Strategic Report on the implementation of the European Economic Area (EEA) Financial Mechanism 2009-2014 in Poland for the period June - December 2011

submitted for the evaluation of the Monitoring Committee for the European Economic Area Financial Mechanism and the Norwegian Financial Mechanism on 27 March 2012

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LIST OF ABBREVIATIONS

AA AUDIT AUTHORITY

CA CERTIFYING AUTHORITY

FMO FINANCIAL MECHANISM OFFICE IN BRUSSELS

MC MONITORING COMMITTEE

NFP NATIONAL FOCAL POINT

MF MINISTRY OF FINANCE

MoU MEMORANDUM OF UNDERSTANDING

MRD MINISTRY OF REGIONAL DEVELOPMENT

PO PROGRAMME OPERATOR

FMC FINANCIAL MECHANISMS COMMITTEE

Executive Summary

This Strategic Report is to meet the obligation imposed on Poland under the Article 5 of the Appendix A to the *Memorandum of Understanding* and the Article 2.2 of the *Regulation on the implementation of the European Economic Area (EEA) Financial Mechanism 2009-2014* (hereinafter referred to as the *Regulation*). It documents Poland's preparations for the absorption of funds under the EEA Financial Mechanism and presents the actions planned for the subsequent reporting period: January – December 2012.

Preparations for implementation of the EEA Financial Mechanism covered support programming phase, establishing an implementation system, preparation of publicity and information activities. By the end of the reporting period, i.e. December 2011, most of the programme proposals were at an advanced stage of preparation and - as far as some measures were concerned - consulted with the particular programme partners from the donor states. Pursuant to the provisions of the *Regulation*, the National Focal Point (NFP), co-operating with the other institutions, prepared draft programme documents, including the Description of the of the management and control system for the European Economic Area Financial Mechanism and the Norwegian Financial Mechanisms 2009-2014, the Guidelines for implementation of the Bilateral Cooperation Fund at the national level and the Guidelines for implementation of Technical Assistance. In addition, there were the Monitoring Committee for the Financial Mechanisms 2009-2014 and the most of Cooperation Committees with participation of the partners established, as well as Programme Operators, Certifying Authority (CA) and Audit Authority (AA) appointed. A key element of the preparatory activities was also a development by the NFP of the draft Communication strategy for the European Economic Area Financial Mechanism and the Norwegian Financial Mechanism 2009-2014.

Entering the stage of programming the EEA Financial Mechanism 2009-2014 became possible upon approval by the Council of Ministers on 24 May 2011 of *Memorandum of Understanding* agreed with the donor side and its official signing between Poland and Kingdom of Norway on 10 June 2011 and between Poland, Lichtenstein and Island on 17 June 2011. The formal conclusion of the agreement commenced the preparation by Poland of programme proposals within an allocation of EUR 287.86 million (including the management costs to be borne by the donors and the Polish side)¹.

¹ On 28 July 2010, an agreement between the states of the European Free Trade Association: Iceland, Liechtenstein and Norway and the European Union on launching a new perspective of the European Economic Area Financial Mechanism and the Norwegian Financial Mechanisms 2009-2014. The beneficiary states of the EEA will be the twelve new European Union Member States and

It is planned that in the next reporting period, the development of the management, financial control and audit system will be completed, all programme proposals will be finally submitted for an appraisal by the donors' side and after its completion, the implementation stage will be initiated.

Introduction

Pursuant to the Article 5 of the Memorandum of Understanding on the implementation of the EEA Financial Mechanism 2009-2014, the Ministry of Regional Development, fulfilling the function of the NFP for implementation of the Financial Mechanisms in Poland, prepared a document entitled the Strategic Report on the implementation of the EEA Financial Mechanism in Poland for the period June – December 2011 (hereinafter referred to as the Strategic Report).

This Strategic Report has been developed by the NFP in compliance with the Article 2.2 of the *Regulation*, for the purpose of the annual meeting held between the representatives of the Polish side and the donors' states of the Norwegian Financial Mechanism and the EEA Financial Mechanism – the Kingdom of Norway, Liechtenstein and Iceland, planned for 2012. Before submission of the document to the donor side, it will need to be evaluated by the Monitoring Committee for the both Financial Mechanisms.

