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## **(Interreg V-A) Lithuania-Poland**

EX-ANTE EVALUATION OF LITHUANIA-POLAND CROSS  
BORDER COOPERATION PROGRAMME 2014-2020

DRAFT FINAL REPORT

Contractor:

**FINOVUS**

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# CONTENTS

<b><u>TABLES AND FIGURES .....</u></b>	<b><u>3</u></b>
<b><u>ACRONYMS.....</u></b>	<b><u>4</u></b>
<b><u>EXECUTIVE SUMMARY .....</u></b>	<b><u>6</u></b>
<b><u>1. METHODOLOGY AND EVALUATION PROCESS.....</u></b>	<b><u>9</u></b>
1.1. Purpose and Scope of Ex-ante Evaluation .....	9
1.2. Overview of Evaluation Process and Structure of the Ex-ante Evaluation Report .....	10
<b><u>2. STRATEGY AND INTERVENTION LOGIC OF THE PROGRAMME.....</u></b>	<b><u>13</u></b>
2.1. Selection of Thematic Objectives and Investment Priorities .....	13
2.2. The Internal Coherence of the Programme .....	24
2.3. Relationships of the Programme with Other Instruments .....	33
2.4. The Consistency of the Allocation of Budgetary Resources with the Objectives of the Programme.....	36
2.5. The Consistency of the Programme with the Europe 2020 Strategy and other strategic documents.....	40
2.6. Indicators .....	47
2.7. Performance Framework.....	61
2.8. Rationale of the Form of Support Proposed .....	61
<b><u>3. HORIZONTAL PRINCIPLES .....</u></b>	<b><u>63</u></b>
3.1. Equal Opportunities .....	63
3.2. Sustainable Development .....	63
<b><u>4. IMPLEMENTING PROVISIONS .....</u></b>	<b><u>65</u></b>
4.1. Adequacy of Human Resources and Administrative Capacity for the Management of the Programme .....	65
4.2. Suitability of the Procedures for Monitoring the Programme .....	66
4.3. Reduction of Administrative Burden on Beneficiaries .....	67
<b><u>5. MAIN CONCLUSIONS AND RECOMMENDATIONS.....</u></b>	<b><u>70</u></b>

## TABLES AND FIGURES

### Tables

Table 1. Scope of the ex-ante evaluation .....	9
Table 2. Map of the ex-ante evaluation report .....	11
Table 3. TOs and IPs of the Programme.....	13
Table 4. Net migration in Lithuania and Poland .....	19
Table 5. Structure of 2007–2013 LT-PL CBC Programme .....	24
Table 6. Intervention logic of IP 1.1 .....	25
Table 7. Intervention logic of IP 2.1 .....	27
Table 8. Intervention logic of IP 2.2 .....	29
Table 9. Intervention logic of IP 3.1 .....	31
Table 10. Intervention logic of IP 4.1 .....	32
Table 11. Relationship with LT OP under Investment for growth and jobs goal.....	34
Table 12. Relations with PL OPs under Investment for growth and jobs goal .....	34
Table 13. Relations with other ERDF and ENI CBC programmes.....	35
Table 14. Allocation of funds .....	36
Table 15. Consistency of the Programme with the Europe 2020 strategy .....	40
Table 16. Common Strategic Framework .....	47
Table 17. Assessment of Programme’s result and output indicators .....	49
Table 18. Main conclusions and recommendations.....	70

### Figures

Fig. 1. Trends in the number of tourists in the Programme area .....	15
Fig. 2. The structure of the tourists’ flow in the Programme area.....	15
Fig. 3. Tourists structure in the Programme regions of Lithuania .....	16
Fig. 4. Tourists structure in the Programme regions of Poland.....	16
Fig. 5. Number of tourists in different regions of the Programme.....	17
Fig. 6. Number of new business entities per 1000 inhabitants .....	18
Fig. 7. Level of unemployment in the Programme regions .....	20
Fig. 8. Level of youth unemployment in Programme regions of Poland and Lithuania .....	21
Fig. 9. Allocation of funds among thematic objectives in 2014–2020 .....	38
Fig. 10. Comparison of demand for funds in 2007–2013 and allocation of funds in 2014–2020 ....	38

## ACRONYMS

AA	Audit Authority
EUSBSR	European Union Strategy for the Baltic Sea Region
CA	Certifying authority
CBC	Cross-border cooperation
CF	Cohesion Fund
CP	Cooperation Programme
CPR	Common Provisions Regulation (Regulation (EU) 1303/2013)
CSF	Common Strategic Framework
EAFRD	European Agricultural Fund for Rural Development
EC	European Commission
EIA	Environmental Impact Assessment
EMFF	European Maritime and Fisheries Fund
ENI	European Neighbourhood Instrument
ERDF	European Regional Development Fund
ESF	European Social Fund
ESI Funds	European Structural and Investment Funds
ETC	European Territorial Cooperation
EU	European Union
EUR	Euro
GDP	Gross domestic product
ICT	Information and communication technologies
IP	Investment priority
JMC	Joint Monitoring Committee
JS	Joint Secretariat
JSC	Joint stock company
LT	Lithuania
MA	Managing authority
MEUR	Million euros
NA	National authority
NGO	Non-governmental organisation
OP	Operational Programme
PL	Poland
PTF	Programming Task Force
RCP	Regional Contact Point
SEA	Strategic Environmental Assessment
SME	Small and medium-sized enterprises
SO	Specific objective
SPF	Small Project Fund
TA	Technical assistance
TFEU	Treaty on the Functioning of the European Union
TO	Thematic objective

This ex-ante evaluation report has been prepared in the framework of the service contract No. PPS-022 “Ex-ante evaluation and strategic environmental assessment of Lithuania-Poland cross border cooperation programme 2014-2020”, concluded between the contracting authority public enterprise “Joint Technical Secretariat” and the contractor JSC “Finovus” on 7 August 2013. The ex-ante evaluation services were provided together with the partner Public Policy and Management Institute, the environmental report was produced by JSC “AF-Consult”.

This report encompasses the results of the ex-ante evaluation of the Lithuania-Poland Cross Border Cooperation Programme 2014–2020. Results of the environmental assessment are presented in separate document (Environmental Report).

The ex-ante evaluation report is based on the Programme draft of 22 July 2014, which was presented for public consultations.

## EXECUTIVE SUMMARY

The ex-ante evaluation of the Lithuania-Poland Cross Border Cooperation Programme 2014–2020 (Programme and/or 2014-2020 LT-PL CBC Programme) aimed at enhancing the quality of the programming and contributing to the improved effectiveness of the Cooperation Programme (CP). The scope and methodology of the ex-ante evaluation was based on the requirements laid down in EU regulations and methodological documents.

The ex-ante evaluation process was based on participation and consultations with decision makers, including mutual learning, iterative and interactive work. The progress and results of the ex-ante evaluation were presented to the members of the Programming Task Force (PTF) set for preparation of the Programme throughout the process. The ex-ante evaluation resulted in a series of suggestions and recommendations to the developers of the CP, which evolved together with the draft of the Programme. The provided suggestions and recommendations covered the choice of investment priorities (IPs), definition of specific objectives (SOs), formulation of interventions (activities), choice of result and output indicators, definition of Programme management structures and implementing arrangements, etc. Most of the recommendations were accepted by the developers of the Programme and integrated into the Programme document. The final draft of the ex-ante evaluation report is based on the Programme draft of 22 July 2014, which was presented for public consultations, and as such represents only a part of the evaluator's contribution to the whole programming process which took more than a year.

The justification of the selection of thematic objectives (TOs) and IPs provided for in the Programme document and the analysis of the needs and challenges performed during the ex-ante evaluation revealed that all TOs and IPs were reasonably selected for the CP. The selected TOs and IPs also take account of the lessons learned during implementation of European Territorial Cooperation (ETC) objective 2007-2013 Cross Border Cooperation Programme Lithuania-Poland (2007-2013 LT-PL CBC Programme) and would help to ensure continuity and durability of cross border cooperation (CBC) links and initiatives started in the previous programming periods. The analysis of consistency of the Programme with the Europe 2020 strategy and other strategic documents revealed that the selected TOs, IPs and corresponding SOs are in line with the Common Strategic Framework (CSF), Partnership Agreements for Lithuania and Poland, headline targets and flagship initiatives of the Europe 2020 strategy and Council recommendations for Lithuania and Poland adopted in accordance with the Article 121(2) of the Treaty on the Functioning of the European Union (TFEU) for the period 2014-2015.

The Programme combines 4 priority axis and 5 IPs/SOs; consequently, a very limited number of the selected IPs results in rather broad SOs. Lessons learned during the implementation of the 2007-2013 LT-PL CBC Programme show that such wide priorities and SOs may be beneficial for the Programme – as the projects would be generated following “bottom-up” approach, limited number of priorities and SOs would reduce fragmentation of the Programme and would allow for the necessary flexibility and implementation of complex and comprehensive CBC projects.

The analysis of the reconstructed intervention logic of the Programme showed that generally the foreseen results reflect the change the interventions intend to bring to CBC region; outputs and output indicators in general reflect the main foreseen interventions (activities); the foreseen activities are consistent with and would contribute to the achievement of the expected outputs and the specific objectives of the IPs. However, a number of weaknesses or other observations related to the intervention logic of the Programme were also identified (e.g. in some IPs outputs and output indicators reflect only part of the foreseen interventions, outputs and output indicators do not cover monitoring of immediate project results, some activities are overlapping with the activities foreseen under the same or different IPs, some activities could be presented in more coherent and focused way, etc.).

Allocation of financial resources between the TOs is justified taking into account such factors as strategic importance of the selected TOs and IPs, main characteristics of the priority axes and lessons learned from the previous programming periods. However, in order to ensure sufficient amount of quality project applications in the less popular priority axis additional, more targeted promotion and communication actions and tools directed at potential project applicants might be needed.

The Programme territory would benefit from a number of operational programmes (OP) funded under the Investment for growth and jobs goal and other CBC programmes financed by the European Regional Development Fund (ERDF) and the European Neighbourhood Instrument (ENI). The contribution of these programmes to the Programme's region would be considerably higher than the overall budget of the Programme. Therefore, the Programme's funds should be allocated to the projects that would demonstrate the strongest CBC effects, would be best targeted at the promotion of cooperation links between the relevant actors of LT and PL regions and would contribute to social and economic development on both sides of the border. Such approach would help to ensure proper coordination and synergies with other programmes implemented in the Programme's region.

The analysis of the result and output indicators has revealed that although the majority of the proposed indicators are sufficiently relevant and clear, the system of indicators could be further improved to better reflect the planned interventions, expected outputs and results. Also, in order to ensure consistent interpretation of indicators between project promoters and Programme management institutions and to ensure correctness and consistency of aggregated data on the achievement of indicators, a detailed methodology on calculation and reporting of indicators should be prepared at the initial stages of Programme implementation. The quantified target values for the majority of output and result indicators are realistic; however for significant part of indicators more ambitious quantified targets could be set.

The milestones selected for performance framework of the Programme combine all output indicators as well as financial indicators, thus the selected milestones represent the intended progress towards the targets set both at Programme and priority axis level. However, the values of intermediate milestones established for 2018 could be more ambitious and could be differentiated taking into account the types of interventions.

The Programme will be implemented through non-repayable grants. This form of assistance is justified and could be considered the most suitable for the Programme both in terms of the characteristics of

the planned interventions and the experience from the 2007-2013 PLT-PL CBC Programme implementation.

The principle of equal opportunities would be horizontally addressed in all TOs of the Programme. Furthermore, the activities foreseen under TO8 and TO9 would have a positive impact on the implementation of the principle of equal opportunities and combating discrimination in the CP territory.

The Programme does not include large infrastructure or industrial projects and does not set the framework for future development consent for projects listed in Annexes I and II of Environmental Impact Assessment (EIA) Directive, therefore significant negative impacts on environment are unlikely. Taking into account the selected TOs, IPs and the corresponding SOs, the Programme's interventions would have a positive impact on the promotion of sustainable development in a number of areas, however small financial volume of the Programme would limit the Programme's impact on the overall sustainable development of the CP region.

The management structures envisaged for the administration of the Programme would be based on those, used for the administration of the 2007-2013 LT-PL CBC Programme. Such administrative setup would allow securing continuity of the administrative system, preserving the experience related to the administration of the CBC programmes and ensuring that the Programme is managed by the institutions that have adequate human resources and administrative capacity. As the technical assistance (TA) funding decreased by more than 28% compared to 2007-2013 period, one of the biggest challenges in ensuring the adequacy of human resources and administrative capacity for the management of the Programme would be related to the sufficiency of funding. To ensure the sufficiency of funding, special attention should be paid to simplification and optimisation of the Programme management arrangements, which would allow reducing both the administrative burden to beneficiaries and the administrative costs to the Joint Secretariat.

Programme document provides rather vague description of the planned measures and actions related to reduction of administrative burden for the beneficiaries. Simplification measures foreseen in the Programme might be significantly broadened and might include wider use of simplified cost options, electronic exchange of data and more effective e-solutions, more proportional management and control arrangements for small projects.

# 1. METHODOLOGY AND EVALUATION PROCESS

## 1.1. Purpose and Scope of Ex-ante Evaluation

The ex-ante evaluation of the EU structural assistance programming documents for the 2014-2020 period is a mandatory task the results of which are to be presented to the European Commission (EC) together with the Operational Programmes (OP) submitted for final approval. On the other hand, the ex-ante evaluation of the OPs is an important tool for improvement of delivery of the EU cohesion policy rather than just a means of formal reporting to the EC. In particular, the benefits of ex-ante evaluation of the Programme in terms of improvement of the planning and delivering quality resulted from the evaluation: a) being performed at the programming stage; and b) covering the key issues related to the investing of the EU structural assistance; and c) contributing to the building and dissemination of knowledge about planning and implementation of the EU assistance.

The ex-ante evaluation was based on the theory of change approach; to the extent made possible by information available in the Programme draft, it reconstructed the overall logic of interventions for the priority axes and investment priorities, assessed the suitability of the defined targets and possible impact of the investments, the adequacy of human resources and administrative capacity to manage the Programme, including the adequacy of the Programme monitoring and evaluation system.

The scope and methodology of the ex-ante evaluation were based on the requirements laid down in the EU regulations (in particular, Regulation (EU) No 1303/2013<sup>1</sup> (CPR)) and methodological documents (in particular, Guidance document on ex-ante evaluation). The scope and the questions of the ex-ante evaluation followed the requirements laid down in Article 55 of CPR (Table 1).

**Table 1. Scope of the ex-ante evaluation**

Pursuant to the Article 55(3) of the CPR ex-ante evaluation shall appraise:

- (a) the contribution to the Union strategy for smart, sustainable and inclusive growth, having regard to the selected thematic objectives and priorities, taking into account national and regional needs and potential for development as well as lessons drawn from previous programming periods;
- (b) the internal coherence of the proposed Programme or activity and its relationship with other relevant instruments;
- (c) the consistency of the allocation of budgetary resources with the objectives of the Programme;
- (d) the consistency of the selected thematic objectives, the priorities and corresponding objectives of the Programme with the CSF, the Partnership Agreement and the relevant country specific recommendations adopted in accordance with Article 121(2) TFEU and where appropriate at national

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<sup>1</sup> Regulation (EU) No 1303/2013 of the European Parliament and the Council of 17 December 2013 laying down common provisions on the European Regional Development Fund, the European Social Fund, the Cohesion Fund, the European Agricultural Fund for Rural Development and the European Maritime and Fisheries Fund and laying down general provisions on the European Regional Development Fund, the European Social Fund, the Cohesion Fund and the European Maritime and Fisheries Fund and repealing Council Regulation (EC) No 1083/2006

- level, the National Reform Programme;
- (e) the relevance and clarity of the proposed Programme indicators;
- (f) how the expected outputs will contribute to results;
- (g) whether the quantified target values for indicators are realistic, having regard to the support envisaged from the ESI Funds;
- (h) the rationale for the form of support proposed;
- (i) the adequacy of human resources and administrative capacity for management of the Programme;
- (j) the suitability of the procedures for monitoring the Programme and for collecting the data necessary to carry out evaluations;
- (k) the suitability of the milestones selected for the performance framework;
- (l) the adequacy of planned measures to promote equal opportunities between men and women and to prevent any discrimination, in particular as regards accessibility for persons with disabilities;
- (m) the adequacy of planned measures to promote sustainable development;
- (n) measures planned to reduce the administrative burden on beneficiaries.

## ***1.2. Overview of Evaluation Process and Structure of the Ex-ante Evaluation Report***

The ex-ante evaluation process was based on participation and consultations with decision makers, including mutual learning, iterative and interactive work. The progress and results of the evaluation were presented to the members of the Programming Task Force (PTF) set for preparation of the CP throughout the process. The aim of the evaluation was to contribute to a smoother and more transparent programming of the European structural and investment funds (ESI Funds), forming a consensus among the key decision-makers, promoting institutional cooperation and sharing experience.

The ex-ante evaluation resulted in a series of suggestions and recommendations to the developers of the CP, which evolved together with the draft of the Programme. The provided suggestions and recommendations covered choice of IPs, definition of SOs, formulation of activities, choice of result and output indicators, defining Programme management structures and implementing arrangements, etc. Most of the recommendations were accepted by the developers of the Programme and were integrated into the Programme document.

The final draft of the ex-ante evaluation report is based on the Programme draft of 22 July 2014, which was presented for public consultations, and as such represents only a part of the evaluator's contribution to the whole programming process which took about one year.

As mentioned in Chapter 1.1 above, the ex-ante evaluation was carried out on the basis of the evaluation questions laid down in Article 55(3) of CPR; information on relations of the evaluation questions with different chapters of evaluation report is presented in the Map of the ex-ante evaluation report (Table 2).

