



# Assessment Sheet

## 1. Identification

<b>1.1 Name</b>	Smart Management for Advanced Recycling Transportation - Carbon-optimized Handling of Organized Integrated Circular Economy
<b>1.2 Short name</b>	SMART CHOICE
<b>1.3 Programme priority</b>	3. Climate-neutral societies
<b>1.4 Programme objective</b>	3.3 Smart green mobility
<b>1.5 Project implementation</b>	36 months

<b>1.6 Project summary</b> (imported from the application)
<p>The Smart Choice project focuses on emission mitigation and efficiency improvement solutions for urban logistics and construction sector and especially for optimised site demolition logistics. It aims to integrate building and infrastructure data throughout the life cycle of construction and building projects, up to the end-of-life Deconstruction Information Model (DIM). The project focuses on creating an effective open-source DIM based decision support tool (DST) that embeds data into construction and demolition processes and generates scenarios how to organise circular economy logistics. The tool simulates and optimises the demolition process via scenarios, considering logistics carbon budget, costs and time. The DST incorporates mathematical models and algorithms that consider trade-offs between time, cost, and environmental impact. The SMART CHOICE DST will be piloted and tested in participating countries. Knowhow from the project will be shared among project partners. The results will also be disseminated to the wider target groups via engagement hubs. A governance model will be established to support the long-term impact of the project results. The project aligns well with the BSR Smart green mobility call with inclusion of city and authority use cases, pilots and collaboration for a green and well-functioning cross-border mobility system, which is crucial for regional development. The project also enhances logistics efficiency and accelerates digitalisation.</p>

<b>1.7 Financial resources</b> (all amounts in Euro)	<b>Planned project budget</b>
ERDF co-financing	1,674,714.24 €
Own contribution EU partners	418,678.56 €
<b>ERDF budget</b>	<b>2,093,392.80 €</b>
NO co-financing	0.00 €



Own contribution NO partners	0.00 €
<b>NO budget</b>	0.00 €
<b>Total Programme co-financing</b>	1,674,714.24 €
<b>Total own contribution</b>	418,678.56 €
<b>Total budget</b>	2,093,392.80 €

1.8 Project partnership						
No.	Organisation		Partner budget	Programme co-financing	State aid relevance	Took part earlier
1	Swedish Transport Administration	SE	130,500.00 €	104,400.00 €	Yes	Yes
	Sectoral agency					
2	Building information foundation RTS	FI	218,128.40 €	174,502.72 €	Yes	No
	Interest group					
3	Vediafi Ltd	FI	348,531.40 €	278,825.12 €	Yes	No
	Small and medium enterprise					
4	Construction Sector Development Agency	LT	87,204.00 €	69,763.20 €	Yes	Yes
	Sectoral agency					
5	Transport Innovation Association	LT	299,460.60 €	239,568.48 €	Yes	Yes
	Business support organisation					
6	Alytus city municipality	LT	194,408.00 €	155,526.40 €	No	Yes
	Local public authority					
7	Union of Harju County Municipalities	EE	111,766.00 €	89,412.80 €	No	Yes
	Regional public authority					
8	Linna Business Development Ltd	FI	260,000.00 €	208,000.00 €	No	Yes
	Local public authority					
9	TREVIO, JSC	LT	197,662.40 €	158,129.92 €	Yes	No
	Small and medium enterprise					
10	Saku Municipality	EE	245,732.00 €	196,585.60 €	No	No
	Local public authority					



1.9 Associated Organisations		
No.	Organisation	Country
1	Lindholmen Science Park AB	SE
	Higher education and research institution	
2	Ministry of Climate	EE
	National public authority	

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"> <li>SMART CHOICE tool</li> <li>Data model for deconstruction (Deconstruction Information Model) and decision-making tool model optimisation</li> <li>Smart Choice Engagement hub</li> </ul>

## 2. Admissibility check

OUTCOME OF ADMISSIBILITY CHECK
The project passed the admissibility check.

