2014:1 Sida Decentralised Evaluation

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Review of the Sida-funded Institutional Cooperation in the Field of Environment in Ukraine

Final Report

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Commissioned by the Embassy of Sweden in Ukraine

Date of final report: January 2014

Published by Citat 2014

Art. no. Sida61696en

urn:nbn:se:sida-61696en

This publication can be downloaded from: http://www.sida.se/publications

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Table of contents

Table of contents **2**
Abbreviations and Acronyms **3**
Preface **4**
Executive Summary **4**
1 Introduction **9**
2 Findings on achievement of objectives and results **11**
2.1 SEPA programme 11
2.2 The SSM Programme 18
3 Assessment of the evaluation questions related to programme performance **26**
3.1 Evaluation questions related to programme performance 26
3.2 Summary of programme performance against the DAC criteria 41
4 Implications and recommendations for future cooperation **48**
4.1 Lessons learned and the Implications of the finding and assessment on future cooperation 48
4.2 Findings and recommendations 51
Annex 1 – Terms of Reference **58**
Annex 2 – List of people met and interviewed **62**
Annex 3 – Selected list of documents reviewed **63**

Abbreviations and Acronyms

AA	Association Agreement
BAT	Best Available Technologies
BAP/BHP	Basic Approximation Plan; Basic Harmonisation Plan
DAC	Development Assistance Cooperation (OCED)
DCFTA	Deep and Comprehensive Free Trade Agreement
EIA	Environmental Impact Assessment
EU	European Union
EcOT	European Energy Community Treaty
IPPC	Integrated Pollution Prevention and Control
LFA	Logical Framework Approach
MoH	Ministry of Health
MENR	Ministry of Environment and Natural Resources
NEAP	National Environmental Action Plan
NES	National Environmental Strategy
NGO	Non Government Organisation
OECD	Organisation for Economic Cooperation and Development
PFM	Public Financial Management
QA	Quality assurance
QC	Quality control
SBS	Sector Budget Support
SEPA	Swedish Environment Protection Agency
Sida	Swedish International Development Cooperation Agency
SNRIU	State Nuclear Regulatory Inspectorate of Ukraine
SSM	Swedish Radiation Authority
TA	Technical Assistance
TOR	Terms of Reference
UNOPS ENVSEC	United National Office for Project Services – Environment and Security Initiative
WFD	Water Framework Directive

Preface

This evaluation report is the result of the review of the Sida-funded Institutional Cooperation in the Field of Environment in Ukraine 2009-2013 that have comprised of institutional cooperation programmes between the Swedish Environment Protection Agency (Naturvårdsverket) (SEPA) and the Ministry of Environment and Natural Resources (MENR) of Ukraine and; the Swedish Radiation Authority (Strålsäkerhetsmyndigheten) (SSM) and the two government authorities in Ukraine – the Ministry of Energy and Coal Industry, and the Ministry of Health (MOH) of Ukraine.

The evaluation was conducted over a period from September to December 2013 by Indevelop AB under the Sida framework agreemen for evaluation and reviews. The Project Manager at Indevelop for this study, Anna Liljelund Hedqvist, has been responsible for compliance with Indevelop's QA system throughout the process and quality assurance was performed by Ian Christoplos, Project Director for the Framework Agreement.

The evaluation team consisted of Eric Buhl-Nielsen as Team Leader, and Vera Devine and Gazizullin Ildar as evaluators.

Executive Summary

This is a review of the Sida-funded Institutional Cooperation in the Field of Environment in Ukraine 2009-2013 that have comprised of institutional cooperation programmes between the Swedish Environment Protection Agency (Naturvårdsverket) (SEPA) and the Ministry of Environment and Natural Resources (MENR) of Ukraine and; the Swedish Radiation Authority (Strålsäkerhetsmyndigheten) (SSM) and the two government authorities in Ukraine – the Ministry of Energy and Coal Industry, and the Ministry of Health (MOH) of Ukraine.

1. Findings on achievement of objectives and results

Overall finding - The objectives of SSM and SEPA programmes have only been partially achieved. A combination of political and administrative factors, out of the control of the programmes, has significantly reduced their impact. Over-optimistic design, inadequate project management and deficiencies in the provision of technical assistance and management of capacity development have also played a part.

For the SEPA programme, the environmental governance and the Integrated Pollution Prevention and Control (IPPC) projects have achieved their results, the water management project less so. Even where results have been achieved, due to political and administrative matters beyond the programme control, these results have not been used or implemented. Therefore the intended outcomes and objective have only been partially reached. The water management project has not achieved its aims yet - only an estimated 30% of the results have been achieved, in part because they were far too ambitious in the time scale and given the political and administrative constraints. The capacity building aspects have in general been very difficult to measure, as no baseline or capacity indicators or clear outputs were defined. The evaluators have had to rely on anecdotal information on capacity development where this is available.

For the SSM programme, the Uranium tailings project has largely achieved its objectives, whereas results for the other projects on radon gas and medical radiation safety have been more limited. The uranium tailings project objectives were formulated at an appropriate level of ambition and aligned to a natural strategy. The Radiology project partially achieved its results, but it is judged that the volume and quality of training is insufficient to provide lasting results. The Radon gas project, although creating some valuable results, did not benefit from being linked to a national strategy and although valuable information and technical insight was transferred, the project results suffered from inefficient training and capacity building due to poor selection of trainees.

2. Findings on major deficiencies

Many of the projects within the programme are not given high priority by the Ukrainian partners in practice - despite the selection of relevant cooperation areas and the inclusion of the projects in the National Environmental Action Plan (NEAP). A major reason is the shift in attitudes and priority given to integration with the European Union (EU) since 2008/9 when the programme was prepared. This particularly affects the SEPA programme, where the main thrust is towards integration of environmental legislation and practice with the EU. The urgency and political imperative to hasten approximation to EU legislation has diminished considerably since the programme was designed.

The absorption capacity of the Ukrainian partners is less than expected. The low prioritisation given to the programme tends, in turn, to reduce the absorption capacity as less resources and political capital are devoted to achieving programme objectives. One of the other major reasons for the reduced absorption capacity was the administrative reform of 2010 which disrupted government operations at a crucial period and left many of the partners with far fewer staff and a much smaller budget than before. The administrative reform was an opportunity to increase the productivity of the public sector which should have seen an increase in its absorption capacity, but this has not been the case in practice. Not all the administrative reforms were fully implemented and not all were well conceived.

The delivery of technical assistance has not always been highly effective. Technical assistance delivery has been influenced by the low prioritisation and absorption capacity of the Ukrainian partners. Low ownership and capacity has contributed to poor coordination of technical assistance. It has been difficult for SEPA/SSM to provide resources on short notice, which has been further compounded by the rapidly changing demands and lack of longer term planning on use of TA. For some projects SEPA/SSM did not have in-house skills and a large percentage (over 50%) of the programme is outsourced to others. The lack of a physical presence of the SEPA/SSM team in Ukraine has led to a tendency to work by correspondence. This has resulted in inadequate communication between SEPA/SSM and their partners as well as an inability to react when the best opportunities for collaboration arose. Language barriers have further led to the development of a communication gap (lack of sufficient English language skills of the Ukrainian counterparts). The projects are not integrated into institutional workplans and budgets and the projects are not officially registered, which has meant that the technical assistance is not linked to formal institutional priorities.

3. Detailed findings and recommendations

Finding 1 – EU-Ukraine and Sweden-Ukraine environmental cooperation has a high potential in the longer term despite the challenges faced.
Recommendation 1 – Ukraine and Sweden should develop a further phase of environmental cooperation closely linked to cooperation with the EU.

1.1 Sida should base the design of a future phase of cooperation on a realistic assessment of the level of political commitment and the administrative absorption capacity.
1.2 Sida should consider whether to have a separate programme of cooperation or merge with a future EU support programme (the findings of this review tend to favour a separate programme that is closely coordinated with the EU support).
1.3 The choice of cooperation areas, partners and modalities of capacity development and technical assistance delivery should be re-designed learning from earlier phases of cooperation (see findings and recommendations 2 to 5).

Finding 2 – Ukraine's political commitment towards EU environmental approximation crucially affects the realistic level of ambition, the pace of reform and the ultimate success of environmental cooperation.
Recommendation 2 – Awaiting clarification on the signing of the Association Agreement, future environmental cooperation should be flexible and responsive to positive signs of change.

2.1 Sida should develop a coherent strategy for assessing and responding to uncertainty in the level of political commitment together with the EU (and other development partners).
2.2 Sida should, in future environmental cooperation, support Ukraine in a flexible manner so that greater resources become available in response to windows of opportunity, whether arising from business interests, public pressure or planned government reform agenda.
2.3 Sida should consider selecting non-state partners where a long period of uncertainty in the level of political commitment is expected.
2.4. Sida should develop a clear approach/policy on cooperation between the programme managers and the Embassy in the event of projects becoming embroiled in political aspects. The programme management should provide regular (even informal) updates. Sida should consider providing more internal resources to allow the Embassy to become more involved in assessing and determining how best to respond to changing circumstances.

Finding 3 – Most cooperation areas under the current SSM and SEPA programmes continue to be relevant.
Recommendation 3 – A future programme of environmental cooperation should continue within environmental governance and approximation. Assessment of future cooperation on radiation should be made.

3.1 Sida and its partners should continue cooperation within environmental governance and approximation focusing on IPPC and the Water Framework Directive (WFD) and potentially waste management.
3.2 SSM and Sida should engage in discussions on the potential for future cooperation within radiation safety. Unless substantial new areas of cooperation can be found, Sida should consider to support future cooperation between SSM and Ukrainian authorities on a low intensity basis.

3.3 Cooperation should be linked to those policy areas that reflect specific requirements of the AA agenda and international conventions. Cooperation areas should be based on criteria that include the scale of transboundary impacts.

Finding 4 – The absorption capacity of public sector partners is highly constrained and is likely to remain so especially in an unfavourable political context
Recommendation 4 - Sida should consider developing a strategy for cooperating with non-state actors in its next environmental cooperation programme

4.1. Sida should consider when and how to engage with non-state actors given a continuing unfavourable political context.
4.2 To support the next cooperation programme, Sida should assess the potential for cost effective support to non-state actors, the choice of potential partners and alternative modalities of support, e.g. call for proposals; core support to key organisations; design of specific projects etc.

Finding 5 – Capacity has increased but it is not easy to measure it in the current results framework. Technical assistance has been effective although not always efficient. There are opportunities for improving the delivery and absorption of capacity development and technical assistance**.**
Recommendation 5 - Sida should develop a capacity development and technical assistance strategy as part of a future cooperation programme that addresses the specific needs and situation for each partner and intervention.

5.1 Sida should develop a technical assistance co-ordination framework with the EU. This could include consideration of different options: i) be purely complementary and withdraw as soon as possible once the EU has satisfactory technical assistance in place or ii) envisage strong coordination and agreement with the EU on specific areas of responsibility.
5.2. Capacity development and technical assistance options and aspects should be considered including. i) formal twinning; ii) leadership of a future environmental programme either by consultants or SEPA; iii) low intensity support on radiation safety; iv) partnering with the National Academy of Public Administration (NAPA) to develop and run regular trainings for the civil servants (both for entry-level and mid-level staff).
5.3 Future technical assistance and capacity development will need to be: more based physically in Ukraine; more flexible (withdrawing when not needed or where the circumstances are not favourable); acceptant that repeat training will be needed when staff change; better at ensuring only relevant staff are selected for training; based, where procurement is needed, on a transparent procurement analysis and procurement plan; integrated into the workplans and budgets of national partners; based on a flexible but also rigorous results based capacity development framework that in turn is founded on a readiness assessment.

1 Introduction

The overarching goal of Swedish development cooperation with Ukraine (2009-2013) is deeper European Union (EU) integration within democratic governance and human rights, and within natural resources and environment. The goals for the environment sector are: the improved capacity of Ukrainian authorities to formulate and implement EU harmonized legislation and regulatory frameworks in the field of environment and climate change; reduced pollution in the air, ground and water, and increased energy efficiency. During 2009-2013 Sida has been supporting the institutional cooperation programmes between: the Swedish Environment Protection Agency (Naturvårdsverket) (SEPA) and the Ministry of Environment and Natural Resources (MENR) of Ukraine and; the Swedish Radiation Authority (Strålsäkerhetsmyndigheten) (SSM) and the two government authorities in Ukraine – the Ministry of Energy and Coal Industry, and the Ministry of Health (MOH) of Ukraine.

The SEPA programme of cooperation aims to promote an efficient environment protection in Ukraine with special emphasis on approximation to EU's legal framework and international conventions and; contribute to improved capacity of the Ukraine authorities to develop and implement environmental legislation and regulations in accordance to EU's legal framework and international conventions. To support these aims SEPA prepared and approved with Sida six separate projects for the amount of SEK25 million.

The SSM programme of cooperation aims to help improve the radiation safety and management in Ukraine. To support these aims SSM prepared and approved with Sida, four separate projects for the amount of SEK 33 million.

Since the programme interventions will end in 2013, Sida decided to evaluate the effects/ outcomes from the said programmes, specifically to:

1. Determine the effects/outcomes from the programmes by way of addressing the established goals,
2. Analyse institutional and other deficiencies and impediments that possibly prevented SEPA and SSM to achieve the institutional cooperation objectives, and
3. Advise of the potential areas of cooperation in the areas of environment protection where the Sweden's experience can be of demand beyond 2013 considering the Ukraine's ten-year Strategy for the Environmental Sector development 2010-2020, the Action Plan 2010-2015.
4. Prepare, to the extent possible, an overall opinion as regards to the progress of Ukraine by way of implementation of the Action Plan for the Ukraine-EU Association in the areas of ecology and environment protection and identify major deficiency areas that require improvements.

The review also aims to:

- Review the evolution of the SEPA and SSM programmes' implementation during 2010-2013
- Assess the progress of the stated programmes, notable achievements, and areas of possible cooperation in future
- Assess the deficiencies and assumed reasons for these
- Assess the choice of the intervention modalities and the risks observed
- Assess the absorptive capacity of the Ukrainian partners and their motivation/incentives for reforms
- Assess anticorruption and gender considerations for implementation of the stated programmes
- Provide lessons learned, and recommendation for possible (dis)continuation of assistance in the reviewed technical areas beyond 2013

The overall methodology is described in the inception report (Indevelop, October 2013) and consists in summary of:

- A desk review of all the relevant material (see Annex 2)
- Interview of key people involved in the programme at Sida, SEPA and SSM (see Annex 3)
- Field confirmation in Ukraine ,where the partner organisations, consultants, relevant NGOs and the Sida Representation were interviewed(see Annex 3)
- Confirmation of main findings through correspondence and interview with key stakeholders including checking with SEPA/SSM on the main evidence in the tables presenting the result of assessment of the attainment of objectives, results and indicators.
-

2 Findings on achievement of objectives and results

2.1 SEPA PROGRAMME

The SEPA programme is composed of 5 projects and a number of other budget lines:

Budgets 2009-2013	**Budget**	**Expenditure /end 2012**
SEPA:	SEK (m)	SEK (m)
1. Environmental governance	5.54	3.30
2. Development of legal system/ implementation of water management	2.56	1.80
3. Legal system and implementation of the IPPC Directive	4.57	2.90
4. UN Convention on Long-Range Trans-boundary Air Pollution	1.98	1.10
5. Transboundary water management cooperation	4.00	4.00
(Solid waste management)	0.13	0.10
(International Training Programme (ITP))	1.68	0.50
(Programme administration)	4.00	3.00
Total	**24.46**	**16.70**

Operationally the programme has been running for 4 years, so far 68% of the budget has been spent over 75% of the programme period.

The solid waste management project was never started because the Ukrainian partners did not want to pursue it. The project on the UN convention on long range transboundary air pollution was started but was halted early because it was not a priority of the partners involved. The project on transboundary water management cooperation is sub-contracted in its entirety to a third party (UNOPS ENVSEC[1]). For these reasons the analysis of results will focus on the main projects implemented by SEPA under the programme i.e. environmental governance (#1); water management (#2) and Integrated Pollution Prevention and Control (IPPC) (#3). Issues related to the other projects will be dealt with as part of the evaluation questions in the next chapter.

