# ANNEX 2

of the Commission Implementing Decision on the ENPI East Regional Action Programme 2013 Part II

Action Fiche for Eastern Partnership Integrated Border Management project -Strengthening surveillance and bilateral coordination capacities at the Belarusian-Ukrainian state border with a particular focus on central and western areas of that frontier

## 1. **IDENTIFICATION**

Title/Number	Eastern Partnership Integrated Border Management project - Strengthening surveillance and bilateral coordination capacities at the Belarusian-Ukrainian state border with a particular focus on central and western areas of that frontier CRIS number: 2013/024-829			
Total cost	Total estimated cost: EUR 5,350,000  Total amount of EU budget contribution: EUR 5,100,000  This action is co-financed through joint co-financing by International Organization for Migration (IOM) for an amount of EUR 250,000			
Aid method / Method of implementation	Project Approach Joint management with the International Organization for Migration (IOM)			
DAC-code	15210	Sector	Security system management and reform	

## 2. RATIONALE AND CONTEXT

# 2.1. Summary of the action and its objectives

This action fiche is based on the results of the study "On the Priorities for a Second Phase of the EU-funded Assistance Project "SURCAP" (Strengthening Surveillance Capacity on the 'Green' and 'Blue' Border between the Republic of Belarus and Ukraine)". The study's core conclusion is that EU assistance for the enhancement of border surveillance at both 'green' (land) and 'blue' (rivers and lakes) border sections between Belarus and Ukraine is in demand. It also argues that consideration should be given to the possibility of launching a follow-up to the SURCAP<sup>2</sup> project (Strengthening Surveillance Capacities), conditional upon a clear commitment of the border guard services of both beneficiary countries to develop new forms of cooperation at the common border. In particular, this may include the establishment of Common Contact Points (CCPs) and coordinated patrolling, which, if supported by the procurement of equipment for

<sup>&</sup>lt;sup>1</sup> Specific Contract 2012/305-967

<sup>&</sup>lt;sup>2</sup> The SURCAP (Strengthening Surveillance Capacities) project is a current intervention of the IBM Flagship Initiative funded under the ENPI East Regional Action Programme 2011 budget.

strengthening border surveillance, would at the same time enhance the work of CCPs leading to coordinated joint patrols and, as a result of future developments, to joint border checks.

The project purpose is to help increase efficiency and effectiveness of the work of the Belarusian and Ukrainian border services in central and western areas of the countries' joint border. It will consist of two components. The training component will focus on the enhancement of inter-service and international cooperation of the border services of the two beneficiary countries (Common Contact Points, coordinated patrolling, potentially joint patrolling), accompanied by seminars, study visits and workshops on specific issues such as patrolling of territories in swamp areas. The procurement component is aimed at strengthening communication, transport and surveillance capacities.

### 2.2. Context

## 2.2.1. Regional context

## 2.2.1.1. Economic and social situation and poverty analysis

UNDP's Human Development Index (HDI) provides a composite measure of three basic dimensions of human development: health, education and income. In 2013, Belarus' HDI is 0.793, which gives the country a rank of 50 out of 187 countries with comparable data. Ukraine's HDI is 0.740 (ranked 78<sup>th</sup>). The HDI of Europe and Central Asia as a region stands at 0.771 today, placing Belarus slightly above and Ukraine slightly below the regional average.

According to World Bank figures for 2011, Belarus' GNI per capita was USD 5,840 and its GDP USD 55.13 billion. The figures for Ukraine in the same year were USD 3,130 and USD 165.2 billion, respectively.

## 2.2.1.2. Regional development policy

Ukraine is a partner country of the European Union within the European Neighbourhood Policy (ENP). The EU-Ukraine ENP Action Plan, signed in 2005, lays out the strategic objectives based on commitments to shared values and effective implementation of political, economic and institutional reforms. Moreover, an Association Agreement with Ukraine may replace the Partnership and Co-operation Agreements (PCA) once all pre-conditions are met. This Association Agreement will aim at deepening Ukraine's political association and economic integration with the EU.

EU-Belarus relations have been curtailed for many years in the light of international concerns regarding Belarus' record on human rights. The ENP covers also Belarus, but no Action Plan was envisaged at that time.

