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**Business Regulatory, Investment,
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(BRITE)**

BUSINESS REGULATORY, INVESTMENT, AND TRADE ENVIRONMENT PROGRAM

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ACRONYMS

AEI	Alliance for European Integration
AEO	Authorized Economic Operator
AITA	Association of International Automobile Transporters
AmCham	American Chamber of Commerce
ANSA	National Food Safety Agency
APA	Academy of Public Administration
ASYCUDA	Automated System for Customs Data
ATIC	Association of Private IT Companies
BCP	Border Crossing Point
BizCLIR	Business Climate, Legal, and Institutional Reform
BIZTAR	Business Regulatory and Tax Administration Reform
BRC	Business Research Company
BRITE	Business Regulatory, Investment, and Trade Environment Program
CISC	Citizen Information and Service Center
CNAS	National Social Insurance House
CPAS	Social Insurance Personal Number
CRM	Compliance Risk Model
DCFTA	Deep and Comprehensive Free Trade Agreement
DCOP	Deputy Chief of Party
DG	Director General
EBA	European Business Association
e-Gov	E-Government Center
EIF	Economic Integration Forum
EUBAM	European Union Border Assistance Mission to Moldova and Ukraine
FEZ	Free Economic Zone
FSI	FiscServInform
GOM	Government of Moldova
HS	Harmonized Commodity Description and Coding System
ICP	Inland Customs Point
IDNP	Personal Identification Number
IFC	International Finance Corporation
IMF	International Monetary Fund

IPR	Inward Processing Relief
LGSP	USAID Local Government Support Project
MCS	Moldova Customs Service
MOE	Ministry of Economy
MOF	Ministry of Finance
MSTI	Main State Tax Inspectorate
NBS	National Bureau of Statistics
NCFM	National Commission on Financial Markets
NCTS	New Computerized Transit System
OSS	One-stop-shop
PCA	Post Clearance Audit
PMEP	Performance Monitoring and Evaluation Plan
RFP	Request for Proposals
RIA	Regulatory Impact Assessment
Sida	Swedish International Development Cooperation Agency
SCP	Simplified Clearance Procedures
SRC	State Registration Chamber
STS	State Tax Service
TAB	Trading Across Borders (World Bank “Doing Business”)
UNCTAD	United Nations Conference on Trade and Development

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EXECUTIVE SUMMARY

New government formed, policy briefing book presented, met with new MoE,

Program Highlights and Successes

Following the elections at the end of the last quarter, a new Government was formed and approved by Parliament in late February 2015 and is led by a minority coalition of the Liberal Democratic Party and the Democratic Party. Much of the leadership relevant to BRITE and its activities remains the same with the exception of the Prime Minister, Mr. Chiril Gaburici, and the Deputy Prime Minister and Minister of Economy, Mr. Christophe Stephane Bride - a French national with Moldovan citizenship. Both have previously worked in the private sector. The delay in forming the government also delayed some of BRITE's legal initiatives since some draft laws were recalled for review by the new Cabinet. Despite these days, BRITE advanced most of its ongoing activities in all project components. The following are highlights of the major achievements of the project over the last quarter. These, and other activities, are discussed in greater detail later in the report.

- Four new functionalities for the enhancement of the Taxpayer Current Account were developed and tested.
- E-Import was launched nationwide on March 1. The number of e-declarations for import is now slowly increasing.
- Assessment of the ASYCUDA World system completed.
- Adjusted ASYCUDA to eliminate the need for a mandatory paper-based bar-code indicator in case of electronic declaration.
- Completed STTA assignment on EU TARIC and developed recommendations for reforming trade permits and consolidating them into an EU compliant integrated tariff.
- Government initiated a new round of consultations to re-approve the amendments on trade authorizations;
- The legal framework and ToR on establishing OSS for construction permits have been developed and discussed with the main stakeholders representing the construction industry;
- The legal framework on establishing the OSS for permits issued by ANSA in connection with import-export operations completed.
- Researched and developed the concept of the BRITE Business Media Program 2015-2016 and commenced the selection process of the participating media companies.
- Supported the STS informational campaign regarding the new deadline for tax filling.
- Launched communications trainings project for the MCS.
- Hired new Strategic Communications Specialist Ruxanda Nedelciuc to lead the component while Strategic Communications Advisor Olesea Galusca is on maternity leave and following the resignation of Communications Specialist Anastasia Taburceanu.

SECTION I: PROJECT RESULTS BY COMPONENT

A. Component 1: Tax Administration and Trade Facilitation

A1. Project Intermediate Result 1.1: Improved tax administration reduces the administrative burden of paying taxes while increasing revenue collection

Support the STS to enhance the Taxpayer Online Current Account to the benefit of taxpayers and the STS (1.1.1).

BRITE this quarter finalized the development of all four new functionalities to the Current Account, according to the signed Action Plan. The first functionality regarding accounting of the transactions by localities was completed in January by BRITE's subcontractor DAAC Systems Integrator. DAAC made a demonstration of the methodology of using the new functionality related to entering data, record keeping and procedures for calculating the balances by localities, based on the test data provided by FiscServInform (FSI). Also presented were examples of the reports by localities. Following the development, BRITE, together with STS and FSI, worked on testing this additional functionality. All parties were satisfied with the results and signed the Act of Acceptance.

By the end of February DAAC completed development of the other three functionalities: (i) implementation of the electronic register of certificates on the absence/existence of debts to the national public budget; (ii) development of a tool for the generation of ad-hoc reports, based on pre-defined data sets; and (iii) elaboration of an additional report on penalties. A demonstration of these functionalities for STS and FSI experts was done at the beginning of March. BRITE, together with STS and FSI, then began the testing process which was finalized at the end of the month.

Taking into consideration that all new functionalities have been tested using the test database, the next step will require testing the functionalities by STS/FSI specialists on the production platform. According to the signed Action Plan, all the described enhancements should be implemented not later than mid-May 2015.

We also expect by that time the amendments to the legislation regarding the on-line access of the other public authorities to the information on absence/existence of taxpayers debts, that are now in the Government, will be approved by the Parliament, allowing us to begin activating this feature and eliminating paper certificates.

Streamline the tax payment system to reduce the number and frequency of individual tax payments, including social payments (1.1.2).