Due to the initial phase of the EEA Financial Mechanism 2009-2014, which in the reporting period mainly involved support programming activities and development of the management and control system, the structure of this first edition of the Strategic Report covers the following issues: analysis of horizontal issues (e.g. assessment of the anticipated impact of the support at national level, cross-cutting themes and bilateral relations), issues related to preparation of the management and control system, information on the preparation status of specific programmes, a review of information and publicity activities, as well as activities planned for the next reporting period, a summary and recommendations.

With regard to the provisions of the Article 2.2 of the *Regulation*, this Strategic Report incorporates information concerning exclusively EEA Financial Mechanism. The NFP shall submit a separate Strategic Report for the Norwegian Financial Mechanism.

1. ANTICIPATED IMPACT AT NATIONAL LEVEL

1.1 Economic and Social Cohesion

The cohesion policy manifests itself in a socio-economic development, which leads to a socially and territorially equal improvement of living conditions, an enhanced human capital (skills and health), and increased social participation. The efforts to ensure the social and economic cohesion determines an economic growth, in which all citizens participate and benefit from.

However, the dynamic development of Poland may be accompanied by disparities, which may take place in the following: income, health, territorial and generational dimensions. Thus, prevention of further deepening social differentiation may become a barrier to maintain a dynamic development of the country in the future. Therefore, measures aimed at ensuring social and economic cohesion in territorial terms are essential instruments to combat potential threats. Financial instruments are designed to support activities to compensate for economic and social cohesion conditions in all regions.

The funds under the Financial Mechanisms 2009-2014 are also envisaged to support the implementation of development related projects that contribute to a reduction of economic and social disparities within the EEA. Achievement of the social and economic cohesion is one of the most important tasks that Poland is facing in the current perspective of the Financial Mechanisms. The financial support programming phase coordinated by the NFP was therefore accompanied by efforts to address the national priorities of the socioeconomic policy as well as the particular policies of the EU. As a result, the use of the funds will perform – equally to the previous edition of the Financial Mechanisms – a complementary function with respect to the interventions under the Structural Funds and Cohesion Fund.

In efforts undertaken towards social and economic cohesion, which involve also the Financial Mechanisms, the need to ensure complementarity with the intervention of the Structural Funds creates the necessity of a reasonable approach both to the investment and non-investment projects. This implies a need for a focus on specific objectives in the particular areas of support. This approach is essential in the context of achieving the intended effects of support from the present perspective of the Financial Mechanisms.

The financial aid available under EEA Financial Mechanism 2009-2014, that supports also achievement of the economic and social cohesion, will be allocated to the precisely defined measures, in particular the implementation of investment projects, aimed at infrastructure development and non-investment projects consisting of local and regional development measures, civil society building, cultural promotion and scientific research cooperation. The first category of activities planned for implementation includes mainly: investment to strengthen initiatives in the field of health, energy efficiency and renewable energy sources

as well as investments in the conservation and revitalization of cultural heritage as well as environmental monitoring. The non-investment measures should be categorized as: capacity building of the local self-government units and cooperation between them, promotion of diversity in culture and arts within European cultural heritage, promotion of non-governmental organizations, promotion of biodiversity and ecosystems, or the scholarship fund.

The list of the particular programme areas with assigned allocation breakdown is shown in the table below.

Programme area	EEA FM contribution
Biodiversity and Ecosystem Services	€ 20,000,000
Environmental Monitoring and Integrated Planning and Control	€ 15,000,000
Energy Efficiency and Renewable Energy	€ 75,000,000
Funds for Non-Governmental Organisations	€ 37,000,000
Local and Regional Initiatives to Reduce National Inequalities and to	€ 9,544,500
Promote Social Inclusion	
Public Health Initiatives	€ 10,000,000
Conservation and Revitalisation of Cultural and Natural Heritage	€ 60,000,000
Promotion of Diversity in Culture and Arts within European Cultural Heritage	€ 10,000,000
Scholarships	€ 5,000,000
Other allocations	
Technical assistance to the Beneficiary State (Art. 1.9)	€ 4,003,500
Fund for bilateral relations at national level (Art. 3.5.1)	€ 1,334,500
Net allocation to Republic of Poland	€ 246,882,500

In addition to the above mentioned measures that the Polish side considers to be an important factor to alleviate the economic and social disparities, the programmes in the new perspective of the Financial Mechanisms will be based on so-called cross-cutting issues. These are: firstly - sustainable development, which is an integral concept of raising living standards in the environmental, economic and social dimensions, secondly - good governance focused on the participation and integration of all stakeholders in the sense of a responsibility and in accordance with the principles of efficiency, transparency and in compliance with the law, thirdly - equal opportunities for women and men, understood as efforts towards gender equality at all stages of program implementation and to combat all forms of discrimination.

