Project Fiche No. 8 Implementation and follow-up of the Small Business Act (SBA)

1. Basic information

1.1 CRIS Number: 2010/022-029

1.2 Title: Implementation and follow-up of the Small

Business Act (SBA) in the pre-accession region

1.3 ELARG Statistical code: 02.20 – Enterprise and industrial policy

1.4 Location / Beneficiaries: Western Balkans: Albania, Bosnia and

Herzegovina, Croatia, the former Yugoslav Republic of Macedonia, Montenegro, Serbia as

well as Kosovo under UNSCR 1244/99

Turkey

Implementing arrangements:

1.5 Contracting Authority (EU): European Union represented by the European

Commission on behalf of the Beneficiaries

1.6 Implementing Agency: Not applicable

1.7 Beneficiary: Relevant Ministries and SME Agencies in

respective country

Financing:

1.8 Overall cost (VAT excluded)¹: EUR 340 000 1.9 EU contribution: EUR 300 000

1.10 Final date for contracting: 30 November 2011
1.11 Final date for execution of contracts: 30 November 2013
1.12 Final date for disbursements: 30 November 2014

2. Overall Objective and Project Purpose

2.1 Overall Objective:

The overall objective of this project is to improve the business environment in general and for SMEs in particular, set against the Copenhagen economic criteria.

2.2 Project purpose:

The purpose of this project is to support the Western Balkans and Turkey to implement the Small Business Act, especially by improving the overall policy approach to entrepreneurship, by irreversibly anchoring the "Think Small First" principle in policymaking from regulation to public service, and by promoting SMEs' growth.

¹ The total cost of the project should be net of VAT and/or other taxes. Should this not be the case, the amount of VAT and the reasons why it should be considered eligible should be clearly indicated

This purpose will be achieved through comprehensive and comparative assessment of the implementation of the Small Business Act, continuing in this way the process that was previously in place for the European Charter for Small Enterprises.

2.3 Link with AP/NPAA / EP/ SAA

The Accession and European Partnerships include, as objective, to achieve progress in the implementation of the European Charter for Small Enterprises. As the Charter is currently replaced by the SBA, this objective will likewise be modified, in the new version of the Partnerships to reflect the new *aquis communautaire*. This project will further reinforce the Stabilisation and Association Process, as it will continue the good political and economic cooperation in the pre-accession region which was established under the previous process to implement the European Charter for Small Enterprises.

2.4 Link with MIPD

The implementation of the Small Business Act should help the countries develop a stable business environment for SMEs and would contribute, through the follow-up of the different principles of the SBA, to the enhancement of the SME competitiveness and the strengthening of their technological capacity. This is in conformity with the identified priorities under the Multi-beneficiary MIPD 2009-2011 (Section 2.3.2.1) related to the competitiveness of the pre-accession economies.

2.5 Link with National Development Plan

The National Development Plans include, among their strategic priorities, the improvement of the business environment, aiming at a more attractive environment both for entrepreneurs from inside the country as well as for the foreign ones. This also represents a key criterion for achieving a functioning market economy. In this process the countries were guided by the European Charter for Small Enterprises, which is now replaced by the Small Business Act.

3. Description of project

3.1 Background and justification:

This project is the first one in this field covered by IPA multi-beneficiary and it is a continuation of the process launched in the 2003 EU-Western Balkans Summit in Thessaloniki, Greece, where (at that time) the Western Balkans (Albania, Bosnia and Herzegovina, Croatia, the former Yugoslav Republic of Macedonia, Serbia and Montenegro including Kosovo under UNSCR 1244) adopted the European Charter for Small Enterprises. The Charter is a pan-European policy document, adopted in the framework of the Lisbon Agenda to improve co-operation on enterprise policy issues within the EU and between EU Member States.

The 2003 Thessaloniki Agenda for the Western Balkans provided a three-year mandate for the European Commission to monitor and support implementation of the Charter in the region. The Charter monitoring process resulted in the publication of three sets of national reports (2004, 2005 and 2006).

In 2006, the Charter reporting in the EU was integrated in the reporting under the new Lisbon Strategy for Growth and Jobs for the 25 EU Member States. Bulgaria and Romania also joined the Lisbon Strategy. Faced with the possibility of a discontinuation of the Charter reporting in the Western Balkans, the six countries including Kosovo under UNSCR 1244 adopted the Belgrade Declaration at a regional meeting in Belgrade, Serbia, on 26 October 2005. It called on the Commission to continue the Charter process in the region. As a policy response to the Belgrade Declaration, the Commission expressed its readiness to continue the process for another three years (2006-08).

