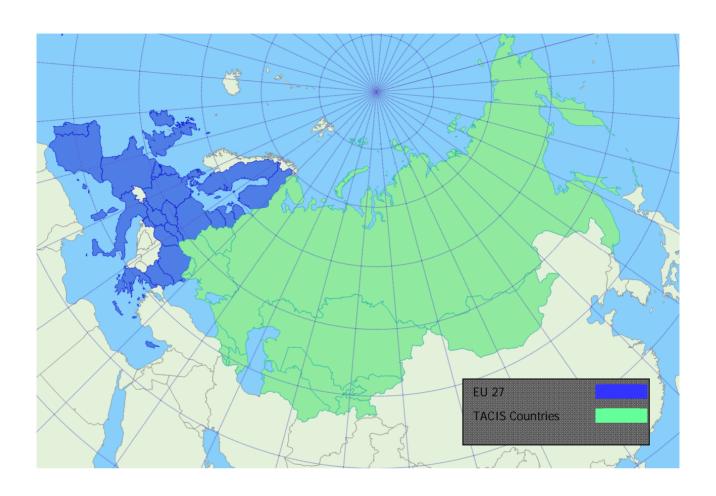
# The European Commission's Tacis Programme 1991 – 2006 - A Success Story -



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#### 1. From "Big Unknown" to European Neighbourhood and Strategic Partnership

"Dad, what is your next assignment and where will it be?"

"I am taking up a temporary assignment in Kazakhstan"

"Kazakhstan - where is this?"

"It's a newly independent Republic of the former Soviet Union"

"You mean Russia, eh?"

"No, it is in Central Asia. Its capital is Almaty"

"It must be a very small country, since I have never heard about it".

" No dear, it is huge.

Take the map of Europe and Asia; here, this is Kazakhstan; put your right hand on the country. You see, it roughly covers the area of Kazakhstan.

Now put your left hand on the (then 12) countries of the European Union..."

"Oops - it is almost the same size...!"

A 19 year old high school graduate asking his father working for Tacis in 1993

The above scene describes the start of the EC's Tacis Programme possibly better than any formal analysis.

In 1990, the Soviet Union started to break up, and its former constituent republics declared independence one by one. By the end of 1991, it ceased to exist leaving an enormous political, economic and social vacuum behind, which urged for assistance in all respects.

Given the speed of these developments and the obvious need for support, still in 1991 the European Union started its Tacis- Programme. <sup>1</sup>

It started in a rush: unexpectedly and with virtually no time to prepare. There was little to no information, no traditional ties which could be activated. Tacis was addressed to the newly emerging independent states, mainly aiming at enhancing their transition process. At that time, however, these countries had unknown political structures, institutions and potential partners. In addition, there was (and still is...) a constantly changing institutional environment, which makes long-term planning a sometimes tedious effort.

From the European Commission's side, initially only one EC Delegation was in place (Moscow). Others followed until 1994 (Kiev for Eastern Europe, Tbilisi for the Caucasus and Almaty for Central Asia), but at least the latter ones had to start from zero and were confronted with the above-mentioned difficulties and uncertainties. Still today, no fully fledged Delegations exist e.g. in Uzbekistan or Turkmenistan. Progress was made in the neighbouring countries, where Belarus is the last remaining country without an EC Delegation, which, however, will be opened in 2008.

The European Commission's Tacis Programme had to be built up from scratch. Internally, no adequate procedures, no adequate rules and regulations, no common corporate culture were in place. Instead, a small nucleus of pioneer staff with different backgrounds was recruited from various DGs. This new staff – at the beginning still mostly unfamiliar with the region to deal with had to go through a formidable learning process. In addition, they were confronted with an unexpected challenge:

- on the one side, an immediate need for assistance: economic, social, administrative (even food aid),
- on the other side, quick "political" promises from western diplomats to help "fast and un-bureaucratically"
- ... while obviously correct spending and often complicated procedures had to be respected; And long-term sustainability was an enormous challenge from the beginning.

