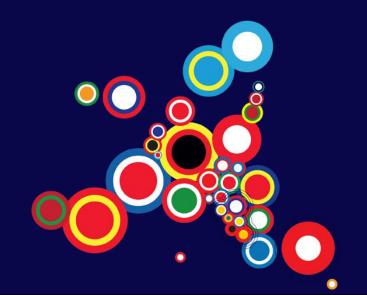


INSTRUMENT FOR PRE-ACCESSION ASSISTANCE (IPA II) 2014-2020

TURKEY

Support for negotiating Chapters 11 and 13



Action summary

The main aim of the action is to contribute to Turkey's accession by supporting alignment with EU legislation in the field of agriculture and rural development, and to enhance the institutional capacity of Ministry of Food Agriculture and Livestock (MoFAL) to implement the requirements of relevant EU legislation in Turkey within the scope of Chapter 11: Agriculture and rural development and Chapter 13: Fisheries

In order to achieve the aim, three activities are supported under this action, which are: (i) Capacity Building for Fisheries Producer Organisations and Provincial Agricultural Directorates in line with CMO of CFP, (ii) Strengthening Implementation Capacity of Risk Management and Control Activities of Agriculture and Rural Development Support Institution (ARDSI) and (iii) Farm Accountancy Data Network (FADN): Target 2020.

Action Identification			
Action Programme Title	Annual Action Programme for Turkey (2016)		
Action Title	Support for Negotiating Chapters 11 and 13		
Action ID	IPA/2016/ 039-355/7/Turkey/Agriculture		
	Sector Information		
IPA II Sector	Agriculture and Rural Development		
DAC Sector	31191 - Agricultural services		
	Budget		
Total cost	4 400 000 €		
EU contribution	4 400 000 €		
Budget line(s)	BGUE-B2016-22.020302-C1-NEAR		
	Management and Implementation		
Management mode	Indirect management		
National authority or other entrusted entity	Ms. Emine DÖĞER Acting (Deputy CFCU Director) Central Finance and Contracts Unit Tel: +90 312 295 49 00 - Fax: +90 312 286 70 72 E-mail: emine.doger@cfcu.gov.tr Address: Eskişehir Yolu 4 Km, 2 Cad. (Halkbank Kampüsü) No:63 C		
Implementation responsibilities	Blok 06580 Söğütözü/Ankara-TÜRKİYE Dr. Nihat PAKDİL Deputy Undersecretary of MoFAL Ministry of Food, Agriculture and Livestock (MoFAL) Tel: Fax: E-mail: nihat.pakdil@tarim.gov.tr		
	Adress: Eskişehir Yolu 9. Km Lodumlu/Ankara - TÜRKİYE		
	Location		
Zone benefiting from the action	Turkey		
Specific implementation area(s)	Turkey		
Timeline			
Final date for concluding Financing Agreement(s) with IPA II beneficiary	At the latest by 31 December 2017		
Final date for concluding delegation agreements under indirect management	At the latest by 31 December 2017		
Final date for concluding	3 years following the date of conclusion of the Financing Agreement, with the		

procurement and grant contracts	exception of cases listed under Article 189(2) of the Financial Regulation				
Final date for operational implementation	6 years following the conclusion of the Financing Agreement				
Final date for implementing the Financing Agreement (date by which this programme should be decommitted and closed)	12 years following the conclusion of the Financing Agreement				
Policy objectives / Markers (DAC form)					
General policy objective		Not targeted	Significant objective	Main objective	
Participation development/good governance				✓	
Aid to environment			✓		
Gender equality (including Women In Development)			✓		
Trade Development		✓			
Reproductive, Maternal, New born and child health		✓			
RIO Convention markers		Not	Significant	Main	
		targeted	objective	objective	
Biological diversity			✓		
Combat desertification		✓			
Climate change mitigation		✓			
Climate change adaptation			✓		

1. RATIONALE

PROBLEM AND STAKEHOLDER ANALYSIS

Regarding Fisheries

The Common Fisheries Policy (CFP) gives Producer Organisations (POs) an important role in running the Common Organisation of the Market of fishery and aquaculture products and in fisheries resource management. To ensure the setting up of POs in compliance with the EU, Turkey needs to renew its legal regulatory framework for producer groups (current Cooperatives and Producer Unions) to be more effective in the market. In addition, Turkey needs to evaluate its current market mechanisms and provide a specific long term Plan of Action on moving from multiple market mechanisms towards an institutional framework in which producer groups guide producers towards sustainable fishing and aquaculture, in particular by collectively managing the activities of their members. The EU uses to this end especially the production and marketing plans delivered by POs. Also Turkey made a first step in exploring the development of PMPs with pilot POs through EU Twinning Project 'Institutional Capacity Building for Fishery Producer Organisations'. This twinning project, in one of its components, analysed the challenges of current market organisation, during which amongst others the following problems were identified:

- the current missing legal framework for the introduction of recognised POs in Turkey, because of which current Turkish POs cannot play as yet a big role in market organisation;
- producer groups are not collecting data of their members; the lack of sectoral awareness and applying a value chain approach;
- limited market analyses and market studies, which provides little insight in demand for fishery and aquaculture products;
- data on fishery production are not reliable, which makes it hard to make conclusions about current supply;
- the lack of market intelligence makes it difficult for fishery producer groups to plan production

As a result of the aforementioned challenges, producer groups in Turkey cannot regulate the market on the expected level to balance supply to the demand. Therefore, apart from the Ministry of Food, Agriculture and Livestock, producers cannot have a voice in price determination. For this reason, the welfare of the producers could not be improved. Moreover, due to absence of effective producer groups and current long value chain, casues fluctuations in prices and high price of the fisheries products. This diminishes the purchasing power parity of the consumers which could be listed as the other substantial stakeholders.

In the long term, producer groups will have a crucial role in the harmonisation of Turkey to the EU; therefore, it is expected from the producer groups in Turkey to carry out the responsibilities which apply to the European POs through related EU regulations.

