1. **Basic Information**
   1.1 CRIS Number: 2004/016-829.02.03  
      Twinning No: PL2004/IB/FI/02
   1.2 Title: Competition protection
   1.3 Sector: Internal Market
   1.4 Location: Poland

2. **Objectives**
   2.1 Overall Objective(s):
      - efficient and proper application of the EU competition rules and procedures
      - enhancing competition culture and market players’ awareness of competition rules

   2.2 Project purpose:
      - strengthening professional competencies of competition executives – acquisition of practical experiences
      - strengthening professional competencies of judiciary
      - boosting a transparent and convincing competition culture
      - promoting antitrust rules amongst all market participants

   2.3 Justification
   With reference to Comprehensive Monitoring Report on Poland’s preparations for membership (from November 2003): Chapter 6 *Competition policy.*

   In the **anti-trust sector,** Poland has adopted legislation containing the main principles of the Community anti-trust rules as regards restrictive agreements, abuse of dominant position and merger control. However, preparations should continue for the application of the EU’s new procedural regulation. In view of the decentralised application of the antitrust rules under the EU’s new procedural regulation, further strengthening of the administrative capacity would still be opportune. Further efforts are still needed to raise awareness of the anti-trust rules of all market participants and to build up a credible and transparent competition culture. Special training for judges should be further developed.

   Taking into consideration the CMR remarks, activities in the past and on-going antitrust/state aid Phare projects (see point 3.2) as well as real needs of the OCCP and involved parties, this project is aimed at further development of competition protection policy in Poland, i.e. at strengthening professional competencies of competition executives in the field of antitrust, strengthening the enforcement capacities of the judiciary in the scope of the EC anti-trust and state aid law, providing respective bodies access to credible information for case handling and raising public awareness by disseminating information and promoting competition culture and competition rules. Therefore this project will ensure further strengthening of the administrative capacity indispensable for carrying out effective competition policy.

   This project does not foresee the state aid activities for the OCCP due to the fact that great number of actions has been recently completed or will be realized in 2004. What is more Poland is obliged to ensure proper enforcement of state aid measures before the activities under Transition Facility can be realized.

3. **Description**
   3.1 Background and justification:
In order to ensure an effective enforcement of the Community competition rules and the proper functioning of the cooperation mechanisms, the proposed project mainly is focused on the acquisition of practical experience of the OCCP staff (case studies, experts’ support in handling of normal cases) and contacts with EU Member States competition officials (workshops in Poland). In CMR it is suggested to further concentrate on activities in the state aid area – especially as regards aid for the sensitive sectors. However, as there have been already many activities completed and foreseen to be realized within hitherto Phare projects (see point 3.2), it seems advisable not to include a separate state aid component in this project (especially as the OCCP would like to exclude the risk of overlapping of activities in the above-mentioned area).

The practical aspects of applying of EC competition provisions as well as rules of cooperation between national antimonopoly authorities and the European Commission and antimonopoly authorities of other EU Member States in the framework of European Competition Network (ECN) are the major aspects covered by the project.

Economics and market analyses (in selected sectors) as they are indispensable for applying of relevant rules are reflected in the project as well.

This project is also designed to accustom the judiciary with the practice and experience gathered by the MS national courts in applying the EC competition law thus assure that the Polish judiciary is well prepared to enforce the Community law effectively.

Expertises and market researches will support the OCCP case handlers in the most complex and difficult markets (e.g. telecommunications sector, energy sector etc.).

All of above-mentioned activities will be supported by information activities in order to assure the maximum possible impact on all market players.

The project will be also focused on addressing the institution building gaps highlighted during the monitoring process (see point 2.3).

It has to be stressed that activities planned in Transition Facility are complementary to the previous ones realized within Phare projects (see point 3.2) and continuation of achieved results is of a great importance and will be assured. Bearing in mind that Transition Facility addresses the issues which have not yet been covered by pre-accession assistance in such a wide scope, doubling of efforts or activities is excluded.

3.2 Linked activities:

As regards projects related to the area covered by this particular project, the Office for Competition and Consumer Protection benefited from the presented below assistance.

**Phare 2000, PL0004.03 Competition and consumer protection:** the main focus of the project consisted in creating market surveillance system consistent with the EU models, in its antitrust part the project envisaged legal assistance in drafting secondary legislation and in improving existing enforcement procedures, as well as improvement of professional skills of the OCCP staff. This project (i.e. the last component – twinning covenant) accomplished on 21 August 2003.

