1. **Basic Information**
   
   1.1 **CRIS Number**: 2006/018-180.02-02  
   **Twinning No**: PL/06/IB/OT/02/TL
   
   1.2 **Title**: Competition and consumer protection policy
   
   1.3 **Sector**: Internal Market
   
   1.4 **Location**: Poland, Office of Competition and Consumer Protection, HQ in Warsaw and Branch Offices in Gdańsk, Kraków, Katowice, Łódź, Lublin, Bydgoszcz, Poznań, Wrocław and Warsaw.

2. **Objectives**

   2.1 Overall Objective(s):
   - ensuring the same high level of consumer and competition protection activities in Poland as in the EU-15

   2.2 Project purpose:
   - providing the competition and consumer protection professionals with tailored training and expertise on detailed aspects of application of European law and procedures (practise and expertises)
   - providing entrepreneurs with necessary knowledge on consumer rights and business responsibilities within the Internal Market
   - deepening the awareness of consumers and business on the Internal Market by providing within the project objectively verified information (researches) both consumer and competition ones

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.

   Taking into consideration the CMR remarks, activities in the past and on-going antitrust/state aid Phare and Transition Facility 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 providing respective bodies access to credible information for case handling and raising public awareness by disseminating information and promoting competition culture and competition rules. In the CMR it is also stressed, that the OCCP should focus on serious distortions of competition, such as cartels, as well as on reinforcing the policy of sanctions (fines on competition infringements). 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 2005/2006 (Transition Facility 2004 flexible reserve).


“Enforcement activities relating to the protection of the economic interests of consumers are partly developed. More efforts are needed in effectively implementing the acquis, in particular with regard to the judicial capacity concerned with consumer cases. The administrative structures in terms of both financial and human resources need to be further developed and strengthened.

Consumer information and education need to be further promoted in order to increase the level of consumers’ and businesses’ awareness of their rights and responsibilities.”

One of the most important objectives of support development of the consumer protection policy and market surveillance system, is to assure the systematic upgrading of qualifications of individuals. Acting in line with relevant needs, this project will provide the possibility to upgrade practical skills and to exchange know-how (e.g. case studies) with Member States’ practitioners by all institutions responsible for ensuring consumer protection and consumer safety in Poland, i.e. the OCCP, Trade Inspection’s representatives, consumer associations and consumer ombudsmen.

Acting in line with the EC comments to the PBO table for TF 2004 – 2006, the OCCP decided to design this project, in order to meet the following EC comments to the consumer protection projects envisaged for 2005 and 2006:

“It is also suggested that the project would be maintained in the three years of this programme”

“Some clarification regarding exact content and beneficiaries are required in order to make a final assessment, although the idea is acceptable. It is furthermore suggested that the project would cover the three years of this programme.”

All activities foreseen under the proposed project are carefully assessed in order to be justified for conducting under all editions of TF. As all TF 2004 tender documents are ready at this moment, it is clear that the activities are not overlapping with each other in these two allocations; however they are serving to achieve the wide objective of projects – i.e. assuring the same high level of consumer and competition protection activities in Poland as in the EU-15.

3. Description

3.1 Background and justification:

The overall Transition Facility objectives related to competition and consumer protection policy can be achieved fully by performing the complex range of activities aimed at the same purpose. As TF 2004 specific activities (topics and scope) are different than foreseen under TF 2006, the current project serves to achieve the objectives on a wider scale than the whole TF 2004-2006 allocation.
Bearing in mind that the aims of competition and consumer protection are wide by their nature all proposed projects within TF reflect the most relevant and justifiable for EU support aims, in order to provide OCCP and all other stakeholders with best value of received support. The results of both projects’ allocation TF 2004 and 2006 are quantifiable, and in both cases are different, so there is no risk of overlapping of activities, which however serve the one wide objective - assuring the same high level of consumer and competition protection activities in Poland as in the EU-15.

The proposed project in its competition part is focused on the further and more detailed acquisition of practical experience of the OCCP staff, especially its branch offices (case studies, experts’ support in handling of normal cases).

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 already been many activities completed and foreseen to be realized within hitherto Phare and planned TF flexible reserve projects (see point 3.2), it seems advisable not to include a separate state aid component in this project - with the exemption of publications and one expertise.

This project is focused on training on selected competition topics, economics and market analyses (in selected sectors) as they are constantly indispensable for applying of relevant rules as well as on expertises and market researches, which will support the OCCP case handlers in the most complex and difficult markets.

Activities proposed within the project are at the current stage of Polish membership in the EU and hitherto EU assistance these ones which are justified by day-to-day practice with application of binding law and binding procedures.

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

In the relation to the consumer part of the project, it must be indicated that the Community Strategy for Consumer Policy 2002-2006 has three basic objectives:
   1) a high common level of consumer protection,
   2) effective enforcement of consumer protection rules, and
   3) proper involvement of consumer organisations in EU policies.

And this project continues actions aimed at ensuring the effective tools for achieving these goals as well as covers actions which are needed, accordingly to the evaluation of activities included in the Transition Facility 2004.

It also considers the results achieved in these areas in Poland under previous EU co-financed projects and actions undertaken by the OCCP as well as the real and foreseeable needs of consumer protection system’s stakeholders. Furthermore the project is aimed at further improving in particular two of four main objectives established in the governmental consumer protection policy 2004-2006 strategy, i.e.:
   - creating a safe, consumer-friendly market;
   - conducting a pro-active information and educational policy.

The activities proposed within this project will also focus on disseminating reliable information on consumer safety and consumer protection legislation among business representatives as well as on providing reliable data (research).