**Table 2. Map of the ex-ante evaluation report**

Evaluation question	Relevant chapter of the ex-ante evaluation report
(a) the contribution to the Union strategy for smart, sustainable and inclusive growth, having regard to the selected thematic objectives and priorities, taking into account national and regional needs and potential for development as well as lessons drawn from previous programming periods	Chapter 2.1 “Selection of Thematic Objectives and Investment Priorities” and Chapter 2.4 “The Consistency of the Programme with the Europe 2020 Strategy and other strategic documents”
(b) the internal coherence of the proposed Programme or activity and its relationship with other relevant instruments	Chapter 2.2 “The Internal Coherence of the Programme” and Chapter 2.3 “Relationships of the Programme with other Instruments”
(c) the consistency of the allocation of budgetary resources with the objectives of the Programme	Chapter 2.4 “The Consistency of the Allocation of Budgetary Resources with the Objectives of the Programme”
(d) the consistency of the selected thematic objectives, the priorities and corresponding objectives of the Programmes with the CSF, the Partnership Agreement and the relevant country specific recommendations adopted in accordance with Article 121(2) TFEU and where appropriate at national level, the National Reform Programme	Chapter 2.5 “The Consistency of the Programme with the Europe 2020 Strategy and other strategic documents”
(e) the relevance and clarity of the proposed Programme indicators	Chapter 2.6 “Indicators”
(f) how the expected outputs will contribute to results	Chapter 2.2 “The Internal Coherence of the Programme”
(g) whether the quantified target values for indicators are realistic, having regard to the support envisaged from the ESI Funds	Chapter 2.6 “Indicators”
(h) the rationale for the form of support proposed	Chapter 2.8 “Rationale for the Form of Support Proposed”
(i) the adequacy of human resources and administrative capacity for management of the Programme	Chapter 4.1 “Adequacy of Human Resources and Administrative Capacity for Management of the Programme”
(j) the suitability of the procedures for monitoring the Programme and for collecting the data necessary to carry out evaluations	Chapter 4.2 “Suitability of the Procedures for Monitoring the Programme”
(k) the suitability of the milestones selected for the performance framework	Chapter 2.7 “Performance Framework”
(l) the adequacy of planned measures to promote equal opportunities between men and women and to prevent any discrimination, in particular as regards accessibility for persons with disabilities	Chapter 3.1 “Equal Opportunities”

Evaluation question	Relevant chapter of the ex-ante evaluation report
(m) the adequacy of planned measures to promote sustainable development	Chapter 3.2 “Sustainable Development”
(n) measures planned to reduce the administrative burden on beneficiaries	Chapter 4.3 “Reduction of Administrative Burden on Beneficiaries”

## 2. STRATEGY AND INTERVENTION LOGIC OF THE PROGRAMME

### 2.1. Selection of Thematic Objectives and Investment Priorities

The ex-ante evaluation question addressed in this Chapter (Article 55 of CPR):

a) the contribution to the Union strategy for smart, sustainable and inclusive growth, having regard to the selected thematic objectives and priorities, taking into account national and regional needs and potential for development as well as lessons drawn from previous programming periods

Following Article 6(1) of the ETC regulation<sup>2</sup>, at least 80% of the ERDF allocation to each CBC and transnational programme shall be concentrated on a maximum of four of the TOs set out in the first paragraph of Article 9 of CPR. CBC programmes within the selected TOs may support investment priorities set out in Article 5 of ERDF regulation and also additional ETC investment priorities set out in the Article 7(1)a of the ETC regulation.

The 2014-2020 LT-PL CBC Programme concentrates on 4 TOs and 5 IPs (2 ERDF and 3 ETC specific IPs) as presented in Table 3 below.

**Table 3. TOs and IPs of the Programme**

Thematic Objective	Investment Priority
<b>TO6. Preserving and protecting the environment and promoting resource efficiency</b>	6 (c) Conserving, protecting, promoting and developing natural and cultural heritage
<b>TO8. Promoting sustainable and quality employment and supporting labour mobility</b>	8 (a) Supporting the development of business incubators and investment support for self-employment, micro-enterprises and business creation 8 (a(i) ETC) Promoting sustainable and quality employment and supporting labour mobility by integrating cross-border labour markets, including cross-border mobility, joint local employment initiatives, information and advisory services and joint training
<b>TO9. Promoting social inclusion, combating poverty and any discrimination</b>	9 (a(ii) ETC) Promoting social inclusion, combating poverty and any discrimination by promoting gender equality, equal opportunities, and the integration of communities across borders

<sup>2</sup> Regulation (EU) No 1299/2013 of the European Parliament and of the Council of 17 December 2013 on specific provisions for the support from the European Regional Development Fund to the European territorial cooperation goal

Thematic Objective	Investment Priority
<b>TO11. Enhancing institutional capacity of public authorities and stakeholders and efficient public administration</b>	11 (a(iv) ETC) Enhancing institutional capacity of public authorities and stakeholders and efficient public administration by promoting legal and administrative cooperation and cooperation between citizens and institutions

Selected TOs and IPs are further evaluated taking into account the following criteria:

- National and regional needs and potential for development;
- Lessons drawn from implementation of 2007-2013 LT-PL CBC Programme.

Contribution of selected TOs and IPs to Europe 2020 strategy is analysed in Chapter 2.5.

**TO6: Preserving and protecting the environment and promoting resource efficiency**  
**IP6(c): Conserving, protecting, promoting and developing natural and cultural heritage**

***National and regional needs and potential for development***

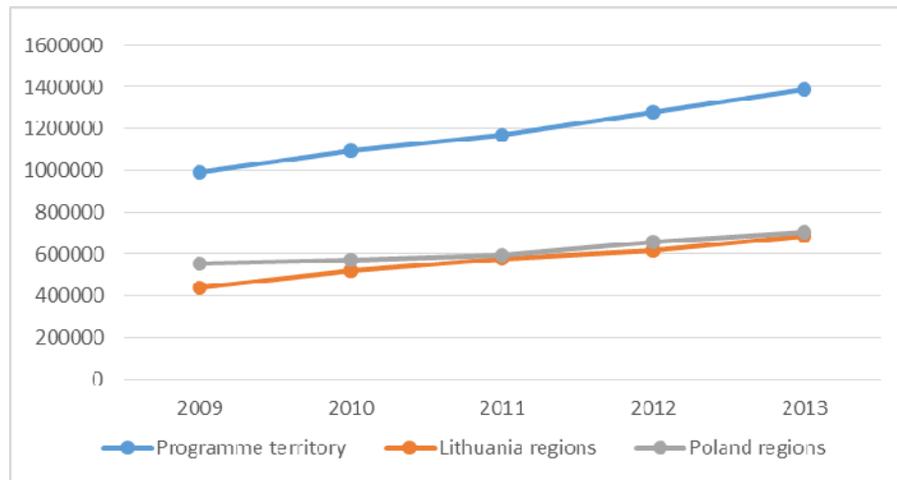
The Programme territory is rich with the natural resources, such as forests, lakes, rivers, picturesque landscapes, etc. Forested land covers around 30 % of the Programme territory (approximately 33 % on LT side and approximately 29 % on PL side). The Programme territory includes the Great Mazurian Lakes, Suwalsko Augustowskie Lakes, Zuvintas and Vistytis Lakes and others. The Nemunas, Merkys, Sesupe, Jura, Narew, Biebrza, Pisa and Elk rivers along with many smaller rivers and streams flow through the Programme territory. A lot of national and regional parks, state strict nature reserves, state strict historical-cultural reserves and NATURA 2000 sites are located within the Programme territory.

The Programme territory also hosts numerous sights of historic interests. An important element of cultural heritage is shared history of Lithuania and Poland, which lasted from 1385 to 1795. This historical period significantly contributed to the creation of shared Polish-Lithuanian cultural heritage, which may be used in developing joint tourism routes.

The Programme territory also hosts a number of resorts, such as health and SPA resorts Druskininkai (Alytus county), Birštonas (Kaunas county), Goldap (Elcki subregion), Augustow and Supraśl (Białostocki subregion). The health and SPA resorts feature resources of mineral waters, curative mud, favourable microclimate of surrounding pine forests, etc., which are accompanied by the relevant tourism infrastructure (hotels, sanatoriums, SPA centres, etc.).

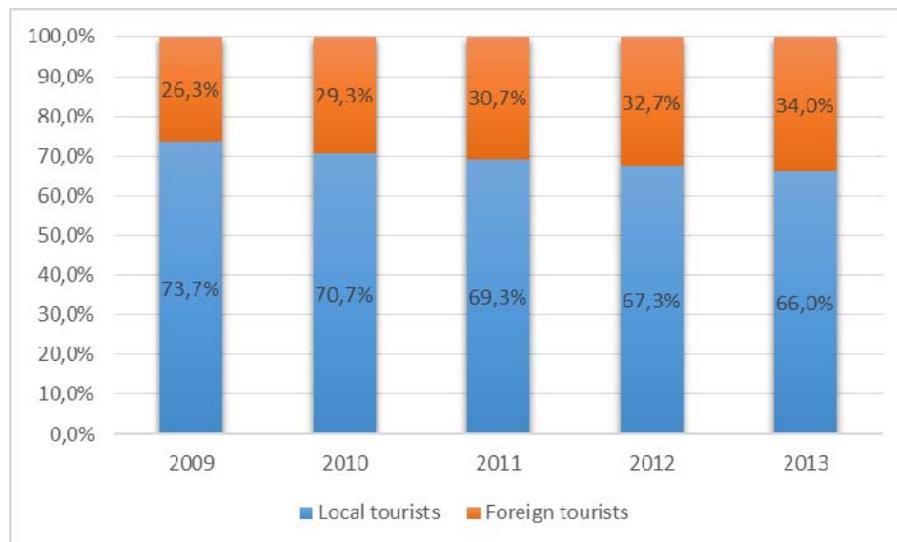
Rich natural and cultural heritage and the existence of relevant tourism infrastructure and resorts create preconditions for the Programme territory to be an attractive tourist region. This can also be illustrated by the steady growth of number of tourists in the Programme regions (Fig. 1) which

amounted to 39,8 % in the period of 2009 - 2013. Total increase in the amount of tourists in Lithuanian regions of the Programme area was 56,6%, while in regions of Poland - 26,5%.



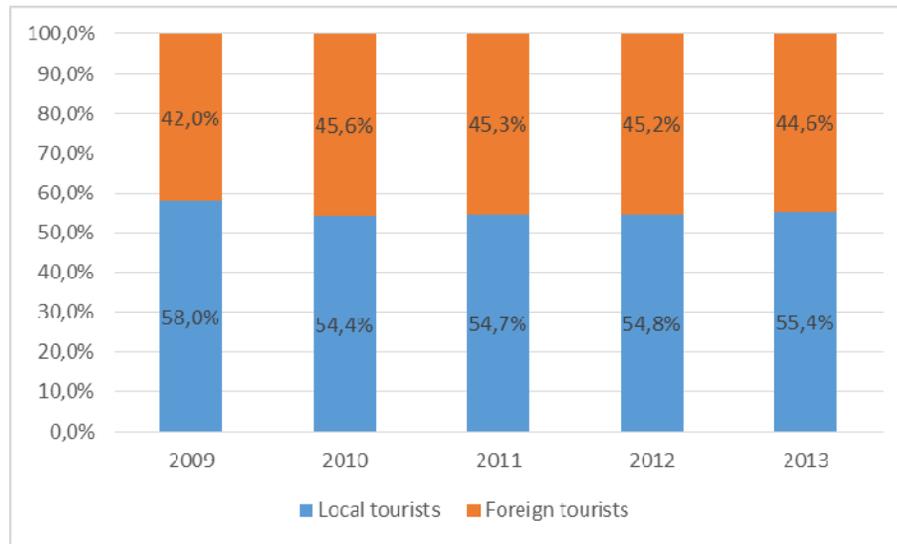
**Fig. 1. Trends in the number of tourists in the Programme area**

The largest part of the increase was induced by growing number of foreign travellers (Fig. 2), their share has increased from 26,3 % to 34,0 % of all tourists in the period of 2009 - 2013. Nevertheless local tourists still constitute a major part of all the tourists in the Programme area and the capacities of international tourism are still not fully utilised.



**Fig. 2. The structure of the tourists' flow in the Programme area**

Detailed analysis shows quite different structure of tourists among regions of the Programme area. The share of foreign tourists is relatively stable in Lithuania and constitutes nearly half of all the tourists (Fig. 3), while in Poland this share is much lower but has experienced a higher relative growth in recent years (Fig. 4). On the one hand, this shows a high capacity of local tourism market in Poland (which could be related to large size of the country, etc.), on the other, this reflects a high potential to attract foreign tourists – a sphere where cross border cooperation may be of high importance (common tourism routes, exchange of experience etc.).

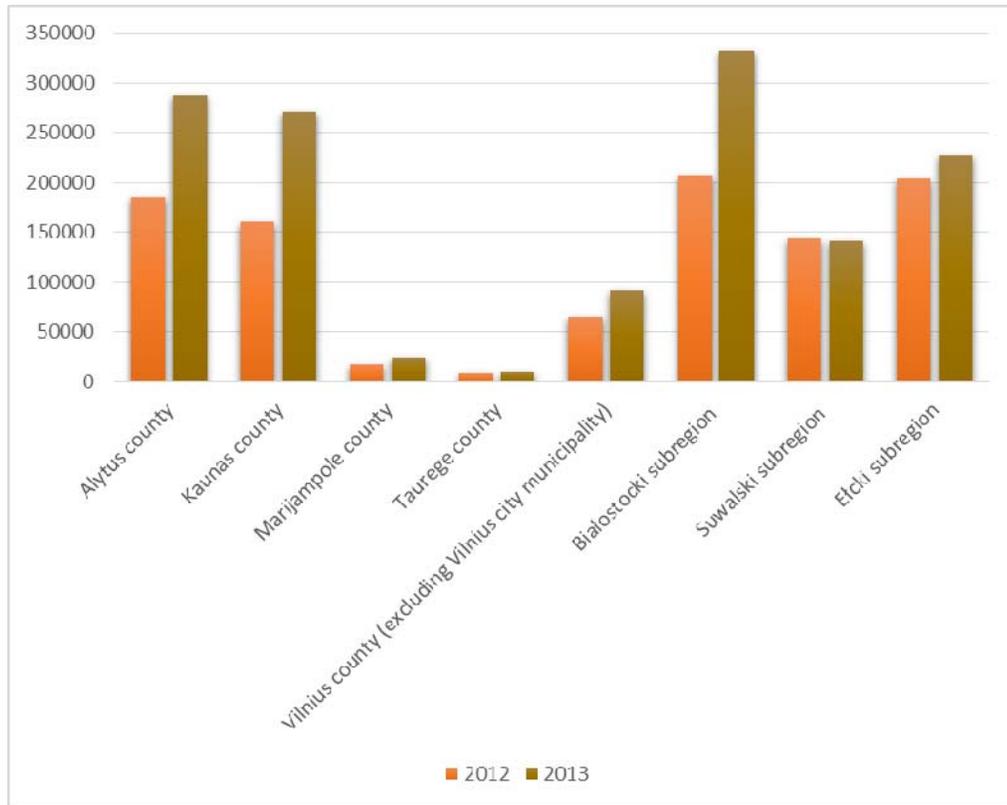


**Fig. 3. Tourists structure in the Programme regions of Lithuania**



**Fig. 4. Tourists structure in the Programme regions of Poland**

The number of tourists in different regions of the Programme significantly varies (Fig. 5). The highest increase in the number of tourists as well as the total number of tourists in the past years was experienced in Alytus, Kaunas, Bialostocki and Elcki regions. An increase in the other regions of the Programme area was much lower or negligible. Therefore interventions of the IP could be concentrated on Alytus, Kaunas, Bialostocki and Elcki regions where the level of tourism development and tourism potential is the highest. Inclusion of the main tourism attractions from other Programme regions, where tourism is less developed, would foster tourism development in these regions as well.



**Fig. 5. Number of tourists in different regions of the Programme**

As natural and historical heritage is still underused in the Programme territory, coordinated CBC actions aimed at adaptation of this heritage for tourism needs, development and promotion of joint tourism routes could greatly facilitate the development of this economic sector.

It is important to mention that cross border cooperation allows reaching synergy effects in creation of common tourism routes, provision of more and larger variety of tourism attractions and services. All this would promote longer duration of a tourist stay, decrease seasonal effects, etc. Mutual cultural understanding and common activities would also create preconditions for future cooperation in other fields.

### ***Lessons drawn from 2007-2013 LT-PL CBC Programme***

Sub-priority 1.3 of the 2007-2013 LT-PL CBC Programme “Development of sustainable cross-border tourism and preservation of cultural/historical heritage” was focused on projects related to the development and improvement of quality of joint tourism products, services and their diversification, joint tourism marketing, promotion of the region’s common image, improvement/establishment of small-scale tourism related cross-border infrastructure and renovation of cultural/historical heritage objects of cross-border importance. Thus the objectives of the selected TO6 and IP 6 (c) would be very similar and would continue investments targeted under the sub-priority 1.3 of the 2007-2013 LT-PL CBC Programme.

Sub-priority 1.3 was the main area of interest for the project promoters in the period of 2007–2013. Total value of the applications submitted exceeded 100 MEUR and due to high competition among

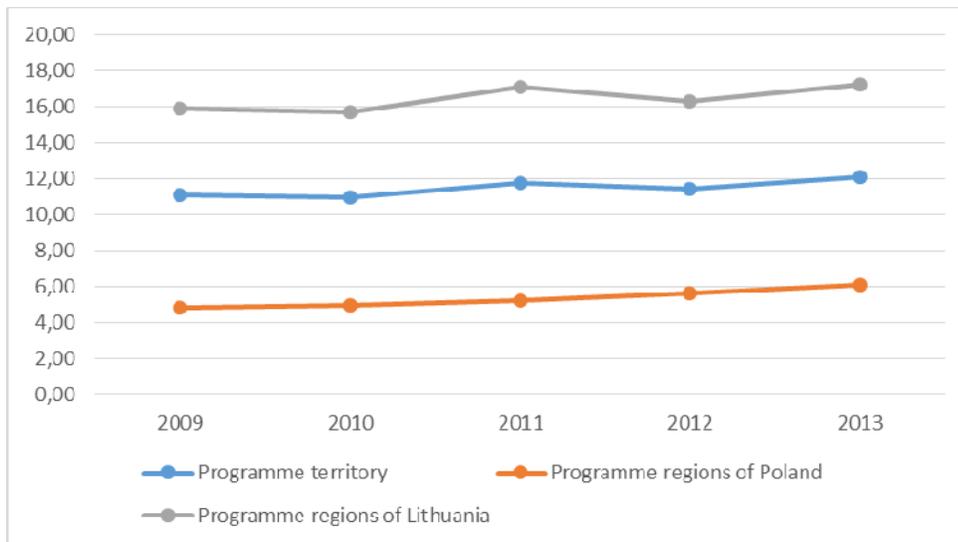
project applicants only around 30 % of the projects were financed. This shows a huge demand for investments in this area and selection of the TO and relevant IP is fully justified by the experience of 2007-2013 LT-PL CBC Programme implementation.