[1] United National Office for Project Services – Environment and Security Initiative

2.1.1 Environmental governance

Table 2.1.1 Project: Environmental governance			
Objectives/results /indicators (performance target)		**Evidence of achievement[2]**	**Problems encountered**
To contribute to diminished negative effect on the environment in Ukraine by improving environmental governance at national level (long term Objective)		It is too early to draw meaningful conclusions on environmental effects. A comprehensive state of environment report is not published. Environmental effects are influenced by many factors including a slow down in the economy following the financial crisis.	Donor coordination mentioned as a constraint Staff instability - Constant change of leadership and staff Administrative reform led to temporary loss of capacity and did not seize all the opportunities to improve institutional performance e.g. reducing the overlap between ministries in undertaking environmental functions.
Strengthened capacity for the Ministry to implement the National Environmental Strategy and Action Plan (project objective)		No systematic capacity goals or means of monitoring capacity improvements has been put in place. Evidence of capacity increase related to the project includes: ○ Individual capacity has improved but is not stable and is not institutionalised mainly due to staff turnover. Capacity that has been built up with individuals in the legal department has been lost due to staff turnover. ○ The Basic Approximation Plan / Basic Harmonisation Plan (BAP/BHP) has increased knowledge and insight of approximation issues ○ Quality of the MENR monitoring and reporting has improved ○ Capacity has been built through the round table and thematic working groups not only within MENR but within private sector and civil society ○ The sector capacity for horizontal interaction (between public, private and civil society and across line ministries) has improved due to round table.	
The Ministry initiated internal administrative reform in order to effectively implement National Action Plan (result)		The project has developed draft orders and institutional analysis and recommendations that define competences. However, although useful for the future these have not yet been implemented as a final decision to go ahead on implementing approximation (as opposed to preparing for approximation) has not been made (awaiting signing of the association agreement).	
Indicators (2013):	Ukraine better prepared for association agreement	Evidence: ○ BAP and BHP completed and approved + approximation plan – conclusion: better prepared ○ The detailed bills that would put the key framework directives into law have not been drafted – this requires highly	Less interest in the legal department on approximation due to other priorities and the fact that the association agenda is not yet signed.

[2] Evidence in this table and the other project tables in this report is from: i) annual reports, ii) project reports, iii) interviews with national partners, technical assistance personnel and iv) a final check of the draft with SEPA/SSM (where relevant).

Table 2.1.1 Project: Environmental governance			
Objectives/results /indicators (performance target)		**Evidence of achievement[2]**	**Problems encountered**
		specialist knowledge and detailed analysis of the costs of implementation – tasks that are beyond the MENR and the scale of the SEPA project (and reportedly beyond the skill set of the EU Technical Assistance (TA) project because of the degree of specialisation).	A focus simply on meeting the EU demands and not on actually implementing them is evident in the view of some. SBS was not released. Interest level is person driven rather than driven by institutional priorities.
	Strategy & NEAP effective initial implementation	○ Implementation of the National Environmental Action Plan (NEAP) as measured through the EU midterm review shows a 70% achievement level in 2011 and a 50% level in 2012 against 9 indicators related to the NEAP. The support in 2010/11 was provided by SEPA as the EU project only started in December 2011. ○ Key contributions included: i) "Methodological Guidelines on incorporation of main provisions of the Law of Ukraine; ii) "On the Fundamental Principles (Strategy) of Ukraine's State Environmental Policy for the Period until 2020" and iii) National Action Plan on environmental protection for 2011-2015 into programmes of sectoral and regional development".	
	MENR has a structure for EU work	See comments under the result section above.	
Potential implications for future cooperation: • The capacity building seems to be unstructured and to some extent naïve - especially given that similar problems were experienced in the last programme (2004-2009). It would be wise to adopt an approach that tests "readiness" to make use of capacity building and seeks to understand the incentive environment, the drivers of change and a realistic intervention logic. • Much of what was done, even if it has not led to implementation yet, is not wasted and will be useful for the future (even if it might need updating). • If the conditions of low absorption do not change, a future programme could consider supporting sector institutions (as the Southern Boog project does) and supporting civil society and the private sector. • It was appropriate to link the project to the wider EU efforts and to the drivers of the Association Agreement (AA) and the Sector Budget Support (SBS) – unfortunately these ended up being weaker than expected (as there was a political shift away from the association and SBS was not released due to wider public financial management issues). • There is a consensus on the need for future support to be directed at implementation of specific issues/ directives with relatively small efforts in drafting and planning of implementation at national level.			

The overall objective of a "diminished negative effect on the environment" is long term and there is not enough evidence yet that this has been achieved. It would be plausible in the intervention logic to conclude that some of the governance measures put in place by the programme (e.g. better links to civil society) will eventually have an environmental effect but it cannot be measured at present.

The project objective of greater Ministry capacity to implement the NEAP has been partially achieved as civil society, private sector and other sectors have been engaged in closer cooperation and thus the overall capacity in the sector has been strengthened. There have also been tangible improvements in the quality of environmental reporting. However, much of the capacity built up within the ministry itself has been lost due to staff changes (lost to the ministry although not necessarily lost to the sector). At the same time the ministry capacity has reduced due to internal administrative reform and budget cuts.

The result of initiating administrative reforms for implementing approximation to the EU has been largely achieved but doubts remain over whether the administrative measures will be implemented. The draft orders and institutional analysis and recommendations that define competences will however be useful for the future even if not implemented in the short term.

In summary, the objectives and results are partially achieved but there are doubts on how soon the measures proposed will be implemented given the low operational capacity of the ministry and the varying commitment to the overall goal of environmental approximation to the EU directives. It is likely that if political commitment is made to EU approximation then the results already achieved can be further built on to create a lasting environmental benefit.

2.1.2 Development of legal system/ implementation of water management

<table>
<tr><th colspan="3">Table 2.1.2 Project: development of legal system and implementation of water management</th></tr>
<tr><th colspan="2">Objectives/results /indicators (performance target)</th><th>Evidence of achievement</th><th>Problems encountered</th></tr>
<tr><td colspan="2">To contribute to an improved water quality by introducing integrated water management under the principles of the EU Water Framework Directive (overall objective)</td><td>The project has not yet had an impact on water quality. There could still be a potential impact in the future but this is uncertain and will depend on many other factors.</td><td rowspan="5">Institutionalisation – The project is not internalised as a priority - Regional water authority staff have to work in their own time and grasp topics outside their area of competence.
Concept - Difficulty in understanding the WFD per se. Mental barriers to envision an implementation due to perceived limitation to the present system, an overall distrust in the political system to make necessary changes, and the financial challenges. Data is scarce making analysis difficult. Lack of experience in evaluating data, especially in an environmental context.
Staff - SEPA have lost people/skills in water - Staffing problems on partner and consultant side. The national technical and scientific competence is very narrow.
Commitment – new head of Vinnitsa water administration is less interested, while the State water</td></tr>
<tr><td colspan="2">Capacity of Ukrainian water authorities to implement the river basin management plan for Southern Boog (project objective)</td><td>Regional staff has been active in the presentation and production of reports. There is anecdotal evidence that the identification of priority pollutants and the program of measures has changed mindset and provided tools that will increase future capacity to manage the river basin.</td></tr>
<tr><td colspan="2">The river southern Boog is administered in accordance to the EU water directive</td><td rowspan="3">• The river is not administered by the water framework directive
• Screening of priority pollutants done
• Typography report done
• Reference conditions & status classification done</td></tr>
<tr><td rowspan="2">Indicators (2013):</td><td>Management plan finalised under development not yet finalised – project has contributed</td></tr>
<tr><td>Main obstacles for WFD implementation</td></tr>
</table>

Table 2.1.2 Project: development of legal system and implementation of water management			
Objectives/results /indicators (performance target)		**Evidence of achievement**	**Problems encountered**
	identified and presented to national authorities	• Programme of measures including new monitoring plan done	authority is passive. Many staff involved are highly interested and committed but the institutions involved are less committed. Institutional set up - between region / national and horizontally with other agencies is weak. Language is a problem.
	Dissemination of findings in the whole region		
Implications for future cooperation (ideas to be tested): (see notes provided at meeting) • Projects need to be integrated into work plans and priorities of the authorities or they end up as extra work to an already overloaded staff. Early identification is needed of relevant authorities or institutions, depending on type of topic, which need to be given mandate and resources to participate. • Ambition level is very high and needs to be lowered. Focus on specific topics, but with a clear vision of the significance in relation to the Water Framework Directive as a whole, including other closely integrated EU-directives. • Laying the foundation to implement the Waste Water Treatment Directive should be highly prioritized. This would first of all require setting up an appropriate monitoring and reporting of basic data, also regarding population statistics.			

The overall objective of improved water quality has not yet been achieved although the will project potentially contribute in the longer term. The objective was probably too ambitious within the lifespan of the project. The project has potentially contributed by putting forward plans for improved monitoring and by promoting the Water Framework Directive approach. But the Water Framework Directive is still far from being formally adopted. However, if at a later date the approach is consolidated and adopted by the regional water authority, this will lead to better prioritisation of the huge investments required in water treatment and preventative measures. In this way the project will have contributed to more water quality being achieved with the same investment level.

The project objective of greater capacity to manage the river basin has been partly achieved but not institutionalised. There is some anecdotal evidence that capacity has increased in terms of the insight of individuals, but this has not yet translated into greater institutional capacity.

The project result of the Southern Boog being administered in accordance with the Water Framework Directive has not been achieved. Until this result is achieved the higher objectives of improved water quality will not be met. Some steps have been taken to introduce the Water Framework Directive, but it is still is a long way off mainly due to the institutional and other constraints but also because the goal of adopting the framework is not internalised within the Ukrainian institutions. It is not the highest priority for them as they have many other urgent tasks of a fire fighting nature and cannot spare the resources for longer term initiatives, even though they will be of potential benefit and of great professional interest to key individuals.

In summary, the expected results and objectives are only partially achieved. The project does not appear to be a formal institutional priority of the partners, although

individual staff are enthusiastic and supportive. The project is advancing a concept that has not been institutionalised or fully understood. The ambition level in the formulation of objectives and results is also unrealistic given the time frame. There is merit in this for the long term but in the short term it means that the efficiency is low. This low efficiency has been further hampered by shortage of staff and skills both at the partner and in the on-site technical assistance delivered by SEPA.

2.1.3 Development of legal system and implementation of the IPPC Directive

Table 2.1.3 Project: Integrated permitting in Ukraine

Objectives/results /indicators (performance target)	Evidence of achievement	Problems encountered
To contribute to a reduction of the environmental impact of industrial pollution through improved regulation of industrial operations in the Republic of Ukraine and prepare Ukraine for an Association Agreement (AA) with the EU. (Overall objective)	Too early to draw meaningful conclusions on environmental impact effects. Environmental effects are influenced by many factors including a slow down in the economy following the financial crisis.	Varying levels of interest - IPPC has been promoted by external projects since 2003. Interest declined in 2006 due to change in personalities – it was taken up again under the SEPA project in 2009. Staff instability - Constant change of leadership and staff Institutionalisation – The project is not internalised as a priority in the workplans and budgets (tended to be additional work for already hard pressed staff) No clear decision to adopt IPPC – in part due to Association Agreement not being signed - this meant that the work was of a longer term preparation nature and thus less prioritised. Complexity and funding – the complexity of the changes and uncertainty in the level of costs reduced the commitment to pursue the IPPC route.
Strengthening of capacity at national level to improve the environmental permitting system to more effectively regulate polluting activities with a substantial impact on the environment and facilitate the implementation of legislation based on EU law principles on integrated environmental permitting. (Project objective)	No systematic capacity goals or means of monitoring capacity improvements has been put in place. Evidence of capacity increase related to the project includes: o Exposure to the concept and understanding of the methodology has taken place, e.g. through practical visits to factories in Sweden o Capacity has tended to be at the individual level and has not been institutionalised o The involvement of the private sector was successful and helped to bring in private sector support for IPPC which is crucial for the future	
1. Concrete proposals for minor amendments to Ukrainian permitting legislation furthering a transition from the current, fragmented approach to a Best Available Technologies (BAT)-based system of integrated permitting 2. Increased capacity for integrated permitting. 3. Tools to implement a system of BAT-based integrated permitting in Ukrainian environmental law (major amendments).	1) Concrete proposals made, including a draft action plan for adapting Ukrainian permitting legislation to EU- BAT based systems (not implemented but available for future use) – a step by step approach was used 2) Capacity – see above 3) Tools – BAT tools drafted The support provided was judged as high quality by the MENR. The project benefits from a Logical Framework Approach (LFA) and a well written and comprehensive completion report.	

Table 2.1.3 Project: Integrated permitting in Ukraine		
Objectives/results /indicators (performance target)	**Evidence of achievement**	**Problems encountered**
(the above results are also the indicators for 2013)		
Potential implications for future cooperation (ideas to be tested): • Capacity building is not well defined or measured – this can be improved upon. • It might be that enough is in place now and that future support for rolling out the IPPC should be dependent on a formal decision to adopt IPPC. • The involvement of the private sector (especially the large energy projects) has been successful and instrumental in creating a supportive environment for IPPC – future support should continue this outreach to the private sector. • In effect the project period was only 2 years (April 2011- June 2013) – future support would probably require a longer period.		

The overall objective of reducing environmental pollution has not yet been achieved and it would be too early to expect this to have occurred. The project design and the activities implemented in practice could potentially contribute to bringing about a significant reduction in pollution. However, a very high political commitment is required to implement these measures in the short term and this has not been in place due to wider factors.

The project objective of greater capacity in the public sector has been partially achieved but has been more limited than planned due to staff changes and difficulty in institutionalising the approach. The involvement of the private sector has been very successful and has led to a demand from highly influential energy and other companies whose support is needed to implement IPPC in the future. A systematic measurement of how capacity has been increased is not in place. There are indications that the project has contributed to changes in mindset and improved cooperation between the public and private sector e.g. the round table meetings are regular and engaging forums where important topics are discussed and viewpoints exchanged.

The results of regulatory proposals, capacity and tools have been largely achieved. Although these results have not led to implementation this is due to political and other factors beyond the scope of the project itself. The project has been implemented in a highly professional manner e.g. integrating development of tools with practical visits to factories in Sweden. The documentation is of very high quality.

In summary, the objectives and results of the project have been partially achieved. The project has contributed in a highly professional way to the development of IPPC in Ukraine, although implementation is still far from being achieved.

2.2 THE SSM PROGRAMME

The SSM Programme initially consisted of 4 projects as follows:

Budgets 2009 – 2013	**Budget**	**Expenditure as of end 2012**
SSM	SEK (m)	SEK (m)
1. Quality assurance and quality control in medical radiology (QA/QC)	7.23	4.10
2. Reduction of risks caused by exposure to radon gas and natural radiation	7.73	4.30
3. Uranium tailings and remediation planning in Ukraine, ENSURE (phase 2)	13.6	5.80
4. Radiation protection for workers at mining facilities (discontinued)	5.22	0.00
Total	**33.42**	**14.20**

Operationally the programme has been running for 4 years, so far 42% of the budget has been spent over 75% of the programme period. Correcting for the cancelled project, the expenditure is 50% over 75% of the time.

The project ”Radiation protection for workers at mining facilities”, the fourth project in the SSM programme portfolio, was terminated in 2012 due to a multitude of problems stemming from the lack of ownership on the part of the Ukrainian partners; disagreement between the Swedish and the Ukrainian sides about the public availability of data generated by the project, and exacerbated by indications that services and equipment were suggested to be purchased at heavily inflated prices, thereby alerting Sida to the potential of fraud.