# 2.2.2. Sector context: policies and challenges

The Belarus-Ukraine border stretches for 1,084 km and mainly runs across a flat land terrain. However, around 250 km run along different rivers like Pripyat, Dnepr and Sozh. There are six railway, 13 road and three river border crossing points as well as 16 border crossing points for local traffic. In Soviet Union times, the border between Belarus and Ukraine had a status of an administrative boundary and had no border security elements. There was no border control and, consequently, no infrastructure was required, no personnel had to be trained, equipment purchased or delimitation or demarcation conducted. Frontier areas have a relatively high

density of local population. The border terrain is very difficult, and the areas are mostly covered with dense forests, swamps and small lakes. Apart from the 'green' border (land border sections between border crossing points (BCPs)) there are 'blue' border sections (rivers and lakes) which constitute over one fifth of the whole run of the Belarusian-Ukrainian border. Depending on the season, the vertical change in water levels may reach up to 7 m. As a result, some rivers sometimes become up to 17 km wider than during the dry season. The border in swampy areas constitutes over 17 percent of the 670 km-long border section secured by the Gomel Border Group in (Southwestern) Belarus. It should also be noted that approximately 115 km of the Belarusian-Ukrainian border is contaminated as a result of the disaster at the Chernobyl Nuclear Power Plant.

Belarus and Ukraine are key countries for transit of irregular migrants, originating in Asia (Afghans) and the Caucasus (Georgians, Chechens) as well as to a limited extent Africa, and moving mostly from the territory of Russia to the EU. Traffickers and smugglers take advantage of abolished border control at the Belarus-Russia border before they try to proceed further from Belarus to Ukraine and the EU, frequently circumventing border crossing points in their immediate vicinity. Belarus and Ukraine also remain the main transit countries for both CIS and non-CIS irregular migrants aiming to enter the EU across its Eastern borders. At the Belarus-Ukraine border, the number of cases of illegal border crossings at BCPs is the highest in comparison with other borders, EU-facing or non-EU, in the region (Ukraine, Moldova, Russia and Belarus). This border is also among the top five most problematic borders, EUfacing or non-EU, in the region in terms of the number of cases of illegal border crossings between BCPs. However, protection levels at that border are comparatively low, in particular in areas adjacent to Chernobyl where border guards can only remain for a limited period of time due to radiation health risks. Nevertheless, smugglers and organised gangs disregard these concerns and are rather free to carry out cross-border crime including trafficking in human beings and goods (mainly tobacco, alcohol, car spare parts, textiles and drugs).

In Belarus, the border guard system is founded on a ten-year strategy covering the years 2008-2017, which, among others, foresees the transformation of the border guard into a service, which is based entirely on professionals in the coming four years (15 per cent of the staff are still conscripts). While the first five years of the strategy were dedicated to the establishment of the legal foundations for the reform, the years 2013-2017 will be focussed on the implementation of activities (such as strengthening and demarcation of the Belarus-Ukraine border, abolishment of the use of conscripts, etc.). On 9 August 2013, the Belarusian President endorsed by decree the new state programme "On the Development and Modernisation of Infrastructure on the State Border of the Republic of Belarus and Border Zones 2014-2022", which is supposed to complement the Strategy. With the support of the EU-funded IBM Flagship Initiative Training project, an Integrated Border Management (IBM) strategy has been drafted and presented to the leadership of the State Border Committee of the Republic Belarus. It is not known, though, when it will be adopted.

In Ukraine, the Cabinet of Ministers approved the Integrated Border Management (IBM) Concept on 27 October 2010 and its Action Plan on the 5 January 2011. By listing its five main dimensions, the IBM Concept contains a clear reference to the EU IBM Strategy approved by the Council Conclusions of 4-6 December 2006. According to the Concept, the State Border Guard Service of Ukraine has the overall responsibility for the implementation of the tasks arising from it.

## 2.3. Lessons learnt

So far, there have been five Result-Oriented Monitoring (ROM) exercises on EU-funded national Belarusian projects<sup>3</sup> and one sector evaluation, the marks and comments of which were quite positive.