1.2 Bilateral relations

Strengthening long-term bilateral cooperation remains one of the horizontal themes within the current edition of the Financial Mechanisms. Still during the discussions on the possible areas of partnership cooperation, which preceded signing the *Memorandum of Understanding*, the donor states identified the necessity of partnerships at programme level. Thus, this proposal introduced a change as compared to the prior edition of the Financial Mechanisms, in which partnerships were established mainly at project level.

During the negotiations with the donors, the Polish side argued that partnerships should be of a voluntary nature and should have an actual added value for the implemented activities and Polish beneficiaries, to whom the support is addressed. After the round of meetings with the donors and inter-ministerial consultations taking place in March and April 2011, the scope of particular partnerships at programme level was initially agreed, and their list was included in Annex B to the *Memorandum of Understanding*.

The table below presents a list of selected programmes in particular areas of the EEA Financial Mechanism with the assigned partners from the donor states.

Programme Area	Programme	Donor Program Partner
Environmental Monitoring and Integrated Planning and Control	Improving environmental monitoring and inspection	Norwegian Institute for Air Research (NILU), Climate and Pollution Agency (KLIF), Norwegian Mapping Authority
Promotion of Diversity in Culture and Arts within European Cultural Heritage	Promotion of Diversity in Culture and Arts within European Cultural Heritage	Art Council Norway (ACN)
Scholarships ²	EEA Scholarship Programme	Norwegian Centre for International Cooperation in Higher Education (SIU), the Agency for International Education Affairs (AIBA), Icelandic Centre for Research (RANNIS)

An important element of building bilateral relations with the donor states under the current edition of the EEA Financial Mechanism is the Bilateral Cooperation Fund. At national level, the Fund supports actions aimed at strengthening bilateral cooperation between the donor states and the Polish side in the scope of the programme areas identified in the Appendix no. 1 to the *Regulation*.

² EEA Scholarship Fund established under the EEA FM (programme area no. 19) and Bilateral Scholarship Programme established under the NFM (programme area no. 24) are implemented in Poland jointly as one operational programme under the common name *Scholarship and Training Fund.*

In 2011, after signing the *Memorandum of Understanding*, steps were taken to launch the Fund. Therefore, a draft budget was submitted to the Financial Mechanisms Office (FMO) in Brussels, covering the whole period of the Fund's operations, including the years 2011 and 2012. On 3 November 2012, the *Agreement for the financing of Technical Assistance and the Fund for Bilateral Relations at National Level* was concluded between the Polish side and the donor states. In relation to the fact that the expenditure within the Fund is eligible as of 11 June 2011 (entry of the *Memorandum of Understanding* for the Norwegian Financial Mechanism into force), beneficiaries of the Fund, i.e. the NFP and Programme Operators, commenced implementation of activities, which consisted mainly in organising meetings and participation in activities undertaken by the donor side. The aim of the meetings was mainly to discuss the issues related to the shape of the proposals of programmes, establishment of the scope of cooperation between Programme Operators and partners, as well as presentation of the institutions involved in preparation of specific programmes.

2. PREPARATION OF MANAGEMENT AND IMPLEMENTATION

Preparation for implementation of the EEA Financial Mechanism covered both the support programming activities, including consultations on the programme documents, development of particular programme proposals, development of the management and control system, as well as preparation of publicity and information activities.

2.1. Programming of funds

2.1.1 Development of programme documents

During the first half of the reporting period, the programming activities under the EEA Financial Mechanism 2009-2014 concerned mainly the final consultations on the content of the programme documents, i.e. the provisions of the *Regulation* and the *Memorandum of Understanding*. The negotiations on distribution of funds between the priority areas were finally concluded in April 2011. The total allocation within the EEA Financial Mechanism amounted to EUR 246.88 million and was reflected in the provisions of the Appendix B to the *Memorandum of Understanding*, in the part dedicated to financial aspects of implementation. The *Memorandum of Understanding* on the implementation of the EEA Financial Mechanism 2009-2014 was adopted at the meeting of the Council of Ministers on 24 May 2011. The *Memorandum of Understanding* was then officially signed between Poland and Kingdom of Norway on 10 June 2011 and between Poland, Lichtenstein and Island on 17 June 2011.