## 3. Final conclusion and requirements

FINAL CONCLUSION
<p><b>The proposal does not demonstrate sufficient quality to be approved.</b></p> <p>The project targets the construction sector, specifically demolition and circular economy logistics in urban areas, aligning with the Programme objective. However, key sections of the application are weak. The project presents a plan for developing a data management system without offering a convincing solution for addressing the interoperability challenges in construction demolition waste logistics identified as a crucial element by the project itself. The solution, focusing on data collection and</p>



management, lacks details on systemic uptake and stakeholder collaboration. Important target groups, like construction and public transport companies, are not actively involved. The work plan lacks details on pilot locations, and the durability plan is vague, with no clear responsibilities for sustaining the solutions.

#### REQUIREMENTS FOR APPROVAL

As the project does not demonstrate sufficient quality, no requirements are listed.

#### Quality assessment

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

#### I. Relevance of the proposal

SCORE

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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 sufficiently matches the selected Programme objective and the focus of the given call.**

The project focuses on the construction sector, such as demolition and circular economy logistics in urban areas. It addresses the lack of interoperability in the logistics of construction demolition waste. It intends to develop a decision-making tool for demolition targeted at local authorities to improve the efficiency and circularity of demolition waste and its transport. This challenge, in general, sufficiently matches the Programme Objective. Nevertheless, the overall description in the challenge section is rather broad and often confusing. For example, the project references the underdeveloped circularity of building and waste materials but ultimately focuses on transporting waste from demolition sites to recycling centres. The overall challenge the project refers to is the lack of interoperability in this sector. Still, it provides no further information on how far the lack of data the project intends to collect is a pressing problem for improving this interoperability. Furthermore, the project does not provide any insights into the existing logistic systems regarding participating stakeholders, division of responsibility, the set-up of the existing logistic chains and the exact shortcomings the project wants to solve. At the end of the description, the project refers to the potential this challenge holds for connecting "policymakers, urban planners, construction operators, recycling services and the other private sector, (...) to achieve economically and environmentally sustainable solutions for waste logistics", however, it finishes the section with writing



that the planned tool will improve the transparency of demolition data without explaining how far the transparency of the data can improve the weak collaboration among the actors.

The selected challenge matches Programme Objective 3.3 Smart Green Mobility. Nevertheless, considering the vague descriptions, it is unclear whether the focus is precisely on 3.3 or instead on 3.1 Circular Economy.

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

The project intends to address climate change within the thematic framework of Priority 3 as set out in the Programme Document through more efficient logistics and circularity of construction demolition waste. Although the project does not directly refer to the specific requirement of the current call from the provided descriptions, it can be concluded that it targets reducing emissions. It also seems to connect to the thematic challenge of adopting and implementing better integrated and more systemic approaches to planning processes in sectors that mitigate climate change. In this case, it is the construction sector connected to the transport sector.

#### 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 sufficiently 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, infrastructure and public service providers, large enterprises, SMEs and NGOs. The target group represents various institutions with different tasks and responsibilities in solving the challenge. The needs of the target groups are vaguely described and partly seem relevant to the identified challenge. The defined field of responsibility and economic sector of the selected target groups seem relevant to tackling the identified challenge. What remains unclear, however, is the planned division of responsibilities and tasks among the target groups in the context of the challenge (for example, who has to provide the data, what agreements are needed for the system to work, who will use the data and how, etc.) and how the project will achieve cooperation and system interoperability. There is no information on how the project plans to connect the various target group members with the tool or during the development of the tool. It is also unclear how the project manages to support all target groups with different responsibilities with homogenous solutions.

The project could have provided more specific information on each target group in terms of their needs and role in the process to understand who are the primary target groups who will use the planned solution in their everyday work and which are the organisations that have a supporting or advisory role in the process. For example, local public authorities have different responsibilities and competencies in construction demolition waste logistics than infrastructure, public service providers, and large enterprises. The project does not clearly explain the differences, complementarity and specifics.