In Ukraine, a multi-project ROM report, published in 2008, gave an affirmative assessment of the work of the border guard service, in particular regarding the implementation of the strategy on becoming fully compatible with the Schengen system. Further, a sector readiness assessment was carried out in 2010, analysing the Ukrainian border management sector in the context of the Sector Budget Support. EUBAM, now in its 8<sup>th</sup> year, is still monitoring the border between Ukraine and Moldova, regularly providing reports with useful conclusions regarding the overall capacity of the State Border Guard Service of Ukraine.

Lessons learned from previous assistance provided in both countries include:

- Assistance in a sensitive area such as border management needs to be developed through a constant and often time-consuming dialogue with beneficiary governments;
- A regional approach provides coherence and encourages harmonisation of global procedures among beneficiary countries;
- Assistance projects have to be tailor-made and needs have to focus on each country's specific requirements;
- The provision of equipment has to be linked to training sessions dedicated to the equipment's use and maintenance;
- Assistance in a particular area needs a mid- to long-term perspective. "One-shot" interventions, implemented over a period of two-three years often lack sustainability;
- Assistance provided needs to be coordinated with other assistance projects: this is being guaranteed by the fact that the "IBM FIT" (Flagship Initiative Training) project has been implemented by the International Centre for Migration Policy Development (ICMPD), which will be also involved in this intervention.

Reference is also made to the European Court of Auditors (CoA) Special Report No. 9 of 2008 "The Effectiveness of EU Support in the Area of Freedom, Security and Justice for Belarus, Moldova and Ukraine" which confirms "satisfactory achievements" in the area of border management and praised in particular the State Border Committee of Belarus for its "great commitment". In the report's conclusions and recommendations, the Court identified two principle issues highly relevant for this particular intervention:

- Lack of speed: "Progress was slower than expected by the Commission, the great majority of projects [was] extended by several months, some even by over a year."
- Need to focus more on management- and EU practice questions: "The long term goal of a modern system of border management approximating European good practice is still some way off."

In addition, the Court rightly pointed to the need to ensure sustainability through credible commitments from the partner services regarding the use of procured equipment. Before the launch of any supply contract notices, a formal commitment regarding the running costs (fuel, maintenance etc.) will be sought.

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<sup>&</sup>lt;sup>3</sup> BOMBEL 1 (three times), BOMBEL 2 (once) and SURCAP (once) were monitored.

# 2.4. Complementary actions

Assistance by the European Union or other international donors aimed at the border between Belarus and Ukraine, in contrast to the borders of the same countries with the Member States, has been somewhat scarce. For the time being, there has been only one intervention which has been dedicated entirely to that border: Under the EaP IBM Flagship Initiative budget for 2011, the EU decided to allocate EUR 2.6 million for the strengthening of the Belarus-Ukraine border. The project was split into two components: one on training (EUR 0.7 million) and one on equipment (EUR 1.9 million). The training project <u>SURCAP</u> (Strengthening Surveillance Capacity) started in March 2012 and will last until March 2014. The equipment was tendered in autumn last year and is expected to be delivered to the beneficiaries in summer 2013. Meanwhile, it has turned out that its budget was too small to cover the whole, more than 1,000-km-long frontier. Therefore, the focus of activities has been on the Eastern part of that border.

The Eastern Partnership <u>IBM Flagship Initiative Training</u> (IBM FIT) project (EUR 2,000,000) is the first IBM Flagship project. Its activities started in January 2011 and finished in June 2013. It was implemented by ICMPD. Activities in its six beneficiary countries focused on inter-institutional dialogue, awareness-raising on IBM and the fight against corruption, as well as support to the establishment of modern training system. The project proposed in this Action Fiche will be closely coordinated with the activities of IBM "FIT 2", which is currently under preparation.

The EU-funded <u>EUBAM</u> programme (European Border Assistance Mission) to Moldova and Ukraine has been supporting improvement in border management standards in Moldova and Ukraine by providing technical input *inter alia* for the settlement process of the Transnistrian conflict since late 2005. This project in the area of freedom, security and justice was commended in the above mentioned Court of Auditors report as contributing greatly to building capacity in the Moldovan and Ukrainian border guard and custom services. EUBAM has made recommendations on legislative and structural reform of the customs and border guard services. It has identified further needs for capacity-building and special equipment.

