



Assessment Sheet

1. Identification

1.1	Name	Just and Inclusive Mobility Planning in the Baltic Sea Region
1.2	Short name	JustMoves
1.3	Programme priority	3. Climate-neutral societies
1.4	Programme objective	3.3 Smart green mobility
1.5	Project implementation	36 months

1.6	Project summary (imported from the application)
<p>Transport is a major contributor to CO2 emissions in the EU with the 2nd largest share of overall emissions after the energy sector. Despite this, the needs of car drivers commuting during peak hours have often been at the focus of mobility planning. While the current planning approach has been considered to serve the needs of all, in reality several types of users, such as the elderly, children or the disabled have been underserved. By overlooking the needs of disadvantaged groups, the decarbonisation potential of transport is hampered and social exclusion aggravated. JustMoves brings together BSR cities of Stockholm, Turku, Gdansk, Horsens and Kurzemes region, three knowledge partners and a wide variety of AOs in tackling the joint challenge of lack of inclusiveness in mobility planning. The main objective is to support BSR cities and regions in making the transition to low-carbon transport systems more inclusive and just. The project is targeted at the parties that exert influence over the mobility system: the local & regional public authorities and infrastructure and service providers. Via two jointly developed solutions - Inclusion ABC and Guidelines for measuring, monitoring end evaluating inclusion in the BSR – the target groups will have better prerequisites to support sustainable mobility of disadvantaged groups and, at the same time, boost overall use of sustainable transport modes, serving the ultimate goal of cutting transport emissions in the BSR and beyond.</p>	

1.7	Financial resources (all amounts in Euro)	Planned project budget
	ERDF co-financing	2,650,846.33 €
	Own contribution EU partners	662,711.60 €
	ERDF budget	3,313,557.93 €
	NO co-financing	0.00 €
	Own contribution NO partners	0.00 €
	NO budget	0.00 €



Total Programme co-financing	2,650,846.33 €
Total own contribution	662,711.60 €
Total budget	3,313,557.93 €

1.8 Project partnership						
No.	Organisation		Partner budget	Programme co-financing	State aid relevance	Took part earlier
1	Turku University of Applied Sciences	FI	662,980.00 €	530,384.00 €	No	Yes
	Higher education and research institution					
2	City of Turku	FI	674,127.00 €	539,301.60 €	No	Yes
	Local public authority					
3	Gdansk municipality	PL	419,829.36 €	335,863.48 €	No	Yes
	Local public authority					
4	City of Stockholm	SE	198,259.50 €	158,607.60 €	No	Yes
	Local public authority					
5	Kurzemes planning region	LV	268,332.00 €	214,665.60 €	No	Yes
	Regional public authority					
6	The Institute of Baltic Studies	EE	398,364.00 €	318,691.20 €	No	Yes
	NGO					
7	WiseEuropa	PL	167,220.87 €	133,776.69 €	No	No
	NGO					
8	Horsens Municipality	DK	524,445.20 €	419,556.16 €	No	No
	Local public authority					

1.9 Associated Organisations		
No.	Organisation	Country
1	Swedish Association of Local Authorities and Regions	SE
	Interest group	
2	Region Stockholm	SE
	Regional public authority	
3	Gdańsk City Development Directorate	PL
	Sectoral agency	



4	Gdansk Development Office	PL
	Sectoral agency	
5	Gdańsk Roads and Greenery Management Board	PL
	Infrastructure and public service provider	
6	Helen Keller Foundation	PL
	NGO	
7	The Powers Foundation	PL
	NGO	
8	Public Transport Authority	PL
	Infrastructure and public service provider	
9	Sensitive World Foundation	PL
	NGO	
10	Window to the World Association	PL
	NGO	
11	Regional Council of Southwest Finland	FI
	Regional public authority	
12	Turku Cyclists Association	FI
	NGO	
13	UN Women Finland	FI
	NGO	
14	KaaKau Oy	FI
	Small and medium enterprise	
15	The joint council of the rural districts	DK
	NGO	
16	HHX & HTX High school	DK
	Education/training centre and school	
17	STX & HF High school	DK
	Education/training centre and school	
18	Nabogo ApS	DK
	Small and medium enterprise	
19	Danish Cyclists' Federation	DK
	NGO	
20	Central Denmark Region	DK
	Regional public authority	
21	Latvian Association of the Blind	LV