This quarter BRITE held discussions with MoF and STS experts on the next steps to be taken for reducing the number of individual tax payments made by economic operators that were proposed in BRITE's report on a single payment mechanism, presented last quarter. The two parties hold different positions regarding the timeline for development of the IT solution, however. While STS wants to start implementing the proposed concept as soon as possible, MoF prefers to work

on this only after the new Public Finance Management IT System will be introduced. Unfortunately, it was not possible to reach a consensus during the joint discussions. Following this, the Treasury has prepared an Informative Note for the Minister of Finance, Mr. Anatol Arapu. The Minister has instead has proposed to organize a meeting with the heads of all affected institutions to decide on the way forward. We are now working with STS and Treasury to ensure this meeting is scheduled as soon as possible.

Identify and implement other measures to streamline tax administration (1.1.3).

BRITE continued to promote its recommendations for streamlining the process of voluntary liquidation. This is covered in more detail in Component 2 below.

A2. Project Intermediate Result 1.2: Time and cost of moving goods across borders reduced

A2a. Introduce Refined Compliance Risk Model

Implement Blue Lane according to the work plan approved by the MCS (1.2.1).

Amendments to the Customs Code prepared by BRITE to allow for Blue Lane processing of customs declarations as a normal procedure were approved by the Government as part of the Tax and Customs Policy law for 2015 at the end of the quarter. We expect Parliament to approve the draft law by mid-April, which will trigger implementation by MCS. Amendments to clarify the procedures for desk audits that would result from Blue Lane processing were also included in the law.

MCS this quarter also produced a draft guide for conducting re-verifications (desk audits). This is being reviewed by BRITE's Customs and Trade Advisor Nigel Moore and will be finalized during his next assignment in Moldova in April. We hope to launch the Blue Lane officially in April.

Assist the MCS to develop its 2015 Strategic Risk Assessment Plan; target a success rate of at least 20 percent by the end of Year 3 (1.2.2).

During Mr. Moore's visit in February, the MCS Head of Enforcement, Iurie Ceban, approved an annual risk management planning process that includes the establishment of a high-level monthly monitoring group to review risk management interventions, their results, and the department's progress toward the high-level targets. These targets were set at the beginning of the year at 10% - Red Lane, 20% Yellow Lane, and 70% Green Lane. The first few months of the quarter indicated fewer than expected Green Lane declarations, meaning the criteria still are set too strictly, mostly in the area of valuation. Initial data from the end of the quarter show a slight increase in Green Lane approvals, but still well below targets. This will be the focus of Mr. Moore's next visit to Moldova in April.

Also during the last visit, BRITE led a 2-day training for risk management staff and others on using sampling as a method of analyzing large amounts of data. The aim here is to introduce more sophisticated methods of risk assessment that can better identify and target risks, more

efficiently apply scarce resources, and treat most shipments as compliant, in accordance with the targets mentioned above.

This quarter we worked with risk management staff to improve their data gathering and reporting to support the work of the high level monthly monitoring group. This also involves some analysis of the data to identify success rates and what criteria can be changed and to present these in a standard reporting template each month.

Because the majority of risk criteria are related to revenue which is often tied to customs valuation, BRITE has been working with the valuation department to make sure its efforts do not undermine the strategic objectives of the risk management department. The department is planning to introduce a valuation database developed by UNCTAD to set price ranges for selected goods. If not adjusted and applied properly this could significantly raise the number of shipments directed to the Yellow Lane for valuation checks, triggering requests for more information and further delaying clearance.

At the same time, analyzing the data provided by risk management on their interventions clearly shows that their criteria are capturing too many shipments, i.e. only 27% of shipments were directed to the Green Lane in the first quarter of 2015. The challenge now is to work with them to better define risk criteria with a focus on valuation and revenue-based criteria.

This quarter, Customs made a formal request to BRITE to provide valuation expertise, particularly as applied in the EU. This will be reviewed in more detail by Nigel Moore during his visit in April, and may result in additional STTA. If so, this should be focused on improving the application of valuation techniques, clear guidelines on the use of the valuation database, and vastly improved valuation criteria.

Organize a study tour to promote Risk Management best practices (1.2.3).

This was completed in December 2014. MCS made a formal request of Finland customs for additional information but has received no response as yet. Nigel Moore will help to follow up on this request during his visit in April.

Promote Joint Border Agency profiling (1.2.4).

This activity will begin later in Year 3.

Develop internal Risk Management Communications Strategy (1.2.5).

This activity will begin later in Year 3.

A2b. Streamline the Import Process

Fully implement Simplified Procedures based on EU norms; targeting 30 percent of all imports using Simplified Procedures by the end of Year 3 (1.3.1).

Despite having the legal procedures in place to implement simplified procedures the customs computer system ASYCUDA must be modified to allow for their full implementation. This is

covered in Activity 1.5.3 below. As part of that work, BRITE contracted an ASYCUDA expert this quarter to review the Moldovan system and how these features could be implemented. Preliminary findings indicate that simplified procedure regulations will need to be modified to be fully implemented in ASYCUDA. At the same time, the periodic declaration needs to be included in regulation but can be activated immediately in the current version of ASYCUDA. These are discussed in more detail below.

Based on these findings, as well as a report from the EU-Moldova working group on customs cooperation identifying some discrepancies between current Moldovan legislation and similar EU legislation, BRITE and MCS began drafting a new set of legislative amendments. These will address the following:

1. Bring Moldovan legislation into compliance with EU legislation on simplified procedures and AEOs. The exception is deferred payment, which MCS refuses to include based on objections from MoF.
2. Implementation of the periodical declaration, as a legal form of simplified declaration (based on the fact that there is already an elaborated and tested IT module in ASYCUDA that may be used immediately).
3. More detailed description of the procedure for local clearance.
4. Legal procedures of using the planned AEO-logo
5. Legal provision on the procedures of approved consignee and consignor as persons legally empowered to start/finalize the transit procedures.

Streamline selected customs regimes based on EU norms (1.3.2).

BRITE local STTA Valentin Armas last quarter completed the draft legal amendments to bring the regimes of customs warehousing and inward processing relief into closer compliance with EU practices. At the request of MCS these will be promoted in two separate packages of legal amendments:

1. Amendments to the Customs Code to implement primary norms, e.g. extending the warehousing term indefinitely, allowing temporary removal of goods without lodging declarations, extending the term of inward processing, etc.
2. Amendments to Government Decision to streamline procedures, e.g. the approval/authorization process, control of goods within the warehouse, etc.

These drafts will also be combined with the draft legal amendments being prepared under 1.3.1 (above) and promoted as a single package for consideration by the Government. The entire package will be completed in April.

