

Ex post evaluation – Georgia

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Sector: Civilian peace-building, conflict prevention and resolution (CRS code: 15220)
Project: Infrastructure Rehabilitation in West Georgia (BMZ No.: 2008 66 202*)
Implementing agency: Municipal Development Fund of Georgia (MDF)



Ex post evaluation report: 2019

All figures in EUR million	Project Inv. (Planned)	Project Inv. (Actual)	Project CM (Planned)	Project CM (Actual)
Investment costs (total)	12.00	11.52	0.25	0.25
Counterpart contribution	2.00	1.52	0.00	0.00
Funding	10.00	10.00	0.25	0.25
of which BMZ budget funds	10.00	10.00	0.25	0.25

*) Random sample 2018

Summary: During and as a result of the wars over the breakaway provinces of Abkhazia and South Ossetia in 1991 and 1992, official figures indicate that 220,000 people fled to Georgia proper. Some of the internally displaced persons (IDPs) were housed with relatives, others in converted public buildings. These buildings generally do not meet the conditions for long-term accommodation under adequate housing conditions. In 2007, the Georgian government finally adopted a strategy to deal with the IDPs. The main objective was still to create the conditions for a dignified and safe return of the IDPs. The sub-goals included promoting humane living conditions for the IDPs and their integration into Georgian society. As part of the project, three accommodations were renovated and partly extended in the West Georgian towns of Poti, Kutaisi and Tskaltubo. In the city of Zugdidi, 10 new apartment blocks were built. Housing units were to be transferred to IDPs as property to compensate them. This was in line with the reorganisation of Georgian housing policy following the collapse of the Soviet Union.

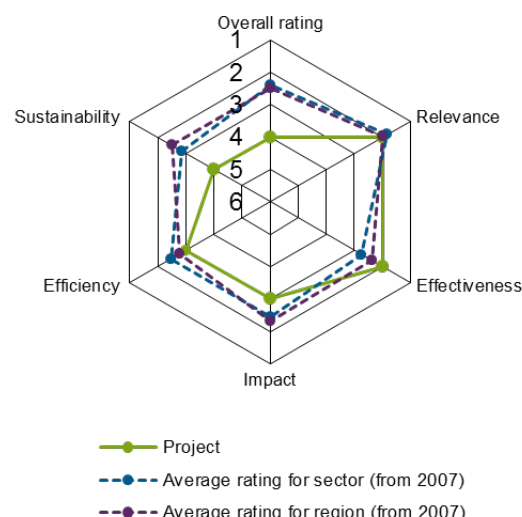
Objectives: The objectives of the FC measure were to significantly improve the housing situation of internally displaced persons (IDPs) in Georgia using existing refugee accommodation (outcome). This was to help (i) promote humane living conditions for the IDPs and (ii) their integration into Georgian society (impact).

Target group: The target group comprises the internally displaced persons who at the time of the project appraisal were living in the emergency accommodation to be renovated during the project, as well as the IDPs who moved into the new building in Zugdidi.

Overall rating: 4

Rationale: The sustainability of the project with regard to a long-term improvement in housing conditions is limited due to moisture problems, mould infestation, and the associated safety and potential health risks. Currently only a part of the housing is affected. Nevertheless, the shortcomings are assessed so serious that the sustainability of the project can no longer be rated as satisfactory.

Highlights: The project was appraised under Note 47 of the FC/TC Guidelines. From the perspective of the evaluation, however, and due to the long time between the conflict and the appraisal of the project (16 years), it is not possible to claim an “immediate launch and swift implementation of measures” as defined in Note 47.



Rating according to DAC criteria

Overall rating: 4

Ratings:

Relevance	2
Effectiveness	2
Efficiency	3
Impact	3
Sustainability	4

Relevance

During and as a result of the wars over the breakaway provinces of Abkhazia and South Ossetia in 1991/92, official figures indicate that 220,000 people fled to Georgia proper. At the time of the project appraisal, after the conflicts, 95,000 internally displaced persons (IDPs) were still living in emergency accommodation, either with host families or often in dilapidated public buildings. Given that IDP status is granted based on family background, the number of IDPs is continuously rising in line with the birth rate. According to figures from the Georgian government, there were 259,247 registered IDPs (86,283 IDP families) in 2014, whereby in 2018, there were 280,055 IDPs (89,322 IDP families) living in Georgia proper. This corresponds to around 7% of the Georgian population.

