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To: EASTERN PARTNERSHIP TERRITORIAL COOPERATION- MANAGING AUTHORITY
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Tel.: +380 44 5811956, email:eaptc-kiev@giz.de

Attn: GIZ GmBh, Ukraine, Head of Joint Managing Authority

Reference: 1st Call for Proposals under the Territorial Cooperation Programme Moldova – Ukraine

Application: Joint Approach to Transfrontier Environmental Challenges through common GIS based methodology (ETCETERAGIS)

Reference number: 23/P2/2.1

Referring your address from 18 January 2016

In accordance with the provisions of the Guidelines for Applicants, Chapter 2.5.1. "Content of the decision", we do the following,

COMPLAINT

Concerning decision of the Evaluation Committee sent by above address, we believe that we have been drastically marked down, according to the rating scale, for the following considerations:

B. Section 1. Relevance of the action

At point 1.1

On the question: "How relevant is the proposal to the objectives and priorities of the Call for Proposals?" experts Judgment is: "The project application **proposal is quite relevant to the overall objective of the Call, Operational objectives 2 , priority 2.1**"

And whereas awarded score is 6 from available 2x5=10 – it's follows that **quite relevancy** of project application proposal (described in the Concept Note) to the overall objective of the Call, Operational objectives 2 **is equal to 60%,** And, understandingly – in the Section 1.3.1 of the Concept Note should be find 40% which isn't quite relevant to the Programme criteria. But comparison of the Section 1.3.1 of the Concept Note with appropriate

text of Chapter 2.1.5 of the "Guidelines for Grant Applicants" don't show any discrepancy between description of relevancy in Concept Note and criteria in Guidelines (see comparative table). At the same time the proposed activity isn't conform to any criteria of ineligibility for this Programme.

Section 1.3.1 of the Concept Note	**Chapter 2.1.5 of the "GUIDELINES FOR GRANT APPLICANTS"** **Operational objective 2 - Addressing common challenges.** **Priority 2.1. Solving cross-border environmental problems, enhancing emergency prepared**
to strengthen cross border contacts between local authorities, communities and civil society organizations to help develop joint solutions to common social and economic development challenges, and is relevant to the Operational Objective 2: "Addressing common challenges" through **elaboration of a common methodology for harmonization of GIS systems used by different users in compliance with EU directives**. As well as, the Project is framed within Priority 2.1. **Solving cross-border environmental problems, enhancing emergency preparedness.** It comes **to contribute to the environment improvement by activities** related to establishment of GIS databases **networking for urban development with integration of environmentl issues** and applying of the SOFTs **for GIS based DBs networking and waste management systems**.	The following actions may become subject matter of joint projects: Development of **joint approaches to waste collection, management and recycling**; Raising **public awareness and understanding of cross-border environmental issues and their effects on living conditions and economic activity in the bordering regions** Actions for **rapid response in the emergency situation in case of manmade and natural hazards and disasters** The following types of actions are **ineligible**: actions without cross-border impact; actions implemented outside the eligible geographic area; actions related to profit making activities, unless they generate an income to ensure their continuity beyond the end of the Grant Contract actions started before the signature of a contract; actions implemented after the project implementation period (unless otherwise pre-approved by Contracting Authority); actions already covered by other European Union programmes or by other third party funding (double funding);

Therefore the imbalance between expert Judgment and difference in the Score should be revised.

At point 1.2

On the question: "How relevant to the particular needs and constrains of the target country(ies) or region(ies) in the proposal? (including synergy with other EU initiatives and avoidance of duplication)" experts Judgment is: "The general context is **adequately described**. The **relevance is in the line with** some particular **needs and constrains of the target countries**, but **not fully explained** (*in Concept Note*) **how stakeholders can benefit from the proposed actions**"

Whereas awarded score is 3 from available 5 – it's follows that **relevance is in the line with some particular needs and constrains of the target countries** in project application proposal (described in the Concept Note) **is equal to 60%,** It means that experts don't see in Section 1.3 of the Concept Note 40% of explanations how stakeholders **can benefit from the proposed actions** for their **particular needs**.