Implement Authorized Economic Operator (AEO) program (1.3.3).

Based on last quarter's assistance, the MCS have started the initial pre-audits of AEO applicants. Based on the results of these, which will be known in April, they will advise BRITE of any further assistance they might need. In the meantime, they have made several other requests. These include:

- Developing a Moldovan AEO logo for use by selected AEOs. This should be in line with EU requirements but unique to Moldova.

- Assisting in drafting revisions to AEO legislation based on comments received from an EU working group on mutual recognition. BRITE has already started to develop these and should complete the drafts in April (see 1.3.1).
- Developing key performance indicators for AEO monitoring and evaluation.
- Mapping and documenting processes related to AEO application, review and approval; developing web-based information and on-line applications, i.e. an AEO web page.
- Supporting a special sub-committee of the Consultative Committee on AEO's
- Organizing a survey of AEOs to gauge level of satisfaction, identify gaps, improvements, etc. This would be done toward the end of Year 3.

MCS is also receiving direct assistance from Turkey and the EU (Lithuania) on AEO implementation. Nigel Moore, during his next assignment in April, will assess with MCS the status of this assistance and determine whether further assistance is needed from BRITE.

Introduce Electronic Import System; targeting 25 percent of all import declarations to be submitted electronically by the end of Year 3 (1.3.4).

After an initial pilot program at two border crossing posts – Tudora and Sculeni, full electronic (paperless) import became possible at all BCPs as of March 1, 2015. MCS officially announced this change, but has been slow to promote it, as well as ensure it is fully operational. Some planned enhancements of ASYCUDA will solve some of these problems, but not all.

This quarter, MCS delivered several presentations on e-Import to customs brokers and major importers to promote the feature and to get their feedback on the process. During these, MCS discovered some of the major issues with implementation, namely:

- The requirement to lodge the SAD at least one hour before the arrival of the truck at the BCP. In the opinion of many, not being able to review the accompanying documents and shipment creates a risk for a non-authentic declaration, which in Moldovan law can result in penalties of 40-100% of the value of the goods. In their view, MCS must address either or both of these aspects to generate more interest e-Import.
- Any shipment directed to the red lane requires a transit declaration, which cannot be lodged electronically.

BRITE is planning more outreach with MCS in the coming quarter to identify implementation obstacles and raise them with Customs. Once these obstacles have been solved, we will work with MCS to develop an official communications plan for e-Import.

Introduce deferred payment of duty and taxes on imports (1.3.5).

To further promote the deferral of duties and taxes and speed the release of shipments, BRITE conducted a survey of 100 importers to understand better the costs associated with pre-payment of trade revenues and what sort of deferment scheme might work best in Moldova. Based on these results, we drafted a report on the findings and the need to introduce duty deferral as a trade facilitation measure.

Key Findings of Survey of 100 Importers – January 2015

- Of the 100 traders surveyed, 31% were holders of “simplified customs procedures”, many of which are now designated Authorized Economic Operators by the Moldova Customs Service.
- 60% of respondents would use a duty deferral scheme if given a chance; among AEOs the response rate was 70%.
- The average deferral period preferred was 12.6 days;
- 20% of respondents pay their customs revenues in advance; another 20% regularly overpay calculated amounts.
- 35% of respondents take bank loans for paying customs revenues, most of them for a period of two months or more.
- 51% of respondents experience delays in release of goods when paying customs revenues; 8% of those report delays occur often.
- 65% of respondents reported being fined at least once in the last three years because of delayed or incorrect payment of customs revenues.
- Only 10% of respondents have never experienced delays because of incomplete payment of customs duties.

To address the concerns of the Ministry of Finance (MoF), BRITE’s report makes the case for introducing duty deferral initially for AEOs. Based on data from the survey and from the MCS, AEOs account for about 5.7% of all customs revenues. If 70% of these were deferred the initial shortfall would be less than 0.2% of the State Budget. Furthermore, the EU’s assessment of simplified procedures and AEO legislation in Moldova noted the lack of a provision for guarantees for (deferred) import duties and other charges. BRITE is translating the report for wider distribution in April.

Reduce the number and streamline the issuance of import permits (1.3.6).

BRITE’s STTA Silvia Vilcu completed the initial legal analysis and inventory (database) of all import permits according to existing law and applied them to their HS commodity classification code. A total of 11,646 of tariff positions have been reviewed and verified from the total amount of about 14,000. The remainder is being reviewed by MCS and will be completed in early April. Ms. Vilcu also identified streamlining opportunities related to the categories of goods and types of permits. Once completed, this will require legal and procedural reforms that will eventually be codified into an integrated tariff that can be a single source of legal information on all trade regulations and, later, integrated into ASYCUDA as a tool for MCS expedite the release and clearance of goods.

BRITE this quarter invited an expert in the EU Integrated Tariff (TARIC) to help promote this idea, as well as to introduce MCS and other trade regulation authorities to the need for a true integrated tariff in Moldova. The expert, Ms. Vida Mickiene, is the head of the tariff division of Lithuania Customs and an expert in TARIC. During her assignment she conducted several workshops with MCS and other authorities on the EU TARIC, its use, structure, legal basis, and

reviewed BRITE and MCS' plans for introducing a similar system in Moldova. Her findings and recommendations are included in a separate report sent to USAID, but the main conclusions are the following:

- The current legislation on tariff classification generally corresponds to the EU standards, but some small discrepancies need to be addressed.
- The existing Moldova TARIM system is not fully compatible with EU TARIC requirements, mainly in how it is maintained.
- BRITE's work to inventory the permits related to certain tariff positions is absolutely necessary for the TARIC implementation and generally a normal activity for Customs and other regulators.
- Approving the list of trade permits in law, as proposed by BRITE/MCS, is not an ideal solution from an operational point of view. A better solution would be to create a special Inter-Ministerial Commission that will be empowered to review and approve the official tariff positions for all permits, updating as needed for any changes in the legislation or the Harmonized System Nomenclature. This will also encourage greater cooperation, mutual understanding, and information sharing among trade-regulating authorities, which is currently lacking in Moldova.



European expert Vida Mickienė at the MCS headquarters, discussing implementing the EU Integrated Tariff (TARIC) in Moldova

Both MCS and BRITE accept this recommendation as ideal and will try to promote it in the coming month with the MoE, which should take the lead. The MCS could then serve as the Secretariat of such a commission and be supported by BRITE and other donors. The first step will be to finalize the inventory/database of all permits and their classification to serve as the basis for the commission's work.