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<sup>&</sup>lt;sup>1</sup> Tacis = Technical Assistance to the Commonwealth of Independent States

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<u>Today (2007)</u>, Russia and the "newly independent states" are well known. They are recognized to be *independent* and going their own and different development ways. Diplomatic ties are established; In most cases PCA's are signed (Partnership and Cooperation Agreements <sup>2</sup>); Numerous governmental and non-governmental "twinning partnerships" are initiated and well established.

Economic ties are strengthened, and the EU is becoming the main economic partner of most "CIS-countries":

Russia and the EU are building a "Strategic Partnership". The Baltic countries are already member states of the EU; And others (e.g. Ukraine, South Caucasus) are clearly voicing their European ambitions.

It is an undisputed fact that the EC's Tacis Programme contributed to a great extent to this development—in only 15 years - which is remarkable considering the level at which it once started.

<sup>&</sup>lt;sup>2</sup> PCA's are legal frameworks, based on the respect of democratic principles and human rights, setting out the political, economic and trade relationship between the EU and its partner countries.

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### 2. Developing a common language

#### Initial Misunderstandings

<u>The contractor</u>: Hi, we are from XY consultancy company, we come to start the new Technical Assistance (TA) project of the European Commission with you.

<u>Partner</u>: European Commission? Excellent! Technical Assistance? Super! You are coming at the right time. What equipment are you bringing to us?

- C: Equipment...?... Eh, there is no equipment in our contract.
- **P**: No equipment? But what else are you bringing?
- **C**: We provide technical assistance to your administration in order to perform better, reduce costs and administrative barriers and streamline bureaucratic procedures.
- P: So no equipment? Only advise on how to reduce costs, or staff; maybe even my position?
- C: Exactly! Haven't you been informed by Moscow, or seen the Financing Agreement (FA)?
- **P**: (reading the FA, probably for the first time...) Ok, I understand, no equipment. But when can we dispose of the <u>money?</u>
- **C**: Money...? There is no money foreseen for you. Instead, we expect your administration to provide us with offices, support staff, furniture, etc.
- P: No money? But it's written here: "EC contribution is 3.2 million Euros!"
- **C**: The money mentioned in this Financing Agreement is <u>for you</u>, however, it also contains our salaries, travel, cars, housing allowances, etc. I am afraid, there is no cash money left, which we can hand over to you.
- **P**: Oops...!

1995: A contractor showing up at an Oblast Administration ("Partner") in the Urals, Russia.

The term <u>"technical assistance"</u> in Russia usually means <u>"equipment"</u>;

And if a budget is mentioned, then this is available for implementation

The above example illustrates, what kind of heritage the Tacis Programme had to face. In more than 40 years of development or economic cooperation, the EU had developed a common communication line; so initially, one could hardly imagine that in the "Tacis countries" the logic and vocabulary may be somewhat different. Other terms and concepts also added to the challenges Tacis pioneers were confronted with. For us, they seem to be common and clear; however, some of them are worth further contemplation:

#### EC assistance was not always uniform

Recipient countries had expected that the EU "speaks with one voice".

Instead, at the beginning, there was the risk that contractors from different EU countries caused confusion when they implemented Tacis projects in their own "national way" rather than looking for locally adapted solutions; their nationality frequently determined the administrative or institutional system they promoted <sup>3</sup>.

The name: "Tacis"

Also, the name "Tacis" (Technical Assistance to the Commonwealth of Independent States) which was given to this programme soon stopped to reflect the political reality of the region. CIS countries never became a Commonwealth, or established an international legal body<sup>4</sup>. The Baltic States were not part of it. And Mongolia – also a Tacis beneficiary until 2003 – had always been independent from Russia.

#### "Re-installation of Democracy"

Even the notion of "*re-installation*" could be considered problematic in a region where no citizen had any experience of democracy - that citizens have choices or that democracy not only means *rights* but also *responsibilities*.

Such dramatic changes need time and cannot be expected to be completed within e.g. a five-year-period.