A first regional report on the Charter implementation in the Western Balkans, using a new instrument, the SME policy index, and benefiting of the cooperation of three partner organisation (OECD, EBRD and the European Training Foundation (ETF)) alongside EC, was published in March 2007. In May 2008, a second assessment, based on the same methodology as in 2006, was launched. It was finalised with the publication of the 2009 Report on the progress in the implementation of the European Charter Process.

Turkey endorsed the Charter in 2002 and the first implementation progress report covering Bulgaria, Romania and Turkey was published in 2003. The last reporting for Turkey took place in 2005. Since the reporting for the European Charter for Small Enterprises was included in the Lisbon reporting, Turkey was left out. This was because Turkey could neither be part of the Western Balkans Charter process (the process was based on the 'Belgrade Declaration' signed only by the Western Balkans partners), nor part of the EUROMED Charter. The Turkish authorities expressed their interest in the previous process and therefore, the current project fiche is including Turkey for a number of activities.

At the end of 2008, whilst the Belgrade Declaration expired, based on which the Charter process was carried out, the Small Business Act, the new policy framework in SME policy was endorsed by the European Council. These two events brought the Charter process of 2006-2008 to an end.

The Western Balkan governments and the partner organisations expressed strong interest in adopting the Small Business Act as a guidance tool for SME policy, replacing the European Charter for Small Enterprises. They called for a continuation of the regional SME policy measurement and implementation process in the **High-level Conference on the implementation of the European Charter for Small Enterprises in the Western Balkans which took place 17 - 18 June 2009, in Brussels.** The National Charter Coordinators emphasized the importance of the guidance process (previously through the Charter's action lines, now through the SBA principles), monitoring (through the SME Policy Index and the different bilateral and regional meetings of the countries with the EU and the partner organisations), and evaluation (through the final report) led by the partner organisations. Furthermore, the comparability of their performance across countries and across time helped motivate the public administration to improve the business environment and provided a good opportunity to learn from each other and from the Member States.

The current project is a reply to this request.

The main outcomes of this process will be:

1 Improved business environment and enhanced functioning market economy through the implementation of the principles of the Small Business Act;

- 2 Stronger cooperation in the region through sharing experiences and mutual learning, based on the benchmarking exercise and the dissemination of good practices, and enhanced competitiveness, in particular for SMEs. It is envisaged to set up a strong synergy among the beneficiaries, the OECD and the Member States, especially with those which already established cooperation links with the beneficiaries in the SME sector
- 3 Better implementation of the aquis communautaire of Chapter 20 (Enterprise and Industrial Policy);

3.2 Assessment of project impact, catalytic effect, sustainability and cross border impact

This project will have a positive impact on the business environment in each of the partners, as it will motivate the governments to continue their reforms and the reporting and monitoring system will provide clear yardsticks to the government to set out the next steps of the reform process. The direct beneficiaries of the project are the respective Ministries of Economy, or similar, and the SME Agency in each of the countries.

One of the main ideas promoted through this process is the strong coordination between the public administration and the private sector. Due to the past process the public-private dialogue improved and the future project should deepen this effect.

Also, due to the fact that the SME policy includes measures of different types under the responsibility of different ministries such as: taxation, education, innovation, availability of skills, the process has a catalytic effect for reforms in those areas as well, and not only on those under the responsibility of the Ministry of Economy.

Furthermore, the process brings together for discussion representatives from each of the partners in the region, enforcing the cooperation between them and the mutual learning process. A good example in this respect, which started from the previous process, is the creation of the South-East European Centre for Entrepreneurial Learning. The centre is also a good example for the transfer of ownership of this process towards local or regional institutions in the region. Under the current process, it is envisaged to achieve a transfer of ownership towards the business associations in order to collect data and process the survey in their respective countries. Another measure in the same direction will be the establishment of commitment by the government on three areas and the follow-up with a specific regular monitoring system.

