



**EN**

**THIS ACTION IS FUNDED BY THE EUROPEAN UNION**

**ANNEX 8**

to the Commission Implementing Decision on the financing of the multi-country multiannual action plan on an EU Civil Society Facility and Media Programme in favour of the Western Balkans and Türkiye for 2024-2025

**Action Document for “EU Civil Society Facility and Media Programme for the Republic of Türkiye for 2024-2025”**

**MULTIANNUAL ACTION PLAN**

This document constitutes the multiannual work programme in the sense of Article 110(2) of the Financial Regulation, and annual and multiannual action plans and measures in the sense of Article 9 of IPA III Regulation and Article 23(2) of NDICI - Global Europe Regulation.

**1. SYNOPSIS**

**1.1. Action Summary Table**

<b>Title</b>	<b>EU Civil Society Facility and Media Programme for the Republic of Türkiye 2024-2025</b> Multi-country multiannual action plan on an EU Civil Society Facility and Media Programme in favour of the Western Balkans and Türkiye for 2024-2025
<b>OPSYS</b>	OPSYS business reference: ACT-62286
<b>ABAC</b>	ABAC Commitment level 1 number: JAD.1299145 (allocation 2024) JAD.1299146 (allocation 2025)
<b>Basic Act</b>	Financed under the Instrument for Pre-accession Assistance (IPA III)
<b>Economic and Investment Plan (EIP)</b>	No
<b>EIP Flagship</b>	No
<b>Team Europe</b>	No
<b>Beneficiar(y)/(ies) of the action</b>	The action shall be carried out in Türkiye
<b>Programming document</b>	IPA III Programming Framework
<b>PRIORITY AREAS AND SECTOR INFORMATION</b>	

<b>Window and thematic priority</b>	Window 1. Rule of law, fundamental rights and democracy Thematic Priority 5: Fundamental rights (with reference to media - freedom of expression) 9.3 % Thematic Priority 7: Civil Society 90.7%			
<b>Sustainable Development Goals (SDGs)</b>	Main SDG (1 only): SDG 16: Peace Justice and Strong Institutions Other significant SDGs (up to 9) and, where appropriate, targets: SDG 05: Gender Equality SDG 10: Reduce Inequalities SDG 11: Sustainable cities and communities SDG 13: Climate Action SDG 17: Partnership for the Goal			
<b>DAC code(s)</b>	15150 Democratic participation and civil society 90.7%-percentage 15153 Media and free flow of information 9.3% -percentage			
<b>Main Delivery Channel</b>	20000 Non Governmental Organisations and Civil Society 41000 United Nations agency, fund or commission (UN) 47000 - Other multilateral institution 60000 - Private sector institution			
<b>Targets</b>	<input checked="" type="checkbox"/> Climate <input checked="" type="checkbox"/> Gender <input type="checkbox"/> Biodiversity			
<b>Markers (from DAC form)</b>	<b>General policy objective</b>	<b>Not targeted</b>	<b>Significant objective</b>	<b>Principal objective</b>
	Participation development/good governance	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Aid to environment	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	Gender equality and women's and girl's empowerment	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	Reproductive, maternal, new-born and child health	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	Disaster Risk Reduction	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	Inclusion of persons with Disabilities	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	Nutrition	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<b>RIO Convention markers</b>	<b>Not targeted</b>	<b>Significant objective</b>	<b>Principal objective</b>
	Biological diversity	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Combat desertification	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Climate change mitigation	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	Climate change adaptation	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Internal markers and Tags**

<b>Policy objectives</b>	<b>Not targeted</b>	<b>Significant objective</b>	<b>Principal objective</b>
EIP	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
EIP Flagship	YES <input type="checkbox"/>		NO <input checked="" type="checkbox"/>
Tags:	YES		NO
Transport	<input type="checkbox"/>		<input checked="" type="checkbox"/>
Energy	<input type="checkbox"/>		<input checked="" type="checkbox"/>
Environment and climate resilience	<input type="checkbox"/>		<input checked="" type="checkbox"/>
Digital	<input type="checkbox"/>		<input checked="" type="checkbox"/>
Economic development (incl. private sector, trade and macroeconomic support)	<input type="checkbox"/>		<input checked="" type="checkbox"/>
Human Development (incl. human capital and youth)	<input type="checkbox"/>		<input checked="" type="checkbox"/>
Health resilience	<input type="checkbox"/>		<input checked="" type="checkbox"/>
Migration and mobility	<input type="checkbox"/>		<input checked="" type="checkbox"/>
Agriculture, food security and rural development	<input type="checkbox"/>		<input checked="" type="checkbox"/>
Rule of law, governance and Public Administration reform	<input type="checkbox"/>		<input checked="" type="checkbox"/>
Other	<input type="checkbox"/>		<input checked="" type="checkbox"/>
Digitalisation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Tags	YES		NO
digital connectivity	<input type="checkbox"/>		<input checked="" type="checkbox"/>
digital governance	<input type="checkbox"/>		<input checked="" type="checkbox"/>
digital entrepreneurship	<input type="checkbox"/>		<input checked="" type="checkbox"/>
digital skills/literacy	<input type="checkbox"/>		<input checked="" type="checkbox"/>
digital services	<input type="checkbox"/>		<input checked="" type="checkbox"/>
Connectivity	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Tags	YES		NO
digital connectivity	<input type="checkbox"/>		<input checked="" type="checkbox"/>
energy	<input type="checkbox"/>		<input checked="" type="checkbox"/>
transport	<input type="checkbox"/>		<input checked="" type="checkbox"/>
health	<input type="checkbox"/>		<input checked="" type="checkbox"/>
education and research	<input type="checkbox"/>		<input checked="" type="checkbox"/>
Migration	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Reduction of Inequalities	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	COVID-19	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>BUDGET INFORMATION</b>				
<b>Amounts concerned</b>	<p>Budget line: 15.020101.01</p> <p>Total estimated cost: <b>EUR 43 550 000</b></p> <p>Total amount of EU budget contribution: <b>EUR 43 000 000</b></p> <p>The EU contribution is for an amount of <b>EUR 21 200 000</b> from the general budget of the European Union for financial year <b>2024</b> and for an amount of <b>EUR 21 800 000</b> from the general budget of the European Union for financial year <b>2025</b>, subject to the availability of appropriations for the respective financial years following the adoption of the relevant annual budget, or as provided for in the system of provisional twelfths.</p> <p>This action is co-financed in joint co-financing by:</p> <ul style="list-style-type: none"> <li>- Grant beneficiaries for an amount of <b>EUR 550 000</b>.</li> </ul>			
<b>MANAGEMENT AND IMPLEMENTATION</b>				
<b>Implementation modalities (management mode and delivery methods)</b>	<p><b>Direct management</b> through:</p> <ul style="list-style-type: none"> <li>- Grants</li> <li>- Procurement</li> </ul> <p><b>Indirect management with</b> the United Nations Population Fund (UNFPA), the Council of Europe (CoE), the United Nations Development Programme (UNDP).</p>			
<b>Final date for concluding contribution / delegation agreements, procurement and grant contracts</b>	<p>For 2024 Budget: At the latest by 31 December 2025</p> <p>For 2025 Budget: At the latest by 31 December 2026</p>			
<b>Indicative operational implementation period</b>	<p>For 2024 Budget: 72 months following the adoption of the Financing Decision</p> <p>For 2025 Budget: 84 months following the adoption of the Financing Decision</p>			

## 1.2. Summary of the Action

The **overall objective** of this action is to strengthen participatory democracy and the EU integration and approximation process in Türkiye through a reinforced contribution by civil society and media. The action will focus on strengthening operational capacities of civil society organisations (CSOs); improving CSO's monitoring capacities on human and fundamental rights; enhancing the right to freedom of expression by reinforcing the capacities of media actors. The action is articulated in ten projects, complemented by support measures for the overall implementation. Building on the results achieved through successful projects and on recommendations from external evaluations, it will include several activities providing financial support to third parties combined with capacity-building. CSOs working on human rights and fundamental freedoms and rights-based organisations are the action's main beneficiaries. Enhanced focus is dedicated to vulnerable groups and those in need of continued support or less targeted in the past by EU's support. In particular, support will be provided to CSOs working on women empowerment and prevention and response to gender based violence; on rights of Lesbian, Gay, Bisexual, Trans, Non-binary, Intersex and Queer (LGBTIQ) people; organisations and activists working on environment and climate change; organisations working on cultural rights, including minority rights, and, also in response to the recent earthquakes, organisations working on disaster risk management.