The activities within this project are to be covered by the following contracts:
**Contract 1 – Twinning light**

**Contract 2 – Technical assistance 1 - sociological researches on consumer attitudes and competition aspects.**

**Contract 3 – Technical Assistance 2 – expertises/analyses**

It has to be stressed that activities planned in Transition Facility 2006 are complementary to the previous ones realized within relevant Phare and Transition Facility 2004 and 2005 projects (see point 3.2) and continuation of achieved results is of a great importance and will be assured.

The main reason of the project is to assure the highest scope of provided assistance which in result will answer all needs notified within the whole period of Phare and TF programming lifetime and to assure full accomplishment of all supporting activities related to the competition and consumer protection in Poland. To this end the activities covering practical training – how to operate within EU particular procedures in relation to consumer law as well as how to proceed with specific topics in relation to competition protection are designed. To complete the training proposed, the sociological research providing answers on Polish consumers and entrepreneurs awareness level after the certain period of EU membership and especially after completing the complex information and education actions (under Phare and TF 2004) is also foreseen.

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) was 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 was a small part of twining covenant devoted to competition policy. Under the component dedicated to state aid issues (in the form of TA), there were envisaged training courses in Poland for public authorities granting aid, beneficiaries of state aid and employees of the Department of State Aid Monitoring (in the OCCP) as well as practical workshops abroad (study visits) for the OCCP representatives. Moreover, under this contract state aid legislation was 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 was 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 of Competition and Consumer Protection: 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.

**Phare 2002, PL2002/000-605.02.01 Market Surveillance** – the project was focused on reinforcing the existing market surveillance technical infrastructure and on improving Polish public administration qualifications and skills in the field of New Approach Directives (five investments’ contracts for market surveillance bodies and one Technical Assistance contract). This project was planned as a follow-up of Phare 2000. It involved the OCCP and four other agencies which are i.a. responsible for the effective functioning of market surveillance in Poland. These include: Trade Inspection (IH), Office of Telecommunications and Post Regulation (URTiP), National Labour Inspectorate (PIP) and State Mining Authority (WUG). None of the results of the project are related to the TF 2006.

**Phare 2003, PL2003/004-379/01.10 Strengthening the Consumer Protection Policy** The main goals of this project are: effective protection of consumer rights and interests by OCCP, consumer associations, consumer ombudsmen and conciliation courts, and raising awareness of consumer rights. The main actions to achieve these goals include strengthening of relevant mechanisms (Technical Assistance) and equipment (Investment component – purchase of IT equipment) as well as education and information activities (contracts for information/education campaign, training courses for OCCP officials and consumer ombudsmen). The improved technical infrastructure (purchase of IT equipment and creation of database) supporting the daily activities of bodies involved in consumer protection will help to achieve the objectives planned under TF 2004.

**Transition Facility 2004, Project PL2004/016-829.02.03 Competition Protection:** the main objectives of this project are to ensure an efficient and proper application of the EU competition rules and procedures and to enhance competition culture and market players’ awareness of competition rules. Under this project it is envisaged to carry out three contracts: **Twinning** – has started in September 2005 (with the following results envisaged: i.a. proper application of the EU new procedural regulation by the OCCP case handlers; direct contacts with case handlers of the EU MS competition authorities , allowing for further co-operation in case of joint investigations, theoretical and practical training for judges , resulting in assuring consistent application of the relevant EU competition provisions in compliance with EC and MS practice) and two TA contracts. i.e **TA 1 expertise/analyses** (resulting in strengthening the OCCP knowledge (case-handlers) and capacities) and **TA 2 – raising awareness/publications**

Competition and consumer protection policy
Competition and consumer protection policy


the project focuses on strengthening professional competencies of consumer protection executives (OCCP, Trade Inspection and ombudsmen) and representatives of consumer NGOs as well as on strengthening the conciliation courts’ arbiters’ professional skills. The other main goals of this project are: enhancing the involvement and the contribution of consumer associations to consumer protection system, providing reliable market surveillance and product safety data and information, increasing the level of consumers’ and businesses’ awareness of their rights and responsibilities as well as promoting consumer interests and rights.

The envisaged results of both TF 2004 projects do not create a basis for overlapping with the 2006 project’s results. The training activities within twinnings are focused on different topics and different target groups (in 2004 the target groups are in particular institution different than OCCP and judges).

The TA contracts under consumer project are envisaged for achieving the following results: 2 laboratory examinations and expertises in the MSS area, 3 analytical reports on selected consumer issues, 5 grants for consumer NGOs and information actions – which are not the subject of 2006 project.

The TA contracts under the competition project are envisaged for achieving the following results: expertises on detailed competition issues related to particular areas of competences of OCCP, information actions, publication and competition bulletin – which are not the subject of 2006 project.

Transition Facility 2005 Promoting Consumer Safety –

the main objective of this project is to ensure the same high level of consumer safety in Poland as it exists in the EU-15. There two main activities foreseen to achieve this goal. First of it is foreseen to purchase the envisaged equipment and delivery it to the Trade Inspection laboratories in order to reinforce testing capacity of TI laboratories in the scope of new analytical methods and to fulfil the obligations resulting from binding legislation (contract no 1 – Investments). It is also foreseen to carry out a training for testing personnel (contract no 2 – TA) which will result in having min. 100 persons responsible for testing trained on specific laboratory analytical methods in the light of new regulations and consumer tests methodology.

