefitting special interests. In principle, the benefit of Twinning is that the peer-to-peer partnership should encourage the application of good practice,

⁹² Note, SIGMA cancelled the study visit element of their assistance, to avoid duplicating TAIEX and focus resources elsewhere

so that such deficiencies are ironed out of the system, and this is now explicit in TM 2017⁹³, although there is also the counter-case that the short TP timescales might encourage corner-cutting. The evaluation has found no *prima facie* evidence that Twinning has ‘set back’ institutional development, or placed it on a path which might be deleterious to reform, for example by treating symptoms but reinforcing underlying causes, although this cannot be conclusively ruled out, of course.

The online survey found that nearly 70% of PCs’ and MSs’ respondents were not aware of the principles of public administration. It is not surprising, then, that they also responded that they did not know how to take them into account when developing and implementing a Twinning project.

This response resonates with the findings of the desk phase and feedback during the field phase. Among those few interviewees who are applying TM 2017 to new TPs, there is a perception that the principles are something that is applied to the whole of government, not to individual institutions or specific projects.

It is too early to say whether and how these principles will be applied, but it appears clear that PC administrations in both enlargement and neighbourhood regions will need further advice, guidance and training, with practical examples, to increase the likelihood that they will be integrated with Twinning and other forms of intervention.

8.5 Cluster 4: Project design, selection and implementation

Conclusion 10 The quality of Twinning project design is affected by insufficient assessment, consultation and dialogue, and weak intervention logic.

The design of TPs was undermined by insufficient inputs from external expertise and stakeholders, including line DGs and Member States, not always taking full account of absorption capacity in the PC, and flawed intervention logic. The TM 2017 emphasis on results rather than activities, and the clarification that ‘mandatory results’ means concrete operational results, which should be expressed in measurable terms, are both helpful and appropriate given the MS-PC partnership is pivotal to Twinning, and the resources and timescale available.

This conclusion is based mainly on EQs 1, 3, 4 & 5.

Once Twinning is chosen as the modality to meet an institution’s objective within the programming process, the actual design of the Twinning project itself commences. The beneficiary PC administration was responsible for preparing the TPF, although in practice other parties were often involved, including the PC institution that leads on programming IPA / ENI funds, the EUD and CFCE under decentralised management. Sometimes, the drafting of the TPF was sub-contracted to private consultants.

The case for consulting local stakeholders depends on the nature and scope of the TP, but is strongest where achieving the mandatory results requires horizontal or vertical cooperation, for example in justice, border management, revenue collection and administration. The extent to which this consultation occurred seems to vary. As noted under EQ1, the success of Twinning requires sufficient absorption and implementation capacity in the beneficiary PC administration, but this is not always assessed and can adversely affect project performance.

Given Twinning tends to focus on EU acquis, norms and standards, the line DGs in the European Commission also have a part to play in informing project design. Interviews with a sample of DGs reveal a divergence of approaches. In some cases, involvement is relatively passive, limited to checking whether the TP looks broadly fine and contains no glaring errors, by taking the view that the EUD will know the situation ‘on the ground’ better and will already have screened the TPF. In others, the DGs take a very active interest in the TP, even prior to TP design at the programming stage (steering PCs towards Twinning as the preferred modality), as well as commenting on draft TPFs, and following progress with TP implementation through EU-PC mechanisms of policy dialogue. There is no consistent pattern across DGs. We found no evidence of extensive consultations with other multilateral or bilateral donors leading to a coordinated deployment of assistance.

⁹³ “Any legislation (especially alignment of legislation with the Union acquis), organisational structures, procedures and job profiles developed in the framework of the Twinning project will need to be developed in an inclusive and evidence-based process, involving both internal and external stakeholders, and on the basis of best possible evidence (impact assessments)”. TM 2017, section 2.1.1

At present, Member States are involved to some extent in the programming of EU funds, which include decision about priorities (where to direct resources) and modalities (how to direct them), largely through consultation between the EU/PC and MS embassies, although this varies in the level of engagement and the extent to which embassies refer back to their home administrations and line ministries. However, once a decision is taken to proceed with Twinning as the delivery mode, the MS' are excluded from the process of Twinning Fiche preparation, at least formally, as the selection of MS partners is intended to be competitive. Some MS are able to influence design informally, through their involvement in Twinning or TAIEX missions immediately preceding the new TP. What was clear from the MS interviews, however, is that they were frustrated at the lack of engagement in TP design, given the expertise in harmonising with EU acquis and applying EU standards & norms resides with the MS.

The findings of the online survey suggest that the vast majority of respondents were satisfied with the quality of the intervention logic in TPs. The desk review has found, however, that the connection between TP purpose, overall objective, mandatory results, indicators and activities is often loose and lacking in coherence, rather than cascading from one level to the next. A flawed intervention logic undermines the TP's focus, its influence on impact, and the likelihood of its sustainability.

The centrepiece of TP design, laid down in every Twinning Manual, is the achievement of mandatory results. Under both the 2009 and 2012 TMs that applied to the TPs under this evaluation, the term "mandatory result" was not defined, only described as a "concrete operational result ... in connection with the EU acquis or other EU policies open for co-operation" and as the "achievement of the Twinning project". This created some ambiguity. Mandatory results were often formulated as objectives, while the measurable indicators were expressed largely as outputs and occasionally as outcomes. Given the limited resources and timescales of each TP, it is helpful that TM 2017 has provided clarification with the new formulation, "mandatory results/outputs", which are defined specifically in the glossary as "direct products of the intervention (of activities of the Twinning in this case)". TM 2017 also requires that the TP's final report should account for the "influence on impacts" of the mandatory results/outputs (section 5.5.3). Hence, there should still be a theory of change that underpins each TP.

Conclusion 11 Lower interest from MS administrations and a lack of information about MSs' systems undermined the process of matching PC needs with MS expertise.

Member States compete for Twinning projects in line with the TM, which interprets the provisions of the Financial Regulation. In practice, the statistics are showing increasingly limited interest, with a growth of solo or zero bids and a near-monopoly in some countries and sectors. The current application and selection process appeared sub-optimal for defining PC's needs and matching them with MS expertise, given the calls for proposals are generating fewer applications and PCs often lack reference points (MS performance in these policy areas) to make an informed judgement on MS applications.

This conclusion is based mainly on EQ 1.

At present, MS administrations respond either individually or in consortiums to calls for proposals, with eight weeks up to the submission deadline to form partnerships, find suitable experts (and their replacements) and prepare proposals. The diminishing response from MS administrations hinders the offer to PCs, as there is increasingly only one bid, or no bids at all. PCs interviewed during the field phase were largely satisfied with the support they received from the selected team, even when there was no choice. However, it suggests that the opportunity to match PC needs with MS expertise is not being maximised. Some MS administrations are effectively gaining presence in certain countries and/or sectors, as potential competitors decide it is not worth wasting eight weeks of valuable time with the high probability of disappointment, which they must then explain to their senior management or ministers, and drop out of the field.