### 1.3 Beneficiar(y)/(ies) of the Action

The action shall be carried out in Türkiye.

## 2. RATIONALE

### 2.1. Context

Civil Society Organisations (CSOs) play an important role in ensuring the functioning of participatory democracies. An independent, pluralistic and competent civil society is crucial for any democracy. By articulating citizens' concerns, CSOs represent and nurture pluralism and contribute to more effective and inclusive policies. CSOs can also play an active role in fostering dialogue, peace and conflict resolution and in the implementation of the 2030 Agenda.

Türkiye has a dynamic and diversified civil society. The legal framework regulates the establishment and work of civil society organisations with respective laws for two main legal forms: associations and foundations. As of February 2023, there were around 101,773 associations and over 6,000 foundations operating alongside informal organisations such as platforms, initiatives, and informal groups. According to data provided by the Directorate General for Relations with Civil Society, 1,529 of these associations focus on the promotion and protection of rule of law, democracy and human rights.

The ability of CSOs to participate in different domains of public life depends on a set of preconditions commonly referred to as the enabling environment, for which different actors carry responsibility. To operate, CSOs need a functioning democratic legal and judicial system, giving them the *de jure* and *de facto* right to associate and secure funding, coupled with freedom of expression, access to information and participation in public life. The primary responsibility to ensure these basic conditions lies with the state.

The European Union (EU) support to civil society in Türkiye is guided by the DG NEAR Guidelines for EU support to civil society in enlargement region for 2021-2027<sup>1</sup>, which provides three overarching targets as enablers for civil society to play its dedicated role across any thematic area of work: (1) a conducive environment for civil society to carry out its activities; (2) strengthened cooperation and partnership between CSOs and public institutions; (3) reinforced capacity and resilience of CSOs to carry out their activities effectively.

Türkiye's Strategic Response, in its Thematic Priority 7 under Window 1, refers to the Civil Society Strategy Paper and Action Plan drafted by the Directorate General for Relations with Civil Society of the Ministry of Interior. The draft Strategy and Action Plan were published for open consultations in August 2022 and in mid-February 2023, however their formal adoption is still awaited. The strategy and Action Plan have 10 objectives respectively: 1) Updating of civil society legislation; 2) Development of digitalisation in civil society; 3) Establishment of transparent and accountable civil society; 4) Enhancement of public-CSO cooperation; 5) Promotion of volunteerism; 6) Strengthening capacity of CSOs; 7) Development of social entrepreneurship; 8) Increasing visibility of CSOs; 9) Establishing a conducive environment for participation in decision-making processes; and 10) Encouraging philanthropy and donation giving.

Complementary to projects under the CSF programme are those under the bilateral envelope with Türkiye, funded under the Instrument for Pre-Accession (IPA). One project, already ongoing, on supporting volunteerism and civic engagement<sup>2</sup>, and two upcoming projects, one on promoting women friendly service

---

<sup>1</sup> [https://neighbourhood-enlargement.ec.europa.eu/dg-near-guidelines-eu-support-civil-society-enlargement-region-2021-2027\\_en](https://neighbourhood-enlargement.ec.europa.eu/dg-near-guidelines-eu-support-civil-society-enlargement-region-2021-2027_en)

<sup>2</sup> IPA/2022/ 435-584 - Strengthened Civic Engagement to Improve Democratic Local Governance in Türkiye

delivery at municipal level<sup>3</sup> and another one on social entrepreneurship<sup>4</sup>. In addition there are recurrent projects on business dialogue and town twinning. Actions planned under the Financing Agreement with Türkiye involve national and local authorities, as well as other public bodies, such as the regional development agencies, thus can provide good complementarity in promoting a recognition of the role civil society can play in service delivery and in the overall accession process.

The EUD maintains close contacts with the Member States and donors having programmes in support to civil society and/or working on assistance to Syrians and other refugees/migrants.

## 2.2. Problem Analysis

The 2023 Türkiye Report<sup>5</sup> extensively describes the challenges faced by CSOs and human rights activists. The report states: *“Serious backsliding regarding the civil society environment continued. Civil society organisations faced increased pressure and shrinking space to operate, limiting their freedoms of expression, association and assembly. [...] The implementation of the Law on preventing financing of proliferation of weapons of mass destruction placed further restrictions on civil society organisations”*. In relation to the role of the civil society in the immediate aftermath of the February 2023 earthquakes, the report states that *“civil society faced pressure from the authorities when delivering aid on the ground and was prevented from reporting on the situation in the affected regions”*. However, *“in spite of these negative developments, civil society continued to be vocal and to participate actively in civic life, including by providing support to the people affected by the earthquakes”*.

The report continues highlighting the need for a *“systematic and inclusive mechanisms for the effective consultation of independent civil society organisations on new legislation and policies need to be put in place. [...] The legal framework regulating the work of civil society organisations lacks clarity and carries the risk of arbitrariness during implementation”*.

The Report also states that: *“Human rights organisations and human rights defenders faced judicial and administrative pressure, partly due to Türkiye’s broad definition of terrorism”*. *“Women’s organisations faced pressure in the form of defamation, detentions, investigations and arrests. Women activists also faced detentions and police violence while exercising their right to freedom of assembly. [...] Stigmatisation, hate speech and discriminatory discourse targeting LGBTIQ civil society organisations and persons remained very strong. Anti-LGBTIQ discourse was instrumentalised during the electoral campaign”*.

Regarding the financial capacity of civil society organisations, the report states that *“the Law on collection of aid continued to impose burdensome requirements for permits that discourage fundraising activities by civil society organisations and de facto limit civil society activities. The distribution of public funds to civil society organisations remained untransparent. Heavy taxation hampered the functioning and development of foundations and associations. [...] Foreign donors providing financial support to civil society in Türkiye were often slandered and beneficiary NGOs ran the risk of having their activities criminalised because they had received foreign funds”*.

Regarding freedom of expression, the report highlights that *“activities of journalists, writers, lawyers, academics, human rights defenders, opposition politicians and critical voices continued to be restricted through arrests, detentions, prosecutions and convictions. These practices continued to hinder the exercise of their freedoms and led to self-censorship”*. In addition, it stresses how *“the new Media Law may have serious negative consequences for freedom of expression as it may foster self-censorship and stifle public debate”*.