On 2 February 2007, the State Strategy on IDPs was adopted by government decree (Decree of the Georgian Government #47). In addition to the goal of ensuring the dignified and safe return of IDPs, supporting IDPs by creating humane living conditions and ensuring their participation in society were set as initial objectives. To achieve this, the Action Plan adopted in 2009 agreed on the provision of permanent housing, including the transfer of property ownership rights to IDPs, among other measures. Initially, the plan was simply to renovate and privatise the public buildings already occupied by the IDPs. Due to the high demand, since 2010 it has also been possible to offer IDPs permanent – i.e. privatised – housing solutions in the form of vacant public buildings, new buildings and private apartments or houses which have been purchased by the state. The project was thus in line with the priorities of the Georgian government and met the needs of the IDPs.

The transfer of property rights played a decisive political role as it permanently compensated the IDPs for the loss of their property in the breakaway provinces, and this is still the case today. In 2005, the proportion of homeowners in Georgia was 95%. This very high rate of home ownership compared to other European countries is due to the reorganisation of Georgian housing policy following the collapse of the Soviet Union. Almost 100% of state-owned housing was privatised in the 1990s with ownership of the flats/houses transferred to residents free of charge (World Bank, 2013).

The results chain underlying the project (“adapt housing conditions of emergency accommodation to Georgian standards → improvement of housing conditions for IDPs → direct promotion of humane living conditions for IDPs → contribution to the integration of IDPs into Georgian society”) is only partially plausible. Surveys show the provision of permanent housing solutions to be an important component for integration into Georgian society, but no explicit reference is made to any contribution to economic integration. In addition to provide permanent housing, ensuring adequate employment opportunities and access to public services are crucial for full integration (UNHCR 2015). These latter aspects were not sufficiently discussed during the project appraisal.

The Georgian government continues to give top priority to providing housing for IDPs who have not yet been compensated. According to the Ministry, around 51,000 IDP families have not yet received a long-term housing solution. Based on current figures, around 30,000 families are in the process of applying for a flat or house. To achieve this objective as quickly as possible, the Georgian government has increased its budget significantly. According to the Vice Minister, however, it is also becoming increasingly important to create employment opportunities for IDPs.

The project was assigned to the DC priority “Democracy, civil society and public administration” and was in accordance with the objectives of the BMZ’s cross-sectoral concept for crisis prevention, conflict management and promoting peace. To follow a “Do No Harm” approach, however (as is also anchored in the aforementioned cross-sectoral concept), it would have been necessary to take the needs of the local population into account when designing the project. This applies in particular to Zugdidi. In contrast to the other project locations which had been home to IDPs for more than 15 years at the time of the project appraisal, around 1,200 IDPs from all over Georgia relocated to Zugdidi during the project. This posed considerable challenges for the municipal infrastructure, e.g. the state-run kindergartens, and was thus a potential source of conflict between IDPs and the local population.

The FC-funded housing measures for IDPs were also supported by other donors, including the EU and USAID. Harmonisation was ensured by the fact that the infrastructure projects of other donors were also implemented via the Municipal Development Fund of Georgia (MDF).

From today’s perspective, we rate the relevance of the measures as high. The housing situation in the emergency accommodations which have not yet been renovated is disastrous. One of the kindergartens visited by the mission is also used as an emergency accommodation, which has created an untenable situation for the residents of the emergency accommodation and especially for the children. Despite the described compromises in respect of the local population, the relevance is rated as good given that the needs are still high.

Relevance rating: 2

Effectiveness

The objective of the FC measure was to substantially improve the housing conditions of IDPs in refugee accommodation (outcome).

The target achievement at the outcome level can be summarised as follows:

Indicator	Status PA, target PA	Ex post evaluation
(1) Number of IDPs living in renovated or newly-built flats with their own sanitary facilities.	0; target value: approximately 1,025 ¹ (PA); 1,825 (after additional financing)	Achieved: 2,185 (2016) ²
(2) The number of square metres per person in the renovated/newly-built flats corresponds to the Georgian average once construction measures are complete.	0; target value: 21.57m ² /person ³ at each location	Not achieved: 19.71m ² /person (average)
(3) The ownership rights to the renovated or newly-built flats have been transferred to at least 85% of residents.	0; target value: 85% at each location	Achieved: ⁴
(4) At least 85% of residents state that their housing situation has substantially improved.	0; target value: 85% at each location	Achieved: 95% on average (between 87 and 98% depending on location)

¹ The target values defined at the project appraisal were based on estimates. The target group was downsized after the selection of the buildings eligible for renovation. This explains the discrepancy between the original target group size, the target group size after the additional financing and the number of IDPs relocated to the new build in Zugdidi.