**TO8: Promoting sustainable and quality employment and supporting labour mobility**  
**IP8(a): Supporting the development of business incubators and investment support for self-employment, micro-enterprises and business creation**

***National and regional needs and potential for development***

One of the features of the labour market in the Programme territory is that the majority of the employed persons work either in less profitable low- and medium-tech industries or in agriculture. The wages and disposable incomes of people in the Programme region are lower than national averages. One of the possible measures to correct this situation is promotion of entrepreneurship and increasing of the number of self-employed persons in the regions.

The level of entrepreneurship in the Programme regions is also relatively low and lies below the national averages. One of the indicators reflecting the level of entrepreneurship is the number of business entities per 1000 inhabitants (Fig. 6).



**Fig. 6. Number of new business entities per 1000 inhabitants<sup>3</sup>**

Despite being lower than the national averages the level of entrepreneurship in the Programme territory is increasing (9,3 % increase in the period of 2009–2013); however, the growth rates significantly vary in the different regions of the Programme. In the Programme regions of Poland the number of business entities per 1000 inhabitants is lower than the corresponding number in the Programme regions of Lithuania but the growth rate is higher - 26,4 % in 2009–2013. The corresponding growth rate in the Programme regions of Lithuania was 8,1 % in 2009–2013. Such

<sup>3</sup> Statistical data includes private sector commercial enterprises without natural persons conducting economic activity.

situation of entrepreneurship provides good opportunities for cross-border cooperation and sharing of experience as the regions of both countries, on the one hand, face similar problems (low level of entrepreneurship), on the other hand, have different experience (relatively higher level of entrepreneurship is recorded in Lithuanian regions while the growth rate is higher in the Programme regions of Poland).

Low level of income and relatively low entrepreneurship combined with high unemployment in the area leads to the negative balance of net migration (Table 4), especially among youth and ageing population. The exclusively positive net migration was recorded in Białostocki subregion only. Therefore an important measure to deal with these issues is fostering of economic activity through various business acceleration programmes, youth entrepreneurship projects and similar activities.

**Table 4. Net migration in Lithuania and Poland**

	2006	2007	2008	2009	2010	2011	2012
<b>Lithuania</b>	<b>-24645</b>	<b>-21774</b>	<b>-16453</b>	<b>-32013</b>	<b>-77944</b>	<b>-38178</b>	<b>-21257</b>
<b>Alytus county</b>	-1594	-1515	-1518	-1867	-5349	-2436	-1841
<b>Kaunas county</b>	-4829	-4139	-2745	-6778	-17612	-8621	-4784
<b>Marijampole county</b>	-1827	-1623	-1510	-2143	-4126	-2251	-2100
<b>Taurage county</b>	-1619	-1689	-1462	-1719	-3503	-1730	-1278
<b>Vilnius county, excluding Vilnius city</b>	-127	366	661	-1172	-3980	-1398	-2201
<b>Poland</b>	<b>-36134</b>	<b>-20485</b>	<b>-14865</b>	<b>-1196</b>	<b>-2114</b>	<b>-4334</b>	<b>-</b>
<b>Białostocki subr.</b>	30	83	147	285	523	402	-
<b>Suwalski subr.</b>	-1075	-1025	-689	-670	-633	-824	-
<b>Łtcki subr.</b>	-1075	-900	-635	-707	-550	-449	-

Promotion of cooperation between business support organisations, implementation of business acceleration programmes, youth entrepreneurship projects, promotion of various forms of business cooperation, search of partners, exchange of experience and best practices among the staff of business support organisations, organisation of common trainings and other activities could make a significant difference in the economic life of the Programme area. The cross-border aspect of the support would bring benefit to the regions by fostering cooperation and providing much higher potential for possible business initiatives.

#### ***Lessons drawn from 2007-2013 LT-PL CBC Programme***

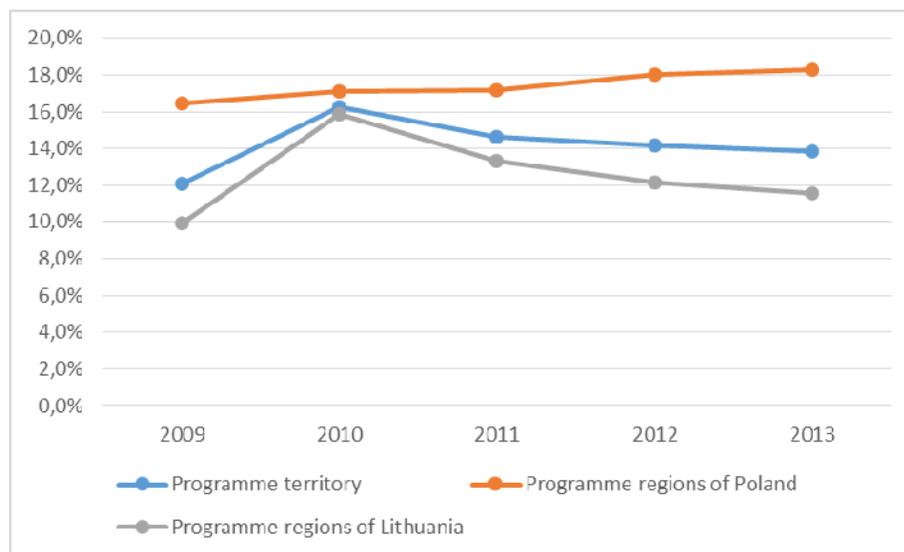
In 2007–2013 LT-PL CBC Programme business support activities were financed under sub-priority 1.2. “Promotion of business environment” and were focused on the promotion of co-operation (especially scientific and technological), exchange of experiences, implementation of joint initiatives, diversification of economic activities, improvement of the investment climate with the focus on SMEs. These activities allowed building up experience of implementation of joint projects, establishing cooperation networks and creating a solid foundation for future initiatives. Broader scope of possible activities in 2014 – 2020 period would allow implementing a larger variety of projects and reaching

significant positive effects on many aspects of economic life of the regions: employment, GDP, level of living, etc. Though statistically only a fraction of projects proposed in this area were approved, the broader list of activities in the 2014–2020 period as well as positive trends of entrepreneurship allows forecasting higher demand for investments in this area while the comprehensiveness of impact of the activities helps justifying the necessity and importance of the selected activities.

**TO8: Promoting sustainable and quality employment and supporting labour mobility**  
**IP8(a(i) ETC): Promoting sustainable and quality employment and supporting labour mobility by integrating cross-border labour markets, including cross-border mobility, joint local employment initiatives, information and advisory services and joint training**

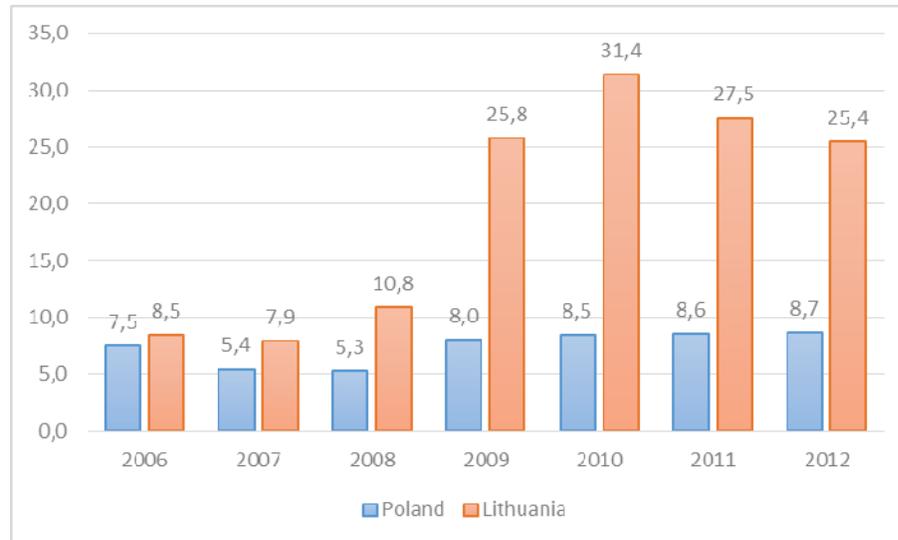
***National and regional needs and potential for development***

High unemployment level is one of the main issues in the Programme area. The level of unemployment in the Programme regions was 13,9 % in 2013 (Fig. 7) and was higher than the corresponding national averages. Major impact on the level of unemployment was made by the financial crisis in 2008-2009, and by the end of 2010 the level of unemployment reached 16,3 percent. Though the level is decreasing it is still higher than in 2009. Furthermore, unemployment is decreasing only in the Programme regions of Lithuania while in the Programme regions of Poland it has been increasing since 2009 with the highest level of unemployment recorded in Etcki subregion in 2013 - 25,9 %.



**Fig. 7. Level of unemployment in the Programme regions**

Another important problem of the Programme regions of Lithuania is youth unemployment (Fig. 8). While financial crisis had practically no influence on youth unemployment in Poland, in Lithuania it has increased the youth unemployment three times and only slight decrease has been recorded in the recent years.



**Fig. 8. Level of youth unemployment in Programme regions of Poland and Lithuania**

The differences of the situation on the regional and local labour markets in the Programme area are another important challenge as well as the opportunity to enhance cross-border co-operation. The relatively high unemployment level on both sides of the border is a potential area of cross border co-operation and joint efforts to deal with the common issue.

Given the downward employment trends in the public sector (the percentage of people employed in public sector has slightly decreased from 33,2 % in 2011 to 32,4 % in 2013 in Lithuania and from 30,8 % in 2010 to 28,9 % in 2012 in Poland) the growth of employment could mainly be fuelled by the increasing number of the employed in the private sector. Therefore an important measure to deal with unemployment is fostering of economic activity as foreseen in the IP8 (a) above. However, such activities as provision of information on cross-border possibilities, local employment initiatives including youth employment, youth exchange programmes, networking of educational institutions, joint study and training programmes, strengthening of institutional capacities to work with unemployed people and trainings for unemployed people could substantially contribute to tackling of unemployment.

### ***Lessons drawn from 2007-2013 LT-PL CBC Programme***

The second priority of TO8 only partly corresponds to the investment areas of 2007–2013 LT-PL CBC Programme sub-priority 2.2. “Improvement of living environment”, namely:

- Joint actions targeted at the improvement of employment opportunities and cross border employment;
- Joint actions aimed at the integration of socially vulnerable groups into the labour market;
- Joint education initiatives, elaboration of new education forms and programmes.

Joint initiatives implemented in the previous programming period have provided the necessary background in terms of established communication and cooperation links that would allow implementing a broader list of activities in 2014–2020 period. Both the needs for development and experience from the previous programming period justify the selection of the thematic objective and investment priority.

**TO9: Promoting social inclusion, combating poverty and any discrimination  
IP9 (a(ii) ETC) Promoting social inclusion, combating poverty and any discrimination by promoting gender equality, equal opportunities, and the integration of communities across borders**

***National and regional needs and potential for development***

National and regional needs of investments in the fields of social exclusion, poverty and discrimination could be illustrated by several important aspects:

- Both in Lithuania and Poland over 25% of population experience high risk of poverty and social exclusion. This percentage is even higher in the Programme regions due to their peripheral nature.
- The recent trends show ageing society which means that the demand for social services will increase in the future.

Due to the similarity of the problems, promotion of social inclusion and fight against poverty and discrimination could be seen as an issue of common interest where mutual cooperation and sharing of experience could be of great value. Active participation of local residents in various community initiatives is very important for the development of any region. It is especially important in less urbanised areas where provision of public and social services might be limited. Implementation of various cultural, social, educational initiatives, have a high potential for reducing the risk of social exclusion. Cooperation among neighbouring communities can even more facilitate the positive changes in the regions and the reduction of the aforementioned risk.

Active communities are a prerequisite for ensuring the quality of life. Development of social cross-border links and networks will allow sharing of experience and best practices among specialists and volunteers involved in dealing with various social groups that would in the end turn into better services. Integration of youth in cross-border social initiatives has a huge potential in fighting against social exclusion and discrimination. The social education aspect of such initiatives may have a significant positive impact on the development of a young person and therefore is very important.

Apart from the direct benefits on the society of the respective areas, created community and “people-to-people” cooperation networks build a necessary foundation for better understanding, future communication, cooperation and other joint initiatives.

***Lessons drawn from 2007-2013 LT-PL CBC Programme***

Experience of the 2007–2013 LT-PL CBC Programme shows a high demand for investments in this area. Activities of this thematic objective are similar to the ones that were financed under sub-priority 2.1 “Development of new and strengthening of existing co-operation and social and cultural networks” of the 2007–2013 LT-PL CBC Programme. The financing of this sub-priority covered cross-border co-operation in cultural and social areas. The *people-to-people* projects of this sub-priority probably best reflected the cross border cooperation aspects of the support. The area of intervention of this priority is usually underfinanced from national funds, therefore CBC and similar programmes are usually the

main sources of financing for these initiatives. Statistics from the previous period also shows that there was relatively high unsatisfied demand of investments in this area. Both the demand for funds and the difficult situation in the Programme areas as well as much room for cross border cooperation sustain the selection of the TO and the relevant IP.

**TO11: Enhancing institutional capacity of public authorities and stakeholders and efficient public administration  
IP11(a(iv) ETC) Enhancing institutional capacity of public authorities and stakeholders and efficient public administration by promoting legal and administrative cooperation and cooperation between citizens and institutions**

### ***National and regional needs and potential for development***

Effective public management is an important factor in the development of any country. Both Lithuanian and Polish Programme regions still have many issues in terms of effectiveness of public institutions. Though various reforms have already been implemented and there are signs of positive change in public management, the cross-border aspect of this issue has not been addressed in most cases. It is important to note that some policy issues could only be fully addressed with the actions carried out over a larger cross border area. Therefore national efforts may be insufficient to properly address the issues of a broader nature, such as environment, transport, safety, security. In such areas cross border aspect of cooperation is of crucial importance. For example, the lack of sufficient cross border public transport network connecting neighbouring communities is still one of the main obstacles for fruitful cooperation among neighbour regions. Due to complexity, the environmental issues can also be solved only if properly addressed by joint actions of the Programme regions. Joint efforts of public authorities and public service providers of neighbouring regions are of critical importance in these areas.

Nevertheless these issues provide good opportunities for cooperation between Programme countries, as the aforementioned problems are common for both sides. Support to public authorities and stakeholders as well as creation of infrastructure of common interest are important priorities of the Programme as mutual cooperation, sharing of experience and best practices could greatly facilitate the development of public services. Joint initiatives in the dissemination of good practices in public institutions and successful cross-border cooperation in this area could be a good stimulus for other sectors and promote social, cultural and economic cooperation.

### ***Lessons drawn from 2007-2013 LT-PL CBC Programme***

The new priority continues activities that were financed by sub-priorities 1.1 “Modernisation of small-scale economic infrastructure” and 2.2 “Improvement of living environment” of the 2007-2013 LT-PL CBC Programme. Statistically this might be treated as the most successful area of cooperation in terms of funds requested and projects approved as more than 70% of applications received the support. The largest share of the project promoters in this priority was public institutions that were the most active participants in all sub-priorities of the 2007-2013 LT-PL CBC Programme. As it will be already the third programming period of the Programme, the already established communication networks and experience of the project promoters on the one hand provide a good starting point for new, more

focused initiatives and even better cross-border cooperation, and, on the other hand, require additional initiatives to keep that communication alive and developed further.

As the selected TO and corresponding IP cover large scope of activities that proved to be both highly demanded and successful in the previous programming period, they can be treated as well grounded and fully justified.

## **2.2. The Internal Coherence of the Programme**

Ex-ante evaluation questions addressed in this Chapter (Article 55 of CPR):  
 (b) the internal coherence of the proposed Programme or activity and its relationship with other relevant instruments;  
 (f) how the expected outputs will contribute to results.

Programme combines 4 priority axes and 5 IPs/SOs. Consequently, a very limited number of selected IPs results in rather broad SOs. In this respect the 2014-2020 LT-PL CBC Programme is similar to the 2007-2013 LT-PL CBC Programme, which combines 2 priority axes divided into 5 sub-priorities (Table 5).

**Table 5. Structure of 2007–2013 LT-PL CBC Programme**

<p><b>Priority 1. Competitiveness and productivity growth of the cross-border region</b></p> <ul style="list-style-type: none"> <li>- Modernisation of small-scale economic infrastructure</li> <li>- Promotion of business environment</li> <li>- Development of sustainable cross-border tourism and preservation of cultural/historical heritage</li> </ul>
<p><b>Priority 2. Cross-border cohesion and enhanced overall quality of the cross-border area</b></p> <ul style="list-style-type: none"> <li>- Development of new and strengthening of existing co-operation and social and cultural networks</li> <li>- Improvement of living environment</li> </ul>

Lessons learned from implementation of the 2007–2013 LT-PL CBC Programme show that such wide priorities and sub-priorities were beneficial for the programme – projects were generated following “bottom-up” approach, limited number of priorities and sub-priorities reduced fragmentation of the Programme, allowed easier identification of actual sub-priorities for project promoters and allowed for implementation of complex and comprehensive projects.

Similar approach would be also beneficial for the implementation of the 2014-2020 LT-PL CBC Programme, which only determines wide IPs/SOs and the applicants would present project applications proposing specific solutions related to the defined SOs (“bottom-up” approach).

The reconstructed intervention logic (logical framework) of the Programme<sup>4</sup> and the assessment of its internal coherence are presented in Tables 6-10 below.

### ***Preserving and protecting the environment and promoting resource efficiency by conserving, protecting, promoting and developing natural and cultural heritage***

<sup>4</sup> Building the logical framework: Results are based on Specific objectives and Result indicators; Outputs – on Output indicators; Activities – on Actions to be supported under the IP. Logical framework is reconstructed on the level of IP.