Regarding rural development (support to ARDSI)

The Agriculture and Rural Development Support Institution (ARDSI) aims to set up its 2016-2020 strategic plan that would be implemented throughout IPARD II period and needs to determine its risk management system correspondingly. This plan will need to ensure that each functional area has a clear work programme to be able to assess progress against the achievement of the planned objectives. Moreover ARDSI's risk management system will need to be revised to include the eight components of the Committee of Sponsoring Organizations of the Treadway Commission (COSO)'s Enterprise Risk Management Framework (ERM). Determining whether an ARDSI's enterprise risk management is "effective" is a judgement resulting from an assessment of whether the eight components are present and functioning effectively. For this reason ARDSI aims to set up an integrated strategic plan and risk management structure according to the rules of these eight components (Internal Environment, Objective Setting, Event Identification, Risk Assessment, Risk Response, Control Activities, Information and Communication and Monitoring). In addition, ARDSI also aims to strengthen control mechanisms to implement performance improvement in order to execution of activities effectively, economically and efficiently.

In addition, according to the Commission recommendation ARDSI also needs to set up a risk management and strategic planning system to enhance effectiveness and efficiency of control activities of Institution in the light of ISO 31000 standard. Ultimately, it is expected that the operational planning which is integrated with ERM develops its ability to ensure its on-going compliance with the requirements of their IPARD procedural manuals and of the European Commission's accreditation criteria and internal control framework set in the legal basis.

Furthermore, risk assessment and control activities are important components of the internal control framework. Institutional risk assessment will play a key role in the selection of the appropriate control activities to undertake and control activities will ensure the ARDSI's objectives are achieved. Therefore, ARDSI needs to revise its control activities that must be appropriate, function consistently according to plan throughout the period, and be cost effective, comprehensive, reasonable and directly relate to the control objectives.

As of the IPARD II Programme 2016-2020, ARDSI will fulfil requirements of the Programme with new sectors and needs to enhance its operational planning system in detail in order to have better planning for IPARD II.

Since the IPARD II Programme is relatively new, ARDSI as the IPARD Agency needs to strengthen its capacity of strategic planning methodology for its determined responsibilities. The Agency needs to revise its risk management system in light of COSO's ERM standards according to the IPARD II programme, so that they can be allocated to the appropriate functional area for them, in turn to identify the risk arising from them.

Regarding agricultural statistics (support to FADN)

The Farm Accountancy Data Network (FADN) system was first initiated in Turkey in 2007 within the scope of an EU project titled "Establishment of Pilot Turkish Farm Accountancy System". In the first stage, the system was established in 9 pilot provinces with 350 farms. In this previous project, the required legislative regulations were elaborated, and since their enforcement, the system has been operated according to this legal base.

The second FADN project titled "Extension of pilot FADN Project and Ensure Sustainability", which was financed under the 2009 programming year, started in 2011 when the number of provinces increased to 12. This follow-up project aimed to increase data usage and data quality. However, the quality of data generated by statistical sampling remained limited. As the sampling plan was finalized through the end of the project, there was no enough time to test it properly. On the other hand, the use of FADN data remained limited to the presentations of the project experts.

The number of provinces was increased to 54 in 2014, and the system was extended to the whole country in 2015. The needs assessment document emphasized that up scaling the operation of FADN in Turkey would pose specific challenges. The organisational structure, in other words, the institutional settings, which imply the presence of an operational and sustainable FADN unit, will be determinative of the proper control and management of the production process as well as of the quality of FADN data. Agricultural policy decisions must be based on sound and accurate analyses. There is a need for FADN data, which is used as input in the decision-making process, to be assessed and any errors in FADN data to be identified and corrected. For this purpose, well-established and tailored routines are required for selecting and interacting with farmers, such as easy-to-use cashbooks, farm visits, forms that facilitate correct data entry, appropriate tests, adequate training of staff etc. The users will benefit from the results of the improved data production process, including reports, models, research, micro-data, policy evaluations etc. In view of these aspects, in order to train farmers and data collectors and build the necessary capacity for an extended FADN, a structure needs to be designed and established for yearly training sessions. The targets to be achieved with this activity are to increase the perception of FADN, and to strengthen the institutional capacity of MoFAL through the elaboration of different data collection methodologies and the establishment of a permanent FADN unit, and to prepare draft legislation. the aim is also to increase the usage of FADN data by training MoFAL staff and improving data quality by means of on-the-spot checks to be carried out at selected farms.

Currently, the data collectors are civil servants appointed at the provincial and district directorates of MoFAL, as defined in the By-Law on the Establishment and the Operation Procedures and Principles of the

Farm Accountancy Data Network System, which was published in the Official Gazette dated 22/01/2009 and numbered 27118. Under this activity, the data collection methodologies will be elaborated and if needed an amendment will be made.

1. Insufficient FADN perception	1.1. Intensive awareness raising	1.1.1. Publication of bulletins 1.1.2. Provision of data analysis 1.1.3. Usage of media
2. Insufficient institutional capacity	2.1. Determination of the best data collection methodology	2.1.1. Amendment to national legislation
3. Insufficient usage of FADN data	3.1. Increase of FADN data usage	3.1.1. Establishment of a simulation model 3.1.2. Training of central and provincial staff
		3.1.3. Sector analysis in the provinces 3.1.4. Procurement of necessary software and hardware 3.1.5. Integrated usage of FADN data with GIS

OUTLINE OF IPA II ASSISTANCE

The main focus of this Action is on support to MoFAL regarding the institution and capacity building in the field of negotiation chapters 11 and 13.

Regarding fisheries

IPA II will aim at sustaining Turkey's efforts in the areas already covered by IPA regarding alignment with the acquis in the field of fisheries as well as the efforts related to the preparation of Turkey for future implementation of the CFP.

Producer groups need to take an active role in recording their members' production and providing readily available market information on the sector. So, it was recommended that producer groups create a database in their area of operation and link their database with the other national databases.

Considering that producer groups lack enough capacity and capability for data collection, the first step will be the creation/improvement of a database, which will be handled by the producer groups. The aim is to make producer groups gather information on the total quantity of the supply, the first sale price of the products and consumer preferences. This information will be used by the producer groups to prepare Production and Marketing Plans. This activity also foresees developing a theoretical framework for establishing a well-functioning auction model for Turkey's fisheries sector to ensure more transparency and gradually enhanced market intelligence. The sector strategy and National Action Plan (with a complementary communication strategy), which were prepared in the previous Twinning project, will contribute to the achievement of these objectives.

Regarding rural development (support to ARDSI)

The IPARD II Programme includes new sectors besides former measures; thus it will further contribute to the implementation of and dissemination of the harmonisation studies in the Agriculture and Rural Development Sector. Lessons learned from the IPA I period and priority areas defined in the IPA II period were taken into account while preparing IPARD II programme, which strengthens the correlation between institutional and capacity building and IPARD subsectors. In other words, IPARD, as the largest component of the Agriculture and Rural Development Sector during IPA II, will keep contributing to the sustainable adaptation of the agricultural sector and the implementation of Community standards.