---

<sup>3</sup> IPA III Annual Action Plan in favour of Türkiye for 2021 – CRIS IPA/2021/043673/2

<sup>4</sup> IPA III Annual action plan in favour of Türkiye for 2022 – OPSYS ACT-60828 JAD.981.448

<sup>5</sup> SWD (2023) 696 final. COMMISSION STAFF WORKING DOCUMENT “Türkiye 2023 Report Accompanying the document Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions 2023 Communication on EU Enlargement policy”, Brussels, 8.11.2023

The main problems faced by CSOs can be summarised as follows:

- Rights-based CSOs have limitations in their organisational and operational capacities, face financial constraints (also due to inflation), internal governance, advocacy and networking, monitoring and communicating the results of their work. Many organisations also lack technical expertise, particularly in the legal field. These weaknesses are amplified for CSOs outside main urban areas and/or in areas directly impacted by the earthquakes;
- CSOs have limited capacities in monitoring, documenting and reporting about human rights in Türkiye in compliance with the international human rights framework. This also include the need for more capacities to engage in trial monitoring, especially to follow cases related to freedom of expression and other fundamental rights;
- Independent media outlets and journalists organisations working on freedom of expression have limitations in their operational and outreach capacities. To enable independent media to reach its full potential, it is needed to ensure their business continuity, while they carry out their watchdog function. Many media actors need to strengthen their capacities to improve their operations, in particular audience engagement and development, reporting skills as well as upgrade their equipment to perform as media actors.

This action will address these three main problems related to: (a) the capacity needs of CSOs; (b) limited capacities in human rights monitoring; and (c) limited operational capacities of media actors. While there is a need to strengthen the capacity of CSOs in a more holistic way, there is also a need to address some specific areas with more targeted support, such as gender equality and women empowerment, LGBTIQ rights, access to justice, fostering cultural participation and diversity, as well as addressing environment/climate change and disaster risk management. CSOs working on specific issues face specific problems. Organisations working on women rights are numerous and vocal, but have limited networking capacities. Organisations and individuals supporting the rights of LGBTIQ are subject discrimination and have limited capacities to voice their rights. Organisations working on cultural issues face difficulties in promoting their activities, especially if belonging to cultural minorities. Environmental activists and CSOs working on climate change might face obstruction from groups of interest and the private sector.

The overall regulatory framework does not provide a conducive environment for civil society organisations. However, this aspect is not addressed through this Action Document, operating outside a Financing Agreement with the beneficiary country. A few actions are ongoing and/or foreseen under the bilateral envelope.

### **Main stakeholders**

The **main stakeholders** of this action are Civil Society Organisations (CSOs), media actors, human rights activists, UN agencies, Member States cooperation agencies and Turkish citizens. Institutional stakeholders and public authorities are not the main target under this Action Document, which falls outside the Financing Agreement with the beneficiary country, and will be involved on a case by case basis. CSOs, media actors and human rights activists will be the **main beneficiaries** of support provided under this action. UN Agencies and the Council of Europe, besides providing support to CSOs and working on the advancement of rights according to their respective mandate, can be implementing partners under this action, with the specific aim of outreaching smaller CSOs that cannot directly benefit from EU funding. Member states agencies operating in the country can be considered as potential implementing partners as well as being involved in steering committees of projects.

### **2.3. Lessons Learned**

The EU Delegation (EUD) carried out direct and indirect consultations with civil society. The main outcomes of these consultations were that overall CSOs demand more core funding (also as a consequence of major

inflation), continue support for capacity building - including strengthening of human resources - simplification of procedures, improving networking, better focus on remote and rural areas. CSOs operating in the vast area hit by the earthquakes need support to continue their operations, including support to re-build and/or re-furbish their offices.

The use of Financial Support to Third Parties (FSTP) has proven to be an effective way to respond to some of these needs and to outreach more CSOs, including grassroots. In 2022, the EUD commissioned a comprehensive evaluation on ten interventions that, with different approaches, included some kind of funds re-distribution mechanisms coupled with capacity building support. According to the evaluation, all ten mechanisms are highly relevant and effective in outreaching their target beneficiaries. Central in this approach is the combination of financial support with mentoring and/or capacity building. According to the same evaluation, in order to increase the effectiveness of EU support the best practices already in place should be preserved. Regional approaches to funding and increased core funding should also be considered with the aim to support smaller CSOs in the periphery.

The EUD has diversified the type of intermediary partners that could provide capacity-building support and have the capacity to redistribute funds (FSTP). This include UN agencies, such as UN Women, ILO and UNICEF. UN agencies have a global mandate on specific themes and the advantage of neutrality, thus avoiding the establishment of hierarchies amongst CSOs. Large and well-established CSOs demonstrating strong organisational and technical capacities also function well as intermediary partners. Under previous CSF programmes these CSOs were deliberately targeted as implementing partner to ensure continuity and building on available skills. The EUD has observed that competitive procedures are not always an advantage and should be used with prudence. Organisations working on sensitive issues should also be protected through dedicated support.

In summary, the following lessons learned will be taken into account in the action:

- Continue supporting projects that have a proven track-record;
- Maintain and strengthen FSTP and other mechanisms to reach more CSOs and grassroots organisations;
- Include more and larger core funding in sub-grants;
- Explore options to support CSOs in remote or less targeted geographical areas.

In line with these lessons learned, the EU will continue to provide support to increase the resilience of CSOs.

Support provided via the Civil Society Facility and Media programme is complemented by ongoing and upcoming actions programmed with the Turkish authorities on volunteerism and civic engagement, social entrepreneurship, and women friendly cities, funded under the Instrument for Pre-Accession (IPA). These IPA actions also include activities aiming to improve the overall regulatory and administrative framework.

### **3. DESCRIPTION OF THE ACTION**

#### **3.1. Intervention Logic**

The **overall objective** of this action is “**to strengthen participatory democracy and the EU integration and approximation process in Türkiye, through a reinforced contribution by civil society and media**”.

The **specific objective** (Outcome) of this action is “**to enhance resilience of CSOs and media actors working for the promotion and protection of human and fundamental rights, with a specific focus on women’s rights**”.

**The outputs to be delivered by this action contributing to the corresponding specific objective (Outcome) are:**



- 1. Capacity of supported CSOs to carry out their activities effectively is reinforced;**
- 2. Human rights monitoring capacities of supported CSOs are reinforced;**
- 3. Media actors' operational capacities are strengthened.**

The underlying intervention logic for this action is that:

IF CSOs' and media actors' working on human and fundamental rights operational and professional capacities are strengthened (*output*) AND the assumptions that the operational environment for civil society in Türkiye does not deteriorate and civil society organisations and other targeted stakeholders are willing to be supported with EU funding hold true, THEN this will lead to an enhanced civil society's resilience (*outcome*).

If civil society's resilience is enhanced (*outcome*) AND assumptions hold true, THEN the intervention will contribute to foster a functioning pluralistic, participatory and representative democracy, by promoting a culture of fundamental rights and dialogue (**impact and overall objective of the action**).

### **3.2. Indicative Activities**

This action covers ten main activities aiming to enhance resilience of CSOs and media actors working for the promotion and protection of human and fundamental rights. They are organised per output below. Implementation of the action is further supported by support measures.

#### **Activities related to output 1: Capacity of supported CSOs to carry out their activities effectively is reinforced:**

**“Local Resource Centres”** - The purpose of the activity is to support local actors and strengthen core functions of local CSOs by combining the experience developed by the Civil Society Development Centre (STGM in Turkish) through the Birlikte (“Together” in English) and Resource Centre projects. The project responds to the need for de-centralising support to civil society from the main urban areas to outreach rural and less-targeted areas.