**Table 6. Intervention logic of IP 1.1**

Results	Comments
<p>Increase of sustainable use of natural and cultural heritage for tourism in cross-border area (measured by: increased number of tourists accommodated in the Programme territory).</p>	<p>The result and result indicator reflects the change the intervention intends to bring to CBC region, however due to a small financial volume the Programme would influence indicator's value only to a very limited extent.</p> <p>It is important to note, that changes in the number of tourists in the Programme region would depend on a number of external factors (general financial situation, other public and private investments to the development of tourism sector (outside the scope of the Programme), ecological situation of the region, etc.). To exploit synergies with other EU, national and regional programmes and also with private investments, the Programme should seek integration of various natural and cultural attractions (which were developed and adapted using various sources of financing) into joint tourism routes.</p> <p>The value of the result indicator would be established on the basis of official statistic data; therefore relative administrative burden would be very low.</p>
Outputs	Comments
<ul style="list-style-type: none"> <li>• Heritage sites developed or adapted for tourists needs;</li> <li>• Joint tourism routes developed;</li> <li>• Natural and cultural heritage objects and related products promoted.</li> </ul>	<p>Outputs and output indicators in general reflect the main foreseen interventions (activities) of the IP (development and adaptation of natural and cultural heritage for tourism, development of joint tourism routes, promotion activities).</p> <p>At the same time outputs and output indicators do not reflect foreseen networking and demonstration activities – joint trainings, networking, joint cultural, art, educational activities, etc., which could be measured e.g. by the number of joint events, number of participants in joint events, etc. However, these activities could be regarded as complimentary to the main actions of the IP (and their inclusion in output monitoring framework is optional).</p> <p>The outputs and output indicators framework does not include common ETC output indicator</p>

	<p>“Increase in expected number of visits to supported sites of cultural and natural heritage and attractions”. Despite the fact, that IP would support interventions targeted at development of sustainable tourism, investments would be concentrated on general development of tourism routes, development of public tourism infrastructure, promotion of a region as a single tourism destination, etc., and predictably only a very limited share of funds would be contributed to the development of sites of cultural and natural heritage (such as museums, etc.) were it would be possible to calculate number of visitors. Taking this into account the above mentioned common output indicator does not reflect the essence of the planned interventions and should not be included in the Programme.</p>
Activities	Comments
<ul style="list-style-type: none"> <li>• Development of joint tourism routes based on natural and cultural heritage. This activity would include mostly soft measures (e.g. preparation and publication of information and promotion material about tourism objects and tourism routes) and small scale public tourism infrastructure (e.g. production and installation of information boards and signs, installation of rest and recreation areas);</li> <li>• Joint activities targeted at promotion of a region as a single tourism destination;</li> <li>• Implementation of joint cultural, art, educational activities for tourists in natural and cultural heritage sites;</li> <li>• Conservation, preservation and adaptation or development of natural and cultural heritage for tourism purposes and social, cultural, educational and other community purposes as well, if that contributes to more attractive sites for tourists;</li> <li>• Joint training of staff and exchange of staff aiming to increase capacities of natural and cultural heritage management, development of joint tourism products</li> </ul>	<p>The foreseen activities are consistent with and would contribute to the achievement of the expected outputs and the specific objective of the investment priority (increasing sustainable use of natural and cultural heritage for <b>tourism</b> in cross-border area).</p> <p>The activities foreseen under the last 2 bullet points (<i>joint training and exchange of staff...</i> and <i>transfer of good practices...</i>) are overlapping and could be combined. This would add clarity to the Programme.</p>

<p>and services, marketing of the heritage resources of CP area and other related capacities;</p> <ul style="list-style-type: none"> <li>• Transfer of good practices between beneficiaries (natural and cultural heritage management, development of joint tourism products and services, marketing of the heritage resources and other related practices).</li> </ul>	
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***Promoting sustainable and quality employment and supporting labour mobility by supporting the development of business incubators and investment support for self-employment, micro-enterprises and business creation***

**Table 7. Intervention logic of IP 2.1**

Results	Comments
<p>Promoted business creation, development and cooperation through improved business support services (measured by: business entities registered over the last year per 1000 inhabitants).</p>	<p>The foreseen result and result indicator reflect the change the intervention intends to bring to CBC region, however due to a small financial volume the Programme would influence indicator’s value only to a very limited extent. Moreover, the result indicator reflects only one target area of the intervention (promotion of business creation), while other areas (promotion of business development and cooperation) are not directly addressed. On the other hand, promotion of business creation is very important for the sustainable employment and respectively – for the selected TO.</p> <p>Alternative indicator of <i>business entities per 1000 inhabitants</i> could be used for IP. Such indicator would reflect both business creation and business development. The negative aspect of such indicator (<i>business entities per 1000 inhabitants</i>) is its more static nature (it mainly consists of historical data on enterprises already established and operating) and consequently it is harder to influence the value of the indicator by the respective interventions.</p> <p>The values of the result indicators (both <i>business entities registered over the last year per 1000 inhabitants</i> and alternatively <i>business entities per 1000 inhabitants</i>) would be established on the basis of official statistic data; therefore relative</p>

	<p>administrative burden would be very low.</p> <p>It is also important to note, that changes in the number of newly created business entities (or a total number of business entities) per 1000 inhabitants would heavily depend on such factors as general macroeconomic situation (growth or decline of the economy, crises, economic expectations and trends, etc.), business environment, taxation, etc.</p>
Outputs	Comments
<ul style="list-style-type: none"> <li>• New or upgraded joint (or promoting cooperation) services for business;</li> <li>• Persons participated in joint trainings and events.</li> </ul>	<p>Outputs and output indicators in general reflect the main foreseen interventions (activities) of the IP (development of cross border business support services), however output monitoring framework does not include indicators, related to monitoring of immediate results – how many enterprises were served by the improved business support services. Therefore output monitoring framework could be complemented with additional common ETC output indicator: “Number of enterprises receiving non-financial support”.</p> <p>As the Programme will not provide direct support to private businesses, other common ETC output indicators (such as Number of enterprises receiving support, Number of enterprises receiving grants, Number of enterprises receiving financial support other than grants, Number of new enterprises supported, Private investment matching public support to enterprises (grants), Private investment matching public support to enterprises (non-grants), etc.) are not relevant to the Programme.</p>
Activities	Comments
<ul style="list-style-type: none"> <li>• Cooperation activities between business support organisations (e.g. business incubators, science and technology parks, business advice centres, chambers of commerce) across the border;</li> <li>• Joint development and implementation of business acceleration programmes and apprenticeship programmes;</li> <li>• Joint development and implementation of youth entrepreneurship projects aimed at</li> </ul>	<p>The foreseen activities are consistent with and would contribute to the achievement of the expected outputs and specific objective of the IP, however some activities could be presented in a more coherent and focused way:</p> <ul style="list-style-type: none"> <li>• Activities, related to capacity building and promotion of cooperation between business support organisations foreseen in bullet points 1, 6 and 8 (<i>cooperation activities..., joint trainings and exchange of</i></li> </ul>

<p>introducing business world, entrepreneurs and enterprises to youth, youth encouragement for self-employment and business creation etc.;</p> <ul style="list-style-type: none"> <li>• Cooperation activities between cluster members across the border;</li> <li>• Clusters and networks (including other forms of cooperation) development activities (joint marketing, joint events, etc.);</li> <li>• Joint trainings and exchange of staff between beneficiaries in order to increase capacities of business support organisations management and services provision, also for the purpose to develop or upgrade joint (or promoting cooperation) services for business;</li> <li>• Joint trainings, seminars and other events for youth, entrepreneurs, small and medium business and its personnel for business development and related issues;</li> <li>• Transfer of good practice between beneficiaries (in order to increase capacities of business support organisations management and services provision).</li> </ul>	<p><i>staff... , transfer of good practice...)</i> are overlapping and could be presented in a more integrated and coherent way;</p> <ul style="list-style-type: none"> <li>• Activities foreseen in bullet points 4 and 5 emphasise clustering, which is a very advanced form of business cooperation (and currently there are no active clusters in the Programme territory, which would include members both from LT and PL). Taking this into account, these activities should be retargeted and broadened up to promotion of general business cooperation and networking (search of partners, development of business networks, etc.), clustering could be one of cooperation forms;</li> <li>• Activities foreseen in bullet point 7 partly overlap with activities foreseen in bullet points 2 and 3 (as trainings, seminars and other events are tools used for implementation of business support programmes/projects).</li> </ul>
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***Promoting sustainable and quality employment and supporting labour mobility by integrating cross-border labour markets, including cross-border mobility, joint local employment initiatives, information and advisory services and joint training***

**Table 8. Intervention logic of IP 2.2**

Results	Comments
<p>Decreasing unemployment through coordinated cross-border employment initiatives (measured by: share of participants in employment 6 months after leaving joint project aimed at promotion of employment (calculating those participants that were unemployed at the moment of involvement into project activities)).</p>	<p>The result and result indicator reflect the change the intervention intends to bring to the CBC region. The result indicator reflects the direct impact on project participants (i.e. those directly affected by the intervention) and taking into account small financial volume of the Programme this could be regarded as a suitable level for monitoring of results (as the Programme’s impact on the overall employment situation in the whole</p>

	CBC region would be very limited).
<b>Outputs</b>	<b>Comments</b>
<ul style="list-style-type: none"> <li>• Participants in joint local employment initiatives and joint training;</li> <li>• Participants in cross-border mobility initiatives.</li> </ul>	Outputs and output indicators in general reflect the main foreseen interventions (activities) of the IP.
<b>Activities</b>	<b>Comments</b>
<ul style="list-style-type: none"> <li>• Provision of information and counselling on labour market in CP area in order to increase cross-border mobility;</li> <li>• Joint development and implementation of local employment initiatives and joint trainings;</li> <li>• Joint development and implementation of youth employment initiatives and youth exchange programmes;</li> <li>• Networking of educational institutions for contribution to better match between skills and the needs of labour market of the region;</li> <li>• Implementation of joint study and trainings programmes in line with labour market needs;</li> <li>• Transfer of good practices between beneficiaries aiming to increase capacities to implement cross-border mobility, local employment and other employment initiatives;</li> <li>• Exchange of experience and joint training activities for beneficiaries aimed at strengthening capacities to work with unemployed people, people seeking changes in career, youth and communities;</li> <li>• Joint trainings for unemployed people, also people seeking changes in career, youth, communities.</li> </ul>	<p>The foreseen activities are consistent with and would contribute to the achievement of the expected outputs and the specific objective of the investment priority, however some activities could be presented in a more coherent and focused way:</p> <ul style="list-style-type: none"> <li>• Activities foreseen in bullet points 6 and 7 (<i>transfer of good practices... and exchange of experience and joint training...</i>) are overlapping and could be combined;</li> <li>• Activities foreseen in bullet point 4 could also include labour market institutions (not only educational institutions);</li> <li>• Activities foreseen in bullet point 8 partly overlap with activities foreseen in bullet points 1, 2 and 3 (as trainings are one of the tools used for implementation of activities foreseen in bullet points 1–3).</li> </ul>

***Promoting social inclusion, combating poverty and any discrimination by promoting gender equality, equal opportunities, and the integration of communities across borders***

**Table 9. Intervention logic of IP 3.1**

<b>Results</b>	<b>Comments</b>
<p>Stronger, more active, open-minded, durably cooperating cross-border community (measured by: Local communities, which have established or maintained durable cross-border cooperation links (maintaining co-operation links at least 12 months after project completion)).</p>	<p>The result and result indicator are related to the integration of communities across borders (and reflect relevant change the intervention intends to bring to the CBC region – stronger, more active, open-minded, durably cooperating cross-border community).</p> <p>As the foreseen activities concentrate on promotion of social inclusion, combating poverty and any discrimination, the intervention logic of the IP could be understood that common actions of local communities related to promotion of social inclusion, combating poverty and any discrimination (and relevant capacity building) would contribute to strengthening and integration of communities across borders.</p>
<b>Outputs</b>	<b>Comments</b>
<ul style="list-style-type: none"> <li>• Participants in projects promoting gender equality, equal opportunities and social inclusion across borders;</li> <li>• NGOs involved in cross-border cooperation for social inclusion.</li> </ul>	<p>Outputs and output indicators in general reflect the main foreseen interventions (activities) of the IP.</p>
<b>Activities</b>	<b>Comments</b>
<ul style="list-style-type: none"> <li>• Implementation of joint events and other initiatives (e.g. cultural, social, educational, other) aiming at social inclusion, combating poverty and any discrimination;</li> <li>• Activities aiming at building durable social cross-border links and networks (soft activities, small scale infrastructure development, minor changes in public spaces);</li> <li>• Engagement of different groups endangered by social exclusion, poverty and discrimination in cross-border cooperation (e.g. cultural, social, educational, etc.);</li> <li>• Fostering involvement of vulnerable</li> </ul>	<p>The foreseen activities are consistent with and would contribute to the achievement of the expected outputs and the specific objective of the IP.</p> <p>Activities foreseen under in bullet point 5 (joint activities promoting healthy lifestyle) duplicate activities foreseen under 4.1 IP (TO 11). If activities under different IPs would be implemented by different beneficiaries or would have different target groups, this should be explained.</p>

<p>persons and groups of the society (especially children and adults with special needs arising from disability, old age, poverty, etc.) in social life by means of cross-border communities integration;</p> <ul style="list-style-type: none"> <li>• Joint activities promoting healthy lifestyle and sports activities for communities;</li> <li>• Joint trainings and exchange of staff for beneficiaries working with communities in order to strengthen capacities of developing social integration and networking initiatives, involvement of vulnerable youth, etc.;</li> <li>• Joint trainings for communities in order to strengthen capacities for cross-border cooperation and networking, etc.;</li> <li>• Transfer of good practices between beneficiaries and between communities.</li> </ul>	
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***Enhancing institutional capacity of public authorities and stakeholders and efficient public administration by promoting legal and administrative cooperation and cooperation between citizens and institutions***

**Table 10. Intervention logic of IP 4.1**

<b>Results</b>	<b>Comments</b>
<p>Intensified cross-border cooperation of the institutions in all fields of public life in order to develop more integrated and better quality public governance and services in the CP area (measured by: institutions, which have established or maintained durable cross-border cooperation links (maintaining co-operation links at least 12 months after project completion)).</p>	<p>The foreseen results and result indicator reflect the change the intervention intends to bring to the CBC region.</p>
<b>Outputs</b>	<b>Comments</b>
<ul style="list-style-type: none"> <li>• Institutions involved in the cross border cooperation;</li> <li>• Persons participated in joint trainings or exchange of staff;</li> <li>• New or upgraded health care and social services for cross border region.</li> </ul>	<p>Outputs and output indicators in general reflect the main foreseen interventions (activities) of the IP.</p>

Activities	Comments
<ul style="list-style-type: none"> <li>• Setting and upgrading systems for cross-border public services provision in the CP area;</li> <li>• Legal and administrative cooperation between authorities and public services providers across the border;</li> <li>• Cooperation activities (e.g. joint trainings and exchange of staff of beneficiaries; infrastructure necessary for cooperation) between public service providers across the border;</li> <li>• Joint implementation of social programmes;</li> <li>• Joint implementation of healthcare programmes;</li> <li>• Joint activities promoting healthy lifestyle;</li> <li>• Investments in healthcare and social services infrastructure for cross-border use;</li> <li>• Transfer of good practices between beneficiaries (provision of public services, local and regional governance).</li> </ul>	<p>The foreseen activities in general are consistent with and would contribute to the achievement of the expected outputs and the specific objective of the IP. The scope of activities of the IP are very broad and include some interventions, which would be usually addressed under TO9 (e.g. joint implementation of social programmes, joint implementation of healthcare programmes, joint implementation of healthcare programmes, joint activities promoting healthy lifestyle, investments in healthcare and social services infrastructure for cross-border use). On the other hand, a broad IP reduces fragmentation of the Programme (as explained at the beginning of this Chapter).</p> <p>Activities foreseen in bullet point 6 (joint activities promoting healthy lifestyle) duplicate activities foreseen under 3.1 IP (TO9). If activities under different IPs would be implemented by different beneficiaries or would have different target groups, this should be explained.</p> <p>Also activities, related to legal and administrative cooperation, cooperation and transfer of good practices foreseen under the bullet points 2, 3 and 8 are overlapping and could be presented in a more integrated and coherent way.</p> <p>The IP foresees investments in healthcare and social services infrastructure for cross-border use. During Programme implementation stage due attention should be paid to legal and administrative provisions, regulating provision of relevant services across borders.</p>

### **2.3. Relationships of the Programme with Other Instruments**

The ex-ante evaluation question addressed in this Chapter (Article 55 of CPR):

(b) the internal coherence of the proposed Programme or activity and its relationship with other relevant instruments.

The Programme region would benefit from a number of other programmes co-funded by the ESI Funds. In order for the Programme interventions to be efficient and effective, it is crucial to ensure proper co-ordination, complementarity and synergies between these programmes and to avoid overlapping. Information on the operational programmes of the structural and the Cohesion funds

covered by Investment for growth and jobs goal that would be implemented in the Programme region is provided below.

### Lithuania

EU structural and Cohesion funds support under Investment for growth and jobs goal in 2014-2020 period will be delivered through a single Lithuanian Operational Programme for EU Structural Funds 2014-2020 (2014-2020 LT OP). In addition to that, ESI funds will be provided through 1 OP supported from the European Agricultural Fund for Rural Development (EAFRD) and 1 OP supported from the European Maritime and Fisheries Fund (EMFF).

Information on the selected TOs of the 2014-2020 LT OP and their relationship with the 2014-2020 LT-PL CBC Programme is provided in Table 11 below.

**Table 11. Relationship with LT OP under Investment for growth and jobs goal**

Operational Programme	Selected TOs										
	TO1	TO2	TO3	TO4	TO5	TO6	TO7	TO8	TO9	TO10	TO11
2014-2020 Lithuanian OP	+	+	+	+	+	+	+	+	+	+	+

TOs selected under 2014-2020 LT-PL CBC Programme

### Poland

EU structural and Cohesion funds support under Investment for growth and jobs goal in 2014-2020 period will be delivered through 22 OPs:

- 3 national OPs co-financed by ERDF (OP Smart Growth, OP Digital Poland, OP Development of Eastern Poland);
- 1 national OP co-financed by ERDF and CF (OP Infrastructure and Environment);
- 1 national OP co-financed by CF (OP Technical Assistance);
- 1 national OP co-financed by ESF (OP Knowledge, Education, Development);
- 16 regional multi-fund OPs co-financed by ERDF and ESF (2 of these OPs will be active in the Programme region – OP Podlaskie and OP Warminsko-Mazurskie).