As a form of grant assistance to PCs, the governance of Twinning is ultimately guided by the provisions and limitations of the Financial Regulation (FR)⁹⁴. Unlike the PRAG approach to grant management (which

⁹⁴ The introduction to the 2018 FR reiterates the long-standing principle that "grants should be awarded following a call for proposals. Where exceptions are allowed, they should be interpreted and applied restrictively in terms of scope and duration. The exceptional possibility to award grants without a call for proposals to bodies with a de facto or de jure monopoly should only be used where the bodies concerned are the only ones capable of implementing the relevant types of activities or have been vested with such a monopoly by law or by a public authority". While de facto monopolies are being created in some policy areas under Twinning, it is clearly not the intention of the FR to reinforce and reward them.

applies to external actions i.e. third country beneficiaries, but is also used for action grants to MS public and mandated bodies), the TM has opted for an application and selection process which resembles more closely the PRAG approach to service contracts⁹⁵. The TPF follows the same format as a TA terms of reference⁹⁶, and the MS' respond with a proposal⁹⁷. This is a matter of choice, and weighing up pros and cons.

In accordance with the FR, the exclusion of MS administrations from the preparation of TPFs, in order to ensure the integrity of competition, means they have no input into identifying the PC's potential institution-building needs (see Conclusion 10).

In practice, competition has been limited, especially prior to TM 2017, given that the activities were pre-determined, and the budget was set (and hence applicants were not competing on price), leaving only the experience of the PL, RTAs (for standard Twinning), MTEs and STEs as the factors on which MS could distinguish themselves from the competition. The only 'cost competition' occurred when MS with lower salaries offered additional activities, beyond those set out in the TPF, as an inducement. In practice, many PCs appear to have relied on the interviews with MS applicants to determine suitability of the Twinning team, and which revealed (negatively) poor language / communication skills or (positively) a level of empathy and understanding which made the team a good fit with the PC's expectations. As already noted under Conclusion 3, MS administrations (especially those that pass the pillar assessment) have easier and/or more flexible routes to peer-to-peer cooperation, where the risk-reward calculation is more favourable⁹⁸.

Furthermore, PCs often lack knowledge about which EU MS' have the 'best' or at least most relevant systems, standards and norms and/or have recent experience in approximating their legislation.

Conclusion 12 Opportunities are not being maximised to extract full value from Twinning's achievements, during and after project implementation.

Twinning achievements are not sufficiently capitalised, publicised and disseminated. This starts with inadequate monitoring of ongoing TP performance (basic data and ROM missions), and lack of follow-up of completed projects to assess the achievement of mandatory results and other effects, as well as sporadic country evaluations. It also reflects low-key promotion and low visibility of Twinning, especially in PCs where there is not a coordinated campaign to promote the EU-MS-PC partnership that is integral to Twinning, and the lack of effective exchange tools to highlight inspiring practices and results.

This conclusion is based mainly on EQs 1, 3, 4 & 5

At present, there is insufficient monitoring and evaluation of Twinning projects, which is holding back capitalisation and lessons learned.

There is no comprehensive and accurate database of Twinning projects, accessible to DG NEAR, line DGs, EUDs, CFCEs and other stakeholders.

Reports from results-oriented monitoring (ROM) provide more insights into Twinning implementation than the TFRs, but do not achieve universal coverage, and take place just once, which can be near the beginning, middle or end of the TP. Some of the ROM reports highlight the weak intervention logic in the TPFs, which reinforces the finding of this evaluation (see Conclusion 10), and also undermines the ability to monitor and evaluate Twinning.

The TRMs are potentially useful for checking whether the mandatory results have been achieved, in light of assessments made in the TFRs, as they occur six months after the end of the TP, but just around 10% of TPs have been subject to TRMs to date. Even six months is too soon in some cases to assess whether the full effect of Twinning has been realised, particularly where recommendations in the TFRs involve extensive preparatory work, or the timeframes for decision-making and implementation are long, such as developing, adopting, implementing and enforcing legislation. Six months is certainly too soon to confirm the impact and sustainability of TPs, except insofar as it might reveal whether peer-to-peer cooperation has led to any

⁹⁵ Under the TM's interpretation of the FR, MS' respond to calls for proposals prepared by the PCs in the form of terms of reference (like service contracts), rather than guidelines for applicants (like action grants). They submit proposals (like service contracts) rather than the two-stage process of short concept notes and, if approved, full applications (like action grants).

⁹⁶ Rather than the standard guidelines for applicants for action grants.

⁹⁷ Instead of a concept note and full application, as per action grants.

⁹⁸ For those public or mandated bodies that have passed the pillar assessment, PAGoDA indirect management can be achieved without competition (direct contracting with a pillar-assessed MS public or mandated body is permitted under FRs Article 154 and 157, suitably justified) and with the opportunity to identify needs and define their own action programme. The calls for proposals for action grants also affords MS public and mandated bodies more scope for creativity in designing solutions to meet the PC's objectives and expected results, conceptually and in full, which the PC can then assess through the two-stage evaluation.

lasting relationships between the partner administrations and other stakeholders (PC-PC and PC-MS), as evidenced by joint agreements, activities or assistance subsequent to the TP.

The evaluation has also found very few country evaluations, and where they exist, little evidence that their findings have been shared across the regions.

There is also relatively little exchange of Twinning experience, regarding projects in the same sector/covering similar topics. Moreover, the field phase revealed that there is a demand for more contacts and dialogues between projects, irrespective of the sector, about common administrative and management issues and inspiring practices such as expert searches beyond the MS consortium and investing time in preparing STEs prior to the mission.

As an example, the Croatian Ministry of Justice's project on further strengthening of probation services is a shining example of how to engage expertise from different Member States, how to ensure STEs are well-prepared for their missions, and how to use Twinning to pilot new techniques in the pursuit of policy imperatives, in this case the electronic monitoring of ex-offenders to reduce the prison population.⁹⁹

At the moment, Twinning is characterised by relatively low-key promotional activities, such as: the DG NEAR webpage; 'Twinning News', which includes several short descriptions of success stories, but which has reduced in frequency since the 2000s (from seven editions in 2008 to just one-two a year from 2014); the annual Institution Building Days (IBDs); and ad hoc missions and other events. The EU's role in Twinning has poor visibility in some countries, especially in Neighbourhood South region, where the MS-PC partnership is publicised and the EU gets insufficient credit.

Potential exchange tools are under-utilised, such as the Twinning Community Tools operated by DG NEAR under CIRCAB. The main conduits for experience are the individual MS administrations and their experts, who can relay practices and lessons learned from one project to another. The PC National Contact Points are also familiar with the range of TPs in their own countries, but not necessarily the detail, and this intelligence is lost if the NCP is replaced. EC line DGs receive little feedback about Twinning achievements. There is no systematic capitalisation of Twinning's achievements, either to try and replicate successful processes or to draw attention to the merits of Twinning as a modality.