Reference is also made to several EU-funded projects funded under the <u>Cross Border Cooperation Programmes</u> "Poland-Belarus-Ukraine" and "Latvia-Lithuania-Belarus", in the framework of which five major interventions (mainly reconstruction of border crossing points) worth approximately EUR 20,150,000 in total are being financed in Belarus and several dozens of TAIEX events requested by the two main beneficiaries. In Ukraine, three Cross Border Cooperation Programmes are currently operational. For the first one – the Poland-Ukraine-Belarus programme – many large-scale projects concern border management. These projects are estimated to amount to approximately EUR 16,718,000 in total. The implementation of other large-scale projects in the framework of the Romania-Moldova-Ukraine programme and the Hungary-Slovakia-Romania-Ukraine programmes are currently in progress.

Under the ENPI 2010 Annual Action Programme for Ukraine, the European Commission signed a EUR 66 million Sector Policy Support Programme in the field of border management, in support to the improvement of the sector's management in Ukraine, in particular of the Integrated Border Management (IBM) strategy. As complementary measures, a Twinning project for the State Border Guards Service and one for the Customs are under preparation. Several supply contracts for both the customs and the border guards are being implemented at the moment.

<u>Frontex</u> has bilateral working arrangements on the establishment of operational cooperation with the relevant authorities of Belarus and Ukraine. According to these arrangements, cooperation focuses geographically on external EU borders and thematically on the exchange of information and experience, risk analysis, joint operations, training, joint activities and secondment of border guards to EU Member States units responsible for border control. Frontex does not provide equipment to the two beneficiary countries.

It is expected that each of the two <u>beneficiary countries</u> will contribute EUR 330,000 (indicative figure) to the strengthening of the Belarus-Ukraine border outside the Contribution Agreement with IOM.

## 2.5. Donor coordination

The specific political circumstances in Belarus have resulted in a quasi monopoly position of the European Commission towards the State Border Committee. Assistance activities by other donors in this particular area are very limited. However, it should be noted that also Russia provides aid but its extent can hardly be assessed.

As regards border management, the U.S. is the only major active donor next to the EU. Close cooperation and coordination of activities are taking place on a permanent basis to ensure synergy effects. Coordination with beneficiaries and donors is also achieved through the EUBAM Advisory Board and bi-annual EUBAM Coordination meetings on Border Management training.

## 3. DETAILED DESCRIPTION

## 3.1. Objectives

# **Overall Objectives**

- To contribute to the enhancement of security levels on the Belarusian-Ukrainian border;
- To help improve international cooperation between the border services of the two beneficiary countries;
- To assist beneficiary countries in applying the stipulations of bilateral agreements on local border traffic which aim at an increased number of legal transits through border crossing points;
- To help beneficiary countries increase legal trade and, as a consequence, tax revenue.

# Project Purpose

To help increase efficiency and effectiveness of the work of the Belarusian and Ukrainian services working on the border in central and western areas of the countries' joint frontier.

# 3.2. Expected results and main activities

This project will be built upon the experience gathered during the implementation of the SURCAP project, which is focussed on the Eastern areas of the Belarus-Ukraine border, and is aimed at remedying the problems identified in section 2.2.2 of this Action Fiche. It will consist

of two components: Component 1 - provision of expertise, training sessions, study visits and exchange of experience and best practice; Component 2 - procurement of equipment.

The training component will focus, among others, on the enhancement of inter-service and international cooperation of the border services of the two beneficiary countries (Common Contact Points, coordinated patrolling, potentially joint patrolling), accompanied by seminars, study visits and workshops on specific issues such as patrolling of territories in swamp areas.

The procurement component is aimed at bolstering the training component by strengthening mainly communication, transport and surveillance capacities as well as the establishment of Common Contact Points. More concretely, the procurement of equipment aimed at enhancing transport, communication and surveillance capacities will contribute to the Result on increased security levels at the green and blue border, the purchase of office desks and computers for Common Contact Points and video surveillance devices to the Result on enhanced international and intra-service cooperation and the procurement of border zone signs to the Result on increased awareness of the population living in border zones on the location of the state frontier.