2.2.1 Quality assurance and quality control in medical radiology (QA/QC)

Table 2.2.1 Project: Improvement of Quality Assurance and Quality Control in Medical Radiology, Phase 2			
Objectives	**Indicators**	**Evidence of achievement**	**Problems encountered**
Development Objective: To contribute to improved health of patients and staff in medical radiology.	Number of correct treatments and correct diagnosis increased by 10% by 2020 Number of retakes reduced by 11% by 2020; justified procedures makes 85% by 2020	The timeline for both indicators are such that evidence at this stage is not available. MoH states that data is being collected that will allow a verification in 2020.	Lack of project registration -resulted in failure to procure equipment timely. Staff had therefore not been trained in using the equipment at the time of the review. The new equipment was thought to lead to the elaboration of new methodologies that would then be laid out in new working regulations. Consequently, these had not come forward at the time of the review. Indicator design - It is not necessarily obvious how all of the indicators developed for the project can be linked to the
Immediate Objective Improved quality of radiological procedures.	1. Average age of equipment reduced to 15 years by 2018 2. The number of medical physicists or equivalent employed by Ukrainian hospitals is increased by 25% by 2018 3. Frequency and amount of quality control is increased by at least	1) The first indicator has not been achieved, due to a funding crisis in the public health sector that has an impact on the procurement of new equipment. 2) According to the Ministry of Health (MoH), the number of medical physicist employed by UA public hospitals has increased to 115 in 2012; overall,	

Table 2.2.1 Project: Improvement of Quality Assurance and Quality Control in Medical Radiology, Phase 2			
Objectives	**Indicators**	**Evidence of achievement**	**Problems encountered**
	20% by December 2013 compared with 2008	there are 153 medical physicists in UA; this figure includes those in the private sector. 3) According to MoH, this indicator has been achieved, but no specific evidence was at hand at the time of the review.	project activities, for example how improved QA/QC will lead to an increase in the employment of specialists in the state health secqtor.
Output 1: QA/QC Methodology	Recommendations on legislative basis for QA/QC submitted by the State Nuclear Regulatory Inspectorate of Ukraine (SNRIU) to MoH by December 2013 Proposal on regulations for QA/QC submitted for approval by MoH 31 December 2013; improved regulatory documents approved by SNRIU by 31 December 2013 Recommendations on methodological documents, including Dose Reference Levels approved by the MoH by 31 December 2011	Neither indicator has been achieved, because the equipment based on which the methodology was to be proposed for new regulations for QA/QC had not been procured in time.	Procurement - Lack of equipment resulting from late registration of the programme by the Ministry of Economy that is a precondition for tendering, procuring, and customs clearance of the equipment. Realism of reforms - Even if the proposals were being drafted, the MoH suggests that it will be very difficult to have them approved because of the ongoing reform in the public health sector resulting in considerable uncertainty of who would be in charge of introducing such regulations and at what level.
Output 2: Education and Capacity Development	1) 80% of involved medical staff at all hospitals has increased their knowledge by December 2013 2) Final version of proposal of curriculum for education of medical radiation physicists presented to Ministry of Education by 30 September 2013 3) 10 persons from SNRIU and MoH participated in trainings and/or study visits to Sweden and/or Belarus by December 2013 4) 150 persons (50 from regulatory authorities) participated in seminars on the implementation	1) Of the 153 specialists employed in 2013 in both public and private sectors, 80 had received training through the project at the time of the review, corresponding to over 50% overall. 2) This has been achieved. The curriculum has been approved and is being taught, since 9/2013, to 10 M.A. students at T. Shevchenko State University. 3) This has been achieved according to MoH. 4) According to the MoH, this has been fully achieved. 5) According to the MoH, this has been achieved.	Institutional memory - There is some lack of institutional memory on aspects of the project, including on the education and capacity output. The project seems to have worked consistently with specialists (as opposed to technical staff or nurses), which would seem reasonable, in particular as some skills and knowledge transfer to more junior staff has been built into the design. There are stakeholder statements claiming the project has worked with the wrong target group, a

Table 2.2.1 Project: Improvement of Quality Assurance and Quality Control in Medical Radiology, Phase 2			
Objectives	**Indicators**	**Evidence of achievement**	**Problems encountered**
	of the QA system by December 2013 5) At least 50% of participants in seminar on QA/QC held in 2009 – 2012 make presentation on their use of QA/QC 6) Requirements on knowledge of regulatory documents on QA/QC included in job description instruction for relevant positions by December 2012	This is a mandatory requirement for any specialists trained and serves as a transfer of knowledge mechanism. 6) As this relates to the new regulatory documents that were supposed to be produced under Output 1, this has not been achieved.	view that is not shared by the reviewers.
Output 3: Knowledge about management	1) Revised personnel load regulation approved by MoH by December 2011 2) List of type of equipment needed for QC at each hospital presented to MoH by December 2010 3) One set of equipment for QC measurement of Dose Reference Levels installed by December 2012, for the implementation of the project 4) Dose reference levels revised by 2012	1) According to the MoH, the personnel load regulations are being revised on a regular basis. However, personnel issues are a difficult topic because of the ongoing reform in the public health system. It is not entirely clear how the indicator links to the project activities. 2) According to MoH, this indicator was abandoned. 3) Not achieved because no equipment had been purchased at the time of the review. 4) Not achieved because of delays in procurement of equipment.	Delays due to reform uncertainties and procurement bottlenecks - Indicators have not been achieved because a) the overall uncertainty surrounding the ongoing reform in the public health sector and b) no equipment was purchased.

The overall objective to contribute to improved health of patients and staff cannot be confirmed due to lack of evidence. The indicators to measure the achievement take a long-term perspective (2020). It may be assumed that a contribution towards achieving the overall objectives has been made through training of a substantial number of specialists in QA/QC, but this should be verified in the future.

The (immediate) project objective of "improved quality of radiological procedures" has been partially achieved. 80 of currently 153 specialists in both the public and the private health sectors have been trained at centres of excellence in Belarus and Sweden. While capacity building and training did not extend to applied training on state-of-the-art, specifically procured equipment, a contribution to improved quality of the procedures has been made through the training offered to specialists.

The results expected have been partially achieved. The results are tangible at the level of specialists involved in the training and capacity building, as well as through institutionalising training modules at one of Ukraine's leading universities, which will allow for specialists to be educated in-country. Results are not yet in place in terms of equipment purchased, nor on the level of systemic reforms.

In summary, the objectives and results have been partially achieved. The project has suffered considerable challenges due to the failure of the Ukrainian partners to register the project and facilitate the procurement of the necessary equipment. Because of external circumstances, specifically the ongoing reform of the public health sector which hinders work on institutionalising new methodologies and regulations, the project has only partially achieved capacity building of specialists and advanced the quality of education in the field through a new university module.

2.2.2 Reduction of risks caused by exposure to radon gas and natural radiation, phase 2

Table 2.2.2 Project: Reduction of risks caused by exposure to radon gas and natural radiation, phase 2

Objectives	Indicators	Evidence of achievement	Problems encountered
Development Objective To contribute to the development and implementation of the national strategy for protection of population exposed to radon gas and natural radiation, in harmonisation with EU directives and international recommendations	Existence of an effective national strategy for protection of population exposed to radon gas and natural radiation Degree of harmonisation of this national strategy with EU and international directives	This objective had not been achieved at the time of the review. A "Concept"—a pre-stage for a full-fledged national strategy—was elaborated by the project, which is now pending review and approval in the Ukrainian Cabinet of Ministers.	<u>Trainee selection-</u> Skills transferred by the project not applied by Ukrainian counterparts, possibly because of not selecting the right level of participants. <u>Procurement</u> - procurement of necessary equipment delayed because of the lack of registration in the Ministry of Education; difficulties to coordinate project activities among institutional stakeholders on UA side; frequent changeover of project manager on SSM side.
Immediate Objective To enhance competence and capacity of responsible agencies and organisations to perform risk assessments, radon remediation and public communication	No indicators were developed for this objective	The review concludes that this has not been achieved on any significant scale.	
Output 1 Radon remediation book for Ukraine published by the end of 2010, comparable with Swedish Radon Book	Radon remediation book published by end 2010	This has not been achieved in this form, as copyright issues prevented an adaptation of the Swedish Radon Book to the Ukrainian context. THE SSM Radon book which had been translated into Russian previously has been distributed among Ukrainian stakeholders.	
Output 2 Regional pilot training packages (to be identified) on radon and	Number of regional Pilot Training packages on radon and	Achieved - training packages were designed	

Table 2.2.2 Project: Reduction of risks caused by exposure to radon gas and natural radiation, phase 2			
Objectives	**Indicators**	**Evidence of achievement**	**Problems encountered**
radon remediation for SES radiation officers and local authorities designed and implemented by the end of 2010	radon remediation produced by project by end 2010	and piloted for a total of 40 participants.	
Output 3 Complete radon map developed for the pilot region by the end of 2011 with experience gained from Sweden	Radon map for pilot region by June 2012	Not achieved in this form: a radon map was produced for Savran' pilot region, but with considerable involvement by a Swedish consultancy firm. 4 individuals have received training on radon mapping, but stakeholders convincingly suggest that it is unlikely that they will be able to produce a radon map on their own by the end of the project. The reviewers are unable to assess whether 4 experts trained in radon mapping would represent a critical mass.	
Output 4 Procurement of 1-2 sets of equipment for measuring radon in soil and in-situ gamma spectrometer by the end of 2012	1-2 sets of equipment for measuring radon in soil and in-situ gamma spectrometers	At the time of the review, this had not been achieved as a result of the severe delay in the registration of the project on the Ukrainian side.	
Output 5 Participation of Swedish/Ukrainian experts in national or international radon conferences (1 per year)	Participation at a minimum of 1 national or international radon conference per year	Achieved.	
Output 6 Technical input and co-authorship of scientific and technical publications and papers	Publication of a minimum of 1 technical and scientific publication co-authored with project funding	According to stakeholders, this has been achieved.	
Output 7 Publication of brochures and video material	3 brochures (water, remediation, general) and 1 video produced by 4Q 2012	This was cancelled because of copyright issues that had not been foreseen at project identification.	

The overall objective of the project to contribute to a national strategy radon gas and natural radiation has not been achieved. However, a potential contribution has been made through the submission of a concept on a possible national strategy. Further progress towards the objective would depend on the Ukrainian authorities demonstrating their willingness to start with the elaboration of a strategy.

The immediate (specific) project objective on enhancing competence and capacity of responsible agencies cannot be confirmed as it has not been monitored through specific indicators. The review concludes that this objective might have been achieved to a very limited extent through participation in the pilot trainings which have increased capacity at the level of individual training participants; however, there has not been a tangible change in the institutional capacity of the responsible agencies as far as the review can ascertain. The capacity to map radon has not been built; neither have the capacities to perform radon remediation.

The results of the project have been partially achieved. The development of the pilot training package has the potential to be rolled out in future, pending the availability of funding.

In summary, the project has partially achieved its aims and made a potential contribution to a future national radon strategy, and has produced training material that could deliver training on a more substantial scale to specialists as well as generalists.

2.2.3 Uranium Tailings and Remediation Planning in Ukraine, Phase 2

Table 2.2.3 Project: Uranium Tailings and Remediation planning in Ukraine, phase 2

Objectives	Indicators	Evidence of achievement	Problems encountered
Development Objective Contribute to the National Strategy in developing a remediation strategy for rehabilitation of legacy sites from past uranium mining and milling	Existence of national strategy for remediation of legacy sites	This has been achieved: there is a National Strategy in place, which is being regularly updated; the project had contributed to informing the next National Strategy, the ”State Remediation Programme of Ukraine”, which is currently being elaborated and which will span the time period from 2015 – 2020.	
Immediate Objective To improve Ukrainian national stakeholders competences and awareness related to the risks from past uranium milling and mining activities	Ukrainian agencies and authorities able to lead consultative process of updating and developing regulations, rules, criteria and limits	The achievement of the immediate objective cannot yet, be assessed. If the UA authorities decide to utilise the outputs of the project, the objective will have been achieved.	
Output 1 A set of regulatory recommendations for harmonisation with EU Directives and international recommendations developed. A set of recommendations for a site specific remediation	Complete set of harmonised recommendations by December 2011. A set of site specific requirements, criteria and limits by December 2011	Achieved. The project has elaborated a comprehensive set of recommendations in line with international standards and EU Directives that can feed into the new, 2015-2020, State Remediation Programme of Ukraine, which is currently under elaboration.	Partner commitment - Stakeholders stated that the UA authorities have been less active in the process than initially foreseen.

Table 2.2.3 Project: Uranium Tailings and Remediation planning in Ukraine, phase 2			
Objectives	**Indicators**	**Evidence of achievement**	**Problems encountered**
license for the pilot project area developed			
Output 2 Methodological and scientific-technical support for optimisation and demonstration of safety, for humans and the environment, of the remediation activities developed	Scientific and technical basis for optimised and safe remediation activities developed by 2012	This has been achieved through the - Development of a model and risk assessment methodology; - Elaboration of safety assessments required for decision-making on remediation; - Piloting of safety assessments for a tailing and a contaminated building; - Development of a specification for monitoring requirements; - Support to a site-specific database.	Budget offsetting - Stakeholders stated that because of the availability of funding through the project, the responsible Ukrainian authorities were dis-incentivised to carry out their regular monitoring work, i.e. Sida funding allowed earmarked government funding to go elsewhere.
Output 3 Capacity development programme for responsible national agencies and organisations designed and implemented	A network of centres of excellence established and a sufficient number of staff trained by July 2013	No one in SSM or with in the partners can remember what ”networks of centres of excellence” refers to. A capacity development programme was designed and delivered to the responsible State Enterprise (SE) “Barrier”, which comprised the development of targeted training courses; the delivery of lectures to staff; and delivery of technical advice.	Administrative reform - creating uncertainty inside the organisation due to frequent change of leadership which also affects the uptake of the project outputs on capacity building.
Output 4 Improved stakeholder involvement in the regulatory decision-making process for implementation of remediation activities of uranium tailing.	Regulatory decision-making process based on stakeholder consultations developed by December 2013	A public consultation involving citizens and NGOs was piloted; relevant information is made public via website. There is uncertainty whether consultation is going to be repeated in future.	

The overall objective to “contribute to the National Strategy in developing a remediation strategy has been largely achieved, as the relevant Ukrainian authorities have been provided with the key tools to feed into the new, 2015 – 2020 National State Remediation Programme of Ukraine.

The (immediate) project objective, to improve Ukrainian national stakeholders competences and awareness activities has been largely achieved, but is dependent upon whether or not the responsible Ukrainian authorities decide to utilise the outputs produced under the project.

The result of the project in terms is a full set of draft regulations and guidelines in line with EU Directives and international standards as well as the transfer of knowledge to specialist staff in the responsible agencies has been largely achieved. An unintended result has been that the project temporary relieved the Ukrainian agencies' responsibility to conduct monitoring on the respective sites.

In summary, the project has partially achieved its results and objectives. It was successful at providing needed technical expertise; the changes at the systemic level fall outside the timeframe of the project, but it is likely that the regulatory package developed by the project will feed into the development of a new state programme. Civil society involvement was piloted, but there is uncertainty as to whether this will be repeated in the future. The objectives and results formulated were realistic.

3 Assessment of the evaluation questions related to programme performance

3.1 EVALUATION QUESTIONS RELATED TO PROGRAMME PERFORMANCE

3.1.1 How has the implementation of the SEPA and SSM programmes' evolved during 2010-2013?

A number of factors have affected the implementation of the SEPA and SSM programmes since the start of their implementation in 2010.

The two programmes were designed in 2009—at a time where the then Ukrainian government's priority was closer relations with the European Union. Both the SEPA and the SSM portfolio were demand-driven, and a response to the Ukrainian partners' wish for targeted co-operation in the specific project areas.

The strong initial ownership of the programmes changed with the 2010 presidential elections. The elections led to a re-orientation of the policy priorities of the new government, and Ukraine's relationship with the EU deteriorated. Co-operation projects with an EU reform agenda, including those implemented by SEPA and SSM, were affected. On the Ukrainian side, those who had been in charge of bringing the projects about were in many cases dismissed due to previous political affiliations and so were no longer the counterparts for SEPA and SSM. Projects had to be re-introduced to the Ukrainian partner institutions, and their rationale had to be re-negotiated.

The 2009 economic crisis significantly affected public sector performance and the effectiveness of SEPAs and SSMs main partners. During the crisis Ukraine's GDP fell by 15%, and which devalued the Ukrainian Hryvnia by 40%, resulted in an administrative reform that saw, in 2010 and 2011, up to 20% of civil servants being made redundant and many more reshuffled at all levels. This resulted in an increased dysfunctionality on the Ukrainian side; it meant that the projects in some cases lost continuity, as SEPA and SSM yet again lost "their" direct interlocutors for the specific projects. It also meant that civil servants became less pro-active and had less surplus resources to work outside of their strict day-to-day duties (such as, in many cases, technical co-operation projects).

At the same time, i.e. in 2009 and 2010, SSM and SEPA underwent institutional changes resulting in staff reductions and, as a consequence, less surplus capacities to engage in external cooperation. Where specific expertise had been in place prior to the restructuring, for example in the water sector (SEPA), the reforms left only limited in-house capacity that could be deployed to technical co-operation

projects. This has meant that in particular SEPA has had to recruit sector experts outside of the organisation to handle the projects.

A combination of factors changed the co-operation dynamics, in particular in the early phases of the projects; instead of the delivery of highly technical advice, the projects had to be renegotiated at a political level – something that neither SSM or SEPA has the experience nor the capacity to do. Projects suffered severe delays, and, in a number of cases, never started. Whilst in similar situations, i.e. where projects experience delays or even deadlocks, the Swedish embassy would bring its weight to bear, this was more difficult for the SEPA and SSM programmes in Ukraine, as they had been developed mainly at Sida HQ level, and formal administrative responsibility was only delegated to the embassy in Kiev in 2011. The fact that Sida and SSM/SEPA are institutional peer organisations means that the embassy intervenes on behalf of SSM or SEPA in reality only when this is requested by either institution.