<sup>&</sup>lt;sup>3</sup> For example the role of Chambers of Commerce and Industry in e.g. Germany or the UK is quite different, but both have sometimes been promoted in parallel.

<sup>&</sup>lt;sup>4</sup> The "CIS" was created in 1991 (Minsk agreement) to ensure an easier transition to independence for ex-Soviet republics and develop cooperation in the territory of the ex-USSR.

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#### "Market Economy"

Similarly, introducing a "market economy" was no easy task. Government(s) centrally planned the economy and determined products, recipients and "markets". Individual conglomerates were not used to a pro-active policy. As a consequence of the absence of a "central plan", many lost their traditional 'ties' and had to close down.

Some "smart" individuals quickly learned how to benefit from the existing legal vacuum and interpreted the term "market economy" in their way. They mixed "market economy" with "Manchester capitalism". The concept of "social market economy" was unknown. Some of the recent drawbacks, e.g. in Russia, have to be seen also in this context.

#### "Regional Integration"

As for the aim of "Regional Integration", we should not forget: the former Soviet Union was an integrated system; and the EC even assisted the new states to become more independent (in other words: to "disintegrate"). Many cross-border programmes or customs projects have to be seen in this context. In Soviet times, they were not needed.

After the Soviet break-up, traditional regional conflicts re-emerged, e.g. in the Caucasus and in Central Asia. The newly independent states *wanted* to demonstrate their independence. It was (and still is...) a long and mutual learning process that despite national independence there are aspects of regional concern requiring regional cooperation. In this new context, Tacis Regional Programmes often help *re-installing* what was installed and functioning before.

#### "Orientation towards the West"

All countries of the former Soviet Union were focused on Russia and Moscow. With the new independence, this focus was interrupted. The Tacis Programme has actively supported a re-orientation towards the European Union – for example with sector programmes like TRACECA <sup>5</sup> or INOGATE <sup>6</sup>. Other institutions did the same, for example, even the fact that Kazakhstan is member of the European Football Association UEFA underlines this orientation.

It should not be jeopardized.

<sup>&</sup>lt;sup>5</sup> TRACECA. the Transport Corridor Europe – Caucasus – Asia (or the "New Silk Road").

<sup>&</sup>lt;sup>6</sup> INOGATE, the Interstate Oil and Gas Transport to Europe

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#### 3. Tacis – a learning process: from "Demand-driven" to "Dialogue-driven" Cooperation

The Tacis programme started in 1991 and was replaced in 2007 by the "European Neighbourhood and Partnership Instrument - ENPI". The original Tacis objectives were "to support the process of <u>transition to market economies</u> and <u>democratic societies</u> in the countries of Eastern Europe, South Caucasus and Central Asia."

During these 15 years, the concept and management of this policy underwent significant changes in order to flexibly respond to a changing environment and needs. Basically, we can distinguish two main phases:

#### "Demand driven" (1991 - 1999)

In the first 8 years, Tacis was rather demand-driven: Requests from (still relatively unknown) CIS Ministries were received, assessed on the basis of often scarcely existing information and responded to. Tacis simply did not have an alternative then − except causing considerable delays in implementation. Assistance was thus provided mainly in form of <u>single small-scale projects</u>. Approximately € 4.2 billion were committed to funding them during this time.

Even though this initial concept was basically a *project* support, it always already included various <u>sectoral components</u>. One of the most important is for example the development of the *Private sector*. It remains among the key objectives of the TACIS Programme until today.

With a centralised programme and project management in Brussels, relatively few alternative programmes could be proposed. This becoming more and more obvious, the Tacis Programme reacted accordingly.

#### "Dialogue-driven" (2000 - 2006)

In January 2000, the EC reacted with a new Council Regulation (No 99/2000) taking the improved relations and developments into account. This regulation opened a new phase of co-operation between the European Union and the "Tacis partner countries". It is based on an understanding that co-operation is a reciprocal process, moving away from a rather "demand-driven" approach to one which focuses more on a *dialogue*. It also recognises the importance of the partner states' commitment when allocating the resources.