² Of which 754 in renovated flats, 1,221 in newly-built flats and 210 in houses or flats purchased using residual funds. (Project Completion Report, November 2016)

³ National Statistics Office of Georgia, GEOSTAT (2014)

⁴ By location: Zugdidi: 96%, Kutaisi: 100%, Tskaltubo: 87%, Poti: 83%. (Municipal Development Fund of Georgia, MDF)

Indicator 1: The target figure corresponded to the number of people who lived in the buildings prior to the renovation. Following the additional financing of the measure for the new build in Zugdidi, the target group increased by around 1,300 IDPs. The indicator being exceeded is due to the 72 flats/houses in rural areas acquired through the use of residual funds, as well as by the Georgian government's decision to convert the attics in Poti and Kutaisi into flats.

As of the ex post evaluation, 24% of the IDPs registered following completion of the project had temporarily or permanently relocated. The reasons for this are diverse: migration abroad, relocation to other Georgian cities, marriage, divorce, death, etc. In the majority of cases, the accommodations remained in the possession of the original beneficiary families and are still used by them (3% were sold, 7% rented) the indicator was thus considered fulfilled at the time of the ex post evaluation.

Indicator 2: In the case of Tskaltubo, the indicator was 25.35m² per person and thus exceeded. With an average family size of 3.1 people, there is nearly 12m² more available space per family compared to the average Georgian family. However, the indicator was not fulfilled for Poti, Kutaisi and Zugdidi. Extrapolated for an average family, these locations offer between 7m² and 14m² less available space per family compared to the Georgian average. The living space calculations only partially coincide with the perceptions of residents. During on-site visits, residents were asked how they would rate the size of their accommodation as compared to that of the local population. The residents of Zugdidi in particular believed their accommodation was too small. In Poti and Tskaltubo, the residents were overwhelmingly positive about the size of their accommodation, finding them to be sufficient and in some cases even "better" than that of the local population. An 11–21% reduction in living space is undoubtedly significant, however, in terms of equal treatment with the local population an upwards deviation is also not desirable – as in the case of Tskaltubo, which was 18% above the average. It should be taken into account, however, that the given target value is an average figure. Even if no information is available on the variance in accommodation size, it seems plausible to assume that the residences of non-IDP families also deviate from the average value in both an upwards and downwards direction. Accordingly, we consider a certain variance in the sizes of the renovated/newly-built accommodation to be acceptable. Moreover, and in the case of existing buildings in particular, there may be structural considerations which make it impossible to enlarge the overall living space.

Indicator 3: Seven socially disadvantaged families without IDP status live in the renovated building in Poti. These families were living here prior to the renovation and moved back into the accommodation after the measures were completed. Due to the families' lack of IDP status it has not yet been clarified whether ownership can be transferred. If we exclude the seven families for whom ownership has not been transferred for legal reasons, the target achievement in Poti is 89% rather than 83%. This means that the indicator has been achieved for all locations. The MDF data was also confirmed by the results of the resident survey conducted as part of the ex post evaluation. A total of 366 IDPs were surveyed across four locations (Zugdidi: 233, Poti: 64, Kutaisi: 64, Tskaltubo: 15). This corresponds to 25% of residents over the age of 15 at each location. Based on the survey findings, any refusal to the transfer of ownership is attributable mainly to the size and/or condition of the accommodation in question. Eight of the 233 IDPs surveyed in Zugdidi and two of the 15 surveyed in Tskaltubo stated that they had not agreed to the transfer of ownership for these reasons.

Indicator 4: As with the impact indicators, the data for indicator 4 was collected through the above-mentioned resident survey conducted as part of the ex post evaluation.

95% of the IDPs surveyed stated that their housing situation had improved significantly after moving into the renovated/newly-built flats; 4% thought the improvements were only marginal. 1% of the IDPs surveyed did not see any improvement compared to their situation prior to the renovation. In absolute terms, this corresponds to "just" two of the 366 IDPs surveyed. The two IDPs in question live with their families in Tskaltubo. Visits to the respective accommodations revealed them to be in a dire condition. The walls are covered in mould, damp spots have formed on the walls and floors, the flooring in one of the flats has come off due to the damp, and large sections of the kitchen floor consists only of cement. The tiles are

falling off the walls in the bathroom, while in other rooms the plaster is crumbling in many places due to the damp. Although these may be isolated cases which do not jeopardise the achievement of objectives as measured by the indicators, the mission considers the situation to be worrying (however: cf. Sustainability).