	NGO	
22	Liepāja municipality	LV
	Local public authority	
23	Association "Apeiron"	LV
	NGO	
24	State Ltd. Road Transport Administration	LV
	Infrastructure and public service provider	
25	Passenger Train	LV
	Infrastructure and public service provider	

1.10 Project's contribution to the EU Strategy for the Baltic Sea Region	
planned	PA Transport

1.11 Horizontal principles	Project's impact
Sustainable development	positive
Non-discrimination including accessibility	positive
Equality between men and women	positive

1.12 Outputs
<ul style="list-style-type: none"> Inclusion ABC Guidelines for measuring, monitoring and evaluating inclusion in the BSR

2. Admissibility check

OUTCOME OF ADMISSIBILITY CHECK
The project passed the admissibility check.

3. Final conclusion and requirements

FINAL CONCLUSION



The proposal does not demonstrate sufficient quality to be approved.

The proposal intends to address the accessibility of public transport and mobility services for vulnerable groups. The project presents a competent partnership with a considerable number of relevant associated organisations. Despite this partnership’s potential and the overall valuable intention, the challenge does not seem to be clearly identified and focused and does not consider the existing solutions and gaps to be solved. The specific needs of the targeted public authorities and service providers are also not properly explored, which creates risks for the usefulness of the planned solutions. The work plan is weakly developed with an unclear description of the piloting activities. The pilot actions do not validate the usefulness of the solutions and are detached from them. The additional value and uptake of the solutions remain unclear, especially given the availability of existing tools already created by other Interreg projects in the field of mobility.

Quality assessment

Scoring system: 5 (very good), 4 (good), 3 (sufficient), 2 (weak), 1 (insufficient)

I. Relevance of the proposal	SCORE	2
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Thematic focus

- Does the challenge tackled by the project match the selected Programme objective and the focus of the call?

The proposal weakly matches the selected Programme objective and the focus of the given call.

From the general thematic point of view, the challenge addressed by the project sufficiently matches the selected Programme objective.

The project focuses on the lack of inclusive measures in transport for vulnerable groups (e.g. "elderly, women, children or people with physical or cognitive disabilities") in BSR cities. According to the description, the focus of multimodal transport solutions is mostly on non-disabled average users, and the needs of vulnerable groups are underserved. The unserved need of the vulnerable groups results in this group's reduced use of active mobility in everyday life, resulting in higher CO2 emissions in cities due to mobility carried out by private cars. The context in general, i.e. lack of integrative solutions for vulnerable groups in multimodal transportation, matches the Programme objective for example on rethinking transport planning. Nevertheless the project fails to deliver the specific struggles and needs of the participating cities and the other target groups in this context and the description remains general and vague.

The application weakly addresses the focus of the call, i.e., the topic of climate change.





The project addresses the topic of mobility and the inclusiveness of multimodal mobility solutions for vulnerable groups. Although the challenge description does not comprehensively explain its connection to climate change, the proposal demonstrates some potential to contribute to its efforts. The contribution could evolve around the increased use of multimodal mobility solutions by the vulnerable groups who would be less exposed to using their private cars, which could contribute to reducing CO2 emissions through transport in BSR cities. While the increased use of multimodal mobility solutions by vulnerable groups could reduce CO2 emissions through decreased reliance on private cars, the scale of this impact is likely limited. The overall contribution to reducing transportation-related emissions in BSR cities may be modest.

The application does not describe its contribution to the thematic challenges specified in the announcement note for Priority 3. (i.e adopting and implementing better integrated and more systemic approaches to planning processes in sectors key to mitigating climate change; mainstreaming a climate-conscious perspective through participatory and inclusive approaches; implementing effective strategies to combat climate change by improving the generation, distribution, utilisation and storage of energy; promoting circular practices as a means to address climate change, e.g. supporting businesses and communities in taking up circular approaches.)

Target groups

- Are the selected target groups relevant to tackle the identified challenge, e.g. regarding geographical coverage and types of sectors involved?
- Are the needs of the target groups clearly described?