ARDSI as the IPARD Agency needs to prepare its Planning Document for 2016-2020 for strengthening implementation capacity of risk management and control activities. This plan will need to ensure that each functional area has a clear work programme with objectives, performance indicators and operational risks against which they can assess progress against the achievement of their objectives. Besides Top Management of ARDSI, personnel at Headquarters and 42 Provincial Coordination Units are main direct beneficiaries of the related action.

The activity is expected to contribute to a common understanding about eight components of Committee of Sponsoring Organizations (COSO's) Enterprise Risk Management Framework. ARDSI aims to set up and adopt an integrated risk management and strategic planning framework across the Institution in the light of ISO 31000 and COSO standards to improve the institutional capacity related with control activities with a view to fulfilling IPARD requirements. The strategy will be attained through awareness raising activities and training concerning the rules and practices of the EU methodology. The plan is to set up a monitoring system using a software with specific emphasis on control activities based on risk and performance indicators. The main results of this action will be that the institutional capacity of the Agricultural and Rural Development Support Institution (ARDSI) improved in terms of risk management and control activities and a monitoring system for performance and risk indicators established in line with IPARD II requirements. Preparing an action plan in the light of SMART principles (Specific, Measureable, Achievable, Realistic and Time-Related) and setting up a monitoring system to track progress of the controls applied are expected from this activity. This will materialise through the preparation and organisation of a phased training plan for the Provincial Coordination Units and Headquarters staff and the provision of on-line training package for sustainable training.

Regarding agricultural statistics (support to FADN)

The "FADN Target 2020" activity aims to increase the usage of FADN data and to increase data quality of FADN. The expected results are a better perception of FADN at both central and provincial levels, the improvement of the capacity of provinces for the implementation of FADN and the analysis of the data collection methodology. There will be multiple activities to train the staff in order to increase the usage of FADN data. Besides, raising awareness on FADN among the MoFAL staff, provinces, NGOs and farmers will be targeted through radio, TV spots, the FADN website and visits to NGOs.

Policy development and coordination

The quality of policies and legislation developed for Chapters 11 and 13 and the agriculture sector in general in Turkey depends largely on the processes in which they have been developed, i.e. whether policy and legislative proposals are based on evidence, whether the cost of their implementation has been calculated and budgeted and whether they have been consulted at the right time of the process with internal and external stakeholders.

According to the OECD/SIGMA 2015 baseline measurement report¹, which benchmarks Turkey's administrative system, including the policy development and coordination system against the Principles of Public Administration, Turkey has a number of elements in place that ensure evidence-based policy and legal development, but further improvements are needed:

- Turkey has legislation for regulatory impact assessments (RIA), but implementation varies in different ministries. RIAs are generally not attached to the policy and legislative proposals, which are presented to the assembly. Also, RIAs are not published and their quality is not systematically checked. These shortcomings hinder the use of the RIA as a tool to systematically inform decision-making.
- Policy and financial planning are not fully integrated, because policy planning is based on two separate documents and financial planning (medium-term budgetary framework) is also presented in two separate documents. Sectoral strategies play therefore a minor role in the policy planning system, and do not have uniform requirements and are not costed.
- Inter-ministerial consultation mechanisms function generally well, but there are no regular forums for

¹ http://www.sigmaweb.org/publications/Baseline-Measurement-2015-Turkey.pdf

conflict resolution among ministries, resulting to routine use of ad hoc solutions.

- Public (external) stakeholder consultations are regularly organised in line with the legal provisions, but the practises vary widely in quality and depth, as there is no central coordination and follow-up. Consultation outcomes are regularly made public on the websites of ministries.

The legislative and policy development activities under this action will need to address the identified shortcomings in order to ensure 'better regulation', which is a key requirement for ensuring implementation and enforcement of new policies and legislation. This is in line with the EU Better Regulation agenda at the EU level and an important aspect of public administration reform, a key pillar of the enlargement process.

RELEVANCE WITH THE IPA II STRATEGY PAPER AND OTHER KEY REFERENCES

As regards the ability to assume the obligations of EU membership, Turkey will have to continue an intensive process of aligning its national legislation with that of the EU. The agriculture and rural development sector requires substantial investments and technical assistance for alignment.

IPA II will aim at sustaining Turkey's efforts in the areas already covered by IPA regarding alignment with the Acquis in the area of food safety, veterinary and phytosanitary policy, and in the field of fisheries as well as the efforts related to the preparation of Turkey for future implementation of the Common Agriculture Policy (CAP).

The Indicative Strategy Paper 2014-2020 for Turkey (Strategy Paper) states that: "in the area of agriculture and rural development, the activities will mainly aim at supporting Turkey's the alignment and implementation of the Common Agricultural Policy. Building capacity in the IPARD managing authority, the IPARD agency and supporting institutions such as advisory services, as far as is necessary for IPARD II. Other activities will include setting-up of EU-aligned agricultural support schemes and mechanisms, improving statistics, improving the climate resilience of agricultural sector, organic farming control and certification systems. Activities will be planned to prepare introducing the Single Common Market Organization (CMO) rules and standards." This requires further strengthening of the capacity of the MOFAL including IPARD Managing Authority and IPARD Agency.

Furthermore, in previous Progress Reports it has been stated that there are no developments as concerns the common market organisation. Moreover, the EU Progress Report 2014 for Turkey indicated that there had been no improvements on structural actions, market policy and state aid. However, the same document states that the recently launched project on fishery producer organisations can be seen as an initial step to organise the market in line with the Acquis. The EU Progress Report 2015 for Turkey also stipulates that "on market policy, the EU supports efforts to build up the ministry's capacity. However, more needs to be done to prepare and implement a strategy and action plan".

In the National Action Plan Phase II, the importance of increasing the institutional capacity of MoFAL related to the producer organisations and establishing the relevant infrastructure for CMO in line with the EU is underlined.

In the 10th Development Plan, it is implied that there is a need for the improvement of the local and central administrative capacity of the MoFAL and TurkStat to operate information systems, including the FADN and Farmer Registry System, in order to produce reliable agricultural statistics, which are very crucial in agricultural policy making.