**Phare 2001, PL0102.05 Competition policy and consumer protection:** addressed to competition and consumer protection issues with additional component dedicated to state aid issues (Technical Assistance) and in its main part is a follow-up of Phare 2000. Mainly the project focuses on strengthening of consumer awareness in Poland (grant support to consumer NGOs), on promoting consumers interests and on improving professional skills of OCCP and TI staff as well as consumer advocates at the base of German and Austrian experience (twinning component, ref. no. PL/IB/2001/EC/08). There is a small part of twinning covenant devoted to competition policy. Under the component dedicated to state aid issues (in the form of TA), there are envisaged training courses in Poland for public authorities granting aid, beneficiaries of state aid and employees of the Department of State Aid Monitoring (the
OCCP) as well as practical workshops abroad (study visits) for the OCCP representatives (start in 1st/2nd quarter 2004). Moreover, under this contract state aid legislation will be published (English and Polish language, in the form of hard copies and CD-ROMs).

**Phare 2001, PL0101.05 Flexible reserve. Support to the integration process. Twinning light (PL01/IB/EC09TL) – Competencies of judiciary in application of the EC competition rules:** this project is designed to accustom the judiciary with the practice and experience gathered by the MS national courts in applying the EC competition law. Under this contract it is envisaged to train c.a. 185 judges in the subject of antitrust and state aid issues (in particular: restrictive agreements, abuse of a dominant position, merger control, state aid definition, conditions for admissibility of state aid, application of EC state aid law by MS national courts etc.).

**Phare 2001, Project PL 0101.15.10: service contract for Support to the integration process. Training courses on state aid issues for the Office for Competition and Consumer Protection (State Fund for Rehabilitation of Disabled Persons (PFRON), enterprises of protected work, selected groups of entrepreneurs in sensitive sectors):** the beneficiary of activities performed within the contract was the Office for Competition and Consumer Protection (OCCP): Department of State Aid Monitoring, and in particular – employees of PFRON (the State Fund for Rehabilitation of Disabled Persons (the donor of state aid), enterprises of protected work and selected groups of entrepreneurs from sensitive sectors (motor vehicles, steel, shipbuilding and coal mining). The trainings had nationwide reach and took place in sixteen voivodeships of Poland. Consequently, 1150 persons, donors and beneficiaries of aid in sensitive sectors were trained and acquainted with the new provisions concerning state aid. Participants were provided with summary of the seminars, text of the Act on state aid and texts of the relevant implementing regulations for proper sectors.

3.3 Results:
The project, accordingly with its objectives, should bring the following results:

**Twinning**
- proper application of the EU new procedural regulation by the OCCP case handlers
- direct contacts with case handlers of the EU MS competition authorities established (allowing for further co-operation in case of joint investigations)
- competences and practical knowledge of competition executives upgraded – internal statistics done
- judges trained in theoretical and practical way, resulting in assuring consistent application of the relevant EU competition provisions in compliance with EC and MS practice

**TA 1 – expertises/analyses**
- required market analyses/expertises provided – resulting in strengthening the OCCP knowledge (case-handlers) and capacities
- selected analyses/expertises published (under the TA 2)

**TA 2 – raising awareness/publications**
- awareness raising campaign resulting in nationwide activities, both media and publications, realized
- series of inserts published
- bulletin "Competition law everyday" issued

3.4 Activities:

**Contract 1 – Twinning**
Component 1 – OCCP

This component is aimed at strengthening professional competencies of competition executives (OCCP) especially in the following areas through training sessions and EU experts’ consultations:

- training courses on particular competition issues (1-2 days sessions, c.a. 10-20 persons on each session to be effective):
  - new issues, doctrines and concepts of competition law used by other antimonopoly bodies
  - rules of cooperation between national antimonopoly authorities and European Commission, and antimonopoly authorities of other EU Member States in the framework of European Competition Network (ECN)
  - methodology of conducting proceedings concerning agreements violating competition and collecting evidence (e.g. control and search as ways of gathering evidence)
  - collective dominant position – theoretical basis, possibility of putting into practice, analysis of European cases (case studies)
  - leniency policy (case studies, MS experience)
  - division of competence between antimonopoly authorities and courts in the EU
  - control of concentration – new regulation of the European Commission (in particular methodology of verification of an application concerning intention of concentration), distribution networks of producers (in particular concentrations on the level of wholesale trade)
  - sectoral studies on the basis of Article 17 of Council Regulation (EC) No. 1/2003 as an instrument for monitoring of markets
  - fighting cartels in the cement industry sector
  - railway transport – issues concerning question of separating infrastructure from carrying out actual railway transport
  - EU policy in the area of functioning of selected markets/sectors and the EU jurisdiction in the field of competition rules: artificial fertilizers, pharmaceutical industry, sea transport (inclusive functioning of seaports), distribution of new car vehicles, public utility sector
- training sessions on economic aspects and using of analytical tools in competition proceedings (1-2 days sessions, c.a. 10-20 persons on each session to be effective):
  - quantitative methods of economic analysis for defining relevant market
  - entrepreneurs’ behaviour in imperfect competition – economic perspective
  - economics in competition law
  - methodologies applied by competition economics (practical examples of their application)
- workshop for local and national media journalists on competition rules (to increase public awareness). The post-workshop conference will be organised in order to take advantage of gained knowledge
- ad hoc expert visits in order to consult current problems, especially in the area of defining relevant markets (telecommunication, the Internet, cable TV, energy sector, media, postal services, liquid fuels, steel industry, construction materials industry) and imposing of onerous contract conditions. Twinning experts will elaborate relevant materials which could be used in the “Competition law everyday” bulletin.

Component 2 – judges

This component is envisaged to accustom the judiciary with the practice and experience of MS national courts in applying the EC competition law.
The main goal of this part of the twinning is to carry out trainings aiming at strengthening the enforcement capacities of the judiciary in the scope of the EC anti-trust and state aid law. This activity will be continuation of trainings carried out in the framework of PL01/IB/EC09TL – *Competencies of judiciary in application of the EC competition rules* taking into consideration new tasks and competences of courts in this field, changes of law as well as there will be also new groups of judiciary trained in the framework of this twinning.

It is envisaged to conduct at least:

- 2 training sessions (2 days each) in 7 regions of Poland in the scope of antitrust (ca. 20 judges in each session)
- 1 training session (2 days) in 7 regions of Poland in the scope of state aid (ca. 20 judges in each session)
- 5 specially tailored training sessions (1 day) for judges of Polish Competition and Consumer Protection Court in the scope of anti-trust (for 5 judges of CCPC)

**EXPERTS’ PROFILE:**

*Profile of Member State’s Coordinator of the twinning (RTA):*

- professional experience in competition authorities or relevant European institutions
- excellent knowledge on the EU competition law and the adoption of the *acquis* in one or more Member States
- teaching experience
- preferable diploma in law or economics or administration
- experience in institution building
- experience in managing of international projects (experience in managing Phare projects will be seen as an advantage)

*Short-Term Experts/Medium-Term Experts (the OCCP):*

- excellent knowledge on competition authorities and procedures and the EU competition law
- professional experience in the area of European Competition law application (case handlers and economists).
- experience in designing and developing of training programmes
- experience in preparing teaching materials and publications

*Short-Term Experts/Medium-Term Experts (judges):*

- professional experience in the area of European Competition law application (anti-trust and state aid)- preferably judges with experience in the assessment of cases

**Contract 2 – Technical assistance 1 (expertises/analyses)**

One of the methods to strengthen professional competencies of competition executives is to perform thorough examinations of markets and permanent monitoring activity concerning changes of market players’ behaviour in the unstable economic situation. Providing the OCCP with the expertises and market researches in order to assure the credible information for case handling. The elaborated materials will used by the OCCP for further development of competition policy as well.

It is envisaged that selected expertises will be the basis for publications under twinning.

**LOT 1 (225 000€ TF + 25 000€ co-financing)**

- legal barriers of integration of national market of services into the EU Single Market
- analysis of market of pharmaceuticals (pharmaceutical products)
- open-pricing systems as particular, nonstandard forms of cartel
- analysis of most characteristic (precedential) cases in the field of competition restricting agreements, herein distribution agreements (proceedings of EC or national bodies)
• analysis of mutual competitive position of Polish seaports in the scope of shipment: bulk, less container loaded (LCL) and cargo, and changes after accession to the EU
• methodology and analytical tools in the field of transport runs operated by different modes of transport (multimodal transport), especially taking into consideration issues connected with their substitution and complementarity
• synergy between competition policy and consumer protection policy