The geographical coverage of the target groups seems to be appropriate for the proposed challenge. There are four participating countries: Finland, Sweden, Lithuania and Estonia. However, the project does not provide details regarding the selection of countries in the application. For some target groups there is no selection of countries, e.g. for large enterprises it is not indicated (and there is no link through the partnership), while in other cases, e.g. for infrastructure and public service providers, whole BSR is mentioned which does not seem likely with this partnership composition. When it comes to SMEs, fewer countries will be covered (Finland and Lithuania).

#### Transnational value

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

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

The project only vaguely explains the need for transnational cooperation from the need for a holistic and standardised approach and the need to develop a data foundation that reflects a variety of use cases and scenarios available in different countries. Furthermore, the project mentions the need for harmonisation, standards development and uniform tools to report carbon reduction. While these arguments are relevant for transnational cooperation and the challenge in theory, overall, the practical plans for the joint development, testing, evaluation, and transfer of project results across diverse regional contexts have not been proven. It is unclear how the project plans to achieve the various regional perspectives from the partner countries and standardisation and harmonisation processes in real life through the planned solutions. The project could have provided more details regarding the context of the chosen geographical area for the partners, e.g., the state of waste management infrastructure, existing regulations and policies in the region regarding construction demolition waste, and technologies in use.

#### Project objective

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

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

It is weakly explained how the project aims to address the challenge.

The project rightly identifies the lack of interoperability as a critical challenge in demolition waste management and transport systems. However, it fails to address how the proposed tool will effectively tackle this issue. The project does not clearly articulate how the tool will foster improved collaboration between stakeholders or facilitate the harmonisation and standardisation of processes, which are critical to overcoming interoperability challenges. The descriptions mainly focus on how individual stakeholders will be better informed about demolition waste and recycling options but fail to address how these improvements will translate into better cooperation and streamlined workflows in the system. This leaves a significant gap in understanding how the tool will resolve the underlying problem of fragmented processes.



Additionally, the project provides insufficient clarity about the primary users of the tool, their specific needs, and their roles in contributing data to the system, particularly from the perspective of waste logistics. Without a clear explanation of how these stakeholders will be integrated into the tool's ecosystem, it is difficult to assess whether the tool will address the needs of those involved in waste management or merely provide data without facilitating the necessary collaboration for meaningful change.

While the project suggests that the tool could improve data availability for local public authorities, infrastructure and public service providers, and large enterprises, it does not adequately analyse these target groups' unique needs or responsibilities. Without this understanding, it remains unclear how providing more data will solve the complex challenges identified—such as reducing emissions and promoting circularity in the construction waste management sector.

#### 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 the implementation of the Action Plan of the EUSBSR. It contributes to the Policy Area Transport by developing climate-neutral and zero-pollution transport measures and facilitating innovative technologies and solutions in the BSR. The project plans to contribute to achieving specific goals or implementing actions of other strategic documents relevant to the Programme area. The project plans to contribute to the following strategic documents:

- PA innovation – challenge-driven innovation, digital innovation and transformation and co-creative innovation
- EU-commission Transition pathway for Construction
- EU Strategy for Sustainable and Smart Mobility

#### 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 weakly explains how outcomes of other projects have been taken into consideration. The project primarily references previous initiatives implemented in Finland, yet it fails to clearly distinguish



where those projects' achievements conclude and where this new initiative aims to build upon or scale these outcomes within the broader Baltic Sea Region. Without a clear explanation of how the project intends to enhance, adapt, or expand the results of the Finnish projects, it is difficult to determine whether it will deliver meaningful, region-specific solutions or merely replicate existing efforts.

The application shows sufficient additional value to already implemented or currently running projects financed by Interreg BSR or other Programmes and initiatives. The project does not seem to be repeating activities from earlier or current Interreg BSR projects or projects from other programmes in the region.

The project does not plan to cooperate with other projects.

## II. Partnership

SCORE

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### Partnership

- 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?

**The partnership seems to have weak potential to realise the planned activities and to achieve the planned objective.**

The partnership seems to possess weak competencies for implementing the planned project.

The project's selected target groups are only partly involved in the partnership. Target groups of local public authorities and SMEs active in the digital technology development sector are engaged as partners. Organisations from the following target groups are missing in the planned partnership: large enterprises, infrastructure, public service providers, and NGOs.