In addition to that ESI Funds will be provided through 1 OP supported from the EAFRD and 1 OP supported from the EMFF.

Information on the selected TOs of the Polish OPs active in the Programme region and relationship with the 2014-2020 LT-PL CBC Programme is provided in Table 12 below.

**Table 12. Relations with PL OPs under Investment for growth and jobs goal**

Operational Programme	Selected TOs										
	TO1	TO2	TO3	TO4	TO5	TO6	TO7	TO8	TO9	TO10	TO11
OP Smart Growth	+		+								
OP Digital Poland		+									

Operational Programme	Selected TOs										
	TO1	TO2	TO3	TO4	TO5	TO6	TO7	TO8	TO9	TO10	TO11
OP Development of Eastern Poland			+	+			+				
OP Infrastructure and Environment				+	+	+	+		+		
OP Knowledge, Education, Development								+	+	+	+
OP Podlaskie	+	+	+	+		+	+	+	+	+	
OP Warminsko-Mazurskie	+	+	+	+	+	+	+	+	+	+	

TOs selected under 2014-2020 LT-PL CBC Programme

### ***Cross-border cooperation programmes***

The Programme regions will also participate in a number of other CBC programmes financed by the ERDF under ETC objective and ENI. Information about these programmes and participation of the Programme regions is presented in Table 13 below.

**Table 13. Relations with other ERDF and ENI CBC programmes**

2014-2020 LT-PL CBC Programme Regions	PL-DK-DE-LT-SE (SouthBaltic) ERDF CBC Programme	LV-LT ERDF CBC Programme	LT-RU ENI CBC Programme	LV-LT-BY ENI CBC Programme	PL-RU ENI CBC Programme	PL-BY-UA ENI CBC Programme
Alytus county				+		
Kaunas county		+	+	+		
Marijampolė county			+			
Tauragė county	+		+			
Vilnius county				+		
Bialostocki subregion						+
Suwalski subregion					+	+
Elcki subregion					+	

### ***Coordination of the Programme with OPs under Investment for growth and jobs goal and other ERDF and ENI CBC programmes***

As described above, the Programme territory will benefit from a number of OPs funded under Investment for growth and jobs goal and CBC programmes financed by the ERDF and ENI. The contribution of these programmes to the Programme region would be considerably higher than the overall budget of the 2014-2020 LT-PL CBC Programme.

Therefore, the funds of the 2014-2020 LT-PL CBC Programme should be allocated to projects that would demonstrate the strongest CBC effects, would be best targeted at promotion of cooperation links between relevant actors of LT and PL regions and would contribute to social and economic development on both sides of the border. Such approach would help to ensure proper coordination and synergies with other programmes implemented in the Programme region.

## **2.4. The Consistency of the Allocation of Budgetary Resources with the Objectives of the Programme**

The ex-ante evaluation question addressed in this Chapter (Article 55 of CPR):

c) the consistency of the allocation of budgetary resources with the objectives of the Programme

Information on allocation of funds among priority axes of the 2014–2020 LT-PL CBC Programme is presented in Table 14 below.

**Table 14. Allocation of funds**

Priority axis	Specific objective	Union support	National counterpart	Total funding
<b>1. Preserving and protecting the environment and promoting resource efficiency</b>	To increase the sustainable use of natural and cultural heritage for tourism in cross-border area	16.476.203,20	2.907.565,27	19.383.768,47
<b>2. Promoting sustainable and quality employment and supporting labour mobility</b>	To promote business creation, development and co-operation through improved business support services	11.970.991,39	2.112.527,89	14.083.519,28
	To decrease unemployment through coordinated cross border cooperation actions			
<b>3. Promoting social inclusion, combating poverty and any discrimination</b>	To support a stronger, more active, open-minded, durably cooperating cross-border community	7.980.660,92	1.408.351,93	9.389.012,85
<b>4. Enhancing the institutional capacity of public authorities and stakeholders and an efficient public administration</b>	To intensify cross-border cooperation of the institutions in all fields of public life in order to develop more integrated and better quality public governance and services in the CP area	11.970.991,39	2.112.527,89	14.083.519,28
<b>5. Technical assistance</b>	To ensure fluent and effective CP implementation	3.089.288,10	545.168,49	3.634.456,59

Priority axis	Specific objective	Union support	National counterpart	Total funding
<b>Total</b>		<b>51.488.135,00</b>	<b>9.086.141,47</b>	<b>60.574.276,47</b>

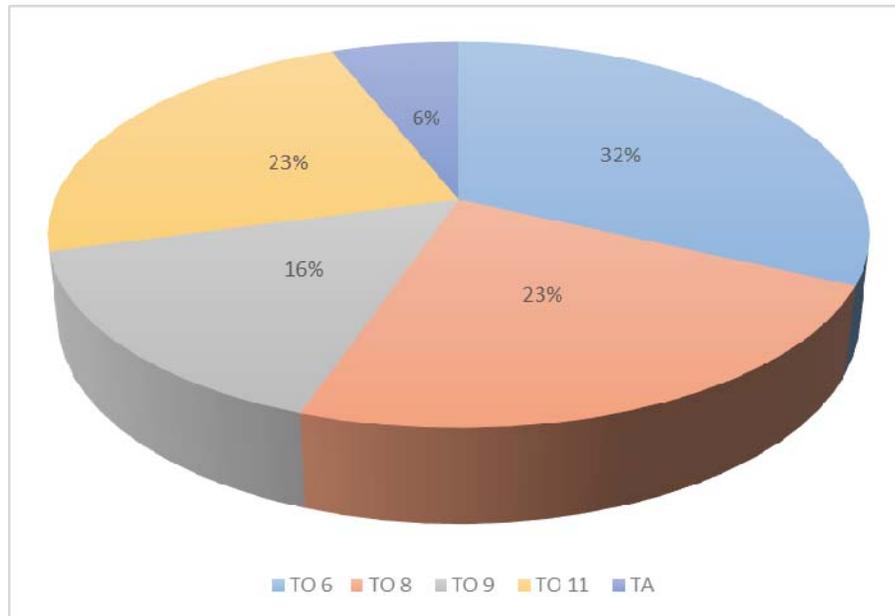
In comparison with the 2007-2013 LT-PL CBC Programme the overall budget of the 2014 – 2020 LT-PL CBC Programme has decreased by more than 30% – from 87,2 MEUR to 60,6 MEUR. This means that fewer projects would be financed, which puts a challenge for the programming stage to define the most important priorities and for the implementation stage to select and implement the most beneficial projects.

The allocation of funding for the priorities in the 2014–2020 period has been evaluated taking into account the following aspects:

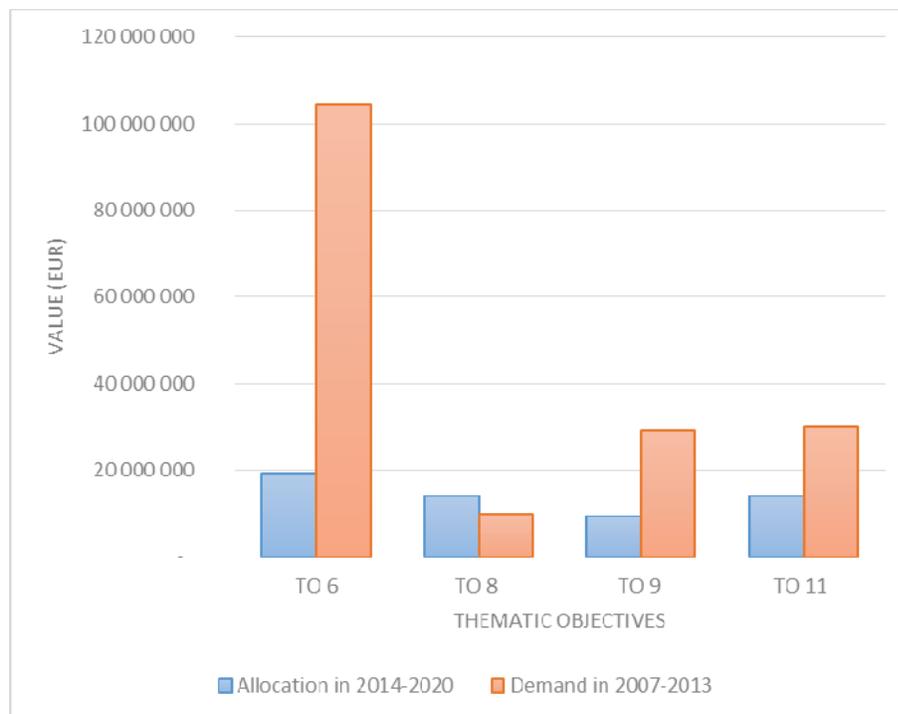
- Lessons learned during the previous programming period (demand for funds for similar areas of support under the 2007-2013 LT-PL CBC Programme);
- Main characteristics of the priority axes related to the demand for funds (presence and the anticipated volume of capital investments vs soft measures, etc.);
- Strategic importance of the selected TOs and IPs (including strategic documents of both European, national and regional levels).

***Priority axis 1. Preserving and protecting the environment and promoting resource efficiency***

Among the priorities of 2014 – 2020 LT-PL CBC Programme the largest share of funding (32% - 19.383.768 EUR) is allocated for the priority axis 1 (TO6: Preserving and protecting the environment and promoting resource efficiency) (Fig. 9). Under this priority support for development of cultural and natural heritage for tourism would be provided, area of support is similar to sub-priority 1.3 of the 2007-2013 LT-PL CBC Programme. Investments in this field were the main area of interest for the project promoters in the period of 2007–2013. The value of applications received was more than 100 MEUR (Fig. 10). Due to high competition among project applications only around 30% of the projects were financed. This shows a huge demand for investments in this area. Furthermore the priority axis includes infrastructure investments that are more capital intensive and require bigger allocation. Due to the aforementioned, the allocation of funds is well justified.



**Fig. 9. Allocation of funds among thematic objectives in 2014–2020**



**Fig. 10. Comparison of demand for funds in 2007–2013 and allocation of funds in 2014–2020**

**Priority axis 2. Promoting sustainable and quality employment and supporting labour mobility**

The amount of funds allocated for the priority axis 2 (TO8: Promoting sustainable and quality employment and supporting labour mobility) is 23% – 14.083.519 EUR. TO covers two IPs with the first one continuing the support for the business support services which were financed under sub-priority 1.2 of the 2007-2013 LT-PL CBC Programme and the second one dedicated to unemployment related initiatives. As these investment priorities (especially the second investment priority) only partly

correspond with the investment areas (sub-priorities) of the 2007–2013 period the demand of funds for TO8 cannot be directly linked with the demand under the 2007-2013 LT-PL CBC Programme. Also, as there were not many applications in this area in the previous programming period, there might be a need to use additional promotion tools to ensure sufficient amount of quality project applications in this area. However, high level of unemployment in the Programme territory combined with the employment priorities set in strategic documents for 2014 – 2020 justifies relatively high allocation of funds in this area.

### ***Priority axis 3. Promoting social inclusion, combating poverty and any discrimination***

The amount of funds allocated for the priority axis 3 (TO9: Promoting social inclusion, combating poverty and any discrimination) is 16% – 9.389.013 EUR. Priority axis continues activities that were financed under sub-priority 2.1 of the 2007-2013 LT-PL CBC Programme. In comparison with the previous programming period the amount of funds for investments in the sphere of social inclusion and social cohesion has suffered the largest relative decrease – more than 50 percent – from 19,1 MEUR in the period of 2007–2013 to 9,4 MEUR in 2014–2020. The value of applications received in 2007–2013 in this field was approximately 29,2 MEUR. However despite large amount of funds allocated and high demand expressed in calls for proposals in 2007–2013, by the end of 2013 only 11,7 MEUR were contracted.

As the majority of projects in this thematic objective are small initiatives from local communities and NGOs and projects comprised mainly “soft” components, the decrease of funds should not be regarded as insufficient attention for such an important topic. Taking into account the general decrease of funding for the 2014-2020 LT-PL CBC Programme and actual amount of the contracted projects under 2007-2013 LT-PL CBC Programme, the allocated amount for the priority axis could be regarded as duly justified.

### ***Priority axis 4. Enhancing the institutional capacity of public authorities and stakeholders and an efficient public administration***

The amount of funds allocated for the priority axis 4 (TO11: Enhancing the institutional capacity of public authorities and stakeholders and an efficient public administration) is 23% - 14.083.519 EUR. Together with TO8 this is the second/third largest priority in terms of allocated funding. The financial scope could be first of all justified by the very wide area of support covering many areas of public administration and public services (local and regional governance, health and social care, responding to emergency situations and natural disasters, joint management of natural assets, etc.) and inclusion of infrastructure elements (such as investments in healthcare and social services infrastructure for cross-border use as well as infrastructure necessary for cooperation between public service providers in other fields). As the new priority only partly corresponds to the sub-priorities 1.1 and 2.2 of the previous programming period, the analysis of demand for funds can not be straightforwardly based on the calls for proposals in the period of 2007-2013 . Approximate value of funds requested in 2007–2013 for the activities that would fall within the new priority axis 4 was estimated to be 30 MEUR (including 2 strategic projects) and 21,2 MEUR (including 2 strategic projects) of these were contracted by the end of 2013.

Such aspects as a broad scope of the priority, experience of project promoters from the previous programming periods and established communication networks among institutions create the necessary preconditions for successful absorption of funds.

**Technical assistance**

Amount of funds allocated for TA constitutes 6% for the total amount allocated to CP. Although this is the maximum amount limited by the ETC regulation, the following aspects need to be taken into account:

- As the whole Programme budget has decreased, there was a corresponding decrease of more than 28% of funding for TA – from 5,1 MEUR to 3,6 MEUR;
- Although decrease of Programme funds generally means reduction of the relevant administrative workload (mainly related to project administration – evaluation of applications, conclusion of grant agreements, processing of applications for reimbursement, etc.), many elements of Programme administration are fixed and do not directly depend on the value of the Programme – e.g. preparation of work procedures, development of IT systems, web page, organisation of monitoring committee meetings, etc.
- Change of administration of Small Project Fund (SPF) – SPF will be under direct administration of Joint Secretariat (JS) (in 2007-2013 SPF was implemented as an “umbrella” project). Subsequently the administration of SPF would constitute additional workload for JS and now would be financed from TA instead of the “umbrella” project budget.

Taking into account the aforementioned, allocation of maximum 6% of funds for TA is reasonable and well grounded.

**2.5. The Consistency of the Programme with the Europe 2020 Strategy and other strategic documents**

The ex-ante evaluation question addressed in this Chapter (Article 55 of CPR):  
 (d) the consistency of the selected thematic objectives, the priorities and corresponding objectives of the Programme with the CSF, the Partnership Agreement and the relevant country specific recommendations adopted in accordance with Article 121(2) TFEU and where appropriate at national level, the National Reform Programme.

The results of the evaluation of the consistency of the Programme and selected TOs, IPs and corresponding SOs with the Europe 2020 strategy, CSF (in particular the part of the CSF directly related to the CBC programmes – please see Table 16), the Partnership Agreement<sup>5</sup>, country specific recommendations and national reform programmes are presented in Table 15 below.