3.3 Results:

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

Contract 1 – Twinning light

- 30 persons from the OCCP (especially newly employed) are provided with practical knowledge on European procedures (eg. practical training on procedures applied by the Commission and Council in the scope of cooperation with MS, including different kind of working groups and their roles in European Commission and European Council)
- the OCCP personnel (esp. Consumer Policy Department and branch offices) provided with practical experiences from other MS on tendencies of the new jurisdiction of the ECJ in relation to consumer law
- complex publication published - containing review of jurisdiction made by twinning experts and resulting from the training conducted – mostly asked queries (paper publication, max 200 pages in Polish language)
- OCCP competition personnel – at least 30 persons (esp. enforcement Departments and branch offices) provided with practical experiences from other MS on i.a. the following topics: economic aspects of carrying out anti-trust proceedings, quantitative methods of defining the relevant markets, putting into practice SSNIP (small yet significant and non-
transitory increase in price) tests, analysis of costs in respect of entrepreneur's imposing predatory pricing or predatory pricing strategies which are to rule out other competitors of the market, criteria of regarding prices as excessively expensive or unfair, economic methods of entrepreneur’s costs evaluation when regarding them as excessively expensive
• expertises and analyses monitoring efficiency of OCCP’s actions undertook and analysing present situation on the market in the scope of consumer protection and consumer safety elaborated and provided to the Beneficiary;
• knowledge of business representatives improved (c.a. 400 persons; special training on binding regulations, most important consumer problems related to business responsibilities provided);

TA 2 – sociological researches
• at least 2 researches on consumer attitudes done
• information to adapt as the OCCP activities in order to strengthen consumers' activeness in a skilful and effective claims pursuit obtained .
• an indicator influencing the awareness and capability level among Polish consumers provided.
• a research completed and a/an report/analysis concerning the knowledge of competition protection policy among entrepreneurs operating throughout the country provided.

TA 3 – competition expertises/analyses
• required (at least 5) market analyses/expertises provided – resulting in further strengthening the OCCP knowledge (case-handlers) and capacities

3.4 Activities:

3.4.1. Contract 1 - Twinning light - 0.22 M€

The main objective of this contract is to carry out specific training courses for the OCCP representatives on the following subjects, within the 8 months of twinning light duration:

Consumer protection:

• practical training on procedures applied by the Commission and Council in the scope of cooperation with MS, including different kind of working groups and their roles in European Commission and European Council – in the fields of OCCP competences related to consumer policy ,
• practical training on tendency of the new jurisdiction of the European Court of Justice in relation to consumer law,
• practical training on different procedures before the European Court of Justice - practical aspects,

The paper publication summing-up the a/m part of the project (jurisdiction, procedures) will be also published (in Polish language).
• analyses and expertise on consumer issues proposed topics i.a.:
Competition and consumer protection policy

- on consumer protection problems during the period of EURO currency implementation;
- on consumer protection rules enhancing competition by improving market transparency, leading to more efficient consumer choices;

The final topics to be covered will be based on the OCCP assessment, which will reflect up-to-date situation.

Competition:

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

- competition restricting agreements (e.g. collecting of evidence, differentiating between agreements and parallel behaviours as well as market division);
- training concerning distribution and competition rules on the motor vehicle and car parts market regarding goals and effects of enforcement of the Commission Regulation (EC) No 1400/2002 of 31 July 2002 on the application of Article 81(3) of the Treaty to categories of vertical agreements and concerted practices in the motor vehicle sector ;(Polish Act - Regulation of the Council of Ministers of 28 January 2003 on the exemption of vertical agreements in the motor vehicle sector from the prohibition of competition restricting agreements (O.J. No. 38, item 329));
- imposing financial penalties due to infringement of competition protection regulations. It refers, in particular, to differentiating the sentencing of penalties depending on the type of violation (e.g. horizontal and vertical agreements as well as abuse of dominant position and taking into consideration mitigating and aggravating circumstances.
- economic aspects of carrying out anti-trust proceedings: quantitative methods of defining the relevant markets, putting into practice SSNIP (small yet significant and non-transitory increase in price) tests, analysis of costs in respect of entrepreneur’s imposing predatory pricing or predatory pricing strategies which are to rule out other competitors of the market, criteria of regarding prices as excessively expensive or unfair, economic methods of entrepreneur’s costs evaluation when regarding them as excessively expensive. Case studies analysis. Examples of resolutions of proceedings carried out by the European Commission as well as jurisprudence of The Court of First Instance and the European Court of Justice covering the subject.
- trainings or workshops referring to application of Council Regulation (EC) No 139/2004 of 20 January 2004 of the control of concentrations between undertakings (the EC Merger Regulation)
- trainings or workshops should focus on methodology of verification considering whether the performed notification of concentration intention refers to the EU or national level.

EXPERTS’ PROFILE
Profile of Project Leader - Member State’s Coordinator of the twinning light high level civil servant from MS

- experience in managing of international projects (experience in managing Phare projects will be seen as an advantage)
- experience in managing projects of comparable technical difficulty
- good command of English

Profile of Short-Term Experts:

Short-Term Expert no. 1
- practical knowledge of European procedures (practical experience in working with procedures applied by the Commission and Council in the scope of cooperation with MS, including different kind of working groups and their roles in European Commission and European Council)
- professional experience in consumer protection authorities or European institutions
- relevant academic qualification in the professional area related to this project (preferable diploma in law, economics or administration)
- good command of English

Short-Term Expert no. 2:
- excellent knowledge on the EU consumer legislation and the adoption of the acquis in one or more Member States
- relevant academic qualification in the professional area related to this project (preferable diploma in law, economics or administration)
- good command of English

Short-Term Expert no. 3:
- practical knowledge of European competition procedures
- professional experience in competition protection authorities or European competition institutions
- relevant academic qualification in the professional area related to this project (preferable diploma in law, economics or administration)
- good command of English

Short-Term Expert no. 4:
- excellent knowledge on the EU competition law and the adoption of the acquis in one or more Member States
- professional experience in competition protection authorities or European competition institutions
- relevant academic qualification in the professional area related to this project (preferable diploma in law, economics or administration)
- good command of English

The envisaged budget will be used for the short-term expert missions and related costs, as well as for training materials and publication (not specified in details below).