LOT 2 (200 000€ TF)
• telecommunication – new technologies, local loop, relevant markets
• media – relevant markets, advertising market, concentrations, abusing of dominant position
• post – functioning of selected markets in the EU countries, new forms of postal activity
• energy sector – vertical concentrations, barriers restricting access of third parties to network in natural monopolies, liberalisation of electric energy and gas sectors, TPA rule
• expertises concerning selected subjects connected with implementation of competition law; e.g. definition of relevant geographic market of hypermarkets, definition of relevant market with reference to spirit products

Contract 3 – Technical assistance 2 (raising awareness/publications)
The following publications and activities will be aimed at raising awareness of the antitrust rules of all market participants and to build up a credible and transparent competition culture:
• series of publications – inserts: “Get to know the European Market – everything about competition” (e.g.: barriers of integration on national market of services into EU Single Market; nonstandard forms of cartel and leniency; most precedential cases in the field of competition restricting agreement; market of pharmaceuticals; tools in the field of transport.)
• ”Competition law everyday” bulletin addressed to all of market participants who deals with protection and promotion of competition rules. It will include: elaboration (on the basis of twinning experts’ materials), designing, printing and distribution of 6 editions in printing and electronic version
• nationwide dissemination of informative materials aimed at enhancing public awareness of key competition rules and competition culture (i.a. materials printed within the project)
• printing of selected expertises prepared under the technical assistance contract 2 – Expertises to be published will be chosen after completion of contract 2 (TA 1)

3.5 Lessons learned:
The only interim evaluation for the competition policy was done by EMS for project PL9905.04 State Aids Control in September 2002.
Bearing in mind above-mentioned evaluation and hitherto experience in realization of Phare projects, the OCCP has decided to continue programming projects in the field of competition protection aimed at strengthening competition policy:
• further strengthening the administrative capacity of the OCCP,
• raising public awareness by disseminating information about competition culture/rules,
• strengthening competencies of judiciary on the basis of experience gathered during realization of this project PL0101.05 the OCCP has decided to continue trainings for judiciary (and include in these trainings judiciary from new administrative courts established on 1 January 2004). The information provided by judges already trained show that the number of training sessions should be extended both for new judges and trained ones in the field of new aspects.
Experiences gathered in the course of realisation of project PL9905.04 State Aids Control as well as recommendations made by EMS are taken into consideration in current project – i.e.
the budget calculation and number of experts and activities reflect the real organisational possibilities.

4. **Institutional Framework**

The Office for Competition and Consumers’ Protection will co-ordinate the project in its capacity of government competition protection authority. Department of Foreign Assistance, Budget and Administration is responsible for the co-ordination of the entire project (twinning Contract, TA and grant scheme), although it will be supported by the technical department: the Department of Competition Protection. However, there are also other beneficiaries of training activities: judges (cooperation with the Ministry of Justice will be continued as in the project PL0101.05), entrepreneurs and journalists. The implementation of the project will cause no institutional changes.

5. **Detailed Budget**

<table>
<thead>
<tr>
<th>Transition Facility Support</th>
<th>Investment Support</th>
<th>Institution Building</th>
<th>Total TF(I+IB)</th>
<th>National Co-financing*</th>
<th>TOTAL</th>
</tr>
</thead>
<tbody>
<tr>
<td>Contract 1 – Twinning</td>
<td>0</td>
<td>655 000</td>
<td>655 000</td>
<td>90 000</td>
<td>745 000</td>
</tr>
<tr>
<td>Contract 2 – TA 1</td>
<td>0</td>
<td>425 000</td>
<td>425 000</td>
<td>25 000</td>
<td>450 000</td>
</tr>
<tr>
<td>Contract 3 – TA 2</td>
<td>0</td>
<td>170 000</td>
<td>170 000</td>
<td>20 000</td>
<td>190 000</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>0</td>
<td><strong>1 250 000</strong></td>
<td><strong>1 250 000</strong></td>
<td><strong>135 000</strong></td>
<td><strong>1 385 000</strong></td>
</tr>
</tbody>
</table>

6. **Implementation Arrangements**

6.1 **Implementing Agency**

**PAO**: Tadeusz Kozek, Under-secretary of State at the Office of the Committee for European Integration, Al. Ujazdowskie 9, 00-918 Warszawa; phone +48 22 455 52 41, fax +48 22 455 52 43

**CFCU**: Foundation Co-operation Fund, CFCU Director, ul. Górnośląska 4a, 00-444 Warszawa, ph. +48 22 622 88 20, fax +48 22 622 75 65

The CFCU is responsible for handling tendering, contracting and payments of contracts on behalf of the OCCP.