The partnership comprises two sectoral agencies, two SMEs, three local public authorities, one regional public authority, one interest group and one business support organisation. The organisations participating in the project have adequate competencies to develop the solutions successfully from a technical point of view. There is also some level of engagement from local authorities to have the solution tested with them. Nevertheless, the project lacks the involvement of infrastructure, public service providers, and large enterprises representing the construction sector, which are crucial stakeholders in planning and implementing the logistic chain. Their engagement in the development of the tool would be vital to gaining insights regarding the needs of those companies when managing and transporting construction demolition waste and the barriers of interoperability. Also, the project writes that they will





be the primary customers using the tool once it is ready. Even more so, their engagement would have been essential for the project implementation.

The roles and tasks of all partners in the project implementation are sufficiently explained.

The involvement of the partners is planned in accordance with the requirements of the Programme.

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).

The roles and tasks of associated organisations are sufficiently explained. The role of Lindholmen Science Park AB is clear. They seem to bring additional value to the proposal. The role of the Ministry of Climate in Estonia appears to be a passive follower, and they do not have any active role in the implementation of the activities.

Certain risks seem to be associated with the private project partners. Project partners 2 (Building Information Foundation RTS) and 3 (Vediafi Ltd) do not seem to have sufficient financial capacity to implement the planned activities. Their operating profits are 0,00 and -8,707 EUR, respectively. In addition, project partner 2 has an annual turnover indicated as 0,00. Should the project be selected, these partners will have to clarify and justify their financial capacity.

### III. Work plan

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#### Preparing, piloting and evaluating, transferring solutions

- 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?

**The overall quality of the work plan presented in the application is weak.**

It seems that the planned solutions only partly address the identified challenge.

The challenge identified by the project is the lack of interoperability in the logistics of construction demolition waste. It intends to develop a decision-making tool for demolition targeted at local authorities to improve the efficiency and circularity of demolition waste and its transport. The planned tool seems to address the challenge only partly as it intends to provide primarily data to local authorities and, to some extent, infrastructure and public service providers but seems to lack important aspects of connecting the end users - large enterprises (who do not seem to be engaged in the project at all) with the other two user types.



There is a partly clear approach as to how the project plans to develop the solutions.

The project aims to develop three solutions:

- SMART CHOICE tool,
- A data model for deconstruction (Deconstruction Information Model – DIM) and a decision-making tool model optimisation,
- A Smart Choice Engagement Hub.

In Work Package 1 (WP1), the project outlines the planned elements of the data model in reasonable detail. It also indicates that data will be sourced from scheduled pilots (unfortunately without mentioning any details regarding these pilots, no location or agreement with the relevant organisations etc. is highlighted) allowing the assessor to estimate the structure of the digital tool. Whether the SMART CHOICE tool will include the data model as an integral part or whether the two elements will exist independently remains unclear. Although there is sufficient information on what will be developed there is limited information on how the GoAs will be implemented. Details on the engagement of the target groups and distribution of work among partners and their specific roles at different stages are lacking. Although the project states that partners will be involved, this information is mainly theoretical.

Similarly, regarding the development of the Hub, the project does not specify how many hubs will be established, which partners will host them, or their roles in project implementation and piloting. The information provided is generic, leaving many questions unanswered and suggesting that many agreements will only be finalised during the project's implementation. The generalisation of the descriptions leaves many uncertainties about the potential of the project to achieve the aim of delivering a tool suitable to the target group needs. There is also uncertainty to which extent the project can reach out to the relevant target groups as these are mostly missing as partners and there is no confirmation provided by the project on their interest or commitment to the project.

The project plans pilots to validate the usefulness of only one of the solutions (we suppose that the SMART CHOICE tool and the data model, although indicated as two outputs, will be integrated as one, hence the reference to one lacking pilot in this section). There are piloting plans for the data model in partner cities of the project, but there are no evident plans for piloting the hubs.