Approx. number of STEs days for consumer part:

45 days x 895 € = 40 270 €
30 days x 1020 € = 30 600 €
Flight costs – ca. 20 x 1200 € = 24 000 €

Approx. number of STEs days for competition part:
40 days x 895 € = 35 800 €
30 days x 1020 € = 30 600 €

Flight costs – ca. 30 x 1200 € = 36 000 €
TOTAL (approx): 197 270 €

Remaining part of budget – 22 730 € - will be focused of training materials, cost of publication and translation/interpretation costs.

Co-financing will cover the organisational costs of training (most of training and expert’s missions will take place in the OCCP premises).

The OCCP, as previous practice in the TWL project proved, will assure the necessary support for twinning partner, which will cover designation of official who will act as day-to-day counterpart, and who will be responsible for coordination of all required OCCP administrative and internal assistance in organizing of TWL activities.

3.4.2. Contract 2 Technical Assistance 1 – RESEARCHES - 0,2 M€

There is a constant need in Poland to conduct complex research activities in order to achieve maximum effectiveness of OCCP planned activities throughout the period covered by this project and in the future. The objectively verified background for governmental activities allows for implementation of action which are directly needed by consumers and requested by entrepreneurs.

Part 1 - sociological researches on consumer attitudes (envisaged scope)

- Diagnosis of current expectations concerning the central administration institutions handling by law the protection of collective consumers’ interests and elements of the OCCP perception research. The purpose of the research is to obtain information to adapt as the OCCP activities in order to strengthen consumers' activeness in a skilful and effective claims pursuit.
- Analysis of current level of consumer capability and constraints that hinder consumers the secure participation in the market. The research will regard the knowledge of the OCCP educational actions as an indicator influencing the awareness and capability level among Polish consumers.

Approx. net budget breakdown of one research

<table>
<thead>
<tr>
<th></th>
<th>Key expert (opinion poll)</th>
<th>35 days</th>
<th>1 100,00 PLN</th>
<th>Total 38 500,00</th>
<th>Total  9 164,70 €</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Key expert (opinion poll)</td>
<td>35 days</td>
<td>1 100,00 PLN</td>
<td>Total 38 500,00</td>
<td>Total  9 164,70 €</td>
</tr>
<tr>
<td>2</td>
<td>Research expert</td>
<td>30 days</td>
<td>900,00 PLN</td>
<td>Total 27 000,00</td>
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<tr>
<td>3</td>
<td>Questionnaires</td>
<td>1 000 pcs</td>
<td>5,00 PLN</td>
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<td>Total 1 235,46 €</td>
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<tr>
<td>4</td>
<td>Pollsters</td>
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<td>410,00 PLN</td>
<td>Total 41 000,00</td>
<td>Total 10 131,46 €</td>
</tr>
<tr>
<td>5</td>
<td>Organizational costs</td>
<td>1 days</td>
<td>10 000,00 PLN</td>
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<tr>
<td>6</td>
<td>Supporting staff</td>
<td>40 days</td>
<td>165,00 PLN</td>
<td>Total 6 600,00</td>
<td>Total 1 571,09 €</td>
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</tbody>
</table>
Part 2 - Legal and economic competition aspects – knowledge of competition protection law among Polish entrepreneurs accompanied by elements of OCCP position as the antimonopoly authority.

a. objective
The research is aimed for diagnosing the level and type of changes within entrepreneurs’ behaviours in the light of judicial and economic aspects of competition during the first few years after the EU accession and functioning within the Single Market, and in connection with activities enhancing competition law undertaken by the OCCP.

Information obtained from the research will provide guidelines of the OCCP effectiveness of educational and informative actions in the field of promoting competition law and marker entrepreneurs’ behaviours compliant with the antitrust law.

The goal of the research is to attain information which includes:
1. company economic compatibility, assessment of a company extent and direct competitiveness;
2. knowledge of competition law in Poland;
3. familiarity with competition authorities in Poland; Detailed questions concerning the OCCP capacities and its informative actions;
4. referring entrepreneurs to sources of information connected with competition protection; informative expectations;
5. major constraints perceived by entrepreneurs which hinder both the competition development in Poland and the individual entrepreneur’s company.

b. Methodology
The survey will be carried out by direct questionnaire interview basing on a random sample of entrepreneurs N=1200. Survey participants will include management representatives or owners/co-owners of companies drawn to participate in it.

Approx. budget breakdown

<table>
<thead>
<tr>
<th></th>
<th>Description</th>
<th>Days</th>
<th>Amount (PLN)</th>
<th>Amount (€)</th>
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</tr>
<tr>
<td>2</td>
<td>Research expert</td>
<td>30</td>
<td>900,00</td>
<td>27 000,00</td>
</tr>
<tr>
<td>3</td>
<td>Questionnaires</td>
<td>1 q200 pcs</td>
<td>5</td>
<td>6 000,00</td>
</tr>
<tr>
<td>4</td>
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<td>5</td>
<td>Organizational costs</td>
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<td>3 570,66</td>
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<td>6</td>
<td>Supporting staff</td>
<td>50</td>
<td>165,00</td>
<td>1 963,86</td>
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</tbody>
</table>

\[
\text{148 750,00 PLN} = 35 409,08 \text{ €}
\]

Above research – net value 35 500 € (43 310 € gross value)
Additionally, 1 ad hoc survey calculated as above should be envisaged, in order to allow the OCCP to answer the most current market situation and consumer attitudes in the time of project implementation and preparation of tender documentation – **envisaged to be incorporated into the a/m survey.**

Necessary for both parts reserve 20% of total gross value - for unexpected prices and exchange rate changes – 33 000 €

**Both parts envisaged management costs (project leaders) – 10 000 €**

**Costs of all reports preparation – 10 000 €**

**TOTAL Contract 2 gross value– 220 000 € (TF 200 000 € + 20 000 € national co-financing)**

The final number of surveys and their probe structure concerning the participation of particular types of research units and its territorial layout, will be designed in the course of preparation of tender documents, accordingly to the up-to-date situation, however at least 3 complex sociological researches will be provided.