LESSONS LEARNED AND LINK TO PREVIOUS FINANCIAL ASSISTANCE

After becoming a candidate country in 1999, Turkey started to benefit from the European Union funds. In terms of alignment, the Ministry of Food, Agriculture and Livestock completed 38 projects with a budget of approximately 236 Million Euros in the period of 2002-2014 (excluding support for IPARD), which covered a wide spectrum of technical areas including agriculture, rural development, food safety, veterinary, phytosanitary and fisheries.

The summary of lessons learnt for previous projects identified by project assessments, project monitoring reports, reports of the Result Oriented Monitoring TA for Turkey and final report on the EC's "Evaluation of European Commission Support to Agriculture Sector in Turkey" project sub-committee meeting on

Agriculture and Rural Development as well. The following is a summary of the most common lessons learnt for the Agriculture and Rural Development Sector in Turkey:

- Legislative alignment requires relatively a lot of time,
- Political commitment and ownership of the project by the MoFAL are of importance for achieving the objectives of projects,
- Coordination and cooperation among the relevant DGs help the well-functioning of the project,
- Clearly defined institutional responsibilities & authority is the basis for sustainability of projects,
- Terms of Reference for the project key staff shall be defined in detail and thus, the ToR need to be explicit, otherwise the expected complete implementation and success of the project and satisfaction of the beneficiary could not be assured.
- Selection of project team, trainers, and experts and programming of project activities are the factors that affect success of the project,
- Stakeholder participation is of high importance for subsequent acceptance of management decisions,
 Public awareness campaigns are of crucial importance to achieve cooperation and effectiveness of the projects.
- Limited participation of stakeholders (producers' unions and cooperatives) in Member States visit was heavily criticized by the aforementioned group that caused the unwillingness and lack of devotion of the producer groups 2011 Twinning Project on Fisheries POs.
- The need to improve the dissemination of outputs, particularly to provincial staff and to relevant stakeholders,
- Trustable market intelligence requires timely collection of data,
- Market and value chain analysis is crucial for the preparation of Production and Marketing Plans,
- During the implementation of the previous Twinning project, it was understood that both consumer information and consumer awareness are fundamental for the sustainability of the sector,
- The women population in the fisheries sector is fragile and the number of women participants is low. In the previous twinning project, it was understood that the POs could play a substantial role in providing the continuity of women participation in the sector by encouraging their members,
- Producer groups play a substantial role in the harmonisation of Turkish fisheries according to the EU standards through collecting data, planning production and providing sustainability in the sector,
- Market organisation takes time, effort and a committed and devoted team,
- The awareness of the management level as regards FADN remained weak at the end of the project and required further attention.
- FADN staff should be permanent in order to maintain the experience already gained.
- The feedback reports generated for the farmers were not understood and used by them for farm management. Therefore, no benefit could be gained from these reports.
- The logbooks elaborated in the previous FADN projects were not easy to be filled in by the farmers and required further simplification.

The lessons learnt from the various assessments are used for planning of IPA II period. A general lesson learnt, applying to all sectors, is that policy and legislative development needs be evidence-based, costed and subject to appropriate internal and external stakeholder consultations at the right time of the legislative and policy-making process. This is key to ensure implementation and enforcement of adopted policies and legislation.

Link to Previous Financial Assistance:

Regarding fisheries

Two projects have already been implemented in the fisheries sector and related with the Common Market Organisation. One of them, 2003 PHARE "Fisheries Sector-Legal and Institutional Alignment to the EU Acquis", aimed to align the Turkish legislation and institution to the EU acquis. In terms of contribution to the market organisation in Turkey, the most important result of this project is the fact that the first steps were taken in terms of data collection in fisheries through the creation of a Fisheries Information System (SUBİS). Moreover, this project helped assess the roles of POs in the organisation of the fisheries market.

Further alignment to the EU acquis in the area of the fisheries Common Market Organisation has been consolidated through the second project 2011 IPA-"Institutional Capacity Building for Fishery Producer Organisations". As a result of this project, draft laws laying down the rules on the recognition of producers organisations, consumer information and marketing standards have been prepared. Furthermore, several guidelines for the preparation of production and market plans and functional stakeholder involvement in market organization, a training package for the implementation of the CMO, Sector Strategy and National Action Plan for the implementation of the CMO are among the most important outputs of the project. In order to materialize aforementioned outputs of the project, the initial steps to create a working committee, which is planned to be composed of technical staff from various departments of the Ministry, has been taken. Last but not the least, this project highly contributed to increase the communication and cooperation among the Ministry and the representatives of the producers groups. This twinning project helped the representatives of certain producers groups in Turkey to grasp the general framework of the EU fisheries CMO. In the current Technical Assistance project, the previous studies will be extended to the members of the several producer groups and Provincial Directorates of the Ministry. The theoretical knowledge on CMO provided to the producers groups in the previous project will be put into practice by data collection activities and enhanced through further training activities in this sequel project.

Regarding agriculture and rural development (support to ARDSI)

Through the project 2005 PHARE"Establishment of an Instrument for Pre-Accession Assistance Rural Development Agency", task descriptions of the units under the Headquarters and Provincial Coordination Units of IPARD Agency and the job descriptions of their staff were developed, application forms for each measure included in the IPARD Programme and detailed implementation procedures for the staff were prepared, and headquarters and 20 Provincial Coordination Units were established and furnished.

Regarding agricultural statistics (support to FADN)

Two EU-financed projects have already been implemented on agricultural statistics and FADN; i.e.

In the context of the first project, 2006 PHARE *Establishment of a Pilot farm Accountancy Data Network* (*FADN*), a sampling plan was prepared by using the 2006 data of TurkStat. Farm addresses were provided, yet field studies proved the sampling frame to be out-of-date. As a result, the sampling plan was not able to be used efficiently.

In the second project launched in 2009 IPA, *Extending the Pilot FADN Project and Ensure Sustainability*, although increasing data usage was addressed, this was not enough to convince the management level about the importance of FADN. Furthermore, the knowledge of staff on FADN was assessed as being mainly theoretical and could not be put into practical use by staff. The 2009 project included further awareness campaigns complementary to those conducted under the 2006 project. Still, awareness needed to be further strengthened at management level. Due to the high turnover of the staff experienced in FADN, the first months of the 2009 project had to be dedicated to training of the new staff. One of the lessons learned from the project is that high staff turnover should be avoided and a permanent team dedicated to FADN operation established.