Similarly to WP1, the descriptions in WP2 are only generic. While some pilot sites are specified in the application (though not in the work plan section only in the description of the role of the partners), there is a lack of concrete details on how the pilots will be executed.

Understandably, many details will emerge during the preparation phase. However, to ensure the success of the pilots, it is essential to provide more specific information about the participating organisations. The project only mentions stakeholders in general and refers to one waste management company that has agreed to participate.

E.g. from the application:



- site 1 could be new building construction project and demolition of old building;
- site 2 could be infrastructure project where new bridge is built with focus of re-usage of soil masses;
- site 3 could be new building with focus on re-usage materials;
- site 4 could be new public building with focus on re-usage of soil masses.

This level of detail is insufficient for several reasons. Without concrete plans, especially in a project that requires cooperation among many types of organisations and commitment from known demolition sites to cooperate and provide data to the project, it is impossible to assess the feasibility and reliability of the pilot actions. Furthermore, information about participating organisations and their roles is vital for effective collaboration and commitment.

The project plans to evaluate only one of the solutions, or at least it intends to evaluate the results from the pilots in GoA 2.2 and provides basic information only on how it plans to adjust the solution based on the results from the pilots. GoA 2.2 refers to the data model; however, the usefulness of the hub is not planned to be tested or evaluated.

The project plans to communicate and transfer the ready solutions insufficiently. Again, the project kept the descriptions on the general level. It is unclear how the specific target groups will be reached, especially the large enterprises and infrastructure and public service providers, who are the solution's primary target users and seem not to be realistically covered by the plans. The unclarity of their engagement also underlines their lack of representation as partners or associated organisations in the project.

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

The project does not seem to encourage active and continuous use of the solutions after the project end. Although the project plans to communicate its results, most of the activities are left vague, to be determined by the partnership during the project's implementation. While it is understandable that some details will become clear only with experience, the project should have provided more detailed plans for engaging relevant organisations and target groups. In the lack of such information, it is challenging to assess how the project will maximise its impact and ensure that the results reach the intended audience.

#### Target groups

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

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

In the preparation, piloting and evaluation of the solution, the involvement of the target groups is weakly planned.

Across the work packages, only the engagement of two local public authorities who are project partners is ensured. The role and engagement of the remaining crucial target groups, especially of the large enterprises as end users remain unclear. Furthermore, from the work plan details it seems that the project did not accommodate the requirements of the Programme on target group engagement in the



preparation, piloting and evaluation of the tool. Target group engagement is a vital requirement in Interreg BSR, on the one hand, to be sure that the planned tool is something the target group needs and is willing to integrate into their everyday work, second through closely engaging them also as partners in the design of the tool, the testing and evaluating the tool will respond to the experiences and needs of the end users. Unfortunately, the project does not seem to have integrated these elements sufficiently neither in the work plan nor through the partnership.

#### Transnational cooperation

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

**The project weakly plans to implement activities and outputs in a transnational setting.**

The preparation, piloting, evaluation and transfer of the solutions are weakly planned transnationally. For instance, in the pilot preparations and implementation in WP1 and WP2, the project does not mention the cooperation among the partners. Although the division of the tasks in the work plan and the roles of the partners in each of the GoA refer to the tasks where the partners will be involved, in the descriptions there is little to no indication of how the tasks will be implemented together e.g. regular meetings, shared tasks etc. to ensure the exchange among 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 4*

*RCO 116 – Jointly developed solutions 3*

*RCO 87 - Organisations cooperating across borders 12*

*RCR 104 - Solutions taken up or up-scaled by organisations 3*

*PSR 1 - Organisations with increased institutional capacity due to their participation in cooperation activities across borders 15*

The set targets seem to be realistic except for the number of solutions. Due to the lack of piloting for some planned solutions, the correct number appears to be one solution and one pilot action as defined by the Programme rules. Furthermore, the weak plans to transfer the solution and the uptake by the target groups are also reflected by the target value of PSR1, which only calculates with three additional organisations with increased capacity beyond the partnership.

#### IV. Durability

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### Durability of the outputs

- 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?