The selected target groups are very clearly relevant to tackling the identified challenge. However, the application does not clearly describe the needs of the target groups.

The selected target groups include local public authorities, regional public authorities, infrastructure and service providers in the urban transportation sector. The chosen target groups are very clearly relevant for tackling the challenge. However, their needs are limited to generically mentioning "knowledge and training in inclusive mobility and face data gaps on vulnerable groups' needs." The project does not describe the context or specific needs arising from the target group members involved in the project, which could add valuable information to the general context of inclusive urban mobility. Though not clearly explained, the generally indicated needs of the target groups (for example, knowledge and training in inclusive mobility and data gaps on vulnerable groups' needs) seem relevant to the identified challenge. In the challenge, the project mentions two aspects. On the one hand, "insufficient route connectivity, physical or digital inaccessibility to public transport and mobility services increase exclusion among vulnerable groups." Secondly, the project writes, "Planning authorities and infrastructure and service providers lack relevant data on the mobility habits, needs and challenges faced by disadvantaged groups, and their knowledge of inclusive planning practices may be inadequate." The need to gain more knowledge, data and training is connected to the second aspect.

The target groups' geographical coverage seems appropriate for the proposed challenge. However, the project only provides limited details on the selection of countries.



The defined field of responsibility of the selected target groups seems to be relevant to tackling the identified challenge. For example, local public authorities, regional authorities, and infrastructure service providers are responsible for developing and implementing sustainable mobility plans and making the necessary investments to connect public and private transport services.

Transnational value

- Does the application clearly explain the need for transnational cooperation to address the identified challenge?

The application sufficiently explains the need for transnational cooperation to address the identified challenge.

The choice of involved countries (Finland, Denmark, Poland, Sweden, Latvia, Estonia) is sufficiently explained. The project describes some of the aspects that connect the target group members of the countries (e.g., increasing the share of older adults in the societies) but also aspects that are different (e.g., policy development and the stage of implementation of sustainable mobility solutions). These connecting points and differences seem to provide sufficient ground for the joint development of solutions.

Project objective

- Is the planned project objective in line with the needs of the target groups?

The planned project objective is sufficiently in line with the needs of the target groups.

It is sufficiently explained how the project aims to address the needs of the selected target groups. As mentioned above, the description of the needs of the target groups is limited to knowledge, data, and general training. For example, the project does not provide additional information on how the involved cities use available resources and what gaps need to be filled by the project outputs. Consequently, it can only be concluded that the objective will sufficiently respond to the vaguely defined needs -- to train the target groups and equip them with basic tools to better understand the mobility needs of vulnerable groups.

Contribution to the policies and strategies

- Does the project plan to contribute to the implementation of the Action Plan of the EU Strategy for the Baltic Sea Region (EUSBSR)?
- Does the project plan to contribute to achieving specific goals or implementing actions of other strategic documents relevant to the Programme area?

The proposal seems to sufficiently contribute to policies and strategies relevant to the Programme area.

The application sufficiently describes how the project plans to contribute to implementing the Action Plan of the EUSBSR. It contributes to the Policy Area Transport Action 2: Development of measures towards climate-neutral and zero-pollution transport through two solutions targeted at providing local and



regional authorities and infrastructure and service providers. These solutions are supposed to improve the inclusiveness of sustainable mobility planning and consider the needs of vulnerable groups.

The project also plans to contribute to achieving specific goals of actions of other strategic documents relevant to the Programme area. The project plans to contribute to the following strategic documents:

- EUSBSR Policy Area Spatial Planning
- Europe on the Move
- The New European Urban Mobility Framework (2021)
- The European Pillar of Social Rights

Additional value

- Is it clearly explained how the project plans to build on the outcomes of other projects?
- Does the application demonstrate additional value to implemented and running projects, in particular to the projects of Interreg Baltic Sea Region?
- Is cooperation with other projects planned?

The proposal demonstrates low additional value to current or already completed projects relevant to the Baltic Sea region.

The application does not clearly explain how the outcomes of other projects will be or have been considered when planning the solutions.