Table 3.1 Timeline of major events related to the environmental programmes of cooperation

	Political and economic
2004	Orange Revolution – Sweden steps up its development cooperation with Ukraine to support emerging EU aspirations of new leadership
2004 – 2008	Swedish Co-operation Strategy with Ukraine
2005	EU-Ukraine Action Plan for the European Neighbourhood Policy
2009	Ukraine's economy is in deep crisis (GDP fell by 15%, currency devalued by 40%)
2009 – 2013	Current Swedish Strategy for Development Cooperation with Ukraine
2010	Presidential Elections in Ukraine; new President elected arrest of former PM Timoshenko and deterioration of EU-UA relations
2010-2011	Administrative reform is underway – new ministries and agencies are formed – a state of great uncertainty for all civil servants, both middle and top level
2010	The Coordination Bureau for European and Euroatlantic Integration was dissolved (it functioned over 2008-2010). A Presidential Coordination Centre for Economic Reforms was established the same year but without a clear European framework
2012	Initialisation of Association Agreement (AA) and Deep and Comprehensive Free Trade Agreement (DCFTA)
2013	Vilnius Summit – possible signing of the AA/ DCFTA (not signed)
2015	Presidential elections in Ukraine
	Cooperation SSM and SEPA
2004 – 2008	Programmes and projects are of the "partner driven" based on dialogue and response type**

2009/2010	Current SEPA and SSM programmes are being developed; programmes' nature has changed to become institutional cooperation (projects).
2009+	SEPA and SSM suffered reduced staff and less surplus for external cooperation
2011	Programme administration is decentralised to the Swedish Embassy in Kiev
	Environmental
2009	National Environmental Strategy and Action Plan (approved in 2010)
2009/10	Budget cuts in the Ministry as part of the administration reform
2011	All SBS funding is postponed due to the EU concerns over public finance management in Ukraine
2012	EU sectoral budget support (SBS) in the area of environmental policy for 2011-2015 is launched with only TA component being funded

3.1.2 What are the deficiencies and assumed reasons for these?

Three core problems can be observed which have a range of underlying causes:

Many of the projects within the programme are not given high priority by the Ukrainian partners in practice - despite the selection of relevant cooperation areas and the inclusion of the projects in the NEAP. A major reason is the shift in attitudes and priority given to integration with the EU since 2008/9 when the programme was prepared. This particularly affects the SEPA programme, where the main thrust is towards integration of environmental legislation and practice with the EU. The urgency and political imperative to hasten approximation to EU legislation has diminished considerably since the programme was designed. It should be noted that even if the outputs achieved by the projects are not immediately used due to changes in the demand, they are not necessarily lost as they can be made use of later – provided the outputs are suffiently well consolidated. SEPA in particular adopted a strategy to continue work on earlier agreed outputs even when the Ukrainian partners showed less interest in order to bring the outputs to a level where they could have a future value. An example of this is the IPPC process: historical attempts which were not consolidated could not be used, whereas the work under the SEPA project was taken to a stage where it would be likely to have a future value e.g. the IPPC directive is now included in national plans as it was developed to a state where this was feasible.

The absorption capacity of the Ukrainian partners is less than expected. The low prioritisation given to the programme tends, in turn, to reduce the absorption capacity as less resources and political capital are devoted to achieving programme objectives. One of the other major reasons for the reduced absorption capacity was the administrative reform of 2010 which disrupted government operations at a crucial period and left many of the partners with far fewer staff and a much smaller budget than before. The administrative reform was an opportunity to increase the productivity of the public sector which should have seen an increase in its absorption

capacity, but this has not been the case in practice. Not all the administrative reforms were fully implemented and not all were well conceived.

The delivery of technical assistance has not always been highly effective. Technical assistance delivery has been influenced by the low prioritisation and absorption capacity of the Ukrainian partners. Low ownership and capacity has contributed to poor coordination of technical assistance. It has been difficult for SEPA/SSM to provide resources on short notice, which has been further compounded by the rapidly changing demands and lack of longer term planning on use of TA. For some projects SEPA/SSM did not have in-house skills and a large percentage (over 50%) of the programme is outsourced to others. The lack of a physical presence of the SEPA/SSM team in Ukraine has led to a tendency to work by correspondence. This has resulted in inadequate communication between SEPA/SSM and their partners as well as an inability to react when the best opportunities for collaboration arose. Language barriers have further led to the development of a communication gap (lack of sufficient English language skills of the Ukrainian counterparts). The projects are not integrated into institutional workplans and budgets and the projects are not officially registered, which has meant that the technical assistance is not linked to formal institutional priorities. This is particularly the case for the SSM projects and the WFD project and less so for the environmental governance and IPPC projects. Not all activities need to be part of an institutional workp plan. There is also value in working beyond current plans – but not to the extent that for many projects the staff had to work outside working hours because the project was outside the official workplan.

Although there have been instances of assistance not being effective (from which much can be learned for the next phase) there are also, as documented elsewhere, instances where the technical assistance has been highly appreciated and highly effective. Within the SEPA programme, the support to NEAP and the initial support to approximation is an example of highly flexible, highly competent technical assistance. Within the SSM programme the same is true of the support to the Uranium tailings and remediation project.

Table 3.2 Core problems and underlying causes

Core problems observed	Underlying causes
Low prioritsation by Ukrainian partners (despite long preparation, selection of relevant cooperation areas, frequent policy dialogue)	• **EU-Ukraine relations**- (delays and varying signals on signing Association, Agreement) leads to low commitment and creates uncertainty • **Priority to environment** – according to some reports environment is not as strongly prioritized by EU or UA as other areas of cooperation – high adaptation costs by industry leads to opposition/hesitation • **Workplan integration** - Projects are not integrated into institutional workplans and budgets, projects are not officially registered • **Gap filling** - Misunderstanding that external projects should gap fill as they are well resourced (crowding out effect)
Low absorption capacity of Ukrainian partners	• **Economic crisis 2008/9** - leading to lower priorities for environment and budget constraints • **High ministry staff turnover** – because of the administrative reform which also led to institutional disruption

Core problems observed	Underlying causes
low (influenced by low prioritisation)	• **Non –disbursement of SBS -** Withdrawal of SBS funding due to Public Financial Management (PFM) problems, so planned implementation resources not in place* • **Civil service politicized** – leading to loss of professional motivation and in some cases less technically competent managerial staff • **Individualism** - Individuals act in the individual and not corporate role – the personal qualities of the project coordinators become disproportionately important for success or failure
TA delivery is not effective (influenced by low prioritization and absorption capacity)	• **Communication:** o Inadequate flow of information - reporting is infrequent between Sida, and SEPA, SSM o Lack of a physical presence – tendency to work by correspondence, inadequate communication between SEPA/SSM and their partners o Language barriers – leading to communication gap • **Workplan integration** - Projects are not integrated into institutional workplans and budgets, projects are not officially registered (the NEAP was an exception to this) • **Overlap of support projects**- with the EU TA project on approximation (although SEPA took many steps to ensure coordination) * • **TA coordination** - TA modality being too complex to administer by UA side; Low MENR capacity to coordinate TA (financial and human resources to do this not envisaged)* • **Inadequate TA delivery** – low availability of SEPA/SSM resources on short notice compounded by the rapidly changing demands and lack of longer term planning on use of TA

*only for SEPA

3.1.3 Was the choice of the intervention modalities appropriate and what risks are observed?

In the last ten years, experience has been gained from three different types of intervention modality. The first model operated during 2004-2008. It was a pure twinning-cooperation model where SEPA and SSM established a relationship (or in the case of SSM deepened an already existing relationship) and using funds from Sida pursued an agreed programme of cooperation that was not defined in terms of specific projects or logical frameworks. A second model was adopted for the second phase from 2009-2013. Under this model there was a shift towards a programme and project based-cooperation model. The programme of cooperation between SEPA and SSM and its partners was still conceived and formulated by SEPA and SSM and their partners based on results from the earlier phase. However, for the second phase each of the SEPA and SSM programmes were composed of a number of distinct projects with specific objectives and outputs and in most cases a developed log frame and elements of a results based framework. Finally during 2010, the EU used a third model that could be thought of as a "service contract" approach. Under this model, the EU programme of cooperation was developed by an independent consultancy team working closely with Ukrainian partners. The technical assistance element was then tendered out and a consortium of consultants was awarded a service contract to carry out the work. A summary of the pros, cons and risks of these 3 modalities are given below:

Table 3.3 Pros, cons and risks of different intervention models

Modality (example)	Pros	Cons	Risks
Pure Twinning (partner cooperation – 2004-8)	• Flexible for change in direction and provision of unplanned ad-hoc support • Strategic and policy level cooperation works well e.g. with the NEAP	• Cannot deliver substantial inputs over a longer time frame except by outsourcing	• If the national partner is weak the cooperation could collapse • Project reporting and management may not live up to Sida /donor requirements • Not all areas (especially on recent approximation) are within the skill or experience of Swedish institutions
Project based partner cooperation (2009-2013)	• Planned approach puts less demand on partner capacity to define needs (than pure twinning model)	• Stretches project management capacity of SEPA/SSM	
Service delivery contract (EU TA)	• Strong on delivery against project targets • Reporting likely to be good • A permanent team of senior staff can be established on location	• Inflexible as inputs are governed by a contract • Operational experience with multiple EU directives cannot realistically be mobilized • No or very small role of Sida/Swedish partners	• Cooperation in some areas such as radiation cannot be achieved with a service delivery model

Conclusions that can be drawn include:

- A service delivery contract modality is unlikely to be accepted for a sensitive area such as radiation.
- Key areas of cooperation, such as operational advice on implementation of EU directives, are delivered most effectively by SEPA as opposed to consultants or via service contracts.
- Experience on recent approximation will need to be provided either by consultants or through a 3 way twinning with agencies of other Eastern European countries that have recently undergone similar processes (if the right consultants can be engaged, this might be less cumbersome than involving a third party).
- Project management and results based reporting is likely to remain a weak point of SEPA/SSM because it is not their core skill area and the demands for results based reporting have significantly increased.

Different types of technical assistance are needed requiring both consultants and official partners such as SEPA/SSM. The choice is whether SEPA/SSM should be engaged to take on the overall responsibility and outsource where necessary or whether a group of consultants should take on the overall responsibility with SEPA/SSM playing a more specialist role e.g. delivery specific advice on implementation of EU directives.

Table 3.4 compares the options of SEPA taking on the lead project management role or consultants taking on this role and then outsourcing to SEPA. This is not as

relevant for SSM, as radiation is an area that requires a visible lead role by the national authority.

Table 3.4 Pros and cons of different options on lead role

Criteria	SEPA lead[1]	Consultant lead [2]	Comments
Project management performance			Consultant are generally better at project management but SEPA could improve project management if this was a long term corporate aim for their international cooperation
Official cooperation benefits from visible long term twinning			Some aspects of visibility of the official cooperation would be lowered if it is consultant led
Local permanent presence			More difficult for SEPA to establish a permanent presence (although could be done by outsourcing especially to local consultants)
Ease in sub-contracting relationship			It will be more difficult for SEPA to act as in a virtual "sub-consultant" role

[1] SEPA project management with outsourcing to consultants, [2] Consultant project management with outsourcing to SEPA

The pros and cons for a future programme led by SEPA are balanced. Much would depend on SEPA's objectives for future international cooperation. Possibly the best option would be for SEPA to assume the overall leadership but with improvement or even potential outsourcing of the project management (i.e. bringing in external project management in the form of a hired project manager, perhaps based in Ukraine).

Another issue that has been raised is the possibility of merging future Sida technical assistance to EU, Table 3.5 compares the options against criteria.

Table 3.5 Pros and cons of different options for financing of technical assistance

Criteria	Combine with EU	Separate Sida / EU	Comments
Ease of administration both for donors and partners			Supportive of the Paris Declaration. But there are concerns about timing – the split timing in the earlier phase meant that EU support benefitted much from a early start that was only possible by having a separate Sida programme.
Reduction of coordination burden (lessen overlap)			
Flexibility			These concerns are raised by the Ukrainian authorities. The capacity to provide support across all areas refers to the EU directives which tend to be skills areas that are mainly in the public sector and not easy to outsource to consultants (which is the default for EU led TA).
Capacity to provide quality support across all areas			
Minimization of risk of delay in one donor affects the other			

Benefitting from EU policy influence and incentives to cooperate			This benefit can also be obtained perhaps to a lesser degree by separate programmes.

The clear preference from the Ukrainian side was to have a separate Sida programme. Even through the advantages of a combined approach was appreciated, it was felt that it would be less flexible and more risky to combine the technical assistance in one joint EU/Sida project.

3.1.4 What is the absorptive capacity of the Ukrainian partners and their motivation / incentives for reforms

The absorption capacity of the Ukrainian partners has substantially reduced since the time that the programme was designed in 2008/9, mainly because there have been staff and budget cuts and because senior staff have been changed (table 3.2 outlines more details). It would not be an exaggeration to say that the combined effects have led to a capacity that is less than 50% of the level in 2008/9.

Political support for the programmes has reduced the effective absorption capacity. The greatest single factor in absorption capacity for the SEPA programme has been the reduced political commitment to the core objective of approximation to EU directives on environment. This has meant that the incentive to undertake difficult reforms has been much reduced. The political good will is not present and senior staff are not being instructed or encouraged to vigorously pursue early achievement of approximation.

The SEPA and SSM programmes are not institutionalised in the workplans and budgets. For the most part the programmes are an add-on, i.e. something that is done in addition to the official workload rather than something that is structured to help with achieving the official mandate. The projects rely on the charisma of the technical assistance and the enthusiasm of officials to work beyond normal working hours.

P**oor performance in public financial management greatly reduced the absorption capacity** and in some cases, especially under the SSM programme, these problems brought the projects to a standstill. This was also a factor in the SEPA programme as it was the overall cause for delayed release of sector budget support.

The motivation for reforms arises from: i) internal political pressure to follow an Association Agreement pathway; ii) public opinion; iii) business interests and iv) incentives such as the sector budget support finance. Where these factors combine, progress is likely. In the period 2009-2013, public opinion and business interests have been the most robust forces working towards reforms. Internal political pressure has reduced. The incentives and conditionalities of sector budget support have had some initial impact but with the delay in transfer of budget support their impact is lessened.

3.1.5 Have anticorruption and gender considerations affected implementation?

Corruption is an ongoing concern in the delivery of cooperation programmes in Ukraine. Corruption *risks* are present at all stages of project implementation—be it at

the level of the procurement of goods and services (for inflated prices) or at the point where a governmental interlocutor takes decisions on who to nominate for participation in study trips abroad. Sida has been alert to the problem, and has made sure that both SSM and SEPA are aware of the Sida's Anti-corruption Policy from the start of the programmes (see for example the Sida-SSM Programme Agreement of 28 January 2010, paragraph 10, which deals specifically with corruption).

The possibility of losing funds to corruption in one of the four SSM projects led to its early discontinuation. Procurement of equipment is an ongoing concern.

Selection of staff for training has been a problematic area of cooperation. Another specific area is the Ukrainian counterparts' discretion of who to send to trainings, conferences and study tours abroad. At least in one case, there were serious questions on the choice of participants chosen to go on a study tour to Sweden. A direct unintended (and harmful) result is that training participants upon their return from Sweden initiated actions that led to a deterioration (and not improvement) in the levels of radiation in one of the pilot locations—it is now clear that these participants were not at the right level of specialisation to initiate such actions in the first place, and that the training should have benefitted a different target group. The challenge is how to best ensure the most suitable level of participant while retaining some level of ownership of decisions on the Ukrainian side. This type of corruption is not substantial in monetary terms—the official in charge of allocating places is unlikely to enrich him/herself through this. Yet, ways need to be found to ensure that trainings benefit the right target group, and are not abused to become perks for civil servants that have little or limited use for the training on offer.

Gender considerations have been incorporated into the project design, and SSM has reported on gender issues in their annual reports – SEPA less so. Gender equality for the Ukrainian context was not perceived by the parties involved (SEPA/SSM or national partners) to be an area of immediate concern (it can be in other countries of the region). SSM analysed the gender balance for their projects in that at the level of the institutions and decision makers that they were dealing with, women were in the majority, while for the industrial sites there was a majority of men. In terms of implementation, SSM reports broadly equal participation in trainings and study tours; but annual reports did not really present specific gender-disaggregated data (possibly a combination of this not being requested and the fact that gender equality is perceived to be less of an issue).

3.1.6 What is the progress of Ukraine by way of implementation of the Action Plan for the Ukraine-EU Association?

Environmental Policy

Environmental protection is a low policy priority for government as the domestic push for reforms in the area is moderate. Explanatory factors include:

1) The low income level of households (annual GDP per capita is about USD 4 000). Ukraine is still recovering from 2008-2009 economic crisis with output and income still not reaching the pre-crisis level.