2. INTERVENTION LOGIC

LOGICAL FRAMEWORK MATRIX

OVERALL OBJECTIVE	OBJECTIVELY VERIFIABLE INDICATORS (*)	SOURCES OF VERIFICATION	
To contribute to Turkey's gradual alignment with EU legislation in the areas of agricultural and fisheries policies.	Progress made towards meeting accession criteria	- Commission's Progress Report on Turkey -Report-DG AGRI &Managing Authority -Official Governmental reports	
SPECIFIC OBJECTIVE	OBJECTIVELY VERIFIABLE INDICATORS (*)	SOURCES OF VERIFICATION	ASSUMPTIONS
To enhance the institutional capacity of MoFAL regarding implementation of the requirements of relevant EU legislation in Turkey within the scope of Chapter 11 and 13.	- Number of fishery producer organisations in the Registration System which submit the data regularly; - Compliance of the risk management system with the relevant standards (ISO 31000 and COSO); - Number of agricultural holdings participated in FADN system	Periodical review, assessment and reporting including independent monitoring and evaluation Data reports extracted from the National System Data reports extracted from the risk monitoring system Policy documents	Commitment of Turkey for EU accession continues.
RESULTS	OBJECTIVELY VERIFIABLE INDICATORS (*)	SOURCES OF VERIFICATION	ASSUMPTIONS
Result 1: Technical and institutional capacities of provincial directorates of MoFAL and fisheries producer organisations have been increased through implementation of a regularly reviewed and updated sector strategy (including National Action Plan) according to the dynamics of the fishing and aquaculture sectors.	Number of Provincial Directorate's staff and members of fishery producer organisations trained;	- Activity monitoring reports - Data records - Data from the Registration system	- Available the pilot POs and Provincial Directorate's staff - Utilizable registration system for the pilot POs - Effective cooperation between the pilot POs and MoFAL to share data information - Effective cooperation between relevant DGs of the MoFAL
Result 2: Institutional capacity of the Agricultural and Rural Development Support Institution (ARDSI) improved in terms risk management and control activities and a monitoring system for performance and risk indicators established in line with IPARD II requirements	- Number of ARDSI staff/stakeholders who successfully completed the training course on ISO 31000 standards and COSO's Enterprise Risk Management Framework	- Training materials and hand-outs Training programs - Participant lists - Certificates given to the trainee	- Roll over of IPARD II ensured
Result 3: Full functionality of FADN is ensured at central and provincial levels	- Number of agricultural holdings tested according to EU Standards	- Case study reports - Test reports - FADN software	- Voluntary participation of farmers into the system continues

DESCRIPTION OF ACTIVITIES

Activity 1. Capacity Building for Fisheries Producer Organisations and Provincial Agricultural Directorates in line with CMO of CFP

Increase of the technical and institutional capacity of provincial directorates of MoFAL and existing fisheries organisations;

- 1.1 Extension of the Training package (prepared in previous twinning project on POs) to the Provincial staff of MoFAL and producer groups, which remained out of the scope of the previous project.
- 1.2. Providing training on consumer information, labelling, market transparency for current producer groups.
- 1.3. Revision and dissemination of awareness material (manuals, guidelines, website social media accounts and other visual material) to the members of the producers groups and staff of the Provincial Directorates.
- 1.4. Information exchange meetings conducted as study visits between Turkish POs and staff of relevant public institutions in the EU.
- 1.5. Selection of pilot POs for the collection of data regularly
- 1.6. Preparation of Production and Marketing Plans by the selected pilot POs based on data collected.

A regularly reviewed and updated sector strategy (including National Action Plan) according to the dynamics of the sector.

- 1.7 Implementation of the sector strategy (including National Action Plan)
- 1.8 Assistance with updating the sector strategy while ensuring financial sustainability (costing, budgeting), including the establishment of CMO in Turkey

Setting up a system for the fishermen to submit their data (catch, price, etc.) to their cooperative/producer union.

- 1.9 Introduction of a system for the submission of data of the members (individual catch/production, production method, first sale price, etc.) of the producer groups.
- 1.10 Establishing a National Fishery and Aquaculture PO Registration System, focusing on supply data of POs and demand data of the market, to be integrated into the "Agricultural Sector Integrated Management Information System" by Central Unions of Fishery Producer Organisations.
- 1.11. Market and value chain analysis for certain commercial species in the Pilot regions in order to provide an initial step for the establishment of market intelligence in the fisheries sector.

Recommendation of an Auction model.

- 1.11 Assessment of the current auction/sales system and future role of producer groups in Turkey.
- 1.13 Raising awareness of producer groups and Provincial Directorates on the functions and benefits of the alternative auction systems in the EU.
- 1.14 Setting up a theoretical framework for a fisheries auction model with related IT system for market transparency and secure data.

Activity 2. Strengthening Implementation Capacity of Risk Management and Control Activities of Agriculture and Rural Development Support Institution (ARDSI)

The purpose of this Activity is the improvement of the capacity in ARDSI regarding the implementation of IPARD II. The activity is expected to achieve strengthening implementation capacity of risk management and control activities of Agriculture and Rural Development Support Institution (ARDSI).

2.1 Preparation of the strategic planning document which identifies the objectives and risks to implement IPARD Programme effectively. It is aimed to amend the current risk management and strategic planning system to enhance effectiveness and efficiency of control activities of ARDSI in the light of ISO 31000 standard and COSO's Enterprise Risk Management (ERM) Framework.

- 2.2 Identification of institutional risks, planning of actions in the light of SMART principles (Specific, Measureable, Achievable, Realistic and Time-Related) and establishment of monitoring systems to track progress of the controls with the reference of EU models,
- 2.3 Determination of key risk indicators (KRI) and performance indicators for ARDSI to ensure better implementation of the control activities.
- 2.4 Adoption of the new framework involving eight components of COSO's ERM approach and prevention of key risks.

The activity is expected to bring better planning and risk management framework which is important for effectiveness and efficiency of the IPARD programme and high utilization rate of funds. Experience in the implementation of IPARD I tells us that identifying all necessary steps, timetable, objectives and risks for gradual adoption of EU legislation is crucial important. Therefore, it is necessary to strengthen the knowledge base of the strategic planning and risk management methodology in order to contribute to the IPARD objectives.