**Envisaged key expert profiles (to be profiled for each part):**

<table>
<thead>
<tr>
<th>Project Leader</th>
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<tbody>
<tr>
<td>Qualifications</td>
<td></td>
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<tr>
<td>University degree</td>
<td></td>
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<tr>
<td>Professional experience</td>
<td></td>
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<tr>
<td>Min. 7 years of general professional experience</td>
<td></td>
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<tr>
<td>Min. 5 years of experience in project management - projects similar to the scope of contract 2 (sociological, projects, opinion pools projects etc.)</td>
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</tbody>
</table>

| Key expert (opinion poll)      |                                     |
| Qualifications                 |                                     |
| Phd in social sciences         |                                     |
| Member of ESOMAR (World Association of Opinion and Marketing Research Professionals) or other professional associations |                                     |
| Professional experience        |                                     |
| min. 10 years experience in analyzing of research results and writing conclusions and recommendations. |                                     |
| min. 10-year experience in elaborating, leading and evaluating of sociological research, using quantitative and qualitative statistical methods, |                                     |
| min. 10 year experience in sociological researches on the entrepreneurs or on consumer attitudes |                                     |

| Research expert                |                                     |
| Qualifications                 |                                     |
| University degree in sociology or psychology |                                     |
| Member of ESOMAR (World Association of Opinion and Marketing Research Professionals) or other professional associations |                                     |
Professional experience

| min. 5 years experience in analyzing of research results and writing conclusions and recommendations. |
| min. 5 years experience in elaborating and leading of sociological research, using qualitative statistical methods, |

3.4.3. Contract 3 Technical Assistance 2 – COMPETITION EXPERTISES - 0,16 M€

The contract nr 3 will be directly focused at the providing of the OCCP case handlers with detailed analyses of specific competition issues, which cause queries and require further external and independent analyses.

The following exemplary expertises shall be prepared within the scope of this Technical Assistance component:

- an expertise concerning “cartels in public procurement”. It should include issues referring to: different forms of bid-rigging, like: • Bid-suppression: where one or several competitors refrain from tendering or withdraw previous tenders so that a competitor’s tender will be accepted. • Complementary or cover bidding: competitors agree to submit tenders which are too high or which contain special conditions which will be unacceptable to the buyer. This method gives the appearance of genuine competition. • Bid rotation: competitors agree to take turns as to who will be best placed to win the tender i.e. the competitor whose turn it is to win puts in the lowest offer. • Sub-contracting: in exchange for not bidding or for submitting an obviously unacceptable bid, competitors agree to share amongst them the illegal gains, e.g. the award of a lucrative sub-contract for agreeing to participate in the collusive tendering scheme.

- an expertise concerning abusing of collective dominant position in the market, which refers either to entrepreneurs within one capital group or parallel entrepreneurs’ behaviours in oligopoly market. Prerequisites of regarding entrepreneurs’ activities as abusing of collective dominant position in the market or competition restricting agreements, including experiences of the European Commission and MS countries in the above mentioned issues.

- analysis of anti-competitive regulation in Poland (identification, responsibilities, advice on possible changes).

- analysis of merger conditional decisions – analysis of particular conditions and their efficiency

- analysis of prohibited transactions (mergers)

- analysis of state aid efficiency

The detailed subjects of particular expertises/analyses may change from above-mentioned accordingly to the binding situation and time-frame of designing of tender documents. At least 5 expertises/analyses must be prepared within the scope this contract.

None of a/m envisaged topics was covered by EU financial support and consequently the finally chosen topics will follow this rule.

Envisaged budget calculation (relevant for contractors from all EU MS)
Project leader 30 day 1 400,00 PLN 45000,00 PLN 10711,99 €
Experts – all expertises 400 day 1 200,00 PLN 480000,00 PLN 114261,23 €

Total net value 525 000,00 PLN 124973,22 €

Total gross value – 153 000 €.

The experts profile should focus on the advanced experience in competition and economy/law, specific economic aspects advisory experience as well as experience in the binding law analyses - relevant for the project.

3.5 Lessons learned:

With reference to Interim Evaluation No. R/PL/INT/02101, date: 24 June 2003 made by EMS Poland, the following conclusions and recommendations were considered in the process of project design:

- point 53, p. 12: “PL0004.03 and PL0102.05 should increase the provision of consumer protection however the capacity of the OCCP and associated institutions need to be further developed to provide effective consumer protection comparable with Member States.”
- point 81, p. 17: “The institutions with responsibility for market surveillance, generally, have been created more recently and are not as advanced as their conformity assessment counterparts. Nevertheless progress can be reported in this area also and, assuming institutional stability, governmental support and continued support and cooperation with MS institutions, the prospects for achieving and maintaining compliance with EU standards are good.”

On the basis of experience in all OCCP Phare and TF projects the current project is designed to avoid previous problems and obstacles, such as overestimation of twinning costs and actions becoming outdated due to long period between design and implementation.

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 project 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,

Experiences gathered in the course of realisation of project PL9905.04 State Aids Control and other OCCP projects as well as recommendations made by EMS are taken into consideration in current project – i.e. the budget calculation and number of activities reflect the real organisational possibilities and demands.