2) The population is not convinced that higher environmental prices/taxes will lead to a cleaner environment. The public tends to have low level of trust in the government institutions, which is largely explained by weak public sector accountability and insufficient transparency. This makes it difficult to introduce cost-recovery water/energy/waste collection prices and phase out the fossil fuel subsidies/promote renewable energy.

3) High mitigation costs. Ukraine is a big polluter given the energy and resource intensive structure of its economy. A large share of companies, especially in the energy, water and waste treatment sectors, are owned by the state or municipalities, which have very limited human and financial resources. Private companies (mostly domestic investors) also have difficulties accessing capital markets and have no proper prior experience of compliance with environmental regulations.

Ukraine's environmental performance appears to be driven more by the country's economic cycle (growth/recession) than by environmental policy. Much of the important legislation has been developed recently and since it tends to have long implementation periods, no immediate effects on the quality of environment are to be expected. Law enforcement continues to be weak. Furthermore, monitoring is difficult as the available environmental data is either poor in terms of its quality and coverage (this was one of the reasons why Ukraine was suspended from trading emission units within the Kyoto). Public access to some sensitive information is limited, though this is changing for the better.

EU-Ukraine cooperation priorities in the area of environmental policy

There are a number of fora through which the EU cooperates with Ukraine in the area of environmental policy. The EU-Ukraine Association Agenda (AA) is a major document, which sets priorities for bilateral cooperation. Once signed, the AA becomes a major framework for the Europeanisation of Ukraine's policy making. Other important framework agreements that anchor Ukraine's environmental policy with the EU priorities are the European Energy Community and a number of International environmental conventions that Ukraine is ratifying or has already ratified.

Table 3.6 EU-Ukraine Association Agenda cooperation priorities

The 2013 version of the Association Agenda sets the following priority cooperation areas[3]:

- development, adoption and implementation by Ukraine of the National Environment Strategy for the period till 2020 and the National Environment Action Plan for 2009-2012 in order to be able to take measures to implement budgetary support;
- strengthening of the administrative capacity at national, regional and local levels, including through development of effective inspection and enforcement capacities;
- further development and implementation of Ukrainian environmental legislation, strategies and plans, in particular on environmental impact assessment, strategic environmental assessment, access to environmental information, and public participation;
- development of national implementation instruments in line with multilateral environment agreements signed and ratified by Ukraine and the European Community, as enlisted in the Annex;
- implementing the Kyoto Protocol through a dialogue within the Joint EU-Ukraine Working Group on Climate Change on a new post 2012 agreement on climate change, on eligibility criteria for using the Kyoto mechanisms, and on developing measures to mitigate and adapt to climate change;
- active participation in the Danube-Black Sea Task Force, including to promote the implementation of the Mykolaiv project;
- working together to implement the roadmaps for achieving the water-related Millennium Development Goals and Integrated Water Resources Management targets, using the national policy dialogue under the EU Water Initiative;
- promoting the implementation of the Bucharest Convention and its Protocols and working together with the Parties of this Convention to promote the accession of the European Community to the Convention;
- exploring the participation of Ukraine in selected European Environment Agency activities on information collection and dissemination;
- establishing the REC-Ukraine, inter alia to raise environmental awareness and promote the role of the civil society on environmental matters.
- the Parties will consider establishing a high-level dialogue on environment protection issues.

Progress in fulfilling the AA agenda in environmental policy

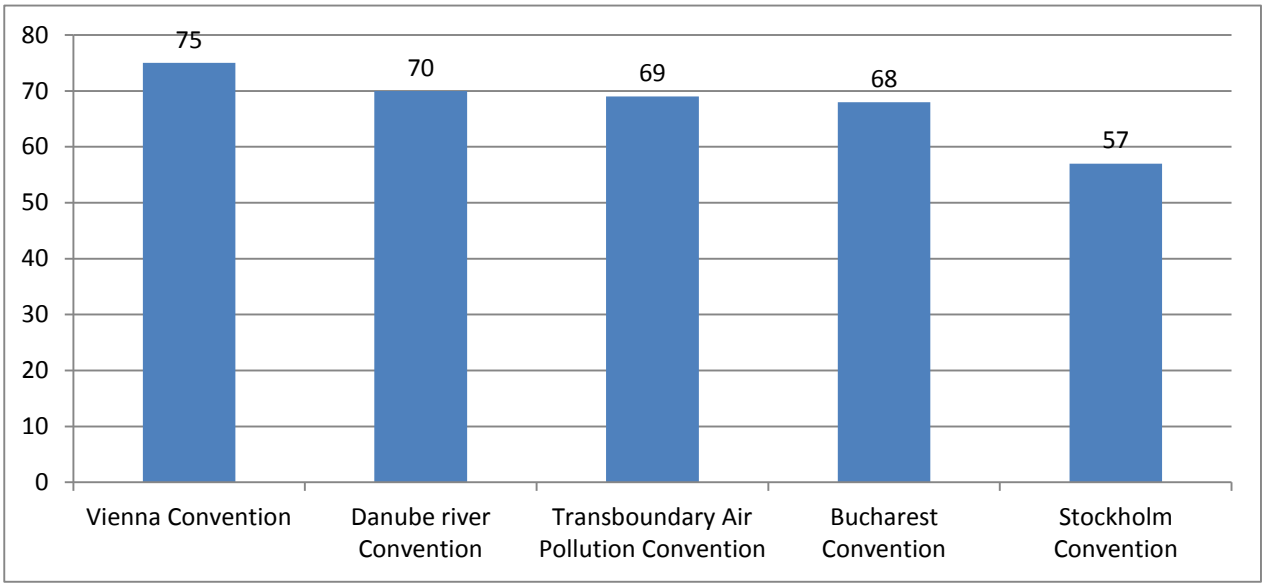
According to the civil society monitoring report[4], only about 50% of the EU-Ukraine Association Agenda in the area of environmental policy has been fulfilled by the beginning of 2013. The areas in which Ukraine received higher than average marks are the protection of the ozone layer, long range transboundary air pollution, and on the protection of the Black Sea (see Graph 1). High implementation level of some conventions is primarily explained by the ratification status: where

[3] The EU-Ukraine Cooperation Council endorsed the updated version of the EU-Ukraine Association Agenda on 24 June 2013. http://eeas.europa.eu/ukraine/docs/eu_ukr_ass_agenda_24jun2013.pdf

[4] Assessment of the Environmental Component of the EU-Ukraine Bilateral Cooperation (2013). Available at: http://www.eap-csf.eu/assets/files/Documents/Monito_eng.pdf

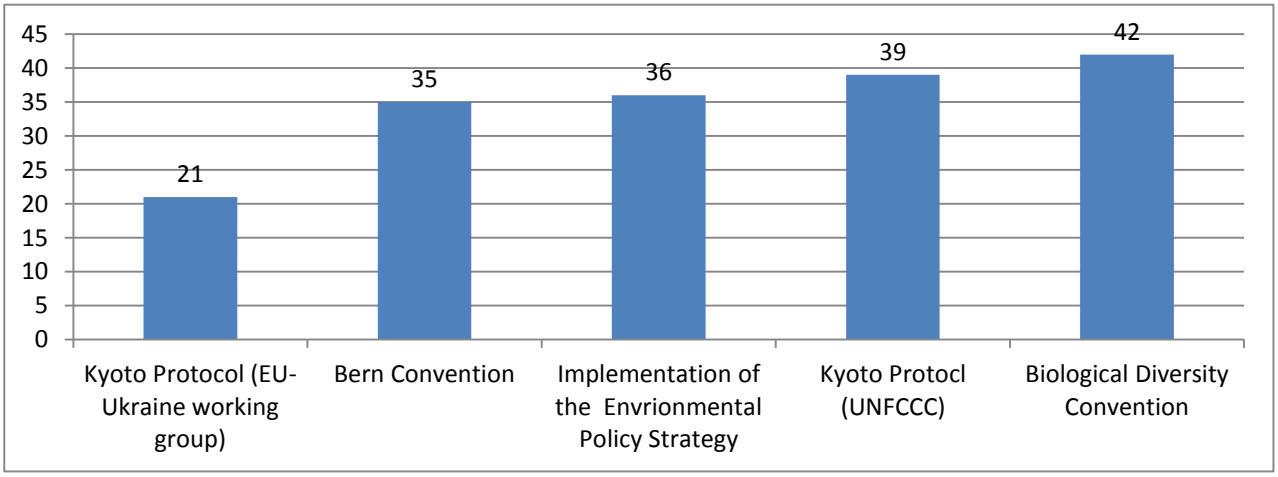
ratification was pending, Ukraine got low marks. However, even ratified conventions are not enforced (e.g., the Stockholm Convention) and as result Ukraine ends up facing sanctions (e.g. suspension under the Kyoto Protocol).

Figure 3.1 Top-5 areas of AA agenda implementation, % compliance



The adoption of the Environmental Policy Strategy has not yet resulted in intersectoral cooperation: environmental policy continues to be not reflected in sectoral and regional strategies. Some progress, however, has been achieved in the area of legal approximation: namely, Ukraine has developed the Basic plan for convergence of its environmental legislation with the European standards. This has become possible through the assistance of the EU Sector Budget Support (SBS) programme and Sida project. The areas of EU-Ukraine cooperation that have got below than average marks are the implementation of the Kyoto Protocol, conservation of wildlife and implementation of the National Environmental Policy Strategy and National Environmental Action Plan (See figure 3.2).

Figure 3.2 Bottom-5 areas of AA agenda implementation % compliance



According to the EC report on the European Neighbourhood Policy implementation progress[5], there were the notable developments in the area of environmental policy in Ukraine over 2012:

In the area of the climate change mitigation:

- Suspension imposed on Ukraine to trade emission units under Kyoto Protocol was lifted
- Development of national greenhouse emissions trading scheme is discussed
- Ukraine participated in the preparations for the EU Clima East Project
- Ukraine is expected to develop new carbon market mechanism within UNFCC
- Ukraine still has to fully implement Cancun and Durban and agreement's (devising low carbon development strategy)

In the area of developing and implementing National environmental strategy:

- Water management program to 2021 adopted
- The legal approximation plan for the environmental acquis was approved
- Ukraine continued consultations on its non-compliance with Aarhus and Espoo conventions
- Ukraine signed the Charter for Regional Environmental Centre for Central and Eastern Europe, enabling a regional branch to be established.
- Further steps have to be made to strengthen legislation and administrative capacity to develop procedures for environmental impact assessment and public participation

EU technical assistance

Ukraine was required to implement its Environmental strategy in response to the sector budget support (SBS). The Environmental strategy is generally commended as adequate by the civil society. To a significant extent the environment sector, despite strong cuts in staff and resources has performed reasonably, attaining around 70% of the required level in 2011 and 50% in 2012.

Table 3.7 Status of attainment of SPSP-Environment Performance Indicators

Indicator	Title	MENR reports		TA Project Report for 2011
		2011	2012 (draft)	
1	Development and / or update and approval of sector and regional programs	Fulfilled	Fulfilled	Partially fulfilled
2	Design and adoption of a harmonization plan towards the EU *acquis* ("Basic Approximation Plan" or BAP) that approximates legislation of Ukraine to EU laws, adoption of Directives	Partially fulfilled	Not fulfilled	Partially fulfilled

[5] The EU progress report: Implementation of the ENP in Ukraine: Progress in 2012 and recommendations for action. Available at: http://ec.europa.eu/world/enp/docs/2013_enp_pack/2013_progress_report_ukraine_en.pdf

	85/337/EEC; 97/11/EEC; 2003/35/EC; 2001/42/EC; 2003/4/EC and 2003/35/EC and drafting the report of their adoption			
3	Simplification of environmental authorization system	Partially fulfilled	Partially fulfilled	Partially fulfilled
4	Strengthen the MENR capacity to carry out environmental monitoring on a yearly basis	Not fulfilled	Not fulfilled	Not fulfilled
5	Improvement of access to environmental information, ensuring citizen's participation in the decision-making and enhancing the environmental education / awareness	Partially fulfilled	Fulfilled	Partially fulfilled
6	Stabilization of emissions of pollutants and greenhouse emissions in the air produced by the stationary pollution source in the power plants	Fulfilled	To be determined	Fulfilled
7	Improvement of the quality of surface water bodies due to better performance and the modernization of the water treatment facilities	Fulfilled	To be determined	Fulfilled
8	Modernizing the waste treatment infrastructure in Ukraine	Fulfilled	To be determined	Fulfilled
9	Expanding natural habitats of flora and fauna representatives	Fulfilled	Not fulfilled	Fulfilled

Source: Mid-Term Evaluation of the EU support to the implementation of the National Environmental Policy of Ukraine, June 2013

All SBS funding was put on hold since December 2011 because of the EU concerns over public finance management (PFM) in Ukraine. The withholding of SBS funds has reduced the capacity of the MENR to implement its national strategy. The EU Delegation is likely to resume SBS since the Public Finance Management Strategy to 2017 has been adopted by Ukraine in 2013[6] as was required by the EU.

Major deficiency areas

Wide gap between legal approximation requirements and administrative capacity - The National Environmental Strategy (NES) and its Action Plan are as comprehensive and ambitious as the AA chapter on environment, which includes 31 *acquis*. Therefore, the first point of the EU-Ukraine AA agenda dealing with national environmental strategy is likely to be the most difficult for Ukraine to implement. This is especially so, since the administrative reform weakened the political and administrative capacity of MENR[7]. Among other things, the line ministry had to give up its regional branches and the mandate for some functions (e.g., environmental monitoring). Some of these decisions were acknowledged as wrong and are now being reversed. The 2010 assessment results, indicating that MENR has significant capacity constraints to implement the AA, continue to hold true[8].

[6] See the text in Ukrainian: http://zakon2.rada.gov.ua/laws/show/774-2013-%D1%80
[7] See the Mid-Term Evaluation of the EU support to the implementation of the National Environmental Policy of Ukraine, June 2013.
[8]See ICPS (2010), Capacity assessment of the Government to organize implementation of the EU-Ukraine Association Agreement. Available at: http://icps.com.ua/pub/files/57/50/SIDA_2010_ENG.pdf

Figure 3.3. Aggregate scores of MENR capacity to prepare and implement AA, %

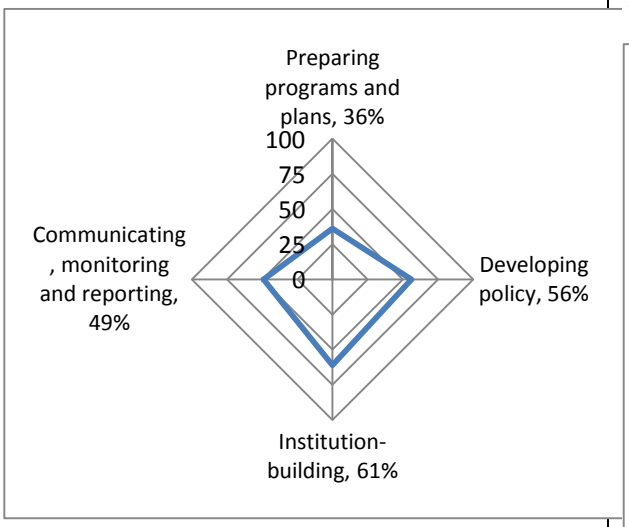
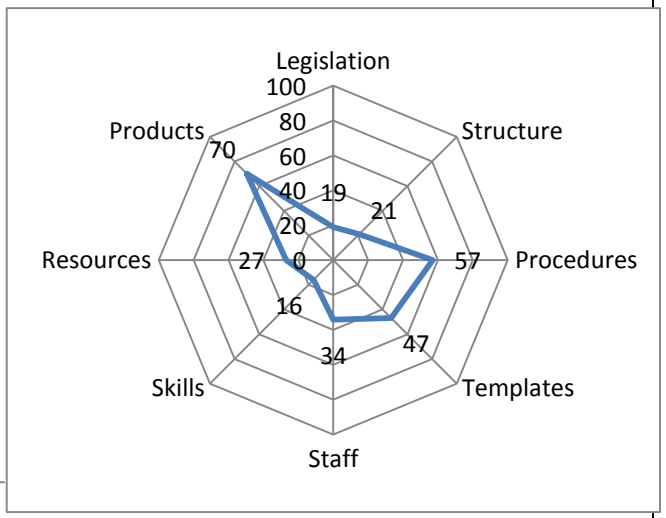


Figure 3.4: Scores of MENR capacity to prepare programs and plans, related to European integration, %



Source: ICPS (2010), Capacity assessment of the Government to organize implementation of the EU-Ukraine Association Agreement.

Association Agreement (AA) is not acting as a sufficient anchor for reforms in practice - Since 2010 significant uncertainty remains with regard to the perspective the AA being signed and ratified. Ukraine has therefore not committed any serious administrative, financial or political resources to preparation for the AA, and the impetus for more cohesive and confident transposition of the EU *acquis* in Ukraine has not been in place. Environment and energy are relatively well prepared for transposition of the EU *acquis* (compared to other policy areas), mostly because of a significant EU assistance since 1990s.