The project may have two components:

- The first component would identify and support local CSOs that could act as local resource centres. Three or four local CSOs in selected geographical areas would benefit from long-term mentorship to improve their organisational capacities and learn how to provide support to smaller organisations;
- The second component will consist of Financial Support to Third Parties (FSTP) to local and grassroots organisations. STGM would keep the responsibility of contracting the sub-grants and the local resource centers would learn how to provide mentorship and support to grassroots local organisations.

**“Support CSOs working on human and fundamental rights”** - The activity will aim at enhancing resilience of CSOs working on different sub-thematic areas of human and fundamental rights. It will be implemented through a call for proposals, divided into lots, and may include operational grants. The call will target medium-sized or bigger civil society organisations working on thematic priorities such as women rights, cultural and religious rights, children rights, youth, rights of persons with disabilities, rights of persons belonging to minorities (including national, ethnic, religious and linguistic minorities), peace and inter-community dialogue, consumers' rights. The list is not exhaustive. Activities such as the promotion of networks and coalitions (including with European peer organisations), support to digitalisation might be included in the design of the grant scheme.

**“Fostering civil society participation and capacity building in access to justice in Türkiye”** - The activity’s objective is to improve access to justice for victims of human rights abuses and human rights defenders. The action will focus in particular on (a) protecting and upholding the rights of women and girls, including the right to health; (b) protecting and upholding the rights of migrants and refugees; and (c) environmental justice. To improve access to justice, activities may inter alia include capacity building, awareness raising, and provision of judiciary support and legal aid. Target groups may include the Union of Turkish Bar Associations, local Bar Associations, civil society organisations, lawyers, trainee lawyers and university students. The action will be implemented by the Council of Europe, given its experience and its mandate. This action builds on previous Council of Europe projects on women’s access to justice, while expanding the scope to other vulnerable groups, beyond women and girls.

**“Combating Gender Based Violence, promoting health and body integrity of woman and girls”** - The activity aims at supporting rights-based CSOs working on sexual and reproductive health and rights (SRHR) and prevention and response to gender-based violence (GBV). UNFPA in Türkiye has already consolidated experience in working on these issues together with its civil society partners. The action may include sub-grants (including for operational grants/core funding) combined with activities for internal capacity building of CSOs in Türkiye and for networking. Contribution to service delivery can be supported. Target beneficiaries include CSOs and grassroots organisations engaged in activities related to SRHR and preventing and responding to GBV and Child, Early and Forced Marriages (CEFM); and/or contributing to delivering services to the most vulnerable groups, including refugees and migrants.

**“Advancing the rights of LGBTIQ<sup>6</sup>”** rights holders continue facing increasing challenges in Türkiye. Building on the support provided during the first phase, the action aims at consolidating capacities of LGBTIQ organisations part of Association of Rainbow against Discrimination. Activities may include sub-grants including operational grants, but not be limited to: filling the gaps in capacity development following the first phase of the action; increasing outreach to LGBTIQ organisations with regards to their community-building, social media management, corporate communication and public campaigning; and/or Increasing outreach to LGBTIQ community members.

**"Supporting cooperation between municipalities and CSOs on cultural issues"** - As a follow-up to the action carried out by IKSIV (the İstanbul Kültür Sanat Vakfı Istanbul Cultural and Arts Foundation) funded under CSF 2021-23, the project aims at reinforcing cooperation between public institutions and non-governmental organisations in the cultural sphere. Based on lessons learned from the pilot project, the activity aims to improve the capacity of cultural professionals working for NGOs in the fields of cultural policies and cultural management and foster the civic participation in the decision-making process through enhancing dialogue and cooperation between the civil society and local public sector. The focus will be indicatively on the following three pillars: contribution of CSOs in the formulation/implementation of cultural policy, education, and support to joint projects of cultural CSOs and local authorities in arts and culture through a sub-granting scheme. The project might consider supporting best practices emerged during the pilot phase.

**“Support to organisations working on environment/climate change and disaster risk management”** - This activity will focus on reinforcing and increasing the capacities of rights-based CSOs (including grassroots organisations, community-based organisations, local initiatives, national, regional or local CSOs, networks and platforms) working on environment, climate change, disaster risk management and/or post-disaster response. The purpose is enhancing organisational and implementation capacities of CSOs, including their visibility and advocacy capacities. Increased involvement of citizens and smaller CSOs in the environment and climate actions may be fostered. Building on recent experience of disaster risk management, the capacities of new and existing platforms may be reinforced and cooperation with other networks in Türkiye and the EU

---

<sup>6</sup> Lesbian, Gay, Bisexual, Trans, Non-binary, Intersex and Queer (LGBTIQ) people.

promoted. The activity will be implemented through a call for proposal and might prioritise the geographical areas hit by the earthquakes.

### **Activities related to output 2: Human rights monitoring capacities of supported CSOs are reinforced;**

**“ETKİNİZ III: Support to Monitoring the Human Rights situation in Türkiye”** - This activity will be the third phase of ‘Etkiniz’ (‘We are active’ in English). The first phase was funded under CSF 2017 and started implementation in January 2019, and the second phase was funded under 2020 allocations until 2025. As a continuation of the previous phases, this activity will strengthen the role of Turkish Civil Society in promoting and protecting human rights through expanded monitoring and advocacy at various levels. It will support CSOs and CSO networks engaged in trial monitoring, especially to follow cases related to freedom of expression and other fundamental rights. The action will provide in-kind and expert support to CSOs to document the human rights situation, monitor trials, facilitate consolidation of multi-stakeholders’ analysis and reporting and, ultimately, to initiate advocacy campaigns calling for an enhanced legal compliance with the international human rights framework. Relevant public authorities might be involved in the action as potential beneficiaries of capacity-building activities related to the international human rights framework. A specific focus can be included in monitoring human rights in post-earthquakes reconstruction and rehabilitation.

**“Business and Human Rights” related to Outputs 1 and 2** - The EU Action Plan on Human Rights and Democracy 2020-2024 sets as a priority to reinforce the EU’s global leadership on the Business and Human Rights, in particular by enhancing the coordination and coherence of EU actions in this area. The Commission has adopted a proposal on Corporate Sustainability Due Diligence with the aim to introduce mandatory human rights and environmental due diligence across sectors. The proposed action aims at promoting the UN Guiding Principles on Business and Human Rights (UNGPs). UNDP is already carrying out actions in that area. UNDP would work with businesses, civil society, human rights defenders, academia, and others to implement the UNGPs and advance responsible business practices throughout global supply chains. Public government authorities will be involved to extent possible in project activities. The activity may include trainings, awareness raising, joint advocacy campaigns, and monitoring. The action will seek to target businesses involved in the post-earthquakes reconstruction and rehabilitation, with a view to ensure the respect of human rights.

### **Activities related to output 3: Media actors’ operational capacities are strengthened**

**“Promoting Media Freedom and Pluralism”** - This activity aims to contribute to rebuilding public trust in the media by strengthening independent media and quality journalism. Its objective is to enable independent media to reach its full potential, ensure their business continuity while carrying out its watchdog function. It will contribute to their audience engagement and development. The proposed intervention will help build the capacity of the independent media to improve their operations, strengthen their reporting, upgrade their tool and equipment etc. The activity may include financial support to third parties (FSTP) and core funding. The target group are independent media outlets (TVs and radios), agencies, media professionals, investigative journalists, and social media outlets that exhibit professionalism, are pluralist, inclusive in their editorial policies and follow a rights based approach (covering topics ranging from politics, to environment, culture to gender equality, social, academic issues etc.). To facilitate the exchange of best practices, partnerships with European partners/networks may be an integral part of the activity.