**Table 15. Consistency of the Programme with the Europe 2020 strategy**

Priority axis	Specific objective	Consistency with the Europe 2020 strategy and other strategic documents
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<sup>5</sup> Following the provisions of Art. 15(1)a.vii of CPR, ETC programmes are reflected in the Partnership Agreement only to a limited extent

Priority axis	Specific objective	Consistency with the Europe 2020 strategy and other strategic documents
<p><b>TO6. Preserving and protecting the environment and promoting resource efficiency</b></p>	<p>To increase the sustainable use of natural and cultural heritage for tourism in cross-border area</p>	<p><b>Common Strategic Framework</b></p> <p>The selected TO, IP and SO would contribute to the promotion and sustainable use of natural resources for tourism development of the Programme territory therefore are consistent with the the provisions of CSF.</p> <p>Art. 7.2.2 of CSF: Member States and regions shall, in the areas concerned, seek to draw on cross-border and transnational cooperation to: a) ensure that areas that share major geographical features (islands, lakes, rivers, sea basins or mountain ranges) support the joint management and <b>promotion of their natural resources</b>.</p> <p><b>Partnership Agreements</b></p> <p><b>Lithuania</b></p> <p>TO6 corresponds to the list of TOs selected for ETC CBC programmes indicated in Chapters 2.1.1. “Internal coordination of ESI funds, ETC programmes and EU BSRS” and 3.1.4 “The priority areas of cooperation of ESI funds, where appropriate, taking into account the macro-regional strategies” of the Partnership Agreement for Lithuania.</p> <p>The selected TO, IP and SO would complement the “mainstream” ESI Funds programmes active in the Programme territory and would contribute to the development of cross border cooperation aimed at realisation of tourism potential of the region.</p> <p><b>Poland</b></p> <p>TO6 falls within the list of TOs most important for ETC indicated in Chapter 3.3.4 “Territorial cooperation and regional strategies” of the Partnership Agreement for Poland. The Partnership Agreement indicates that tourism potential in LT-PL border region currently is not fully utilised and should be reinforced, investments should be directed at promotion of cross-border tourism and joint regional products, which would improve the region’s image and would attract potential tourists and investors.</p> <p><b>Contribution to the Europe 2020 strategy, headline targets and flagship initiatives</b></p>

Priority axis	Specific objective	Consistency with the Europe 2020 strategy and other strategic documents
		<p>Realisation of the tourism potential of the cross border region would contribute to the economic growth and creation of new work places and thus would contribute to the Europe 2020 headline targets related to employment.</p> <p>Also the selected TO, IP and SO would contribute to enhancing the competitiveness of the European tourism sector, which is addressed by the Europe 2020 flagship initiative “An industrial policy for the globalisation era”, and would contribute to the Europe 2020 priority of sustainable growth.</p>
<p><b>TO8. Promoting sustainable and quality employment and supporting labour mobility</b></p>	<p>To promote business creation, development and co-operation through improved business support services</p> <p>To decrease unemployment through coordinated cross border employment initiatives</p>	<p><b>Common Strategic Framework</b></p> <p>The selected TO, IPs and SOs would contribute to strengthening cross-border labour market services to foster the mobility of workers across borders and would promote SME creation and competitiveness; therefore, they are consistent with the provisions of CSF.</p> <p>Art. 7.2.2 of CSF: Member States and regions shall, in the areas concerned, seek to draw on cross-border and transnational cooperation to: d) achieve critical mass, particularly in the field of research and innovation and ICT, education and in relation to <b>measures improving the competitiveness of SMEs</b>; and e) <b>strengthen cross-border labour market services to foster the mobility of workers across borders</b>.</p> <p><b>Partnership Agreements</b></p> <p><b>Lithuania</b></p> <p>TO6 corresponds to the list of TOs selected for ETC CBC programmes indicated in Chapters 2.1.1. “Internal coordination of ESI funds, ETC programmes and EU BSRS” and 3.1.4 “The priority areas of cooperation of ESI funds, where appropriate, taking into account the macro-regional strategies” of the Partnership Agreement for Lithuania.</p> <p>The selected TO, IPs and SOs would complement the “mainstream” ESI Funds programmes active in the Programme territory and would contribute to the development of cross border cooperation aimed at promotion of business creation, development and co-</p>

Priority axis	Specific objective	Consistency with the Europe 2020 strategy and other strategic documents
		<p>operation and strengthening of cross-border labour market services aimed at promotion of employment and labour mobility.</p> <p><b>Poland</b> TO6 falls within the list of TOs most important for ETC indicated in Chapter 3.3.4 “Territorial cooperation and regional strategies” of the Partnership Agreement for Poland.</p> <p><b>Country specific recommendations</b> <b>Lithuania</b> The selected TO, IPs and SOs would contribute to implementation of Council recommendations for Lithuania adopted in accordance with Article 121(2) TFEU for the period 2014-2015, namely: 3) <b>Better target active labour market policy measures to the low-skilled and long-term unemployed.</b> Improve coverage and adequacy of unemployment benefits and link them to activation. <b>Address persistent skills mismatches by improving the labour market relevance of education and promote life-long learning. In order to increase employability of young people, prioritise offering quality apprenticeships and strengthen partnership with the private sector.</b> Review the appropriateness of labour legislation, in particular with regard to the framework for labour contracts and for working-time arrangements, in consultation with social partners.</p> <p><b>Poland</b> The selected TO, IPs and SOs would contribute to implementation of Council recommendations for Poland adopted in accordance with Article 121(2) TFEU for the period 2014-2015, namely: 2) <b>Strengthen efforts to reduce youth unemployment, notably by further improving the relevance of education to labour market needs, increasing the availability of apprenticeships and work-based learning places and by strengthening outreach to unregistered youth and the cooperation between schools and employers, in line with the objectives of a youth guarantee. Increase adult's participation in lifelong learning in order to adjust skills supply to skills demand.</b> Combat labour market</p>

Priority axis	Specific objective	Consistency with the Europe 2020 strategy and other strategic documents
		<p>segmentation by stepping up efforts to ensure a better transition from fixed-term to permanent employment and by reducing the excessive use of civil law contracts.</p> <p><b>Contribution to the Europe 2020 strategy, headline targets and flagship initiatives</b></p> <p>Development of business support services aimed at promotion of business creation, development and co-operation and strengthening cross-border labour market services aimed at promotion of employment and labour mobility would contribute to reduction of unemployment, creation and strengthening of SMEs and would hence contribute to the Europe 2020 headline targets related to employment.</p> <p>Also the selected TO, IPs and SOs would contribute to realisation of Europe 2020 flagship initiatives “An industrial policy for the globalisation era”, “An Agenda for new skills and jobs” and Europe 2020 priorities of sustainable growth and inclusive growth.</p>
<p><b>TO9. Promoting social inclusion, combating poverty and any discrimination</b></p>	<p>To support a stronger, more active, open-minded, durably cooperating cross-border community</p>	<p><b>Partnership Agreements</b></p> <p><b>Lithuania</b></p> <p>TO6 corresponds to the list of TOs selected for ETC CBC programmes indicated in Chapters 2.1.1. “Internal coordination of ESI funds, ETC programmes and EU BSRS” and 3.1.4 “The priority areas of cooperation of ESI funds, where appropriate, taking into account the macro-regional strategies” of the Partnership Agreement for Lithuania.</p> <p>The selected TO, IP and SO would complement the “mainstream” ESI Funds programmes active in the Programme territory and would contribute to the development of cross border cooperation aimed at promotion of social inclusion, combating poverty and any discrimination and strengthening of cross-border community.</p> <p><b>Poland</b></p> <p>TO6 falls within the list of TOs, most important for ETC indicated in Chapter 3.3.4 “Territorial cooperation and regional strategies” of the Partnership Agreement for Poland. The Partnership Agreement also emphasizes</p>

Priority axis	Specific objective	Consistency with the Europe 2020 strategy and other strategic documents
		<p>the need to support small projects for local community cooperation (especially in CBC component).</p> <p><b>Country specific recommendations</b>  <b>Lithuania</b>            The selected TO, IPs and SOs would contribute to implementation of Council recommendations for Lithuania adopted in accordance with Article 121(2) TFEU for the period 2014-2015, namely:  <b>4) Ensure adequate coverage of those most in need and continue to strengthen the links between cash social assistance and activation measures.</b></p> <p><b>Contribution to the Europe 2020 strategy, headline targets and flagship initiatives</b></p> <p>Development of cross border cooperation aimed at promotion of social inclusion, combating poverty and any discrimination and strengthening of cross-border community would contribute to reduction of people in or at risk of poverty and social exclusion and thus should contribute to the Europe 2020 headline target related to fighting poverty and social exclusion.</p> <p>The selected TO, IP and SO would also contribute to realisation of Europe 2020 flagship initiative “European Platform against Poverty” and Europe 2020 priority of inclusive growth.</p>
<p><b>TO11. Enhancing institutional capacity of public authorities and stakeholders and efficient public administration</b></p>	<p>To intensify cross-border cooperation of the institutions in all fields of public life in order to develop more integrated and better quality public governance and services in the CP area</p>	<p><b>Common Strategic Framework</b>            The selected TO, IP and SO would contribute to the efficiency of public governance and public services: strengthening planning and management of joint natural assets, infrastructure and public services of cross-border importance (including investments in healthcare and social services infrastructure for shared cross-border use), cooperation and joint actions to reinforce the capacities to respond to emergency situations, natural disasters and common challenges, as well as supporting knowledge transfer, capacity building and promotion of cooperation between public authorities and public service providers.</p>

Priority axis	Specific objective	Consistency with the Europe 2020 strategy and other strategic documents
		<p>Art. 7.2.2 of CSF: Member States and regions shall, in the areas concerned, seek to draw on cross-border and transnational cooperation to: <b>a) ensure that areas that share major geographical features (islands, lakes, rivers, sea basins or mountain ranges) support the joint management and promotion of their natural resources; b) exploit the economies of scale that can be achieved, in particular with regard to investment related to the shared use of common public service; and f) improve cross-border governance.</b></p> <p><b>Partnership Agreements</b>  <b>Lithuania</b>            TO6 corresponds to the list of TOs selected for ETC CBC programmes indicated in Chapters 2.1.1. “Internal coordination of ESI funds, ETC programmes and EU BSRS” and 3.1.4 “The priority areas of cooperation of ESI funds, where appropriate, taking into account the macro-regional strategies” of the Partnership Agreement for Lithuania.</p> <p>The selected TO, IP and SO would complement the “mainstream” ESI Funds programmes active in the Programme territory and would contribute to the development of cross border cooperation aimed at promotion of efficiency of public governance and public services.</p> <p><b>Poland</b>            TO6 falls within the list of TOs most important for ETC indicated in Chapter 3.3.4 “Territorial cooperation and regional strategies” of the Partnership Agreement for Poland. The Partnership Agreement highlights the importance of closer cooperation of public institutions and improving the quality of life by increasing access to health care and social services in LT-PL border region.</p> <p><b>Contribution to the Europe 2020 strategy, headline targets and flagship initiatives</b></p> <p>Strengthening of the public governance and public services efficiency and promotion of cross-border cooperation would contribute to the development of better social and economic environment and thus</p>

Priority axis	Specific objective	Consistency with the Europe 2020 strategy and other strategic documents
		would help to pursue Europe 2020 priorities of smart, sustainable and inclusive growth.

**Table 16. Common Strategic Framework**

Common Strategic Framework (Annex I of CPR)

...

7.2 Cross-border, transnational and interregional cooperation under the ERDF

...

2. Member States and regions shall, in the areas concerned, seek to draw on cross-border and transnational cooperation to:

- (a) ensure that areas that share major geographical features (islands, lakes, rivers, sea basins or mountain ranges) support the joint management and promotion of their natural resources;
- (b) exploit the economies of scale that can be achieved, in particular with regard to investment related to the shared use of common public services;
- (c) promote coherent planning and development of cross-border network infrastructure, in particular missing cross-border links, and environmentally friendly and interoperable transport modes in larger geographical areas;
- (d) achieve critical mass, particularly in the field of research and innovation and ICT, education and in relation to measures improving the competitiveness of SMEs;
- (e) strengthen cross-border labour market services to foster the mobility of workers across borders;
- (f) improve cross-border governance.

## 2.6. Indicators

The ex-ante evaluation questions addressed in this Chapter (Article 55 of CPR):

- (e) the relevance and clarity of the proposed Programme indicators;
- (g) whether the quantified target values for indicators are realistic, having regard to the support envisaged from the ESI Funds.

The indicators proposed in the Programme draft have been evaluated taking into account the requirements set in CPR, Guidance document on ex-ante evaluation and other relevant methodological documents.

The Programme's **output** indicators have been evaluated taking into account the following criteria:

- Relevance – output indicators should reflect the actions to be supported under the IP and should be logically connected to SO and the relevant result indicator(s);
- Clarity – output indicators should have a clear title, an unambiguous and easy to understand definition;
- Quantified target values – the quantified target values for output indicators should be realistic having regard to the Programme's budget. The target values of the indicators have been assessed taking into account the calculated unit costs of indicators and, where possible, comparison of these unit costs to those achieved in the framework of the 2007-2013 LT-PL CBC Programme.

The Programme includes rather limited number of output indicators (2-3 per SO). Taking into account rather broad SOs and the fact that supply of project applications will follow “bottom-up” approach<sup>6</sup>, it is reasonable to have a limited number of output indicators, which would be relevant to the significant part of activities addressed under corresponding SO.

The Programme’s **result** indicators have been evaluated taking into account the following criteria:

- Relevance – result indicators should reflect the SO and should provide information on the progress towards the change that the Programme and respective SO intend to bring to the Programme region. To be relevant, result indicators should also be responsive to the policy. However, given the width of the Programme territory and relatively small financial volume, the Programme would influence the actual values of result indicators related to TO6 “Number of tourists accommodated in the CP territory” and TO8 “Number of business entities registered over the last year per 1000 inhabitants in the CP territory” only to a very limited extent;
- Clarity – result indicators should have a clear title and an unambiguous and easy to understand definition. Following the requirements of CPR, result indicators should also be robust, statistically valid and clear in terms of normative interpretation;
- Quantified target values – the quantified target values for result indicators should be realistic. The target values of indicators have been assessed taking into account the expected effects of the actions and the produced outputs, past experience (relevant historical data) as well as other external developments and trends potentially influencing them.

Another important aspect, against which the indicators have been assessed, is the administrative burden related to the establishment of indicator’s value. Taking into account limited financial scope of the Programme, indicators which would cause significant administrative burden should be avoided (e.g. determination of indicator’s value would be subject to special studies, etc.). Instead, indicators should be based on the project implementation data presented by the project beneficiaries in project reports<sup>7</sup> and data of official statistics<sup>8</sup>.

To ensure consistent interpretation of indicators between project promoters and Programme management institutions and to ensure correctness and consistency of aggregated data on the achievement of indicators, detailed methodology on calculation and reporting of indicators should be prepared at the initial stages of Programme implementation.

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<sup>6</sup> Moreover, it is virtually impossible to predict what project applications will be submitted and consequently selected for funding.

<sup>7</sup> Including sustainability reports submitted after project completion.

<sup>8</sup> In the case of result indicators.

Table 17. Assessment of Programme's result and output indicators

Indicator	Indicator Type (Result, Output)	Indicator Type (Specific, Common)	Measurement Unit	Baseline Value (Baseline Year)	Target Value (2023)	Source of Data	Relevance	Clarity	Suitability of Quantified Target Values	Comments
Number of tourists accommodated in the CP territory	R	S	Number	1.277.844 (2012)	1.446.071	Official statistics	+	+	-	<p>The proposed result indicator reflects the change the intervention intends to bring, however due to small financial volume the Programme would influence indicator's value only to a very limited extent.</p> <p>The target value of the indicator (the planned increase in the number of tourists accommodated in the CP territory from 2012 to 2023 constitutes only 13,2%) could be assessed as too conservative, as:</p> <ul style="list-style-type: none"> <li>• The number of tourists accommodated in the CP territory has increased by 39,8% in 2009–2013;</li> <li>• 65% of the planned increase till 2023 has already been reached in 2013 (number of tourists accommodated in the CP territory grew by 8,6% from 2012 to 2013).</li> </ul>
Number of heritage sites developed or adapted for	O	S	Sites	NA	7	Project reports	+	+	+	

Indicator	Indicator Type (Result, Output)	Indicator Type (Specific, Common)	Measurement Unit	Baseline Value (Baseline Year)	Target Value (2023)	Source of Data	Relevance	Clarity	Suitability of Quantified Target Values	Comments
tourists needs										
Number of joint tourism routes developed	O	S	Routes	NA	4	Project reports	+	+	+	
No of natural and cultural heritage objects and related products promoted	O	S	Objects and related products promoted	NA	40	Project reports	+	+/-	+	<p>Definition of the indicator is not entirely clear (what are the minimum requirements for an object or a product to be considered as “promoted”, etc.). Methodology for calculation of the indicator should be included in the Programme manual or other relevant document.</p> <p>As one tourism route would normally include at least 10 tourism objects and it is planned to develop 4 tourism routes, the value of quantified target is realistic.</p>
Number of business entities registered over the last year per 1000 inhabitants in the CP territory	R	S	Business entities <sup>9</sup> registered over the last year per 1000 inhabitants	4.88 (2012)	5.4	Official statistics	+/-	+	-	<p><i>Relevance</i></p> <p>The result indicator reflects the change the intervention intends to bring to CBC region, however due to a small financial volume the Programme would influence indicator’s value only to a very</p>

<sup>9</sup> For Lithuanian side of the border Statistics Department officially published by statistics on small and medium entities is used.

Indicator	Indicator Type (Result, Output)	Indicator Type (Specific, Common)	Measurement Unit	Baseline Value (Baseline Year)	Target Value (2023)	Source of Data	Relevance	Clarity	Suitability of Quantified Target Values	Comments
										<p>limited extent.</p> <p>In addition to that, the result indicator reflects only one target area of the intervention (promotion of business creation), while other areas (promotion of business development and cooperation) are not directly addressed. Therefore alternative indicator of <i>business entities per 1000 inhabitants</i> could be used for IP. Such indicator would reflect both business creation and business development dimensions. The negative aspect of such indicator (business entities per 1000 inhabitants) is its more static nature (it mainly consists of historical data on enterprises already established and operating) and consequently it is harder to influence the value of the indicator by the respective interventions.</p> <p><i>Quantified Value of Indicator</i> The baseline value of the indicator cannot be compared in the Programme region, as the PL data in addition to legal persons</p>

Indicator	Indicator Type (Result, Output)	Indicator Type (Specific, Common)	Measurement Unit	Baseline Value (Baseline Year)	Target Value (2023)	Source of Data	Relevance	Clarity	Suitability of Quantified Target Values	Comments
										<p>includes natural persons conducting economic activity, while the LT data includes only the number of legal persons (SMEs).</p> <p>Due to complexity of statistical data and differences in legislation regulating economic activity of natural persons, it is proposed to use only the data of legal persons – SMEs. The data from the Polish side should be corrected accordingly. The corrected baseline value of the indicator would be 1,74 (2013 data).</p>
Number of new or upgraded joint (or promoting cooperation) services for business	O	S	Services	NA	7	Project reports	+	+	+	
Number of persons participated in joint trainings and events	O	S	Persons	NA	700	Project reports	+	+	-	The value of the indicator is very conservative. Together with the indicator <i>Number of participants in joint local employment initiatives and joint training</i> the number of participants is 1400, while in the 2007-2013 LT-PL CBC Programme the value of similar indicator <i>No of people/youth participating in joint activities and events across the</i>

Indicator	Indicator Type (Result, Output)	Indicator Type (Specific, Common)	Measurement Unit	Baseline Value (Baseline Year)	Target Value (2023)	Source of Data	Relevance	Clarity	Suitability of Quantified Target Values	Comments
										<i>border</i> has already climbed over 41 800 <sup>10</sup> . The difference in the financial allocation does not justify such difference in the value of the indicator.
Share of participants in employment 6 months after leaving joint project aimed at promotion of employment (calculating those participants that were unemployed at the moment of involvement into project activities)	R	S <sup>11</sup>	Percent	0%	10%	Sustainability reports submitted after project completion by the beneficiaries	+	+	+/-	Reporting of the achievement of result indicators after project completion in general brings additional administrative burden to project beneficiaries. However, under the 2007-2013 LT-PL CBC Programme beneficiaries are requested to submit sustainability reports for 5 years after project completion. It is planned to use similar procedures for the implementation of the Programme (for the purpose of monitoring durability of operations pursuant to Art 71 of CPR), therefore the administrative burden related to the reporting of result indicator would be minor (as no additional reports would be required).  The value of the quantified target could be more ambitious (e. g. the target value of the result indicator of similar initiatives under