Bearing in mind above-mentioned recommendations and current state of play, the OCCP has decided to continue programming complex project in the field of competition and consumer protection, in order to meet the most required issues relevant for the whole OCCP and its cooperating stakeholders.

4. Institutional Framework

The Office of Competition and Consumer Protection is the main beneficiary of the project and will co-ordinate the project in its capacity of government competition and consumer
protection authority. The direct beneficiaries of the sociological research part of the project will be also consumers, entrepreneurs and media, who will be provided with objectively verified specific knowledge. Department of Foreign Assistance, Budget and Administration in the OCCP is responsible for the co-ordination of the entire project, although it will be supported by the enforcement departments: the Consumer Policy Department, the Communication Department, the Department of Competition Protection, the Department of Market Analyses as well as by OCCP’s branch offices – which will be the direct beneficiaries of training and expertise provided within the project. The implementation of the project will cause no institutional changes.

5. Detailed Budget

<table>
<thead>
<tr>
<th>€M</th>
<th>Transition Facility support</th>
<th>Co-financing</th>
<th>Total cost (TF plus co-financing)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Investment Support</td>
<td>Institution Building</td>
<td>Total Transition Facility (=I+1B)</td>
</tr>
<tr>
<td>Contract 1 Twinning light</td>
<td>0</td>
<td>0.22</td>
<td>0.22</td>
</tr>
<tr>
<td>Contract 2 TA 1</td>
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<tr>
<td>Contract 3 TA 2</td>
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<tr>
<td>Total</td>
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<td>0.56</td>
<td>0.56</td>
</tr>
</tbody>
</table>

(*) contributions form National, Regional, Local, Municipal authorities, FIIs loans to public entities, funds from public enterprises

(**) private funds, FIIs loans to private entities

The amounts for national co-financing indicated in the table correspond to cash co-financing, unless otherwise stated. Contributions from the Polish administration for effective implementation of the twinning light/TA may be further detailed in the twinning contract/Terms of references. Unless otherwise indicated joint cofinancing is provided.

VAT does not constitute eligible expenditure except where it is genuinely and definitely borne by the final beneficiary. VAT which is considered recoverable, by whatever means, cannot be considered eligible, even if it is not actually recovered by the final beneficiary or individual recipient.

In case of parallel cofinancing, the following activities will be financed from the parallel cofinancing provision in the budget table: twinning light – cost of participation in the training, cost of organising of the seminars etc, required for effective and efficient absorption of Transition Facility assistance.
According to the joint financing procedure, the total cost of contracts 2 (0.22 MEUR) and 3 (0.16 MEUR) will be financed with both Transition Facility funds and Polish funds, in proportions corresponding with contributions declared in the budget table.

6. Implementation Arrangements

There will be a Project Steering Committee (PSC) established in order to speed up the implementation process of the given project components in the first months after Financial Decision for Transition Facility 2006 is taken. The structure of the Committee will be working as an advisory and monitoring body until particular components are contracted and thus where appropriate may be replaced by the Twinning Steering Committee as well as Steering Committees for TA components independently.

The participants of the Project Steering Committee will be representatives of the following institutions: PAO, NAC, CFCU and beneficiary (SPO and contact person as indicated in the fiche). It is also recommended to invite representatives of NAO services while the issues of financial management flow are to be comprehensibly discussed. The Project Steering Committee will meet every quarter starting from the date of signing the Financial Decision and will concentrate on discussing the problem occurred at the beginning phase of project implementation as well as on defining possible solutions and corrective measures. The PAO representative will organize and chair the PSC meetings.

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**: Izabella Nowakowska, 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 persons in the OCCP:**

Mr Cezary Banasiński, President of the OCCP, SPO

Ms Magdalena Jaworska, Project Leader, acting Director General of the OCCP, 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

Ms Aleksandra Maćzyńska, MS Project Leader’s counterpart, Head of Unit, Department of Foreign Assistance, Budget and Administration, OCCP, phone: +48 22 55 60 167, fax: +48 22 827 08 43, e-mail: amaczynska@uokik.gov.pl

Administrative Office: Department for Institution Building Programmes, Office of the Committee for European Integration, Aleje Ujazdowskie 9, Warsaw, Phone: 48 22 455 52 15, Fax: 48 22 455 52 14

6.3. Non-standard aspects
n.a.

6.4. Contracts

**Contract 1 - Twinning light**
0.22 MEUR (TF) + 0.02 MEUR (parallel co-financing) = 0.24 MEUR gross value

**Contract 2 – TA 1 – sociological researches**
0.2 MEUR (TF) + 0.02 MEUR (joint co-financing) = 0.22 MEUR gross value

**Contract 3 – TA 2 – expertises**
0.14 MEUR (TF) + 0.02 MEUR (joint co-financing) = 0.16 MEUR gross value

7. Implementation Schedule

**Contract 1**
7.1 Commencement of contracting process: 2nd Q 2007
7.2. Start of project implementation (signature of contract): 2nd Q 2007
7.3. **Project completion: 1st Q 2008**

**Contract 2**
7.1 Commencement of contracting process: 2nd Q 2007
7.2. **Start of project implementation (signature of contract): 1st Q 2008**
7.3. **Project completion: 1st Q 2009**

**Contract 3**
7.1 Commencement of contracting process: 3rd Q 2007
7.2. **Start of project implementation (signature of contract): 2nd Q 2008**
7.3. **Project completion: 2nd Q 2009**

8. Sustainability

*Practical training courses 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.*

*The OCCP will try it’s best to keep the trained staff within the structure, i.a. by implementing more systematic salaries motivation system as well as by enhancing the scope of individual professional competences. Such approach, being implemented partially now, result in deeper involvement in Office’s life and in consequence contribute to significantly higher will to remain within the OCCP.*

9. Conditionality and sequencing
**Conditionality**

There are no legal or operational conditionalities for project start and operation (as competition policy and consumer protection actions are realised constantly), however before realization of the Technical Assistance contracts an assessment of the results of previous/ongoing projects must be done.