### **Activities related to the overall action:**

#### **“Support measures”**

This activity will be used to support the EU Delegation in the management of the implementation of the Civil Society Facility and Media programme (including previous years’ programming). It will contribute to the implementation of the overall Action Document and, thus, to all three outputs. Activities may include: assessing calls for proposals, monitoring of on-going grants (including financial support to third parties), evaluation of activities, organisation of training and information days and production of communication

materials, Expenditure Verification Reports and audits (including stemming from previous programming documents).

### **3.3. Mainstreaming**

#### **Environmental Protection, Climate Change and Biodiversity**

The action does not require a Strategic Environmental Assessment (SEA), an Environmental Impact Assessment (EIA), nor a Climate Risk Assessment (CRA) prior to implementation.

Environmental protection and climate change will be targeted via support to CSOs working on these issues, in particular through the activity “Support to organisations working on environment/climate change and disaster risk management”.

#### **Gender equality and empowerment of women and girls**

As per OECD Gender DAC codes identified in section 1.1, this action is labelled as G1. Two activities for a total of €10 million, specifically target gender equality and women empowerment (GEWE) and are G2. These are (activity “Combating Gender Based Violence, promoting health and body integrity of woman and girls” and activity “Advancing the rights of LGBTIQ”). In addition, gender mainstreaming will be applied in all proposed activities in line with the EU Action Plan on Gender Equality and Women's Empowerment in External Action 2021–2025. Gender balance will be sought in all the managing bodies and activities of the action and importance will be given during all stages of contracting and implementation. Equal participation of women and men will be secured in the design of activities also through dedicated/facilitated services for women. Promotion of gender equality and equal opportunities will be considered when preparing guidelines for applicants for the calls for proposals or negotiating direct grant contracts. All activities will be designed and implemented using sex-disaggregated data.

#### **Human Rights**

The whole Action Document has as main focus support to CSOs and active citizens working for the promotion of human and fundamental rights. The Action will contribute to improve the social inclusion of vulnerable groups (including people living in poverty, vulnerable women, children, persons with mental and/or physical disabilities, Roma, as well as other minority groups) and fight racism and all forms of discrimination, including antigypsyism. The Human Rights Based Approach will be applied across the board, taking into account limitation due to fact that this Action does not target primarily state institutions and duty bearers.

#### **Disability**

As per OECD Disability DAC codes identified in section 1.1, this action is labelled as D1. This implies that specific activities will target CSOs working on disability under Activity 9 “Support to CSOs working on human and fundamental rights”. An effort will be done to replicate best practices and promote access to disabled in visibility events/public gatherings/trainings.

#### **Democracy**

The overall objective of the action is to foster a functioning pluralistic, participatory and representative democracy.

#### **Conflict sensitivity, peace and resilience**

Specific activities targeting south-eastern Türkiye will have to embed an appropriate level of conflict analysis to ensure the prevention and/or mitigation of further tensions between migrants/Syrians under temporary protection and host communities.

#### **Disaster Risk Reduction**

The Action Document includes a dedicated activity on Disaster Risk Management. In the aftermath of the 2023 earthquakes, it became clear that disaster risk preparedness is needed at all levels. Whenever relevant trainings on disaster risk management, preparedness and response will be embedded in actions.

### 3.4. Risks and Assumptions

Category	Risks	Likelihood (High/Medium/Low)	Impact (High/Medium/Low)	Mitigating measures
External environment	Political developments in Türkiye may affect the ability of individuals and CSOs to participate in, and benefit from the action.	<b>High</b>	<b>High</b>	This risk is assessed high. EUD is reducing the risk by supporting a wide and range of organisations and by using appropriate and diversified tools to ensure protection of targeted organisations and individuals.
External environment	As a consequence of the earthquakes many organisations face difficulties in accessing funds and restoring their operating capacities	<b>Medium</b>	<b>Medium</b>	The action supports the whole country, including the earthquake affected area.
People and organisations	There is a concrete risk of overburdening civil society organisations with funds management	<b>High</b>	<b>Medium</b>	Applying a holistic and do-no-harm approach. Spreading funds to different/less-targeted organisations, while balancing between direct awards and competitive procedures. Using available tools and existing projects to offer capacity-building support when needed.
Planning processes and systems	Some of the activities require the willingness of implementing partners to take political and technical risks (notably as regards financial support to third parties).	<b>Low</b>	<b>Medium</b>	The EUD will encourage the deployment of legal and technical consultancy services through the available ongoing projects to support intermediary partners.

### External Assumptions

The overall assumption for the implementation of this action is that the operational environment for civil society in Türkiye does not deteriorate further. Furthermore, the assumption is that civil society organisations and other targeted stakeholders are willing to be supported with EU funding.

### **3.5. Indicative Logical Framework Matrix**

Results	Results chain: Main expected results	Indicators	Baselines (value *and years) 2023	Targets (values and years) 2028	Sources of data	Assumptions
<b>Impact</b>	<i>To strengthen participatory democracy and the EU integration and approximation process in Türkiye, through a reinforced contribution by civil society and media</i>	Democracy Index score and world ranking position	4.35 – Hybrid regime; 103 world ranking position (2022)		Economist Intelligence Unit	<i>Not applicable</i>
<b>Outcome 1</b>	Enhanced resilience of CSOs working for the promotion and protection of human and fundamental rights, with a specific focus on women’s rights.	1.1 No of CSOs reporting internal governance structures follow the principles of good governance 1.2 No of CSOs reporting effective, empowered and developed human resources	1.1 tbd 1.2 tbd	1.1 1.2	TACSO reports	The operational environment for civil society in Türkiye does not deteriorate.
<b>Output 1 related to Outcome 1</b>	Capacity of supported CSOs to carry out their activities effectively is reinforced. (past tense)	1.1.1 No of CSOs directly benefitting from EU’s support 1.1.2 No of CSOs and Grassroots organisations benefitting from EU support through intermediary partners 1.1.3 No of CSOs reporting improved advocacy capacities.	1.1.1 tbd 1.1.2 tbd 1.1.3 tbd	1.1.1 50 more 1.1.2 1000 more 1.1.3 tbd	Projects progress reports and evaluations	Civil society organisations and other targeted stakeholders are willing to be supported with EU funding.





<b>Output related Outcome 1</b>	<b>2 to</b> Human rights monitoring capacities of supported CSOs are reinforced	1.2.1 No of CSOs actively involved in human rights monitoring 1.2.2 No of CSOs reporting improved human rights monitoring capacities (as percentage of above)	1.2.1 tbd 1.2.2 tbd	1.2.1 tbd 1.2.2 70%	Projects progress reports and evaluations	See above
<b>Output 3 related Outcome 1</b>	<b>to</b> Media actors' operational capacities are strengthened	1.3.1 No of Media actors benefitting from (or reached by) EU support 1.3.2 No of Supported media actors reporting increased outreach to targeted audience	1.3.1 tbd 1.3.2 tbd	1.3.1 tbd 1.3.2 tbd	Projects progress reports and evaluations	See above

- Baseline values for 2023 will be defined following research to be funded under Support measures from CSF 2021-23.

## 4. IMPLEMENTATION ARRANGEMENTS

### 4.1. Financing Agreement

In order to implement this action, it is **not** envisaged to conclude a financing agreement with Türkiye.