This appears to be a missed opportunity. While not every TP can be a beacon for others, the experience of reviewing TPs and interviewing participants has revealed many illuminating examples of inspiring projects, which could influence public administrations on both sides, PCs and EU MS'.

⁹⁹ On the first point in particular, the TP was awarded to a consortium with Spain as the lead MS partner and Germany as the junior MS partner, but the implementation of the TP drew on experts from other MS, including a renowned Romanian law professor as the junior MS project leader, and a Belgian former head of the probation service in charge of the component on electronic monitoring.

9 RECOMMENDATIONS

9.1 Introduction

The following recommendations are presented in three clusters: regulatory framework and institutional set-up; added value, complementarity & coherence and public administration principles; and project design, selection and implementation. Each recommendation is summarised in brief, related to the conclusions presented in the previous section, and described in more detail below. Table 2 below presents the links between evaluation questions, conclusions and recommendations.

TABLE 2: LINKS BETWEEN EVALUATION QUESTIONS, CONCLUSIONS AND RECOMMENDATIONS

Evaluation Questions (EQ)	Conclusions	Recommendations
EQ's 1,3,4 & 5 EQ's 3, 4 & 5 EQ 1 EQ's 1,3,4 & 5	<p>Cluster 1: Overall performance, impact and results</p> <p>C1: Twinning has made a positive contribution to achieving the EU's objectives</p> <p>C2: Twinning is adaptable to contrasting policy contexts</p> <p>C3: Diminishing take-up of Twinning raises question about its future relevance, in the context of alternative modalities for peer-to-peer cooperation</p> <p>C4: Twinning is suitable for targeted and technical interventions, but less suited to achieving long-term reform goals</p>	<p>Cluster 1: Regulatory framework and institutional set-up</p> <p>R1: Increase awareness and understanding of the provisions of TM 2017 (C5, C6 & C10)</p> <p>R2: Address Member State barriers to officials' involvement in Twinning (C3)</p> <p>R3: Reinforce European Commission's capacities to manage Twinning (C6 & C7)</p>
EQ 1 EQ 1	<p>Cluster 2: Regulatory framework and institutional set-up</p> <p>C5: The Twinning framework in the evaluation period was robust, but often considered too rigid by stakeholders, who generally welcomed the simplification and harmonisation introduced in TM 2017</p> <p>C6: The 2017 Twinning Manual is a step in the right direction, but it is too soon to evaluate its effects</p>	<p>Cluster 2: Added value, complementarity and coherence</p> <p>R4: Optimise Twinning's synergies with other modalities to strengthen its contribution to realizing long-term reform goals (C7 & 8)</p> <p>R5: Provide support to PCs in applying the SIGMA principles (C9)</p>
EQs 1 & 2 EQ 2 EQ 2	<p>Cluster 3: Added value, complementarity and coherence</p> <p>C7: Twinning adds value in its niche role, but most PCs lack a system for weighing up its pros and cons against other options</p> <p>C8: Twinning complements other modalities and vice versa, but explicit coordination is exceptional</p> <p>C9: There is limited awareness of public administration principles and a demand for more guidance on how to apply them in the context of Twinning</p>	<p>Cluster 3: Project design, selection and implementation</p> <p>R6: Help PCs improve the quality of Twinning project design (C3 & C10)</p> <p>R7: Promote EU benchmarking tools to PC administrations (C11)</p> <p>R8: Encourage consortiums and exchange of expertise across TPs (C11)</p> <p>R9: Build a comprehensive management information system (MIS) (C12)</p>
EQs 1, 3, 4 & 5 EQ 1 EQs 1, 3, 4 & 5	<p>Cluster 4: Project design, selection and implementation</p> <p>C10: The quality of Twinning project design is affected by insufficient assessment, consultation and dialogue, and weak intervention logic.</p> <p>C11: The current selection and contracting process is sub-optimal for matching PC needs with MS expertise.</p> <p>C12: Opportunities are not being maximised to extract full value from Twinning's achievements, during and after project implementation</p>	<p>R10: Capitalise the results of Twinning and promote exchange of inspiring practices (C12)</p> <p>R11: Improve visibility of Twinning and the EU's role (C12)</p> <p>R12: Review Twinning in 2020 and consider the merits of more radical scenarios to increase Twinning relevance and effectiveness in matching PC needs with MS public sector expertise and ensure the future of the mechanism (C3, C5 & C6)</p>

Table 3 below provides an overview of the level of priority in terms of importance of the recommendations and the urgency of their realisation with 1 being lowest and 5 being highest. Assigning 1 to a recommendation does not indicate *unimportance* but a lower level of priority than other recommendations.

TABLE 3: LEVEL OF PRIORITY IN TERMS OF IMPORTANCE OF THE RECOMMENDATIONS AND THE URGENCY OF THEIR REALISATION.

No.	Recommendation	Importance	Urgency
1	Increase awareness and understanding of the provisions of TM 2017	5	5
2	Address Member State barriers to officials' involvement in Twinning	4	3
3	Reinforce European Commission's capacities to manage Twinning	5	4
4	Optimise Twinning's synergies with other modalities to strengthen its contribution to realizing long-term reform goals	4	3
5	Provide support to PCs in applying the principles of public administration	3	5
6	Help PCs improve the quality of Twinning project design	4	4
7	Promote EU benchmarking tools to PC administrations	3	3
8	Encourage consortiums and exchange of expertise across TPs	3	3
9	Build a comprehensive management information system (MIS)	3	2
10	Capitalise the results of Twinning and promote exchange of inspiring practices	3	2
11	Improve visibility of Twinning and the EU's role	3	3
12	Review Twinning's state of play in 2021 and explore the merits of alternative scenarios which would strengthen the interest of MS administrations and their engagement in Twinning, thereby increasing Twinning relevance and effectiveness in matching PC needs with MS public sector expertise	2	3

9.2 Cluster 1: Regulatory framework and institutional set-up

Recommendation 1: Increase awareness and understanding of the provisions of TM 2017

