

- As TUSEV, since our Project was signed in April 2018, we are subjected to PRAG 2016 Rules. Due to the financial and administrative rules of PRAG 2016, every minor change in budget and content is subjected to notification. Although we are able to present their notifications regarding any amendment request before the interim reports, the request can be suspended until the receipt of the clarification by the Contracting Authority.
- There is a lack of coordination and common understanding among the different departments within the same Ministry; such as; the financial document regarding tax issue sent by Financial department of CFCU to be submitted to Revenue Administration might not be recognized by the Administration.
- Regarding the EU visibility rules, the logos and disclaimer (translation) in both languages for all visibility materials should be agreed before and should not be amended during the implementation of the activities. Due to the different shapes of institutional logos, the recommended sizes in the guide do not work always.
- Standard budgeting rules can be challenging for managing the budget in terms of the procurement in real life. Unit price is used as a financial criteria/check for all budget items; however average prices should be used especially for travel costs. Otherwise, in every increased cost – which is subjected to market prices – we had to revise the budget in total and revise the amount of the travel costs in accordance with the new unit price. By nature this situation creates a big challenge in equalizing unit prices and leads to time consuming for calculation. The same problem is valid for the justification for per diems and travel costs too. In addition, due to the same rule, although there is sufficient budget for an activity, we have to transfer more from other budget items. for example, two meetings are planned in the DoA and the cost of the first meeting is under unit price and if the cost of second meeting is above the unit price although there is sufficient amount, we have to transfer additional amount to the budget item in order to increase the unit price.
- The approval duration for the request of amendment takes long time, and we may be requested to submit additional clarification several times.

Regarding the development of Description of Actions;

- It will be better if the logframe of the Projects are developed with more concrete and accessible indicators and achievable and realistic targets. The targets in the logframe should be identified by taking the limits of intervention of the CSOs into consideration.
- It will be better if common activities and evaluation meetings for the consortium partners/different CSOs is integrated into the Description of Actions.
- It is better and more effective if some of the activities addressing the public sector and public officers are organized and developed by the call/invitation of related public institution.