2.1.2 Preparation of programme proposals

As of signing the Memorandum of Understanding, the NFP was responsible for coordinating preparation and evaluation of 9 programmes within the thematic areas of support under the EEA Financial Mechanism 2009-2014. For most of the programme proposals, arrangements concerning their formal side and the substantial scope were settled on working basis between the Programme Operators and the NFP, and partners from the donor states until the end of the reporting period. Due to the fact that the electronic Documentation, reporting and Information system (DoRIS), which allows for, inter alia, efficient submission of electronic applications, was not yet available in the reporting period, the Programme Operators used the provisional programme proposal template, corresponding to the one included in the Programme Operator's Manual (Appendix no. 9 to the Regulation) and the statistical appendix, which enables entering contacts, financial data and indicators. Additionally, in order to streamline the preparation of the programme proposals, the NCP held series of individual and joint meetings as well as training sessions with the Programme Operators, during which they were familiarised with the following essentials issues: detailed implementation principles under the new perspective of the Financial Mechanisms, scope of responsibilities and tasks of the Programme Operators, the rules for preparation of the programme proposals, operational rules of the Bilateral Co-operation Fund, scope and principles of the partnership co-operation and setting up Cooperation Committees. The FMO's representatives attended the one of the mentioned meetings held in August 2011. Furthermore, the FMO in Brussels held the workshop for all NFPs in September and December 2011.

The preparation progress of the programme proposals under the EEA Financial Mechanism 2009-2014 differed with regard to the particular programmes by the end of the reporting period. Therefore, in the programming process, the following categories of programmes shall be listed:

a) programme transmitted to the donors:

Local and regional initiatives to reduce national inequalities and to promote social inclusion

The proposed program was prepared by the Programme Operator (MRD) in permanent consultation with the predefined project promoter - the Association of Polish Cities and project partner - the Norwegian Association of Local and Regional Authorities. The program proposal was forwarded to the donors' appraisal on 20 December 2011.

b) programmes under preparation:

Scholarship and Training Fund

In the reporting period the Program Operator prepared the programme proposal with accompanying assumptions for the partnership cooperation. The Programme Operator established the Cooperation Committee during the meeting with the partners (Norwegian Centre for International Cooperation in Higher Education – SIU and Agency for International Education Affairs - AIBA), which was held on 18 November 2011. After consultation with the partners taking place at the end of the reporting period and after appraisal being done by the NFP, the programme proposal will be transmitted to the donors in January 2012.

Biodiversity and ecosystem services

In the reporting period the program was at a very advanced stage of preparations. The final program proposal, with an accompanying translation into English will be transmitted to the donors' side in early 2012

Development and better adaptation of health care to demographic and epidemiological trends

By the end of the reporting period the program was at an advanced stage of preparation. Distribution of the allocations within the respective programme and the other one, which is fully financed from the funds of the Norwegian Financial Mechanism (*Reducing social inequalities in health*) was finally settled through an exchange of letters between the NFP and the FMC in November and September 2011. It was agreed that EUR 52 million should be dedicated to the programme entitled *Development and better adaptation of health care to demographic and epidemiological trends* (jointly financed out of the EEA Financial Mechanism and the Norwegian Financial Mechanism). This however is restricted with the condition that in the event of a failure to meet the obligations under the programme *Reducing social inequalities in health*, the funds shall be shifted to the second programme within the health area.

Energy efficiency and renewable energy

In the reporting period the program was at a very advanced stage of preparations. It is anticipated that the final version of the programme proposal along with the English translation will be submitted to the donors in early 2012

Environmental monitoring and integrated planning and control

The program is consisting of four predefined projects. One of these projects was of a smaller amount than planned. Therefore, the Ministry of Environment in consultation with the Norwegian partner proposed to transfer a part of the allocated amount to the one of the

project managed by the Chief Inspectorate for Environmental Protection, while the remaining amount would be distributed through an open call for proposals.

Conservation and revitalisation of cultural and natural heritage

The essential preparations of the programme proposal lasted from September 2011 to the end of the reporting period. Development of a potential predefined project was discussed during the meeting organized with a participation of the Norwegian Directorate for Cultural Heritage on 10 October 2011.