<p><i>Guide, train and support EUDs (especially contracting units) and MS and PC administrations (particularly CFCEs and PAOs) that are still coming to terms with the new TM, as they gain more experience in preparing and implementing TPs under its guidance, including on the effects of the 2018 update; address the divergent understanding of how to interpret TM provisions, particularly in PCs operating under indirect management, with regard to requesting extra information beyond the TM's provisions or disallowing practices that are not explicitly forbidden by the TM (or more essentially, by the Financial Regulation); and make the most of the network of NCPs.</i></p>	
<p><i>This recommendation is mainly linked to:</i></p> <ul style="list-style-type: none"> • Conclusion 5 on the Twinning framework, which indicates that overly strict, excessive and sometimes incorrect interpretation of TM rules in the past has affected project performance and has acted as a disincentive to future participation; • Conclusion 6 on the impact of TM 2017, which indicates that the vast majority of survey respondents had not yet used the new TM, and while the simplified arrangements were widely welcomed, there remained some open questions and concerns; and • Conclusion 10 on quality of project design, which indicates that the intervention logic is flawed in many TPs, but TM 2017 has usefully clarified the meaning of mandatory results as outputs, and the expectation that TPs will have an “influence on impacts”. 	
<p><i>Main implementation responsibility:</i> DG NEAR’s IB, TAIEX & Twinning Unit, EUDs, NCPs, PAOs, CFCEs</p>	
<p>What works and should continue?</p>	
<p>The widely-appreciated initial briefings and training provided by DG NEAR’s IB, TAIEX & Twinning Unit when TM 2017 was launched should be built upon.</p>	
<p>DG NEAR’s ongoing advice regarding the interpretation and application of TM 2017 in response to <i>ad hoc</i> enquiries should continue, alongside the measures set out below.</p>	
<p>What should be strengthened?</p>	<p>How should this be done?</p>
<p>Systematic and ongoing support should be provided (particularly to the contracting authorities, with a specific focus on EUDs, CFCEs, and PAOs), to help them to address issues arising from early experience of TM 2017 implementation and tackle the ‘gold-plating’ of TM rules identified in the evaluation.</p>	<p>DG NEAR should organise further workshops/training, ideally in the PCs themselves, but otherwise as a Brussels-based event, to reiterate key messages around the TM, and provide Q&A regarding specific provisions.</p>
<p>Existing and new mechanisms should be utilised to enable EU MS and PC administrations to learn from each other, as well as the EC, on a continual basis, as they apply TM 2017 increasingly to new TPs.</p>	<p>DG NEAR developing a web-based ‘community of practice’, potentially using capacity4dev as the platform with the agreement of DG DEVCO, so that both PCs and MS administrations can ‘Ask NEAR’ about specific provisions and their interpretation, possibly on an anonymised basis if the issues are sensitive.</p> <p>DG NEAR should also nurture and use the network of NCPs in PCs, EUDs and EU MSs, and the EUDs themselves to spread information and clarifications, and identify and share any inconsistent, excessive and interpretations of TM provisions.</p>

Recommendation 2: Address Member State barriers to officials' involvement in Twinning

<i>Improve MS legal and institutional environment for Twinning removing barriers for the active participation of civil servants in Twinning projects and other peer-to-peer cooperation.</i>	
<i>This recommendation is mainly linked to:</i>	
<ul style="list-style-type: none"> • Conclusion 5 on the Twinning framework, which indicates that the legal and institutional environment in some Member States acts as an obstacle to mobilising public sector expertise in Twinning and other forms of peer-to-peer cooperation. 	
<i>Main implementation responsibility: MS administrations</i>	
What works and should continue?	
Some MS' administrations have adopted a more favourable legal and operational framework for facilitating peer-to-peer cooperation using public sector expertise, which allows, for example STE missions by civil servants / public officials to be considered business trips (or otherwise parts of their duties) and to receive the Twinning daily allowance.	
What should be strengthened?	How should this be done?
MS administrations should address blockages in civil service laws, rules and procedures that currently prevent or deter public officials from participating in Twinning (as well as other forms of peer-to-peer cooperation)	The MS' centres of government should consider introducing specific "Twinning" laws (as has happened in Germany, Slovenia and Latvia) or procedural mechanisms to ensure: missions to PCs are considered as part of public duties, so they are not limited either entirely or to a maximum number of days per year; accidents abroad are covered; there are adequate financial incentives, such as flat rate fees and per diem allowances paid to the public officials, or salaries topped-up, rather than retained by the public administration or subjected to double taxation; and years of public service experience abroad are taken into account in the career development system.
All key MS stakeholders should act as advocates for Twinning across their home administrations.	NCPs and foreign ministries / embassies should pro-actively encourage their home administrations to see Twinning as an opportunity for both personal development and career advancement of staff, as well as the chance to build institutional relationships with PC administrations. They should also emphasise the potential for Twinning grants to be used to replace key experts and preserve the overall staff complement.

Recommendation 3: Reinforce European Commission's capacities to manage Twinning

<i>Increase the staffing of the Twinning element of the IB, TAIEX and Twinning Unit, and ensure the relevant EC Twinning stakeholders (EUD Twinning coordinators, DG NEAR CoTEs¹⁰⁰) have sufficient resources, so that they can carry out current duties plus the recommendations contained in this report.</i>
<i>This recommendation is mainly linked to:</i>
<ul style="list-style-type: none"> • Conclusion 6 on the impact of TM 2017, which indicates that PCs (including CFCEs and NCPs), EU MSs and EUDs still have questions and concerns on the TM, as they gain experience with implementation, which will ensure an ongoing stream of requests to the Twinning team for clarification, and possibly missions to PCs; • Conclusion 9 on applying good governance principles, which indicates that Twinning stakeholders were unaware of the principles of public administration and how to take them into account in developing and implementing TPs, and hence further support from the CoTEs will be necessary, as they are likely to also receive requests for clarification; and • Conclusion 12 on extracting full value from Twinning's achievements, which indicates the need to develop a more comprehensive information system and increase the number of TRMs to 100%

¹⁰⁰ CoTE on PAR, CoTE on Rule of Law, Fundamental Rights & Democracy, CoTE on Economic Governance, CoTE on Crisis Reaction and Security Sector Reform, CoTE on Migration, CoTE on Civil Society Support, CoTE on Connectivity / Networks, Environment & Regional Development