A2c. Streamline the Export Process

Reduce the number and streamline the issuance of export permits (1.4.1).

The initial inventory of all export permits was completed in Year 2. This will be combined with the import permit database once completed.

Introduce self-certified certificates of origin (1.4.2).

As reported last quarter, MCS has requested support from EUBAM for this effort. BRITE requests COR approval to remove this item from the Year 3 work plan.

Promote and expand the use of electronic export; targeting 55 percent of all export declarations by the end of Year 3 (1.4.3).

The use of electronic declarations for export continues to rise on a monthly basis, reaching nearly 42% of all export declarations in the month of January.

Based on these figures and anecdotal evidence from exporters and associations, some companies are still reluctant to use electronic export or are unsure of its benefits. In fact, most of these include smaller exporters. In order to reach this segment of exporters, BRITE and MCS this quarter developed new outreach material on e-Export and planned several outreach events for the coming quarter. These are discussed in more detail in Component 3.

A2d. Introduce other Electronic Solutions to Streamline Cross-Border Trade

Develop customized software for electronic approval of phyto-sanitary and veterinary-sanitary certificates on import and export (1.5.1).

After the development of a detailed report describing phyto-sanitary and veterinary-sanitary permitting process in the previous quarter, BRITE held several additional meetings with ANSA representatives (January 2015) in order to re-validate our findings and the business-process mapping report. The sessions were successful and the participants provided relevant comments and corrections and validated the report.

The report should serve as the main input document for the elaboration of the Terms of Reference for the implementation of an electronic information system designed to manage the import/export procedures of the agro-goods, starting from issuing the permissive documents and ending with the import/export process itself. According to the concept proposed by BRITE a connection also will be established between the planned ANSA electronic system and MCS's ASYCUDA World, as well as with the systems of other involved public authorities, if appropriate.

BRITE will present the final document to ANSA and other stakeholders this coming quarter, and will discuss with the MoE and the new management of ANSA, in order to agree on the proposed optimized processes that should serve as input information for the Terms of Reference of the information system.

Develop electronic data exchange among the MCS, the STS, and the CRIS Register to eliminate some paper transactions and need for visits to public authorities, and to enhance Risk Management capabilities within the MCS and the STS (1.5.2).

BRITE's ASYCUDA World expert Mr. Popazov traveled to Moldova in March together with an UNCTAD ASYCUDA expert, Constantin Ciuta to complete the review of the existing system, meet with all stakeholders, and gather all the needed information to develop the terms of reference for the data exchange and the ASYCUDA system upgrade. We expect these to be completed in early April, at which time we will develop an implementation plan for approval by USAID. This quarter, the new Prime Minister issued a directive to Customs to complete the data exchange no later than the end of June 2015. We anticipate we will be able to meet this deadline.

Activate additional modules in ASYCUDA to implement EU Simplified Procedures in customs and paperless processing (1.5.3).

As mentioned in activity 1.5.2, our ASYCUDA expert will finalize his assessment of the system and the technical requirements for a system upgrade to implement simplified procedures. We expect to engage this consultant in the second quarter of 2015 to begin this upgrade together with UNCTAD.

A2e. Other Activities to Improve Communications and Increase Transparency

Support the National Customs Consultative Committee (NCCC) (1.6.1).

Because of a lack of issues presented by NCCC members, parliamentary elections in late November, and the slow formation of a new government in early 2015 no meeting of the committee took place this quarter. The next meeting has been scheduled for April 7 and BRITE has worked with all stakeholders to set the agenda and make all the necessary preparations.

Ensure all MCS Internal Orders conform to Moldovan law (1.6.2).

No further work was conducted this quarter.

Develop plain-language guides for economic operators based on reformed customs processes (with Component 3) (1.6.3).

BRITE and MCS completed its first procedure manual for the customs regime of Inward Processing Relief. Based on this, BRITE engaged the same expert to prepare a similar guide for traders. The first draft of this was completed in March and is now being designed for publication. We have also distributed it to several outside parties for comment before finalizing it and posting it on the MCS website.

We also began work on the next customs regime – temporary admission. This too is an important customs regime for certain exporters as it allows them to import goods and means of transport for extended periods of time, without paying duties. The goods are then exported from the country once their use is complete.

A2f. Other Activities

Conduct time-release studies at selected border crossing points (BCPs) (1.7.1).

These were completed in the first quarter and provided to MCS.



Jed Barton and Kent Larson talking to the accountant of Prometeu-T about the benefits of the Current Account platform



Prometeu-T proudly presenting their Authorized Economic Operator certificate

Site visit to Prometeu-T with USAID Mission Director and Moldova Country Director

To illustrate the impact the project's activities are having on individual traders in Moldova, BRITE organized a visit for the USAID Mission Director, Jed Barton, and Country Director, Kent Larson, to one of Moldova's major walnut producers and exporters - Prometeu-T. The company is a beneficiary of a number of facilitation measures including e-Export, simplified procedures/AEO status, and the online Taxpayer Current Account. During the visit USAID was given a tour of the facility and a demonstration of the electronic lodging of an export declaration.

B. Component 2: High-Impact Regulatory Reforms

B1. Project Intermediate Result 2.1: Regulatory framework improved

Improve Moldova's ranking in the annual World Bank *Doing Business* survey.

Protecting Investors (2.1.1).

The new Parliament started reviewing the amendments to the Law on Joint Stock Companies in February 2015. BRITE provided support to the Ministry of Economy and the Parliamentary Committee on Economy, Budget and Finance in promoting the draft amendments. BRITE has also prepared a brief presentation, to be submitted to parliamentarians, which explains the reforms, their necessity and impact and the need for swift approval. In addition, BRITE prepared the questionnaire for the upcoming *Doing Business* Report, which reflects gaps in protecting investors' regulation and demonstrates the need for further reform.

Trading Across Borders and Paying Taxes (2.1.2).

As mentioned earlier, BRITE this quarter held several meetings with ANSA representatives to present our findings on the study of the phyto-sanitary and veterinary-sanitary permitting process. Based on their comments, BRITE developed 1) a set of amendments to laws regulating ANSA functions, and 2) a draft Government Regulation on establishing the OSS for permits issued by ANSA in connection with import-export operations. Pursuant to proposals developed by BRITE, the import/export process is reduced from four stages to one stage. The preliminary

approvals, the inspection of storehouse, and the final certification after importing good in Moldova shall be eliminated. Following the EU approach and according to the regulations proposed by BRITE, the authorization and control of import/export operation shall be performed by ANSA at the border when the beneficiary imports/exports goods. By eliminating these stages, proposed regulations implicitly eliminate ancillary payments, intermediary permits and burdensome procedures.