<sup>10</sup> 2007-2013 LT-PL CBC Programme Annual Implementation Report 2013

<sup>11</sup> Common for ESF interventions

Indicator	Indicator Type (Result, Output)	Indicator Type (Specific, Common)	Measurement Unit	Baseline Value (Baseline Year)	Target Value (2023)	Source of Data	Relevance	Clarity	Suitability of Quantified Target Values	Comments
										Lithuanian operational programme for 2014-2020 under investment for growth and jobs goal is 30%). On the other hand, the Programme is targeted at more peripheral and deprived regions, which may be reflected in the lower value of the quantified target.
Number of participants in joint local employment initiatives and joint training	O	C	Persons	NA	700	Project reports	+	+	-	The value of the indicator is too conservative. Please refer to the comment on the indicator <i>Number of persons participated in joint trainings and events</i> .
Number of participants in cross-border mobility initiatives	O	C	Persons	NA	100	Project reports	+	+	+	
Number of local communities, which have established or maintained durable cross-border cooperation links (maintaining co-operation links at least 12 months)	R	S	Communities	22 (2013)	32	Sustainability reports submitted after project completion by the beneficiaries	+	+	+	Reporting of the achievement of result indicators after project completion in general brings additional administrative burden to project beneficiaries. However, under the 2007-2013 LT-PL CBC Programme beneficiaries are requested to submit sustainability reports for 5 years after project completion. It is planned to use similar procedures for the

Indicator	Indicator Type (Result, Output)	Indicator Type (Specific, Common)	Measurement Unit	Baseline Value (Baseline Year)	Target Value (2023)	Source of Data	Relevance	Clarity	Suitability of Quantified Target Values	Comments
after project completion)										implementation of the Programme (for the purpose of monitoring durability of operations pursuant to Art 71 of CPR), therefore the administrative burden related to the reporting of the result indicator would be minor (as no additional reports would be required).
Number of participants in projects promoting gender equality, equal opportunities and social inclusion across borders	O	C	Persons	NA	2000	Project reports	+	+	+	
Number of NGOs involved in cross-border cooperation for social inclusion	O	S	NGOs	NA	20	Project reports	+/-	+	+	It is not entirely clear, why special attention is given to one group of potential beneficiaries. On the other hand, the experience from the 2007-2013 LT-PL CBC Programme shows that local and regional authorities were most active in the implementation of the Programme; moreover, stronger involvement of NGOs would be beneficial for the Programme, in particular for the

Indicator	Indicator Type (Result, Output)	Indicator Type (Specific, Common)	Measurement Unit	Baseline Value (Baseline Year)	Target Value (2023)	Source of Data	Relevance	Clarity	Suitability of Quantified Target Values	Comments
										integration of communities across borders.
Number of institutions, which have established or maintained durable cross-border cooperation links (maintaining cooperation links at least 12 months after project completion)	R	S	Institutions	46 (2013)	50	Sustainability reports submitted after project completion by the beneficiaries	+	+	-	<p>Reporting of the achievement of result indicators after project completion in general brings additional administrative burden to project beneficiaries. However, under the 2007-2013 LT-PL CBC Programme beneficiaries are requested to submit sustainability reports for 5 years after project completion. It is planned to use similar procedures for the implementation of the Programme (for the purpose of monitoring durability of operations pursuant to Art 71 of CPR), therefore administrative burden related to the reporting of the result indicator would be minor (as no additional reports would be required).</p> <p><i>Quantified Value of Indicator</i> The foreseen result indicator should correlate with the output indicator <i>Number of institutions involved in the cross border cooperation</i> below: from the total number of institutions involved in the cross border cooperation</p>

Indicator	Indicator Type (Result, Output)	Indicator Type (Specific, Common)	Measurement Unit	Baseline Value (Baseline Year)	Target Value (2023)	Source of Data	Relevance	Clarity	Suitability of Quantified Target Values	Comments
										(output indicator) a part would maintain durable cross-border cooperation links after project completion (result indicator). The current values of indicators are irrational, as the expected participation is 20 institutions, while 50 of them would maintain durable cross-border cooperation links after project completion.
Number of institutions involved in the cross border cooperation	O	S	Institutions	NA	20	Project reports	+	+	-	Please refer to the comment on the indicator above.
Number of persons participated in joint trainings or exchange of staff	O	S	Persons	NA	500	Project reports	+	+	+	
New or upgraded health care and social services for cross border region	O	S	Services	NA	5	Project reports	+	+	+	
<b>Technical Assistance</b>										<b>General comment on indicators for TA:</b> the indicators included in the Programme for TA concern only quantification of various administrative tasks related to implementation of the Programme

Indicator	Indicator Type (Result, Output)	Indicator Type (Specific, Common)	Measurement Unit	Baseline Value (Baseline Year)	Target Value (2023)	Source of Data	Relevance	Clarity	Suitability of Quantified Target Values	Comments
										<p>(number of ...), however there are no indicators, which would reflect the qualitative aspects and improvements of Programme implementing provisions, e. g. related to introduction of simplification measures and reduction of administrative burden on project beneficiaries (which could be measured by e.g. share of the Programme expenditure financed on the basis of simplified costs), etc.</p> <p>Even if qualitative indicators and aspects of the Programme administration won't be included into the Programme, these aspects should be properly addressed in the course of Programme monitoring exercise.</p>
Number of operations approved	O	S	Operations	NA	150	JMC decisions	+/-	+/-	+	<p>Successfully implemented projects would constitute the core of the Programme. As the approved operations may not turn into successfully implemented projects (as applicants may refuse to sign grant agreements or implement the projects), it is suggested to amend the indicator to "Number of implemented projects" (source</p>

Indicator	Indicator Type (Result, Output)	Indicator Type (Specific, Common)	Measurement Unit	Baseline Value (Baseline Year)	Target Value (2023)	Source of Data	Relevance	Clarity	Suitability of Quantified Target Values	Comments
										of data: “Decisions on approval of final consolidated project report”).  Taking into account the number of operations approved in the 2007-2013 LT-PL CBC Programme (including SPF projects) the value of indicator is realistic.
Number of Joint Monitoring Committee meetings	O	S	Meetings	NA	9	Annual implementation reports	+	+	-	Following Article 49(1) of CPR, the JMC shall meet at least once a year. As it may be expected that the first JMC meeting would take place in 2015 and the last meeting would take place at the end of 2024 or at the beginning of 2025 <sup>12</sup> , the minimum number of JMC meetings would be 10.  The target value of indicator could be even more ambitious taking into account the experience from the 2007-2013 LT-PL CBC Programme, where two JMC meetings were organised annually. However, reduction of the total Programme budget and corresponding reduction of TA budget may result in lower number of JMC meetings (at least

<sup>12</sup> Following Article 110(2)b of CPR functions of the JMC include examination of annual and final implementation reports. Following Articles 138 and 141(1) of CPR, the final implementation report shall be submitted to the EC not later than by 15 February 2025.

Indicator	Indicator Type (Result, Output)	Indicator Type (Specific, Common)	Measurement Unit	Baseline Value (Baseline Year)	Target Value (2023)	Source of Data	Relevance	Clarity	Suitability of Quantified Target Values	Comments
										once a year).  The source of the data could also be modified into “Minutes of JMC meetings” or similar, as annual implementation reports would represent only a secondary information source.
Number of organised events for publicity, information and capacity building about the CP	O	S	Events	NA	20	Publicity reports	+	+	+	
Number of publications and appearances in the media	O	S	Publications and appearances in the media	NA	15	Publicity reports	+	+	+	
Checks-on-spot of the projects	O	S	Checks-on-spot	NA	100	Checks-on-spot reports	+	+	+	

## 2.7. Performance Framework

The ex-ante evaluation question addressed in this Chapter (Article 55 of CPR):  
(k) the suitability of the milestones selected for the performance framework.

The milestones selected for the performance framework of the Programme combine **all** output indicators and financial indicators, thus the selected milestones represent the intended progress towards the targets set both at Programme and priority level.

The values of intermediate milestones established for 2018 represent 20% of the total target values set for 2023 for all output and financial indicators<sup>13</sup>. Despite the fact that the achievement of 2018 milestones would be significantly influenced by the time required to launch the Programme and select the projects<sup>14</sup>, the experience from the implementation of the 2007-2013 LT-PL CBC Programme shows that the financial milestones for 2018 could be more ambitious (by the end of 2011 the expenditure of the 2007-2013 LT-PL CBC programme constituted 38% of the total Programme budget). Similar situation would be with output indicators – the values of intermediate milestones could be more ambitious.

Further, the intermediate values of output indicators could be differentiated by the type of interventions – the achievement of output indicators related to “soft” activities (e.g. number of participants in trainings and events, number of institutions involved in cross border cooperation, etc.) tends to be proportional or even faster than the financial progress of the relevant interventions, while output indicators related to the development of infrastructure (e.g. number of heritage sites developed or adapted for tourists needs) are usually achieved only at the end of the relevant project (and the achievement of output indicators could be slower than the financial progress of the interventions).

## 2.8. Rationale of the Form of Support Proposed

The ex-ante evaluation question addressed in this Chapter (Article 55 of CPR):  
(h) the rationale for the form of support proposed.

The Programme will be implemented through non-repayable grants. This form of assistance is justified and could be assessed as the most suitable for the Programme taking into account that:

- The Programme would be directed at public projects, which will not generate net revenues;
- Programme beneficiaries would include local, regional and national authorities, public bodies and bodies governed by the public law, NGOs, public service providers, etc. The Programme will not provide direct support to private sector entities and will not provide state aid;
- It is necessary to ensure sufficient incentive to implement public projects of cross-border nature and in this respect non-repayable grants are the most suitable form of support;

<sup>13</sup> With small deviations related to rounding.

<sup>14</sup> Provisional timetable for launching the Programme: negotiations and approval of the Programme (end of 2015), setting of the management structures, preparation of documents and procedures, launching of calls for proposals (mid of 2015), submission of applications, evaluation and selection of projects, signature of grant agreements (beginning of 2016), start of project implementation (beginning-mid of 2016).

- Overall financial value of the Programme is very limited and therefore allocations to financial instruments will not be economically feasible (as related preparatory and administrative costs most likely would exceed the potential benefits);
- The Programme is built on the experience of the 2007-2013 PLT-PL CBC Programme that was implemented solely through non-repayable grants which have proved to be an effective form of support.

## 3. HORIZONTAL PRINCIPLES

### 3.1. Equal Opportunities

The ex-ante evaluation question addressed in this Chapter (Article 55 of CPR):

(l) the adequacy of planned measures to promote equal opportunities between men and women and to prevent any discrimination, in particular as regards accessibility for persons with disabilities.

The principle of equal opportunities would be horizontally addressed in all TOs of the Programme; specific activities aimed at strengthening capacities to work with unemployed people, joint trainings for unemployed people, implementation of joint events and initiatives promoting social inclusion and combating discrimination are foreseen in TO8 “Promoting sustainable and quality employment and supporting labour mobility” and TO 9 “Promoting social inclusion and combating poverty and any discrimination”. The activities under these TOs would have positive effects on implementation of the principle of equal opportunities and on combating discrimination. To follow the Programme outcomes in this sphere the output indicator (Number of participants in projects promoting gender equality, equal opportunities and social inclusion across borders) has been included into the Programme.

An important aspect of implementation of the Programme is that the compulsory declaration of beneficiary would include the commitment from the beneficiary to comply with national and EU law provisions guaranteeing gender equality. The Programme draft also foresees that the number of men and women participating in the activities of each operation would be monitored allowing to make corresponding conclusions during evaluations of the Programme.

It is also important to note that the criteria for assessment of quality of project applications in the 2007-2013 LT-PL CBC Programme included equal opportunity criteria and the projects with positive effect on equal opportunities were awarded with additional points. Such practice might be continued in the implementation of the 2014-2020 LT-PL CBC Programme.

### 3.2. Sustainable Development

The ex-ante evaluation question addressed in this Chapter (Article 55 of CPR):

(m) the adequacy of planned measures to promote sustainable development.

The Programme does not include large infrastructure or industrial projects and does not set the framework for future development consent for projects listed in Annexes I and II of the Environmental Impact Assessment (EIA) Directive<sup>15</sup>, therefore significant negative impacts on environment are unlikely.

<sup>15</sup> Directive 2011/92/EU of the European Parliament and of the Council of 13 December 2011 on the assessment of the effects of certain public and private projects on the environment

According to the results of the Environmental assessment, the Programme would have a positive impact on promotion of sustainable development in a number of areas:

- The Programme's investment priority "Conserving, protecting, promoting and developing natural and cultural heritage"<sup>16</sup> would have positive effects on natural resources, natural heritage sites, recreational environment, cultural heritage and protection;
- The Programme's investment priorities "Promoting sustainable and quality employment and supporting labour mobility by integrating cross-border labour markets, including cross-border mobility, joint local employment initiatives, information and advisory services and joint training and Promoting social inclusion, combating poverty and any discrimination by promoting gender equality, equal opportunities, and the integration of communities across borders"<sup>17</sup> would have positive effects on employment, education and community development;
- The Programme's investment priority "Enhancing the institutional capacity of public authorities and stakeholders and efficient public administration by promoting legal and administrative cooperation and cooperation between citizens and institutions"<sup>18</sup> would have positive effects on human health.

However, it shall be noted that small financial volume of the Programme would limit the Programme's impact on the overall sustainable development of the Programme region.

To secure and to maximise the Programme's inputs into the promotion of sustainable development, it is very important to ensure the sustainable development principles are integrated into the Programme implementation arrangements (procedures established for the evaluation of applications, management, monitoring and control of the projects, etc. should include provisions related to implementation of sustainable development principles).

It is also important to note that the criteria for assessment of quality of project applications in the 2007-2013 LT-PL CBC Programme included environmental criteria and the projects with positive effect on environment were awarded with additional points. Such practice might be continued in the implementation of the 2014-2020 LT-PL CBC Programme.

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<sup>16</sup> TO6, IP 6(c)

<sup>17</sup> TO8, IP 8(a)i and TO9, IP 9(a)ii

<sup>18</sup> TO11, IP 11(a)iv

## 4. IMPLEMENTING PROVISIONS

### **4.1. Adequacy of Human Resources and Administrative Capacity for the Management of the Programme**

The ex-ante evaluation question addressed in this Chapter (Article 55 of CPR):

(i) the adequacy of human resources and administrative capacity for management of the Programme.

The management structures envisaged for the administration of the Programme would be based on those used for the administration of the 2007-2013 LT-PL CBC Programme. Functions of the Managing Authority (MA), Audit Authority (AA), National Authority<sup>19</sup> (NA) and Joint Secretariat (JS) would be carried out by the same institutions as in the 2007-2013 period – the Ministry of the Interior of the Republic of Lithuania (MA and AA), the Ministry of Infrastructure and Development of the Republic of Poland (NA) and the public entity “Joint Technical Secretariat” (JS). It is important to note that the same structures were also involved in the administration of a number of other EU co-financed CBC programmes<sup>20</sup>.

One of the biggest changes in the management structures is related to the execution of functions of the Certifying Authority (CA). Following the provisions of Article 123 (3) of CPR, the functions of CA would be carried out by the MA itself (functions of the CA in 2007-2013 were discharged by the Ministry of Finance of the Republic of Lithuania). However, the execution of these new functions shouldn’t present too many challenges to the Ministry of Interior of the Republic of Lithuania, as the Ministry has experience in carrying similar functions in other EU programmes (e. g. management of the External Borders Fund and European Return Fund for the period 2007-2013).

To sum it up, such administrative setup would allow securing continuity of the administrative system, preserving experience related to the administration of the CBC programmes and ensuring that the Programme is managed by the institutions, which have adequate human resources and administrative capacity.

The biggest challenge in ensuring the adequacy of human resources and administrative capacity for the management of the Programme would be related to sufficiency of funding. Despite the fact that the maximum 6% of the total Programme’s budget<sup>21</sup> was allocated to TA, decrease of the total Programme’s budget has led to corresponding decrease in TA – TA funding decreased by more than 28% from 5,1 MEUR to 3,6 MEUR. Such decrease might lead to challenges in ensuring proper funding of Programme’s management structures (especially for JTS, as TA is the main or the sole source of funding):

- Although decreased amount of Programme funds generally means reduction of the relevant administrative workload (functions related to administration of the Programme on project level

<sup>19</sup> A co-operating institution, acting as the main partner for MA on the Polish side of the border.

<sup>20</sup> Lithuania, Poland and Kaliningrad Region of Russian Federation PHARE/TACIS Neighbourhood Programme; Lithuania, Poland and Kaliningrad Region of Russian Federation INTERREG IIIA/TACIS Neighbourhood Programme 2004-2006; Latvia-Lithuania-Belarus ENPI Cross Border Cooperation Programme 2007-2013 (for LT institutions); etc.

<sup>21</sup> Art. 17 of ETC regulation.

- less projects could be financed by the Programme, which leads to reduction in the number of grant agreements, applications for reimbursement, on-the-spot checks, etc.), many elements of the Programme administration are fixed and do not directly depend on the value of the Programme – e.g. preparation of work procedures, development of IT systems, web page, organisation of monitoring committee meetings, etc.
- Changes in the administration of SPF – SPF will be directly administered by JS (in 2007-2013 SPF was implemented as an “umbrella” project). Subsequently, the administration of SPF would constitute additional workload for JTS and now would be financed from the Technical assistance instead of the “umbrella” project budget.

To ensure sufficiency of TA funds, special attention should be paid to simplification and optimisation of the Programme management arrangements (wide use of simplified costs options, simplified procedures for SPF, etc.). Although at the initial stages of the Programme implementation simplification procedures might require additional efforts from the Programme management institutions (preparation of new documents and procedures, determination of flat-rates, unit costs and lump sums, development of IT tools, etc.), in the longer run they will reduce both the administrative burden to the beneficiaries and the administrative costs to JS.

## **4.2. Suitability of the Procedures for Monitoring the Programme**

The ex-ante evaluation question addressed in this Chapter (Article 55 of CPR):

(j) the suitability of the procedures for monitoring the Programme and for collecting the data necessary to carry out evaluations.

The Programme monitoring tasks would be carried out by the JMC, MA, NA and JS. It is important to note, that the Programme monitoring arrangements in general are consistent with and would be based on those used for the administration of the 2007-2013 LT-PL CBC Programme, which would ensure continuity of the system.