### 4.2. Indicative Implementation Period

The indicative operational implementation period of this action, during which the activities described in section 3 will be carried out and the corresponding contracts and agreements implemented, is 72 months from the date of adoption by the Commission of this Financing Decision.

Extensions of the implementation period may be agreed by the Commission's responsible authorising officer in duly justified cases.

### 4.3. Implementation Modalities

The Commission will ensure that the EU appropriate rules and procedures for providing financing to third parties are respected, including review procedures, where appropriate, and compliance of the action with EU restrictive measures<sup>7</sup>.

#### 4.3.1. Direct Management (Grants)

##### 4.3.1.1. Grants

##### “Local Resource Centres”

###### (a) Purpose of the grant(s)

The activity will directly contribute to output 1. The activity will support local actors and strengthen core functions of local CSOs. The activity may include Financial Support to Third Parties (FSTP).

###### (b) Justification of a direct grant

Under the responsibility of the Commission's authorising officer responsible, the grant may be awarded without a call for proposals to the **Association of Civil Society Development Centre (STGM)**. Under the responsibility of the Commission's authorising officer responsible, the recourse to an award of a grant without a call for proposals is justified because of its technical competence and its high degree of specialisation in providing capacity-building services to other CSOs, line with Art 195, point (f), of the 2018 Financial Regulation. The Entity has managed a similar “resource centre” project in Türkiye since its foundation in 2004 providing full-fledged civil society consultancy services including: information provision, one-to-one consulting, organisational capacity assessment, and organisational design, legal advice, budget and financial management assistance, association management, volunteer mobilisation, academic referrals, networking and effective communication management. STGM has developed a set of unique tools, original methodologies and sub-granting mechanisms in its two projects “Birlikte” and the “Resource Centre”. Its role as entity providing a wide range of capacity-building services to other CSOs is unique and fully recognised by other CSOs. The specific nature of activities to be implemented to set-up local “resource centers” places it outside the scope of a call for proposal as it would need to rely on the unique modus operandi developed by STGM. No other organisation would have the capacity, knowledge and trust needed to implement the whole range of

---

<sup>7</sup> [EU Sanctions Map](#). Please note that the sanctions map is an IT tool for identifying the sanctions regimes. The source of the sanctions stems from legal acts published in the Official Journal (OJ). In case of discrepancy between the published legal acts and the updates on the website it is the OJ version that prevails.

activities to act as “resource centre”, especially in geographical areas that have benefitted less from EU’s support.

### **“Support CSOs working on human and fundamental rights”**

#### **a) Purpose of the grant(s)**

The activity will directly contribute to output 1- Capacity of supported CSOs to carry out their activities effectively is reinforced. The activity will support rights-based civil society organisations working on promoting and advancing human and fundamental rights in different sub-thematic areas and will be carried out through and call for proposal divided in lots.

#### **(b) Type of applicants targeted**

The grantee has to be a legal entity; non-profit-making; and be a civil society organisation.

### **"Supporting cooperation between municipalities and CSOs on cultural issues"**

#### **(a) Purpose of the grant(s)**

The activity will directly contribute to Output 1. The activity will help improve the capacity of cultural professionals working for NGOs in the fields of cultural policies and cultural management and foster the civic participation in the decision-making process through enhancing dialogue and cooperation between the civil society and local public sector. The focus will indicatively be on three pillars: cultural policy, education, and support to joint projects of cultural CSOs and local authorities in arts and culture through a sub-granting scheme.

#### **(b) Justification of a direct grant**

Under the responsibility of the Commission’s authorising officer responsible, the grant may be awarded without a call for proposals to the İstanbul Kültür Sanat Vakfı -Istanbul Cultural and Arts Foundation (IKSV). The recourse to an award of a grant without a call for proposals is justified because of its technical competence and its high degree of specialisation in providing capacity-building services to CSOs working in the cultural sector, in line with Art 195, point (f), of the 2018 Financial Regulation. IKSV is in a unique position to manage a combination of activities which includes sub-granting, mentoring, organising local/international events, as well as capacity building, support to advocacy and networking in the cultural sector. A direct award to IKSV is justified because the specific nature of activities to be implemented fits the unique *modus operandi* developed by IKSV. The nature and feasibility of activities to be implemented, particularly as regards fostering networking amongst different actors, is strongly dependent on the role and reputation played by the organisation. IKSV has a strong track record of working at local, national and international level with different type of actors working in the cultural sector (i.e. public bodies, academy, private sector and CSOs). It is a respected and trusted organisation, ensuring political neutrality which is an essential aspect when working with local authorities, and it has the technical in-house expertise to carry out the action.

### **“Advancing the rights of LGBTIQ”**

#### **(a) Purpose of the grant(s)**

The project will directly contribute to output 1 Capacity of supported CSOs to carry out their activities effectively is reinforced. Building on the support provided during the first phase, the action aims at consolidating capacities of LGBTIQ organisations part of the Rainbow Coalition. It may include FSTP (including for operational grants) as well as capacity-building.

#### **(b) Justification of a direct grant**

Under the responsibility of the Commission’s authorising officer responsible, the grant may be awarded without a call for proposals to the International Lesbian, Gay, Bisexual, Trans and Intersex Association- ILGA Europe. Under the responsibility of the Commission’s authorising officer responsible, the recourse to an award

of a grant without a call for proposals is justified because of its technical competence and its high degree of specialisation in supporting the LGBTIQ community, line with Art 195, point (f), of the 2018 Financial Regulation. The nature of activities to be implemented requires capacity to carry out FSTP, in depth knowledge of LGBTIQ community in the country, capacity to advocate for LGBTIQ rights in a sensitive context. ILGA Europe is the only organisation having the financial capacity as well as technical expertise to carry out a combination of sub-grants with specific capacity building for LGBTIQ community, requiring deep and up-to-date knowledge of sensitive issue in the country. ILGA Europe has a unique position as an independent, non-governmental umbrella organisation bringing together over 600 organisations from 54 countries in Europe and Central Asia, promoting the interests of lesbian, gay, bisexual, trans and intersex people, at the European level. ILGA Europe is therefore one of its kind in this region. ILGA Europe would possible work with the Association of Rainbow against Discrimination as co-applicant. This organisation was officially registered on 28 May 2021 and is currently being supported under the pilot phase of the project (CSF 2022 allocations). A direct award would help minimising the political risks for LGBTIQ organisations and individuals targeted through the action.

### **“Support to organisations working on environment/climate change and disaster risk management”**

#### **(a) Purpose of the grant(s)**

The activity will directly contribute to output 1- Capacity of supported CSOs to carry out their activities effectively is reinforced. reinforcing and increasing the capacities of rights-based CSOs (including grassroots organisations, community-based organisations, local initiatives, national, regional or local CSOs, networks and platforms) working on environment, climate change, disaster risk management and post-disaster response.

#### **(b) Type of applicants targeted**

The grantee has to be a legal entity; a civil society organisation or a private sector entity.

### **“Promoting Media Freedom and Pluralism”**

#### **(a) Purpose of the grant(s)**

The activity will directly contribute to Output 3, Media actors’ operational capacities are strengthened. The objective of the proposed intervention is to enable independent media to reach its full potential, ensure their business continuity while carrying out its watchdog function. The proposed intervention will help build the capacity of the independent media to improve their operations, strengthen their reporting, upgrade their tool and equipment etc. The activity shall also include financial support to third parties, including, when necessary, core funding.