Activity 3. FADN: Target 2020

- 3.1. Communication tools such as bulletins, brochures, posters, television and radio spots, and other visibility materials will be prepared to increase awareness on the importance of FADN. 3.2. For 12 selected provinces from 12 NUTS1 regions, the annual FADN reports, including sector analyses, horizontal aspects and cost estimations will be prepared. The reports will be translated and 10.000 copies will be distributed to the NGOs, farmers and experts in the sector.
- 3.3 In selected 12 provinces from 12 NUTS1 regions, visits to stakeholder NGOs will be organised. Visits will be done to, but not only, the Agriculture and Rural Development Support Institution (ARDSI) Provincial Coordination Unit, Provincial Chamber of Agriculture (TZOB), Regional Development Agencies Provincial Coordination Unit, Commercial Bank, Union of Exporters etc.
- 3.4 A FADN website will be established. The website will include general information about FADN, the history, the organisational structure, the improvement of FADN in Turkey, how farmers benefit from FADN, examples for data use, examples of feedback reports to the farmers, useful links, FAQ.
- 3.5. Monitoring the data collection, usage of data, new developments in different Member States.
- 3.6 Farm management training (1 day sessions) will be given to FADN farmers and representatives of NGOs in selected 12 provinces from 12 NUTS1 regions. Farm study groups will be organised (1 day sessions). For each activity, at least 50 farmers and in total at least 75 persons will participate. Event provinces will be selected by MoFAL.
- 3.7 Training programmes (3 days) will be organised on the usage of FADN data for at least 50 data collectors and at least 15 FADN central staff in 12 NUTS1 regions and Ankara.
- 3.8 Current IT facilities will be assessed and a needs analysis report will be prepared.
- 3.9 The test structure of FADN data will be examined and coherence with EU standards ensured.
- 3.10 A sampling plan for FADN will be elaborated by using the related databases of MoFAL and TURKSTAT.
- 3.11 An on the spot check (OTSC) study will be carried out for FADN farms to ensure the reliability of the data. At least 1000 randomly selected farms will be checked. OTSC training will be given to the inspectors in Ankara (5 days). OTSC will include at least acreage, income, cost and purchase & sale transactions.
- 3.12 Training will be given to FADN central staff on advanced statistical analyses, including generalised linear models, cluster analysis, data envelopment analysis, regression, ANOVA analysis, factor analysis etc. This training will be at least for 10 FADN central staff for 10 days.
- 3.13 Training will be organised for FADN central staff on usage of Statistical Package Programmes. This training will be for at least 10 staff and not shorter than 2 weeks.

- 3.14 A simulation model will be developed for Turkish agriculture. This model will be capable of using both FADN data and other agricultural statistical data. It will also include an optimisation module.
- 3.15 Training will be given for the usage of the simulation model developed under Activity 3.14 to FADN central staff. This training will be at least for 10 FADN central staff for 5 days.
- 3.16 Training will be given to FADN Central staff on the use of Geographical Information Systems tools for FADN data for 3 days in MoFAL premises.
- 3.17 Case studies will be performed in 1 province in 2 agricultural basins to test and use the simulation model and statistical analyses mentioned in Activity 4.1 and Activity 4.5.
- 3.17 Efficiencies of data collection methodologies will be compared.
- 3.18 The most efficient data collection methodology for Turkey will be designed/established.
- 3.19 The data collection methodology will be tested in two provinces which will be selected by MoFAL and a report will be submitted.
- 3.20 Draft legal infrastructure for more efficient data collection will be prepared.

RISKS

Risks in this sector relate to lack of inter-institutional coordination and insufficient human resources to ensure ownership and sustainability of activities. These will be mitigated by adequate provision of human and financial resources by the Ministry of Food, Agriculture and Livestock, at both central and provincial level.

CONDITIONS FOR IMPLEMENTATION

For the activity on fisheries' producer organisations, a Ministerial Consent is going to be signed to guarantee the participation of the relevant personnel of the Ministry both on central and provincial level and to encourage active involvement of the other stakeholders like Producer Organisations.

As regard to the activity on ARDSI, the roll-over of IPARD II should be ensured before the implementation starts.

3. IMPLEMENTATION ARRANGEMENTS

ROLES AND RESPONSIBILITIES

MoFAL is the Lead Institution of the agriculture and rural development sector. The IPA Unit established under the General Directorate of European Union and External Relations of MoFAL will be responsible for programming, monitoring and evaluation of this action.

CFCU will be responsible for tendering, contracting, administration, overall activity supervision, review and approval of the reports, financial management including payments of the activities of IPA II activities, in line with the mandates given under the IPA II legal framework and in accordance with the principle of sound financial management, and in order to ensure the legality and regularity of the expenditure incurred in implementing the programme.

The General Directorate of Agrarian Reform and Agriculture and Rural Development Support Institution (IPARD Agency) of MoFAL are the end beneficiaries of the Action.

However, a number of other institutions and state organisations are also involved such as the Ministry for EU Affairs, the Ministry of Finance, the Ministry of Economy, the Ministry of Development ,the Undersecretariat of Treasury, the Ministry of Customs and Trade and TURKSTAT.

IMPLEMENTATION METHOD(S) AND TYPE(S) OF FINANCING

All three activities will be implemented in **indirect management**.

Activities	Types of financing	Indicative Duration
Activity 1 "Capacity building for fisheries producer organisations and provincial	Twinning contract	15 months
agricultural directorates in line with CMO of CFP"	Technical Assistance contract	6 months
Activity 2 "Strengthening Implementation Capacity of Risk Management and Control Activities of Agriculture and Rural Development Support Institution (ARDSI)"	Technical Assistance contract	12 months
Activity 3 "FADN: Target 2020"	Technical Assistance contract	18 months

4. Performance measurement

METHODOLOGY FOR MONITORING (AND EVALUATION)

In line with the IPA II Implementing Regulation 447/2014, an IPA II beneficiary who has been entrusted budget implementation tasks of IPA II assistance shall be responsible for conducting evaluations of the programmes it manages.

Institution and Capacity Building Sub Sector action programmes are monitored at three different levels i.e. at the overall programme level, the activity level and the contract level. The data to be compiled and analysed for the purpose of monitoring are based on a bottom-up transmission of information from the contract level to the overall programme level involving subsequent steps in aggregating data.

The IPA Unit of MoFAL, which is the Lead Institution for the Institution and Capacity Building Sub Sector of Agriculture and Rural Development Sector, has responsibility in monitoring this Action programme and it carries out its monitoring duties by using the tools given below:

- a. Institution and Capacity Building Sub Sector Monitoring Committee,
- b. Activity Level Steering Committees,
- c. Institution and Capacity Building Sub Sector Annual Implementation Report,
- d. Progress and Monitoring Reports,
- e. Result Oriented Monitoring Reports,
- f. Monitoring visits, verification visits, on-the-spot check visits, ad-hoc visits.