of new projects in line with TM 2017 (see recommendation 9), and complete the coverage of country evaluations, and share intelligence within and across countries (see recommendation 10).	
<i>Main implementation responsibility:</i> DG NEAR senior management, EUD management	
What works and should continue?	
The existence of a dedicated Institution-Building, TAIEX and Twinning Unit, with a specific Twinning team, is a valuable central source of knowledge and guidance for Twinning stakeholders.	
The establishment of the Centres of Thematic Expertise has created focal points within DG NEAR as the conduits of sectorial intelligence in key policy areas, benefitting not only DG NEAR, but also other Commission Services and EUDs.	
The presence of Twinning coordinators ¹⁰¹ in EUDs acts as an interface between DG NEAR and the (other) EUD programme / task managers, PC NCPs and other stakeholders (e.g. CFCEs, Embassies), and particularly as an in-country source on Twinning principles, rules and experiences.	
The involvement of the line DGs in receiving and commenting on draft TPFs makes a valuable contribution to ensuring that the proposed TPs are relevant and well-designed, especially in relation to EU acquis, standards and norms in their sectors, and ensuring complementarity / avoiding duplication and overlap with other planned and ongoing interventions (see also recommendation 6). In some cases, the line DGs also follow the progress of the active TPs through their engagement in the PCs (e.g. through policy dialogue and informal contacts with PLs and RTAs), which should be encouraged and extended.	
What should be strengthened?	How should this be done?
The staffing of the Twinning team should be increased, both to manage the current workload and to take forward the recommendations of this evaluation.	DG NEAR's leadership should perform a functional and workload analysis to assess the right level and mix of staff in the IB, TAIEX and Twinning Unit to provide the policy direction of Twinning, and oversight of its implementation, including guidance, monitoring, capitalisation and dissemination of lessons learned. Considerations should also be given to the demarcation of responsibilities within DG NEAR to ensure better links between public administration reform and institution building, which are split between two different directorates (Directorate A and C respectively). <i>See also recommendation 1 and recommendations 4-12.</i>
The specialist guidance role of the CoTEs, bringing together topical knowledge with awareness of the geo-political context and administrative culture in enlargement and neighbourhood regions, should be maintained and reinforced.	DG NEAR's leadership should assess, and increase as necessary, the resource levels of the CoTEs, given they cover policy fields where the reform process can take many years to achieve substantive change, such as strengthening the quality of public administration and the rule of law. <i>See also Recommendations 5-7.</i>
EUDs should raise the capacities of programme managers / Twinning managers / Twinning coordinators, as applicable within the EUD's structure, to steer Twinning strategically in their countries.	This could be achieved through tailoring job profiles and/or job specifications to focus on quality control and effective coordination across sectors, and additional training. This should cover, in particular: developing their understanding and promotion of the results-based orientation and simplified rules in TM 2017 (<i>see Recommendation 1</i>); developing processes (e.g. grids) to assess Twinning systematically against other options (and vice versa) and to integrate Twinning with other modalities within the sector approach (<i>see Recommendation 4</i>); enhancing their capacities to interpret and apply the principles of public administration (<i>see Recommendation 5</i>) and to check rigorously that the TPF intervention logic is sound (<i>see recommendation 6</i>); using the comprehensive Management Information System

¹⁰¹ As a position, irrespective of the precise job title

	(MIS) (<i>see Recommendation 9</i>) to capitalise Twinning practices and achievements (<i>Recommendation 10</i>); and raising the visibility of Twinning and the EU's role (<i>Recommendation 11</i>).
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9.3 Cluster 2: Added value, complementarity & coherence and public administration principles

Recommendation 4: Optimise Twinning's synergies with other modalities to strengthen its contribution to realising long-term reform goals

<i>Promote a strategic approach to Twinning, by ensuring that Twinning is embedded in more extensive and long-term sector programmes as the framework for coordination with other modalities (SIGMA, TAIEX, (S)BS, technical assistance, delegation agreements and action grants) to maximise its added value.</i>	
<i>This recommendation is mainly linked to:</i>	
<ul style="list-style-type: none"> • Conclusion 7 on Twinning's niche role in the portfolio of EU assistance, which indicates that there is an implicit rationale for Twinning, but most PCs lack a systematic framework for selecting Twinning over other delivery modes; and • Conclusion 8 on Twinning's complementarity with other modalities, which indicates that there is rarely overt coordination, in the form of combined or sequenced deployment to achieve common objectives. 	
<i>Main implementation responsibility: DG NEAR, EUDs, PC institutions responsible for IPA and ENI programming</i>	
What works and should continue?	
The use of evaluation grids by some PCs when programming IPA and ENI enables them to weigh up the pros and cons of Twinning as a modality for each intervention and decide whether it is the most appropriate mechanism given the strategic / reform context and the operational conditions.	
The use of the sector approach to programming IPA and ENI should take a medium-long term perspective, particularly in policy areas where the reform process is complex and transformation takes time (e.g. public governance, anti-corruption, judiciary).	
What should be strengthened?	How should this be done?
The use of evaluation grids, or an equivalent system, should be mainstreamed, so that it is a common and consistent practice in IPA and ENI programming in all PCs.	DG NEAR should issue methodological instructions to EUDs, and programming coordinators in the IPA and ENI regions (NIPACs, PAOs, etc.), on assessing the merits of Twinning against other modalities, based on the characterisation of superior and preferable options for Twinning in conclusion 7, alongside the criteria ¹⁰² in the Commission's 2011 evaluation ¹⁰³ as a starting point to decide whether the PC administration is ready for Twinning.
The abovementioned evaluation grids and methodology for deciding systematically whether Twinning is the most suitable delivery mode, should be fully integrated into the sector approach.	DG NEAR should issue instructions on programming IPA and ENI, either within an existing framework (e.g. "Guidelines on linking planning/programming, monitoring and evaluation", first issued in July 2016) or separately, to ensure that Twinning assistance is deployed where it is most appropriate in medium-long term sector strategies, to play a complementary role within an overall portfolio of interventions that will deliver institutional

¹⁰² There were six criteria: 1. Is the beneficiary organisation already legally established? 2. Has the role and mandate of the beneficiary organisation clearly been laid down through act(s) of law? 3. Has the beneficiary organisation (either with or without external support) already made a decision on the manner in which it intends to realise the (part of the) acquis which is subject of the assignment? 4. Is there sufficient political and/or public support for the above? 5. Is management (not the political level, political change is inevitable in a democracy) of the beneficiary organisation stable, and not likely to change soon and/or frequently (e.g. under influence of elections)? 6. Does the organisation avail of sufficient capacity to handle the 'burden of twinning?' a. sufficient staff, able to communicate with the twinning experts; b. sufficient and appropriate office accommodation; c. IT capacity; d. relevant management is willing and able to spare time for the twinning, i.e. participation in trainings, discussions etc.?

¹⁰³ Ecorys (2011), "Evaluation on Twinning versus Technical Assistance", client: DG Enlargement

	capacity-building and reform objectives, in line with EU-PC agreements. Furthermore, the EUD should ensure the participation of Twinning Coordinators (or equivalent) in the programming exercise within sector working groups.
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Recommendation 5: Provide support to PCs in applying the principles of public administration