For example, the project mentions several finished or currently running projects that have developed toolboxes and toolkits targeting the Silver Age society and shared multimodal mobility. However, it does not address the shortcomings of the existing tools or how the proposed outputs by the project will harmonise and enhance them. Furthermore, the project fails to mention existing guidelines for inclusive mobility planning and how these have been considered. Most of the mentioned projects focus on public transportation, and the project's added value could be in examining the active mobility aspects for vulnerable groups. Nevertheless, it is unclear from the description of the results/planned results of the other projects how thoroughly these aspects have been addressed and to what extent. From the descriptions provided, it is also not evident what level of development and improvement for the target groups has been achieved by the mentioned projects and at what stage JustMoves intervenes and builds on the existing knowledge.

The application demonstrates low additional value in implementing and running projects financed by Interreg BSR or other Programmes and initiatives. (e.g. GREENSAM, HUPMOBILE, SUMBA, SUMBA+)

Although the application does not seem to duplicate activities and outputs carried out by the projects co-financed by Interreg BSR, it does not clearly explain its added value (especially the added value of the planned outputs) to the already completed or ongoing projects supported by the Programme.

The project plans to cooperate with other projects. The project mentioned the cooperation with the ongoing Interreg BSR projects SUMP's Up BSR and BATS. It also intends to establish contact with the Interreg North Sea project SMALL.



II. Partnership	SCORE	4
<p>Partnership</p> <ul style="list-style-type: none"> • Does the partnership have the necessary competence to implement the planned activities and to achieve the planned objective? • Are the selected target groups involved as partners? • Are the roles of all partners in project implementation clearly explained? • Is the involvement of the partners planned in accordance with the requirements of the Programme? • Are the involvement and responsibilities of the partners in the project planned in a balanced way? • Are the roles of the associated organisations clearly explained? • Do the partners have sufficient human and financial capacity? 		
<p>The partnership seems to have good potential to realise the planned activities and to achieve the planned objective.</p> <p>The partnership seems to possess relevant competencies for implementing the planned project. The project's selected target groups are partly involved in the partnership.</p> <p>Target groups that are involved as partners are local public authorities and one regional authority. The partnership comprises four municipalities, two NGOs, one higher education and research institution and one regional authority. The project did not include infrastructure and public service providers as partners with a budget. They have been added as associated organisations, though. This partnership setup seems to allow for sufficient collaboration among the two crucial target group members (municipalities and the service providers). The partnership with the support of the Turku University and of the two NGOs seems to have the competence to deliver the planned outputs.</p> <p>The roles and tasks of all partners in the project implementation are sufficiently explained.</p> <p>The involvement of the partners is planned in accordance with the requirements of the Programme.</p> <p>The involvement and responsibilities of the partners in the project are planned in a balanced way. For example, there do not seem to be imbalances in the roles of the partners (e.g. involvement of the partners from different countries in the implementation of activities).</p> <p>The roles and tasks of associated organisations are sufficiently explained. Their involvement seems to bring additional value to the proposal.</p> <p>It seems that there are no evident risks in relation to the project partners (private partners in particular).</p> <p>However, project partner 06, The Institute of Baltic Studies (EE), is already participating in another approved project (SUMP for BSR) with a budget of nearly 370,000 EUR. In the current proposal, their budget is almost 400,000 EUR. The concern isn't about their financial health but their ability to cover expenses upfront and maintain financial stability, since the Programme funds are reimbursed after expenses are incurred. To address this risk, the partner should provide extra information or documents showing they can handle these financial demands effectively.</p>		