The European Commission may carry out a mid-term, a final or an ex-post evaluation for this Action or its components via independent consultants, through a joint mission or via an implementing partner. In case a mid-term or final evaluation is not foreseen, the European Commission may, during implementation, decide to undertake such an evaluation for duly justified reasons either on its own decision or on the initiative of the partner. The evaluations will be carried out as prescribed by the DG NEAR guidelines for evaluations. In addition, the Action might be subject to external monitoring in line with the European Commission rules and procedures set in the Financing Agreement.

INDICATOR MEASUREMENT

Indicator	Baseline (2016)	Target 2020	Final Target (2020)	Source of information
Progress made towards meeting accession criteria				DG NEAR Progress Report
-Number of fishery producer organisations in the Registration System which submit the data regularly	0	100	100	Data recordsActivity monitoring reportsData from the Registration system
-Compliance of the risk management system with the relevant standards (ISO 31000 and COSO)	0	1 Fully compliant	1 Fully compliant	Data reports extracted from the risk management system Certificates of the relevant standards
-Number of agricultural holdings participated in FADN system	6.000	10.000	10.000	- Case study reports - FADN software

- Activity 1. Capacity Building for Fisheries Pro	ducer Organisations and Pro	ovincial Agricultural Directo	orates in line with CMO of	CFP
Number of Provincial Directorate's staff and members of fishery producer organisations trained;	38	600	600	 Training materials and hand-outs. Training programs Participant lists Certificates given to the trainee
Activity 2: Strengthening Implementation Capacity of Risk Management and Control Activities of Agriculture and Rural Development Support Institution (ARDSI)				
Number of ARDSI staff/stakeholders who successfully completed the training course on ISO 31000 standards and COSO's Enterprise Risk Management Framework	0	650	650	 Training materials and hand-outs. Training programmes Participant lists Certificates given to the trainee
Activity 3. FADN: Target 2020				
Number of agricultural holdings tested according to EU Standards	0	6.000		- Case study reports Test reports

5. SECTOR APPROACH ASSESSMENT

In terms of the EU accession process, there has been a noticeable progress made in the agriculture and rural development sector. There have been some advances in establishing various components of the Common Agriculture Policy (CAP) and in alignment of targeted legislation for animal and plant health, information systems employed in agriculture, food safety, organic farming and rural development. Programming studies have been conducted by taking into account of this progress and prioritisation of the Sector especially in the context of the EU accession process. It is also noted that this Action is complementary and coherent with former actions and takes the current needs into account as well in order to sustain the achievements and to follow a robust sectoral approach. There were many projects and activities conducted related to the activities proposed in this Action by means of the EU financial assistance as well as many complementary actions and initiatives taken by the MoFAL.

MoFAL is the lead Ministry in the sector which coordinates the work for the development of policies, and the preparation and enforcement of legislation in all areas of the sector. A decree concerning the restructuring of the MoFAL entered into force in 2011 and it is an important step in developing administrative structures necessary to implement the related EU legislation. MoFAL has 81 Provincial Food, Agriculture and Livestock Directorates and 846 District Directorates at local level.

MoFAL ensures further developments in the areas related to this Action by having adopted many policies and strategies. There is a wide range of national documents identifying the road map for the Turkish agricultural sector. Those national documents varying from macro level to micro level present the Turkish agriculture strategies and plans in a more holistic way. The 10th Development Plan (2014-2018) is the most important and the highest level nation-wide strategic document to lead the Agriculture and Rural Development Sector along with the other key overarching strategic document covering the entire sector called the Strategic Plan of MoFAL for the period of 2013-2017 embracing the EU priority areas and pursuing accession process. There are also other supportive supplementary documents elaborated for the Sector. In this sense, it is crucial to state that the objectives drawn up in the strategic documents as compliance with the priorities of the sector in terms of the EU accession were reflected in the Indicative Strategy Paper preparations.

The Agriculture and Rural Development Sector compromises two sub-sectors, which are (I) institutional and capacity building, and (II) rural development mostly known as IPARD. Although, those two sub-sectors have had different intervention modalities since the IPA I period, both sub-sectors ultimately have been serving for the same objective, which is to contribute to Turkey's preparation for the implementation of the EU Acquis on agriculture and rural development field for its accession to the EU. The institutional and capacity building activities aim at increasing the alignment level with the EU standards mostly in legal terms along with introducing new systems and so on, whilst IPARD concerns increasing the implementation capacity of those currently introduced legal framework along with the other EU requirements to be met in rural areas.

In the sector, the strong cooperation among relevant institutions, donors and civil society will continue under the supervision and the coordination of MoFAL as the lead institution. For the coordination of EU alignment effort among government institutions, the Internal Coordination and Harmonization Committee (IKUK) established for Chapters 11, 12 and 13, coordinates the work on the alignment and implementation of the EU acquis and the accession negotiations. IKUK meetings are held under chairmanship of the MEU and with participation of permanent EU Contact Points (Chosen from high level managers) of each public institute. Furthermore, the Sector Working Group, headed by the MEU, coordinates the prioritisation of alignment issues, selection of projects to be proposed for financing under IPA programming and provides references for the work conducted under the IKUK.

Turkey has had close cooperation with International Financial Institutions (IFIs) for almost three decades in the Agriculture and Rural Development Sector. In the sector, the international donors, beside the EU, as Turkey's partners are as follows; the World Bank (WB), United Nations Food and Agriculture Organisation (FAO), World Organization for Animal Health (OIE), Economic Cooperation Organization (ECO), the International Fund for Agricultural Development (IFAD), Islamic Development Bank (IDB), Organization of Petroleum Exporting Countries (OPEC) and United Nations

Development Program (UNDP). It should also be noted that on June 4, 2014, the bilateral agreement between MoFAL and FAO was signed. Apart from European financial assistance, a great number of projects addressing sectoral issues have been conducted with donor institutions within the sector. However, during the IPA II period, the cooperation with the other key donors will be reformulated by considering the priority areas for IPA II by taking into account the sectoral approach. Therefore, within the MoFAL, DGof EU and Foreign Relations has been in charge of not only programming of IPA but also ensuring the coordination amongst other donors and EU financial assistance in order to support the sector in a more holistic and complementary way. The MEU may facilitate donor financing opportunities as complementary and supportive actions the European financial assistance.