Dealing with Construction Permits (2.1.3).

With the support of a STTA Consultant Oleg Utica, BRITE finalized a draft of the Government Regulation on establishing the OSS for the issuance of construction permits and additional motivational materials (mapping process, informative notes). Nowadays, applicants are required to perform up to 26 procedures, which require about 290 days. There are three main stages when the applicant interacts with the local authority; before interacting with the local authority the applicant must obtain approvals of up to 8 agencies at each stage. The draft Regulation establishes a single-access-point within local public authorities. The agencies and permits that have a formal role are eliminated. The applicant shall not interact directly with the agencies issuing approvals – all approvals are issued through a specialized information system (software) that manages the whole permitting process at the local authority. The proposed regulations establish a model under which the construction permits shall be issued automatically by the information system if the local authority or agencies do not observe the deadlines or requirements. Pursuant to the Regulation, all public entities are eliminated from the final stage – the reception of construction shall be executed between the beneficiary and executor (constructor) only. Overall, the Regulation would reduce the number of procedures from 26 to 12, and the number of days from 290 to 90. BRITE held a workshop and individual meetings with representatives of the Ministry of Construction, Chisinau Mayorality and construction companies, where we presented the regulatory approach and improvements. The draft Regulation has been submitted with the Ministry of Economy for initial review and further promotion.

B2. Project Intermediate Result 2.2: Administrative burdens and compliance costs for businesses reduced

Reduce the number of permits required for business activity; streamline the issuance of permits (2.2.1).

After consultations with the Ministry of Economy the amendments to the Authorization Law developed by BRITE cover two main sets of provisions: 1) general provisions streamlining the permitting process for all authorizations and 2) provisions streamlining the permits issued by some supervisory agencies, including ANSA. In order to eliminate abusive practices faced by business community, the draft amendments set down additional requirements for the agencies issuing permits. Some of these include: a) The Court of Accounts shall inspect and supervise how public agencies issue permits and authorizations; b) A new permit can be applied after one year after being introduced into the official nomenclature; and c) Public agencies are required to develop and make publicly available guidelines explaining the permitting process. The

amendments passed initial consultation process and shall be reviewed by ministries before the Government approval.

Streamlining the issuance of internal (retail) trade authorization by local public authorities (2.2.2).

After the appointment in February 2015, the new Government decided to call back the amendments on trade authorization from the Parliament and review them again. This is mostly the result of resistance from some central agencies, which refuse to streamline the permitting process by eliminating their controlling and authorizing functions. BRITE shall review again the objections and proposals from the ministries and develop a new table of divergences from the provisions of the draft amendments. As agreed with the Ministry of Economy, the Government shall re-approve the draft amendments quickly and ask the Parliament to adopt them as soon as practicable. Details of these amendments were provided in last quarter's report.

Streamline the voluntary liquidation of the enterprise (2.2.3).

Per BRITE's approved work plan, no activities were planned for this quarter.

Consolidate and streamline business reporting requirements (2.2.4).

As mentioned last quarter, this activity is being led primarily by the Economic Council of the Prime Minister with assistance from IFC. BRITE is a member of the working group but is providing mostly consultation rather than technical assistance. As a result of its work on the single tax payment account BRITE recommended to the working group to consolidate three separate reports into one. These are reports now sent separately to STS, CNAS and CNAM that contain virtually the same information. The Economic Council agreed with the recommendation and is working with these three authorities to agree to a simplification.

Develop policies and procedures for determining fees for mandatory services (2.2.5).

This issue will be addressed later in Year 3.

B3. Project Intermediate Result 2.3: Good regulatory practice institutionalized through capacity building and improved public-private dialogue (PPD)

Strengthen the regulatory impact assessment process (2.3.1).

The ministries are now reviewing the draft amendments to the Regulatory Impact Assessment (RIA) Methodology developed by BRITE over the previous quarter. After revision, the amendments will be submitted to the Government for final approval. During this quarter BRITE drafted initial versions of the RIA Guide and templates for the RIA report, which shall help public agencies in developing qualitative RIA reports.

Our approach and all draft amendments were also shared with the World Bank this quarter, which also has a mandate to assist the MoE to improve the RIA process in the government. The Bank has suggested inviting an international expert to comment on the process and BRITE's recommendations, which we indicated we would support.

BRITE also organized a mentoring course in March for regulatory drafters within the Customs Service. Part of this exercise is to test the use of the RIA Guide, and tailor it for use within Customs to build their capacity for future RIAs. This will help identify any gaps or weaknesses in the RIA Guide and templates and help finalize a standard approach for use more broadly within the Government. The final versions, however, will be developed only after the Government approves proposed amendments to the RIA Methodology.

B4. Project Intermediate Result 2.4: Transparency and access of entrepreneurs to business regulation increased

Implement the State Local Act Registry (2.4.1).

After the formation of the Government in February, the State Chancellery finally restarted its activities related to creating the State Local Acts Registry. BRITE met with the new management of the State Chancellery and new working group has been formed to finalize the necessary work. The ministries and some local authorities have provided their additional proposals to draft regulations, and BRITE is now preparing the comparison tables to present to the MoE. There are no fundamental objections to the proposals and we expect the legal approvals in the coming quarter and to begin implementing the technical solution shortly thereafter.

Build capacity of both private and public sectors to provide information that will facilitate entrepreneurship (2.4.2).

No activities this quarter. This work depends on the approval of BRITE supported reforms discussed above. Plans include practical guidelines explaining to companies how to accomplish a business operation (e.g. obtaining permits for internal trade, construction, etc. Similar work is being done in the trade area for import/export operations and key customs regimes (see Component 1).

C. Component 3: Strategic Communications

C1. Project Intermediate Result 3.1: Increase awareness and understanding of business climate reform, progress achieved to date, and new reform initiatives

Improve GOM counterparts' communications through capacity building and targeted support (3.1.1).

