

THEMATIC EVALUATION ON IPA SUPPORT TO FIGHT AGAINST CORRUPTION) (Ref. Contract No2014/348486/2)
FOLLOW-UP ON THE LESSONS LEARNED AND RECOMMENDATIONS, RELEVANT TO FUTURE IPA INSTRUMENT

Recommendations, Final report	Responses, DGNEAR: (i) accepted or not; ii) actions to be undertaken	Follow up
A. Recommendations of key elements for IPA anti-corruption support		
Relevance and Coherence		
1. The Commission should make clear that careful attention should be paid to how and when/if to use conditionalities (in terms of political support, staffing and other resources) because including them indiscriminately in programming documents can be risky.	The recommendation is addressed to the Commission (EC). The recommendation is accepted by DG NEAR. Clear differentiation will be made between assumptions, accompanying measures and conditionalities in the programming document Country strategy papers/Multi-country strategy papers (CSP/MSCP) and Action programmes.	The recommendation will be followed through the implementation of the Country/Multi-Country Strategy Papers (CSP and MSCP) and Action programmes (annual or multi-annual). Country units DG NEAR Directorate D in consultation with A4 will implement the recommendation in the context of the programming exercise. Deadline for implementation: Annually for IPA II action programmes
2. The Commission should encourage the building-in of the maximum amount of flexibility allowed in programming documents, according to procedures, in order to avoid making an implementation “straightjacket” for project actions.	The recommendation is addressed to the Commission (EC). The recommendation is accepted by DG NEAR. Flexibility in the programming document Country strategy papers/Multi-country strategy papers (CSP/MSCP) and Action programmes will be ensured through defining objectives, expected results and indicators, Action Programmes shall specify for each action the objectives pursued and the expected results as well as any associated support measures and performance monitoring arrangements, but creating as much flexibility as possible within the existing rules for further fine-tuning of the main activities, methods of implementation, budget and indicative timetable.	The recommendation will be followed up through the implementation of the Country/Multi-Country Strategy Papers (CSP and MSCP) and Action programmes (annual or multi-annual). Country units DG NEAR Directorate D in consultation with A4 will implement the recommendation in the context of the programming exercise. Deadline for implementation: Annually for IPA II action

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		programmes
3. The Commission should continue to take responsibility for organising regular consultation and coordination meetings among donors, especially before and during the programming phase, to achieve coherence and to avoid duplications.	The recommendation is addressed to the Commission (EC). The recommendation is generally accepted by DG NEAR. The legal framework under IPA II envisages that NIPAC will be responsible to ensure co-ordination within the beneficiary country's administration and with other donors and a close link between the use of IPA assistance and the general accession process should be created. Also, the IPA II legal framework foresees that Sectoral Monitoring Committees will be reinforced to ensure effectiveness, coherence and coordination of the implementation of IPA assistance at sector level under indirect management with beneficiary countries. The legal framework envisages also that sectoral monitoring committees may be set up on an ad hoc basis under other implementation methods, when appropriate. The Commission will play a supporting role vis à vis the government, and when necessary a more pro-active role until the beneficiary authorities are able to ensure this role.	The recommendation will be implemented in the context of the preparation of annual action programmes and continuously during the implementation of on-going programmes. The EU Delegations will implement the recommendation in close collaboration with the beneficiary authorities, and report as part of the EAMR exercise. Deadline for implementation: Annually for IPA II action programmes, and continuously for on-going programmes.
4. The Commission should give more attention to the prevention of corruption in the (semi-) private sector, e.g. ethics, code of conduct, internal controls. It should be more proactive in achieving the participation of relevant private sector representatives among beneficiary partners in anti-corruption actions.	The recommendation is addressed to the Commission (EC) and is generally accepted by DG NEAR. The commission recognises that more attention needs to be paid to the role of local private sector and CSOs, including such organisations like Chambers of Commerce etc, and to their engagement in the fight against corruption. Mainstreaming attention to anti-corruption across several policy priorities is necessary. The EC already participates in several dialogue processes and fora with the business community, both on local and wider level. Raising the issue of fight against corruption more proactively in these fora will be sought where appropriate. Policy dialogue in the context of Sector Budget Support can also provide an opportunity to address these issues, not only with the government but also with the private sector and CSOs.	The recommendation will be followed up in the context of annual programming, and in the context of policy dialogue on different fora and different levels by the Delegations and HQ services on a continuous basis where appropriate.
Effectiveness		
5. The Commission should focus attention on assisting anti-	This recommendation is addressed to the Commission and is	No specific follow up is envisaged.