#### Results

- Result 1: International and inter-service cooperation will be enhanced by applying IBM principles (Common Contact Points, introduction to coordinated and joint patrolling working methodologies, one-stop-window approach);
- Result 2: Security at the "green" and "blue border will be strengthened;
- Result 3: Awareness of the population living in border areas on the location of the state frontier will be increased.

## Activities:

Activities of Component 1 (training, policy advice, exchange of experience, study visits, etc.) will be as follows (list is indicative):

- Facilitation of the establishment of Common Contact Points (CCPs) aimed at, *inter alia*, enhancing cooperation at international level between the border services of the two countries, including the development of a manual on CCPs (contributing to Result 1);
- Facilitation of the implementation of the Protocol on Coordinated Patrolling recently signed by the countries through the organisation of seminars and study visits to the Moldovan-Ukrainian border and/or the Balkans (contributing to Result 1);
- Policy advice on joint patrolling at central/HQ level as an option for increasing security and reducing costs at the Ukrainian-Belarusian frontier to be introduced in the countries' border guard services in a long-term perspective (including, possibly, a study visit to the Balkans) (contributing to Result 1);
- Study visit(s) to the Lithuanian-Russian border (similarity of terrain) (contributing to Result 2);
- Study on the development of enhanced communication capacities in border regions with particularly difficult terrain (contributing to Result 2);
- Exchange of experience on the involvement of the population living in border areas in the protection of the state border (contributing to Results 2 and 3);
- Organisation of an equipment tender (contributing to Results 1, 2, 3);

- Key indicators baseline assessment to measure impact of the project at the end of its implementation (horizontal task);
- Close coordination with upcoming "FIT 2" project to ensure full complementarity (horizontal task);
- Visibility activities (horizontal task).

Equipment to be procured by IOM in the framework of Component 2 might encompass items such as (list is indicative):

- Boats to patrol the Pripyat and Dnepr rivers including trailers (contributing to Result 2);
- Diving equipment (contributing to Result 2);
- Vehicles capable of crossing swamps (contributing to Result 2);
- 4WD vehicles (contributing to Results 1-3);
- All terrain motor bicycles (contributing to Results 1-3);
- Thermal imaging cameras (contributing to Result 2);
- Radio communication (contributing to Result 2);
- Binoculars (contributing to Result 2);
- Cordless spot lights with rechargeable batteries (contributing to Result 2);
- Equipment needed for the establishment of Common Contact Points in BCPs (office desks, computers) (contributing to Result 1);
- Video surveillance in BCP booths and BCP lanes aimed at fighting corruption (contributing to Results 1);
- Border zone signs (contributing to Result 3).

This list of equipment is based on the findings of the study "On the Priorities for a Second Phase of the EU-funded Assistance Project "SURCAP" (Strengthening Surveillance Capacity on the 'Green' and 'Blue' Border between the Republic of Belarus and Ukraine)". Both beneficiary institutions confirmed to EU Delegation staff the list proposed by the study's author in meetings organised during the formulation phase.

The expected EUR 5.35 million budget of the Contribution Agreement (including IOM's contribution) will be split tentatively as follows: Component 1 – EUR 0.55 million, and component 2 – EUR 4.8.

# 3.3. Risks and assumptions

(i) Corruption among border management officials may undermine the expected results of this action (medium risk).

Mitigation measure: The Sector Budget Support on Border Management in Ukraine will be supported by a series of accompanying measures, including monitoring activities related, *inter alia*, to fight against corruption. Particularly successful activities of that programme could be included in this project.

(ii) The counterparts may not fully endorse or take considerable time when endorsing the project, assigning institutions and experts for participation in the project's activities (low risk). *Mitigation measure*: Experience during the implementation of the SURCAP project shows that the *timely* involvement of beneficiaries in project activities is the best way to address this risk. Moreover, this risk appears to be quite low since beneficiaries have been consulted from the beginning and have frequently expressed support.

(iii) Trained personnel may leave the institution or be assigned to other responsibilities (low risk).