Moldova State Tax Service

- a) Providing technical, logistical and financial support to the STS informational campaign regarding the change of the deadline for filing taxes to March 25th

Based on a Governmental Decision from December 2014, the deadline for tax filing was changed to March 25th from March 31st. Given the tax payers' familiarity with the previous deadline, there was an obvious need for an informational campaign so that the taxpayers plan accordingly and avoid being fined. BRITE agreed to support Moldova State Tax Service (STS) in the preparation of the campaign with the purpose of building the capacity of the authority's communication team, but also of all other involved staff, in planning a campaign and developing a range of media products.

Accordingly, BRITE contracted a qualified Moldovan firm to produce in cooperation with STS the message of the campaign and a graphic video spot about the deadline change.

The graphic video spots and the related audio spot have been broadcast on local TV (7 channels), radio (8 stations), in commercial centers (including the central market), 80 trolleybuses and 20 buses, social media, etc.

The firm also designed posters and banners to be placed in public places like post offices, city halls, and streets. BRITE sponsored the printing of the posters as well. Over 4000 posters were distributed and 25 street banners placed across the country.

The respective design was also adapted into images for social media and web banners for various local websites.

Throughout the implementation of the campaign, BRITE also supported STS with project management assistance and consistent feedback. Following discussion with BRITE, STS also spread the message (independently) through TV appearances of its main representatives (Ion Prisacaru, Veronica Vragleva), via regular social media posts and a master class/press club for journalists.

Based on this capacity-building exercise, BRITE also provided several key recommendations to STS: (1) establish a definitive working group at the beginning of the process to avoid countless revisions as more people come in at different stages with new input that occasionally contradicts the input of a different STS representative, (2) empowering the Communications team with more decision-making authority to streamline time-sensitive matters and to reject unessential input and requests for modifications, (3) taking on a more cooperative rather than authoritative approach when addressing and collaborating with the contractors (i.e. graphic design companies).

b) Facilitating the revision of the STS Brand Book

STS identified the need for certain revisions to its brand book due to some omissions on the part of the authority, the consulting Heraldist, as well as of the design company. Specifically, new



Preview of the campaign's banner



The campaign's poster placed in the downtown of the city of Soroca

heraldic regulations had been implemented since the approval of the brand book in May 2014 necessitating further modifications, which BRITE’s designer completed. The brand book is set to be finalized in April 2015, and will be incorporated into the training curriculum developed with BRITE support last year.

- c) Supporting STS and SIDA experts in researching the possibility of developing a new STS website.

The BRITE team met with Swedish Tax Agency expert Ylva Vesterlund in February to discuss options for improving the STS website. The website does not have complete and clear information for the taxpayers, with its content in Russian falling behind, in particular. A well-built website would also cut down on the demands of a call center and cater to the information needs of the taxpayers. Most importantly, STS has no control over its current website: the authority must go through the independent state-owned institution FiscServInform to make any changes or posts to its website. FiscServInform also charges STS for any requests and is reportedly uncooperative in this regard.

While SIDA is willing to provide web support, BRITE advised them that all web sites of state agencies are to be consistent with structures and policies determined by the State Center for Special Telecommunications and that in some cases, this institution can provide the platform and design for a new web site. BRITE led the preliminary discussions and connected the two institutions. Mainly, BRITE communicated to the STS and the STA that the primary task is to evaluate whether STS has the capacity and the management muscle to undertake such a large project and to assure its continuity.

A meeting with the experts and information architects from the Swedish Tax Agency is planned for mid-April to discuss the conclusions of the respective STA mission. At this stage, BRITE does not anticipate taking on the project of rebuilding the STS website provided BRITE’s knowledge of the existing organizational impediments within STS.

Moldova Customs Service

- a) Developing promotional materials to reach exporters not yet using the e-export platform

Provided that 60% of all export declarations are still filed in paper form, BRITE has been discussing with MCS various initiatives to bring the message on electronic declaration to relevant exporters.

For this purpose, BRITE contracted a qualified Moldovan firm to produce in cooperation with the MCS two informational flyers that assemble, with a few updates and adjustments, the existing infographics on e-export (now available online on the Customs website <http://customs.gov.md/ecustoms/>). Notably, the flyers also clarify that an exporter can use the e-export platform either on their own, or with the support of their customs broker,



Preview of “Stages of Electronic Export” flyer

addressing the concern that some brokers may not be offering e-export to their clients. The flyers are to be mailed to the exporters in question as well as distributed at relevant events.

Moreover, the infographics available on the website will to be modified based on the adjustments reflected in the flyers.

b) Improving the e-export platform

BRITE offered to support MCS in organizing a focus group of the most active exporters to identify what improvements could be made to the platform. The initiative is on hold and under consideration.

c) Launching communications efforts on e-Import

Starting with March 1, the e-Import procedure is applicable at all customs points across the country. In parallel, BRITE and MCS have been planning a series of events across the country with brokers as well as major importers to introduce the new regime. The relevant presentation materials have already been developed and the participants identified. The events should begin in April.

Based on the feedback received at the respective events, the promotional materials on e-import will be finalized.

d) Developing the logo of the MCS' Authorized Economic Operator (AEO) program

The introduction of an Authorized Economic Operator (AEO) program in Moldova is part of the MCS' efforts of reform and modernization of its working practices. Via the program, companies that have a record of compliance and reliable internal compliance systems can be granted AEO status and, as a result, can obtain the benefit of voluntary compliance and simplified clearance procedures. MCS would like to develop a unique logo to be used by all qualified AEOs, both as an official designation of that status and a promotional tool. BRITE contracted a qualified Moldovan firm to produce (together with the MCS) several logo concepts to be reviewed by MCS and BRITE. A final design should be approved in April.

e) Organizing communications trainings for MCS staff

As a result of the positive feedback of the media training for STS employees, BRITE carried out discussions with MCS as to their communication needs and subsequently contracted communications expert Ludmila Andronic to deliver similar (but customized) trainings for the MCS. A total of nine trainings are to be conducted during April-May 2015. The set of trainings targets the communication team and various levels of management (i.e. chiefs, subdivision chiefs) at the headquarters and regional offices and also includes a training-of-trainers component.

The project is in the phase of assessing the exact needs of the various MCS target groups for the trainings, elaborating the training materials and logistical planning.

f) Producing Customs Guides for Traders

Based on the Customs internal procedures guide on Inward Processing developed last quarter, BRITE's STTA Eduard Cunicica produced a similar, yet streamlined guide for economic operators that explains the process, its benefits and how to apply for and use its features. The guide is now being formatted and will be reviewed by several outside parties before being

finalized early next quarter. The final version will be posted on the new Customs web site and, possibly, provided in printed form.

g) Supporting development of the new MCS website

The MCS new website is set to go live in two languages during the second week of April. The authority has already incorporated the comments of BRITE and Strategic Communications Advisor Lisa Gihring provided earlier, which improve the usefulness of the site and its information. This quarter, BRITE completed the translation for the English version of the website and provided this to MCS to upload.