III. Work plan	SCORE	2
<p>Preparing, piloting and evaluating, transferring solutions</p> <ul style="list-style-type: none"> • Do the planned solutions address the identified specific challenge? • Is there a clear approach on how the project plans to develop or adapt solutions? • Does the project plan pilots to validate the usefulness of the solutions? • Does the project evaluate and adjust solutions? • Does the application present a realistic plan how to communicate and transfer the ready solutions? • Does the project encourage active and continuous use of the solutions after the project end? 		
<p>The overall quality of the work plan presented in the application is weak.</p> <p>It seems that the planned solutions partly address the identified challenge. The project identified the challenge as the lack of relevant data on the mobility habits, needs, and challenges of disadvantaged groups, the knowledge of inclusive planning practices by the local and regional authorities, and the infrastructure and public service providers. The project intends to address the challenge by developing an Inclusion ABC. This would be an online training module available in both online and offline versions. It would include a collection of best practices to ease the inclusive mobility planning process, as well as guidelines for measuring, monitoring and evaluating inclusion in the BSR on "how to recognize the needs of diverse users of mobility services and infrastructure and how to better measure these needs". If applied, the planned solution seems to contribute to helping the target groups increase their awareness of the topic of inclusive urban mobility. However, there are weaknesses in the work plan about how the target groups will actually carry out and put into practice the planned solutions. This creates uncertainty about how effectively these solutions will help local authorities promote inclusive mobility during the project.</p> <p>The project provides a partially clear approach to how it plans to develop solutions. For instance, it outlines specific steps and methods to be employed by the pilot cities, such as organising workshops with target users in GoA 1.1 and applying an existing method, "Context for Change," to map the current situation in GoA 1.2. However, the preparation of the solutions themselves is less detailed. For example, the inclusion of ABC appears to be more of a collection of best practices to be tested in WP2, rather than a standalone solution. While the training program is described in more detail, the emphasis is placed on explaining its purpose rather than on the collaborative processes that the partners will implement to develop it.</p> <p>The project insufficiently plans pilots to validate the usefulness of the solutions.</p> <p>There is insufficient information provided on how the practical implementation of the tools will look in the pilots. The planned pilots are predefined in work package one and seem to be examples of best practices to be added to the ABC rather than testing the Inclusion ABC itself. Furthermore, the project does not explain the interconnections between the pilots that are very different in nature and in scope:</p> <ul style="list-style-type: none"> • Turku – safety situation from the female perspective, mobility hub and winter cycling and wheeling programme; • Gdansk – city competence center for accessibility; 		



- Kurzeme – multimodal transport connecting the railway station with the bus station in Tukuma municipality and inclusion planning accommodating all the challenges posed by a World Heritage Site;
- Horsens – challenges related to children & young people self-transporting to and from school, kindergarten & youth educational institutions, and complementing the already existing mobility offers;
- Stockholm - testing solutions linked e.g. local climate co-creation arenas.

Similarly, the concept of the second solution, the monitoring guideline, will be developed and discussed in the partnership. Still, it is not evident from the descriptions how the above-listed planned pilots will test it in practice. Consequently, the project missed to describe clearly a crucial element of the piloting, namely, the real life exercise to allow the target groups to test the solutions and evaluate their usefulness.

The project plans to evaluate the local pilots but insufficiently plans to evaluate and adjust the solutions. In work package two, the project describes the planned methodology for evaluating the pilots and discussing the learnings among the participating cities. Nevertheless, as the pilots do not seem to test the solution but to contribute with data and examples to the planned solutions, we cannot conclude that the evaluation and adjustment of the solutions is properly planned by the project.

The project plans to communicate and transfer the ready solutions. For example, the project plans to organise local workshops with neighboring municipalities and national level workshops to talk about their experience in implementing the pilots and inform about the availability of the solutions. Furthermore, the results are planned to be disseminated through the network of the Union of Baltic Cities.

The planned timeline seems realistic to prepare, pilot, evaluate, adjust, communicate and transfer solutions.

In terms of the planned transfer activities, the project seems to partly encourage active and continuous use of the solutions after the project end. However, it is not fully clear, how much the solutions would actually be considered as practically useful and realistically applicable by the target groups. As discussed at the beginning of the assessment, the project has not properly investigated the situation, the usefulness of the existing tools and the remaining gaps. The uptake of the solutions would in reality depend on how relevant and beneficial these solutions are considered by the public authorities and service providers in their daily work and planning efforts.

Target groups

- Is the involvement of the target groups well planned in each work package?

The involvement of the target groups is sufficiently planned in the work plan.

In the preparation of the solutions, the involvement of the target groups (the partner municipalities) is sufficiently planned. The lead partner plans to introduce the relevant methodologies to the participating cities, which should carry out studies to get insights into barriers and drivers of developing inclusive



mobility. Although as mentioned in the previous section the pilots do not specifically target testing the planned solutions, the target groups have pilot plans that are described in some detail in the work plan. Therefore the involvement of the target groups at least of the municipalities seems sufficiently planned for the piloting. Regarding the other target groups, the description contains a reference about involving their representatives in the work plan, but the information is not developed further. Similarly, the plans for the evaluation and transfer are sufficiently describing the involvement of the partner cities, but provide little to no details on how the remaining target group members will be involved in this process.