Promotion of diversity in culture and arts within European cultural heritage

The essential work on the programme proposal in close cooperation with the Norwegian partner lasted from September 2011 to the end of the reporting period. The final content of the programme, including in particular issues of bilateral cooperation between the Programme Operator and its partner were discussed at the meeting attended by the Art Council Norway (ACN) representatives held on 23 September 2011. The Cooperation Committee meeting with a participation of the programme partner was held on 1-2 December 2011 in Oslo. The final agreement on the programme proposal is anticipated for early 2012.

c) Funds for Non-Governmental Organisations

In the reporting period, the development of the programme was at a stage of preparations for consulting the thematic scope of the Fund among the representatives from the NGO sector. In October 2011, the NFP held a meeting with the Public Benefit Works Council (PBWC), during which the new edition of the NGO Fund under the EEA Financial Mechanism 2009-2014 was announced and the framework set out in the donors' guidelines was presented. In the curse of the meeting the PBWC representatives raised tentative comments on the operations of the Fund. It was also concluded that the next meeting would be held with a participation of the Norwegian side. Therefore, in early November 2011, a joint meeting of the donors, NFP and PBWC representatives was held to present the assumptions of the Fund and launch discussion on the expectations, needs of the NGO sector as well as the conception for implementing the Fund in Poland. During this meeting, the Norwegian side requested the PBWC to undertake public consultations on the thematic scope and content of the proposed Fund. At the next meeting, which took place in early December 2011, the PBWC representatives agreed to coordinate aforementioned consultations however through an another organization having sufficient number of personnel. The preliminary concept of these consultation was then presented during this meeting. As requested by the PBWC and following the discussion with the donor states, the NFP officially addressed the Council to undertake the consultations through appointing the most appropriate organization capable of fulfilling this task. The PBWC resolution in this respect was handed over to the NFP in mid January 2012. It is anticipated that the consultations process will be commenced in the first quarter of 2012, and the call for proposal to select the Programme Operator will be launched in the second quarter of 2012. The estimated date for submission of the programme to the donors is the end of 2012 at the latest.

2.2 Preparation of the management and control system

Pursuant to the Article 4.1 of the *Regulation*, the Beneficiary State shall be responsible for management and control of programmes. The leading role in the system shall be played by the NFP, which on behalf of the minister of regional development, shall fulfil the coordinating function, including preparation of common solutions for all programmes in the scope of organisation and sound management, implementation, monitoring and evaluation of the Financial Mechanisms, thus activities addressed mostly to the Programme Operators and other involved institutions. The NFP shall bear general liability for successful and effective implementation of the both Financial Mechanisms in Poland as well as achievement of their objectives. It shall also be responsible for compliance and application of the appropriate principles and procedures concerning the management of the financial support and ensuring their implementation by the Programme Operators.

In relation to its special role in the management and control system, the NFP undertook in the reporting period to prepare documents describing two separate systems: firstly, the management and control system for national institutions involved in implementation of Financial Mechanisms 2009-2014 (i.e. the NFP, the MRD Certifying Authority Department (CAD), the Audit Authority (AA)); and secondly, the management and control system for the Programme Operators. In the case of the EEA Financial Mechanism, the final versions of the documents describing each of the aforementioned systems shall be submitted to the Financial Mechanisms Committee (FMC).

As regards the first of the systems, it was prepared in compliance with the general assumptions of the management and control system determined by the *Regulation* and presented in the draft document entitled *Description of the management and control system for the European Economic Area Financial Mechanism and the Norwegian Financial Mechanism 2009-2014*. The draft document was developed by the NFP in December 2011 in close co-operation with the relevant units of the MRD and the Ministry of Finance. The following elements were among those taken into account:

 a) a detailed system structure, including organisational links between institutions participating in the management and control system and determination of the scope and competences;

- b) procedures concerning proper and timely expenditure and the financial reporting system;
- c) reporting procedures and monitoring of irregularities;
- d) procedures concerning audit activities at project and programme levels, as well as an audit of the management and control system performance.

The separate management and control systems are also prepared by the Programme Operators. The obligation to prepare such systems results from the Article 48.2 of the *Regulation*. Pursuant to that article, the Operators – through the NFP - shall provide the FMC with detailed descriptions of the management and control system within 6 months after expiry date for submission of the first interim report for the given programme. Therefore, in the reporting period, the NFP also provided support to selected institutions in a preparation of the document *Description of the management and control system for Programme Operator*. At the beginning of July 2011, the NFP submitted to the Programme Operators a provisional and partially completed template of that system, modelled on the document binding in the case of the EU funds. Furthermore, to ensure consistency of the two systems and guidelines for further programming works, the NFP shall provide the Programme Operators with an approved version of the *Description of the system of management and control for the European Economic Area Financial Mechanism and the Norwegian Financial Mechanism 2009-2014* definitely agreed with the CA and the AA.