6.2 **Twinning**

**Contact person in the OCCP:**
Ms Magdalena Jaworska, Director, Department of Foreign Assistance, Budget and Administration, phone: +48 22 827 67 27, fax: +48 22 827 08 43, e-mail: mjaworska@uokik.gov.pl

6.3 **Non-standard aspects**

n.a.

6.4 **Contracts**

**Contract 1 - Twinning**:  
0.655 MEUR (TF) + 0.090 MEUR (parallel co-financing) = 0.745 MEUR

**Contract 2 – TA 1 – expertises and analyses:**
0.425 MEUR (TF) + 0.025 MEUR (joint co-financing) = 0.450 MEUR – gross value

**Contract 3 – TA 2 – raising awareness and publications:**
0.17 MEUR (TF) + 0.02 MEUR (joint co-financing) = 0.190 MEUR – gross value

7. **Implementation Schedule**

7.1 Start of tendering/call for proposals
   4th quarter 2004/1st quarter 2005

7.2 Start of project activity
   1st/2nd quarter 2005

7.3 Project Completion
   1st quarter 2007

8. **Sustainability**

Practical training courses (case studies, workshops, advisory activities by handling of normal cases) for the OCCP case handlers will assure that the Office will have the necessary capacity and required international contacts in order to co-operate in required way with the EC and other National Competition Authorities.

Training is foreseen for all case handlers as well as for market analysts and lawyers of the OCCP. Moreover, analyses and expertises will be used as additional materials which will support further investigations, which will reinforce institutional capacity and monitoring activity of the OCCP and thanks to which case handlers will be able to reveal infringements in the more effective way.

9. **Conditionality and sequencing**

**Conditionality**

There are no conditionalities for project start and operation (as competition policy is realised constantly).

**Milestones and sequencing**

- Signing of the Financing Memorandum
- Preparation of relevant technical documentations for contracts and start of tender procedures
- Twinning activities
- Providing relevant market researches according to the beneficiary specific needs
- Dissemination of printed publications
- Approval of a project’s final report.
**LOGFRAME MATRIX:**

<table>
<thead>
<tr>
<th>Project:</th>
<th>Programme name and number:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Competition protection</strong></td>
<td>Contracting period expires n.a.</td>
</tr>
<tr>
<td></td>
<td>Disbursement period expires n.a.</td>
</tr>
<tr>
<td></td>
<td>TOTAL BUDGET OF THE PROJECT EUR 1 385 000</td>
</tr>
<tr>
<td></td>
<td>Transition Facility Budget EUR: 1 250 000</td>
</tr>
</tbody>
</table>

### Overall objective
- efficient and proper application of the EU competition rules and procedures
- enhancing competition culture and market players’ awareness of competition rules

<table>
<thead>
<tr>
<th>Objectively Verifiable Indicators</th>
<th>Sources of Verification</th>
</tr>
</thead>
<tbody>
<tr>
<td>case handlers of the OCCP headquarters and branch offices (c.a. 50) and judges (c.a. 185) ready to apply antitrust and state aid provisions EU procedures by the end of the project</td>
<td>Interim evaluation report</td>
</tr>
<tr>
<td>entrepreneurs provided with comprehensive information on competition rules expected to apply them</td>
<td>OCCP internal statistics</td>
</tr>
<tr>
<td>positive evaluation conclusions</td>
<td>Courts internal statistics</td>
</tr>
<tr>
<td></td>
<td>Media</td>
</tr>
</tbody>
</table>

### Project purpose
- strengthening professional competencies of competition executives – acquisition of practical experiences
- strengthening professional competencies of judiciary
- boosting a transparent and convincing competition culture
- promoting antitrust rules amongst all market participants