However, the fact of having a legal framework for reforms such as the AA does not seem to be sufficient. Implementation of the European Energy Community Treaty (ECoT) by Ukraine illustrates this well. Ukraine has become ECoT member of 2011, which has meant an important (binding) commitment for Ukraine in such important areas as Environmental Impact Assessment (EIA) and Large Combustion Plant Directive. Though this had some positive implications (greater public awareness, engagement of stakeholders in consultations, and the development of the by-laws), it also became evident that government and the private sector's capacity to perform are quite low. Ukraine is failing its ECoT commitments by not meeting the legal transposition deadlines. Similarly, a number of ratified international environmental conventions are still not enforced.

There are significant financial constraints - Another reason behind slow progress with AA agenda implementation is that Ukraine is short of funds. Approximation to the EU environmental *acquis* is costly: the accession countries spend many billion euros (with the European Commission covering a significant share of these costs). Even after signing the AA, Ukraine does not a guaranteed access to EU funds, while

its absorption capacity for EU assistance remains low as the EU SBS implementation indicates.

The government also does not seem to be ready to place the burden of improving environmental standards on businesses and households. Though the government increased somewhat the fines for environmental pollution over 2012-2013, this decision had clear fiscal motivation; public expenditures on environmental protection have not grown proportionally. Ukraine is failing to phase out fossil fuel subsidies, which imposes significant fiscal constraints: among other things, it makes it difficult to sustain feed-in tariffs for renewable energy.

Major reforms are on hold - The mixed results of the country's reform agenda implementation over 2010-2012 put certain limits on environmental policy development. Many of the economic reforms with important implications for the state of environment have not proceeded as planned: energy reform (increasing energy efficiency, stimulating renewable energy development, cost-recovery pricing), financial sector reform, tax reform and social policy. Some reforms, such as the administrative reform, severely disrupted policy making process. The coming presidential elections in 2015 seem to be one of the major reasons behind weak motivation of the Government to resume reforms.

Business interests come first- When facing a dilemma between improving business environment and environmental protection, government tends to choose the first priority. In order to improve Ukraine's standing in the World Bank Doing Business ranking, Ukraine has simplified construction permits, and in particular, the environmental expertise, a procedure similar to EIA, was cancelled. For example, according to Ukraine's environmental Non-Government Organisations (NGOs), the government has not held proper public consultations or made an EIA of the non-conventional gas extraction (using hydraulic fracking). The representatives of Shell, which has started the exploration drilling, indicated, however, that the company would voluntarily make the EIA study.

Such prioritisation can sometimes make sense; some of the environmental regulations can only be enforced once a certain energy market design is in place (especially in climate change mitigation). For example, the ECoT timeline for Ukraine reflects this reform sequencing; introducing a proper energy market design and increasing regulatory capacity precedes the implementation of the financially costly large combustion plant directive.

3.2 SUMMARY OF PROGRAMME PERFORMANCE AGAINST THE DAC CRITERIA

Relevance

The SEPA programme is responsive to the NEAP and the need to improve environmental performance in Ukraine. The programme aims mainly at approximation to EU environmental practice which will in the longer term bring

about substantial and much needed environmental improvements. In turn these will create opportunities for Ukraine to transition to an inclusive green economy (e.g. making better use of water resources), improve the sustainability of economic growth (e.g. by ensuring that Ukrainian goods and services are in line with the environmental standards of key export markets) and contribute to health and social well-being (e.g. reducing the debilitating effects of water, air and soil pollution that its population is today exposed to).

The immediate relevance of the programme from a shorter term political perspective has rapidly declined since 2009. The programme and its projects are no longer treated as a political priority for the government. This has reduced the apparent relevance of the programme and therefore also the engagement of the Ukrainian authorities. With the failure to sign the AA in late November in Vilnius this unfortunate situation can be expected to prevail.

Effectiveness

Measured by attainment of objectives, the programme has not been fully effective. Project objectives have not been achieved and are unlikely to be achieved by the end of the programme. The objectives are too ambitious to be achieved in the programme time frame even in a favourable political context. In practice there was an unfavourable political context and unexpected disruption caused by the administrative reforms. These factors further reduced the prospects of meeting objectives because even when results such as detailed plans for approximation and administrative orders for implementing the plans were put forward they were not implemented and used in practice.

The programme has been reasonably effective, measured by attainment of results, given the circumstances. The more narrow results in terms of studies, plans and analysis were largely achieved for the environmental governance and IPPC projects. By the reckoning of the EU, the results for 2011 were at 70% attainment level and a 50% attainment level for 2012. Of the three projects examined in detail, the Southern Boog water project achieved the least results compared to expectations due to a number of reasons including over optimism in the project design on the data available.

Efficiency

The programme has not been efficient partly due to external factors beyond the control of the immediate project partners. These factors include the declining political support for implementing the original objectives, the debilitating effects of the administrative reform and budget cuts. As a result, technical assistance was not used efficiently. Studies and analysis were done but did not lead to implementation or have the intended influence on decision making.

Internal factors under the control of Ukrainian and Swedish partners have also led to inefficiency. These factors include various constraints in the delivery of technical assistance including: language constraints and the non-availability at short

notice of the relevant technical assistance skills as well as unfortunate illness and delay (mostly in the case of the Southern Boog project) and above all the absence of a constant presence in Ukraine which led to communication gaps. There were also constraints in making good use of technical assistance by the Ukrainian partners such as changes in staff that necessitated re-training and gave rising to discontinuity in support. There was also an earlier failure to integrate the projects into the workplans and budgets of the implementing organisations.

Sustainability

There are few physical improvements to sustain, capacity is likely to be sustained but mainly at the individual level. The approach adopted of changing legislation and combining this with capacity building is well conceived. But, it is only once the approximation measures are implemented and put in practice that will there be substantial environmental improvements that will need to be sustained. Some of the capacity built is likely to be sustained at least in the form of individual capacity e.g. staff in the Southern Boog project are likely to continue to have a greater insight and appreciation of the wider environmental aspects of water management and to appreciate the methodologies behind the water framework directive. If there is continuity of staffing and they are not changed as they have been in the past, the individual capacity built up will also be available for future efforts. Together with the training manuals, reports and other procedures and systems built up, this greater capacity at the individual level will also represent a wider institutional capacity that can be expected to remain for some years to come.

Impact

The impact in terms of physical environmental improvement is not evident, some capacity impact is evident. It is too early to expect a physical environmental impact. However, some capacity impact is evident. Individuals have a better understanding of how EU approaches to environmental governance and management could be implemented in Ukraine. There are procedures, manuals and systems available that could be useful in the future. The cooperation and coordination between the public sector, the private sector and civil society has noticeable improved within the environmental sphere (all parties are regularly engaging the round table and thematic discussions meetings).

3.2.1 Summary assessment of SSM programme according to OECD/DAC evaluation criteria

Relevance

All three projects set objectives at the level of systemic changes in Ukraine in their specific area. Two of the three ongoing SSM projects (Uranium Tailings and Remediation Planning in Ukraine, Phase 2; and Reduction of Risks caused by Exposure to Radon Gas and Natural Radiation, Phase 2) remain relevant from the perspective of the 2009-2013 Strategy for Swedish Development Co-operation and its

objective of "deepened EU integration in the area of […] environment".[9] The relevance of the project Quality Assurance and Quality Control in medical radiology" in relation to the Swedish Strategy's objective and based on the project's LFA is less immediately obvious as it would seem to be a health-sector project.

The Uranium Tailings project aimed at contributing to a national strategy for remediation sites, and project outputs were designed to provide technical advice and build Ukrainian capacity to feed into the elaboration and implementation of such a strategy in line with EU and international standards. This project has been very relevant, in that there is a national strategy in place that is being up-dated on a regular basis. The next such strategy is foreseen to span from 2015 to 2020, and, if outputs of the project are used, will be in line with international and EU standards.

The Radon Gas project aimed at the development of a national strategy in line with EU directives. The project has made first steps that could inform the initiation of the elaboration of such a strategy at the national level; however, stakeholders confirmed that there was no indication when the drafting of when such a strategy would commence.

SSM has been a relevant partner for some but not all the projects. SSM is the leading authority on civil radiation, and has the expertise to deliver a QA/QC project. With regards to the Uranium Tailings and the Radon Gas project, the institutional advantage is less obvious at first sight, given that Sweden has by and large conclusively addressed uranium tailings and radon at the national level, and this expertise is no longer located inside SSM. However, given the sensitivity of any issue surrounding radiation, it is unlikely that the Ukrainian side would accept a non-governmental counterpart, i.e. the fact that SSM is a state authority has to be seen as a precondition for any cooperation at all. The review team finds that with regards to the Uranium Tailings project, it has been invaluable that the SSM project management has a specialist understanding of the issues at hand which have ensured sound quality control that would have been difficult to achieve in a different configuration.

The choice of Ukrainian co-operation partners has been relevant as the projects were designed so as to be "located" with institutions that could be expected to drive changes at the systemic level. In project implementation terms, this has played out in various ways, with the core challenge being the indecisiveness in terms of ownership on the part of the Ukrainian authorities over the implementation period.

The political situation does not appear to affect the radiation related elements of the cooperation as much as the environment elements. Perhaps because there is not an explicit link to the EU approximation process.

[9] Strategy for Swedish Development Cooperation with Ukraine 2009-2013 http://www.regeringen.se/content/1/c6/06/37/28/70134712.pdf.

Effectiveness

The Uranium tailings project has been effective. The Uranium Tailings project stands out—possibly a function of the project objectives having been set more realistically from the onset. The main objectives and results have been achieved – although the extent to which they will be used in practice is not assured.

The QA/QC and radon gas have not been effective. In terms of effectiveness, i.e. the extent to which the projects have achieved their objectives (as opposed to the outputs), the overall record of two (QA/QC and Radon Gas) of the three projects seem modest. There is evidence that the radon gas project might even have inadvertently made the radiation situation slightly worse in some schools and houses.

Efficiency

The risk of corruption has led to inefficiency in project management in the QA/QC and the Radon Gas projects. In practice, this means that SSM has had to be in charge of every aspect of project implementation, such as reimbursement of training participants' travel costs inside Ukraine. Such an arrangement would also seem to remove responsibility from the Ukrainian counterparts, for example, at the time of the review, all contractual and logistical arrangements for conducting a seminar in the framework of the Radon Gas project had been made by SSM, only for the seminar to be cancelled at the very last minute, resulting in a loss of resources.

Severe delays in the procurement of equipment and poor targeting of training have led to inefficiency. At the time of the review, there are indications that the equipment will be procured by March 2014, but it is in doubtful whether the Ukrainian partners will receive hands-on training on the equipment that will increase the chances of it being used. With regards to training and capacity building activities, there are indications that participants were being chosen that might not in all cases be the most suitable for the activities at hand, thereby decreasing efficiency.

The number of people trained may not be enough to reach a critical mass. Questions relating to efficiency were not considered during the project design phase. In the Radon Gas project, for example, a baseline to identify how many experts would need to be involved in the project to constitute a critical mass is missing—both for remediation activities, as well as for radon mapping. It is not possible for the reviewers to assess whether training four individuals in radon mapping is a lot, or a little, or about the right quantity of experts needed in Ukraine. With regards to the remediation activities and the radon mapping, the project is likely not to have achieved its target for those individuals that have been involved in the activities, which therefore has to be considered an inefficient use of resources.

Sustainability

At the time of the review, sustainability of the project results were not assured. With regards to the QA/QC project, some capacity has been built at the level of the

participants in the training, and it is likely that this capacity will be used in some form in the day-to-day work practice of the individuals.

Where training is linked to national systems or an institutional framework, it has better prospects for being sustained and replicated. For the Radon Gas project, the reviewers find that the university education module developed under the project will be sustainable, given that it has been accredited with the Ministry of Education and the Ministry of Health, and that Taras Shevchenko University has begun training students. With regards to the training modules for specialists and local authorities, the prospect of sustainability is modest, as there seems to be no institutional framework, nor an appropriate budget, to roll these trainings out on a greater scale. As for the other capacity building done under the project (remediation activities and radon mapping), the prospect for sustainability is also rather modest, given that a) not the right people seem to have been trained and b) training on radon mapping appears to have extended to only four individuals with a prospect, at the time of the review, for the training not to be concluded successfully.

There are good prospects for sustainability for the Uranium tailings project which is linked to a state strategy. The Ukrainian authorities are likely to avail themselves of input produced by key international experts. However, the extent of what will be taken up for the strategy from the project is not known at this stage. The methodological and scientific-technical support provided through the project is likely to be sustained in some form, but it will depend on the Ukrainian authorities making available a budget to carry out remediation activities during which the new methodologies can be applied. With regards to the capacity development and civil society involvement processes, it is difficult to assess how sustainable these are, as again, it depends on the Ukrainian counterpart's readiness to take these outputs forward.

Impact

Although the uranium tailings project has not had a long term impact, there are good prospects that this could occur due to the results achieved. An impact could be expected in the uranium tailings project where results have been achieved. If the methods piloted and demonstrated are applied then considerably more remedial actions will be possible for the same level of investment. This will have a direct environmental impact.

With the lack of results in two of the three projects, future impact is likely to be limited, however longer term indirect impacts are possible even if it does not seem likely at present. For the other two projects with less tangible results it could be argued that impacts might arise despite disappointing results. For example, the radon gas project has raised awareness in some individuals and could therefore lead to the issue being handled more professionally e.g. by adaptations of the Swedish methods in the radon manual (now translated to Ukrainian). This is by no means guaranteed but it is possible depending on individual initiative. One could also argue that the efforts on QA/QC, although not leading to direct results at the scale

envisaged, might through the implementation of the associated initiative to start a medical physics masters course leading to a new mind-set around radiation safety and a new generation of professionals who are able and motivated to improve safety practice.

4 Implications and recommendations for future cooperation

4.1 LESSONS LEARNED AND THE IMPLICATIONS OF THE FINDING AND ASSESSMENT ON FUTURE COOPERATION

The major lessons learned include:

- The motivation for rapid approximation to the EU environmental objectives is influenced by political factors over which a cooperation programme has little influence.
- Stakeholder involvement has the potential to hasten the implementation of legal adjustments, concepts and strategies developed by the project assistance.
- Cooperation programmes in the public sector in Ukraine are vulnerable to instability and frequent staff changes (and this is likely to continue).
- Technical assistance and cooperation needs a permanent Ukrainian presence to be effective.
- Capacity development needs be more systematically designed and monitored, taking into account readiness to learn and make use of additional capacity.
- Selection of staff for training and study tours is an area for potential abuse.
- Procurement is a source of delay and provides scope for corruption.
- Joint projects that are not incorporated into the workplans and budgets of the implementing agencies are unlikely to be successful.
- Low project visibility undermines project's effectiveness.

The implications for future cooperation are developed point by point below:

The motivation for rapid approximation to the EU environmental objectives is influenced by political factors over which a cooperation programme has little influence. There is an opportunity for the future cooperation to create a balance in leading opinion and following political realities. A strategy for future cooperation could examine the option of setting aside a relatively small amount of resources for policy dialogue and supporting pilots that go beyond current plans and seek to advance an agenda of change, appealing to the overall goals of NEAP. The bulk of support would need to follow more closely what can be achieved within current political realities i.e. it will need to fit in and be aligned to current ambitions, priorities, and workplans.

Stakeholder involvement has the potential to hasten the implementation of legal adjustments, concepts and strategies developed by the project assistance. The environmental governance and IPPC projects have achieved impressive results in terms of mobilising and engaging with the private sector and civil society and it

appears that this is enhancing the prospects for earlier implementation. There is scope to further orientate a future programme in this direction - because non-governmental stakeholders will be the main implementers of future EU approximation and can provide both knowledge and pressure in preparing, enacting and enforcing the legislation. In one of the SSM projects Sida recognises this explicitly through its output "improved stakeholder involvement in the regulatory decision". At the same time, this approach could also slow down project implementation: 1) the procedures for public consultations are not well developed (and practiced) in Ukraine, 2) private sector (polluters) tend to be the main losers of the EU legal approximation (with some exceptions, like in the case of IPPC) and hence oppose project objectives, while 3) the environmental civil society organizations often lack a clearly defined constituency which undermines their legitimacy.

Cooperation programmes in the public sector in Ukraine are vulnerable to instability and frequent staff changes (and this is likely to continue). It cannot be assumed in a future programme that public sector staffing will be stable. A future programme has to be flexible and robust enough to adjust to changing to frequent change of senior staff and the changes in priorities that this may imply. This implies a lower level of ambition and an acceptance that repeat training will be required (such training is not necessarily lost to the sector as staff that move on will often go to or return to influential positions later). It also implies that any future results framework is designed to accommodate such changes. A future programme should continue to enhance institutional memory e.g. ensuring that lower level staff that are less likely to change are fully involved, developing manuals and systems that are independent of staff changes.