Mitigation measure: The risk of staff fluctuations seems to be clearly lower in the beneficiary countries compared to other parts of the world. However, the best way to address this matter is to involve significant numbers of beneficiaries' representatives in project activities (trainers in particular).

(iv) A deteriorating political situation in Belarus could make the implementation of a project with Belarusian security services difficult, undermining mutual trust between the Belarusian authorities and EU project experts (high risk).

*Mitigation measure*: In such an event, a decision could be taken to refocus the activities fully to the Ukrainian side of the border.

(v) A deteriorating economic situation in Belarus could make the implementation of a project with Belarusian authorities difficult (medium risk).

*Mitigation measure*: In such an event, a decision could be taken to refocus the activities fully to the Ukrainian side of the border.

Sustainability appears to be guaranteed by the fact that beneficiary institutions developed the basic idea of this intervention. The governments' representatives reiterated their interest in the project during several meetings with the responsible EU Delegation. A high degree of ownership is therefore very likely.

# 3.4. Cross-cutting issues

Good governance: The project is expected to be based on good governance principles (particularly ownership and anti-corruption). It will promote the dialogue between different levels of the state administration. Also, it will help strengthen the partner countries' capacities to better deal with the management of their international borders as well as bilateral and multilateral co-operation issues through the organisation of regional training sessions and actions (i.e. the main IBM principles).

Human rights and Gender: The project will contribute to the promotion of women participation in the management of the border. It is worth mentioning that beneficiary institutions of the SURCAP-project have been made aware of the need by both IOM/ICMPD and the responsible EU Delegation to further increase women participation in seminars, study visits, etc. Both services have replied positively.

The expected *long-term impact* is to contribute to the strengthening of good neighbourly relations as well as the facilitation of trade and migration flows.

# 3.5. Stakeholders

The beneficiaries of this intervention will be the State Border Committee of the Republic of Belarus and the State Border Guard Service of Ukraine. However, it is expected that representatives of the State Customs Committee of the Republic of Belarus and the State Customs Service of Ukraine will participate in certain project activities (e.g. Common Contact Points)

The State Border Committee of the Republic of Belarus (SBC BY) is progressing with its objective to become a non-military fully professional organisation by 2018. The structure of the SBC BY is organised around four directorates and six departments at central level. Currently, this service encompasses a total of about 13,000 staff, less than 2,000 of whom are conscripted. The SBC BY operates within a strong legislative framework that generally conforms to those standards described in the IBM Guidelines for the Western Balkans, Schengen Catalogue and the EU Customs Blueprints. However, joint examinations or inspections by border agencies are currently not undertaken.

The total manpower of the State Border Guard Service of Ukraine (UA SBGS) is about 50,000, including 8,000 civilians. The UA SBGS switched to a contracted personnel system in 2008. The organisational structure of the UA SBGS has four levels: Central Administration in Kiev, Regional Directorates (Northern, Western, Eastern, Southern and Azov-Black Sea), Border Guard Detachments under command of the Regional Directorates and Border Guard (BG) Units (BCPs, Border Surveillance Posts and Marine Guards). The UA SBGS is currently going through an intensive organisational and logistical reform process based on the Concept for the UA SBGS Development until 2015. This comprehensive document provides a reform plan of the UA SBGS divided into three stages to reach compliance with European standards and border regulations. So far, noticeable progress has already been achieved in transforming the UA SBGS from a paramilitary to an EU-type law enforcement service in the fields of legislation, recruitment, training and career development.

The final beneficiaries of this action will be individuals and economic actors that cross borders *legally*. In addition, improved border management will also contribute to the fight against cross-border crime.

## 4. IMPLEMENTATION ISSUES

# 4.1. Financing agreement

In order to implement this action, it is not foreseen to conclude a financing agreement with the partner country, referred to in Article 184(2)(b) of the Financial Regulation.

# 4.2. Indicative operational implementation period

The indicative operational implementation period of this action, during which the activities described in sections 3.2. and 4.3. will be carried out, is 48 months, subject to modifications to be agreed by the responsible authorising officer in the relevant agreements.