**Milestones and sequencing**

- Signing of the Commission Decision
- Preparation of relevant tender documentations for contracts and start of tender procedures
- Providing relevant training actions and materials according to the beneficiaries’ specific needs
- Providing relevant market research and expertises according to the beneficiary specific needs
- Approval of a project’s final report.
## LOGFRAME MATRIX:

### Programme name and number:
- Contracting period expires IV quarter 2008
- Disbursement period expires IV quarter 2009
- TOTAL BUDGET OF THE PROJECT 620 000 EUR
- Transition Facility Budget 560 000 EUR:

### Project:
**Competition and consumer protection policy**

<table>
<thead>
<tr>
<th>Overall objective</th>
<th>Objectively Verifiable Indicators</th>
<th>Sources of Verification</th>
</tr>
</thead>
<tbody>
<tr>
<td>• ensuring the same high level of consumer and competition protection activities in Poland as in the EU-15</td>
<td>personnel of OCCP (in total: c.a. 30 persons) provided with further know-how on their particular competences referring to consumer protection practice by the end of the project</td>
<td>OCCP internal statistics/annual reports</td>
</tr>
<tr>
<td></td>
<td>competition case handlers of the OCCP headquarters and branch offices (c.a. 30) provided with most recent advice and training.</td>
<td>Court internal statistics – number of cases won</td>
</tr>
<tr>
<td></td>
<td>updated information actions for market players assured</td>
<td></td>
</tr>
</tbody>
</table>

### Project purpose
- Providing the competition and consumer protection professionals with tailored training and expertise on detailed aspects of application of European law and procedures (practise and expertises) 
- Providing entrepreneurs with necessary knowledge on consumer rights and business responsibilities within the Internal Market
- Deepening the awareness of consumers and business on the Internal Market by providing within the project objectively verified information (researches) both consumer and competition ones

<table>
<thead>
<tr>
<th>General remark: please note that personnel participates in training sessions repeatedly</th>
<th>Objectively Verifiable Indicators</th>
<th>Sources of Verification</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>case handlers of the OCCP headquarters and branch offices (c.a. 60) trained by the end of the project in envisaged scope</td>
<td>OCCP internal statistics</td>
</tr>
<tr>
<td></td>
<td>assuring the access to credible information for case handling – at least 5 expertises for the OCCP provided</td>
<td>Reports of experts</td>
</tr>
<tr>
<td></td>
<td>c.a. 400 entrepreneurs trained;</td>
<td>Media – paper and electronic (analyses of media done by OCCP – in the aspect of scope of interest of competition and consumer issues, Office’s and its competences perception and recognition)</td>
</tr>
<tr>
<td></td>
<td>Feedback from entrepreneurs</td>
<td></td>
</tr>
</tbody>
</table>

### Assumptions
- Stable state of human resources (trained staff remains within structures of the OCCP)
- Media interest in promotion of competition and consumer protection culture

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**Competition and consumer protection policy**

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19
<table>
<thead>
<tr>
<th>Contract 1 – Twinning light</th>
<th>Recommendations and conclusions of expertises and analyses introduced in the OCCP consumer/competition policy strategy</th>
</tr>
</thead>
<tbody>
<tr>
<td>30 persons from the OCCP (especially newly employed) are provided with practical knowledge on European procedures;</td>
<td>training for c.a. 60 employees from OCCP is assured - on specific consumer issues such as tendencies of the new jurisdiction of the ECJ or on specific competition issues such as economic aspects of carrying out anti-trust proceedings</td>
</tr>
<tr>
<td>the OCCP personnel (esp. Consumer Policy Department and branch offices) provided with practical experiences from other MS on tendencies of the new jurisdiction of the ECJ</td>
<td>complex publication published - containing review of jurisdiction made by twinning experts and resulting from the training conducted - mostly asked queries (paper publication, max 200 pages in Polish language)</td>
</tr>
<tr>
<td>OCCP competition personnel – at least 30 persons (esp. enforcement Departments and branch offices) provided with practical experiences from other MS</td>
<td>expertises and analyses elaborated within the twinning giving to OCCP the tool showing the efficiency of Office’s activity already undertook and analysing present situation on the market in the scope of consumer protection and consumer safety (at least 1 expert on one analysis)</td>
</tr>
<tr>
<td>complex publication containing review of jurisdiction, resulting from the training published</td>
<td>c.a. 8-10 training sessions for entrepreneurs conducted (c.a. 400 persons; training on binding regulations, most important consumer problems related to business responsibilities);</td>
</tr>
<tr>
<td>expertises and analyses monitoring efficiency of OCCP’s actions undertook and analysing present situation on the market in the scope of consumer protection and consumer safety elaborated and provided to the Beneficiary;</td>
<td>at least 3 complex sociological researches conducted by the end of the project and their results made available to public via OCCP</td>
</tr>
<tr>
<td>knowledge of business representatives improved (c.a. 400 persons; special training on binding regulations, most important consumer problems related to business responsibilities provided);</td>
<td>Media – paper and electronic (analyses of media done by OCCP – in the aspect of scope of interest of competition issues, Office’s and its competences perception and recognition)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Sources of Verification</th>
</tr>
</thead>
<tbody>
<tr>
<td>Issued publication and training materials</td>
</tr>
<tr>
<td>Studies and analyses</td>
</tr>
<tr>
<td>Lists of participants</td>
</tr>
<tr>
<td>Training evaluation questioners</td>
</tr>
<tr>
<td>OCCP internal statistics</td>
</tr>
<tr>
<td>Media – paper and electronic (analyses of media done by OCCP – in the aspect of scope of interest of competition issues, Office’s and its competences perception and recognition)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Assumptions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stable state of human resources (trained staff remains within structures of the OCCP)</td>
</tr>
<tr>
<td>Necessary budget sources/reserves of national public financial resources accessible - for co-financing purpose.</td>
</tr>
<tr>
<td>Media interest in promotion of competition and consumer culture</td>
</tr>
</tbody>
</table>
TA 1 – sociological researches on specific topics
- at least 2 researches on consumer attitudes done
- information to adapt as the OCCP activities in order to strengthen consumers' activeness in a skilful and effective claims pursuit obtained.
- an indicator influencing the awareness and capability level among Polish consumers provided.
- One research completed and a/an report/analysis concerning the knowledge of competition protection policy among entrepreneurs operating throughout the country provided.