3.3 Results and measurable indicators:

The project will have several activities and at the end of each of them the following results will be achieved:

1. **New monitoring tool.** For the first activity the result will be a new SME policy index (i.e. a set of precise measurement indicators) that will be used in the next phases. This SME policy index will be divided in 10 chapters according to the principles of the Small Business Act. As there is a link between the two key policy documents, the new SME policy index will help assess both the new elements of the SBA, while making possible the comparability of assessments with the Charter under certain principles. At the end of this activity the new

- SME policy index would have been endorsed by the partners in the region and the partner organisations.
- 2. **Assessment process.** The result of the second activity will be having all the necessary information on the inception and the implementation of the SME policy by the public administration, based on the SME policy assessment instrument, through a self-assessment, an independent assessment and the bilateral meeting, in each of the partners in the region during which policy stakeholders can express opinion on the government's policy. These assessments will be exchanged between the government, the independent assessor and partner organisations, after they will be completed. These results represent the basis for the report on the progress achieved under the SME policy.
- 3. **Enterprise survey.** A first result of this activity is the questionnaire elaborated by the partner organisations under the coordination of DG ENTR. At the end of the third phase of this project, the results of the company surveys, case studies and the focus groups will be available. They will be used in connection with the assessments to evaluate the implementation of the different principles of the Small Business Act. With this questionnaire the governments will have an assessment of the business community on the measures they have been taking, this being a powerful documentation instrument.
- 4. **Bilateral meetings.** In the bilateral meetings in each country, the governments will receive a preliminary assessment of their performance from the independent assessors, the results of the company survey and focus groups. They will also obtain an initial assessment from the partner organisations on the next steps to be taken in the SME policy. For the partner organisations, as the meeting offers a good opportunity to clarify the aspects on which the two assessment reports and the survey diverge, the result will be the full understanding of the sate of play in the SME policy.
- 5. **Regional report**. The result of the fifth activity is the 2011 Regional report on the Implementation of the SBA.
- 6. **Dissemination.** A regional conference will be organised to launch the report and to get visibility for the results of the process.
- 7. **Monitoring and assistance.** The outcome of this activity will be a good understanding of the EU acquis in those respective fields, the good practices of the Member States and the views of the business community on them. This would lead to substantial progress in those areas over the duration of the project.

3.4 Activities:

The Project will be structured in seven activities, comprising the activities listed below:

Activity 1 – Elaboration of a new set of indicators and monitoring tools, combining elements of the Charter and the SBA.

At the meeting following the launch of the SME Policy Index 2009 Report, held in Brussels on 17 and 18 of June 2009, the National Charter Co-ordinators, the European Commission, and the partner organisations (OECD, ETF, and EBRD) agreed to continue the regional process of assessment of SME policy. It was also agreed that the new cycle of monitoring and evaluation will be using an evaluation framework that will combine elements from the European Charter for Small Enterprises as well as from the Small Business Act. In this way it will be possible to benchmark SME Policy in the region against the latest EU policy instrument and, at the same time, to maintain comparability to past evaluations (SME Policy Index 2007 and 2009).

The European Commission, the partner organisations, and the National Charter Co-ordinators, plan to conduct preliminary work on refining the existing indicators and integrating elements from the SBA into the assessment framework between October 2009 and March 2010. In order to validate these indicators, consultation with experts from the region as well as from EU and the partner organisations will be conducted and a meeting will be held in order to endorse the new assessment framework by all the parties involved in the process.

Activity 2 – Cross country policy evaluation based of the new set of policy indicators and monitoring tools.

Activity 2 will start with the assessment of the current status of entrepreneurship and enterprise development policies in the region based on the new assessment framework. The work will be co-ordinated by the DG ENTR in consultation with the OECD, the ETF and the EBRD and with the support of a team of local and international consultants. The governments and administrations of the region (Ministry of Economy and SME Development Agencies) will, in parallel, conduct a self-assessment exercise, also based on the same assessment framework. The outcomes of the two assessments will be made available to the two groups before each bilateral meeting in the region. They will be analysed with the Charter National Co-ordinators at the bilateral meetings in each country and Kosovo under UNSCR 1244. The results of this process will be presented and discussed in a regional meeting were all the partners will be present.

To the extent that the results of the SME Performance Reviews conducted for the preaccession countries which are participating in the Entrepreneurship and Innovation Programme (EIP) will be significant, they will be integrated into the regional assessment. As Bosnia and Herzegovina and Kosovo under UNSCR 1244/99 are not part of the EIP, additional work will be carried out to gather data and information along the lines of the SME Performance Review for them with the support of international and local experts.