Monitoring of the Programme on project level would be carried out by the JS. Monitoring of the projects would be based on the information presented by the beneficiaries in consolidated progress and final reports, on-the-spot monitoring visits, information received from other bodies, etc. The aggregated project level monitoring information and data (e.g. data on the achievement of the Programme level output and result indicators, etc.) would be further used for the Programme level monitoring and evaluations. JS would be responsible for drawing up and submitting to the MA draft annual and final Programme implementation reports, which after the approval by the JMC would be submitted to the EC.

The experience from the 2007-2013 period shows, that it is very important to ensure consistent understanding and interpretation of indicators between the project promoters and the Programme management institutions. To ensure such common understanding it is important that detailed methodology on calculation and reporting of indicators is prepared at the initial stages of Programme implementation<sup>22</sup>.

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<sup>22</sup> In 2007-2013 programming period such methodology was prepared in 2010.

### **4.3. Reduction of Administrative Burden on Beneficiaries**

The ex-ante evaluation question addressed in this Chapter (Article 55 of CPR):  
(n) measures planned to reduce the administrative burden on beneficiaries.

Reduction of the administrative burden on beneficiaries and simplification of administrative provisions could be seen as one of the most important targets in relation to defining the arrangements for the Programme implementation and setting the Programme management and control system. Simplification of the administrative provisions could be valuable in several aspects. First, it would have a positive impact on performance of the Programme by ensuring an efficient distribution of the administrative efforts both at beneficiaries and Programme management institutions level, cutting the time and costs for reaching the objectives and allowing focusing on the most important results, which is of particular importance taking into account the reductions in the overall budget of the Programme. Also, by putting in place simpler rules, which are more easily understood by the stakeholders, would reinforce legal certainty and would help to reduce error level.

The Programme draft provides rather vague description of the planned measures and actions related to reduction of administrative burden on beneficiaries. The planned actions concentrate on the introduction of flat rate financing for indirect project costs, further simplification of application and reporting documents and ensuring more flexibility in choosing of reporting periods. However, the foreseen simplification actions could be significantly broadened to make a deeper impact on reducing of administrative burden on project beneficiaries. Such simplification actions could include wider use of simplified cost options, electronic exchange of data and more effective e-solutions, more proportional management and control arrangements.

#### ***Wider use of simplified costs options***

The simplified cost options were already introduced for the ETC programmes in 2007-2013, however these options have not been used in the framework of the 2007-2013 LT-PL CBC Programme. It is important to note, that simplified cost options provide possibilities to reduce the burdens associated with financial management, control and audit, both for the beneficiaries and the Programme management authorities. They also allow to improve the performance orientation of the Programme, as the payment of lump sums and unit costs in particular may be conditional on the delivery of agreed outputs or results.

The Programme draft envisages use of flat rates for indirect project costs also leaving a possibility for the applicants to choose which payment method to apply: to use the flat rates within the determined limits or to stick to the reimbursement of actually incurred and paid costs with no determined limits. Such proposal would lead to the establishment of dual practices related to determination of indirect project costs for the same type of projects, which would negatively affect integrity and simplicity of Programme's implementing provisions negatively influence equal treatment of similar projects and would therefore significantly limit or eliminate the benefits in relation to reduction of the administrative burden both at the level of beneficiaries and the Programme management authorities. Therefore it is recommended to apply the flat rates for determination of indirect costs for all projects. The flat rates should be established following one of the options indicated in the Article 68(1) of CPR and may be differentiated taking into account objective characteristics of the projects (e.g. project size, share of direct costs allocated to the procurement of services, etc.).

Simplified cost options should not be limited to flat rate financing of indirect project costs, possibilities to use other simplified costs options for the Programme should be also explored – e.g. the use of standard scales of unit costs for travel and accommodation costs, employment costs, etc., lump sums for organisation of project events, etc.

### ***Electronic exchange of data***

The evaluation of the Lithuanian administrative system for the 2007-2013 structural and Cohesion funds OPs under Investment for growth and jobs goal<sup>23</sup> shows that the decrease of administrative burden on beneficiaries was primarily attributed to a wide use of electronic (automated) forms and electronic data exchange. A wider use of electronic forms and electronic data exchange also constitutes an area of great potential for the reduction of the administrative burden of the 2014-2020 LT-PL CBC Programme.

Electronic project application and reporting forms have been already used for the implementation of the 2007-2013 LT-PL CBC Programme, however use of these forms could be further expanded in 2014-2020. It is important to safeguard better integration of various electronic forms and to ensure that data once entered into the electronic forms and imported into the IT system(s) would be used in all Programme and project management stages – e.g. the data entered in the application forms would be used for the preparation of the grant agreements, the data on the grant agreements would be used for the project reporting and monitoring, the project reporting and monitoring data would be used for the Programme level monitoring purposes, etc.

According to the Article 122 (3) of CPR, Member States shall ensure that no later than 31 December 2015 all exchanges of information between beneficiaries and MA, CA, AA and intermediate bodies can be carried out by means of electronic data exchange systems. The systems shall facilitate interoperability with national and Union frameworks and allow **for the beneficiaries to submit all information referred to in the first subparagraph only once**. Practical realisation of possibility to submit all data by the means of electronic data exchange systems would be very beneficial for the Programme, as the JS is located outside the Programme territory.

An important aspect for the development of the Programme IT systems is a very limited overall budget of the Programme. Therefore the development of the IT systems should be balanced with the size of the Programme, the opportunities to use IT systems and solutions developed at EU level should be explored.

### ***Proportional management and control arrangements***

In the framework of the 2007-2013 LT-PL CBC Programme, small projects were implemented in the form of SPF “umbrella” projects. The evaluation of the SPF projects’ efficiency<sup>24</sup> has revealed that although the contracting period for SPF projects was slightly shorter than in the case of open call operations and strategic projects, the expenditure reimbursement period was actually longer. Also, both in applications and in progress reports the SPF beneficiaries were required to provide very similar (only less detailed) information, to that requested in relation to open call operations and strategic projects, and in some cases they were asked to present even more documents together with progress

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<sup>23</sup> Evaluation was conducted as a part of the 2014–2020 EU Structural Funds operational programmes ex-ante evaluation. Evaluation report and it’s English summary can be found at <http://www.esparama.lt/vertinimo-ataskaitos>

<sup>24</sup> ETC Objective CBC Programme Lithuania-Poland SPF Project Efficiency Evaluation. Final Report.

reports. Such administrative provisions have negatively influenced the implementation of small projects and have led to disproportional administrative burden on SPF beneficiaries.

The Programme draft foresees that in the 2014-2020 period the management of small projects will be entrusted to the JS, supported in its activities by the Regional Contact Points (RCP). Small projects shall be selected during special calls to be launched separately from the open calls for project proposals.

Administration of small projects by the JS would help to ensure overall integrity of the Programme administrative provisions, however special attention should be paid to avoiding problems faced in implementation of the 2007-2013 SPF projects and to securing proportional and simplified small projects management arrangements – use of significantly simplified application and reporting forms, quicker procedures for contracting and reimbursement of project expenditure, wide use of simplified costs, etc.

## 5. MAIN CONCLUSIONS AND RECOMMENDATIONS

As explained in Chapter I of this report, the ex-ante evaluation process has been iterative and interactive process. The ex-ante evaluation resulted in a series of suggestions and recommendations to the developers of the CP, which evolved together with a draft of the Programme; most of the recommendations were accepted and integrated into the Programme document. As these recommendations no longer concern the actual draft of the Programme<sup>25</sup> they are not presented in this Chapter. Consequently, the list of recommendations is rather limited, significant share of the recommendations concern optional improvements of the Programme document or should be addressed during Programme implementation stage.

**Table 18. Main conclusions and recommendations**

Evaluation question	Main conclusions and recommendations
(a) the contribution to the Union strategy for smart, sustainable and inclusive growth, having regard to the selected thematic objectives and priorities, taking into account national and regional needs and potential for development as well as lessons drawn from previous programming periods	<p>The justification of the selection of TOs and IPs provided for in the Programme document and the analysis of the needs and challenges performed during the ex-ante evaluation revealed that all four TOs and five IPs were reasonably selected in the CP.</p> <p>The selected TOs and IPs are also consistent with the lessons learned during implementation of the 2007-2013 LT-PL CBC Programme and would help to ensure continuity and durability of cooperation links and initiatives started in the previous programming periods.</p> <p>For detailed information on this evaluation question please see Chapter 2.1 “Selection of Thematic Objectives and Investment Priorities” and Chapter 2.4 “The Consistency of the Programme with the Europe 2020 Strategy and other strategic documents”.</p>
(b) the internal coherence of the proposed Programme or activity and its relationship with other relevant instruments	<p>Programme combines 4 priority axis and 5 IPs/SOs, consequently a very limited number of the selected IPs results in rather broad SOs. The lessons learned from the implementation of the 2007-2013 LT-PL CBC Programme show that such wide priorities and SOs may be beneficial for the Programme – as the projects would be generated following “bottom-up” approach, limited number of priorities and SOs would reduce fragmentation of the Programme and would allow for implementation of complex and comprehensive CBC projects.</p> <p>The analysis of the reconstructed intervention logic (logical framework) of the Programme shows that generally foreseen results reflect the intended change the interventions intend to</p>

<sup>25</sup> Programme draft of 22 July 2014.

Evaluation question	Main conclusions and recommendations
	<p>bring to the CBC region; outputs and output indicators in general reflect the main foreseen interventions (activities); the foreseen activities are consistent with and would contribute to the achievement of the expected outputs and specific objectives of the IPs.</p> <p>However, a number of weaknesses or other observations related to the intervention logic of the Programme were also identified (e.g. in some IPs outputs and output indicators reflect only part of the foreseen interventions, outputs and output indicators do not cover monitoring of immediate project results, some activities are overlapping with the activities foreseen under the same or different IPs, some activities could be presented in a more coherent and focused way, etc.).</p> <p>The Programme territory would benefit from a number of OPs funded under Investment for growth and jobs goal and other CBC programmes financed by the ERDF and ENI. The contribution of these programmes to the Programme’s region would be considerably higher than the overall budget of the 2014-2020 LT-PL CBC Programme. Therefore, the 2014-2020 LT-PL CBC Programme’s funds should be allocated to projects that would demonstrate strongest CBC effects, would be best targeted at the promotion of cooperation links between the relevant actors of LT and PL regions and would contribute to social and economic development on both sides of the border. Such approach would help to ensure proper coordination and synergies with other programmes active in the Programme region.</p> <p>For detailed information on this evaluation question please see Chapter 2.2 “The Internal Coherence of the Programme” and Chapter 2.3 “Relationships of the Programme with other Instruments”.</p>
<p>(c) the consistency of the allocation of budgetary resources with the objectives of the Programme</p>	<p>The allocation of financial resources between the TOs is justified taking into account such factors as strategic importance of the selected TOs and IPs, main characteristics of the priority axis and lessons learned during the previous programming periods.</p> <p>To ensure sufficient amount of quality project applications in the priority axis 2 “Promoting sustainable and quality employment and supporting labour mobility” there might be a need to use additional, more targeted promotion and communication actions directed at potential project applicants.</p> <p>For detailed information on this evaluation question please see</p>

Evaluation question	Main conclusions and recommendations
	Chapter 2.4 “The Consistency of the Allocation of Budgetary Resources with the Objectives of the Programme”.
(d) the consistency of the selected thematic objectives, the priorities and corresponding objectives of the Programme with the CSF, the Partnership Agreement and the relevant country specific recommendations adopted in accordance with Article 121(2) TFEU and where appropriate at national level, the National Reform Programme	<p>The analysis of consistency of the Programme with the Europe 2020 strategy and other strategic documents has revealed that the selected TOs, IPs and corresponding specific objectives are in line with the CSF (part of the CSF directly related to CBC programmes), Partnership Agreements for Lithuania and Poland, headline targets and flagship initiatives of the Europe 2020 strategy and Council recommendations for Lithuania and Poland adopted in accordance with Article 121(2) TFEU for the period 2014-2015.</p> <p>For detailed information on this evaluation question please see Chapter 2.5 “The Consistency of the Programme with the Europe 2020 Strategy and other strategic documents”.</p>
(e) the relevance and clarity of the proposed Programme indicators	<p>The analysis of the result and output indicators has revealed that although the majority of the proposed indicators are sufficiently relevant and clear, the system of indicators could be further improved to better reflect the planned interventions, expected outputs and results. Also, seeking to ensure clarity and consistent interpretation of the indicators it is recommended to prepare a detailed methodology on calculation and reporting of indicators at the initial stages of Programme implementation.</p> <p>For detailed information on this evaluation question please see Chapter 2.6 “Indicators”.</p>
(f) how the expected outputs will contribute to results	<p>The analysis of the intervention logic of the Programme has revealed that the foreseen interventions (activities) would contribute to the achievement of outputs, which in turn would contribute to the expected results. However, in some IPs outputs and output indicators reflect only part of the foreseen interventions (activities) and the proposed result indicators reflect only part of the expected outputs.</p> <p>For detailed information on this evaluation question please see Chapter 2.2 “The Internal Coherence of the Programme” and Chapter 2.6 “Indicators”.</p>
(g) whether the quantified target values for indicators are realistic, having regard to the support envisaged from the ESI Funds	<p>The quantified target values for the majority of output and result indicators are realistic; however for significant part of indicators more ambitious quantified targets could be set.</p> <p>It is also important to note, that given the wide Programme territory and a relatively small financial volume, the Programme would influence the actual values of result indicators set for TO6 and TO8 only to a very limited extent.</p>

Evaluation question	Main conclusions and recommendations
	<p>For detailed information on this evaluation question please see Chapter 2.6 “Indicators”.</p>
<p>(h) the rationale for the form of support proposed</p>	<p>The Programme will be implemented through non-repayable grants. This form of assistance is justified and could be assessed as the most suitable for the Programme taking into account both the characteristics of the planned interventions and the experience from the 2007-2013 PLT-PL CBC Programme.</p> <p>For detailed information on this evaluation question please see Chapter 2.8 “Rationale for the Form of Support Proposed”</p>
<p>(i) the adequacy of human resources and administrative capacity for management of the Programme</p>	<p>The management structures envisaged for the administration of the Programme would be based on those used for the administration of the 2007-2013 LT-PL CBC Programme. The functions of the MA, AA, NA and JS would be carried out by the same institutions as in 2007-2013. Such administrative setup would allow securing continuity of the administrative system, preserving experience related to the administration of the CBC programmes and ensuring that the Programme is managed by the institutions, which have adequate human resources and administrative capacity.</p> <p>As the TA funding decreased by more than 28% compared to the 2007-2013 period, one of the biggest challenges in ensuring the adequacy of human resources and administrative capacity for the management of the Programme would be related to sufficiency of funding. To ensure sufficiency of funding, special attention should be paid to simplification and optimisation of Programme management arrangements (wide use of simplified costs options, simplified procedures for small projects, etc.), which would allow to reduce both the administrative burden to the beneficiaries and the administrative costs to JS.</p> <p>For detailed information on this evaluation question please see Chapter 4.1 “Adequacy of Human Resources and Administrative Capacity for Management of the Programme”.</p>
<p>(j) the suitability of the procedures for monitoring the Programme and for collecting the data necessary to carry out evaluations</p>	<p>The Programme’s monitoring arrangements in general are consistent with and would be based on those used for the administration of the 2007-2013 LT-PL CBC Programme, which would help to ensure continuity and quality of the monitoring framework.</p> <p>To ensure quality of the Programme monitoring data and suitability of this data for evaluations, it is important that a detailed methodology on calculation and reporting of indicators</p>

Evaluation question	Main conclusions and recommendations
	<p>is prepared at the initial stages of the Programme implementation.</p> <p>For detailed information on this evaluation question please see Chapter 4.2 “Suitability of the Procedures for Monitoring the Programme”.</p>
(k) the suitability of the milestones selected for the performance framework	<p>The milestones selected for the performance framework of the Programme combine all output indicators and financial indicators, thus the selected milestones reflect the intended progress towards the targets set both at Programme and priority level.</p> <p>The values of the intermediate milestones established for 2018 could be more ambitious and could be differentiated taking into account the types of interventions.</p> <p>For detailed information on this evaluation question please see Chapter 2.7 “Performance Framework”.</p>
(l) the adequacy of planned measures to promote equal opportunities between men and women and to prevent any discrimination, in particular as regards accessibility for persons with disabilities	<p>The principle of equal opportunities would be horizontally addressed in all TOs of the Programme. The activities foreseen under TO8 and TO9 would have a positive impact on the implementation of the principle of equal opportunities and combating discrimination in CP territory.</p> <p>To secure and to maximise Programme’s inputs into the promotion of equal opportunities and non-discrimination, it is very important to ensure that these principles are integrated into the Programme implementing arrangements.</p> <p>For detailed information on this evaluation question please see Chapter 3.1 “Equal Opportunities”.</p>
(m) the adequacy of planned measures to promote sustainable development	<p>The Programme does not include large infrastructure or industrial projects and does not set the framework for future development consent for projects listed in Annexes I and II of EIA Directive, therefore significant negative impacts on environment are unlikely.</p> <p>Taking into account the selected TOs, IPs and corresponding specific objectives, the Programme interventions would have a positive impact on the promotion of sustainable development in a number of areas, however small financial volume of the Programme would limit the Programme’s impact on the overall sustainable development of the Programme region.</p> <p>To secure and to maximise the Programme’s inputs into the</p>

Evaluation question	Main conclusions and recommendations
	<p>promotion of sustainable development, it is very important to ensure that sustainable development principles are integrated into the Programme implementing arrangements.</p> <p>For detailed information on this evaluation question please see Chapter 3.2 “Sustainable Development”.</p>
<p>(n) measures planned to reduce the administrative burden on beneficiaries</p>	<p>The Programme draft provides rather vague description of the planned measures and actions related to reduction of administrative burden on beneficiaries.</p> <p>Simplifications measures foreseen in the Programme draft might be significantly broadened to make a deeper impact on reducing administrative burden on project beneficiaries. Such simplification measures might include wider use of simplified cost options, electronic exchange of data and more effective e-solutions, more proportional management and control arrangements for small projects.</p> <p>For detailed information on this evaluation question please see Chapter 4.3 “Reduction of Administrative Burden on Beneficiaries”.</p>