Given that the overwhelming majority of surveyed IDPs stated that their housing situation had substantially improved, the effectiveness was nevertheless assessed as good.

Effectiveness rating: 2

Efficiency

The time required to implement the project was extended by 46 months compared to the original estimate, to a total of 93 months. The estimated total costs were not exceeded though. In fact, at EUR 11.52 million they were slightly below the estimated costs of EUR 12.25 million. The delays were related in particular to identify buildings for renovation, and to clarify the ownership rights of these buildings. As the project progressed, the requirement for at least 75% of the residents to approve the renovation measures also led to further delays. The Georgian government initially failed to fulfil its obligation to provide the affected families with alternative housing for the duration of the construction period. Many families therefore had to move to relatives on a temporary basis. The remaining families were ultimately provided with alternative housing. It was not until 2011 that the required 75% approval rate for the renovations was achieved.

Once new builds were approved by Georgia as a further option for creating long-term housing solutions (in 2010), the next step required the development of transparent award criteria to select eligible people. This step also caused delays in Zugdidi.

In addition, the implementation capacity of the project-executing agency was overestimated at the appraisal. After the MDF initially failed to supervise the works properly, according to statements from the fund itself, the project-executing agency was supported in this by an international consultant. No clear answer can be given on the extent to which the implementation structure – involving both the Ministry and the MDF on the Georgian side – led to delays. Both sides assured the mission that the division of tasks had been clear and that the cooperation had been collaborative. Despite these assurances, a consultant was called in during the project implementation to facilitate coordination between the two bodies. This indicates towards certain inefficiencies in the implementation structure.

The management and consulting costs amounted to around 8.9% of the total project costs and can be considered reasonable. These costs include remuneration of 2.4% for the MDF.

At EUR 223.67 per square metre, excluding land plot, the specific investment costs are around the industry standard for a new build (comparative figures: EUR 139–222 per square metre). The specific investment costs in the renovated buildings were around EUR 231 per square metre. Despite the slightly better production efficiency of a new build compared to a renovated building, we rate the allocation efficiency of renovations much higher than that of new builds. The on-site visits clarified that there were significant (integration) problems among the residents in the new apartment complex, with some of these issues continuing to this day (cf. Impact).

The overall efficiency is considered satisfactory.

Efficiency rating: 3

Impact

At the impact level, the project should help (i) the promotion of humane living conditions for IDPs and (ii) their integration into Georgian society.

The achievement of the objectives at the impact level can be summarised as follows:

Indicator	Status PA, target PA	Ex post evaluation
(1) More than 60% state that their socio-economic prospects have substantially improved.	n/a; > 60% at each location	Partially achieved: Zugdidi: 80% Tskaltubo: 80% Poti: 52% Kutaisi: 41%
(2) More than 60% state that they consider themselves as equal members of Georgian society.	n/a; > 60% at each location	Achieved: between 93 and 100% depending on location
(3) More than 60% have non-IDP friends and/or acquaintances.	n/a; > 60% at each location	99% (average)

Indicator 1: The assessment of whether socio-economic prospects have improved since moving in varies greatly from location to location. Although the values for indicator 1 are considerably higher in Zugdidi and Tskaltubo than in Poti and Kutaisi, the unemployment rate among the IDPs surveyed is higher in Zugdidi and Tskaltubo – at 80% and 53% respectively – than in Poti and Kutaisi, where 50% of the survey respondents stated that they were unemployed. No information was available regarding changes in the work situation since moving into the accommodation. However, there is no evidence to suggest that the work situation at the locations has developed any differently. Therefore, the discrepancy in indicator 1 cannot be plausibly explained by the unemployment rate. One possible explanation could be the increase in the governmental financial support for IDPs as of 2015. Prior to 2015, all IDPs received 14 Georgian lari (GEL) per person per month (EUR 4.71) based on their status and regardless of their economic situation; as of 2015, this IDP benefit was increased to GEL 45 per person per month (EUR 15.15). The IDPs relocated to their new accommodations between 2011 and 2015. As such, it appears at least plausible that the respondents tied these two events together in retrospect, which thus potentially explains the minimum 40% agreement of all respondents regarding a significant improvement in socio-economic prospects. This explanation applies to Zugdidi in particular. The IDPs moved to the accommodations in Zugdidi in May 2015 – the same year in which the IDP financial support more than tripled. Furthermore, the high indicator achievement in Zugdidi is presumably also attributable to the economic situation of the residents. The residents of Zugdidi were selected based on social criteria; according to the local NGO, 85% of the residents in Zugdidi today are socially disadvantaged. Even if there are no reliable figures on the proportion of socially disadvantaged residents for the other locations, the selection criteria applied in Zugdidi make it likely that the proportion here is higher. Consequently, the IDP benefit for families in Zugdidi accounts for a larger share of household income, and could in turn explain the higher indicator achievement as compared to Kutaisi and Poti.