In the reporting period, the Polish side undertook actions to create an institutional structure for the Financial Mechanisms implementation system. The list of the key institutional entities established to fulfil the functions attributed by the appropriate articles of the *Regulation* shall be set out in the description of management and control system currently drafted by the NFP.

2.3 Preparation of information and publicity activities

In order to implement the provision included in point 2.3 of Annex 4 *Information and Publicity Requirements* to the *Regulation on the implementation of the EEA Financial Mechanism* 2009-2014, the NFP developed a document entitled *Communication strategy for the European Economic Area Financial Mechanism and the Norwegian Financial Mechanism* 2009-2014. The main strategic goals include:

- continuation of the successful information and publicity campaign implemented during the previous edition of Financial Mechanisms in Poland;
- ensuring an easy access to important information for all stakeholders, in particular concerning the possibility to apply for grants under the Financial Mechanisms and support in preparation of applications,
- development of a coordinated and proactive attitude towards information and publicity addressed to the institutional entities.

- informing the public on the Financial Mechanisms, namely the outcomes reached during the implementation process and on how they support the bilateral relations between Poland and the donor states.

In the body of the document, the NFP highlighted the following issues: the general principles, assumptions and goals of publicity activities, analysis of the media environment and related opportunities, identification of the target groups, examples of tools and publicity and information activities, determination of the time-frame and the budget. Having looked at the deadline determined in the *Regulation*, the communication strategy was submitted to the FMO on 14 October 2011.

The FMO developed guidelines for preparation of communication strategies along with plans of communication for the Programme Operators and submitted them to the particular NFPs in mid-November 2011. As a follow-up, the FMO addressed the NFP with a request to adjust the provided strategy to the aforementioned guidelines.

In the letter of 12 December 2011, the FMO identified the need to take into account a new objective of publicity activities under the Financial Mechanisms, concerning the importance and benefits of a bilateral cooperation with the donors. The aforementioned correspondence contained also a suggestion that the document should be modified through detailing some issues such as: perspectives for activities promoting partnerships, description and prioritisation of promotional activities in specific areas, description on how the Internet can be used, coordination and cooperation with the main institutional partners, including the Embassy and the Programme Operators. Having looked the those comments and recommendations, the NFP modified the original version of the communication strategy until the end of the reporting period and submitted it to the FMO during the first half of January 2012.

In mid-November 2011, the NFP provided the Programme Operators with the first part of the Communication and Design Manual and the Developing a communication plan for programmes under the EEA Grants/Norway Grants 2009-2014 - Guidance for the Programme Operators.

The Manual is supposed to eventually become a helpful tool in the scope of information and publicity for all institutions in the beneficiary states – e.g. the National Focal Points, Programme Operators, and other institutions involved in implementation of the Financial Mechanisms, which do not have sufficient experience in this regard. In mid-November 2012, the FMO provided for the first part of that manual (a draft version). The purpose of submitting the first part of the manual was most of all practical guidance for the Programme Operators in the development of the communication plans, in particular incorporating the provisions of Annex 4 to the *Regulation* into specific strategies, plans and activities. The second part of the

manual will include guidelines on how to properly use the logotypes and present the templates of brochures, leaflets, posters etc., downloadable from the Internet.

3.WORK PLAN FOR JANUARY – DECEMBER 2012

3.1 Start of the implementation phase

From the beginning of the new reporting period, the NFP will continue the actions aimed at finalisation of the particular programme proposals and submission them for the donor's appraisal. With regard to the deadline set out in the *Regulation* and looking at a few months' appraisal by FMO and FMC as well as review of the documents by the European Commission, the NFP estimates that all finally agreed versions of the programme proposals (beside the civil society programme, for which no Programme Operator had been selected so far) will be transmitted to the donor side in the first half of 2012. Efficient appraisal of the submitted programmes by the donor side will enable a prompt launch of the implementation phase, thus meeting the schedule established by the Programme Operators. The Polish side is of the opinion that a key element at the appraisal stage is to involve the NFP in the process of consultations and incorporating comments from the donors addressed to the Programme Operators.