But in the Section 1.3 of the Concept Note is given exhaustive set of transfrontier needs and constrains on state and regional/municipality level, as well as systems solutions based on nowadays technologies allows satisfy all these needs and constrains in equilibrium between national and concrete stakeholders accordingly to the general requirements of the Programme, shown in the Table:

Section 1.3 of the Concept Note for some particular needs and constrains of the target countries, not fully explained how stakeholders can benefit from the proposed actions	**GUIDELINES FOR GRANT APPLICANTS**
Both in Moldavian and Ukrainian urban and rural boundary areas all problems and means for their resolution are divided between law capacity self–governmental authorities	**1.1. BACKGROUND** one of the instruments to tackle economic disparities between regions and raise the quality of life across the area in a sustainable manner,

and too centralized governmental structures with their local branches. In such environmental-social-economic sector as nowadays waste treatment (which includes wastes flows forecasting, accounting, sanitary cleaning schemes optimization, waste sorting and processing /utilization/disposal using BAT-best available technologies). As well as it just the same for water supply, sewages and emergency preparedness were're absent agreed systems approaches. As a result – the amount of unassorted waste flow in Chernivtsi & in Balti need urgent systems solutions. **Section 1.3.3** Needs: to diminish technological/ anthropo-genic risks impact on the environment and the population; to improve the capacity of GIS users in applying the common methodology; to develop soft infrastructure for waste management in the target area; to reduce those risks associated with waste management in particular, and risks of environmental and technological disasters in general, which are generated by cities; to improve standards of life for population in target areas; to set up a mechanism and institutional framework which will minimize the technological/anthropogenic risks impact on the environment and the population Constraints: - the national directives from target countries do not stipulate a methodology for harmonization of GIS systems used by different users. **Problems** with which are **faced beneficiaries will be solved through:** (1) **modern tools** - elaboration of **joint methodology** of GIS application; (2) **improved waste management on cross border level** - established **partnerships between operators of waste management from Balti and Chernivtsi**, which will cooperate and **use the similar softs** for data collection and providing; (3) **joint training and seminar** - involved the operators of the GIS systems from Balti and Chernivtsi cities; the institutions which need data provided by GIS operators; the waste management operators from Balti and Chernivtsi cities in order to be trained in **applying the common methodology of GIS application**;	which promote a strategy-based, inclusive approach to reduce economic and social regional disparities and realise the regional (hence national) economic potential... multilateral cooperation... the EaP could help develop closer ties between the partner countries themselves **2.1.5.** ***Eligible actions: actions for which an application may be made*** Solving cross-border environmental problems, enhancing emergency preparedness Development of **joint approaches to waste collection, management and recycling**; Raising **public awareness and understanding of cross-border environmental issues and their effects on living conditions and economic activity in the bordering regions**

Therefore this misunderstanding has to be reevaluated.

At point 1.3

On the question: "How clearly defined and strategically chosen are those involved (final beneficiaries, target groups)? Have their needs been clearly defined and does the proposal address them appropriately?" experts Judgment is: "The final beneficiaries and the target groups is not described, it's just mentioned with some quantitative data. The final beneficiaries are overestimated. The needs and constrained of the final beneficiaries **are described** but without clear explanations how the project activities contributes to solving them"

Whereas awarded score is 2 from available 5 – it's follows that mentioning of the final beneficiaries and the target groups, as well as clearance of explanations how the project activities contributes to solving needs and constrained of the final beneficiaries in the project application proposal (described in the Concept Note) **is only on the level of 40%,** It means that **experts don't see** in Section 1.3 of the **Concept Note 60% of** clear for them **description of the final beneficiaries and the target groups and** of explanation how the project activities contributes to solving the **described** their **needs and constrains.**

To clarification already given in previous item, it's necessary to add that (taking in consideration very small volume of the Concept Note) it was impossible to repeat in Section 1.3. for the second time the same information about final beneficiaries and the target groups already explained in the Section 1.1 of the Concept Note.