Increase accountability of government by civil society and the media (3.1.2).

a) Finalizing the Business Media Development Program (BMDP) of 2014

Phase 1 of the BMDP concluded in January 2014 with the selection of the best media products in each of the main categories – editorials, articles, TV shows and infographics. During the course of the BMDP, participating journalists produced over 40 analytical materials, editorials and talk shows. Out of these, an independent jury appointed by AmCham Moldova and BDR recognized the following journalists and media outlets for excellence:

First-level diploma/prize

- Victoria Dumbrava (Agora)
- Mariana Tabuncic (InfoTag)
- Alexei Lungu (Publika TV, Banii Tai)

Second-level diploma/prize

- Alexandr Tanas (InfoTag)

Third-level diploma/prize

- Dmitri Kalak (Ekonomicesckoye obozrenie Logos-Press)
- Mariana Salamac (ECOMagazinet)

Consolation diploma/prize

- Ion Chislea (Economist)

Special prize for infographics

- Agora (Head Editor Victoria Dumbrava)

Photos from the BMDP Award Ceremony, January 2015



b) Developing the next phase of a Business Media Program 2015

During February 2015, with the help of strategic communications advisor Lisa Gihring, the BRITE team held discussions and consultations with partners from business networks, media companies and PR specialists to develop the concept for the next phase of the Business Media Program. The conclusion reached was that BRITE should establish its own relationship with the media companies and their journalists and select topics that could be investigated in depth and over time. Preliminary discussions with companies/journalists who participated in the first phase indicated a strong interest in continuing this effort. BRITE finalized a concept and issued a call for expressions of interest from qualified media companies. Each was required to nominate and dedicate at least one journalist to work with BRITE for the duration of the program (initially six months with an option to extend six months). By the deadline in March we received seven EOIs and after review we have pre-qualified four media companies based on their proposals, nominated journalists, and their ability to reach BRITE’s target audiences. Each will now prepare requests for proposals that will include cost proposals; based on these, a final selection will be made by the end of April and the program will launch the first week of May.

Develop and implement communications strategies for major BRITE-supported reforms (3.1.3).

BRITE and MCS continue their efforts of increasing the use of the e-export platform via strategic communication, by developing informational flyers to be mailed or distributed at relevant events (as described above) and researching other options of getting the message to the businesses that do not file the export declaration electronically. In addition, BRITE seeks to support MCS in improving and producing the voice-over for its ASYCUDA tutorial video; at

this point, MCS seeks to obtain more feedback on the existing video during any upcoming relevant events for exporters or focus group meetings.

In parallel, BRITE and MCS have started planning events on e-import across the country. Various formats of conducting the events have been discussed and the events are to take place regionally and target both importers and brokers. Following the events, BRITE will seek to develop a more detailed communication strategy and action plan on e-import.

Develop “how-to” guides on BRITE-supported reforms for publication relevant website and dissemination to targeted audiences (3.1.4).

The first guide on inward processing was finalized this quarter and is now undergoing final edits and design. It should be ready for distribution and publishing in mid-April. The second guide on temporary admission is now being developed.

Project communications (3.1.5).

Website and Facebook

BRITE’s website is being updated with the latest events and stories, while the Facebook page includes statuses about the project and our partners’ current issues.

The Facebook page has reached over 820 likes, recording increased engagement since the beginning of February. Top posts for 2015 are listed below.



Published	Post	Type	Targeting	Reach	Engagement
03/18/2015 5:02 pm	 REQUEST FOR EXPRESSIONS OF INTEREST for Moldovan Media Companies http://brite.md			1.2K 	6% 
02/04/2015 9:54 am	 Programul de dezvoltare a presei cu profil economic - proiect susținut de USAID BRITE - a			1.1K 	14% 
02/04/2015 11:57 am	 În calitate de secretar al Consiliului consultativ pe lângă Serviciul Vamal al Republicii Moldova și de			376 	15% 
02/05/2015 10:07 am	 REQUEST FOR QUOTATIONS (RFQ): Elaborating a Logo for the AEO Program of the Moldovan			347 	3% 
03/24/2015 3:05 pm	 Primarii localităților din raionul Ungheni susțin recomandările BRITE cu referință la optimizarea			189 	7% 
03/25/2015 12:10 pm	 Expertul european Vida Mickienė livrează săptămâna aceasta o serie de ateliere de lucru la			186 	17% 
02/23/2015 3:39 pm	 În perioada 18-19 februarie 2015, programul BRITE a organizat un curs de instruire pe tema utilizării			134 	16% 
02/11/2015 11:53 am	 USAID Business Regulatory, Investment, and Trade Environment Program shared E-Government			133 	2% 
03/10/2015 12:14 pm	 USAID BRITE a contribuit la dezvoltarea recomandărilor cu privire la politici și reforme			120 	11% 

The USAID BRITE Facebook posts with the highest reach in 2015

SECTION II: OPERATIONS AND ADMINISTRATION

Communications specialist Anastasia Taburceanu resigned from the project in January 2014. As a result, the project hired a new strategic communications specialist Ruxanda Nedelciuc to lead the component while strategic communications advisor Olesea Galusca is on maternity leave. Lisa Gihring continues to provide guidance and technical assistance to the component and spent two weeks in Chisinau to train the new communications specialist, as well as to help research and draft the concept of the BRITE Business Media Program among other activities. As part of this concept, Olesea Galusca will return to BRITE on a part-time basis to serve as media coordinator the Business Media Program.