With a continuously improving understanding of national situations, the EC itself was better qualified to make its own proposals. As a result, EC priorities were equally discussed as were national proposals and priorities. The principle of "national ownership" emerged and the EC understood that without such ownership, the impact of their actions would remain limited.

#### **De-concentration of Services**

In addition, to adapt and improve Tacis and development cooperation in general, the EC reacted with deconcentration of its management towards the <u>EC Delegations</u>, with improved project identification, planning and supervision. <sup>7</sup>Thanks to de-concentration, a much better understanding of national needs emerged.

Since January 2001, the <u>Directorate-General for External Relations</u> is responsible for the political direction (e.g. negotiating the Partnership and Co-operation Agreements) and for multi-annual programming (Indicative Programmes), while the <u>EuropeAid Co-operation Office</u> (established in 2001) is responsible for managing the project cycle and annual programmes.

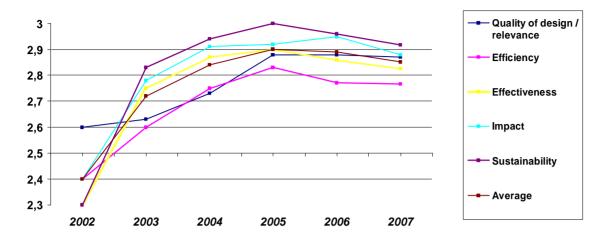
<sup>&</sup>lt;sup>7</sup> According to the Communication on the reform of the management of external assistance of the 16th of May 2000, "anything that can be better managed and decided on the spot, close to what is happening on the ground, should not be managed or decided in Brussels".

The objective is to de-concentrate the responsibility of the management of external assistance towards Delegations.

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The success of de-concentration is illustrated by this diagram:

Table 1: Average scores for main ROM monitoring criteria 2002 – 2007 8



Note: A = very good (4); B = good (3); C = problems (2); D = serious deficiencies (1)

Without going into the details here, the above chart of Tacis performance during the last five years shows a clear upwards trend of the overall scores in all five evaluation criteria and a stabilisation on a very high level. It can be seen as an indicator that de-concentration and devolution contributed to an improved performance.

It also indicates a steady evolution in the implementation of EU-funded programmes, greater experience on the part of the EC Delegations in administering them, improved performance of EC contractors and finally a heightened sense of ownership and commitment on the part of the project partners.

This general picture underlines the conclusion, that Tacis followed an internal learning process making it an effective and successful programme with sustainable results over the years.

 $<sup>^{\</sup>it 8}$  Source: ROM – Result oriented Monitoring Programme fort he above years

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#### 4. <u>Sector</u> Focus and increased Impact

Already after the first two years of "emergency assistance" (around 1993), the Tacis Programme has concentrated its efforts on "strategic sectors and issues", for example the Nuclear Safety sector, TRACECA (transport) or INOGATE (pipelines).

For other sectors, their names and titles may have changed over time<sup>9</sup>, but it was obvious from the beginning that a tangible and sustainable impact could only be achieved if concentrating on fewer yet strategic sectors.

#### Fewer areas of cooperation – increased impact

From 2002 - 2005, for example, the EC has concentrated its support on six "Priority Areas":

- Support for institutional, legal and administrative reform.
- Support for the private sector and assistance for economic development.
- Support for addressing the social consequences of transition.
- · Development of infrastructure networks.
- Promotion of environmental protection and management of natural resources.
- Nuclear safety.

While "technical" sectors like "Transport" or "Pipelines" are basically defined by the names, sectors like 'Private Sector' or 'Drug trafficking' for example are more complex hence urging for a more comprehensive approach. A sector programme for the "Private Sector" for example may include support to industry, trade & export, certification, banking, institutional strengthening, legal and administrative framework and the like

The EC's Tacis Programme in most countries followed this broad strategy. Even though the early Tacis support cannot be regarded as a full-fledged "Sector Policy Support Programme – SPSP" in its present form, Tacis already anticipated this development with its approach to focus on sectors rather than on single projects already at a relatively early moment of cooperation.