<i>Provide further advice, guidance and training on the principles of public administration in TPs, particularly in the programming of Twinning and preparation of TPFs with intensive assistance, and verifying that the principles are applied in actuality to ensure that TPs are connected to PCs' ongoing reform efforts and enhance the impact and sustainability of project results.</i>	
<i>This recommendation is mainly linked to:</i>	
<ul style="list-style-type: none"> • Conclusion 9 on applying good governance principles, which indicates that Twinning stakeholders were unaware of the principles and how to take them into account in developing and implementing TPs. 	
<i>Main implementation responsibility:</i> DG NEAR's IB, TAIEX and Twinning Unit, CoTE on PAR, line DGs, EUDs.	
What works and should continue?	
The guidance on the principles of public administration for enlargement and neighbourhood countries, prepared by SIGMA with the European Commission, continues to provide a valuable framework.	
The integration of the principles into TM 2017 guidance and training should be maintained (see also Recommendation 1).	
DG NEAR's CoTE on PAR should continue to present the principles at Institution-Building Days and other forums, to reach the target audience, remind them of the principles' importance, and enable them to raise questions about the principles' application.	
What should be strengthened?	How should this be done?
DG NEAR's current investment in awareness-raising and training on the principles of public administration in EUDs and PC administrations should be extended to other countries in both regions.	In addition to explanatory briefings, especially those by the CoTE on Public Administration Reform, including a presentation at the Institution-Building Day in February 2018, DG NEAR is currently implementing a framework contract (FWC SIEA 2018) on 'mainstreaming of key principles of public administration in sector policy work and EU financial assistance' ¹⁰⁴ . The FWC covers the Western Balkans enlargement countries and Georgia, Moldova and Ukraine, including 1-day awareness-raising and training workshops in each PC. Following the FWC's completion, DG NEAR should undertake a similar initiative in Turkey in the enlargement region and the other neighbourhood PCs.
DG NEAR's programme awareness-raising and training workshops through the FWC should be followed up with hand-holding help.	The EUDs should disseminate the materials to relevant public institutions in each beneficiary country, especially those that were unable to participate in the workshops. Furthermore, the EUDs and NCPs, backed up by the CoTE on PAR, should initiate follow-up events (roundtables, workshops, etc.) with the bodies responsible for programming IPA and ENI, as well as individual PC administrations preparing and implementing TPs, to support them in taking on board the principles in practice.

¹⁰⁴ EuropeAid/138778/DH/SER/Multi. The FWC is scheduled to run from January 2019 for 12 months, and has three specific objectives: raising awareness on the relevance of the principles and ongoing PAR efforts for all sectors among DG NEAR, EUDs and beneficiary institutions; providing practical training on how PAR mainstreaming can be done in practice in different sectors; and developing a repository of relevant documents (guidelines, notes, presentations) for DG NEAR's intranet. It will draw upon SIGMA's toolkit for the preparation, implementation, monitoring, reporting and evaluation of public administration reform and sector strategies.

The European Commission should verify that TPs are taking account of the principles in their design and implementation.	The EUD in the first instance should vet each TPF, followed by DG NEAR and line DGs, to ensure the principles are rigorously followed. The implementation of the principles should be built into the template for ROM missions and TRMs.
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9.4 Cluster 3: Project design, selection and implementation

Recommendation 6: Help PCs improve the quality of Twinning project design

<i>In the context of TM 2017, supporting PC administrations to increase the relevance of Twinning projects to the EU-PC agreements, and the theory of change underpinning them, to strengthen the TP's focus, elevate its influence on impacts, and improve the likelihood of its sustainability.</i>	
<i>This recommendation is mainly linked to:</i>	
<ul style="list-style-type: none"> • Conclusion 3 on diminishing take-up of Twinning, which indicates that poorly designed TPFs are an explanatory factor, especially where there are too many results, components or activities, and the project design shows insufficient understanding of the relevant acquis, standards or norms; • Conclusion 10 on quality of project design, which indicates that the intervention logic is flawed in many TPs, but TM 2017 has usefully clarified the meaning of mandatory results as outputs, and the expectation that TPs will have an “influence on impacts”. 	
<i>Main implementation responsibility:</i> DG NEAR's IB, TAIEX and Twinning Unit, CoTEs, line DGs, EUDs, NCPs from PCs	
What works and should continue?	
The quality control of draft TPFs, which involves NCPs, EUDs, DG NEAR and line DGs, enables different aspects of TP design to be checked and fed back to the PC administration, but could be strengthened to improve the project's relevance to the acquis, standard and norms, intervention logic, synergies with other interventions within wider sector strategies (<i>see recommendation 4</i>) and alignment with the principles of public administration (<i>see recommendation 5</i>).	
The ROM missions should continue to identify any flaws in intervention logic, so that they can be highlighted with EUDs and the PC administrations.	
What should be strengthened?	How should this be done?
All relevant CoTEs and line DGs (at an earlier stage than present) should provide inputs during the preparation of TPFs, to check whether they are fully aligned with EU acquis, standards and norms.	This will require effective coordination with EUDs and DG NEAR's Twinning team, so that TPFs are circulated to the CoTEs and line DGs at a sufficiently early stage that they can check the relevance, quality and likely impact of activities - in the context of the sector, applicable EU acquis, and principles of public administration - and feedback their findings with enough time for the PC administrations to address any concerns. <i>See also recommendation 10.</i>
EUD and NCPs should check consistently that the intervention logic is robust and coherent before submitting TPFs to DG NEAR, and after the PCs have received feedback from relevant CoTEs and line DGs.	DG NEAR's Twinning team should provide additional training to NCPs, EUDs and PCs on intervention logic, in line with the 2016 Guidelines on linking planning / programming, monitoring and evaluation. <i>See also recommendation 1.</i>

Recommendation 7: Promote EU benchmarking tools to PC administrations

<i>Assemble and promote existing EU benchmarking tools and studies to guide PC administrations in their choice of MS partners.</i>	
<i>This recommendation is mainly linked to:</i>	
<ul style="list-style-type: none"> • Conclusion 11 on application and selection of MS, which indicates that the lack of sufficient interest from Member states administrations undermines the process of matching PC needs with MS expertise. 	
<i>Main implementation responsibility: DG NEAR's IB, TAIEX and Twinning Unit, CoTEs, line DGs</i>	
What works and should continue?	
Not applicable – this is a new proposal.	
What should be strengthened?	How should this be done?
PC administrations should utilise all the available contextual information that they can access in evaluating the submitted proposals in front of them, and selecting the most suitable MS partner for their TP.	<p>DG NEAR's Twinning team should request from each CoTEs and relevant line DG that they identify benchmarking and other studies within their spheres of operation, which assess MS' performance and progress against various criteria, including the harmonisation, implementation and enforcement of EU acquis and norms/standards, such as the <u>EU Justice Scoreboard</u>, the <u>Single Market Scoreboard</u>, which includes market openness / trade in goods and services and public procurement <i>inter alia</i>, and the findings of the <u>European Public Administration Country Knowledge (EUPACK)</u>. This request should be repeated every 6 months to ensure that the Twinning team has access to the most up-to-date information.</p> <p>The Twinning team should then assemble the EC benchmarking tools and studies and signpost EUDs and NCP in the PCs towards them.</p>

Recommendation 8: Encourage consortiums and exchange of expertise across TPs

<i>Broaden the perspectives of PC administrations by encouraging consortia of MS, despite the higher upfront 'costs' (time taken to find partners and prepare the proposal) and consider enabling projects to transfer experience from one PC to another by allowing study visits to PCs and bringing in civil servants/experts who were involved in a similar project, either to share experience or even provide short-term advice.</i>	
<i>This recommendation is mainly linked to:</i>	
<ul style="list-style-type: none"> • Conclusion 11 on application and selection of MS partners, which indicates that the process is sub-optimal in matching PC needs with MS expertise; • Conclusion 12 on opportunities not being maximised to extract full value from Twinning, which highlights the scope to engage expertise from different Member States. 	
<i>Main implementation responsibility: DG NEAR's IB, TAIEX & Twinning Unit, EUDs, PC administrations</i>	
What works and should continue?	
The use of EU MS consortiums to deliver Twinning projects should continue and, furthermore, DG NEAR's Twinning team and EUDs should explicitly encourage the PC administrations to make clear in the TPF that they would welcome a consortium approach.	
The practice of offering observer status on the project steering committee to RTAs from other TPs in the same country should be maintained and pursued more systematically across all PCs.	
Multi-country events, such as TAIEX seminars and FISCALIS 2020, should continue to open up opportunities for PC administrations to meet their counterparts in other enlargement and neighbourhood countries, as well as MS administrations.	