#### **(b) Justification of a direct grant**

Under the responsibility of the Commission’s authorising officer responsible, the grant may be awarded without a call for proposals to the European Endowment for Democracy (EED). The recourse to an award of a grant without a call for proposals is justified because of its technical competence and its high degree of specialisation in providing capacity-building services to other CSOs, line with Art 195, point (f), of the 2018 Financial Regulation. EED is in a unique position to carry out the activity in full confidentiality which is necessary in a highly politically sensitive atmosphere. It has extensive in-house technical media expertise, extensive experience with management of sub-grants, and experience with and knowledge of the media landscape in Türkiye, in addition to safe/secure channels to operate. The EED is an independent, grant-making organisation, established in 2013 by the European Union.

The specific nature of activities to be implemented, which involves sensitive work with media outlets in a context under high political pressure, places it outside the scope of a call for proposals, as it would need to rely on the unique *modus operandi* used by EED.

The part of the action under the budgetary envelope reserved for grants may, partially or totally and including where an entity is designated for receiving a grant without a call for proposals, be implemented in indirect management with an entity, which will be selected by the Commission’s services using the following criteria:

- relevant extensive technical experience in working with CSOs/media organisations and in supporting the civil society and media sectors;
- demonstrated operational capacity to manage projects of similar size, and to ensure a proper implementation of FSTP schemes.

#### 4.3.2. Direct Management (Procurement)

Procurement is foreseen for the following activities:

- **“ETKİNİZ III: Support to Monitoring the Human Rights situation in Türkiye”**, contributing to outcome 2 “Human rights monitoring capacities of supported CSOs are reinforced”. **“Support measures”** contributing to outcomes 1 and 3 “Capacity of supported CSOs to carry out their activities effectively is reinforced”; and “Media actors’ operational capacities are strengthened”.

#### 4.3.3. Indirect Management with a pillar-assessed entity

**A part of this action may be implemented in indirect management with the United Nations Population Fund (UNFPA) for “Combating Gender Based Violence, promoting health and body integrity of woman and girls”**. This implementation entails support to CSOs working on reproductive rights/family planning and Gender Based Violence (GBV) from the perspective of sexual and reproductive health and rights and will contribute to the achievement of output 1: Capacity of supported CSOs to carry out their activities effectively is reinforced. The envisaged entity has been selected using the following criteria:

- Mandate of the organisation: UNFPA is the United Nations agency with the mandate on sexual and reproductive health and rights as well as Gender Based Violence;
- Extensive experience in the country;
- Experience with refugees, migrants and other vulnerable groups.

If negotiations with the above-mentioned entity fail, that part of this action may be implemented in indirect management with UN Women. The implementation by this alternative entity would be justified because of the following criteria:

- Mandate of the organisation: UN Women is the mandated UN agency to work on gender equality. As such it works on Gender Based Violence;
- Extensive experience in the country;
- Positive previous experience in managing EU funds addressing CSOs;
- Experience with refugees, migrants and other vulnerable groups.

**A part of this action may be implemented in indirect management with the Council of Europe (CoE) for “Fostering civil society participation and capacity building in access to justice in Türkiye”**. This implementation entails improving access to justice to women girls and to other vulnerable groups. The action would focus on providing capacity building trainings, awareness raising activities as well as legal aid services and will contribute to achieving output 1: Capacity of supported CSOs to carry out their activities effectively is reinforced. Target groups would be lawyers, through Bar Associations, civil society organisations and university students across the country. The envisaged entity has been selected using the following criteria:

- Mandate of the organisation: the CoE has the scope to uphold human rights, democracy and the rule of law in Europe;
- Previous experience: the CoE has already implemented similar activities in the country;
- Unique position: the organisation is perceived as neutral by targeted beneficiaries, and is the position to dialogue with governmental bodies if needed.

**A part of this action may be implemented in indirect management with the United Nations Development Programme (UNDP) for “Business and Human Rights”.**

This implementation entails promoting the UN Guiding Principles on Business and Human Rights (UNGPs) with relevant stakeholders and will contribute to achieving output 2: Human rights monitoring capacities of supported CSOs are reinforced. The action foresees trainings, awareness raising, joint advocacy campaigns, and monitoring activities amongst other. The action will seek to target businesses involved in the post-quake reconstruction and rehabilitation, with a view to ensure the respect of human rights. The envisaged entity has been selected using the following criteria:

- Role and position of the organisation: the UNDP is in a unique position to work with all relevant stakeholders on the issue;
- Previous experience: UNDP is already carrying out similar actions for the promotion of the UNGPs in several other countries;
- Lack of other viable alternatives with specialised CSOs: a similar activity was programmed under CSF 2020 allocations and had to be cancelled since the selected organisation was not granted permit to work in Türkiye.

If negotiations with the above-mentioned entity fail, that part of this action may be implemented in indirect management with the International Labour Organisation (ILO). The implementation by this alternative entity would be justified because of the following criteria:

- Mandate of the organisation: advancing social justice and promoting decent work. Respecting human rights is key in the organisation’s mandate. Additionally, the UN Guiding Principles on business and human rights, in its Principle no 12, directly refers to the ILO Declaration on Fundamental Principles and Rights at Work. It encompasses eight ILO core conventions regarding freedom of association and right to collective bargaining; non-discrimination and equal pay for equal work; elimination of forced labour and child labour.
- Previous experience: the organisation is currently managing a project under CSF 2021 allocations, supporting CSOs with sub-grants and capacity building on issues related to labour rights.

**4.3.4. Changes from indirect to direct management (and vice versa) mode due to exceptional circumstances**

If the implementation modality under indirect management with the Council of Europe (CoE) for “Fostering civil society participation and capacity building in access to justice in Türkiye” as defined in section ‘4.3.3’ cannot be implemented due to circumstances beyond the control of the Commission, the modality of implementation by grants under direct management would be used according to the following section:

(a) Subject matter of the grant (s)

The activity will contribute to output 1: Capacity of supported CSOs to carry out their activities effectively is reinforced. The action will focus in particular on protecting and upholding the rights of women and girls, including the right to health; protecting and upholding the rights of migrants and refugees; and environmental justice. To improve access to justice, activities may inter alia include capacity building, awareness raising, and provision of judiciary support and legal aid.

(b) Type of applicants targeted.

The grantee has to be a legal entity; non-profit-making; and be a civil society organisation.

**4.4. Scope of geographical eligibility for procurement and grants**

The geographical eligibility in terms of place of establishment for participating in procurement and grant award procedures and in terms of origin of supplies purchased as established in the basic act and set out in the relevant contractual documents shall apply, subject to the following provisions.

The Commission’s authorising officer responsible may extend the geographical eligibility on the basis of urgency or of unavailability of services in the markets of the countries or territories concerned, or in other duly substantiated cases where application of the eligibility rules would make the realisation of this action impossible or exceedingly difficult (Article 28(10) NDICI-Global Europe Regulation).