Despite the fact that indicator 1 was not achieved in Poti, some residents identified an indirect connection here between the project and their socio-economic perspectives. Some residents reported that while the renovation had not improved their economic situation in real terms, the motivation among residents had noticeably increased. This is evident from the numerous ventures undertaken by residents, some even generating income, such as the opening of a nail studio on the site, beekeeping, the creation of allotment gardens, the organisation of computer and music courses, and the establishment of a book club. One further point related to the improvement of general living conditions is that the children living in the accommodations are no longer ashamed to invite their friends from school to their homes. In rare cases, the residences transferred into private ownership have been used by banks as collateral for loans. Despite these positive anecdotes, the partial achievement of indicator 1 cannot plausibly be associated with the project.

Indicators 2 and 3: Despite the high indicator achievement and the positive impressions gained by the mission on the ground, it is not plausible to attribute the achievement of indicators 2 and 3 in full to the

project. However, based on the UNHCR's findings that the provision of long-term housing is an important building block for integration (cf. Relevance), we assume that the project has made an important contribution to individual aspects of integration.

In Zugdidi, integration among residents is a problem. Three young women explained that they did not feel comfortable in the housing estate in Zugdidi as there were often disputes and even some cases of violence between residents. This was confirmed by the local NGO, which organised integration measures for residents as part of the complementary measure. The poor integration among residents is because the residents of Zugdidi have been refugees in various parts of Georgia since the beginning of the 1990s and have built up social networks, etc. in these places. When they relocated to Zugdidi they had to start all over again, and could not rely on a community developed over many years as they had done in these other locations. Speaking in this context, a member of staff at the MDF described the IDPs in Zugdidi as twice internally displaced.

On the whole, we assess the overarching developmental impact as satisfactory.

Impact rating: 3

Sustainability

To this day, the widespread transfer of housing into private ownership following the collapse of the Soviet Union (cf. Relevance) leads to failings in the maintenance of communal areas. Homeowners' associations took over official responsibility for smaller maintenance measures to ensure the "day-to-day functioning" of residential buildings in 2007. However, the local authority must assume 50–90% of the costs for major maintenance measures, such as roofs or stairwells (World Bank 2013). The condition of the stairwells, facades, etc. in the multi-family buildings (non-IDP accommodation) visited by the mission for the purposes of comparison was generally poor: broken stairs, out-of-order lifts, broken staircase windows, etc. The individual flats also visited for the purposes of comparison were all in a good to very good condition, which was surprising given the condition of the stairwells. This illustrates the difficult legal situation with regard to the maintenance of communal property, and has therefore been taken into account in the assessment of sustainability.

The maintenance team set up as part of the complementary measure still exists, and it carries out minor maintenance work in the private apartments and on communal areas of the property. At the sites visited, the stairwells and surrounding property were largely clean and in an acceptable condition. In Zugdidi, it was evident that some of the more hidden areas on the large land had not been cleaned for some time (rubbish, nettles). Aside from this though, the property was relatively clean. The mission requested and was shown the machines purchased as basic equipment for the maintenance work, as well as the remaining repair materials. These appear to have been used, which supports the impression that small jobs are carried out. As planned, the workers on the maintenance teams should be remunerated for their work. Remuneration was paid until the funds made available under the complementary measure were exhausted. The residents now pay only for the material costs and the work carried out by the maintenance team is rarely remunerated. Repairs to the communal areas of the property are financed in part by all residents, partially by those who have the financial capacity. In Poti, for example, a coin-operated machine was installed in the lift in order to ensure that only the users have to contribute to the maintenance and repair costs

Zugdidi is the exception. The maintenance team in Zugdidi does not appear to function as well as in the other locations. Some residents were unaware that a maintenance team existed. Paying for the necessary materials also poses a problem for residents. This is not surprising given the high number of socially deprived residents in Zugdidi (cf. Impact). In addition, there is a definite attitude of entitlement in comparison to the other locations with residents feeling that "someone" should take care of the necessary repairs. As a result, even smaller and less expensive maintenance work is not carried out. For example, a water tap that could no longer be turned off was only replaced by the maintenance team once requested by the mission.