Transnational cooperation

- Does the project plan to implement activities and outputs in a transnational setting?

The project does not clearly plan to implement activities and outputs in a transnational setting.

The preparation of the solution is planned sufficiently in a transnational way e.g. regular meetings in work package one. The pilot implementation has clearly a less transnational setting. While it is understandable that the solution testing is focused more on the local contexts, the application could have explained the planned collaboration within the project consortium during this process.

The evaluation of the pilots seems to be done individually, too, whereas the plan is to share those experiences in the partnership and have group exchanges about them. This approach is again not fully in line with the joint evaluation, as it only resembles an exchange of best practices.

Transnational cooperation is sufficiently planned in the transfer for example the planned trainings seem to be planned as a joint effort of the partners.

Output and result indicators

- Does the project contribute to the output and result indicators defined by the Programme?
- Are the targets set by the project realistic?

The project contributes to the following output and result indicators defined by the Programme.

The project plans a contribution to the following indicators:
RCO 84 – Pilot actions developed jointly and implemented in projects 6
RCO 116 – Jointly developed solutions 2
RCO 87 - Organisations cooperating across borders 33

RCR 104 - Solutions taken up or up-scaled by organisations 2

PSR 1 - Organisations with increased institutional capacity due to their participation in cooperation activities across borders 58

The set targets seem to be partly realistic, although the number of the planned pilots does not seem to be in line with the methodology of counting pilots of the Programme. Also the target number of organisations planned for PSR1 requires clarification should the project be selected for funding.

IV. Durability	SCORE	2
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<p>Durability of the outputs</p> <ul style="list-style-type: none"> • Is the use of the developed solutions well planned by partners and other organisations in different countries, also beyond the project end? • Does the developed durability concept include institutional and financial support to keep the outputs functional after the project end? 		
<p>The use of the developed solutions in different countries, also after the project end, is weakly planned in the application.</p> <p>It seems that the solution will only partly be used by the target groups beyond the implementation phase in their daily work.</p> <p>The project clearly describes the plans for keeping the outputs available after the project end. However, since the piloting and the uptake of the tool within the partnership is not clear due to weakly planned piloting, it is not clear how the target group involved in the project will continue using the tool in their every day work after the project.</p> <p>The durability concept, in terms of maintaining the outputs and keeping them available after the project is clearly described. It includes institutional and financial support to keep the outputs functional after the project end. However, as mentioned, the remaining aspects of the uptake and use of the tool are only vaguely developed, and there is not enough evidence from the work plan to demonstrate how the target users will be engaged and incentivised to adopt and sustain the use of the tool in the long term.</p>		
V. Budget	SCORE	3
<p>Budget adequacy</p> <ul style="list-style-type: none"> • Is the budget appropriate in relation to the planned activities, outputs, results, and involvement of partners? 		
<p>The planned budget seems to be sufficiently in line with the planned activities, outputs, results and involvement of partners.</p> <p>The planned partner budgets seem partly adequate considering their involvement and responsibilities in the project.</p> <p>There is an imbalance in budget shares between the involved countries 40 % of the total project budget is allocated to the project partners from Finland (represented by two out of eight partners), while, for example, the budget provided for Sweden is 6 % (one PP) and for Latvia (one PP) with 8 % of the total project budget.</p> <p>There are certain imbalances between the project partners, especially visible in the case of PP07 whose percentage share in the total budget is only 5%, or in the case of PP04 with only 6%.</p> <p>20% of the project budget is foreseen for the Lead Partner, however, also this fact seems to be justified by the leading role in the project. Project partners 02, 03, 06, and 08 have significantly higher budgets than regular partners in this call, particularly PP02, and PP08, whose budgets exceed 200% of the call average.</p>		



One type of project partner dominates the budget allocation: 55 % of the total project budget is foreseen for local public authorities, however, this fact is well justified by the partnership structure and needs of the project.