#### 4.5. Indicative Budget

<b>Indicative Budget components</b>	<b>EU contribution (amount in EUR) 2024</b>	<b>EU contribution (amount in EUR) 2025</b>	<b>Indicative third-party contribution (amount in EUR)<sup>8</sup></b>
<b>Outcome 1 Enhance the resilience of CSOs working for the promotion and protection of human and fundamental rights</b>			
<i>Grants (direct management) – cf. section 4.3.1</i>			
Local Resource Centres	4 000 000.00		
Supporting cooperation between municipalities and CSOs on cultural issues		4 000 000.00	
Advancing the rights of LGBTIQ		2 500 000.00	
Support CSOs working on human and fundamental rights		6 000 000.00	300 000.00
Support to organisations working on environment/climate change and disaster risk management		5 000 000.00	250 000.00
Promoting Media Freedom and Pluralism		4 000 000.00	
<i>Procurement (direct management) – cf. section 4.3.2</i>			
ETKİNİZ III: Support to Monitoring the Human Rights situation in Türkiye	5 000 000.00		NA
Support measures	200 000.00	300 000.00	NA
<i>Indirect management with UN or international organisations - - cf. section 4.3.3</i>			

<sup>8</sup> The amounts below refer to co-financing from beneficiaries.



Combating Gender Based Violence, promoting health and body integrity of woman and girls with UNFPA	6 000 000.00		tbc
Fostering civil society participation and capacity building in access to justice in Türkiye with CoE	4 000 000.00		tbc
Business and Human Rights with UNDP	2 000 000.00		tbc
<b>Grants</b> – total envelope under section 4.3.1	<b>4 000 000</b>	<b>21 500 000</b>	
<b>Procurement</b> – total envelope under section 4.3.2	<b>5 200 000</b>	<b>300 000</b>	
<b>Indirect management with a pillar-assessed entity</b> – total envelope under section 4.4.3	<b>12 000 000</b>		
<b>Evaluation</b> – c.f. section 5.2 <b>Audit</b> – c.f. section 5.3 <b>Strategic Communication</b> – c.f. section 6	N.A.	To be covered by another Decision	N.A.
<b>Totals</b>	<b>21 200 000</b>	<b>21 800 000</b>	<b>550 000</b>

#### 4.6. Organisational Set-up and Responsibilities

The action will be implemented under Direct management mode through call for proposals and procurement, where the Contracting Authority shall be the Delegation of the European Union to Türkiye.

As part of its prerogative of budget implementation and to safeguard the financial interests of the Union, the Commission may participate in Steering Committees, Advisory Boards or other structures set up for governing the implementation of the action.

## 5. PERFORMANCE MEASUREMENT

### 5.1. Monitoring and Reporting

The day-to-day technical and financial monitoring of the implementation of this action will be a continuous process, and part of the implementing partner's responsibilities. To this aim, the implementing partner shall establish a permanent internal, technical and financial monitoring system for the action and elaborate regular progress reports (not less than annual) and final reports. Every report shall provide an accurate account of implementation of the action, difficulties encountered, changes introduced, as well as the degree of achievement of its outputs and contribution to the achievement of its outcomes, and if possible at the time of reporting, contribution to the achievement of its Impacts, as measured by corresponding indicators, using as reference the log-frame matrix. Results will also be assessed against the DG NEAR Guidelines for EU support to civil society in the enlargement region for 2021-2027. The Commission may undertake additional project monitoring visits both through its own staff and through independent consultants recruited directly by the Commission for independent monitoring reviews (or recruited by the responsible agent contracted by the Commission for implementing such reviews). Arrangements for monitoring and reporting, including roles and responsibilities for data collection, analysis and monitoring: the EU Delegation, as Contracting Authority, will monitor all activities included in this action. This will be done through Steering Committees and/or Monthly Management Meetings, On-the-Spot visits and other monitoring actions as appropriate.

## 5.2. Evaluation

Having regard to the importance of the action, mid-term, final or ex-post evaluation(s) will be carried out for this action or its components via independent consultants contracted by the Commission under the “Support Measures”.

Mid-term evaluations will be carried out for learning purposes, in particular with respect to envisaging a follow-up of the action and to spot potential issues during implementation.

Ex-post evaluations can target actions funded under previous CSF programmes (notably CSF 2021-23 AD). Ex-post evaluations will be carried out for accountability and learning purposes at various levels (including for policy revision), taking into account in particular the fact that the use of FSTP has considerably expanded in the latest years.

The Commission shall form a Reference Group (RG) composed by representatives from the main stakeholders at both EU and national (representatives from the government, from civil society organisations (private sector, NGOs, etc.), etc.) levels. If deemed necessary, other donors will be invited to join. The Commission shall inform the implementing partner at least one month in advance of the dates envisaged for the evaluation exercise and missions. The implementing partner shall collaborate efficiently and effectively with the evaluation experts, and inter alia provide them with all necessary information and documentation, as well as access to the project premises and activities.

The evaluation reports shall be shared with key stakeholders following the best practice of evaluation dissemination<sup>9</sup>. The implementing partner and the Commission shall analyse the conclusions and recommendations of the evaluations and, where appropriate, in agreement with the Beneficiary, jointly decide on the follow-up actions to be taken and any adjustments necessary, including, if indicated, the reorientation of the project.

The financing of the evaluation shall be covered by another measure constituting a financing Decision.

## 5.3. Audit and Verifications

Without prejudice to the obligations applicable to contracts concluded for the implementation of this action, the Commission may, on the basis of a risk assessment, contract independent audit or verification assignments for one or several contracts or agreements.

## 6. STRATEGIC COMMUNICATION AND PUBLIC DIPLOMACY

All entities implementing EU-funded external actions have the contractual obligation to inform the relevant audiences of the Union’s support for their work by displaying the EU emblem and a short funding statement as appropriate on all communication materials related to the actions concerned. To that end they must comply with the instructions given in the 2022 guidance document [Communicating and raising EU visibility: Guidance for external actions](#) (or any successor document).

This obligation will apply equally, regardless of whether the actions concerned are implemented by the Commission, the Beneficiary, service providers, grant beneficiaries or entrusted or delegated entities such as UN agencies, international financial institutions and agencies of EU Member States. In each case, a reference to the relevant contractual obligations must be included in the respective financing agreement, procurement and grant contracts, and contribution agreements.

---

<sup>9</sup> See best [practice of evaluation dissemination](#)

## **7. SUSTAINABILITY**

All components of the action aim at strengthening the capacities of CSOs and at improving the skills of citizens for the promotion and protection of human rights and fundamental freedoms in Türkiye. The main assumption of the action is that target groups and beneficiaries of the various activities will benefit from the action even after its completion. By enhancing the capacities and resilience, of CSOs the action will contribute to a functioning and active civil society in Türkiye. Many of the activities proposed are building on previous successful experiences and on recommendations from evaluations suggesting the continuation of successful mechanisms to outreach more and smaller CSOs.

**Appendix 1: IDENTIFICATION OF THE PRIMARY INTERVENTION LEVEL FOR REPORTING IN OPSYS**

A Primary intervention (project/programme) is a coherent set of results structured in a logical framework aiming at delivering development change or progress. Identifying the level of the primary intervention will allow for:

- ✓ Differentiating these Actions or Contracts from those that do not produce direct reportable development results, defined as support entities (i.e. audits, evaluations);
- ✓ Articulating Actions and/or Contracts according to an expected common chain of results and therefore allowing them to ensure a more efficient and aggregated monitoring and reporting of performance;
- ✓ Having a complete and exhaustive mapping of all results-bearing Actions and Contracts.

The present Action identifies as

<b>Group of contracts level</b> (i.e: i) series of programme estimates, ii) cases in which an Action Document foresees many foreseen individual legal commitments (for instance four contracts and one of them being a Technical Assistance) and two of them, a technical assistance contract and a contribution agreement, aim at the same objectives and complement each other, iii) follow up contracts that share the same log frame of the original contract)	
<input checked="" type="checkbox"/>	Group of contracts