Technical assistance and cooperation needs a permanent Ukrainian presence to be effective. The nature of support to the complex, long term and unstable processes of approximation and improving environmental performance requires that a future programme has close and effective communication and an ability to adjust and react quickly to new opportunities. A permanent presence as opposed to assistance by correspondence is more effective in ensuring the delivery of tailored technical assistance.

Capacity development needs be more systematically designed and monitored, taking into account readiness to learn and make use of additional capacity. Capacity development should not be left to chance or assumed to take place because of delivery of training courses or on the job training. Given that the institutional conditions are far from ideal, it will be necessary to ensure that capacity is directed towards reducing priority performance gaps and a readiness assessment is made to ensure that newly acquired capacity will be made use of. Indicators and verifiable capacity related results should be explicit in a new programme.

Selection of staff for training and study tours is an area for potential abuse. Future projects need to be able to better address this risk, possibly through the introduction of criteria for training and study tour participants whereby the Ukrainian

partner organisations select staff, but the final choice is vetted by the Swedish side. Future projects need to assess whether training on location in Sweden is necessary, or whether training could not be held primarily in Ukraine or in the region with countries that have more recently gone through the accession process.

Procurement is a source of delay and provides scope for corruption. Where procurement of equipment is needed for a future programme, then a more systematic procurement process should be followed. Firstly, a rapid assessment of the implementing agency's ability to procure, based where possible on already available analysis, should be made and a realistic decision made whether it is better to follow Swedish or Ukrainian procedures. Either way, a procurement plan should be developed and monitored to ensure that progress is tracked and transparency ensured.

Joint projects that are not incorporated into the workplans and budgets of the implementing agencies are unlikely to be successful. Where possible, an agreement on joint projects with an implementing agency should be rapidly followed by registration of the project and incorporation of the projects into the agencies workplan, budget and internal managerial monitoring systems. The extent to which there is willingness to incorporate a project and assign staff and budget should be an important indicator of the real demand and level of priority of the project for the implementing agency.

Low project visibility undermines project's effectiveness. The visibility of the implemented projects should be increased. This should aim not as much at acknowledging donor (Sida) funding, but to achieve: i) greater transparency of the project's agenda and policy making process, and ii) accountability of the project partners. Project visibility could also contribute to higher sustainability through well documented project achievements.

The key areas of cooperation with notes on potential prospects are listed below:

Table 4.1 Cooperation prospects for current and potential areas of cooperation

Area		Notes on cooperation prospects
SEPA	Approximation to EU environmental practice	These are long standing areas of cooperation that represent high priority areas of the NEAP. Sida and EU have invested much in these areas which need to be consolidated and brought to implementation. However, much that can be done in advance of political support for implementation has been done. Therefore, in advance of new signs of political support it would probably be better to focus on policy dialogue and engagement in discussions rather than launching formal projects. SEPA could potentially play an important role in this connection. If the policy dialogue and "nudging" and/or new political considerations lead to new opportunities to advance to implementation, then a future programme in close cooperation with the EU should be prepared to provide more substantial support.
	IPPC	
	Water Resources Management (WFD) -	Provided that the project to develop key analytical products needed for the WFD is integrated into the workplans and budgets of the responsible agencies, it is considered that continuation of the project is worthwhile. The monitoring programmes and data collected will

Table 4.1 Cooperation prospects for current and potential areas of cooperation		
Area		**Notes on cooperation prospects**
		serve a permanent future purpose and would enable Ukraine to be better ready to adopt the WFD once the political conditions are improved.
	Transboundary water resources management	The project is successful (in part due to high demand arising from recent flooding). There are good prospects for continuing this cooperation with UNOPS-ENVSEC. The only drawback is that the value added by Sida is probably limited to just providing funds.
	Waste management	There appears to be a new impetus in Ukraine to improve waste management and create new business opportunities which are potentially green economy relevant. According to some commentators the source of this impetus is strong among business interests in the private sector.
	Air pollution	Although a similar programme of air pollution is successful in Belarus, it has not yet been expressed as a priority in Ukraine.
	Civil society support for awareness raising	The essential rationale for support to non-state actors is that whilst there is a political stalemate in the public sector there is still plenty that can be done through technical cooperation to advance the NEAP through responsibly supporting civil society and the private sector. Sweden has long experience of supporting civil society and the private sector within the environmental sector. It may be that the cooperation programme would not centre as much on SEPA and SSM at least for cooperation with non-state actors.
	Private sector support for adopting cleaner production and energy efficiency	
	Other	Other areas may come up in discussions between Sweden and Ukraine.
SSM	Uranium tailings	An EU project, at the time of the review in the early tendering stages, will work on what is Work Package 2 in the current SSM project. Stakeholders indicated that the project-to-be would be sufficiently resourced (i.e., no additional project would be needed).
	QA/QC	There is still much that can be done in terms of consolidating the efforts made in these projects. However, it will be wisest that a strict demand-led approach is used and that a facility established to allow the relevant authorities to make use of technical assistance as and when they are ready to do so and the purpose and likely success is clear.
	Radon gas	
	Other	SSM have an established profile and reputation in Ukraine and it would unwise to give this up or let it die due to lack of active engagement. New opportunities should be sought.

4.2 FINDINGS AND RECOMMENDATIONS

Overall finding - The objectives of SSM and SEPA programmes have been partially achieved. A combination of political and administrative factors out of the control of the programmes has significantly reduced their impact. Over optimistic design, inadequate project management and deficiencies in the provision of technical assistance and management of capacity development have also played a part.

The programmes achieved some success when the assistance targeted approximation of the Ukrainian legislation to the EU *acquis* (SEPA projects on environmental governance and IPPC) and where there were specific technical tools linked to a national strategy (SEPA project on Uranium tailings) The review has found that a number of the objectives and impacts have implementation periods that are beyond project lifecycle or are too ambitious given the level of Ukrainian absorption capacity.

An overall summary of the findings on the achievement of objectives and result, project by project, is given below. This table only provides an overview and does not look into the reasons for the level of achievement or how realistic the original intentions were. These aspects are looked into in more detail in earlier sections.

Table 4.2 Summary of achievement on objectives and results

SEPA						SSM					
Project	Evaluation of achievement					Project	Evaluation of achievement				
		?	X	P	L			?	X	P	L
Environ. governance (SEPA #1)	Overall objective	●				Radiology (QA/QC) (SSM #1)	Overall objective	●			
	Specific objective			●			Specific objective			●	
	Results				●		Results			●	
	Summary			●			Summary			●	
Southern Boog (SEPA #2)	Overall objective		●			Radon gas and radiation (SSM #2)	Overall objective		●		
	Specific objective			●			Specific objective	●			
	Results		●				Results			●	
	Summary			●			Summary			●	
IPPC (SEPA #3)	Overall objective		●			Uranium tailings (SSM #3)	Overall objective				●
	Specific objective			●			Specific objective				●
	Results				●		Results				●
	Summary			●			Summary			●	
Key: ? = not enough evidence; X = not achieved; P = partially achieved; L= Largely achieved											

For the SEPA programme, the environmental governance and the IPPC projects have achieved their results, the water management project less so. Even where results have been achieved, due to political and administrative matters beyond the programme control, these results have not been used or implemented. Therefore the intended outcomes and objective have only been partially reached. The water management project has not achieved its aims yet - only an estimated 30% of the results have been achieved, in part because they were far too ambitious in the time scale and given the political and administrative constraints. The capacity building aspects have in general been very difficult to measure, as no baseline or capacity indicators or clear outputs were defined. The evaluators have had to rely on anecdotal information on capacity development where this is available.

For the SSM programme, the Uranium tailings project has largely achieved its objectives, whereas results for the other projects on radon gas and medical radiation safety have been more limited. The uranium tailings project objectives were formulated at an appropriate level of ambition and aligned to a natural strategy. The Radiology project partially achieved its results, but it is judged that the volume and quality of training is insufficient to provide lasting results. The Radon gas project, although creating some valuable results, did not benefit from being linked to a national strategy and although valuable information and technical insight was transferred, the project results suffered from inefficient training and capacity building due to poor selection of trainees.

4.2.1 Environmental cooperation outlook

Finding 1 – EU-Ukraine and Sida-Ukraine environmental cooperation has a high potential in the longer term despite the challenges faced

The environment in Ukraine is heavily degraded. Ukraine's water resources are polluted, air pollution is an increasing challenge and large areas of land are contaminated. In many areas people risk exposure to unsafe levels of radiation. Environmental governance, management of natural resources and an effective and efficient environmental regulation are not yet in place. Instead environmental management is hampered by a cumbersome and complex set of outdated soviet era regulation and procedures.

In recent years Ukraine has developed a coherent set of environment policies and strategies including the NEAP and the environmental strategy. Recent efforts under EU and Swedish support to assist in the approximation of Ukrainian environmental legislation and practice to EU standards are well conceived and although they have not led to implementation or had an impact on the physical environment they are a necessary first step in a longer term process.

Earlier cooperation efforts have been constrained by low absorption capacity resulting from: the economic crisis; inadequate administrative capacity and, a wavering political prioritization for implementing environmental approximation to the EU. These factors are likely to remain influential to varying degrees. However, provided the cooperation can be adjusted to take account of them, there are good prospects for contributing to longer term change. A less intensive, more opportunistic and flexible cooperation approach will be needed. The cooperation areas, the choice of partners and the modalities of capacity development and technical assistance delivery will need to be adjusted, learning from the earlier cooperation.

In general this review reflects the more general view of stakeholders that merging with a future EU support programme would bring uncertainty and perhaps lessen the impact flexibility and dynamism of the assistance. Considering the very long project preparation period for EU funding, it would create a risk of being outside of priorities when the implementation time comes and with little possibility to use windows of opportunities.

Despite frustrations and problems, the spirit of goodwill and technical cooperation within environment and radiation safety between Ukraine and Sweden is judged as

highly satisfactory and provides a strong point of departure for continuing cooperation.

Recommendation 1 – Ukraine and Sweden should develop a further phase of environmental cooperation closely linked to cooperation with the EU.

1.1 Sida should base the design of a future phase of cooperation on a realistic assessment of the level of political commitment and the administrative absorption capacity.

1.2 Sida should consider whether to have a separate programme of cooperation or merge with a future EU support programme (the findings of this review tend to favour a separate programme that is closely coordinated with the EU support).

1.3 The choice of cooperation areas, partners and modalities of capacity development and technical assistance delivery should be re-designed learning from earlier phases of cooperation (see findings and recommendations 2 to 5).

4.2.2 Implications of the EU-Ukraine cooperation agenda

Finding 2 – Ukraine's political commitment towards EU environmental approximation crucially affects the realistic level of ambition, the pace of reform and the ultimate success of environmental cooperation.

Ukraine's long term environmental challenges and opportunities can best be addressed by a gradual approximation toward EU environmental legislation and practice. The political commitment towards EU environmental approximation is thus crucial for the success. Experience of the earlier cooperation has shown that when the political commitment is strong, much progress and good use of external support can be made despite economic, administrative and human resource constraints. The ambition level and shape of future cooperation will depend much on whether the Association Agreement is signed or not. Ukraine and the EU still may sign the Association Agreement in the coming few years. Environmental policy remains one of the EU-Ukraine cooperation priorities, and also is reflected in the energy cooperation priority. Ukraine needs technical assistance in the area as the environmental policy is one of the most costly and complex in terms of administration.

Even in the unlikely scenario that Ukraine drops European Integration as its foreign policy priority, the EU *acquis* will continue to be the model for the environmental policy transformation in Ukraine's reform agenda and in the region as a whole. The EU and international environmental standards are very close and therefore, Ukraine will have to abide with many of the EU standards, regardless its political course, if it wants to be a significant exporter.

In advance of signing the Association Agreement, a future programme of cooperation will need to be able to deal with a considerable degree of uncertainty on the level of political commitment. Even after signing the Association Agreement there are likely to be varying levels of implementation. This implies an opportunistic programme capable of reacting to changing circumstances. Whereas the areas of cooperation can be kept the same, the choice of partners, the level of ambition and the intensity of support may need to be adjusted.

Recommendation 2 – Awaiting clarification on the signing of the Association Agreement, future environmental cooperation should be flexible and responsive to positive signs of change.

2.1 Sida should develop a coherent strategy for assessing and responding to uncertainty in the level of political commitment together with the EU (and other development partners).
2.2 Sida should, in future environmental cooperation, support Ukraine in a flexible manner so that greater resources become available in response to windows of opportunity, whether arising from business interests, public pressure or planned government reform agenda.
2.3 Sida should consider selecting non-state partners where a long period of uncertainty in the level of political commitment is expected.
2.4. Sida should develop a clear approach/policy on cooperation between the programme managers and the Embassy in the event of projects becoming embroiled in political aspects. The programme management should provide regular (even informal) updates. Sida should consider providing more internal resources to allow the Embassy to become more involved in assessing and determining how best to respond to changing circumstances.

4.2.3 Choice of cooperation areas

Finding 3 – Most cooperation areas under the current SSM and SEPA programmes continue to be relevant.
The project thematic priorities were chosen based on EU-Ukraine cooperation priorities and Swedish priorities and these considerations are still broadly valid. The main areas that could be continued within the SEPA programme are environmental governance and approximation (IPPC and the Water Framework Directive). New areas such as waste management also have good potential and should be further explored. A implication of the findings is that the waste framework, landfill and water framework directives would need to be implemented in small steps to match absorption capacity. Partnership for approximation would be related to the Progressive Plan (Ministry of Justice), Association Agreement Implementation Program (Council of Ministers, developed under guidance of the Ministry of Economy) and National Environmental Convergence Strategy (being developed with the support of the EU TA project).

The cooperation areas under SSM are less obvious. The most promising area of addressing uranium tailings is likely to be taken over by a much larger EU project. The other areas of radon gas and medical radiation safety have mixed prospects of future success. A continuing cooperation between Sweden and Ukraine in radiation safety is potentially highly valuable and it is important that new areas of cooperation are sought even if this just means the maintenance of a low intensity of institution to institution cooperation.

Recommendation 3 – A future programme of environmental cooperation should continue within environmental governance and approximation. Assessment of future cooperation on radiation should be made.
3.1 Sida and its partners should continue cooperation within environmental governance and approximation focusing on IPPC and the WFD and potentially waste management.
3.2 SSM and Sida should engage in discussions on the potential for future cooperation within radiation safety. Unless substantial new areas of cooperation can be found, Sida should consider to support future cooperation between SSM and Ukrainian authorities on a low intensity basis.

3.3 Cooperation should be linked to those policy areas that reflect specific requirements of the AA agenda and international conventions. Cooperation areas should be based on criteria that include the scale of transboundary impacts.

4.2.4 Choice of partners

Finding 4 – The absorption capacity of public sector partners is highly constrained and is likely to remain so especially in an unfavourable political context
As outlined earlier, the public sector suffers from considerable administrative but also politically related limitations in its absorption capacity. In the event of continued weak political prioritization of environmental governance and approximation to the EU, it is an option to engage more actively with non-state actors. Cooperation with civil society can increase environmental awareness and provide a long term basis for changing mindset and practice. Cooperation with the private sector could stimulate the adoption of cleaner production and the transition to inclusive green economy. Sweden has long term experience in supporting both civil society and the private sector within environment. Civil society and the private sector in Sweden would potentially also have a role in such cooperation.

Extending the support to non-state actors would probably mean that the cooperation would become more complex and go beyond the current SEPA/SSM led arrangements.Supporting non-state actors does not mean to imply that support to government should be stopped or that support should focus only on sub-national levels.

Recommendation 4 - Sida should consider developing a strategy for cooperating with non-state actors in its next environmental cooperation programme
4.1. Sida should consider when and how to engage with non-state actors given a continuing unfavourable political context.
4.2 To support the next cooperation programme, Sida should assess the potential for cost effective support to non-state actors, the choice of potential partners and alternative modalities of support, e.g. call for proposals; core support to key organisations; design of specific projects etc.

4.2.5 Delivery of future capacity development and technical assistance

Finding 5 – Capacity has increased but it is not easy to measure it in the current results framework. Technical assistance has been effective although not always efficient. There are opportunities for improving the delivery and absorption of capacity development and technical assistance.
The design and management of capacity development and technical assistance can be improved. The environmental governance, the IPPC project and the Uranium tailings project are examples where capacity and technical assistance have been highly valued by the Ukrainian partners. In this respect, the results of the other projects are less impressive.