What should be strengthened?	How should this be done?
The exchange of expertise across TPs in the same PC should be enhanced.	EUD Twinning coordinators should formalise contacts and networking between TPs, by organising regular (e.g. quarterly) round tables in the EUD for all PLs / RTAs and relevant programme managers for their sectors, where they can find out about each other's project activities.
The exchange of expertise across TPs in different PCs should be enabled.	<p>DG NEAR should allow and encourage Twinning teams to conduct study visits to other PCs (not just MS), so they can see the results of successful TPs and meet and discuss with the PC counterparts there.</p> <p>Beneficiary PC administrations should encourage the selected MS / consortium to recruit STEs from other MS' who have implemented well-performing TPs in other countries with relevant experience, as well as those from their home administrations that are crucial to building the institutional relationship.</p> <p><i>See also recommendation 10.</i></p>

Recommendation 9: Build a comprehensive management information system (MIS)

<i>Ensure the Twinning community, especially DG NEAR, line DGs, EUDs, CFCEs and NCPs, have access to information and intelligence on the performance of Twinning, and promote monitoring and evaluation practices, including (but not only) by means of TRMs.</i>	
<i>This recommendation is mainly linked to:</i>	
<ul style="list-style-type: none"> • Conclusion 12 on extracting full value from Twinning's achievements, which indicates a lack of complete data on Twinning projects and only partial coverage of ROM missions, TRM reports and country evaluations. 	
<i>Main implementation responsibility:</i> DG NEAR's IB, TAIEX & Twinning Unit, EUDs, network of NCPs	
What works and should continue?	
The requirement in TM 2017 that all TPs should be subject to Twinning Review Missions (TRMs) should be enforced by EUDs, but DG NEAR should consider introducing TRMs for Twinning light projects and extending the 'earliest date' for TRMs to 12 months to increase the probability of capturing outcomes and impact, as well as confirming the achievement and sustainability of mandatory results and their sustainability.	
The practice of commissioning country evaluations should be extended, so that all enlargement and neighbourhood countries have been covered at the conclusion of the 2014-2020 financial perspective.	
What should be strengthened?	How should this be done?
DG NEAR should develop a web-based MIS, accessible by key stakeholders to facilitate exchange of project information, monitoring, evaluation and capitalisation of Twinning results.	<p>DG NEAR should first develop a comprehensive web-based information database of TPs, structured so that it can be interrogated by country, sector and sub-sector, with access to key project documentation (TPF, contracts, reports, ROM, TRM, evaluation) and contact details (including EUD Twinning Coordinator and PC's NCPs).</p> <p>This would provide the foundation for a monitoring system, to enable the EUDs to track all TFR recommendations of existing (ongoing) and future TPs, and to follow up these TPs to see if their objectives and mandatory results have, in fact, been achieved (as claimed by TFRs) and whether the mandatory results create sustainable assets, as required by the TM.</p>

	<p>DG NEAR and EUDs should ensure that the TP database and tracking system are continually updated, and linked to the <u>EVAL</u> module and the Operational Information System (<u>OPSYS</u>), which is shared by DG NEAR, DG DEVCO and the service for Foreign Policy Instrument (FPI)¹⁰⁵.</p> <p><i>See also Recommendation 10.</i></p>
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Recommendation 10: Capitalise the results of Twinning and promote exchange of inspiring practices

<p><i>Make more effective use of lessons learned from recent and ongoing Twinning projects, using the comprehensive MIS (see 0), to avoid duplication of activity (projects in the same sector, covering similar topics with overlapping timescales which could usefully learn lessons from each other, by sharing and comparing approaches, and drawing on prepared methodologies and curricula), generate interest in designing new TPs to replicate or follow-up their successes (by highlighting actual outputs and outcomes), and help stakeholders to interpret TM rules creatively to make best use of resources, irrespective of the sector.</i></p>	
<p><i>This recommendation is mainly linked to:</i></p> <ul style="list-style-type: none"> • Conclusion 1 on Twinning’s positive contribution to achieving EU objectives, which noted that MS interviewees have reported benefits from ‘bringing home’ practices developed in the host administration; • Conclusion 12 on extracting full value from Twinning’s achievements, which indicates there is relatively little exchange of Twinning experience across projects and countries, regarding information on individual projects, their practices and performance. 	
<p><i>Main implementation responsibility:</i> DG NEAR’s IB, TAIEX & Twinning Unit, EUDs, network of NCPs</p>	
<p>What works and should continue?</p>	
<p>The Commission’s <i>Twining webpage</i> should be continually maintained as an accessible central locus of information, including the Twinning newsletters that contain useful information, short success stories, and the lessons learned and good practices from TRMs.</p>	
<p>What should be strengthened?</p>	<p>How should this be done?</p>
<p>EUDs should identify and disseminate inspiring practices and achievements in ongoing and recent TPs, to add value to the plans and activities of PC administrations.</p>	<p>EUDs should first identify innovative approaches and success stories by drawing upon their ROM reports, TRM reports, TFRs and other sources (including the NCPs), and flagging these cases with DG NEAR, so that they can be assessed as prospective subjects for profiling and promotion (<i>see recommendation 11</i>), and the ‘network of NCPs’ from PC administrations, so that they can draw attention to them among potential beneficiary administrations.</p> <p><i>In order to capture the benefits to MSs, DG NEAR should consider amending the TFR template to invite the MS side to record any developments, underway or planned, in their home administrations arising from practices developed in the host administration during the TP.</i></p> <p><i>When it is developed, DG NEAR should ensure that the TP database and tracking system (see 0) can be accessed online by all EUDs and CFCEs in enlargement and neighbourhood regions, every NCP, and all relevant line DGs.</i></p>

¹⁰⁵ The EVAL module and OPSYS are shared by DG NEAR, DG DEVCO and the service for Foreign Policy Instrument (FPI). The EVAL module is a database and IT tool facilitating the management of evaluations and the dissemination of evaluation results. OPSYS is a one-stop shop IT platform, which gives a single access to the entire cycle of external action data including programming and action documents, legal decisions, and contracting figures, as well as information on procurement, results and other monitoring indicators.