There are no imbalances between participating countries.

The total project budget of 3.13 million EUR is above the average project budget for call C3.2, which is 2.6 million EUR. Considering that the proposal consists of 8 partners, whereas the average is 9, this higher budget allocation appears slightly overbudgeted.

The planned shares of management and work packages seem partly adequate considering their importance for the planned outputs/solutions and results.

Technically, 25% of the total project budget was allocated to work package no. 3, "transferring solutions." Even though the project plans local and national workshops in every country and at least two webinars and trainings to promote the Inclusion ABC, the total budget for WP3 (~ EUR 800,000) seems over proportionate for the planned activities.

The planned total budget seems partly adequate considering the planned outputs and results. Although the project aims to address the lack of relevant data on the mobility habits and needs of disadvantaged groups and improve inclusive planning practices, there are significant gaps in how the solutions will be implemented and tested. The work plan lacks detailed information on how the target groups will carry out and apply the planned solutions in real-life scenarios, creating uncertainty about the project's effectiveness in promoting inclusive mobility.

The pilots, intended to validate the solutions, appear more like examples of best practices rather than practical tests of the developed tools. Moreover, the interconnections between pilots of varying nature and scope are not clearly explained. This lack of cohesive testing undermines the project's ability to effectively evaluate and adjust the solutions.

Additionally, the project addresses the topic of climate change only weakly. While there is potential for reducing CO2 emissions through increased use of multimodal mobility solutions, the scale of this impact is likely limited. The insufficiently detailed plans for piloting and evaluating the solutions, coupled with the weak connection to climate change mitigation, suggest that the budget may not fully support the comprehensive execution and realization of the project's goals.

Considering the weak quality of the work plan the application does not demonstrate a good value for money relation.

Eligibility

- Are the cost category specifications (external services, equipment, infrastructure and work) precise, clear and justified?
- Are there any indications of ineligible costs in the work plan and/or ineligible project partner structures?
- Have the relevant rules for productive investments/infrastructure been followed?
- Have the State aid rules been followed?

**The relevant eligibility rules seem to be partly followed.**

The cost categories specifications (external services, equipment) are partly precise, clear and justified. Several of the external expertise items require further clarification since the specification is not clear enough e.g. "Equipment for pilot mobility measures". Some items connected to pilots by PP08 (e.g., "external service bike taxi for children and young people" or "equipment such as tandem and electric test bikes available at schools/key infrastructure locations") would require additional justification in terms of necessity and cost-effectiveness.

The planned expenditures in these categories are eligible from the financial point of view. Some of the costs included in cost category no 4 (External expertise and services) seem to suit more into other cost categories, e.g. "NaboGo App" or "licenses for platforms" to cost category 5 (Equipment).

The project plans a budget for the travel of external experts (pilots, workshops). According to the Programme rules, travel and accommodation costs for external experts and speakers are eligible if their participation is justified and contributes to the project content and activities. The active role must be ensured.

However, there are no indications of ineligible costs in the work plan/activities.

There are no indications of ineligible project partner structures (e.g. umbrella partnership, hidden partner organizations).

Productive or infrastructure investments are not planned in the project. However, some items listed in cost category no. 4 (e.g. "mobility services for two mobility hubs" + "mobility points service design") or category no. 5 (e.g., "Equipment for pilot mobility measures in Stockholm," "electric test bikes at key infrastructure locations") could imply potential investments in existing infrastructure. This possibility requires further detailed analysis. If infrastructure investments are present, all involved partners must confirm compliance with the rules and have the necessary resources.

The State aid rules relevant to the application stage have been followed.

The basis for the State aid assessment is the ex-ante assessment of State aid risks associated with the types of project partners and their activities. Furthermore, the MA/JS carried out a partner and plausibility check in accordance with the rules of the Programme Manual.

As part of this procedure, the MA/JS looked at the State aid relevance of project partners no. 02-08 with a low risk of implementing State aid relevant activities to ensure that these partners indeed comply with the State aid rules.

Further, the MA/JS carried out plausibility checks for project partner no. 01 with medium to high risk for implementing State aid relevant activities as requested in the application.

The MA/JS concluded that

- There are no State aid relevant activities in the project.