Capacity development and the delivery of technical assistance could benefit from a more realistic assessment of the readiness of the Ukrainian partners to learn and make use of the skills, knowledge and systems being developed. Capacity development results could also be identified and documented in a more rigorous results framework. Project reporting needs to improve. Reports need to more systematically document progress

against indicators and to reflect on causes of delay and other deficiencies. Programme management needs to be physically located in Ukraine and follow progress more closely.

Recommendation 5 - Sida should develop a capacity development and technical assistance strategy as part of a future cooperation programme that addresses the specific needs and situation for each partner and intervention.

5.1 Sida should develop a technical assistance co-ordination framework with the EU. This could include consideration of different options: i) be purely complementary and withdraw as soon as possible once the EU has satisfactory technical assistance in place or ii) envisage strong coordination and agreement with the EU on specific areas of responsibility.

5.2. Capacity development and technical assistance options and aspects should be considered including. i) formal twinning; ii) leadership of a future environmental programme either by consultants or SEPA; iii) low intensity support on radiation safety; iv) partnering with National Academy of Public Administration (NAPA) to develop and run regular trainings for the civil servants (both for entry-level and mid-level staff).

5.3 Future technical assistance and capacity development will need to be: more based physically in Ukraine; more flexible (withdrawing when not needed or where the circumstances are not favourable); acceptant that repeat training will be needed when staff change; better at ensuring only relevant staff are selected for training; based, where procurement is needed, on a transparent procurement analysis and procurement plan; integrated into the workplans and budgets of national partners; based on a flexible but also rigorous results based capacity development framework based on a readiness assessment.

Annex 1 – Terms of Reference

Background

The overarching goal of Swedish development cooperation with Ukraine 2009-2013 is deeper EU integration within democratic governance and human rights, and within natural resources and environment. The goal for the environment sector are the improved capacity of Ukrainian authorities to formulate and implement EU harmonized legislation and regulatory frameworks in the field of environment and climate change, reduced pollution in the air, ground and water, and increased energy efficiency. Sweden supports contributions to develop institutions and build capacity at national, regional and local levels for harmonisation of legislation with the EU's regulatory framework (and directives) as well as Ukraine's undertakings according to international conventions. Swedish support helps improve the ability of competent authorities to produce results-oriented reform programmes, based on national and international commitments made in the field of environment.

During 2009-2013 Sida has been supporting the institutional cooperation programmes between:

1) The Swedish Environment Protection Agency (Naturvårdsverket) and the Ministry of Ecology and Natural Resources of Ukraine, and
2) The Swedish Radiation Authority (Strålsäkerhetsmyndigheten) and the two government authorities in Ukraine – the Ministry of Energy and Coal Industry, and the Ministry of Health of Ukraine.

The goal of the cooperation between the Swedish Environment Protection Agency (Naturvårdsverket -- SEPA) and the Ministry of Ecology and Natural Resources of Ukraine is to promote an efficient environment protection in Ukraine with special emphasis on approximation to EU's legal framework and international conventions; contribute to improved capacity of the Ukraine authorities to develop and implement environmental legislation and regulations in accordance to EU's legal framework and international conventions. SEPA prepared and approved with Sida six separate projects for the amount of 25MSEK. In 2011 a project related to solid waste was dropped due to lack of interest by the then leadership of the Ministry of Ecology and Natural Resources. The activity period is between 2010-01-01 – 2013-12-31.

The goal of the cooperation between the Swedish Radiation Authority (Strålsäkerhetsmyndigheten -- SSM) and the two government authorities in Ukraine – the Ministry of Energy and Coal Industry, and the Ministry of Health of Ukraine is to help improve the radiation safety and management in Ukraine. The programme of cooperation consisted of four projects that have been addressing issues of uranium mines' radiation safety and medical radiology and radon gas exposure preventive measures. In early 2013 one project with the Ministry of Energy and Coal Industry (Radiation Protection for Workers at Operational Uranium Mining Facilities) was dropped due to non-performance. Sida's contribution to the programme is 33,5 MSEK. The activity period is between 2009-12-01 – 2013-12-31. Since the programme interventions will end in 2013, Sida intends to evaluate the effects/outcomes from the said programmes, specifically:

1. Determine the effects/outcomes from the programmes by way of addressing the established goals
2. Analyse institutional and other deficiencies and impediments that possibly prevented SEPA and SSM to achieve the institutional cooperation objectives, and
3. Advise of the potential areas of cooperation in the areas of environment protection where the Sweden's experience can be of demand beyond 2013 considering the Ukraine's ten-year Strategy for the Environmental Sector development 2010-2020, the Action Plan 2010-2015. The Ministry of Ecology and Natural Resources of Ukraine also requested to review opportunities for projects aimed at improvement of the nature protected areas.
4. Prepare, to the extent possible, an overall opinion as regards to the progress of Ukraine by way of implementation of the Action Plan for the Ukraine-EU Association in the areas of ecology and environment protection and identify major deficiency areas that require improvements.

Description of the Intervention

(i) Partners:

Swedish partners: the Swedish Environment Protection Agency (Naturvårdsverket -- SEPA), the Swedish Radiation Authority (Strålsäkerhetsmyndigheten -- SSM).

Ukrainian partners: the Ministry of Ecology and Natural Resources, the Ministry of Energy and Coal Industry, and the Ministry of Health of Ukraine and their subordinate organizations.

(ii) Period under review: 2010-01-01 to date.

(iii) Development objectives: Institutional capacity building of the Ukraine authorities in charge of environment protection and radiation safety.

(iv) Projects implemented by SEPA and SSM:

SEPA:

Environmental governance. Strengthened capacity of the Ministry to implement the National Environmental Strategy and Action Plan

1. Development of legal system and implementation of water management.
2. Development of legal system and implementation of the IPPC Directive.
3. Development of legal system and implementation of UN Convention on Long-Range Trans-boundary Air Pollution
4. Development of legal system and implementation regarding transboundary water management cooperation.

SSM:

1. Uranium tailings and remediation planning in Ukraine, ENSURE (phase 2)
2. Reduction of risks caused by exposure to radon gas and natural radiation
3. Quality assurance and quality control in medical radiology.

(v) Outputs

The outputs are listed individually per each project and are references in the Ukraine programme documents for the development interventions.

Objectives of the Review

The activity period for both programmes of SEPA and SSM end in December 2013. The overall purpose of the review is to assess the achievements of the programmes and to inform the Sida decision-making process on a potential extension of the type of development interventions in future. It is Sida's and the implementing partners experience that the actual project implementation was hampered by a number of factors

that include, foremost: a) political changes and the public administrative reform have considerably delayed implementation, b) lack of leadership and political determination for changes, c) reluctance to introduce sectoral reforms and ensure transparent information flow, and d) lack of ownership for project implementation.
The objectives of the Review are as follow:

(i) Review the evolution of the SEPA and SSM programmes' implementation during 2010-2013
(ii) Assess the progress of the stated programmes, notable achievements, and areas of possible cooperation in future
(iii) Assess the deficiencies and assume reasons for these
(iv) Assess the choice of the intervention modalities and the risks observed
(v) Assess the absorptive capacity of the Ukraine partners and motivation for reforms
(vi) Assess anticorruption and gender considerations for implementation of the stated programmes
(vii) Lessons learned, and recommendation for possible (dis)continuation of assistance in the reviewed technical areas beyond 2013.

The main beneficiaries for the review will be Sida, SEPA, and SSM. In particular, the said agencies will substantially benefit from considerations about planning and management of institutional cooperation programmes in the environment of changing administrative governance (as in Ukraine) at host government agencies and ways to best address the cooperation shortcomings.

Methodology and Team
The proposed methodologies should be a combination of a desk study and analysis of the programme materials and deliverables, meeting with the team leaders at SEPA and SSM, travel to Ukraine for the purposes of meeting with Sida and the beneficiary agencies. Sida, SEPA, and SSM shall be contacted to provide all programme-related information in Stockholm and offer suggestions as to meetings in Ukraine to ensure direct access to information for the review and correct judgement.

All costs associated with the execution of the review (travel, reimbursables, translation costs, other) shall be covered from the Review budget. Sida, apart from providing finance for the review, will exchange views on the subject matter and provide other support as deems appropriate.

An initial video/telephone contact with the Swedish Embassy in Ukraine shall be arranged before starting the review in Kyiv to fine-tune the review approach and clarify any outstanding questions.

Time schedule
The review will take up to 45 consultancy days in Sweden and Ukraine and will start immediately after the Sida call-off signed. The draft review document shall be provided to Sida for comments at least three weeks prior to the final date to allow sufficient time for comments. Following this, the final document shall be provided to Sida.

Reporting
The report shall be prepared in English. The format of the report shall be decided by the reviewer organization considering the following headings for the chapters:

- Observations

- Analysis
- Conclusions
- Recommendations.

Annex 2 – List of people met and interviewed

Table Annex 2.1 List of interviewed people in Kyiv and Stockholm

Mr Andriy Parinov	Programme Officer, Development Coopration, Embassy of Sweden
Ms Christina Danielsson	Counsellor, Embassy of Sweden
Ms Ebba Aurell	First Secretary, Development Cooperation, Embassy of Sweden
Mr Oleksander Klitko	Sector Manager, Environment, Delegation of the European Union to Ukraine
Ms Anna Golubovska-Onisimova	Capacity building, coordination and visibility expert, EU Budget Sector Support Programme
Mr Andre Karutz	Investment Expert, EU Budget Sector Support Programme
Mr Alexei Iaroshevitch	Team Leader, EU Budget Sector Support Programme
Mr Jerzy Sarnacki	Environmental legal expert, EU Budget Sector Support Programme
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Ms. Olga Lysyuk	Head, Department of Water Resources management, State Agency for Water Management
Dr Liudmyla Aslamova	Professor, National Taras Shevchenko University
Dr Tetiana Pavlenko	Head of Laboratory of Natural Resources, Institute of Hygiene and Medical Ecology named after O.M. Marzeyev
Mr Oleksander Sotnikov	Deputy Head of Department, Nuclear Security, State Nuclear Regulatory Inspectorate
Ms Antonina Myshkovska	Head, Sector of Radiation Security and Mitigation of medical problems of Chernobyl NPP accident, Ministry of Health
Ms Olena Ovchynnikova	Programme Analyst, Energy and Environment, UNDP
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Ms Cecilia Somell	SSM Project Manager, Department for International Relations (via phone)
Mr Olof Karlberg	SSM Project Manager, Department for International Relations
Ms Tony Lofkqvist	Mark och Miljo Kontroll AB (via phone)
Mr Oleg Voitsekhovitch	Ecomonitor
Ms Anna Peters	SEPA Water Project Southern Bug
Ms Anna Forsgren	SEPA
Ms Barbara Hessel	SEPA
Mr Mats Olsson	SEPA

Annex 3 – Selected list of documents reviewed

SEPA

1. Sepa, March 2013, Annual report for the cooperation with Ukraine 2012
2. Sepa/ ENVSEC, November 2012, Proposal to the Swedish Environment Protection Agency for additional activities in supporting international cooperation in the shared water basins of Ukraine
3. Sepa, March 2012, Annual report for the cooperation with Ukraine 2011
4. Sepa, December 2011, Program for law making activities targeted towards facilitation of the environmental authorization system and implementation of a single window system (study)
5. Sepa, March 2011, Integrated Permitting in Ukraine (project description project #3)
6. Sepa, 2011, Årsrapport Ukraine 2010
7. SEPA, June 2009, Naturvårdsverkets programsamarbete med Ukraina 2009-2013 (program proposal)
8. Sepa May 2009, Swedish Environmental Protection Agency Programme of Cooperation with Ukraine (Ministry of Environmental Protection) Results matrix 2009-2013
9. Sepa, March 2009, Reserapport Ukraina 16-18 mars 2009
10. Sepa, March 2008, institutional strengthening and capacity building for the Ukrainian river basin management authority (project description)
11. Sepa, September 2007, Environment and Security Initiative (ENVSEC) (project proposal)

29. Sepa, December 2009, Assessment project Memo of SEPA cooperation program 2009-2013
30. SEPA, March 2010, Decision memo on IPP (project #3)
31 SEPA, *blank for the moment*
32 SEPA March 2011, Budget details on IPP (project #3)
33 SEPA, March 2010, Comments on the IPP (project #3)
34 SEPA, March 2012 Financial report 2011
35 SEPA, March 2013 Financial report 2012
36, SEPA, February 2012 Financial plan 2009-2013
37 SEPA, February 2012, Results matrix (see also reference #8 for 2009 version)
38 SEPA, March 2010, Budget details for Southern Booh WB – (project #5)
39 SEPA, April 2012, Results framework for Belarus *(this is needed for Ukraine as well)*
40 SEPA, 2010, Budget details (not clear what project)
54 SEPA, June 2009, Analysis of the program
55 SEPA, June 2009, Minutes of meeting of the decision committee

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12. SSM, September 2013, SSM Progress Report to Sida on Ukraine Programme Period January - March, 2013 (correction April to june)

13. SSM, April 2013, SSM Progress Report to Sida on Ukraine Programme Period January - March, 2013
14. SSM March 2013, SSM Annual Report to Sida regarding the Ukraine Program Period January - December, 2012
15. SSM, October 2012, Radiation Protection of workers at the operational uranium mining facilities, Ukraine Final Report for the Period 2010 – 2012 (we got two copies)
16. SSM February 2012, SSM Annual Report to Sida regarding the Ukraine Program Period January - December, 2011
17. SSM, November 2009, Radiation protection development cooperation with Ukraine Application by SSM for the period 2009 – 2013 (program proposal)
18. SSM, July 2011, SSM Progress Report to Sida on Ukraine Programme Period December, 15 2010 – March 2011 (correction April to june)
19. SSM, April 2011, SSM Progress Report to Sida on Ukraine Programme Period December, 15 2010 – March 2011
20. SSM, February 2011, Radiation protection development cooperation with Ukraine Annual report 2010
21. SSM, February 2010,Project: Emergency Preparedness in Ukraine, phase 2 2010-(presentation)
22. SSM, February 2010, Radiation Protection for Workers atOperational Uranium Mining Facilities (presentation)
23. SSM, February 2010, Improvement of radiation protection at Sevastopol National University of Nuclear Energy Industry (SNUNEI) (presentation)
24. SSM, February 2010, Uranium Tailings and Remediation Planning in Ukraine(presentation)
25. SSM, Zinger, I., April 2008 A review of Sida-supported cooperation on civil radiation in the Ukraine
26. SSM, November 2006, Swedish Radiation Protection Co-operation Programme 2006-2008
27. SSM, Sida November 2006, Assessment Memo
28. SSM, Zinger, December 2011 State of the Art on Dose Estimation for Minersand Radiation Protection at Ukrainian Operated Uranium Mines (study – one of the deliverables SSM project 1)
48. SSM January 2010, Agreement with Sida
49. SSM June 2009, Assessment and preparation plan
50. SSM, December 2008, report on LFA workshops
51. SSM, LFA for project 1
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EU – Ukraine Reports on Association Agenda and Progress towards Association Agreement

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63, EU, EU-Ukraine Association Agenda to prepare and facilitate the implementation of the Association Agreement, http://eeas.europa.eu/ukraine/docs/2011_eu-ukraine_association_agenda_update_en.pdf
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56. Other, 2009, Sweden UD, Strategy for Development Cooperation with Ukraine January 2009- December 2013
67. Other, December 2011 An Analysis of Developments in the Ukrainian Energy and Environment Sectors for Sida
68. Other, September 2013, Report on Implementation of the Law of Ukraine "On Main Principles (Strategy) of National Environmental Policy until 2020" in 2012
69. Other, December 2010, THE FUNDAMENTAL PRINCIPLES (STRATEGY) of Ukraine's Environmental Policy for the Period until 2020
70, Other, May 2010, National Action plan for environmental protection

71, Other 2012, Annual Report “Citizens’ opinion on the implementation of the environmental policy in 2011”
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73. Other, 2010, ICPS, Capacity assessment of the Government to organize implementation of the EU-Ukraine Association Agreement

Review of the Sida-funded Institutional Cooperation in the Field of Environment in Ukraine

This report reviews the Sida-funded Institutional Cooperation in the Field of Environment in Ukraine (2009-2013) between the Swedish Environment Protection Agency (Naturvårdsverket), Swedish Radiation Authority (Strålsäkerhetsmyndigheten) and their Ukrainian counterparts. The review concludes that the objectives of Sida programmes were partially achieved with shortcoming arising from a combination of political and institutional factors, most but not all of them being out of the control of the programmes. Ukraine's political commitment towards EU environmental approximation will crucially affect the realistic level of ambition, the pace of reform, the content and nature of future support and, the ultimate success of environmental cooperation in the future.

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