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corruption bodies of national governments with the practical implementation of the anti-corruption strategies and policies they have developed. It is important that these implementation actions are their own and have coherent objectives, are appropriate to the context of the respective countries, and that they accord with international anti-corruption standards and best practices	generally accepted. The importance to align EC actions to national strategies is emphasised in the context of sector approach and SBS which are both promoted under IPA II.	However, the recommendation will be followed up in the context of annual programming where relevant.
Efficiency		
6. The Commission should always take into consideration the quantity of staff available to participate in project implementation and the probability of their turnover when planning projects.	The recommendation is addressed to the Commission (EC) and is generally accepted by DG NEAR. The Commission already aims at mitigating the risks related to staff turn-over through identifying appropriate measures, and where appropriate, by introducing conditionalities. Attention is also paid to this in the context of PAR sector, SBS and related policy dialogue.	No specific follow up is envisaged.
7. The Commission should ensure that resident project leaders and international experts are fully familiar with the subject matter and the local situation, and are ready and able to discuss matters of substance with beneficiary institutions.	The recommendation is addressed to the Commission (EC) and is accepted by DG NEAR. The Commission already aims at ensuring that only good quality technical assistance is recruited. However, in specific situations a balance needs to be found between what is available/affordable within the given time frame and budget.	No specific follow up is envisaged.
Impact and sustainability		
8. In order to beneficially influence the political will of beneficiaries, the Commission should take every opportunity to link policy dialogue and financial assistance.	The recommendation is addressed to the Commission (EC) and is accepted by DG NEAR. The link between political priorities and priorities for assistance has been reinforced in the IPA II Regulation. It clearly focuses on the "fundamentals first" as set out in the Commission's enlargement strategy. The up take sector approach and/or Sector Budget Support enhance the importance of policy dialogue and the link between policy dialogue and financial assistance.	The recommendation will be followed in the context of annual programming, and in the context of policy dialogue on different fora and different levels by the Delegations and HQ services on a continuous basis where appropriate, and especially in the context of sector approach and SBS. Deadline for implementation: Annually for IPA II action programmes, and continuously for

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		on-going programmes
9. The Commission should allow the programming of longer-term projects (circa three years) but with annually designed and approved activity plans. In the case of Twinning projects the benefits of counterpart public bodies working together might be consolidated by follow-up of the assistance being provided by the same Member State counterpart, if they have the capacity and experience.	The recommendation is addressed to the Commission (EC) and partially to Member States providing Twinning. The recommendation is accepted by DG NEAR. The Commission recognises that in many areas in order to introduce change and have impact a long term approach is needed. Changes introduced under IPA II facilitate the programming and implementation of programmes with a longer term perspective, in some cases up to seven years. Concerning Twinning, there are good experiences from some IPA countries where follow up missions by twinning partners have been introduced. Where feasible, this approach will be encouraged.	The recommendation will be followed through the implementation of the Country/Multi-Country Strategy Papers (CSP and MSCP) and Action programmes (annual or multi-annual). Country units DG NEAR Directorate D and unit C3 responsible for twinning, and in consultation with A4, will implement the recommendation in the context of the programming exercise. Deadline for implementation: Annually for IPA II action programmes
10. The Commission should ensure that stakeholders undertake ex-post monitoring of the utilisation of project deliverables. In the case of Twinning projects, ex-post visits of Resident Twinning Advisors to review progress, might be formally adopted as standard practice.	The recommendation is addressed to the Commission (EC) and it is generally accepted by DG NEAR. As part of the new external ROM contract the possibility to undertake end of project results reporting by the ROM contractor has been introduced to provide support to Delegations in identifying and checking the most relevant results to report on. As for twinning, Twinning Review Missions (TRM) are foreseen in the Twinning Manual. The RTA is one of the experts mobilised in order to follow-up on the progress made.	No additional actions are envisaged to be undertaken However, the recommendation will be followed up in the context of carrying out "end of project results reporting" missions managed by A3 in consultation with Delegations, and by C3 for twinning projects.
B. Recommendations of technical issues for IPA II programming		
1. The European Commission should continue to assist beneficiaries strengthen their capacities to develop sound Sector Planning and Action Documents in compliance with IPA II Regulations.	The recommendation is addressed to the Commission (EC) and it is generally accepted by DG NEAR. Training and technical assistance, where required, is being provided to beneficiaries to strengthen their capacities to improve sector	Unit A4 will continue to organise trainings for beneficiaries on sector planning and related issues.

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2. The European Commission should continue to take steps to ensure EU Delegations, NIPACs and leading institutions include indicators that are SMART and context specific at all levels of IPA support. Indicators (and logframes) should be carefully reviewed on a regular basis and they should be open to change.	planning and to better apply IPA II regulations. The recommendation is addressed to the Commission (EC) and it is partially accepted by DG NEAR. Under IPA II indicators are introduced on all levels (strategic, programme and project/action). The Commission has reservations concerning the readjustment of indicators beyond the inception phase. When problems are experienced during the implementation of a project, mitigating measures should be taken to improve the chances of the project to achieve the expected results and objectives.	The recommendation will be implemented in the context of the preparation of annual action programmes. Delegations and country units in DG NEAR Directorate D in consultation with A4 will implement the recommendation in the context of the annual programming exercise. Training in the use of indicators is foreseen to be organised for beneficiaries both in country and in EC HQ. A3 is responsible for organising the training. Deadline for implementation: Annually for IPA II action programmes Training workshops will be organised during 2016.
3. The European Commission should continue to assist beneficiaries of anti-corruption actions to select implementation approaches and related activities, which are most likely to produce the optimum impact in the fight against corruption for the beneficiary country.	The recommendation is addressed to the Commission (EC) and it is accepted by DG NEAR.	No specific actions are envisaged to be undertaken. However, recommendation will be followed up in the context of the preparation of annual action programmes by Delegations and country units in DG NEAR Directorate D .
4. Where anti-corruption actions are planned to be programmed under Sector Budget Support by a beneficiary, in addition to providing guidance and instructions for its implementation, the European Commission should encourage similar beneficiaries	The recommendation is addressed to the Commission (EC) and it is accepted by DG NEAR. Actions to ensure exchange of best practices between delegations in relation to SBS are being facilitated both by A4 and A3.	No specific actions are envisaged to be undertaken.

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that are already implementing anti-corruption actions under Sector Budget Support in other IPA countries, to record and share their experiences and lessons learned with that beneficiary		
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