Starting around 2000, also the entire donor community has been shifting their priorities towards sector and budget support. This process necessitated the need to harmonise the understanding among donors of 'what is a sector?' The result is that from 2006, also the EC uses the commonly accepted definitions of the DAC-code<sup>10</sup> grouped into ODA sectors<sup>11</sup>.

The shift to sector programme support also signified an increasing use of the partner countries' own resources and systems (assistance channelled through the national treasuries, thus increasing *national ownership*).

Furthermore, the areas where Tacis funding is used are designed to complement each other, and each national or multi-country programme focuses on no more than three of the above-mentioned fields (plus nuclear safety, where appropriate), so that each can be most effective.

Together with the above-mentioned PCAs in place, Tacis has become an increasingly strategic instrument. The overall total of  $\underline{\in}$  7,3 billion for 15 years is substantial but may still be considered limited given the size of the challenge to tackle. But Tacis has contributed to fundamental change and visible development.

The Tacis Programme planted a seed which often grew to sustainable changes in society, economy and other priority sectors.

<sup>&</sup>lt;sup>9</sup> e.g. "Sectors", "Areas of Cooperation" or "Priority Areas"

<sup>&</sup>lt;sup>10</sup> DAC – Development Assistance Committee of the OECD

<sup>&</sup>lt;sup>11</sup> ODA – Official Development Assistance of the OECD

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#### 5. Monitoring Tacis Performance and Impact

During its 15 years of duration, Tacis has become a brand name for effective EU assistance.

This statement can be evidenced by the fact that Tacis was the first and only EC Programme which was accompanied by systematic monitoring from the start. Its database "MONIS - Monitoring Information System" was an early warning system for project management. And it allows detailed comparative analyses for strategic management decisions even back to 1993.

In addition, it covers all projects and programmes exceeding €1 m, as well as a considerable number of smaller yet politically most sensitive interventions some of which are implemented by NGOs or UN Agencies (full programme coverage).

Given the uncertain situation in early Tacis years and the then still centralised programme management from Brussels, the monitoring system was based on regional offices including national monitoring experts. It was hence even anticipating the management devolution process of the EC starting in 2000. This in-built monitoring system was flexibly adjusted in line with moving management functions closer to project interventions. It is now part of the Commission's world-wide ROM-Monitoring System<sup>12</sup> applied in each of its Regional Cooperation Programmes.

In a world-wide comparison, ROM monitoring statistics in 2007 show that the Tacis Programme is efficient and partners have well responded to the external assistance rendered. 1

Averages for EuropeAid performance indicator 2.2								
Nu	mber of projects monitored	TACIS	MED	ACP	ASIA	LA	TOTAL	
Category I	Very good performance	19	18	14	7	5	63	
Category II	Good performance	294	124	289	118	133	958	
Category III	Performing with problems	61	28	134	44	42	309	
Category IV	Not performing, projects off track	12	10	74	20	20	136	
	TOTAL	386	180	511	189	200	1466	
		-						
Average		TACIS	MED	ACP	ASIA	LA	TOTAL	
		%	%	%	%	%	%	
Category I	Very good performance	4,9%	10,0%	2,7%	3,7%	2,5%	4,3%	
Category II	Good performance	76,2%	68,9%	56,6%	62,4%	66,5%	65,3%	
Category III	Performing with problems	15,8%	15,6%	26,2%	23,3%	21,0%	21,1%	
Category IV	Not performing, projects off track	3,1%	5,6%	14,5%	10,6%	10,0%	9,3%	
	TOTAL	100,0%	100,0%	100,0%	100,0%	100,0%	100,0%	
Category I	Very good performance	Mn 3A, mcC, mcD						
Category II	Good performance	A, B, max 2 C, no D						
Category III	Performing with problems	A, B, min. 3C, no D						
Category IV	Not performing, projects off track	Mn 1D						

Assessing Tacis through an external and independent monitoring system right from the beginning was certainly not the only factor contributing to this success. But there is no doubt that the Programme's in-built ROM monitoring and early-warning system had a significant effect on positive performance and outcome. contributing to the learning process and at the same time giving evidence of its achievements.