TA 2 – competition expertises/analyses
- required (at least 5) market analyses/expertises provided – resulting in strengthening the OCCP knowledge (case-handlers) and capacities

<table>
<thead>
<tr>
<th>Activities</th>
<th>Means</th>
<th>Sources of Verification</th>
<th>Assumptions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Twinning light – tailored training and experts assistance</td>
<td>Twinning light contract with min.. 10 STE signed TA contracts signed</td>
<td>Financial documentation Monitoring progress reports Feedback from entrepreneurs’ training evaluation results Numbers of researches’ final reports provided Number of expertises accepted</td>
<td>Necessary budget sources/reserves of national public financial resources accessible - for co-financing purpose. Necessary OCCP input provided – eg. day-to-day counterpart for STEs, office space for coming STEs</td>
</tr>
<tr>
<td>Specific training courses for the OCCP representatives on the following subjects: Consumer protection:</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>- practical training on procedures applied by the Commission and Council in the scope of cooperation with MS, including different kind of working groups and their roles in European Commission and European Council – in the fields of OCCP competences related to consumer policy ,</td>
<td>c.a. 8-10 training sessions for entrepreneurs conducted by the end of the project</td>
<td></td>
<td></td>
</tr>
<tr>
<td>- practical training on tendency of the new jurisdiction of the European Court of Justice in relation to consumer law,</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>- practical training on different procedures before the European Court of Justice - practical aspects,</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>The paper publication summing-up the a/m part of the project (jurisdiction, procedures) will be also</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Analyses and expertise on consumer issues proposed topics i.a.:
- on consumer protection problems during the period of EURO currency implementation;
- on consumer protection rules enhancing competition by improving market transparency, leading to more efficient consumer choices;

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

- Technical assistance 2 – sociological researches
  Part 1 - sociological researches on consumer attitudes
  Part 2 - Legal and economic competition aspects – knowledge of competition protection law among Polish entrepreneurs accompanied by elements of OCCP position as the antimonopoly authority.

- Technical assistance 3 - expertises
  The following exemplary expertises shall be prepared within the scope of this Technical Assistance component:
  - an expertise concerning “cartels in public procurement”.
  - an expertise concerning abusing of collective dominant position in the market, which refers either to entrepreneurs within one capital group or parallel entrepreneurs’ behaviours in oligopoly market.
  - analysis of anti-competitive regulation in execution of at least 3 professional sociological researches by the end of the project
  elaboration of at least 5 analyses by the end of the project (the number of experts working on analyses is unpredictable)
Poland (identification, responsibilities, advice on possible changes).
- analysis of merger conditional decisions – analysis of particular conditions and their efficiency
- analysis of prohibited transactions (mergers)
- analysis of state aid efficiency

Preconditions
Before realization of the Technical Assistance respective TA contracts an assessment of the results of previous/on-going projects must be done.

ANNEX 2-3 Implementation, contracting and disbursement schedules

<table>
<thead>
<tr>
<th>PLANNED</th>
<th>Date of drafting: 10.2005</th>
<th>Planning period: 01.2007-2009</th>
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</thead>
<tbody>
<tr>
<td>I ’07</td>
<td>II ’07</td>
<td>III ’07</td>
</tr>
<tr>
<td>I</td>
<td>II</td>
<td>III</td>
</tr>
</tbody>
</table>

Contract 1
Implementation schedule | D | C | I | I | I |

Budget Allocation Cost Estimate in MEUR
<table>
<thead>
<tr>
<th>Contracting schedule</th>
<th>Disbursement schedule</th>
<th></th>
<th></th>
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</tbody>
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**Contract 2**

<table>
<thead>
<tr>
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<th>Contracting schedule</th>
<th>Disbursement schedule</th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>D</td>
<td>D</td>
<td>D</td>
<td>C/I</td>
<td>I</td>
<td>I</td>
<td>I</td>
<td>I</td>
<td>I</td>
</tr>
<tr>
<td></td>
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</tbody>
</table>

**Contract 3**

<table>
<thead>
<tr>
<th>Implementation schedule</th>
<th>Contracting schedule</th>
<th>Disbursement schedule</th>
<th></th>
<th></th>
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<th></th>
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</tr>
</thead>
<tbody>
<tr>
<td>D</td>
<td>D</td>
<td>D</td>
<td>C/I</td>
<td>I</td>
<td>I</td>
<td>I</td>
<td>I</td>
<td>I</td>
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<td></td>
<td></td>
<td>0.14</td>
<td></td>
</tr>
</tbody>
</table>

**Legend:**

D = design of contract and tendering;
C = signature of contract
I = contract implementation and payment