<table>
<thead>
<tr>
<th>Objectively Verifiable Indicators</th>
<th>Sources of Verification</th>
<th>Assumptions</th>
</tr>
</thead>
<tbody>
<tr>
<td>General remark: please note that personnel participates in training sessions repeatedly</td>
<td>Reports of experts</td>
<td></td>
</tr>
<tr>
<td>case handlers of the OCCP headquarters and branch offices (c.a. 50) as well as judges (c.a. 155) trained by the end of the project in envisaged scope</td>
<td>Monitoring progress reports</td>
<td></td>
</tr>
<tr>
<td>assuring the access to credible information for case handling – c.a. 10 expertises for the OCCP provided</td>
<td>Media</td>
<td></td>
</tr>
<tr>
<td>printed information materials disseminated among entrepreneurs (preceded with the OCCP information action).</td>
<td>Stable state of human resources (trained staff remains within structures of the OCCP and courts)</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Media interest in promotion of competition culture</td>
<td></td>
</tr>
<tr>
<td>Results/Outputs</td>
<td>Objectively Verifiable Indicators</td>
<td>Sources of Verification</td>
</tr>
<tr>
<td>-------------------------</td>
<td>----------------------------------------------------------------------------------------------------</td>
<td>---------------------------------------</td>
</tr>
<tr>
<td><strong>Twinning</strong></td>
<td>• proper application of the EU new procedural regulation by the OCCP case handlers&lt;br&gt;• direct contacts with case handlers of the EU MS competition authorities established (allowing for further co-operation in case of joint investigations)&lt;br&gt;• competences and practical knowledge of competition executives upgraded – internal statistics done&lt;br&gt;• judges trained in theoretical and practical way, resulting in assuring consistent application of the relevant EU competition provisions in compliance with EC and MS practice</td>
<td>Issued publication and training materials&lt;br&gt;Studies and analyses&lt;br&gt;Lists of participants&lt;br&gt;Training evaluation questioners&lt;br&gt;OCCP internal statistics&lt;br&gt;Media</td>
</tr>
<tr>
<td><strong>TA 1 – expertises/analyses</strong></td>
<td>• required market analyses/expertises provided – resulting in strengthening the OCCP knowledge (case-handlers) and capacities&lt;br&gt;• selected analyses/expertises published (under the twinning Contract)</td>
<td>c.a. 20 training sessions performed for the judges during the project implementation period&lt;br&gt;1 workshop and 1 national conference for journalists on competition rules organised during the project implementation period&lt;br&gt;all TA contracts realised under the relevant tender procedures by end of the project&lt;br&gt;at least 4 inserts and 4 publications on competition matters issued by the end of the project&lt;br&gt;c.a. 2 analyses/expertises used by the case handlers during proceedings/investigations&lt;br&gt;impact of information campaign – media reports and opinion polls carried out by the end of the project</td>
</tr>
<tr>
<td><strong>TA 2 – raising awareness and publications</strong></td>
<td>• awareness raising campaign resulting in nationwide activities, both media and publications, realized&lt;br&gt;• series of inserts published&lt;br&gt;• bulletin &quot;Competition law everyday&quot; issued</td>
<td></td>
</tr>
<tr>
<td><strong>Activities</strong></td>
<td><strong>Objectively Verifiable Indicators</strong></td>
<td><strong>Sources of Verification</strong></td>
</tr>
<tr>
<td>Twinning (incl. training for judiciary)</td>
<td>Twinning: c.a. 50 – 55 short term experts (the number of experts’ working days is unpredictable, at least 25 days of effective training); training for judiciary: c.a. 10 short term experts</td>
<td>Financial documentation&lt;br&gt;Monitoring progress reports&lt;br&gt;Media</td>
</tr>
<tr>
<td>Competition protection</td>
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<td>------------------------</td>
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<tr>
<td>Preconditions</td>
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<tr>
<td>None</td>
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</tbody>
</table>

- (the number of experts’ working days is unpredictable, at least 20 days of effective training)
- Publications printed under the project distributed nationwide
- TA 1: c.a. 10 analyses elaborated (the number of experts working on analyses is unpredictable, at least 1 expert on one analysis)
ANNEX 2-4 Implementation, contracting and disbursement schedules

Date of drafting: 01.2004
Planning period: 11.2004-2006

<table>
<thead>
<tr>
<th>PLANNED</th>
<th>Budget Allocation</th>
<th>Cost Estimate in MEUR</th>
</tr>
</thead>
<tbody>
<tr>
<td>IV ‘04</td>
<td>I ‘05</td>
<td>II ‘05</td>
</tr>
<tr>
<td>I</td>
<td>II</td>
<td>III</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
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<tr>
<td>D</td>
<td>DC</td>
<td>DCI</td>
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<tr>
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<tr>
<td></td>
<td>0.1</td>
<td>0.4</td>
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</tbody>
</table>

Legend: D= design of project; C= tendering and contracting; I= contract implementation and payment