The overall assessment, however, is that the maintenance and repair measures required of the maintenance teams are within their capabilities. The common areas (stairwells, courtyard) are often in an even

better condition than those in the non-IDP accommodations visited. This is not so much a case of better maintenance, but rather that the buildings are newer.

The condition of the facade in Poti and of the glazed stairwell in Tskaltubo are worrying. In Poti, the roof is completely flush with the facade in several places, meaning that rainwater runs straight down the building facade. There is no drainage. This has led to significant problems with damp walls and mould both inside and outside the building. The area where the electricity meters are installed is also severely affected by damp. If this is not remedied, the building's power supply is likely to fail in the short to medium term. This issue is also a safety risk. The glazing in the stairwell in Tskaltubo (no safety glass) is partially broken. There is a risk that the glass may fall on children playing or on people in the inner courtyard. It has been fixed provisionally with adhesive tape. In addition to this, there have been – sometimes quite considerable – problems with the ingress of moisture in individual flats at all the locations visited; this leads to large damp spots and severe mould in the affected flats. In Tskaltubo, two flats in particular are in a very poor condition (cf. Effectiveness). While the state of these flats is particularly bad, serious problems with mould have also been found in Tskaltubo, as well as in several flats in Poti and Zugdidi. We assume that the existing – and sometimes severe – issues with damp and mould can be traced back to structural failings (e.g. inadequate drainage systems, failure to repair old damp walls, leaky pipe connections and roofs and walls which are not watertight), rather than to insufficient maintenance or incorrect usage.

Overall, in terms of the long-term improvement of housing conditions we consider the sustainability to be either limited or jeopardised as a result of the issues with damp and mould described above, and which can also pose a significant risk to health. Although only a small number of the flats are currently affected, we consider these shortcomings to be so serious that the sustainability of the project can no longer be assessed as satisfactory. Moreover, we do not expect this situation to improve in the future.

Sustainability rating: 4

Notes on the methods used to evaluate project success (project rating)

Projects (and programmes) are evaluated on a six-point scale, the criteria being **relevance, effectiveness, efficiency** and **overarching developmental impact**. The ratings are also used to arrive at a **final assessment** of a project's overall developmental efficacy. The scale is as follows:

Level 1	Very good result that clearly exceeds expectations
Level 2	Good result, fully in line with expectations and without any significant shortcomings
Level 3	Satisfactory result – project falls short of expectations but the positive results dominate
Level 4	Unsatisfactory result – significantly below expectations, with negative results dominating despite discernible positive results
Level 5	Clearly inadequate result – despite some positive partial results, the negative results clearly dominate
Level 6	The project has no impact or the situation has actually deteriorated

Rating levels 1-3 denote a positive assessment or successful project while rating levels 4-6 denote a negative assessment.

Sustainability is evaluated according to the following four-point scale:

Sustainability level 1 (very good sustainability): The developmental efficacy of the project (positive to date) is very likely to continue undiminished or even increase.

Sustainability level 2 (good sustainability): The developmental efficacy of the project (positive to date) is very likely to decline only minimally but remain positive overall. (This is what can normally be expected).

Sustainability level 3 (satisfactory sustainability): The developmental efficacy of the project (positive to date) is very likely to decline significantly but remain positive overall. This rating is also assigned if the sustainability of a project is considered inadequate up to the time of the ex post evaluation but is very likely to evolve positively so that the project will ultimately achieve positive developmental efficacy.

Sustainability level 4 (inadequate sustainability): The developmental efficacy of the project is inadequate up to the time of the ex post evaluation and is very unlikely to improve. This rating is also assigned if the sustainability that has been positively evaluated to date is very likely to deteriorate severely and no longer meet the level 3 criteria.

The **overall rating** on the six-point scale is compiled from a weighting of all five individual criteria as appropriate to the project in question. Rating levels 1-3 of the overall rating denote a "successful" project while rating levels 4-6 denote an "unsuccessful" project. It should be noted that a project can generally be considered developmentally "successful" only if the achievement of the project objective ("effectiveness"), the impact on the overall objective ("overarching developmental impact") and the sustainability are rated at least "satisfactory" (level 3).