(The EC's external monitoring programme applied in all regional cooperation programmes) <sup>13</sup> Source: ROM Coordination

<sup>&</sup>lt;sup>12</sup> ROM = Result oriented Monitoring

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#### 6. Success Stories

## (1) <u>The Ukraine</u> – a "Market Economy Country"

One of the overall objectives of the Tacis Programme was "to support the process of transition to market economies".

This overall goal was specified for the EC's private sector programme as follows:

"To support the transition of NIS towards a functioning market economy, through building a sustainable resource of viable enterprises able to cope with competitive pressures and market forces".

Since "Market Economy" is a very multi-facetted system, EC sector projects from the beginning set strategic priorities. Some of these projects were directly devoted to the development of a market economy, others more indirectly for example reforming the legal framework or strengthening the business support institutions.

In the case of <u>Ukraine</u>, for example, the following priority areas and their respective projects were supported and pooled under the common sector heading "<u>Transition to market economy</u>".

- Macroeconomic policy, Legal Framework and Social adjustment
- Production sector including Privatisation, SME<sup>14</sup> and Business Development Services
- Trade & Development including export promotion and International Certification
- Banking, Insurance and other Financial services
- Institutional Capacity Strengthening

About 20% of the Commission's budgetary allocations were geared towards this sector. In parallel, the Ukrainian Government issued number of legal acts to adjust the overall business environment and to support this sector.

In short, the (public and private) SME-related institutions, supported by several projects, substantially strengthened their capacity. Staff was properly trained and equipped in order to continue sustainable operation. At the end of projects' implementations, most of supported institutions are capable to continue the project-initiated flow of benefits in the Private sector.

Result: On 1 December 2005, the EU has announced to recognize Ukraine as a ...

#### Market Economy.

Ukraine had fulfilled all technical requirements and the official status came into effect beginning 2006. This decision reflected the substantial economic and social developments in the Ukraine during the last years.

<sup>&</sup>lt;sup>14</sup> SME - Small and Medium (private) Enterprises

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## (2) Integrated Border Management (IBM-Azerbaijan)

In the Tacis Programme, there are quite a number of single *projects – even* limited in size - which nonetheless have a substantial impact on the entire *sector* concerned. A good example is the IBM project in Azerbaijan.

#### Background and Relevance

The 'project' aims to pilot an Integrated Border Management model at a border intersection with Iran. This includes the main road between Baku and Iran and the Nakhichevan enclave of Azerbaijan. An average of 600 passenger cars and 200 trucks cross the border every day, and 100 trucks to/from the Nakhichevan enclave. The sector also includes 30 km of green border, secured with dysfunctional barbed wire fences and electronic alarm systems still dating from Soviet times.

According to the State Border Services of Azerbaijan the project is highly relevant for the country and coherent with other EU and IOM<sup>15</sup> Programmes. The project is implemented by the IOM (Grant Agreement) via its field office in Azerbaijan.

To make it comprehensive, project activities concentrate on six tasks/components from the beginning:

- intra-service and inter-agency cooperation on border management;
- development of the border infrastructure at the Bilasuvar Border Intersection;
- creation of an inter-agency Data Analysis and Forensic Examination Centre;
- legal and regulatory improvements;
- creation of a Border Guards Training School, development of training curriculum, material and equipment;
- replication of the Integrated Border Management concept at all border crossings.

#### What results were achieved?

Following the recommendation given in the IOM report "Review Migration Management in the Republic of Azerbaijan", the President of Azerbaijan established the State Migration Service. This agency is in charge of revising the national migration legislation, including those dealing with entry/exit procedures. The same applies to the definition of the border management competencies and review of border procedures.