Furthermore, considering that Turkey will be new to the process, additional work will be required in order to introduce the assessment methodology to the Turkish administration, to gather background information on the SME sector and SME policy developments in the country, and to engage SME stakeholder into the process.

Activity 3 – Organisation of company surveys and/or focus groups in all the beneficiary countries and integration of results of company surveys/focus groups into the evaluation exercise.

At the meeting in Brussels on 17 and 18 June 2009 it was also agreed to include an additional element of analysis to the assessment framework by systematically gathering the views of the private sector in order to obtain a better insight about the implementation status and the impact of SME policy measures. This will be done by focus group meetings and company surveys conducted with the support of local private sector organisations, such as chambers of commerce and/or SME associations. The questionnaire for the company survey and the question lists for the focus group will be elaborated by the partner organisations under the coordination of DG ENTR. The result of the company surveys will complement the information collected through the assessment described in Activity 1 and 2 and will contribute to formulating a more precise assessment of the status of SME policy implementation. The focus groups will be used to both find out in more depth what the present situation is in three priority areas selected by the government together with the partner organisations based on the 2009 Report on the progress in the implementation of the Charter, the governments priorities and the survey's results. They will also give some insights on what the entrepreneurs considers being the best measures in order to improve the situation in those particular areas. Due to the limited budget available and the size of the Turkish SME sector, this activity will not cover Turkey.

Activity 4 – Consultation with the governments and stakeholder in the region

Once the government self-assessment, the independent assessments, and the focus group meetings and company surveys have been completed, the governments of the region will organise consultative bilateral meetings, involving relevant ministries government organisations and representatives of the SME policy community, including chambers of commerce, entrepreneur associations, financial institutions, NGOs and economic research centres. The purpose of the consultative bilateral meetings, jointly chaired by the government institution acting as the SBA National Co-ordinator and the EU, is to present and discuss the preliminary results of the combined assessments and to identify policy priorities and actions. On average, some 40-60 stakeholders take part in these meetings, which are opened by the relevant Minister and the EU representatives and EU Delegation in the country and chaired by the SBA Co-ordinator. These meetings usually gain considerable coverage in the press.

Activity 5 - Elaboration and publication of the Regional Progress report

At the conclusion of Activity 4, the OECD and the partner organisations will draft the 2011 regional report. The EU will co-ordinate the drafting process and OECD will be in charge of the final editing, lay out, printing, and publishing of the report.

Activity 6 - Dissemination and presentation of the Regional Progress Report

The regional report will be launched at a conference bringing together senior policy makers form the region, representatives from private sector organisations and other stakeholders and representatives from the EU and the partner organisations. Country-presentations will also be conducted in order to stimulate debate and public-private dialogue on SME policy issues at country-level in the region. Paper and electronic copies of the report will be widely disseminated in the region by the OECD and the partner organisations. The report will also be made available through links on the EU and partner organisations' websites.

Activity 7 – Monitoring of priority action implementation and support in policy implementation

The countries of the region will be asked to choose three priority areas, based on the outcomes of the 2009 Report, the government policy and priorities set under SBA and make specific commitments for their implementation. In their endeavour, countries will be helped by the partner organisations. The EU and the partner organisations will provide policy guidance through the identification and exchange of good practices. The company surveys, focus groups and case studies will be used in order to identify the week points in those areas and to seek solutions for improvement. The EU will be in charge of the co-ordination of these activities and the organisation of the regional forums. Following the publication of the regional report, a system of regular monitoring of the commitments will be established, in agreement with the governments of the region and in line with the practices of the SBA on the same three areas, or if substantial progress was already achieved in new ones. In the respective fields coordination with the existing IPA national programmes will be envisaged. Due to the fact that Turkey was not part of the Charter process in the last four years, this activity will be significantly scaled down for Turkey.

3.5 Conditionality and sequencing:

The main conditionality for the success of this project is the commitment of each of the governments in the region to continue this process and to allocate the necessary human resources to continue our cooperation. They expressed their commitment in the High-level Conference on the implementation of the European Charter for Small Enterprises in the Western Balkans which took place 17 - 18 June 2009, in Brussels.