	<p>EUDs, along with PC NCPs, should also foster contacts between ongoing projects to discuss common administrative and management issues and exchange inspiring practices that can facilitate implementation and enhance results. (By way of illustration, the example under conclusion 5 from Croatia shows a flexibility of thinking that could be showcased and spread among the actual and prospective Twinning community).</p> <p><i>See also Recommendation 8.</i></p>
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Recommendation 11: Improve visibility of Twinning and the EU’s role

<p><i>Raise the profile of Twinning among EU MS, PCs and stakeholders, to elicit greater interest and recognition, including EU’s profile (in particular in the South).</i></p>	
<p><i>This recommendation is mainly linked to:</i></p> <ul style="list-style-type: none"> • Conclusion 12 on extracting full value from Twinning’s achievements, which indicates the Twinning has been characterised by low-key promotional activities and poor visibility in some countries, especially in Neighbourhood South. 	
<p><i>Main implementation responsibility:</i> DG NEAR’s IB, TAIEX & Twinning Unit, EUDs, MS’ NCPs</p>	
<p>What works and should continue?</p>	
<p>The Commission’s <i>Twinning webpage</i> should be continually maintained as an accessible central locus of information, including the Twinning newsletters that contain useful information, short success stories, and the lessons learned and good practices from TRMs.</p>	
What should be strengthened?	How should this be done?
<p>DG NEAR should use EUD’s inspiring practices and successes stories to increase the profile among MSs and PCs.</p>	<p>DG NEAR should prepare publicity materials around selected Twinning case studies, which can be used both online as short eye-catching profiles in Twinning News and as standalone 1-page hand-outs to sell the benefits of Twinning.</p> <p>Inter alia, MS’ NCPs should utilise these inspirational materials, including those promoting the benefits to MS themselves, to promote Twinning at the national and sub-national levels in their home administrations.</p>
<p>EUDs should ensure the EU’s role in Twinning is well recognised among both the administration and population of PCs.</p>	<p>EUDs should ensure that all TPs follow the EU’s visual identity guidelines, including preparing a communication and visibility plan at the outset of the project in line with TM 2017, (see section 5.7), agreed by the two PLs and approved by the EUD, promote the contribution of the EU throughout the TP (not just at the launch and closure events), and communicate activities and benefits to key stakeholders and the wider public, which will require close cooperation with the Twinning partners and also DG NEAR. The EUDs should include Twinning in the communication and visibility strategies, and wider media promotional programmes (e.g. looking at the example of the EUD in Ukraine, which has developed communication strategies and campaigns to publicise the EU’s involvement in the reform agenda).</p>

Recommendation 12: Review Twinning’s state of play in 2021 and explore the merits of alternative scenarios which would strengthen the interest of MS administrations and their engagement in Twinning, thereby increasing Twinning relevance and effectiveness in matching PC needs with MS public sector expertise. Such a review is essential to ensure the future of the mechanism, particularly in the context of a possible geographical extension of Twinning beyond the enlargement and neighbourhood regions.

Conduct a review of Twinning’s state of play, and specifically the new TM after three years of implementation, especially in the context of considerations of possible geographical extension of Twinning beyond the enlargement and neighbourhood regions in 2021-2027, spreading existing capacity in EU public sector expertise more thinly; explore scenarios which would encourage interest and engage more MS administrations, bringing their expertise to bear on identifying institution-building needs and proposing creative solutions at the post-programming TP design stage, while reinforcing the PC-MS partnership principle from the earliest possible moment, compatible with the FR’s provisions on grants; consider greater flexibility in TP implementation, building on the changes in TM 2017, so that standard Twinning becomes more manageable for PCs and EU MSs and more effective for administrative capacity-building.

This recommendation is mainly linked to:

- **Conclusion 3 on diminishing take-up of Twinning**, which indicates that there are explanatory factors which are internal to Twinning and endogenous (within the European Commission’s sphere of influence);
- **Conclusion 5 on Twinning framework**, which indicates that the Twinning rules and procedures (under previous TMs) might be contributory factors to diminishing take-up by MS and PCs; and
- **Conclusion 6 on the impact of TM 2017**, which indicates that it is too soon to assess its effects.

Main implementation responsibility: DG NEAR’s IB, TAIEX & Twinning Unit

What works and should continue?

Not applicable.

What should be strengthened?

How should this be done?

<p>DG NEAR should consider ways in which Twinning can be made more relevant to the needs of MSs and PCs, and thereby enhance its take-up as a modality in the context of multi-mode sector strategies and long term reform agendas.</p>	<p>DG NEAR should commission a policy review of Twinning rather than a full evaluation, by organising roundtables with CoTEs, line DGs, EUDs, NCPs from both EU MS' and PC, CFCEs, and a sample of PC and MS administrations with experiences of preparing and implementing TPs under TM 2017. The policy review should produce concrete recommendations to adjust the TM and/or take more far-reaching steps, including potentially:</p> <ul style="list-style-type: none"> • Pre-competitive ‘calls for interest and ideas’ by Member States, which would allow them to express their interest in the TP (alerting PCs to potential bidders beyond the usual applicants), and to propose relevant and innovative approaches that, if attractive to the PC, could be integrated into the TPFs sent out by PCs and subject to competitive bidding¹⁰⁶; • An approach to competitive proposals that is closer to the standard ‘action grant’ approach of the PRAG, based on guidelines for applicants to propose their vision of how the PCs’ project objective could be met, and subject to a concept note (which could be the basis of an alternative mechanism to the ‘call for interest and ideas’) followed by full application; • Revised Twinning parameters that permit projects to spread their activities over a longer and less intensive time period, to allow time for the PC to absorb the lessons learned, and, without the full-time / permanent presence of RTAs (mixing characteristics of standard and light TW), possibly by phasing the RTA’s inputs out before the TP is completed, and/or allowing the TP to ‘pause’ while the PC adjusts and adapts their policies and practices, and/or allowing the EU MS to employ an in-country project manager to relieve RTA of organisational duties to focus on the advisory role, and/or budgeting for a follow-up session by the EU MS up to 12 months after the TP to provide “after-care” on TFR recommendations; and • Exploring the scope for a dedicated Twinning regulation and/or amendment to the Financial Regulation, to recognise the specificities of Twinning to improve flexibility, including the possibility to increase the budget to reflect higher or unforeseen costs, in order to better achieve the objectives through expanded or new activities.
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¹⁰⁶ In some MS, public authorities (for example, DFID) make an initial announcement of their intention to seek consultancy services, setting out the overall aims and an outline of the project that will be subject to competitive tender, and invite feedback from potential providers as to whether it is viable or other approaches might be more appropriate. The public authority then collects this feedback, consider its plans further, refines them where it sees best, and issues an open call for proposals.