SECTION III: PREVIEW OF UPCOMING QUARTER

BRITE is planning the following activities/events in the coming quarter, among others:

Component 1: Tax Administration

- Official launch of the new enhancements to the Taxpayer Current Account

Component 1: Trade Facilitation

- Conduct next meeting of the Consultative Committee
- Organize and conduct the CEFTA Deputy Ministerial Meeting in June
- Start development of data exchange with Customs, STS and CRIS Regstru; ASYCUDA upgrade with UNCTAD
- Launch Blue Lane processing
- Support first meeting of inter-agency committee on non-tariff trade regulations

Component 2: Other High-Impact Reform Activities

- Work with the deputies and Parliamentary committees to advocate amendments to the Joint Stock Companies Law in the Parliament;
- Work with the Government to re-approve the draft amendments and work with deputies and Parliamentary committees to advocate amendments related to internal trade authorizations;
- Work with the State Chancellery and Government, and tentatively with the Parliamentary committees to promote amendments related to the Registry on Local Acts;
- Provide assistance to MoE in promoting regulations and amendments:
 - establishing the OSS for permits issued by ANSA in connection with import-export operations
 - establishing the OSS for the issuance of construction permits;
 - streamlining the permitting process for all types of authorizations and permits;
 - streamlining the RIA methodology.

Component 3: Strategic Communications

- Contract media companies and launching the BRITE Business Media Program 2015-2016
- Develop the informational campaign on e-import
- Continue the communications efforts for increasing the number of export declaration filed electronically
- Launch the MCS communications training
- Distribute trade guide on Inward Processing
- Introduce the AEO logo
- Launch an additional informational campaign on the Current Account regarding its new functionalities

SECTION IV: MONITORING AND EVALUATION

Progress toward PMEP Targets

During the second quarter of FY2015 (Y3 of BRITE program), all PMEP indicators were subject to revision and verification, based on raw data. This activity is in line with the periodical

validation of the results reflected in the PMEP. As a result, some indicators were reevaluated, including for FY2013 and FY2014. Two reforms implemented in FY2015 Q1, are reflected in this quarterly PMEP update: Implementation of AEO concept and the deferred determination of customs value, both related to Trade.

Indicators 2 and 3, which represent the monetary benefits produced to public and private sectors, through reforms implemented with BRITE assistance reached a total of USD \$68.3 million for private sectors and USD \$5.4 million for the public sector. Our projections show that the life-of-project monetary benefits for private sector will be greater than the target of USD \$100,000 million. The values for these indicators increased due to evaluating the impact of some reforms implemented earlier, but for which the impact was difficult or impossible to estimate until recently, as the data were not available.

The number of training hours in FY2014 was over estimated, the actual number is 1,276 man-hours. In the first half of FY2015, the number of training hours was 1,898.

The Moldovan Exports and Trade Diversification Index value is going down, as the exports of Moldova do. Currently, based on 2014 data, the value is 2.83, but could worsen, due to economic crisis, Russian embargoes and the crisis in Ukraine.

An inventory of the media stories was made and only those which back-ups were available or for which a back-up could be created, including radio, Internet and TV media stories, were preserved in the Media Monitoring Register. Also, the figures in this quarterly PMEP report show exactly in which FY, the media story was published.

Progress registered in FY2015 Q2 represents two new media stories about BRITE activities, 47.2% women participated in activities organized with BRITE support (the total for the first two quarters – 50.2%), 264 man-hours of training, two activities organized by BRITE involving PPD mechanism. No new reforms were enacted or fully implemented.

There is some progress in implementing electronic import declarations; however, they have represented only 0.5% of total import declarations in March 2015. We expect a similar dynamic as for the electronic exports, so that a considerable impact could be measured after another 6 months. The share of e-export declarations increased to about 45% of total monthly volumes.

ANNEX A: PROGRESS TOWARD THE PERFORMANCE MONITORING AND EVALUATION PLAN

Nr.	Indicator	Unit	Results				Targets		
			FY 2013	FY 2014	FY2015 Q2	Life of project	FY 2015	FY 2016	Life of project
BRITE Program Objective: Identify and Implement Business Environment Reforms Through Increased Public Private Dialogue and Improved Institutional Capacity									
1	Percent improvement in raw values of the indicators underlying BRITE-related areas of the World Bank Doing Business rankings	%	4.4	13.5	0	18.5	4	3.7	20
2	Monetized benefit of BRITE-sponsored reforms to the private sector	ml. USD	4.65	48.48	15.19	68.32	35**	42.15**	100
3	Monetized benefit of BRITE-sponsored reforms to the public sector	ml. USD	0.84	3.60	1.00	5.44	46**	50.31**	100
4	Number of activities and initiatives, supported by BRITE, and involving the participation of businesses in PPD	area	12	19	2	33	15	15	55
5	Percent of private sector representatives that consider having benefited from reforms implemented with BRITE assistance	%	47.4	62.5	0	62.5	60	70	70
6	Number of regulations and administrative procedures eliminated, streamlined or simplified with BRITE support	#	12	13	2	27	16	16	55
7	Person hours of training provided by USG	#	1,538	1,276	1,898	4712	1000	700	5536
8	Proportion of female participants in BRITE-assisted activities, initiatives and events	%	55.8	48.8	53.4	53	45	45	45
Component 1 – Taxes and Trade									
IR 1.1 – Improved tax administration reduces the administrative burden of paying taxes while increasing revenue collection									
9	Number of hours required to pay taxes each year	#	181	185		185	176	165	165
10	Number of tax payments businesses must pay each year	#	31	21		21	20	10	10
11	Private Sector perception index score for paying taxes	1 (very difficult) - 5 (very easy)	3.97	3.79	3.73	3.73	4.2	4.3	4.3
12a	Time to export	Days	32	23		23	20	18	18
12b	Time to import	Days	35	27		27	24	20	20
13a	Number of documents required to export goods across borders	#	7	9		9	6	5	5
13b	Number of documents required to import goods across borders	#	8	11		11	6	5	5
14	Moldovan Exports and Trade diversification index	1 (very low) - 5 (very high level)	3.07	3.02	2.83	2.83	3.25	3.4	3.4
Component 2 – Other High Impact Reforms									
IR 2.3. Institutionalize good regulatory practice through capacity building and improved public-private dialogue (PPD).									
15	Percent of RIAs approved by the National Working Group from the first reading	%	22	29		29	40	50	50
Component 3 – Strategic Communications									
IR 3.1. Increased awareness and understanding of business climate reform, progress achieved to date, and new reform initiatives.									
16	Percent of private sector representatives that are aware about the reforms implemented with BRITE assistance	%	0.4	11.1	9.2	9.2	25	40	40
17	Number of articles in print media, as well as TV and radio segments, devoted to the specific reforms and project initiatives to improve the business enabling environment	#	31	83	22	136	50	52	200
18	Percent of private sector representatives that respond positively regarding the speed and transparency in the activity of public institutions receiving BRITE assistance.	%	30.2	53.3	50.2	50.2	50	60	60