**The use of the developed solutions in different countries, also after the project end, is weakly planned in the application.**

It seems that the solution will not be used by the target groups beyond the implementation phase in their daily work. As highlighted in the sections above, the project weakly plans to actively engage the primary target users (large enterprises, infrastructure, and public service providers). In the pilots, their role is not evident, only the role of the local authorities. Also, the transfer activities towards these organisations remain theoretical, considering the type of organisations in the composition of the partnership and the vaguely described plans. It is unclear how target group members other than the local authorities engaged in the project will gain knowledge about the tool and be able to use it after the project ends in their daily work.

The durability concept is not clearly described. It does not include institutional and financial support to keep the outputs functional after the project end.

The project lacks a clear allocation of responsibilities for maintaining and sustaining the solutions among the partners. For example, while there are theoretical plans for maintaining the hubs, these plans do not include any concrete commitments from the partners. Specifically, the roles and responsibilities of the partners regarding the hubs are not well-defined. As a result, the future of these hubs and their long-term institutional value beyond the project remains unclear and unrealistic. Similarly, the project did not provide details on the roles and responsibilities of the partners in maintaining the SMART CHOICE tool and the data model.

## V. Budget

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### Budget adequacy

- Is the budget appropriate in relation to the planned activities, outputs, results, and involvement of partners?

**The planned budget seems weakly aligned with the planned activities, outputs, results, and partner involvement.**

The planned partner budgets seem partly adequate considering their involvement and responsibilities in the project. The biggest concern seems to be the lack of financial resources planned for project management, even though the project allocated 10% of the budget to it. Based on the description in the application form the role of project coordination is taken by the Lead Partner. No other partner seems to contribute to it. It is written that the project coordination will be externalised, however, there is no budget planned for such activities neither for the Lead Partner nor for any other partner. Considering the given hourly rate for the LP country and the planned budget for the staff, it seems that the LP allocated only 0.2



(full-time equivalent) employee involvement for the entire project implementation, which also might indicate that the human resources planned is not sufficient to coordinate the entire project.

The planned shares of management and work packages seem partly adequate considering their importance for the planned outputs/solutions and results. The project allocated most of the funds (40%) to WP1, which is a preparation phase. This might indicate that too much of the financial resources would be spent on planning and analysis, which partly should be done during the application's preparation. In addition, the financial resources planned for management (as mentioned above) are not clear.

The planned total budget does not seem adequate considering the planned outputs and results. The project does not propose a durable and transnational solution(s) worth the requested budget. The partnership seems to lack an important target group, the relevance to the Programme and the work plan is of weak quality, and the durability concept is not clearly described. Together with the budget shortcomings, 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 specifications for the cost categories (external services, equipment, infrastructure, and works) are partly precise, clear, and justified. The main concern is related to two items planned in cost category 4 (external expertise and services). One item is planned by project partner 8 and is described as WMC Ltd (owned by 13 municipalities) has maybe the opportunity to offer one pilot site. Communication. First, the name of the contractor is already mentioned, however, according to the planned value (25,000 EUR), a transparent selection procedure is required. Second the description does indicate what kind of costs are planned. Third, it is written that WMC is owned by 13 municipalities, however, in the description of the group of activity 2.1, it is written that the pilot will be offered by the project partner 8 (Liina BD) which is also owned by 13 municipalities. Shall the project be selected for approval such inconsistency must be clarified as it might indicate an umbrella partnership (Linna BD -> WMC LTD). An additional concern is related to the expenditure item planned by project partner 10 (Saku Municipality) – 24,400 EUR. The description of the item is Local circular economy ecosystem mapping (Saku Municipality). This description suggests that the contract will be awarded to Saku Municipality which might indicate an internal invoicing that is not eligible for the Programme co-financing.

Despite the above-mentioned findings the remaining planned expenditure seems to be eligible from the financial point of view. There are no other indications of ineligible costs in the work plan/activities nor ineligible project partner structures (e.g. umbrella partnership, hidden partner organisations).

Productive or infrastructure investments are not planned in the project.



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.