The sequencing of the activities is shown in the Annex III. Project Schedule diagram.

3.6 Linked activities

The current project is the first one of this type to be financed under IPA multi-beneficiary programme. The results of this process will help enhancing the results of other projects aiming to improve certain areas of the business environment. The current project will interact with other projects financed by IPA such as: the Regional Competitiveness Initiative, the Investment Reform Index and the financing of activities of the South-East European Centre for Entrepreneurial Learning. The results of many other projects under the crisis-response package will be reflected in the assessment under this project. The same is true for the different national IPA projects which aim at supporting SMEs' growth and provide technical assistance to the public administration on certain aspects of SME policy.

3.7 Lessons learned

The main lesson that can be drawn form the elaboration of the two regional reports is the importance of an assessment of the policy implementation by the entrepreneurs. Only having this last element, the assessment process can be considered comprehensive and complete.

The other lessons learned relate mainly to the procedural aspects of the process: the carry-out of the assessment, the coordination of the bilateral and regional meetings, etc.

All these aspect have been included in the activities of the current project.

4. Indicative Budget (amounts in €)

				SOURCES OF FUNDING								
		TOTAL EXP.RE	EU CONTRIBUTION		NATIONAL CONTRIBUTION			OECD CONTRIBL	UTION			
ACTIVITIES	IB (1)	INV (1)	EUR (a)=(b)+(c)+(d)	EUR (b)	%(2)	Total EUR (c)=(x)+(y)+(z)	% (2)	Central EUR (x)	Regional/ Local EUR (y)	IFIs EUR (z)	EUR (d)	% (2)
Direct Grant Agreement:	x		340 000	300 000	88.2						40 000	11.8
TOTAL IB		340 000	300 000	88.2						40 000	11.8	
TOTAL INV												
TOTAL PROJECT		340 000	300 000	88.2						40 000	11.8	

Amounts net of VAT

- (1) In the Activity row use "X" to identify whether IB or INV
- (2) Expressed in % of the **Total** Expenditure (column (a))

5. Indicative Implementation Schedule (periods broken down per quarter)

Contracts	Launch of Call of Proposals	Signature of contract	Project Completion
Direct Grant Agreement	N/A	Q4 2010	Q2 2012

6. Cross cutting issues (where applicable)

6.1 Equal Opportunity

The project will support gender equality for entrepreneurs. Furthermore, one of the Small Business Act principles states that the Member States should take measures 'to provide mentoring and support for female entrepreneurs'.

6.2 Environment

The project itself will not have a big impact on the environment, but the issue of environment is partially addressed under the SBA. According to principle IX of the SBA 'the EU and the Member States should enable SMEs to turn environmental challenges into opportunities'.

6.3 Minorities

Although the minority issue is not as such addressed through the project or the SBA, the monitoring and support of immigrants who want to become entrepreneurs is covered by the SBA.

ANNEXES

- 1- Log frame in Standard Format
- 2- Amounts contracted and Disbursed per Quarter over the full duration of Programme
- 3- Description of Institutional Framework
- 4- Details per EU funded contract

ANNEX I: Logical framework matrix in standard format

LOGFRAME PLANNING MATRIX FOR Project Fiche	Implementation and follow-up of the Small Business Act (SBA)	CRIS No. 2010-022-029
	Contracting period expires: 30 November 2011	Disbursement period expires: 30 November 2014
	Total budget :340 000	IPA budget: 300 000

Overall objective	Objectively verifiable indicators	Sources of Verification	
The overall objective of the project is to improve the business environment in general and for SMEs in particular.	The business environment has many different components and is very complex. However, the 10 principles of SBA cover the main elements. Therefore, Following the implementation of all these components of the SME policy will motivate the countries to improve their performance and the partner organisations will provide guidance in this respect. The indicators in this context will be the improvement in scores, measurement done by different organisations.	 The SME Policy Index World Bank Doing Business The Global Competitiveness Report SME Performance Review 	
Project purpose	Objectively verifiable indicators	Sources of Verification	Assumptions
help the pre-accession region to implement the Small Business Act, especially by improving the overall	The identification of the new steps to be taken during and after this process. Improved performance under the common aspects of the two policy documents.	- The Progress Reports - The SME Policy Index - SME Performance Review	Commitment and cooperation of local authorities
Results	Objectively verifiable indicators	Sources of Verification	Assumptions
The endorsement of the new SME policy index	The new SME policy index	The letters of endorsement	
The information and evaluation of the developments of the SME policy (based on the SME policy index)	The filled-in and verified self-assessments and independent assessments	These assessments will be exchanged between the government, the independent assessor and partner organisations, after they will be completed. The partner organisations will present these documents upon request to the financing institution.	
Results of the company survey and	The analysis of the results of the company survey and the focus	The partner organisations will present these documents	