3.2 Establishment of the management and control system

In the next reporting period, the NFP will carry out activities to establish procedures and control system for the NFP, CA and AA. For that purpose, in the first quarter of 2012, it is anticipated that the contents of the document *Description of the management and control system for the European Economic Area Financial Mechanism and the Norwegian Financial Mechanism 2009-2014* will be definitely agreed. Similarly to the programme proposals, developing a description of the management and control system and its submission to the FMC shall take place in the first quarter of 2012 (Article 4.8, point 1 of the *Regulation*). In the next reporting period, the NFP shall also cover activities aimed at ensuring conformity of the aforementioned management and control system with specific descriptions of the management and control systems developed by the Programme Operators and timely submission of these documents to the donor's side, i.e. within 6 months after provision of the first interim financial report for a given programme (Article 4.8 point 2 of the *Regulation*).

The first meeting of the Monitoring Committee for the new edition of the Financial Mechanisms 2009-2014 will take place on 27 March 2012. Assessment of this Strategic Report will constitute one of the agenda items.

3.3 Information and publicity

Following the FMO's comments communicated to the Polish side in December 2011, the NFP shall submit a modified version of the document entitled *Communication Strategy for the European Economic Area Financial Mechanism and the Norwegian Financial Mechanism* in mid-January 2012. The information and publicity activities will be carried out by the NFP and Programme Operators in compliance with the adopted assumptions. In addition, some publicity activities will be undertaken in the next reporting period linked with the two important events related to implementation of the Financial Mechanisms in Poland:

- the visit of Minister Elżbieta Bieńkowska in Oslo on **16-17 April 2012** a meeting with the Norwegian Minister of Foreign Affairs and participation in a conference devoted to presentation of the outcomes of the projects implemented under the previous edition of the Financial Mechanisms, as well as signing and launching the programme *Local and Regional Initiatives to Reduce National Inequalities and Promote Social Inclusion* are planned for the visit.
- a visit of the King of Norway in Poland on **9-11 May 2012** organisation of various accompanying events, including participation in the European Funds Forum, organisation of a conference launching subsequent approved programmes under the Financial Mechanisms, such as the *Scholarship Fund, Bilateral Research Cooperation*, opening projects already implemented under the Financial Mechanisms.

3.4 Bilateral Cooperation

In relation to the obligation imposed on Poland under the *Agreement for the financing of Technical Assistance and the Fund for Bilateral Relations at National level* at the beginning of the next reporting period Poland will provide the donor with the work plan and the *Implementation System for the Bilateral Cooperation Fund at the national level*. The aforementioned documents will be a subject to the donors' appraisal, including meetings, during which the shape and substantial scope of the documents will be discussed.

4. SUMMARY AND RECOMMENDATIONS

The activities of the NFP and other institutions involved in implementation of the EEA Financial Mechanism 2009-2014 in Poland in the reporting period: June – December 2011 focused on development of the programme framework, establishment of the implementation system and carrying out preliminary information and publicity activities. Despite the need to carry out consultations on the draft programme documents with the stakeholders, programming activities on the donors' side (development of the new implementation principles and the content of the *Regulation*), the programming stage of the EEA Financial Mechanism progressed smoothly.

The launch of the implementation phase, which is expected in the second half of next reporting period, determines the structure and content of this document. The Strategic Report could not therefore provide for an entire assessment of the EEA Financial Mechanism toward its effects on achieving the objectives of the Mechanism, as well as cross-cutting issues such as sustainable development, gender equality and good governance.

Although the need to continue programming and systemic preparatory work is still visible, the activities actions of all entities involved in the implementation of the EEA Financial Mechanism in the next reporting period will be focused on the tasks related to launching calls for proposals, appraisal and selection of applications as well as subsequent monitoring, control and audit activities. Following the lessons learned from the initial programming phase, the NFP is of the opinion that the aforementioned activities should be conformed to:

- 1. The compliance with the established communication system between the stakeholders. Implementation of that recommendation is a key element owing to the complex implementation structure of the Financial Mechanisms, in which many entities act on various levels. A clear and consistent communication system is essential for the success of the whole programme. It will allow for an efficient information flow and contribute to an appraisal of programmes and insights into particular activities. It is also particularly important at the programme appraisal stage, when the frameworks for a long-term implementation process had already been established.
- 2. Transparency of documents, rules and eligible expenditures for activities under the individual funds of bilateral cooperation.