The budgetary allocation for the sector is provided through the annual preparation of the Medium Term Programme (MTP) and Medium Term Fiscal Plans (MTFP) for a three year perspective in accordance with the provisions of Turkey's Public Financial Management and Control Law No: 5018. The MTFP (2014-2016) envisages that the budgetary allocation of TL31,1 billion to agricultural supports in the period of 2014-2016. As regard to assessment of performance in achieving the objectives defined in the Strategic Plan of MoFAL, there is an internal evaluation system, which is called Performance Programme, employed in the Ministry along with other integrated assessment tools for the evaluation of especially EU funded activities in the Agriculture and Rural Development Sector, i.e. the EU Accession Negotiations Management Board, DIS Meetings, and ROM.

Within this scope, the activities have been prepared in a sectoral approach manner considering the relevant national strategic framework, the requirements of the EU, the prioritization of the issues and the relevance amongst the activities in order to create further capacity building and developments.

6. Cross-cutting issues

GENDER MAINSTREAMING

Gender balance will be sought on all the managing bodies and activities of the Action. Equal participation of women and men is secured in the design of the operations and in the implementation stage in order to ensure that the services are provided on a rights-based approach. Based on the fundamental principles of promoting equality and combating discrimination, participation in the activities will be guaranteed on the basis of equal access.

The Institution and Capacity Building sub-sector aims at a meaningful participation of all individuals, both men and women in the design, implementation, monitoring and evaluation of all the relevant operations and programmes. To implement this commitment, the participation level of men and women in training sessions and similar activities will be documented for monitoring purposes and reported on at the level of Steering Committees.

Women involved in the fisheries sector are fewer. For this reason, it is crucial to sustain their presence in the sector. In this context, representation of women in the producers groups will be encouraged through this activity.

EQUAL OPPORTUNITIES

Based on fundamental principles of promotion equality, participation in the activities shall be guaranteed based on equal access regardless of sex, racial or ethnic origin, religion or belief, disability, age or sexual orientation. Fisheries and aquaculture producer groups are democratic platforms in which each and every member has a voice and equal vote without any kind of discrimination.

MINORITIES AND VULNERABLE GROUPS

According to the Turkish Constitutional System, the word minority encompasses only groups of persons defined and recognized as such on the basis of multilateral or bilateral instruments to which Turkey is a party. This Action does not have any negative impact on minorities or vulnerable groups. Events will be held in building where access for people with disabilities is available.

ENGAGEMENT WITH CIVIL SOCIETY (AND IF RELEVANT OTHER NON-STATE STAKEHOLDERS)

Stakeholder involvement is crucial for the Action. In the designing phase of the Action, a meeting was held with the representatives of relevant CSOs which are Union of Turkish Agricultural Chambers, Ankara Province Chamber of Veterinarians, KÖY-KOOP (Village Cooperative), SUYMERBİR (Central Union of Aquaculture Producers) and SURKOOP (Central Union of Fisheries Cooperatives) on 1 March 2016 and their opinion about the Action and especially the activities was taken into account. Moreover, CSOs will be involved in the activities, invited regularly to the project meetings and informed about recent developments on the activity at the regular intervals.

In terms of civil society involvement in the Agriculture and Rural Development Sector, several means are used. First, MoFAL works in close collaboration with NGOs such as cooperatives, unions, associations, foundations and voluntary organisations operating in the field of agriculture while regulating the sector. Further, relevant NGOs as stakeholders are invited regularly to the project meetings if any projects conducted at MoFAL. Secondly, when drafting the legislation and policies, open consultation mechanisms are used in order to improve the quality of governance and address all the issues properly in policies and legislations. In Turkey, "Regulation on Procedures and Principles of Preparation of Legislation (Official Gazette No: 26083)" is in force to support the involvement of NGOs in decision making and consultation mechanisms. Where relevant, specific attention will be paid in the framework of this action to ensure that civil society and other non-state stakeholders are consulted in the right time of the legislative and policy-making process and that the decision-makers are informed about the outcomes of the consultations.

ENVIRONMENT AND CLIMATE CHANGE (AND IF RELEVANT DISASTER RESILIENCE)

The activities that will be implemented under this action do not have any negative impact on environment and climate change.

The activity on Fisheries POs, would improve fisheries data collection and hence improve stock assessment. These studies will have positive impact on the status of the fish stocks and the ecosystem through enhanced conservation and sustainability policies.

7. SUSTAINABILITY

Regarding the Activity: "Strengthening Implementation Capacity of Risk Management and Control Activities of Agriculture and Rural Development Support Institution", a strategy for the alignments of the EU standards to implement IPARD programme effectively is expected to be prepared. ARDSI experts who are trained through this activity will be well organised for planning the roadmap of IPARD activities. They will also continue to improve control activities that are used for achieving the IPARD objectives. The planning document and software will be the main element for monitoring performance and risk indicator while fulfilling of IPARD requirements. The implementation of the road map and the new system by the trained staff will ensure sustainability of the activity.

Regarding the activity "Capacity building for fisheries producer organisations and provincial agricultural directorates in line with CMO of CFP", the system newly established for better data collection and the increased institutional capacity will ensure sustainability of efforts for further enhancement of the organisation of the market in Turkey. The activity will also contribute to the sustainability of the previous Twinning project (TR11IBAG01) on Fisheries POs through implementation of recommendations provided by the former project and also through the CMO Working Committee.

Regarding the activity "FADN: Target 2020", a number of MoFAL personnel will be dedicated to work solely on FADN and these staff members will be trained on statistical methods, remote sensing and data analysis. Besides, spill over effects will emerge as a result of the activities on the training of trainers in the project.

8. COMMUNICATION AND VISIBILITY

Communication and visibility will be given high importance during the implementation of the Action. The implementation of the communication activities shall be funded from the amounts allocated to the Action.

All necessary measures will be taken to publicise the fact that the Action has received funding from the EU in line with the Communication and Visibility Manual for EU External Actions. Additional Visibility Guidelines developed by the European Commission (DG NEAR) will have to be followed.

Visibility and communication actions shall demonstrate how the intervention contributes to the agreed programme objectives and the accession process. Actions shall be aimed at strengthening general public awareness and support of interventions financed and the objectives pursued. The actions shall aim at highlighting to the relevant target audiences the added value and impact of the EU's interventions and will promote transparency and accountability on the use of funds.

This Action specifically introduces several communication tools such as bulletins, brochures, posters, television and radio spots, and other visibility materials. It will also include awareness-raising via stakeholder trainings where there would be opportunities to use visibility materials. The EU visibility guidelines will be followed in all these activities in a way to ensure transparency and accountability on the use of funds.