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the focus groups	groups	upon request to the financing institution. The main	
		results will be published in an electronic newsletter.	
The organisation of a bilateral	Exchange of the assessments between the stakeholders present at	The list of participants	
meeting in each of the countries of	the meeting.	The minutes of the meeting	
the pre-accession region.	The main stakeholders in each country will be present at the meeting	Coverage in the local press (where available).	
2011 Regional report on the	Elaboration and the publication of the report	The report will be available in electronic format on the	
Implementation of the SBA		websites of the partner organisations	
		The report will be available on paper support.	
A regional conference two launch	Participation of at least two representatives per country.	List of participants	
the report	Participants from the European Commission	Conference agenda	
•		Media coverage	
Improvement in the three policy	New measures introduced or the improvement of the current	Increase in scores of different International	
areas identified for each partner	programmes in the partners	organisation on the specific topic.	
Activities	Means	Costs	Assumptions
Activity 1 – Elaboration of a new	The European Commission will conclude a Direct Grant	EUR 300 000	•
set of indicators and monitoring	Agreement with OECD		
tools, combining elements of the			
Charter and the SBA.			
Activity 2 – Cross country policy			
evaluation based of the new set of			
policy indicators and monitoring			
tools.			
Activity 3 – Organisation of			
company surveys and/or focus			
groups in all the beneficiary			
countries and integration of results			
of company surveys/focus groups			
into the evaluation exercise.			
Activity 4 – Consultation with the			
governments and stakeholder in the			
region			
Activity 5 – Elaboration and			
publication of the Regional			
Progress report			
Activity 6 – Dissemination and			
presentation of the Regional			
Progress Report			
Activity 7 – Monitoring of priority			
action implementation and support			
in policy implementation			
in poncy implementation		I	

ANNEX II: amounts (in €) Contracted and disbursed by quarter for the project

Contracted	Q4 2010							
Direct Grant Agreement	300 000							
Cumulated	300 000							
Disbursed	Q4 2010	Q1 2011	Q2 2011	Q3 2011	Q4 2011	Q1 2012	Q2 2012	Q3 2012
Direct Grant Agreement	180 000							120 000
Cumulated	180 000							300 000

ANNEX III: Description of Institutional Framework

The partner organisations will work in each Beneficiary with one or more authorities. In this respect in each Beneficiary, a coordinator will be nominated in order to make the implementation of the process easier. The table below includes only the coordinating authority in the previous process and the other main authority in the area of SME policy.

Beneficiary	Coordinating authority	Other authorities
ALBANIA	ALBINVEST Export Promotion and SME Development Division	Ministry of Economy, Trade and Energy
BOSNIA AND HERZEGOVINA	Ministry of Foreign Trade and Economic Relations Department for Economic Development and Entrepreneurship	
CROATIA	Ministry for Economy, Labour and Entrepreneurship Directorate for SMEs	Croatian Agency for Small Enterprises (HAMAG)
KOSOVO	SME Support Agency	Ministry of Trade and Industry
THE FORMER YUGOSLAV REPUBLIC OF MACEDONIA	Ministry of Economy Support of Entrepreneurship and Competitiveness of SME Department	Agency for Promotion of Entrepreneurship
MONTENEGRO	Directorate for the Development of SMEs	Ministry of Economy
SERBIA	Ministry of Economy and Regional Development SME sector	Agency for the Development of SMEs

ANNEX IV: Details per EU funded contract

The European Commission will sign a Direct Grant Agreement with OECD in Q4 2010 based on Article 168(1)(f) of the Implementing Rules of the Financial Regulation.

Implementation will be sub-delegated to DG ENTR by DG ELARG.

	Type of Contract	Amount in EUR	Duration
Contract 1	Direct Grant Agreement	300 000	18 months

The grant beneficiary should contribute with a minimum of 11,8% of the total eligible cost of the project.