# **4.3.** Implementation components and modules

This action will be implemented in *joint management* with the International Organization for Migration (IOM). This implementation is justified because:

- there are very few other international organisations which are permanently present in both beneficiary countries and which have expertise in border management projects;
- IOM can build on its long-term relationship with project beneficiaries, something that is particularly important in Belarus;
- due to its extensive experience in implementing projects in the region, it can be assumed that project activities will start soon after the adoption of the Financing Decision and the

signature of the contribution agreement; this experience is particularly valuable in Belarus where project registration procedures with the Ministry of Economy are rather complicated and time-consuming;

- IOM has successfully implemented several projects funded by the EU in the recent past, including SURCAP;
- experience shows that IOM is a flexible project implementer, usually taking the donor organisation's suggestions and ideas fully on board.

Joint management with this international organisation in accordance with Article 53d of Financial Regulation 1605/2002 is possible because the organisation is bound by a long-term framework agreement (Framework Agreement between the Commission and IOM of 8 November 2011). Furthermore, the project will be elaborated jointly between the organisation and the European Commission and this action is a multi-donor action pooling funds of several donors which are not earmarked for specific expenditure.

IOM will implement the project in partnership with the International Centre for Migration Policy Development (ICMPD), which does not have a representation office in Minsk. ICMPD successfully passed the four-pillar assessment in accordance with Article 53d of the Financial Regulation No 1605/2002.

This cooperation between the two international organisations is justified for the following reasons:

- ICMPD's good performance when implementing SURCAP as IOM's partner organisation;
- Being the implementer of the former IBM Flagship Initiative Project (IBM FIT), ICMPD is best placed to ensure full coherence between the two projects;
- ICMPD will bring its extensive experience in border management, and IBM in particular, into the project.

ICMPD's input in project activities will be threefold: organisational and content-wise supervision of study visits in Europe, provision of specific expertise for seminars and workshops in the beneficiary countries complementing IOM's data base of experts, and ensuring coherence with other IBM Flagship projects in the region.

The international organisation (IOM) will award and implement all contracts implementing the action in accordance with the procedures and standard documents laid down and published by IOM.

The change of method of implementation constitutes a substantial change except where the Commission "re-centralises" or reduces the level of budget-implementation tasks previously entrusted to the international organisation.

# 4.4. Scope of geographical eligibility for procurement in direct centralised and decentralised management

Subject to the following, the geographical eligibility in terms of place of establishment for participating in procurement procedures and in terms of origin of supplies and materials purchased as established in the basic act shall apply.

The responsible authorising officer may extend the geographical eligibility in accordance with Article 21(7) of the basic act (ENPI) on the basis of the unavailability of products and services

in the markets of the countries concerned, for reasons of extreme urgency, or if the eligibility rules would make the realisation of this action impossible or exceedingly difficult.

# 4.5. Indicative budget

Module	Amount in EUR thousands	Third party contribution in EUR thousands (indicative)
Joint management with IOM	5,100	250 (IOM)
Totals	5,100	250

## 4.6. Performance monitoring

The contribution agreement is expected to be subject to regular internal (EU Delegation staff) and external (ROM) monitoring. The IOM will arrange steering committee meetings, indicatively to be organised on a bi-annual basis, with participation of representatives of both beneficiary countries and the EU Delegation(s). The basic aim of these meetings will be to regularly review progress made on project implementation and to ensure the highest degree of ownership by both beneficiary countries.

## 4.7. Evaluation and audit

It is planned to launch a mid-term evaluation of both SURCAP and this contribution agreement with IOM, carried out by independent consultants and funded under other sources than the project budget. Timing for its implementation: spring 2015.

## 4.8. Communication and visibility

Visibility expenditure will be financed under the budget of the Contribution Agreement.

Press conferences will be organised by IOM in close coordination with the EU Delegation in charge. Additional briefings of representatives of the media by both EU Delegation staff and IOM will be held on an ad-hoc basis during project implementation.

Results of the project will be published, as necessary, using all means available to the EU Delegation (e.g. TV programme, EU Delegations' websites, press releases).

IOM will be requested to prepare and implement an "EU visibility plan" that will comply with the Communication and Visibility Manual for EU External Actions.