Whereas they are shown there as **operators of GIS systems** (which should cover whole territories of project area, e.g. in accordance with Program "Digital Moldova" leaded by its nowadays Prime-minister) – we are sure that final beneficiaries aren't overestimated.

Taking also into account shown in the Concept Note final result of the project – "Improved management and institutional capacities of the local waste management operators" – the evaluation of this proposal aspect, on our opinion **must be reinvestigated.**

At point 1.4

On the question: "Does the proposal demonstrate a cross-border character? (i.e. fulfils at least one of the following criteria: (1) joint development, (2) joint implementation, (3) joint staffing, (4) joint financing?" experts Judgment is: "The cross-border character has not fully justified"

And the awarded score 3 from available 5 means that the missing justification is equal to 40 %. But the comparison between the content of Section 1.3.4 of the Concept Note and requirements of the Guidelines don't allow to trust this, whereas project demonstrated the creation of one cross-border implementation team, joint financing by all co-applicants, joint staffing with providing of the staff by all co-applicants. We do consider that the score for this criteria has to be the maximum as the proposals mentioned also in the concept note its way of the joint implementation, joint staffing and joint financing. And this is also asserting by the fact that through Programme development period this project proposal was jointly discussed and represented by representatives of the co-applicants from Balti and Chernivtsi on the Conference in Chisinau on 2 of December 2013 and on Seminars in Balti on 12-14 of February 2014, in Vadului-Voda on 4-8 of August 2014 and in Chernivtsi on 29.09.2014.

At point 1.5

On the criteria: "The joint proposal has at least applicant and co-applicant coming from the Moldova and Ukraine but the involvement of more co-applicants from eligible regions of the Programme contributing with valuable inputs for the action is encouraged" experts Judgment is: "One applicant from Moldova, 2 co-applicants from Ukraine and 1 co-applicant from Moldova. The role of each is not quite clear presented"

In the content of the Concept note there is not any section or requirements to describe the role of the project partners . They are described in the full application form (and also were proofed through the Program development period, as it shown in the previous item). The minimal requirements for at least one applicant and one co-applicant are met and valuable inputs with more co-applicants is ensured. But the awarded score 3 from available 5 is on the same level of 60% needs clarification.

B. Section 2. Design of the action

At point 2.1

Just the same 60% were given, answering the question "How coherent is the overall design of the action? In particular, does it reflect the analysis of the problems involved, take into account external factors and relevant stakeholders?" by the experts Judgment "The **design of the action is well described and coherent**. It's not clear mentioned why this project is proposed for cross border partners to cooperate. The **analysis section is clear structured and presents the problems that the project aims to solve.** Not all possible external factors influencing the implementation of the action are taken in consideration"

But the awarded score is 3 from available 5.

It's not possible to give in short Concept Note all details of only mentioned there the links to more then 15 years collaboration in pilot Euroregion "Upper Prut", which since 2000 (see http://www.bukoda.gov.ua/UserFiles/File/2012/Decis8.pdf) supports projects in this direction development, as well as to Recommendation letter given by the appointed representatives of 14 countries of the EU Strategy for Danube Region (EUSDR) and its support http://www.danubeenvironmentalrisks.eu/files/directory/84 from EUSDR Priority Area V. And also there can't be reflected also only mentioned joint MD-UA discussion and approbation of this project approach in the framework of SEE Interreg project STATUS https://www.dropbox.com/sh/piity6o86xpcx1a/wVJVcotn1I

At point 2.2

On the question: "Is the action feasible and consistent in relation to the objectives and expected results?" experts Judgment is: "The **action has and adequate description and seems to be consistent.** The results are not measurable and try to be specific".

But the awarded **score is 4 from available 10.**

Conclusion:
The presented above examples are just several wich more contradictory justify the assigned scores. We consider that scores of all sections are underestimated and the main part of the information prvided in the concept note has been not taken into consideration and evaluation have been made not objectively and impartially. The iportance of the project results for the cross-border regional development has been not assessed.

Best regards,

Mayor of Balti Municipality ***Renato USATII***