The establishment of a Joint Search Team/Criminal Investigation Group is in progress but the project had to adapt its approach because gradually the State Customs Committee became involved in these project activities.

#### What made it a good project?

The project deals with very sensitive and quite new problems for Azerbaijan: creation of a modern legal and regulatory framework for immigration and EU-style institutions for implementation of an effective and transparent immigration policy. In this respect, it is first of all important that the Government shows high commitment.

It is worth mentioning that the Government decided to establish a Border Guards Academy on the basis of the already existing but improved Border Guards Training School. And it is also important that the beneficiary and Government give significant financial contributions to the project. Another important factor for success is that IOM demonstrated very good efficiency in using the EC contribution

All results delivered by the project to date are financially sustainable. E.g. State Budget funds have been allocated to the Border Guards Training School and the State Migration Service.

#### Dissemination

This pilot project may serve as a good example that with relatively little yet strategically well "invested" TA, a much broader impact for the entire sector can be achieved. In this case, it was not only replicated in other locations of Azerbaijan but even served as a good example for other IBM programmes in and outside the Tacis region (e.g. Central Asia or on the Balkans).

<sup>&</sup>lt;sup>15</sup> IOM – International Organisation for Migration

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#### (3) The Tacis ROM-monitoring system

The "success story" of the Tacis Programme would be incomplete without mentioning the systematic monitoring system applied from its very beginning.

The system used during the first years of approximation was simple and adapted to the then state of information, the limited EC presence in the Region and the degree of de-concentration of management. Three types of Monitoring Reports had to assess the following simple questions:

#### (1) Comments on the Inception Phase

- Does the project's Inception Report reflect the partners' needs?
- How is the commitment of the national partners to the project?
- Is there a clear and concise Intervention Logic (Logframe)?
- How is the contractor's performance in this initial phase?

In case, a project was successfully implemented, the following aspects were *regularly* monitored. The frequency of monitoring missions depended on complexity, assessed difficulties, milestones, etc:

#### (2) Regular Monitoring of project performance

- Implementation performance and (intermediate) results of activities to date
- · Achievement of outputs to date
- Appropriateness of work plan for the next six months
- Ability to achieve the anticipated results in time
- · Potential sustainability.

At the end, a final assessment was conducted, which also contributed to transparency and accountability of EC Programme and individual project performance.

#### (3) Final End-of-project Assessment

- Overall contractor performance
- Contribution of project partner to project results
- Results achieved against planned outputs
- Expected Sustainability
- Achievement of specific objectives and lessons learned.

With the harmonisation of the Commission's instruments and methods, the above monitoring scheme was modified to the commonly used <u>ROM-monitoring system</u> – also allowing world-wide comparisons based on a common methodology and applying the same criteria, namely <u>Relevance/Design</u>, <u>Efficiency</u>, <u>Effectiveness</u>, <u>Impact</u> and <u>Sustainability prospects</u>. The basic principles, however, remain contributing their share to the overall Tacis Programme success.

The table below serves as an excellent example of the success story that is monitoring. It demonstrates that for those projects, which are regularly monitored between 2004 and 2006, on average, there is a steady and significant improvement of all monitoring criteria across a project's lifetime.

Table comparing re-monitored operations in 2006 with 2005 and 2004<sup>16</sup>

Re-monitored 2006, 2005 and 2004	TACIS			
N° of operations re-monitored	95 (Average)			
% of total population re-monitored	26 % (Average)			
Year	2004	2005	2006	
Relevance / Quality design	2,74	2,93	3,10	
Efficiency	2,70	2,93	3,05	
Effectiveness	2,74	2,97	3,07	
Impact	2,86	2,99	3,07	
Sustainability	2,92	3,01	3,01	
Average	2,79	2,97	3,06	

 $<sup>\</sup>overline{}^{16}$  A = very good (3.51-4.00); B = good (2.51-3.50) C = problems (1.51-2.50) D = serious deficiencies (0-1.50)

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